

# ENVIRONMENTAL MANAGEMENT PLAN

## The Proposed Utilisation of Borrow Pits Road: ORTDM-IR03 - Jongisizwe Access Road (OR Tambo District Municipality)

### Department of Roads and Public Works Province of the Eastern Cape



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## 1 Proposal Release Notice

<i>Proposal Status</i>	<i>Date</i>	<i>Authorised</i>
Internal Draft	December 05, 2011	Mr Conroy van der Riet
Client Draft	December 06, 2011	Ms Lee-Anne Proudfoot
Public Draft	January 12, 2012	Ms Lee-Anne Proudfoot
Final Report	February 17, 2012	Ms Lee-Anne Proudfoot

This Report has been prepared by BESC the trading name of Biotechnology & Environmental Specialist Consultancy cc, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporating our Standard Terms and Conditions of Business and taking account of the resources devoted to it by agreement with the client.

BESC disclaims any responsibility to the client and others in respect of any matters outside the scope of the above.

This Report is exclusive to the client and the described project. BESC accepts no responsibility of whatsoever nature to third parties to whom this Background Information Document, or any part thereof, is made known. Any such persons or parties rely on the report at their own risk.

## 2 Limitations

BESC has prepared this report for the sole use of the **DEPARTMENT OF ROADS & PUBLIC WORKS** in accordance with generally accepted consulting practises and for the intended purposes as stated in the agreement under which this work was completed. This report may not be relied upon by any other party without the explicit written agreement of the **DEPARTMENT OF ROADS & PUBLIC WORKS** and **BESC**. No other warranty, expressed or implied, is made as to the professional advice included in this report.

The conclusions and recommendations contained in this report are based upon information provided by others and the assumption that all relevant information has been provided by those bodies from whom it has been requested. Where field investigations have been carried out, they have been restricted to a level of detail required to achieve the stated objectives of the work.

All items listed in BESC's Standard Terms and Conditions of Business are applicable to this report.

## 3 Limiting Conditions

This report was compiled from information obtained from the following sources:

1. Numerous site visits and assessments
2. Public participation
3. Information on biophysical environment - BESC
4. Information on Borrow Pits - Controlab
5. Information on Cultural, Heritage & Archaeological resources - ArchaeoMaps
6. Information on Palaeontological Resources - Metsi Metseng Geological & Environmental Services

## 4 Special Conditions

None

## 5 Natural Science Professions Act

The Principal of BESC, Dr Malcolme Logie, is registered with the:

- South African Council for Natural Scientific Professions (SACNASP), in accordance with the Natural Sciences Professions Act (Act 27 of 2003), as a *Professional Natural Scientist - Environmental Scientist*. As such work undertaken by BESC in Environmental Management complies with the requirement of the Act, which states, “*only individuals registered may practice in a consulting capacity.*”
- The South African Institute of Ecologist & Environmental Scientist, and is registered as a *Professional Member - Environmental Scientist*.
- Certification Board of the Environmental Assessment Practitioners of South Africa (EAPSA), as a *Certified Environmental Assessment Practitioner*
- International Association of Impact Assessors - South Africa
- Senior Lead Auditor: Bureau Veritas (Safety, Health, Environment & Quality)
- Lead Auditor: TUV (Safety, Health, Environment)
- Lead Auditor: British Standard Institute (Safety, Health, Environment)

Senior Environmental Consultants:

Ms Lee-Anne Proudfoot is registered with the:

- South African Council for Natural Scientific Professions (SACNASP), in accordance with the Natural Sciences Professions Act (Act 27 of 2003), as a *Professional Natural Scientist - Environmental Scientist*. As such work undertaken by BESC in Environmental Management complies with the requirement of the Act, which states, “*only individuals registered may practice in a consulting capacity.*”
- International Association of Impact Assessors - South Africa

Mr Conroy van der Riet is registered with the:

- South African Council for Natural Scientific Professions (SACNASP), in accordance with the Natural Sciences Professions Act (Act 27 of 2003), as a *Professional Natural Scientist - Environmental Scientist*. As such work undertaken by BESC in Environmental Management complies with the requirement of the Act, which states, “*only individuals registered may practice in a consulting capacity.*”
- International Association of Impact Assessors - South Africa

## 6 Legal Requirements

### 6.1 National Acts and Regulations

#### 6.1.1 The Constitution of South Africa, Act No 106 of 1996

Chapter 2 of the Bill of Rights that forms part of The Constitution of South Africa provides for an 'environmental right', and in terms of Section 7, the State is obliged to respect, promote and fulfil the rights in the Bill of Rights. An obligation is therefore placed on the State to give effect to the environmental right and this is achieved through the right of everyone:

- To an environment that is not harmful to their health or well-being,
- To have the environment protected, for the benefit of present and future generations, though reasonable legislative and other measures that:
  - Prevent pollution and ecological degradation,
  - Promote conservation,
  - Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

#### 6.1.2 Mineral and Petroleum Resources Development Act

The Minerals and Petroleum Resources Development Act, 2002 (Act No 28 of 2002) was developed to ensure that provision is made for equitable access to, and sustainable development of, South Africa's mineral and petroleum resources and to provide insight, guidance and control for matters connected thereto. It seeks to provide management tools that ensure that all mining operations are undertaken in an environmentally sound manner according to government approved documents that hold the applicant responsible for any environmental degradation that their mining actions might cause. It also seeks to expand opportunities for historically disadvantaged South Africans and promote employment and welfare of SA citizens. It ensures that holders of mining and production rights contribute towards the socio-economic development of the areas in which they operate.

#### 6.1.3 Mineral and Petroleum Resources Regulations

Regulations in terms of Section 107(1) of the Act were published in Government Notice No. R. 526 on the 23<sup>rd</sup> April 2004. The regulations provide details of the procedures to be followed in applying for or renewing mining and prospecting rights and permits and for the closure of mining operations as provided and described in the Mineral and Petroleum Resources Development Act (M&PRDA).

The Department of Roads & Public Works, as an organ of state, has applied for exemption from certain provisions of the Act, as allowed in terms of Section 106(1). Utilization of any material sources is therefore subject to the preparation, submission and approval of an Environmental Management Plan compiled in accordance with Section 39(2) and Regulation 52 of the M&PRDA.

#### **6.1.4 Mineral and Petroleum Resources Development Amendment Act**

The Mineral and Petroleum Resources Development Amendment Act, 2009 (Act No 49 of 2009) was gazetted on the 21 April 2009 in order to amend the Mineral and Petroleum Resources Development Act, 2002, so as to make the Minister the responsible authority for implementing environmental matters in terms of the National Environmental Management Act, 1998 and specific environmental legislation as it relates to prospecting, mining, exploration, production and related activities or activities incidental thereto on a prospecting, mining, exploration or production area; to align the Mineral and Petroleum Resources Development Act with the National Environmental Management Act, 1998 in order to provide for one environmental management system, to remove ambiguities in certain definitions; to add functions to the Regional Mining Development and Environmental Committee; to amend the transitional arrangements so as to further afford statutory protection to certain existing old order rights; and to provide for matters connected therewith.

Any provision related to prospecting, mining, exploration and production and related activities comes into operation only 18 months after the commencement of the M&PDRA Amendment Act. This Amendment Act is yet to come into effect.

#### **6.1.5 National Environmental Management Act**

The National Environmental Management Act (Act 107 of 1998) (NEMA), has largely superseded the Environment Conservation Act (Act 73 of 1989), and now serves as a framework for environmental management, in which development must be socially, environmentally and economically sustainable.

Section 2(1) of NEMA sets out a range of environmental principles that are to be applied by all organs of state when taking decisions that significantly affect the environment. Included amongst the key principles is the directive that all development must be socially, economically and environmentally sustainable, and that environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably. Therefore the proposed development must to consider the following principles:

- Environmental management must be integrated, taking into account the effects of decisions on all aspects of the environment and on all people;
- Environmental justice must be pursued to ensure that adverse impacts are not distributed in a manner so as to unfairly discriminate against any person, particularly vulnerable or disadvantaged persons;
- Equitable access to environmental resources, benefits and services to meet basic human needs and to ensure that human well-being is pursued;
- The participation of Interested & Affected Parties (I&AP's) in environmental governance must be promoted;
- Community well-being and empowerment must be promoted through environmental education;
- The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in light of these considerations; and
- Decisions must be taken in an open and transparent manner.

In terms of the current regulations, Section 1 of Government Notice R544 (2010), Section 1 of Government Notice R545 (2010) and Section 1 of Government Notice R546 (2010), provides a schedule of activities which may have a substantial detrimental effect on the environment, and which require authorisation by the DWEA (formerly DEAT) before they may commence. With regards to the proposed utilisation of the identified borrow pits, no listed activities requiring environmental authorisation have been triggered.

#### **6.1.6 National Environmental Management Amendment Act**

On 1 May 2009 the National Environmental Management Amendment Act, 2008 (Act No. 62 of 2008) ("the NEMA Amendment Act"), came into operation. The NEMA Amendment Act has implications on the way in which the Environmental Impact Assessment ("EIA") process is implemented.

It serves to amend the National Environmental Management Act, 1998, so as to insert certain definitions and to substitute others; to further regulate environmental authorisations; to empower the Minister of Minerals and Energy to implement environmental matters in terms of the National Environmental Management Act, 1998, in so far as it relates to prospecting, mining, exploration, production or related activities on a prospecting, mining, exploration or production area; to align environmental requirements in the Mineral and Petroleum Resources Development Act, 2002, with

the National Environmental Management Act, 1998, by providing for the use of one environmental system and by providing for environmental management programmes, consultation with State departments, exemptions from certain provisions of the National Environmental Management Act, 1998, financial provision for the remediation of environmental damage, the management of residue stockpiles and residue deposits, the recovering of cost in the event of urgent remedial measures and the issuing of closing certificates as it relates to the conditions of the environmental authorisation; and to effect certain textual alterations; and to provide for matters connected therewith.

#### 6.1.7 Environment Conservation Act

The Environmental Conservation Act (Act 73 of 1989) aimed “to provide for the effective protection and controlled utilization of the environment and for matters incidental thereto”, and predated NEMA as the country’s primary environmental statute. Much of the ECA was repealed with the promulgation of NEMA, with the environmental impact assessment regulations in turn being repealed when the regulations under NEMA mentioned in the previous section were adopted. The foundation before this promulgation consisted of Parts V and VI of the ECA that related to the “control of activities which may have detrimental effect on the environment”.

In addition, section 25 of the Act makes provision for the regulations regarding noise, vibration and shock. These regulations are provided for Noise Control.

#### 6.1.8 National Water Act

The National Water Act (Act 36 of 1998) (NWA) provided fundamental law relating to water resources. The preamble to the Act recognises that the ultimate aim of water management is to achieve sustainable use of water for the benefit of all users, and that the protection of the quality of water resources is necessary to ensure sustainability of the nation’s water resources in the interests of all water users. The purpose of the Act is stated, in Section 2 as, *inter alia*:

- Promoting the efficient, sustainable and beneficial use of water in the public interest;
- Facilitating social and economic development;
- Protecting aquatic and associated ecosystems and their biological diversity; and
- Reducing and preventing pollution and degradation of water resources.

#### 6.1.9 National Forests Act

The principles of the National Forests Act (Act 84 of 1998) (NFA) pertain to:

- The protection of natural forests (except under exceptional circumstances where the Minister determines that the proposed new land use is preferable in terms of its economic, social or environmental benefits);
- The conservation of a minimum area of each woodland type; and
- The management of forests to ensure sustainability of resources (wood, soil, biological diversity, etc).

No person may cut, disturb, damage or destroy any indigenous living tree in, or remove or receive any such tree from, a natural forest except in terms of-

- (a) A license issued under subsection (1) or section 23; or
- (b) An exemption from the provisions of this subsection published by the Minister in the Gazette on the advice of the Council.

The Minister may declare to be a natural forest a group of indigenous trees whose crowns are not largely contiguous; or where there is doubt as to whether or not their crowns are largely contiguous, if he or she is of the opinion based on scientific advice, that the trees make up a forest which needs to be protected in terms of this Part.

The Minister declares a forest to be a natural forest by publishing a notice in the Gazette; and publishing a notice in two newspapers circulating in the area; and airing a notice on two radio stations broadcasting to the area.

The Minister may issue a licence to cut, damage or destroy any indigenous, living tree in. or remove or receive any such tree from a natural forest.

#### 6.1.10 Conservation of Agricultural Resources

The Conservation of Agricultural Resources Act (Act 13 of 1983) makes provision for the actions required with regard to any plant species depend on the *category* in which the plant appears of the amended regulations, and might differ from province to province. In certain cases, special conditions were added that apply only to that specific species.

##### **Category 1 plants, or declared weeds**

These are prohibited plants that will no longer be tolerated, neither in rural nor urban areas, except with the written permission of the executive officer or in an approved biocontrol reserve. These plants may no longer be planted or propagated, and all trade in their seeds,

cuttings or other propagative material is prohibited. They may not be transported or be allowed to disperse.

Plant species were included in this list for one or more of the following reasons: they might pose a serious health risk to humans or livestock, cause serious financial losses to land users, be able to invade undisturbed environments and transform or degrade natural plant communities, use more water than the plant communities they replace or be particularly difficult to control. Most of the plants in this category produce copious numbers of seeds, are wind or bird dispersed or have highly efficient means of vegetative reproduction. Whereas some of these plants were introduced inadvertently, have no obvious function to fulfil in South Africa and are generally regarded as undesirable, many of them are popular garden or landscaping plants. What they all have in common, however, is the fact that their harmfulness outweighs any useful properties they might have. Care was taken not to include a plant in this category if part of the population of South Africa would suffer because of its absence. The ornamentals in this category ought to be reasonably easy to replace with less invasive substitutes.

### **Plant invaders of Category 2**

These are plants with the proven potential of becoming invasive, but which nevertheless have certain beneficial properties that warrant their continued presence in certain circumstances. CARA makes provision for Category 2 plants to be retained in special areas demarcated for that purpose, but those occurring outside demarcated areas have to be controlled. The exception is that Category 2 plants may also be retained or cultivated in biological control reserves, where the plants will serve as host plants for the breeding of biological control agents. The growing of Category 2 plants in a demarcated area qualifies as a water use, and is subject to the requirements of section 21 of the National Water Act, 1998 (Act No. 36 of 1998).

An area can only be demarcated for the growing of Category 2 plants by the Executive Officer. The land user needs to obtain a water use license; the plants have to primarily serve a commercial or utility purpose, such as a woodlot, shelter belt, building material, animal fodder, soil stabilization, medicinal or own consumption; the conditions under which they are cultivated, have to be controlled; all reasonable steps have to be taken to curtail the spreading of seeds or vegetatively reproducing material outside the demarcated area, and all specimens outside the demarcated area have to be controlled. The Executive Officer has

the power to impose additional conditions to ensure the adequate control of Category 2 plants in demarcated areas.

Seed or other propagative material of Category 2 plants may only be sold to, and acquired by, land users of areas demarcated for the growing of that species, or for the establishment of a biocontrol reserve. Category 2 plants may not occur within 30 m from the 1:50 year flood line of watercourses or wetlands, unless authorization has been obtained in terms of the National Water Act. The Executive Officer has the power to grant exemption from some of the above requirements.

### **Plant invaders of Category 3**

These plants are undesirable because they have the proven potential of becoming invasive, but most of them are nevertheless popular ornamentals or shade trees that will take a long time to replace. A few of them were placed into this category instead of into category 1 because they do not cause problems in all situations. In terms of Regulation 15 of CARA, Category 3 plants will not be allowed to occur anywhere except in biological control reserves, unless they were already in existence when these regulations went into effect. The conditions on which these already existing plants may be retained are that they do not grow within 30 m from the 1:50 year flood line of watercourses or wetlands, that all reasonable steps are taken to keep the plant from spreading, and that the Executive Officer has the power to impose additional conditions or even prohibit the growing of Category 3 plants in any area where he has reason to believe that these plants will pose a threat to the agricultural resources.

Propagative material of these plants, such as seeds or cuttings, may no longer be planted, propagated, imported, bought, sold or traded in any way. It will, however, be legal to trade in the wood of Category 3 plants, or in other products that do not have the potential to grow or multiply. The Executive Officer will have the power to grant exemption from some of the above requirements.

### **Control methods**

The amended regulations stress that, when controlling plants that occur in areas where they are not allowed, methods should be used that are appropriate for the species concerned as well as to the ecosystem in which they occur. One or a combination of the following control methods may be used: uprooting, felling, cutting, burning, treatment with registered

herbicides, biological control or any other recognized and appropriate method. Repetitive follow-up actions will be mandatory until the required control has been achieved.

The aim of control is to reach a point where, ideally, the plants concerned do no longer occur in that particular area or, at least, where the plants can no longer grow, produce viable seeds or spores, coppice, sprout or produce root suckers, reproduce vegetatively, propagate themselves in any other way, or spread into other areas. If this is not possible, the plants have to be contained and their multiplication limited as far as possible.

When controlling weeds and invaders, damage to the environment has to be limited to the minimum. CARA does not specify the types of environmental damage that might be caused by control actions, but a few examples would be:

1. The removal of or herbicidal damage to non-target plants
2. The chemical pollution of soil or water or any other threat to non-target organisms
3. The irresponsible use of fire
4. The creation of a fire hazard by allowing flammable material to accumulate in fire-sensitive areas
5. Unnecessary or irresponsible disturbance of the soil, especially on riverbanks or slopes
6. Failure to rehabilitate denuded areas so as to prevent soil erosion and invasion by other undesirable species
7. Any other action that might upset the ecological balance of the environment.

Biological control of weeds is subject to rigorous regulations, and will be recognized by CARA as a valid control method only if it is practiced in accordance with all these regulations. Biological control involves the use of host-specific natural enemies of weeds or invaders from the plant's country of origin, to either kill or remove the invasive potential of these plants. It may only be initiated by and carried out under the supervision of an academic or research institute or organization established by legislation, which practises and researches biological control of weeds and invader plants. In order to prevent the waste of biocontrol research effort, money and natural enemies, CARA also lays down certain rules for the protection of biological control agents. In areas where biological control is effective, no additional control methods should be used that would harm the biocontrol agents. Provision is made for certain areas to be set aside as biological control reserves, i.e. areas in which a number of invasive plants are maintained as host plants for the

biological control agents, to ensure the continued presence of the agents in that area. Only the Executive Officer may designate a biological control reserve, on condition that it is used by a biocontrol expert to rear and redistribute biocontrol agents. In such a biological control reserve, no measures may be applied that would render the biocontrol agents ineffective.

Nothing contained in Regulation 15 may be used as a reason for ignoring or circumventing any other laws.

#### **6.1.11 National Environmental Management: Biodiversity Act**

The Biodiversity Act (Act 10 of 2004) falls within the framework of the National Environmental Management Act and provides for:

- The management and conservation of biological diversity and of components of such biodiversity;
- Protection of species and ecosystems that warrant National protection;
- Sustainable use of indigenous biological resources;
- The fair and equitable sharing of benefits arising from bio-prospecting including indigenous biological resources; and
- The establishment of a National Biodiversity Institute.

Furthermore it gives affect to ratified international agreements relating to biodiversity which are binding on the Republic, it provides for co-operative governance in biodiversity management and conservation, and provides for a South African National Biodiversity Institute to assist in achieving the objectives of this Act.

Species listed on the NEM: BA Threatened or Protected Species List/Schedule requires permits to be obtained from the Department of Environmental Affairs should a restricted activity involving the specimen be undertaken.

#### **6.1.12 Provincial Nature Conservation Ordinance**

Protected indigenous plants in general are currently controlled under the relevant provincial Ordinances or Acts dealing with nature conservation. The Eastern Cape falls under the Cape Nature and Environmental Conservation Ordinance (1974). In terms of this Ordinance, a permit must be obtained from Department of Economic Affairs Environment and Tourism (DEDEA) to remove or destroy any plants listed as 'endangered', and a letter of consent from the landowner must be obtained to remove or destroy any plants listed as 'protected' in the Ordinance.

### 6.1.13 National Heritage Resources Act

The purpose of the National Heritage Resources Act (Act 25 of 1999) is to:

- Introduce an integrated and interactive system for the management of the national heritage resources;
- Promote good government at all levels, and empower civil society to nurture and conserve their heritage resources so that they may be bequeathed to future generations;
- Introduce an integrated system for the identification, assessment and management of the heritage resources of South Africa;
- Control the export/import of nationally significant heritage objects;
- Enable the province to establish heritage authorities which must adopt powers to protect and manage certain categories of heritage resources; and
- Provide for the protection and management of conservation worthy places and areas by local authorities.

Part 2 of the Act provides for the protection and preservation of structures, sites of archaeological and palaeontological sites, meteorite sites, burial grounds and graves, public monuments and memorials. It also includes the procedures and requirements for heritage resources management.

### 6.1.14 National Environment Management: Air Quality Act

The Atmospheric Pollution Prevention Act has been repealed by the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004). The purpose of the National Environment Management: Air Quality Act (Act 39 of 2004) is to regulate air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development; to provide for national norms and standards regulating air quality monitoring, management and control by all spheres of government; for specific air quality measures; and for matters incidental thereto.

### 6.1.15 Explosives Act, 1956 (Act No 26 of 1956)

For blasting, a permit must be obtained from the Department of Mineral Resources in accordance with this Act.

### 6.1.16 Occupational Health and Safety Act

The Occupational Health and Safety Act, 1993 (No 85 of 1993) provides for the health and safety of persons at work; for the health and safety of persons in connection with the use of plant and

machinery; and the protection of persons other than persons at work against hazards to health and safety arising out of or in connection with the activities of persons at work. A number of regulations are published under this Act, including:

- Environmental Regulations for Workplaces (GN R2281 of 1987-10-16)
- Regulations for Hazardous Chemical Substances (GN R1179 of 1995-08-25)
- Asbestos Regulations, 2002 (GN R155 of 2002-02-10)
- Explosives Regulations (GN R109 of 2003-01-17)

#### 6.1.17 Mine Health and Safety Act

The Mine Health and Safety Act, 1996 (No 26 of 1996) provides for the protection of health and safety of employees and other persons at mines and serves -

- To promote a culture of health and safety;
- To provide for the enforcement of health and safety measures;
- To provide for appropriate systems for employee, employer and state participating in health and safety matters;
- To provide effective monitoring systems and inspections, investigations and inquiries to improve health and safety;
- To promote training and human resource development;
- To regulate employers' and employees' duties to identify hazards and eliminate, control and minimise the risk to health and safety;
- To entrench the right to refuse to work in dangerous conditions; and
- To give effect to public international law obligations of the Republic relating to mine health and safety.

#### 6.1.18 Transkei Decree (9 of 1992)

The purpose of the Transkei Decree is to consolidate and amend laws relating to the conservation, management, protection and commercial utilization of indigenous fauna and flora and their habitats on land, in fresh water and in the sea; excluding national parks. To provide for the establishment of national wildlife reserves, protected natural environments, limited development areas, camping areas, hiking trails and coastal conservation areas.

In terms of this decree, the coastal conservation areas applies to the 1 km strip along the entire former Transkei coastline (excluding Municipal land), which is measured from the high water mark of the seashore and relevant tidal estuaries to 1 km inland. The Decree makes provision for various forms of legislation to manage development and conserve, protect and control the utilisation of

indigenous fauna and flora within the coastal strip. This implies that any development within the 1 km coastal strip requires approval in terms of the Transkei Decree, 1992. The administration of this Decree is the responsibility of the Eastern Cape DEDEA. In the event of an environmental authorization being authorised (in terms of the EIA procedures), a development permit will be issued by DEDEA based on such environmental authorization. However the development site is not located within this 1 km strip.

This decree provides a number of schedules which protect indigenous endangered & protected Fauna & Flora. According to Chapter 3 permits are required from the Eastern Cape DEDEA should a person hunt, kill, capture, sell, buy, donate, receive, remove, disturb, interfere etc any endangered or protected fauna listed in the schedules of the Transkei Decree. According to Chapter 4 no person may without a permit from the Eastern Cape DEDEA be in possession of, pick, sell etc any endangered or protected flora listed in the schedules of the Transkei Decree.

## 6.2 Plans, Policies & Guiding Principles

### 6.2.1 Provincial Spatial Development Plan

The Eastern Cape has approved a Provincial Spatial Development Plan. The plan supports the view that the focus of development should be on developing nodes and areas where economic opportunities can be stimulated, particularly in the central and eastern areas of the province. The plan identifies key spatial development issues, main development nodes and zones where development should be encouraged. It aims to encourage consolidated settlement through the improved provision of infrastructure and facilities in targeted areas reinforcing the strategic advantages offered by coastal tourism nodes. For the coast in general the plan discourages linear development and places emphasis on the establishment of nodal developments to build on existing strengths and minimize environmental impacts. The plan also outlines environmentally sensitive areas where development should not be permitted. These are:

- State forests
- Dune forests and estuaries
- Within 30 meters of watercourses along major rivers
- Game reserves and nature sanctuaries
- Slopes steeper than 1:6
- Historic heritage sites
- River basin catchment areas

### 6.2.2 OR Tambo District Municipality - Integrated Development Plan (2010-2011)

The Municipal Systems Act 32 of 2000, Chapter 5 - part 3 prescribes that Municipal Council must review its Integrated Development Plan (IDP) annually in accordance with its performance measurements to the extent that changing circumstances so demand. This involves an assessment of the Municipality's performance and achievement of its targets and strategic objectives. The Council must also amend its IDP in accordance with a prescribed process. The IDP is annually reviewed to reflect the impact of successes, while corrective measures are applied to address development problems that may arise. This is done to ensure its relevance as the Municipality's Strategic Plan, informing other components of the municipal business processes including institutional development, financial planning, cyclical inter-governmental planning and budgeting. Section 26 of the MSA prescribes the following peremptory components that an IDP must reflect on:

- The municipal council's vision including the municipal critical developmental and transformation needs;
- An assessment of existing level of development in the municipality;
- The council's developmental priorities and objectives including its local economic development aims;
- The councils' development strategies which must be aligned to national and provincial sector plans;
- A spatial development framework which must include the provisions of basic guidelines for a land use management system;
- The council's operational strategies;
- Applicable disaster management plans;
- A financial plan, which must include a budget projection for the next three years; and
- The key performance indicators and performance targets determined in terms of section 41.

The Municipal Planning and Performance Management Regulations (2001) set out the following further requirements for an IDP:

- An institutional framework for implementation of the IDP and to address the municipality's internal transformation;
- Investment initiatives must be clarified;
- Development initiatives including infrastructure, physical, social and institutional development and;
- All known projects, plans and programmes to be implemented within the municipality by any organ of state.

The Municipal Finance Management Act (MFMA) provides for closer alignment between the Annual Budget and the compilation of the IDP.

To give effect to the said mandates, the IDP has been legislated as a planning mechanism to be adopted by municipalities (Chapter 5 of the MSA No. 32 of 2000). The council of O.R Tambo district municipality is reviewing an Integrated Development Plan (IDP) to adopt it for implementation during (2010/2011) financial year. The IDP as a strategic development plan is reviewed annually to guide all development in a municipal area and inform municipal budgeting and resource allocation. It also plays a pivotal role in informing all planning processes of the other spheres of government (National and Provincial) as well as all state owned enterprises. The development of an IDP as legislated in chapter 5 of the Local Government Municipal Systems Act No.32 of 2000, amongst others prescribes the content of such a plan (section 27 of this Act), as follows:

- The municipal council's vision for the long-term development of the municipality with special emphasis on the municipality's most critical development and internal transformation needs;
- An assessment of the existing level of development in the municipality, including identification of communities which do not have access to basic services;
- The council's development priorities and objectives for its elected term, including its local economic development aims and its internal transformation needs;
- The council's development strategies aligned with those of national and provincial sectoral plans and planning requirements binding on the municipality in terms of legislation;
- A spatial development framework including basic guidelines for land use management system for the municipality;
- The council's operational strategies;
- Applicable disaster management plans;
  - A financial plan and budget projection for the next three year; and
  - The key performance indicators and performance targets determined in terms of section 41 of the Municipal Systems Act.

The main purpose of an IDP is to foster more appropriate service delivery by providing the framework for economic and social development within the municipality. In doing so it:-

- i. Contributes towards eradicating the development legacy of the past.
- ii. Operationalizes the notion of developmental local government.
- iii. Foster a culture of co-operative governance.

Projects related to Roads and Transport includes the following:

**Table 1: Projects planned 2010/2011 Financial Year**

Department of Roads and Transport Projects planned 2010/2011 Financial Year					
Name of project	Indicative Budget	Location of project	Implementing agent	Project output	Duration
Wild Coast Meander Zithulele to Coffee Bay (Ph 1)	13,000	Port St Johns,	DORT	Tarred roads / Surfaced roads	Mar-11
Wild Coast Meander: Madwaleni Hospital Road (Ph 2)	20,000	KSD	DORT	Tarred roads / Surfaced roads	Mar-11
Greenville Hospital Road (Ph 2)	20,000	Mbizana	DORT	Tarred roads / Surfaced roads	Mar-11
R61 to Holy Cross Hospital	18,200	Mbizana	DORT	Surfaced Road	Mar-10
Continuation to Holy Cross Hospital	7,800	Mbizana	DORT	Surfaced Road	Aug-10
Ngqeleni to Mthatha Mouth	10,400	KSD	DORT	Surfaced Road	Nov-09
R61 Sitshayela to Tembukazi	11,700	Ngquza	DORT	Surfaced Road	Nov-10
Bizana to Port Edward (Magusheni-Mzamba)	600,000	Mbizana	DORT	Tarred roads / Surfaced roads	Mar-15
Phakade to Magusheni	220,000	Bizana , Ngquza	DOR	Tarred roads / Surfaced roads	Mar-11
T125: Siphetu Hospital	350,000	Ntabankulu	DOR	Tarred roads / Surfaced roads	Mar-11
Hluleka Road Project	28,000	Nyandeni	DORT	Tarred roads / Surfaced roads	Mar-11
Urban Renewal Lusikisiki	13,000	Ngquza	DORT	Tarred roads / Surfaced roads	Mar-11
Household Contractor Road Maintenance	34,000	KSD, Mhlontlo	DORT	Minor maintenance works (culverts cleaning, surface maintenance, grass cutting, control stray animals, etc.)	Mar-11
EPWP projects	8,360	7 Local Municipalities	DORT	Minor maintenance works (surface maintenance, fencing, grass cutting and bush clearing, etc).	Mar-11
DR 08313 to Canzibe Hospital	33,800	Nyandeni	DORT	Tarred roads / Surfaced roads	Jun-11
DR 08170 to Lutana Clinic	23,400	Mhlontlo	DORT	Tarred roads / Surfaced roads	Dec-10
DR 08026 & DR 08149 to Magwa Tea Plantation	22,100	Quakeni	DORT	Tarred roads / Surfaced roads	Oct-10

DR 08269 (Lindile)	5,200	KSD	DORT	Tarred roads / Surfaced roads	Sep-11
DR 08288 & DR 08033 & DR 08289 Mvezo Great Place and Museum	33,800	KSD	DORT	Tarred roads / Surfaced roads	Nov-12
DR 08167 to Tina Falls	19,500	Mhlontlo	DORT	Tarred roads / Surfaced roads	Jan-12
DR 08019 to Ntabankulu Town	14,300	Quakeni	DORT	Tarred roads / Surfaced roads	May-12
Flagstaff to Lusikisiki	300,000	Qaukeni	DORT	Tarred roads / Surfaced roads	Mar-12
Pt St Johns to Ntafufu	20,000	Port St Johns	DORT	Tarred roads / Surfaced roads	Nov-11
Mampube to Pt St Johns	35,000	Port St Johns	DORT	Tarred roads / Surfaced roads	Nov-11
N2 to Tabankulu	20,000	Ntabankulu	DORT	Tarred roads / Surfaced roads	Apr-12
Lusikisiki to Mbotyi	40,000	Ngquza	DORT	Tarred roads / Surfaced roads	Nov-11
Vidiesville to Mqaunduli	40,000	King Sabata Dalinyebo	DORT	Tarred roads / Surfaced roads	Feb-11
Magusheni to Flagstaff	20,000	Ngquzai/ Mbizana	DORT	Tarred roads / Surfaced roads	Nov-12
Lusikisiki Bambisane Hospital	35,000	Ngquza	DORT	Tarred roads / Surfaced roads	Mar-12
Mthatha Airport	R60, 000	KSD LM	DORT	Civil Works, Fencing, Terminal Bldg Upgrade, Fire detectors, Lift installation, Air conditioning and ventilation	Mar-12
Qumbu Bus and Taxi Rank	R 2 million	Mhlontlo	DORT	Bus and Taxi Rank	July 10 - June 2012

### 6.2.3 DWAF - Best Practice Guidelines

The Department of Water Affairs & Forestry developed a series of Best Practice Guidelines (BPG's) for mines that was released in 2009 in line with the international Principles and Approaches towards sustainability. These guidelines have been grouped as follows:

- BPG's dealing with aspects of DWAF's water management hierarchy, namely,
  - H1: Integrated Mine Water Management
  - H2: Pollution Prevention and Minimization of Impacts
  - H3: Water Reuse and Reclamation
  - H4: Water Treatment
- BPG's dealing with General water management strategies, techniques & tolls, namely,
  - G1: Storm Water Management
  - G2: Water and Slat Balances

- G3: Water Monitoring Systems
  - G4: Impact Prediction
  - G5: Water Management Aspects for Mine Closure
- BPG's dealing with specific mining activities or aspects, namely,
  - A1: Small-Scale Mining
  - A2: Water Management for Mine Residue Deposits
  - A3: Water Management in Hydrometallurgical Plants
  - A4: Pollution Control Dams
  - A5: Water Management for Surface Mines
  - A6: Water Management for Underground Mines

The development of the guidelines is an inclusive consultative process that incorporates the input from a wide range of experts, including specialist within the and outside the mining industry and government. The BPG's form the following main functions:

- Utilization by the mining sector as input for compiling water use license applications (and other legally required documents such as EIA's, EMP's, closure plans, etc) and for drafting license conditions.
- Serve as a uniform basis for negotiations through the licensing process prescribed by the National Water Act.
- Used specifically by DWAF personnel as a basis for negotiation with the mining industry, and likewise by the mining industry as a guideline as to what the DWAFG considers as best practice in resource protection and waste management.
- Inform Interested & Affected Parties on good practice at mines.

#### 6.2.4 Department of Environmental Affairs Guidelines

The Department of Environmental Affairs has also produced a series of guidelines to assist potential applicants and interested and affected parties (I&AP's) to understand what is required of them and what is required of them and what their role may be. The guidelines are intended to guide only and should be read in conjunction with NEMA and the regulations. They are not intended to be a substitute for the provisions of NEMA or the regulations in any way. The guidelines form part of the department's Integrated Environmental Management Guideline Series and consist of -

- Guideline 5: Companion to the National Environmental Management Act Environmental Impact Assessment Regulations of 2010
- Guideline 6: Environmental management framework
- Guideline 7: Public Participation

## 7 Primary Legislative Specifications

Primary Environmental Legislation governing the Scope of Work undertaken is:

- o GN R.1273: Mineral and Petroleum Resources Development Act, 2002, No. 28 of 2002.
- o GN R. 527: Mineral and Petroleum Resources Development Act, 2002, (No. 28 of 2002): Mineral and Petroleum Resources Development Regulations, 2004.
- o GN R.543: Environmental Impact Assessment Regulations in terms of section 24(5), 24M and 44 of the National Environmental Management Act, 1998;

The permitting of the materials sources required for the project will be undertaken in accordance with the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002). It must be noted that the applicant (Department of Roads and Public Works), as an organ of state, has obtained exemption from the provisions of sections 16, 20, 22 and 27 (application processes) of the M&PRDA in respect of any activity to remove any mineral for the construction and maintenance of dams, harbours, roads and railway lines and for purposes incidental thereto, as allowed for by the said Act in section 106 (1). As such the utilisation of the material sources is subject only to the preparation, submission and approval of an Environmental Management Plan compiled in accordance with requirements of the M&PRDA.

## **8 Responsibilities of the Role Players**

### **8.1 Developer**

The Developer (the Department of Roads & Public Works in this instance) remains ultimately responsible for ensuring that the development is implemented according to the requirements of the EMP. The developer is responsible for ensuring that sufficient resources (time, financial, human, equipment, etc.) are available to the other role players (e.g. the ECO, ELO and contractor) to efficiently perform their tasks in terms of the EMP. The Developer is liable for restoring the environment in the event of negligence leading to damage to the environment. The developer shall ensure that the EMP is included in the tender documentation so that the contractor who is appointed is bound to the conditions of the EMP. The developer is responsible for appointing an independent Environmental Control Officer (ECO) to oversee all the environmental aspects relating to the development.

### **8.2 Consulting Engineer**

The Consulting Engineer, is bound to the EMP conditions through his/her contract with the developer, and is responsible for ensuring that she/he adheres to all the conditions of the EMP. The Consulting Engineer shall thoroughly familiarise him/her-self with the EMP requirements before coming onto site and shall request clarification on any aspect of these documents, should they be unclear.

### **8.3 Contractor**

The Contractor, as the developer's agent on site, is bound to the EMP conditions through his/her contract with the developer, and is responsible for ensuring that she/he adheres to all the conditions of the EMP. The Contractor shall thoroughly familiarise him/her-self with the EMP requirements before coming onto site and shall request clarification on any aspect of these documents, should they be unclear. The Contractor shall ensure that he/she has provided sufficient budget for complying with all EMP conditions at the tender stage. The Contractor shall comply with all orders (whether verbal or written) given by the ECO/Contract Engineer in terms of the EMP.

### **8.4 Environmental Control Officer (ECO)**

The Environmental Control Officer (ECO) is appointed by the developer as an independent monitor of the implementation of the EMP. He/she shall form part of the project team and shall be involved in all aspects of project planning that can influence environmental conditions on the site. The ECO shall attend relevant project meetings, conduct inspections to assess compliance with the EMP and

be responsible for providing feedback on potential environmental problems associated with the development. In addition, the ECO is responsible for:

- Liaison with relevant authorities;
- Liaison with contractors regarding environmental management; and
- Undertaking routine monitoring and appointing a competent person/institution to be responsible for specialist monitoring, if necessary
- The ECO has the right to enter the site and undertake monitoring, auditing and assessment at any time, with the agreement of the Contractor, which agreement shall not be unreasonably withheld.

The ECO shall be responsible for liaising with the DMR. The ECO shall submit quarterly environmental audit reports to the authorities. These audit reports shall contain information on the contractor and developer's levels of compliance with the EMP. The audit report shall also include a description of the general state of the site, with specific reference to sensitive areas and any matters of non-compliance. The ECO is to suggest corrective action measures to eliminate the occurrence of the non-compliance incidents. In order to keep a record of any non-compliance, an Environmental Incident Record shall be kept.

## 8.5 Environmental Liaison Officer (ELO)

The contractor shall appoint an Environmental Liaison Officer (ELO) to assist with day-to-day monitoring of the construction activities. Any issues raised by the ECO shall be routed to the ELO for the contractors' attention. The ELO shall be *permanently* on site during the construction phase to ensure daily environmental compliance with the EMP and shall be ideally be a senior member of the contractor's management team. The ELO shall be responsible for ensuring that all staff members are adequately trained and aware of the EMP. The ELO shall be responsible for undertaking weekly environmental inspections (according to the criteria specified in the EMP), and accompany the ECO during site visits, audits or assessments.

## 9 Introduction & Overview

The **Department of Roads and Public Works** is responsible for the maintenance of the gravel roads network in the Eastern Cape Province through routine maintenance or re-gravelling contracts. The Department of Roads and Public Works has appointed a consortium of Engineering Consultants (RAMS Management Consultants) to manage the Road Asset Management System (RAMS) which includes the borrow pit management system. Controlab cc is the Professional Services for the conducting of Geotechnical Borrow pits. BESC have been appointed as independent environmental consultants by Controlab cc on behalf of Department of Roads and Public Works to undertake the necessary investigations and applications in order to obtain authorisation from the relevant authorities for the proposed works. To this end, an Environmental Management Plan as defined and required by the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002), has been prepared for the proposed utilisation of the borrow pits for the routine maintenance/re-gravelling of the ORTDM-IR03.

It is proposed that road construction materials be sourced from existing borrow pits located in the vicinity of the ORTDM-IR03. As mentioned previously, the utilisation of the material sources required for the project will be undertaken in accordance with the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002). Since the applicant, Department of Roads and Public Works, is an Organ of State, exemption has been obtained previously from the application process in terms of the Act. In terms of this exemption only an Environmental Management Plan for the utilisation of the borrow pits is required to be compiled in accordance with Section 39(2) and Regulation 52 of the M&PRDA

The purpose of the Environmental Management Plan is to identify and assess potential impacts associated with the project through a process of stakeholder and public consultation and environmental investigations, and to provide sufficient detail on the project to the Department of Minerals Resources (DMR), in order to allow DMR to make an informed decision on the project.

***It is also appropriate to highlight at this point that the Department of Mineral Resources may, in their Decision, reserve their rights to initiate criminal proceedings against the Consulting Engineer, contractor and/or any sub-contractors.***

It is proposed that material sources required for the project will be sourced from one (1) borrow pit located throughout the area (**Figure 1**).

Table 2: Summary Table of Borrow Pits.

Information	Borrow Pits
	ORTDM-IR03_BP01
Ownership of Land	Communal
Type of Material	Decomposed dolerite
New/Existing	Existing
Co-ordinates (Latitude)	31°21'24.30" S
Co-ordinates (Longitude )	29° 6'8.50" E
Nearest Village	Tafeni
Distance to access road	160m
Distance to nearest houses	30m
Presence of Servitude	Overhead power line
Proposed End Use	Closed & Rehabilitated

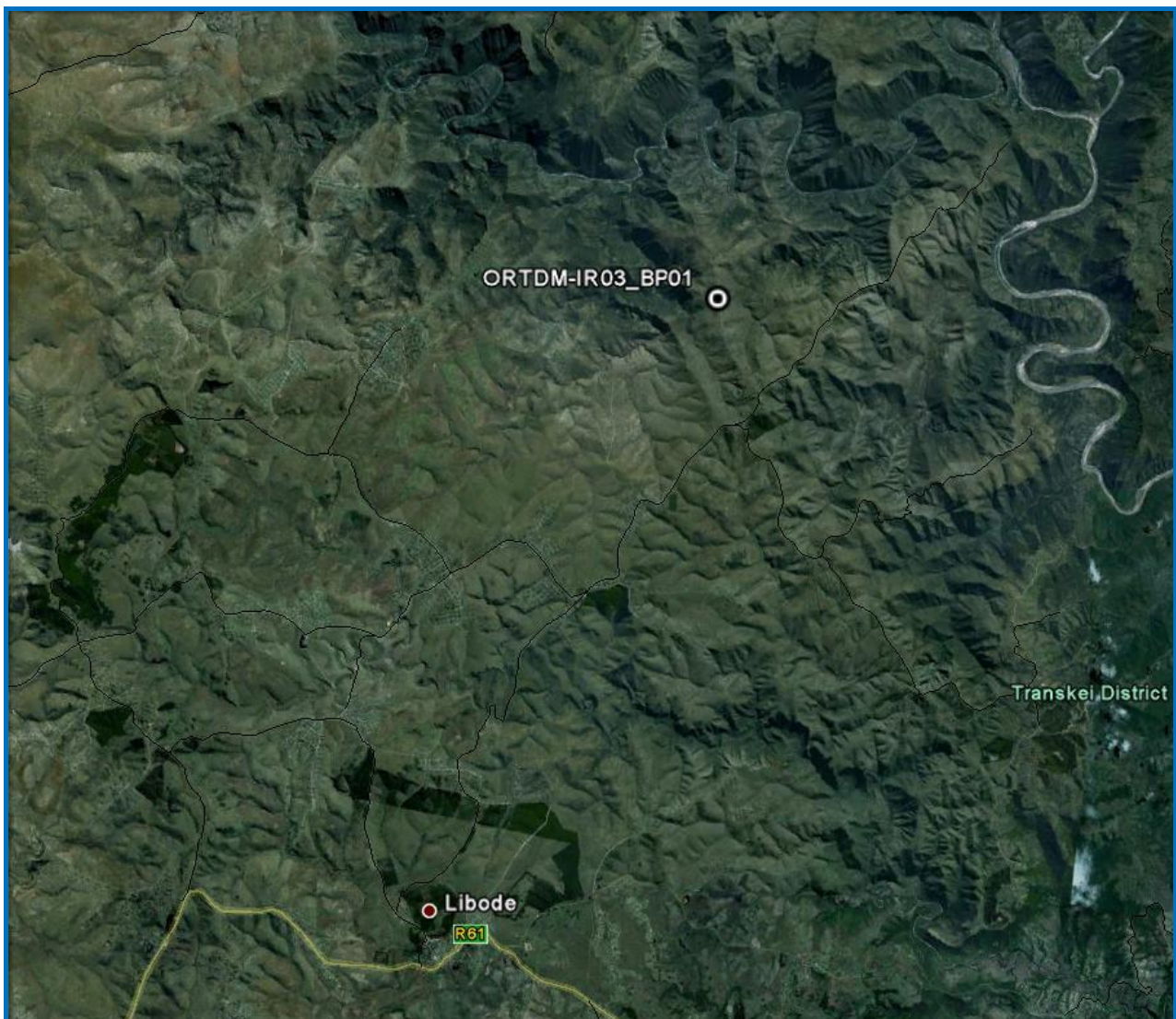


Figure 1: Aerial View - Borrow Pit location.

## 9.1 Objectives of the Environmental Management Plan

The overall objectives of the Environmental Management Plan are defined as follows:

- To fulfil the requirements of Sections 39 of the Minerals and Petroleum Resources Development Act;
- To fulfil the criteria described in regulations 52 of the Minerals and Petroleum Resources Development Regulations, 2004, Government Notice No. 527.
- To inform the public and key stakeholders of the Project and to provide them with an opportunity to express any concerns or issues and to participate in the process;
- To identify and assess potential impacts associated with the activity. A “fatal flaw” constitutes an impact of HIGH significance and which cannot be managed to an acceptable level;
- Identify proposed mitigation and management measures to minimize adverse impacts and benefits; and
- Planned monitoring and performance assessment of the environmental management plan.

## 9.2 Integrated Environmental Management

The Integrated Environmental Management (IEM) procedure, which is outlined in Chapter 5 of the National Environmental Management Act (Act 107 of 1998) (NEMA), provides a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. The general objectives of Integrated Environmental Management are to:

- Promote the integration of the principles of environmental management in the making of all decisions, which may have a significant effect on the environment;
- Identify, predict and evaluate the actual and potential impacts on the environment, socio-economic conditions and cultural heritage; the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts and maximizing benefits and promoting compliance with the principles of environmental management;
- Ensure that the effects of activities on the environment received adequate consideration before actions are taken in connection with them
- Ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment;
- Ensure the consideration of environmental attributes in management and decision-making which may have a significant effect on the environment; and

- Identify and employ modes of environmental management best suited to ensure that the particular activity is pursued in accordance with the principles of environmental management.

### 9.3 Project Details

#### **Applicant:**

The Department of Roads & Public Works  
Private Bag X0023  
BHISHO  
5605  
Tel No.: (043) 604 7636  
Fax No.: (086) 532 3972  
Contact Person: Mr. C.J. Xoko or Mr. C. Boshoff

#### **Environmental Consultant**

Biotechnology and Environmental Specialist Consultancy cc  
P O Box 8241  
Nahoon  
5210  
Tel: (043) 726 4242  
Fax: (043) 726 3199  
Email: conroy@besc.co.za  
Contact Person: Mr. Conroy van der Riet

#### **Landowner/Custodian**

Borrow Pits #	Property/Allotment Name	Landowner/Custodian
ORTDM-IR03_BP01	FARM RE/36	Department of Rural Development and Land Reform

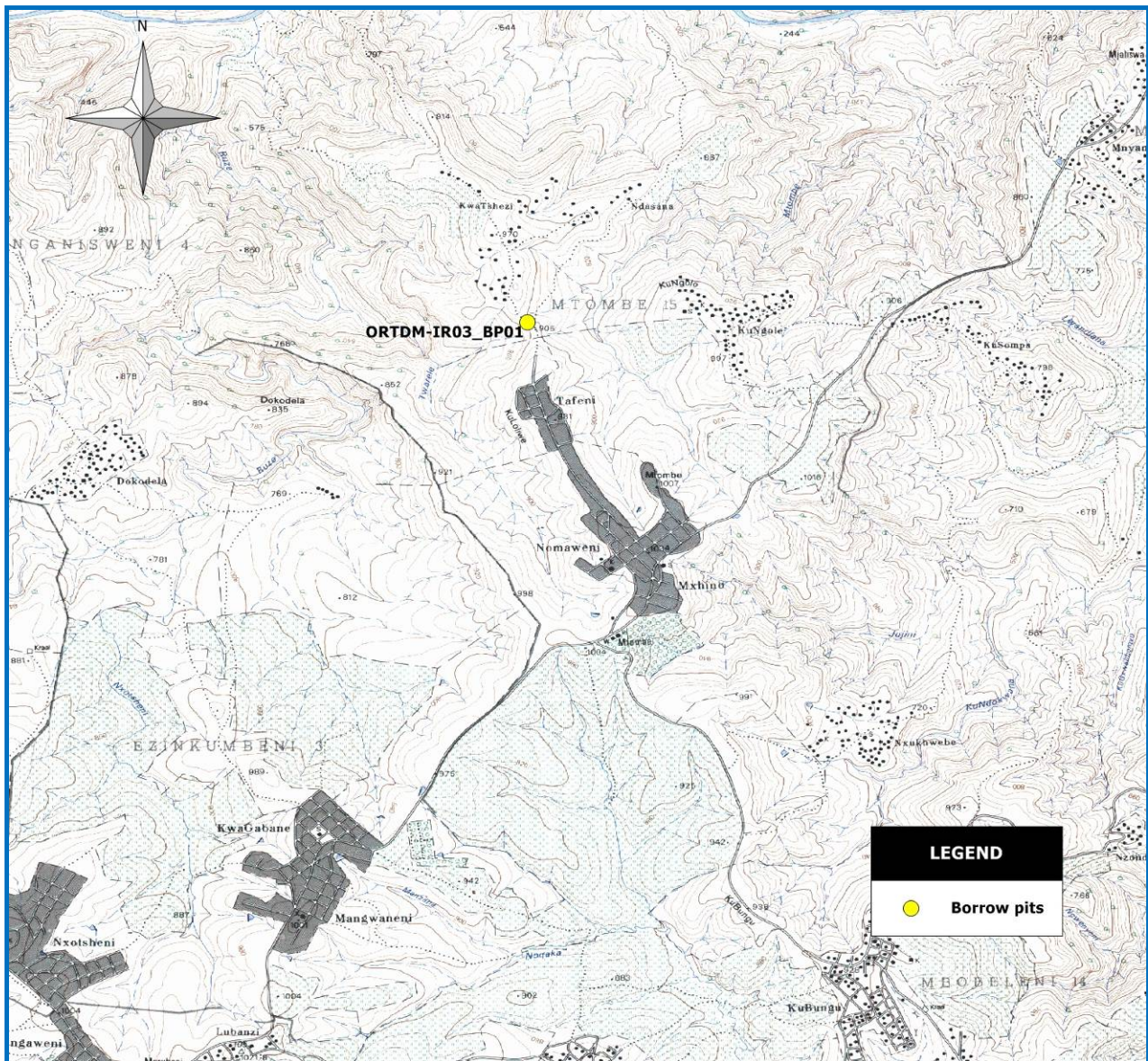
## 10 Need and Desirability

The existing gravel roads in the OR Tambo District Municipality are in serious need of maintenance and re-gravelling. The region in particular has recently experienced severe weather conditions which has resulted in severe deterioration of the road conditions and has exacerbated the need for maintenance and re-gravelling of the existing gravel roads. The proposed maintenance/re-gravelling of the ORTDM-IR03 will be a benefit to the users of the road by providing proper infrastructure, and improving overall road safety. The proposed borrow pits will provide material for the maintenance/re-gravelling of the ORTDM-IR03. The identification of these sources follows a materials identification/investigation undertaken by Controlab. A copy of this report can be found under **Appendix C**. The material from the borrow pits were concluded to be suitable for use and that they would yield high quantities of material for the maintenance of the road. As part of the measures to be taken for the borrow pits, rehabilitation is required on closure of the mining, this rehabilitation would be positive impact as this should improve the overall aesthetics of the borrow pits which are currently a visual scar on the landscape, having had no rehabilitation undertaken on them in the past. Rehabilitation should also reduce the potential erosion and subsequent sedimentation of rivers/streams.

## 11 Description of the Borrow Pits

It is proposed to use one (1) borrow pit for the provision of material for the upgrade/re-gravelling of ORTDM-IR03. All of the borrow pits have been previously mined. The borrow pits will be used exclusively for the upgrade/re-gravelling of ORTDM-IR03 and will be rehabilitated and closed on completion of the works.

A number of alternative borrow pits were investigated. A selection process was undertaken whereby the borrow pits having fatal flaws or limited resources were eliminated during the planning process using indicators such as existing/non-existing borrow pits, surrounding land use, materials present, volume of available material, distances to water courses, land use, land capability, vegetation sensitivity, surrounding erosion, visibility, slopes, etc.



## 11.1 Borrow Pit ORTDM-IR03\_BP-01



Figure 3: Aerial view - ORTDM-IR03\_BP01.



Figure 4: Photo - ORTDM-IR03\_BP01.

### **General Description**

ORTDM-IR03\_BP01 is an existing borrow pit which has been used extensively in the past and is currently being utilised. It is located on the side of a south-east facing hill. The site is accessed by an unpaved/gravel road which has its intersection on the DR08038. The nearest houses are located +/- 30m from the borrow pit. It is the intension that the borrow pit will be mined from the existing borrow pit face in a northerly direction and within the footprint of the existing borrow pit as indicated on the mining plan (**Appendix B**). It will not be necessary to relocate any households.

Prior to mining the access road will be demarcated to prevent vehicles damaging natural vegetation. Existing access to the borrow pit will be utilised to allow for trucks to access the working face. The entire mining area will be fenced to prevent unauthorized access of both humans and livestock. The area to be fenced will be bigger than the area to be mined to allow for a storage area for topsoil & overburden (to be stored separately).

Site preparation will consist of the stripping of topsoil and overburden into stockpiles, which are to be stored separately. Existing topsoil stockpiles will be shifted out of the way to allow for mining of the material beneath. The topsoil and overburden material will be stockpiled on site and after the mining is complete this material will be spread over again. Once the whole area is open the stockpile can be moved around so as not to interfere with the mining process.

The material will be excavated from the face and floor of the borrow pit and if possible loaded directly onto haul trucks. It is proposed that the extent of the area to be mined will be approximately 0.613ha.

### **Proposed Rehabilitation Measures:**

Stormwater control is viewed as a critical component of the borrow pit development. It is suggested that a stormwater cut- off berm be located upslope from the borrow pit face, protecting the active mining area, topsoil and overburden stockpiles from erosion. This storm water will then be channelled towards the natural drainage in the area. A diversion berm with dissipation beds should be installed down slope of the mining area to filter out any sediment washed off the site during heavy rainfall.

On completion of mining, the faces must be sloped to a 1:2 - 1:3 slope and overburden and then topsoil (imported if required) will be spread over the surface of the mining area. The access roads

will be ripped. The entire area will be fertilized and hydroseeded with an indigenous grass mix which includes quick-growing pioneers and climax species. The stormwater berms and dissipation beds will be retained on closure. Additionally, near vertical slopes (1:1 to 1:2) should be stabilised by natural rock wall structures using conventional building methods or in forms with slurry forced between the structures. All structures must have a 'natural' look and facilities for plants to grow in. All areas where the slopes are 1:3 to 1:6 should be logged or otherwise stepped (using stabilisation cylinders or similar) in order to prevent soil erosion. Logs/ cylinders should be laid in continuous lines following the contours and spaced vertically 0.8-1.2 m apart, depending on the steepness of the slope. These logs/ cylinders must be secured by means of steel pegs and wire in rocky areas, and treated wooden pegs in other areas. Inspections will be undertaken during the project liability period (one year after completion of the contract) to ensure that no erosion has taken place and to monitor the success of the revegetation. Should any damage occur, the necessary repair works will be undertaken. The intention is to establish an 80% grass cover within two years of rehabilitation. Should this not be achieved, it may be necessary to lightly rip, fertilise and reseed the site. The fence will be maintained by the contractor until the end of the contracts liability period.

## 12 Description of the Environment

### 12.1 Landform & Geology

#### 12.1.1 Geology & Soils

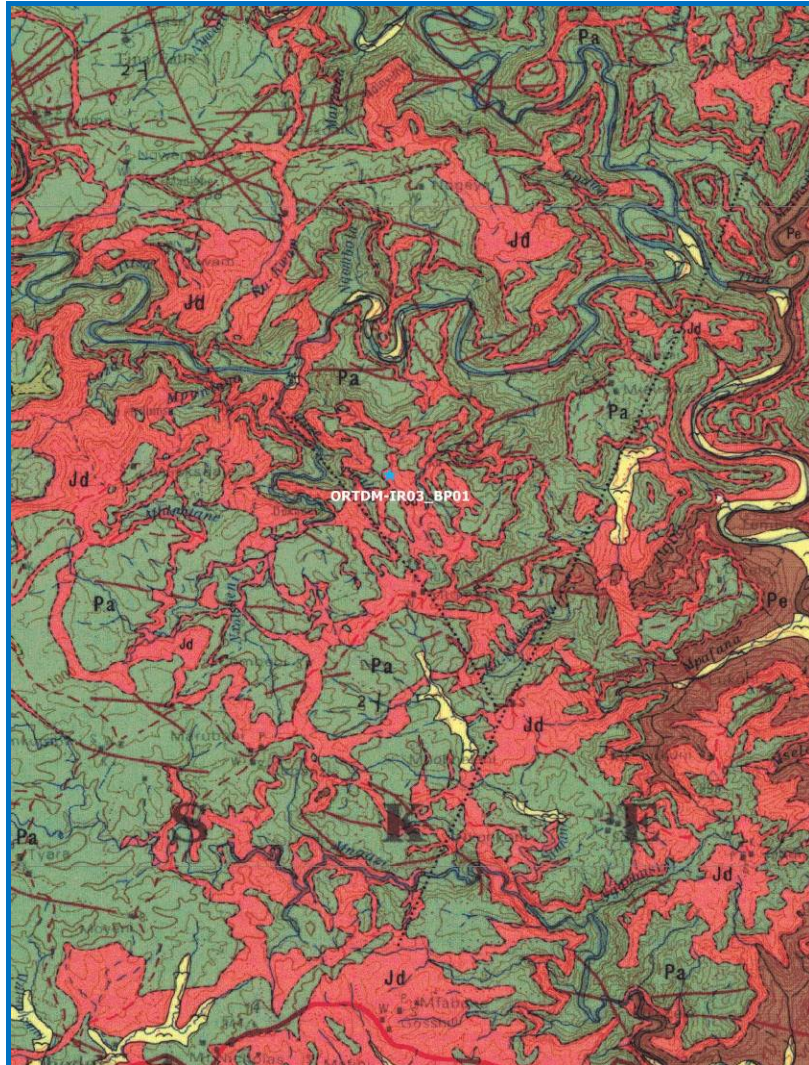


Figure 5: The geology of the study area

The general area is underlain by horizontal to very gently dipping rocks of the Karoo Supergroup (shale, mudstones and sandstones) with dolerite intrusions often in the form of ring structures. Soils are poorly developed, being shallow and rocky and mostly not suitable for crop production. In general shallow residual soils and rock occur on hilltops with talus on the slopes and slightly deeper residual soils in the valleys.

The study site is underlain by dolerite belonging to the Burgersdorp formation falling under the Tarkastad subgroup. This subgroup falls under the Beaufort Group which belongs to the Karoo Sequence. (Figure 5).

The Burgersdorp formation consists of alternating fine- grained lithofeldspathic sandstone and greyish - red mudstone lithosomes, which constitute the relatively mudstone-rich upper part of the Tarkastad Subgroup. Sandstone on average forms 20 to 30% of this formation; 26% sandstone being measured in a 100 m thick section at Nonesi's Nek north-east of Queenstown. It becomes more abundant, however, towards the base and the top of the formation. The Burgersdorp Formation in the Queenstown area is probably in the region of 900 m thick.

The sandstone and mudstone lithosomes of the formation generally form fining-upward cycles ranging from a few metres to a few tens of metres in thickness, the average being in the order of 10 to 20 m. These cycles commence with sandstone which rests with a sharp contact on a scoured surface and grades upwards into the overlying mudstone lithosome. An intraformational mud-pebble conglomerate is often present at the base of the sandstone units. Individual sandstone lithosomes range up to about 10 m in thickness, averaging at 2 - 3 m. The sandstones vary from light brownish grey through light olive grey and greenish grey to light grey in colour. Flat bedding (accompanied by parting lineation), trough cross bedding and micro cross lamination (towards the top of the units) are the most abundant primary structures within the sandstones. The average Burgersdorp formation sandstone is moderately sorted, fine grained and lithic.

The Burgersdorp formation mudstone lithosomes range from a few tens of metres in thickness. The mudstone is generally greyish red to dusky red, less commonly medium greenish grey or medium bluish grey. Apart from the occasional presence of sand - filled mudcracks and clastic dykes, the mudstones are essentially massive.

The investigation undertaken by Controlab indicated that the borrow pit comprised of the following material:

Borrow Pit #	Material Source
ORTDM-IR03_BP01	Decomposed dolerite

### 12.1.1.1 Erodibility Index

Erodibility of soils can be described as the sensitivity of soils to the effects of wind and water on the soil structure. This property is expressed as an erodibility index, where low values indicate high potential for erosion, and high values correspondingly indicate a low potential for erosion.

The erodibility index is determined by combining the effects of slope and soil type, rainfall intensity and land use. These aspects are represented by terrain morphology, mean annual rainfall and broad land use patterns.

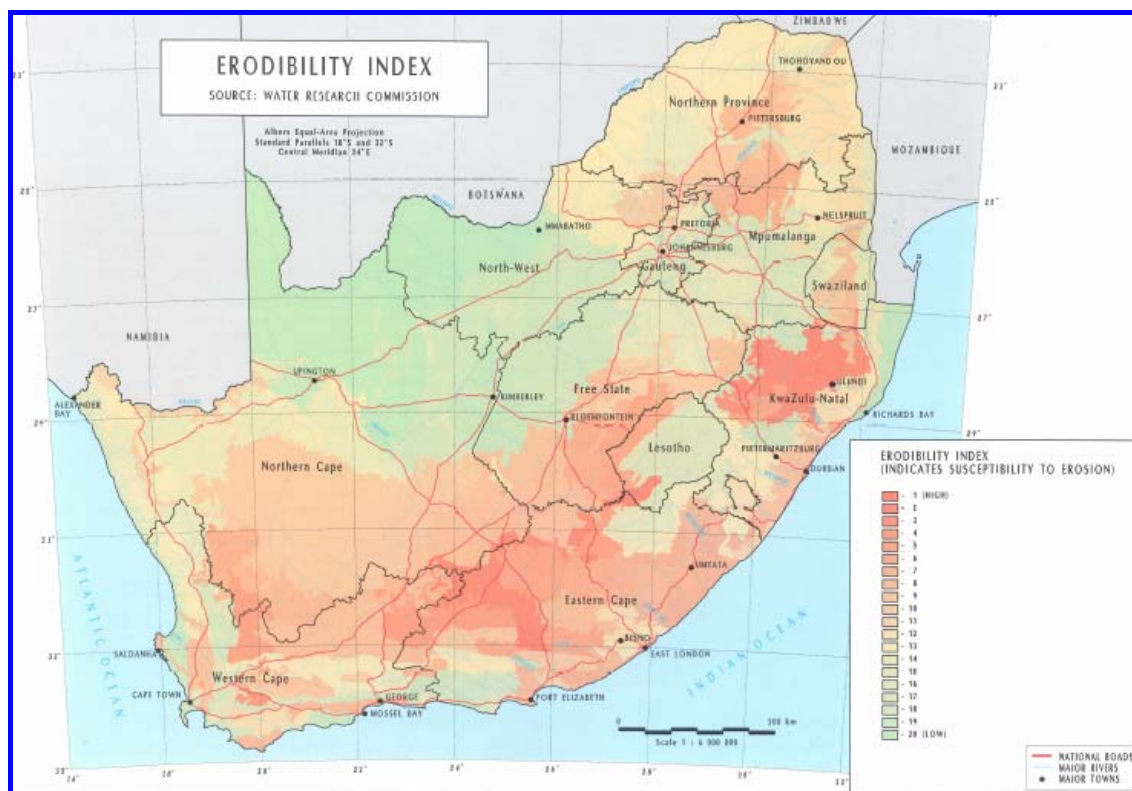


Figure 6: Erodibility Index

According to the Environmental Potential Atlas for South Africa, the study area falls within an Erodibility Index of between 7 and 9, which is at the lower end of the scale ( 1 being High and 20 being Low), indicating that the area is moderately to highly susceptible to erosion.

### 12.1.2 Topography and Drainage

The topography of the area consists of the high mountains of the Drakensberg in the interior with the rugged foothills of the mountains falling to a hilly central plateau which is bounded along its south-eastern edge by a coastal strip consisting of very steep grassy hills separated by numerous deeply incised valleys. The OR Tambo area has one large river, Umzimvubu and two medium -

sized rivers, Mthatha and Umthamvuna as well as a number of smaller coastal rivers with limited catchments that stretch no more than 60 km inland. It is these smaller coastal rivers and their estuaries that give the Wild Coast much of its character as they form deeply incised and highly meandering valleys.

## 12.2 Archaeology, Palaeontology & Heritage Sites

The Beaufort Group is Late Permian (255 million years) to Mid Triassic (237 million years) in age. Characteristic fossils include fish, amphibians and reptiles with a dominance of mammal-like reptiles (Therapsids). In addition, characteristic fossils include plant fossils of the *Glossopteris* flora with occasional invertebrate fossils (freshwater bivalve molluscs). Most of the fossils specimens represent groups that are now extinct. It is estimated that less than 5% of sites have been identified in the Eastern Cape. There is a lack of identified sites in the district.

A Phase 1 Archaeological Impact Assessment and Palaeontological Impact Assessment were conducted and findings of such can be found under **Appendix C**.

## 12.3 Climate

Due to its location at the confluence of several climatic regimes, the most important of which are temperate and subtropical, the Eastern Cape has a complex climate. There are wide variations in temperature, rainfall and wind patterns, largely as a result of movements of air masses, altitude, mountain orientation and distance from the Indian Ocean. Exceptionally high temperatures may be experienced during berg wind conditions, which occur frequently during the winter, with maximums of well over 30°C not being uncommon. Extreme temperatures also occur during summer, with little accompanying wind. Areas closer to the coast experience cooling due to onshore sea breezes.

The climate of the coastal lowlands of the region is generally moderate, warm temperate and humid and does not experience wide fluctuations in temperature due to the influence of the warm Agulhas current.

No climate data is available for the immediate area; however in general the climate for the area lies within the transitional zone between the subtropical KwaZulu-Natal coast and the warm temperate Eastern Cape. The climate ranges from cool, humid and subtropical at the coast to hot and sub-arid inland. Maximum temperatures in summer fall mainly within the 25-27°C range, with the areas on the coast and the north western regions reaching up to 29°C. Small isolated regions in area have maximum temperatures of less than 25°C in summer. The winter minimum temperatures for

coastal region are generally above 8°C, while inland the minimum temperature can drop to between 2-4°C in winter.

Rainfall in the area occurs mainly in summer, but the winter months are not completely dry, with about 30% of the annual rainfall occurring between April and September. There is a great variation of the quantity of rainfall throughout the area. The mean annual precipitation (MAP) along the coastal region ranges from a low of 600mm in the west to a high of 1 208mm in the east, and varies from 400mm to 1200mm in the central plateau and along the northern areas. The rainfall is generally higher in the east than in the west.

The relative humidity is higher in summer than in winter. It is generally highest in February (the daily mean ranges from 60% in the north-west to 82% in the south-east) and lowest in July (the daily mean ranges from 50% in the north-west to 72% in the south-east). Average potential mean annual gross evaporation (MAE) (as measured by Symons-pan) for the WMA ranges from 1700mm in the north-west to less than 1200mm in the south-eastern parts.

## 12.4 Flora

### 12.4.1 General vegetation

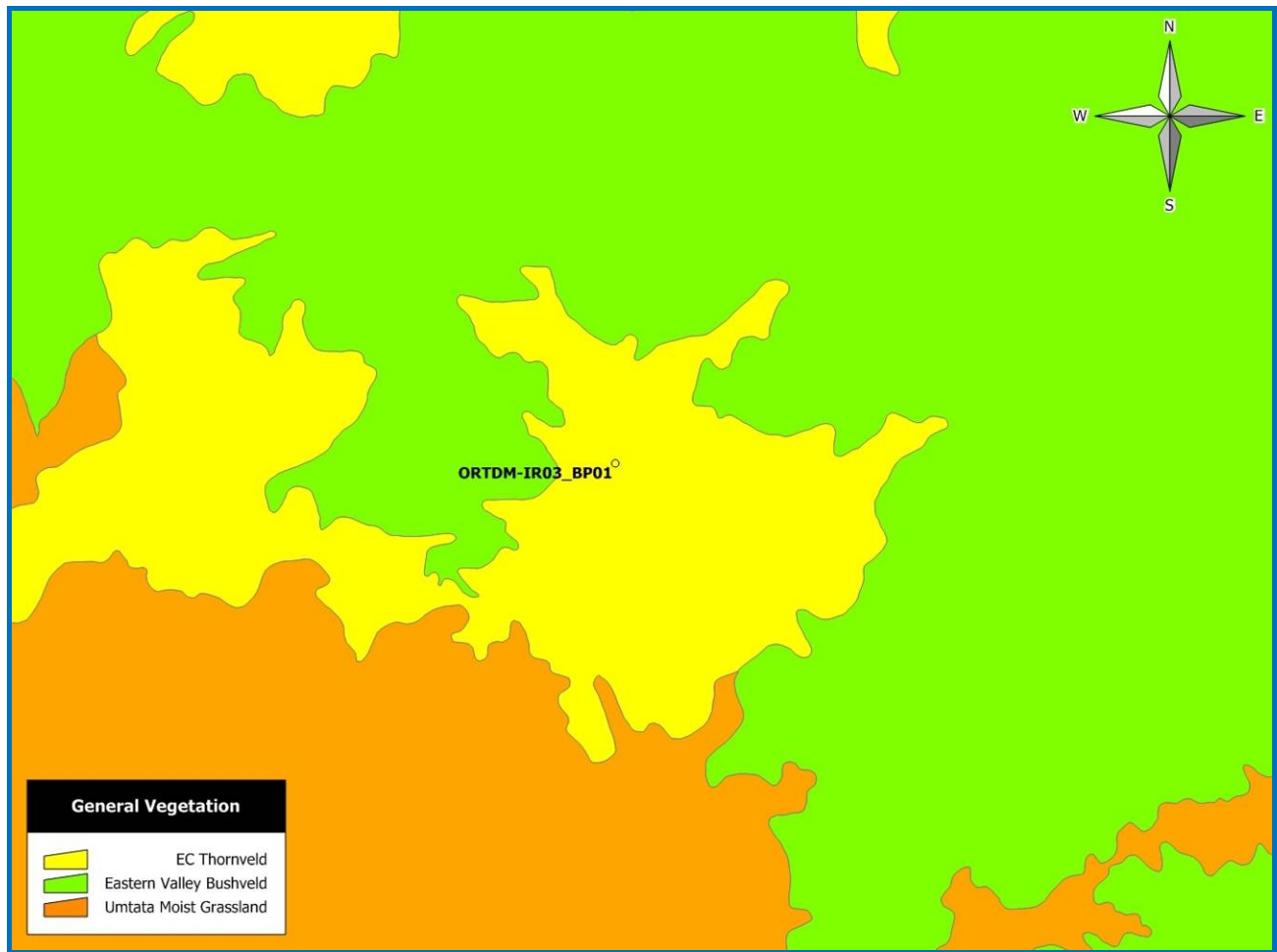


Figure 7: General vegetation.

The borrow pits falls within Eastern Cape Thornveld according to Mucina & Rutherford (2006).

The Bhisho/Eastern Cape Thornveld is found in the Eastern Cape from near Mthatha in a band parallel to but inland of the coast to north of East London, turning to run along the southern side of the Amathole Mountains as far as Fort Beaufort. It is also on dissected hills and low mountains around Grahamstown, especially to the southwest, and in a few fragments in valleys northeast of the Amathole Mountains at altitudes mostly 200-700 m. The vegetation unit is located on undulating to moderately steep slopes, sometimes shallow, incised drainage valleys. Open savanna characterised by small trees of *Acacia natalia* with short to medium, dense, sour grassy understorey, usually dominated by *Themeda triandra* when in good condition. A diversity of woody species also occurs, often increasing under conditions of overgrazing.

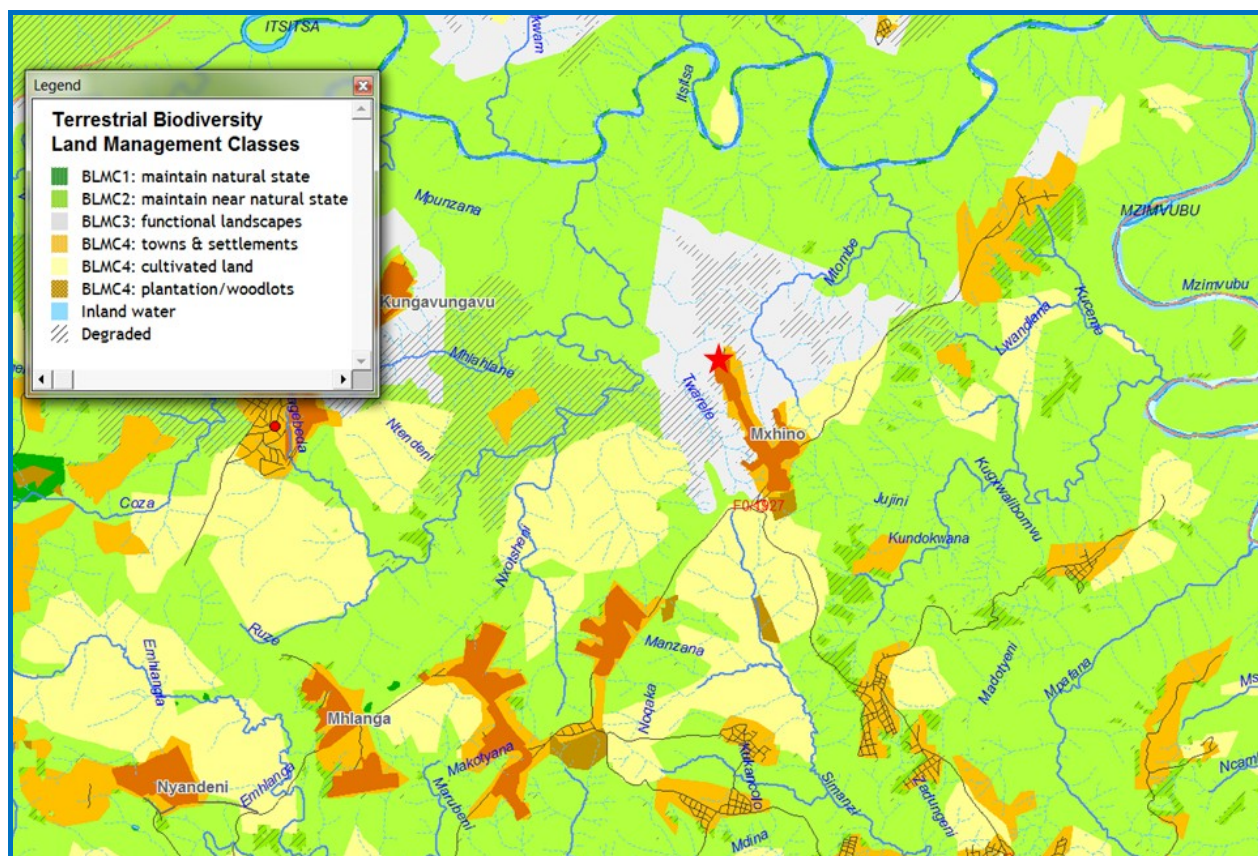
In terms of its conservation status, it is classified as least threatened. The conservation target of this unit is 25%. Some 20% of the unit is transformed mainly for cultivation, urban development and plantations. Only 0.2% is statutorily conserved in the Double-drift and Thomas Baines Nature Reserves. About 2% is conserved in private reserves such as Shamwari Game Reserve, Rockdale Game Ranch and Fourie Safaris Game Farm.

#### 12.4.2 Eastern Cape Biodiversity Conservation Plan

A Biodiversity Land Management Class (BLMC) refers to the desired ecological state that a parcel of land should be kept in so as to ensure biodiversity persistence (designations may be at the scale of habitat patch, landscape or catchment). It can be described using sets of ecosystem condition indicators, referred to as Limits to Acceptable Change indicators (or LACs). LAC values are assigned for each BLMC to describe upper limits for the degree of acceptable ecological change or impact that any proposed land-use change may bring about without compromising the designated ecological state.

The borrow pit is located in the following BLMC units (**Figure 8**):

- BLMC 4: Towns & Settlements - where the objective is to manage land to optimize sustainable agricultural production.
- Degraded Lands - Areas that have been degraded due to bad land use management practices and rural settlements.



The ECBCP may however have significant limitations in that there may be significant differences between the ECBCP description of land use and condition and the actual land use, condition and environmental status. The site is an existing borrow pit utilised in the past and as such the area has been transformed/disturbed.

### 12.4.3 Protection status and legislation and Species of Special Concern

While only a preliminary botanical investigation was undertaken, it was observed that most of the indigenous vegetation in the area of the borrow pits was not protected or endangered species. It was noted however that along the fence of a nearby household ( $\pm 30\text{m}$  away) there was a stand of *Aloe striatula*. *Aloe striatula* is protected under the Cape Nature and Environmental Conservation Ordinance of 1974. The mining plan has none the less been designed in such a way as to avoid disturbance of the nearby household fence and associated Aloes. If any of these Aloe species need to be removed then consent must be obtained from the relevant landowner prior to their removal.

#### 12.4.4 Alien Invasive Plant species

There were no declared alien invasive plant species present within or around the area of the borrow pit.

### 12.5 Fauna

#### 12.5.1 Reptiles & Amphibians

Of the 480 reptiles recorded from South Africa at least 144 of these occur within the Eastern Cape, and comprise eleven chelians (including sea-turtles, terrapins and tortoises), eighty-two lizards, and forty-six snakes. Reptiles form an important component of vertebrate diversity within the area. This is particularly true in light of their low mobility and high habitat specificity, particularly lizards and tortoises.

Approximately 60 species of reptiles may occur in the area. Whilst some are wide-ranging species (e.g. snakes such as the boomslang and puff adder), others have relatively restricted distributions. Sensitive and localised species may include the common slug-eating snake (*Duberria lutrix*) and the giant legless skink (*Acontias plumbeus*). Venomous snakes in the area include the Boomslang (*Dispholidus typus*), Ringhals (*Hemachatus haemachatus*), Cape Cobra (*Naja nivea*), Common Night Adder (*Causus mombeatus*) and Puff Adder (*Bitis arietans*); however there are few bites to humans and livestock.

The Province contains 19 threatened reptiles, of which 18 are endemic to the Eastern Cape, none of which are included in the SA RDB for reptiles and amphibians.

Species such as the Natal Black Snake (*Macrelaps microlepidotus*), occurring in coastal forests, reaches its southern limit in the East London area, the Green Sea turtle (*Chelonia mydas* - SA RDB status -vulnerable), the Loggerhead Sea Turtle (*Caretta caretta* -SA RDB status - vulnerable), the Hawksbill Sea Turtle (*Eretmochelys imbricate* - SA RDB status - vulnerable) and the Leatherback Sea Turtle (*Dermochelys coriacea* - SA RDB status - vulnerable) occur in the Eastern Cape coastal waters.

There are 102 amphibian species recorded in South Africa and about 47% of these occur in the Eastern Cape. One of these is an Artholeptid (frog), one is a Pipid (aquatic frog), three are Helephrynids (frogs which live in mountain streams and are endemic to South Africa), nine are Bufonids (true frogs) three are Bevicepids (stout bodied frogs), twenty-one are Ranids (frog family) and nine are Hyperolids (reed frogs). The amphibians of the province are an important component

of the vertebrate diversity of the province. There are six threatened and four endemic frog species in the Eastern Cape Province. One species, *Heleophryne hewitti*, is critically endangered and known for only four rivers in the Elandsberg range.

The Pondoland amphibian fauna is relatively poorly known, as is much of that of the former Transkei. This is unfortunate as the region falls at an important transition zone between a southern temperate amphibian fauna, and a tropical fauna that extends along the coastal littoral in association with the warm waters of the Agulhas Current (Poynton, 1990). The known amphibian fauna includes approximately 31 species. New taxa may well still exist in the poorly studied forest patches, river gorges and coastal grasslands. Species currently known only from coastal locations may also have relict inland populations.

### 12.5.2 Mammals

A total of three hundred and thirty eight mammals are recorded for South Africa, of which 128 (44%) are recorded from the Eastern Cape. Of this 128 species, only one species is endemic to the Eastern Cape. This species is the Giant Golden Mole (*Chrysospalax trevelyani*) that inhabits the indigenous forests of the Eastern Cape and is locally abundant in some regions. A list of recorded mammal species of the Eastern Cape region is presented in Appendix F. Species which have been extirpated within historical times in the Eastern Cape include the cheetah, hunting dog, hippopotamus, lion, warthog and red hartebeest. These have however been extensively reintroduced into the province in provincial and private game reserves. The few large megaherbivores surviving in the region include the ubiquitous bushbuck (*Tragelaphus scriptus*), common duiker (*Sylvicapra grimmia*), and Cape Grysbok (*Raphicerus melanotis*). In addition, Chacma baboon (*Papio ursinus*), Vervet Monkey (*Ceropithecus aethiops pygerythrus*), bush pig (*Potamochoerus porcus koiropotamus*) and a variety of small carnivores (viverids, genets, Cape Clawless Otter, etc) survive in small pockets. All are non-threatened, and many have successfully adapted to surviving in peri-urban areas, where some may become pests.

In the Eastern Cape area the dominant small mammal species associated with Coastal Grasslands and Acacia Savannah are *Rhabdomys pumilio* (Striped mouse) and *Otomys irroratus* (vlei rat). Other relatively common animals include various mole species, mole rats, *Orycteropus afer* (Aardvark) and *Cynictis penicillata* (Yellow Mongoose).

Fifteen threatened large- to medium-sized mammals occur in the Eastern Cape Province (Table 3).

Table 3: Terrestrial mammal Red Data Book (RDB) species.

SPECIES	COMMON NAME	CONSERVATION STATUS
<i>Lycaon pictus</i>	Wild dog	Endangered
<i>Hyaena brunnea</i>	Brown hyena	Rare
<i>Proteles cristatus</i>	Aardwolf	Rare
<i>Felis nigripes</i>	Black-footed cat	Rare
<i>Felis serval</i>	Serval	Rare
<i>Panthera pardus</i>	Leopard	Rare
<i>Philantomba monticola</i>	Blue duiker	Rare
<i>Mellivora capensis</i>	Honey badger	Vulnerable
<i>Felis lybica</i>	African wild cat	Vulnerable
<i>Orycteropus afer</i>	Aardvark	Vulnerable
<i>Equus zebra</i>	Cape Mountain zebra	Vulnerable
<i>Diceros bicornis</i>	Black rhinoceros	Vulnerable
<i>Ourebia ourebi</i>	Oribi	Vulnerable
<i>Manis temminckii</i>	Pangolin	Vulnerable
<i>Felis nigripes nigripes</i>	Small-spotted cat	Rare

### 12.5.3 Birds

The former Transkei region has a rich avifauna, with nearly 500 species recorded from the region (approximately half of the species recorded from the subcontinent). They include numerous sensitive and threatened species. The coastal mosaic of grassland and forest habitats serves as an important area for montane species in winter. Many Intra-African summer migrants also use the region both for breeding and in transit to more southerly areas. The Eastern Cape Province contains 62 threatened bird species. Many of them are associated with wetlands or are grassland species, highlighting the declining condition of these ecosystems. As can be expected from this highly mobile group there are no Eastern Cape endemic birds, although nine bird species are South African endemics. Only *Accipiter melanoleucus* (Black sparrow hawk) has Red Data Book status, but this species is no longer considered threatened.

### 12.5.4 Invertebrates

Although no regional Red Data Book exists for many invertebrate groups, a number of species in diverse groups have been identified as being of conservation concern and are discussed below.

- A number of rare butterflies from the Pondoland region are included in the South African Butterfly Red Data Book, including:
  - Pondoland Charaxes (*Charaxes pondoensis*) - Rare, Port St. Johns, Mkambati NR. Amakoza Rocksitter (*Durbania amakosa albescens*), Rare, Margate.
  - Southern Aslauga (*Aslauga australis*) - Rare, East London, Mbashe River, Doutza Pass, Port St. John's.

- Bicolored Abantis (*Abantis bicolor*) - Rare, East London, Mbashe River, Port St. John's.
- Pulmonate Molluscs - Two terrestrial slugs have been indicated as candidates for inclusion in the IUCN 'Red List' of threatened species. These include:
  - *Chlamydephorus burnupi* - known from a few scattered localities in KwaZulu-Natal, and with a single record from Port St. Johns.
  - *Chlamydephorus dimidiatus* - known from a few scattered localities in KwaZulu-Natal, and with a single southern record from Mtamvuna Gorge.
- Cicadas - Due to their long, unusual life cycles, cicadas are known to be sensitive to habitat fragmentation. These large, noisy and enigmatic insects show high levels of endemism and a number of new, highly-localised species have been described from the former Transkei region. Both are recorded from coastal forest, thicket and forest fringes.
  - *Stagira pondoensis* is known only from Port St John and nearby Vernon Crookes Nature Reserve in KwaZulu-Natal.
  - *Nyara thanatolica* occurs at Port St Johns and Bosbokstrand. This taxon is taxonomically more important as it is a monotypic genus.
- Millipedes - Like cicadas, millipedes often show high levels of endemism. Moreover, the distribution of endemism is often discordant with that of other groups. Although there is no updated review of southern African millipedes highlighting threatened taxa, a new species has recently been described from forest habitat in the Lusikisiki District.
- Archaeid spiders - The Afrotropical Archaeidae is a small family of very rare spiders known from southern Africa, Madagascar and Australia. In the subcontinent is represented by two genera and 12 species. *Eriauchenius coronatus* is known from only two specimens and is endemic to the Vernon Crookes Nature Reserve where it inhabits grassland at the forest-grassland ectotone. Two endemic species of *Afrarchaea* have been described from leaf litter in isolated coastal forests in the Eastern Cape, including *A. haddadi* (Komga, Kei Mouth) and *A. woodae* (Komga and Cwebe Nature Reserve).

## 12.6 Socio - Economic Environment

The O.R. Tambo DM is classified as a Category C2 municipality, indicating a largely rural character (it is estimated that some 93% of the district population resides in rural areas with a consequent dispersed settlement pattern) and low urbanization rate, as well as limited municipal staff and budget capacity.

All, but King Sabata Dalindyebo (KSD), local municipalities are classed as Category B4 (rural, mainly subsistence) reflecting limited institutional capacity and areas characterized by small centres, limited SMME's and market opportunities, dependence on public support and LED activities that are principally at the level of the small project. KSD is classed as a Category B2 (large core town/s with surrounding agricultural areas) municipality reflecting reasonably adequate budgets and staff, urban centre(s) with associated resources where LED activities are emerging into strategies and programmes to take advantage of economic potential, as well as substantial numbers of SMMEs, considerable market opportunities, but limited private sector business development services.

The total population of O.R Tambo district amounted to 1,843,135million in 2007, (growing at an average of 0.5% per annum) which is approximately 26, 6% of the total for the Eastern Cape Province.

Since 2001, the following annual average economic growth rates (in terms of GDP) have been measured in each of OR Tambo's local municipalities (2001 to 2007 at constant 2000 prices):

- Mbizana - 2.4%
- Ntabankulu - 1.6%
- Ingquza Hill - 2.2%
- Port St Johns - 3.1%
- Nyandeni - 2.1%
- Mhlontlo - 1.5%
- King Sabata Dalindyebo - 3.7%

The economic sectors that dominate the economy of the district are community services, financial and business services, and wholesale and retail trade. Between 2006 and 2007, the following growth rates were observed in OR Tambo per broad economic sector (based on GVA at constant 2000 prices):

- Agriculture - 1.0%
- Mining - 7.8%
- Manufacturing - 0.7%
- Electricity - 1.4%
- Construction - 25.2%
- Trade - 6.8%
- Transport - 5.7%

- Finance - 12.9% and
- Community services - 3.2%

## 13 Potential Issues & Environmental Impacts

### 13.1 Geology & Soils

Soil may be lost due to vegetation removal, soil erosion, soil pollution as a result of spillages and loss of viability due to compaction. The topsoil is a particularly scarce resource in this environment, and must therefore be protected against wind, erosion, compaction, alien invasive plant species and pollution as the topsoil will be needed for rehabilitation purposes. The borrow pits are not normally associated with blasting activities and should therefore not have a significant impact on the structural geology of the area.

### 13.2 Topography & Drainage

The topography may be impacted upon by extensive cut and fill sections being created during mining activities. This could in turn have an effect on the storm water runoff and drainage of the immediate surrounding areas which in turn could lead to erosion and sedimentation of downstream rivers/drainage lines.

### 13.3 Consumption of Non-renewable Resources

The mining activities may impact on the local and regional natural resources as soil and hard rock will be used during construction activities. Due to the fact that the material resources will be used for upgrading/re-graveling purposes, and not for the construction of a new road, the proposed quantities mined from the borrow pits can be seen as relatively low and should therefore not deplete local or regional resources significantly.

### 13.4 Surface Water

The borrow pit is in close proximity ( $\pm 200\text{m}$ ) to a drainage line leading to a stream/river as indicated in the table below:

Borrow pit #	River./Stream name	Class	Conservation Status
ORTDM-IR03_BP01	Nxotseni	Class C: Moderately Modified	Vulnerable

Surface water in close proximity may become polluted via point source and/or diffuse discharge such as oil, fuel and chemical spills. Mining activities may also lead to soil erosion, which could lead to sedimentation of the rivers, and subsequently, the water quality. This may lead to an impact on downstream biota of the rivers/streams.

If any surface water is to be abstracted for mining purposes then the contractor must obtain a permit from the Department of Water Affairs prior to any abstraction taking place.

### 13.5 Groundwater

Groundwater may also become polluted via point source and/or diffuse discharge such as oil, fuel and chemical spills. Petroleum products (used by excavation machinery) released to the environment migrate through soil via two general pathways, namely, as bulk flow infiltrating the soil under the forces of gravity and capillary action, and, as individual compounds separating from the bulk petroleum mixture and dissolving in air or water. As the products migrate through the soil column, a small amount of the product mass is retained by soil particles.

The bulk product retained by the soil particles is known as “residual saturation”, and depending upon the persistence of the products, residual saturation can potentially reside in the soil for years. Residual saturation is important as it determines the degree of soil contamination and can act as a continuing source of contamination for individual compounds to separate from the bulk product and migrate independently.

If any groundwater is to be abstracted for mining purposes then the contractor must obtain a permit from the Department of Water Affairs prior to any abstraction taking place.

### 13.6 Vegetation Removal and Habitat Disturbance

All of the borrow pits are located within areas where there is a high level of utilization leading to degradation and transformation. The vegetation units show various stages of over-utilization, and the shifting effects of development have caused continuous disturbance of the soil surface, which has led to secondary succession changes in the grassland and invasion by alien invasive species. Poor grazing management has led to the dominance of unpalatable grasses and invasion by weedy, mostly alien, forbs.

Rehabilitation should however form an integral part of the post excavation phase in order to avoid further soil erosion, vegetation removal and alien invasive weeds.

### 13.7 Air Quality

The air quality may be impacted upon by the mining activities due to dust generation and fugitive emissions from excavation and hauling vehicles

### 13.8 Visual Impact

Borrow pit activities may lead to dust generation and vegetation removal which could have an impact visually on the rural character of the area.

### 13.9 Archaeology, Palaeontology & Heritage Sites

No archaeological or cultural heritage resources, as defined and protected under the NHRA 1999, were identified during the Archaeological Impact Assessment. It is recommended that use of borrow pit ORTDM-IR03\_BP01 proceeds as applied for without the developer having to comply with additional heritage compliance requirements.

The Paleontological Impact Assessment concluded that the areas around the borrow pits are dominated by rolling hill topography. The underlying Eccca and Beaufort Groups are interbedded mudstones and sandstones. There is a high potential to uncover fossil material in these underlying mudstones during excavations. The borrow pits in the Eccca Group have a medium palaeontological sensitivity rating. The borrow pits within the Beaufort Group, i.e. the Adelaide Subgroup and the Katberg and Burgersdorp Formations of the Tarkastad Subgroup have a high palaeontological sensitivity rating. Through adequate monitoring and mitigation measures during excavations of the Eccca and Beaufort Groups the medium to high impact severity can be lowered to beneficial. The exposure and subsequent reporting of fossils (that would otherwise have remained undiscovered) will have a beneficial palaeontological impact.

Borrow pit specific mitigation recommendation is summarised as follows:

**Table 4: Summary of Palaeontological Impact Assessment.**

Rd #	BP #	Mitigation Measures
Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	None - Igneous/metamorphic rocks or quartzitic sandstone underlie these zones, with no potential for fossils.

### 13.10 Land use

The borrow pit is existing, and has therefore been disturbed significantly, with the borrow pit having about 50% vegetation cover. As such the land use of the area will remain mostly as is, with small portions of the borrow pits being extended into grassland (grazing) areas. The areas will be fenced off temporarily to prevent access by humans and livestock. As such it is not expected to have a significant impact on the land use of the area.

### 13.11 Socio-Economic Environment

The local community could benefit through employment, income generation, skills development and small business enterprises (i.e. fencing companies). These benefits may be enhanced with focused procurement and by employing labor intensive methods during construction and rehabilitation of the borrow pits. Labor should be sourced from the target area so that those affected stand to benefit the most.

### 13.12 Health and Safety

There are certain risks posed to human health & safety via exposure to high noise and dust levels, as well as steep and/or unstable faces formed during mining activities. Community health and safety risks should be controlled through the implementation of a Health & Safety Management Plan to be implemented by the contractor. Existing unsafe excavations (with vertical faces) should be "made safe" on closure.

## 14 Environmental Impact Assessment

### 14.1 Environmental Impact Assessment Risk Assessment

Environmental impact is assessed using an in-house methodology and software (EIA-RA 05<sup>®</sup>), developed by BESC, which operates a 3-D risk assessment protocol based on severity of impact, duration of impact and confidence of impact occurring.

The first step in assessing any environmental impact to listed possible activities or processes that are likely to occur and then identify any resultant or consequential environmental issue. The potential impact associated with an environmental issue is then identified as is the spatial range that any such impact would affect or take place in. The assessment is undertaken under two primary conditions, namely:

- Degree of impact WITHOUT environmental management protocols in place
- Degree of impact WITH environmental management protocols in place

To achieve this, information on severity of impact, duration of impact and confidence of impact occurring are entered, with a risk assessment output for each environmental impact being computed. The environmental impacts are thus categorised into ten negative impact categories and a four positive impact categories.

The ten negative categories are arranged on a scale of importance from category 1 being most negative and category 10 being least negative. Whilst the positive impact categories are arranged on a similar scale whereas category A is most positive and category D being least positive. In order to place a degree of significance to each impact (positive and negative), significance of impact has been defined as:

Table 5: EIA-RA 05<sup>®</sup> - Risk Assessment Ratings.

Significance	Categories	Definition
Very High	1 & 2	<p>These impacts would be considered by society as constituting a major and usually permanent change to the (natural and/or social) environment.</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> The loss of a species would be viewed by informed society as being of VERY HIGH significance.</li> </ul>
High	3 & 4	<p>These impacts will usually result in long term effects on the social and/or natural environment. Impacts rated as HIGH will need to be considered by society as constituting an important and usually long term change to the (natural and/or social) environment. Society would probably view these impacts in a serious light.</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> The loss of a diverse vegetation type, which is fairly common elsewhere, would have a significance rating of HIGH over the long term, as the area could be rehabilitated.</li> </ul>
Moderate	5, 6 & 7	<p>These impacts will usually result in medium to long term effects on the social and/or natural environment. Impacts rated as MODERATE will need to be considered by society as constituting a fairly important and usually medium term change to the (natural and/or social) environment.</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> The loss of a sparse, open vegetation type of low diversity may be regarded as MODERATELY significant.</li> </ul>
Low	8, 9 & 10	<p>These impacts will usually result in medium to short term effects on the social and/or natural environment. Impacts rated as LOW will need to be considered by the public and/or the specialist as constituting a fairly unimportant and usually short term change to the (natural and/or social) environment. These impacts are not substantial and are likely to have little real effect.</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> The temporary change in the water table of a wetland habitat, as these systems are adapted to fluctuating water levels.</li> </ul> <p>or,</p> <p>There are no primary or secondary effects at all that are important to scientists or the public.</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> A change to the geology of a particular formation may be regarded as severe from a geological perspective, but is of NO significance in the overall context.</li> </ul>
Positive	A, B, C, D	<p>Any beneficial impact to the environment:</p> <p>A = Very Beneficial</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> Protection of an environmental asset or removal of an existing/latent negative environmental impact;</li> </ul> <p>B = Beneficial</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> Improve management of the environment;</li> </ul> <p>C = Moderately Beneficial</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> Removal of alien species from the property;</li> </ul> <p>D = Slightly Beneficial</p> <ul style="list-style-type: none"> <li>○ <b>Example:</b> Minor improvement that has no material significance to the immediate environment.</li> </ul>

## 14.2 Sensitivity

An overall sensitivity assessment will be made by including condition or state of degradation, invasion status, extent and relative importance of the vegetation types as well as the degree to which successful rehabilitation can take place. Three sensitivity scores are allocated as follows:

1. Areas scoring a low sensitivity are those areas that tend to be highly degraded and it is unlikely that they could be rehabilitated to a normal functioning state without extreme effort and expense.
2. Areas of moderate sensitivity are those areas that contain reasonably intact habitat with low or no alien infestation.
3. Areas scoring a high sensitivity on site are those having an important ecological function.

## 14.3 Impacts and Mitigation Measures

Four factors will need to be considered when assessing the significance of impacts, namely:

- A. the relationship of the impact to temporal scales
- B. the relationship of the impact to spatial scales
- C. the actual significance of the impact, and
- D. the degree of confidence placed in the assessment

A. The **temporal scale** defines the significance of the impact at various time scales, as an indication of the duration of the impact.

1. **Short term:** less than 5 years. Many construction phase impacts will be of a short duration.
2. **Medium term:** between 5-20 years, the approximate duration of a mining operation.
3. **Long term:** between 20-40 years, and from a human perspective essentially permanent.
4. **Permanent:** over 40 years, and resulting in a permanent and lasting change that will always be there.

B. The **spatial scale** defines physical extent of the impact.

1. **Site Specific:** having an impact only within the confines of the development.
2. **Localized:** having an impact within close proximity of the development.
3. **Municipal:** having an impact within the municipal area
4. **Regional:** having an impact within the regional context
5. **National:** having an impact at the National Level

- C. The **Environmental Significance** scale is an attempt to evaluate the importance of a particular impact. This evaluation needs to be undertaken in the relevant context, as an impact can either be ecological or social, or both. The evaluation of the significance of an impact relies heavily on the values of the person making the judgment. For this reason, impacts of especially a social nature need to reflect the values of the affected society. SIGNIFICANCE will need to be evaluated with and without mitigation. In many cases, mitigation will take place, as it will have been incorporated into project design. A five-point significance scale will be applied.
1. **Very High:** These impacts are considered by the specialist as constituting a major and usually permanent change to the environment, and usually result in severe or very severe effects, or beneficial or very beneficial effects
  2. **High:** These impacts will usually result in long-term effects on the natural environment. Impacts rated as high are considered by the specialist as constituting an important and usually long-term change to the environment.
  3. **Moderate:** These impacts will usually result in medium- to long-term effects on the natural environment. Impacts rated as moderate are considered by the specialist as constituting a fairly important and usually medium term change to the environment. These impacts are real but not substantial.
  4. **Low:** These impacts will usually result in medium- to short-term effects on the natural environment. Impacts rated as low are considered by the specialist as constituting a fairly unimportant and usually short-term change to the environment. These impacts are not substantial and are likely to have little real effect.
  5. **Positive:** These impacts will usually result in a positive impact on the environment. These impacts can range from slightly beneficial to very beneficial for the environment.
- D. It is also necessary to state the **degree of confidence** with which one has predicted the significance of an impact.
1. **Definite:** More than 90% sure of a particular fact. To use this one will need to have substantial supportive data.
  2. **Probable:** Over 70% sure of a particular fact, or of the likelihood of that impact occurring.
  3. **Possible:** Only over 40% sure of a particular factor of the likelihood of an impact occurring.
  4. **Unsure:** Less than 40% sure of a particular fact or the likelihood of an impact occurring.

**Table 6: Assessment of Significance of Environmental Impacts.**

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
Geology & Soils	Soil Erosion	Negative	Construction, Operational & Closure	Site Specific	3	4	2	High	Minimize the areas of disturbance or vegetation clearance. Revegetate areas that have been disturbed as soon as possible. Cut and fill slopes shall be made stable and be revegetated as soon as possible during the operational phase.	Site Specific	5	4	2	Moderate
Geology & Soils	Soil Pollution	Negative	Construction & Operational	Site Specific	5	4	2	Moderate	Under no circumstances shall hazardous substances be disposed of on site or into the surrounding environment. Accidental pollution incidents shall be reported to the Project Manager/ECO immediately and shall be cleaned up by the Contractor or a nominated clean-up organization at the expense of the contractor. Vehicles should be well maintained. Chemical toilets are to be emptied on a regular basis and disposed of at the licensed water treatment facility	Site Specific	5	4	4	Low
Geology & Soils	Soil Compaction	Negative	Construction, Operational & Closure	Site Specific	5	4	2	Moderate	Minimize the areas of disturbance or vegetation clearance. Scarify & Revegetate areas that have been compacted as soon as possible.	Site Specific	5	7	5	Low
Geology & Soils	Topsoil Loss	Negative	Construction, Operational & Closure	Local	3	4	3	Moderate	Minimize the areas of disturbance or vegetation clearance. Topsoil to be stockpiled in designated areas and is to be used during rehabilitation. Topsoil only to be stripped from required areas and done in a way to minimize wind erosion. Stockpiles must be protected from erosion and contamination	Site Specific	5	4	3	Low
Topography & Drainage	Cut & Fill/Excavations	Negative	Construction & Operational	Site Specific	5	3	4	Low	Cut and fill slopes/Excavations shall be made stable and be revegetated as soon as possible	Site Specific	7	6	4	Low
Topography & Drainage	Increased Stormwater Runoff	Negative	Construction & Operational	Site Specific	5	8	3	Low	All areas of stormwater release must be suitable stabilized	Site Specific	8	9	5	Low

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
Topography & Drainage	Increased Soil Erosion	Negative	Construction & Operational	Site Specific	3	4	2	High	Minimize the areas of disturbance or vegetation clearance. Revegetate areas that have been disturbed as soon as possible. Cut and fill slopes/Excavations shall be made stable and be revegetated as soon as possible during the construction phase.	Site Specific	5	7	4	Low
Non-renewable Resources	Consumption of Non-renewable Resource	Negative	Operational	Municipal	3	2	3	High	The proposed quantities mined should not exceed limits specified in the mining plans/permits issued by DMR	Local	5	4	2	Moderate
Non-renewable Resources	Material Resources for roads not imported from far off distances	Positive	Operational	Municipal	5	5	2	Low	No Mitigation Required	N/A				#N/A
Surface Water	Surface water contamination	Negative	Construction & Operational	Local	4	5	5	Low	Areas of spillages and/or contamination shall be cleaned up immediately and disposed of at a licensed landfill site. Release of chemicals directly into the environment is strictly prohibited. Waste is to be removed from the area on a regular basis.	Site Specific	8	5	8	Low
Surface Water	Sedimentation	Negative	Construction & Operational	Local	4	6	5	Low	Minimize the areas of disturbance or vegetation clearance. Revegetate areas that have been disturbed as soon as possible. Cut and fill slopes/excavations shall be made stable and be revegetated as soon as possible during the construction phase. A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at stormwater release areas	Site Specific	8	5	8	Low
Surface Water	Decreased water quality	Negative	Construction & Operational	Local	5	6	5	Low	A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at stormwater release areas	Site Specific	8	5	8	Low
Surface Water	Decrease in Benthic microalgae	Negative	Construction & Operational	Local	5	6	5	Low	A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at	Site Specific	8	5	8	Low

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
									stormwater release areas					
Surface Water	Decrease in Submerged macrophytes	Negative	Construction & Operational	Local	5	6	5	Low	A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at stormwater release areas	Site Specific	8	5	8	Low
Surface Water	Decrease in Macroinvertebrates	Negative	Construction & Operational	Local	5	6	5	Low	A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at stormwater release areas	Site Specific	8	5	8	Low
Surface Water	Change in fish community structure	Negative	Construction & Operational	Local	5	6	5	Low	A stormwater cut-off berm shall be provided upslope from the mining areas. Gabions shall be provided at stormwater release areas	Site Specific	8	5	8	Low
Surface Water	Surface water abstraction	Negative	Operational	Local	3	5	2	Moderate	Applications for a water use license must be made in terms of the National Water Act, (Act 36 of 1998). Conditions contained in the approval(s) must be strictly adhered to. Abstraction rates should not exceed those specified in the water use license	Local	4	5	4	Low
Groundwater	Groundwater contamination	Negative	Construction & Operational	Local	4	3	3	Moderate	Areas of spillages and/or contamination shall be cleaned up immediately and disposed of at a licensed landfill site	Site Specific	5	4	5	Low
Groundwater	Groundwater abstraction	Negative	Operational	Local	3	5	2	Moderate	Applications for a water use license must be made in terms of the National Water Act, (Act 36 of 1998). Conditions contained in the approval(s) must be strictly adhered to. Abstraction rates should not exceed those specified in the water use license	Local	4	5	4	Low
Vegetation and Habitat	Loss of indigenous vegetation	Negative	Construction & Operational	Local	3	4	3	Moderate	Minimize the areas of disturbance or vegetation clearance. Revegetate areas that have been disturbed as soon as possible.	Site Specific	6	5	5	Low
Vegetation and Habitat	Disturbance of habitat	Negative	Construction & Operational	Site Specific	5	4	3	Low	Minimize the areas of disturbance or vegetation clearance. Revegetate areas that have been disturbed as soon as possible. No hunting/trapping of any animals is strictly forbidden.	Site Specific	8	8	5	Low
Vegetation and Habitat	Alien Invasive Plant Species	Negative	Construction, Operational &	Local	3	4	3	Moderate	All alien invasive plant species should be removed according to the Conservation of Agricultural Resources	Site Specific	5	7	8	Low

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
			Closure						Act.					
Vegetation and Habitat	Removal of alien invasive species	Positive	Construction, Operational & Closure	Local	5	5	4	Low	No Mitigation Required	N/A				#N/A
Air Quality	Dust Generation	Negative	Construction & Operational	Local	6	8	3	Low	Avoid dust generating activities during periods of medium to high winds. Cover and/or maintain appropriate freeboard on trucks hauling any loose material that could produce dust when travelling. Limit the areas that need to be cleared of vegetation. Revegetate disturbed areas as soon as possible after clearing.	Site Specific	8	8	7	Low
Air Quality	Fugitive Emissions	Negative	Construction & Operational	Site Specific	8	8	3	Low	Vehicles should be properly maintained and serviced.	Site Specific	8	8	5	Low
Noise	Noise Pollution	Negative	Construction & Operational	Local	3	5	2	Moderate	All noise sources shall be controlled at the source; Vehicle silencers should be in good working order and should be maintained. No construction/operational work should be done after working hours or on Sundays and Public Holidays.	Local	4	5	3	Low
Visual	Change in Sense of Place	Negative	Construction, Operational & Closure	Local	3	2	3	High	Borrow Pits are to be rehabilitated to represent the former habitat/surrounding land use character.	Local	5	4	6	Low
Visual	Decreased Visual Quality	Negative	Construction, Operational & Closure	Local	4	2	4	Moderate	Protect and maintain the vegetated slopes as a natural screen. Ensure that any signage (i.e. at entrance gate of construction camp site) is visible but not visually intrusive. Ensure good housekeeping at the construction campsite and control litter and general site cleanliness. Ensure that adequate ablution facilities are in place, that the workforce utilizes these facilities and that they are placed where they are not visible to the public.	Local	8	5	6	Low

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
Visual	Rehabilitation of existing borrow pits	Positive	Closure	Local	4	4	2	Moderate	No Mitigation Required	N/A				#N/A
Archaeology, Palaeontology & Heritage Sites	Disturbance of sites	Negative	Construction & Operational	Local	4	3	3	Moderate	All finds of human remains shall be reported to the nearest police station. Human remains from the graves of victims of conflict, or any burial ground or part thereof which contains such graves and any other graves that are deemed to be of cultural significance may not be destroyed, damaged, altered, exhumed or removed from their original positions without a permit from the South African Heritage and Resource Agency (SAHRA) Work in areas where artefacts are found shall cease immediately and SAHRA notified. Under no circumstances shall the Contractor, employees, subcontractors or subcontractors' employees remove, destroy or interfere with archaeological artefacts.	Local	8	6	7	Low
Archaeology, Palaeontology & Heritage Sites	Loss of sites	Negative	Construction & Operational	Local	3	3	2	High	All finds of human remains shall be reported to the nearest police station. Human remains from the graves of victims of conflict, or any burial ground or part thereof which contains such graves and any other graves that are deemed to be of cultural significance may not be destroyed, damaged, altered, exhumed or removed from their original positions without a permit from the South African Heritage and Resource Agency (SAHRA) Work in areas where artefacts are found shall cease immediately and SAHRA notified. Under no circumstances shall the Contractor, employees, subcontractors or subcontractors' employees remove, destroy or interfere with archaeological artefacts.	Local	5	6	7	Low
Archaeology,	Discovery of	Positive	Construction &	Municipal	2	3	5	Moderate	No Mitigation Required	N/A				#N/A

ASSESSMENT				PRIOR TO MITIGATION					POST MITIGATION					
Environmental Issue	Environmental Impact	Positive or Negative	Phase	Spatial	Severity	Duration	Probability	Significance Assessment	Mitigation Measures	Spatial	Severity	Duration	Probability	Significance Assessment
Palaeontology & Heritage Sites	new/buried sites		Operational											
Land Use	Change in land use	Negative	Construction, Operational & Closure	Local	3	3	4	Moderate	Borrow Pits are to be rehabilitated to represent the former habitat/surrounding land use character.	Local	8	4	8	Low
Socio - Economic	Disturbance to rural character	Negative	Construction, Operational & Closure	Local	5	3	3	Low	Borrow Pits are to be rehabilitated to represent the former habitat/surrounding land use character.	Local	8	5	6	Low
Socio - Economic	Job Creation	Positive	Construction & Operational	Municipal	4	3	3	Moderate	No Mitigation Required	N/A				#N/A
Socio - Economic	Skills Development	Positive	Construction & Operational	Municipal	4	3	3	Moderate	No Mitigation Required	N/A				#N/A
Socio - Economic	Improved Road Quality	Positive	Operational	Municipal	4	3	3	Moderate	No Mitigation Required	N/A				
Socio - Economic	Safety Risk	Negative	Construction & Operational	Local	2	2	3	Very High	The mining area shall be fenced off and access to the site shall be restricted by means of a gate. All Occupational Health & Safety Standards shall be strictly adhered to. Excavations should be made safe prior to closure.	Site Specific	2	2	8	Moderate

## 15 Mitigatory Measures

These guidelines, operating procedures and rehabilitation/pollution control requirements contained in this Environmental Management Plan will be binding on the holder of the mining permit/prospecting permission/ reconnaissance permission after approval of this Environmental Management Plan by the Department of Minerals. It is essential that this portion be carefully studied, understood, implemented and adhered to at all time.

### 15.1 General Requirements

#### 15.1.1 Mining Plans

- A copy of the mining plan shall be available at the mining site for scrutiny when required.
- A final layout plan must be submitted at closure of the mine or when operations have ceased.

#### 15.1.2 Demarcating the mining area

- The mining area must be clearly demarcated by means of beacons at its corners and/or by fencing off the mining area.
- Permanent beacons as indicated on the mining plans must be firmly erected and maintained in their correct position throughout the life of the operation.
- Mining operations shall only take place within this demarcated area.

### 15.2 Infrastructural Requirements

#### 15.2.1 Topsoil Management

- Stripping of topsoil shall be undertaken in such a manner as to minimise erosion by wind or runoff.
- All available topsoil shall be stripped to a depth not exceeding 300mm from the original ground level unless otherwise specified by the Project Manager in consultation with ECO.
- Areas from which the topsoil is to be removed shall be cleared of any foreign material which may come to form part of the topsoil during removal including bricks, rubble, any waste material, litter, excess vegetation and any other material which could reduce the quality of the topsoil.
- The Contractor shall ensure that subsoil and topsoil are not mixed during stripping, excavation, reinstatement and rehabilitation. If mixed with sub-soil the usefulness of the topsoil for rehabilitation of the site shall be lost.
- Soils should be exposed for the minimum time possible once cleared.
- Topsoil shall be temporarily stockpiled, separately from subsoil and rocky materials.
- Topsoil shall be stockpiled in the Top Soil designated storage areas.

- Soil shall not be stockpiled near drainage lines, watercourses or on steep slopes.
- Stockpiles shall be protected to prevent erosion and invasion of weeds.
- Stockpiled topsoil shall not be compacted.
- Topsoil shall be used for rehabilitation of disturbed areas only.

#### 15.2.1.1 Topsoil stripping

- Prior to the stripping of topsoil, as much as possible of the aboveground grass layer shall be removed and stockpiled. This is to be placed on top of the topsoil once the topsoil has been replaced and shall be stored separately from the topsoil. The purpose of using this vegetation material is that it contains grass seed and would therefore assist with re-establishment of the indigenous grasses that naturally occur in the area. Aside from this, the grass covering of the soil would also assist in preventing erosion prior to the re-establishment of a dense vegetation covering. Should insufficient grass covering be available to cover the soil, grass cuttings must be obtained from areas of natural grassland in the immediate vicinity of the particular area, with the consent of the affected landowner, or hydro seeding must be conducted.
- Topsoil shall be stripped from all areas that are to be utilised during the mining period and where permanent structures and access is required. Topsoil shall be stripped after clearing of woody vegetation and before excavation commences.
- While topsoil is being stripped, it should be scanned for the presence of bulbous plants. Should bulbous plants be detected, they shall be removed from the topsoil and an ecologist shall be contacted to provide advice on suitable habitats and methods for replanting.
- The topsoil is regarded as the top 200mm of the soil profile, unless there is a clearer shallower boundary between the topsoil and subsoil indicated by texture, colour or structure.
- No topsoil which has been stripped shall be buried or in any other way be rendered unsuitable for further use by mixing with spoil or by compaction using machinery.
- Topsoil shall preferably be stripped when it is in a dry condition in order to prevent compaction.

#### 15.2.1.2 Soil stockpiling

- Stripped topsoil shall be stockpiled in areas, which have been approved by the Engineer.
- Topsoil stripped from different soil zones shall be stockpiled separately and clearly identified as such.
- Soil stockpiles shall not be higher than 2.5m. The slopes of soil stockpiles shall not be steeper than 1 vertical to 5 horizontal.

- No vehicles shall be allowed access onto the stockpiles after they have been placed. Topsoil stockpiles shall be clearly demarcated in order to prevent vehicle access and for later identification when required.
- Soil stockpiles shall not be allowed to become contaminated with oil, diesel, petrol, litter or any other material that may later inhibit the growth of vegetation in the soil.
- After topsoil removal has been completed, the Contractor shall apply soil conservation measures to the stockpiles to prevent erosion and invasion of weeds. This may include the use of erosion control fabric or grass seeding.

## 15.2.2 Access to the Site

### 15.2.2.1 Establishment of Access Roads

- The access road to the mining area and the camp-site/site office must be established in consultation with the landowner/tenant.
- Existing roads shall be used as far as practicable.
- Should a portion of the access road be newly constructed the following must be adhered to:
  - The route shall be selected that a minimum number of bushes or trees are felled and existing fence lines shall be followed as far as possible.
  - Water courses and steep gradients shall be avoided as far as is practicable.
  - Adequate drainage and erosion protection in the form of cut-off berms or trenches shall be provided where necessary.
- The erection of gates in fence lines and the open/closed status of gates in new and existing positions shall be clarified in consultation with the landowner/tenant and maintained throughout the operational period.
- No other routes will be used by vehicles or personnel for the purpose of gaining access to the site.

### 15.2.2.2 Maintenance of Access Roads

- The maintenance of access roads will be the responsibility of the holder of the mining permit.
- Newly constructed access roads shall be adequately maintained so as to minimize dust, soil erosion or undue surface damage (i.e. adequate storm water control).

### 15.2.2.3 Dust control on the access and haul roads

- The liberation of dust into the surrounding environment shall be effectively controlled by the use of water spraying and/or other dust-allaying agents.
- The speed of haul trucks and other vehicles must be strictly controlled to avoid dangerous conditions, excessive dust generation or excessive deterioration of the road being used.

#### 15.2.2.4 Rehabilitation of access roads

- Whenever a mining permit is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit or right, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated in order to represent the former habitat.
- Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre mining/ prospecting situation.
- Roads shall be ripped or ploughed, and if necessary, appropriately fertilized to ensure the regrowth of vegetation. Imported road construction materials which may hamper regrowth of vegetation must be removed and disposed of in an approved manner prior to rehabilitation.
- If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the soil may be analyzed and any deleterious effects on the soil arising from the mining operation be corrected and the area be re-seeded with a seed mix to the ECO/Engineer's specification.

### 15.2.3 Office/Camp Sites

#### 15.2.3.1 Establishing Office/Camp Sites

- Any offices and camp sites (where applicable) that may be required shall be established within the boundaries of the mining area.
- Such camp or office sites shall be located closer than 100 meters from a stream, river, spring, dam or pan.
- The area chosen for these purposes shall be the minimum reasonably required in order to remove as little vegetation as possible.
- Topsoil shall be handled as described in this EMP. This topsoil is to be used for rehabilitation of the area once the office/camp sites have been removed.
- Designated cooking facilities shall be provided.
- Lighting and noise disturbance or any other form of disturbance that may have an effect on the public living in the vicinity shall be kept to a minimum by avoiding work after hours.

#### 15.2.3.2 Toilet facilities, waste water and refuse disposal

- The contractor shall provide suitable ablution facilities for employees and proper hygiene measures shall be established.
- Chemical toilet facilities or other approved toilet facilities such as a septic drain shall preferably be used and sited on the camp site at least 100 meters away from any river/stream/watercourse. The use of existing facilities must take place in consultation with the landowner/tenant.

- All effluent water from the camp washing facility (if applicable) shall be disposed of in a properly constructed French drain, situated as far as possible, but not less than 200 meters, from any stream, river, pan, dam or borehole.
- Only domestic type wash water shall be allowed to enter this drain and any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site for appropriate disposal at a licensed waste disposal facility. Records of safe disposal shall be kept on site and presented to the ECO.
- Spills should be cleaned up immediately to the satisfaction of the Engineer/ECO by removing the spillage together with the polluted soil and by disposing of them at a licensed waste disposal facility.
- Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., shall be stored in a container at a collecting point and collected on a regular basis and disposed of at a licensed waste disposal facility.
- All other waste shall also be removed from site on a regular basis and disposed of at a licensed waste disposal facility.
- Specific precautions shall be taken to prevent refuse from being dumped on or in the vicinity of the camp site. This could include environmental awareness training and the provision of a suitable number of refuse bins.

#### 15.2.3.3 Rehabilitation of the office/camp site

- When the mining permit lapses, is cancelled or is abandoned or when any prospecting or mining operation comes to an end, the holder of any such right or permit may not demolish or remove any building, structure, object -
  - which may not be demolished in terms of any other law;
  - which has been identified in writing by the Minister; or
  - which is to be retained in terms of an agreement between the holder and the owner or occupier of the land, which agreement has been approved by the Minister in writing.
- Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped.
- The site shall be seeded with an indigenous grass seed mix.
- If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the soil may be analyzed and any deleterious effects on the soil arising from the mining operation be corrected and the area be re-seeded with a seed mix to the ECO/Engineer specification.

- Photographs of the camp and office sites, before, during and after the mining operations shall be taken by the ECO and/or ELO at selected fixed points and kept on record.

#### 15.2.4 Maintenance Yard & Storage Areas

##### 15.2.4.1 Establishing the vehicle maintenance yard and secured storage areas

- The vehicle maintenance yards and secured storage areas (where applicable) shall not be located closer than 100 meters from any stream, river, spring, dam or pan, and shall be within the boundaries of the mining area.
- The areas chosen for these purposes shall be the minimum reasonably required and involve the least disturbance to vegetation.
- Topsoil shall be removed from these areas and handled as described in this EMP.
- The vehicle maintenance yard and secured storage areas shall be constructed of impermeable material and bunded.
- Runoff from vehicle maintenance yards and secured storage areas shall be contained on site in a suitable receptacle and removed for appropriate disposal at a licensed waste disposal facility. The receptacle shall be emptied when 75% full. Records of safe disposal shall be kept on site and presented to the ECO.
- Store all materials defined as hazardous within a bunded and secure area (>50L).
- The floor and bund walls should be impervious to the material stored and should be capable of containing 110% of the total volume of hazardous substance stored.
- Fuel or lubricant tanks shall be secured and provided with collision protection.
- Valves shall be locked when not in use, and shall be protected from vandalism and unauthorized use.
- Valves shall be within the confines of the bunded/impervious areas.
- Small quantities of hazardous substances (50L or less) shall be stored in appropriate containers within a secure storage area.
- Base of the storage area shall be impervious and so designed as to ensure that the hazardous substances do not infiltrate into the soil.
- Used fuels, oils, hydraulic fluids, paints and solvents and grease shall be stored in drums or other suitable containers. Care shall be taken to avoid ingress of rain water into containers.
- Once the containers are full then they shall be labeled, sealed and removed from the site to a licensed waste disposal site.
- Provide collection systems (i.e. trays or impervious linings) under machinery or equipment that may dispense hazardous substances (i.e. generators and pumps).

#### **15.2.4.2 Maintenance of vehicles and equipment**

- The maintenance of vehicles and equipment used for any purpose shall take place only in the maintenance yard areas provided.
- The maintenance yard areas shall be fully contained and impervious.
- Runoff from the maintenance yard areas shall be collected and contained on site in a suitable receptacle and removed for appropriate disposal at a licensed waste disposal facility. The receptacle shall be emptied when 75% full. Records of safe disposal shall be kept on site and presented to the ECO.
- Equipment used in the mining/ process must be adequately maintained so that during operations it does not spill oil, diesel, fuel, or hydraulic fluid.
- Machinery or equipment used on the mining area must not constitute a pollution hazard..

#### **15.2.4.3 Waste disposal**

- Suitable waste disposal containers shall be made available at all times and conveniently placed for the disposal of waste.
- Collected waste shall be separated into the different categories of hazardous, general waste and construction rubble.
- Waste containers shall be provided with lids or netting to prevent waste from being disturbed by scavengers or being blown away by wind.
- Waste shall be removed from site on a regular basis.
- All used oils, grease or hydraulic fluids shall be placed therein and these receptacles will be removed from the site on a regular basis for disposal at a registered or licensed waste disposal facility. Records of safe disposal shall be kept on site and presented to the ECO.
- All spills should be cleaned up immediately to the satisfaction of the ECO/Engineer by removing the spillage together with the polluted soil and by disposing of them at a licensed waste disposal facility

#### **15.2.4.4 Rehabilitation of vehicle maintenance yard and secured storages areas.**

- On completion of mining operations, the above areas shall be cleared of any contaminated soil, which must be disposed of at a licensed waste disposal facility. Records of safe disposal shall be kept on site and presented to the ECO.
- All buildings, structures or objects on the vehicle maintenance yard and secured storage areas shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002.
- The surface shall be ripped or ploughed to a depth of at least 300mm and topsoil previously removed from these areas shall be spread evenly to its original depth over the whole area.
- The area shall then be fertilized if necessary in order to assist re-establishment of the vegetation and then be seeded with an indigenous grass seed mix.

## 15.3 Operational Procedures

### 15.3.1 Limitations on mining/prospecting

- Mining shall be limited to the areas indicated on the mining plans for each individual borrow pit.
- The contractor shall ensure that operations take place only in the demarcated areas.
- Operations shall not be conducted closer than one and a half times the height of the bank from the edge of any river channel/stream. Damage to the bank of the river/stream caused by the operations, shall be rehabilitated to a condition acceptable to the ECO/Engineer at the expense of the contractor.

### 15.3.2 Water Use License

- If any surface or groundwater abstraction is needed then applications for a water use license must be made in terms of the National Water Act, (Act 36 of 1998).
- Approval(s) must be granted by the Department of Water Affairs prior to any abstraction taking place.
- Conditions contained in the approval(s) must be strictly adhered to.
- The appropriate license forms for each kind of expected water use should be completed and submitted together with supporting documentation.

### 15.3.3 Excavations

Whenever any excavation is undertaken the following operating procedures shall be adhered to:

- Topsoil shall, in all cases be handled as described in this EMP.
- Excavations shall take place only within the approved demarcated mining area as indicated in the mining plans.
- Overburden rocks and coarse material shall be placed concurrently in the excavations or stored adjacent to the excavation, if practicable, to be used as backfill material once mining operations have ceased.
- Trenches shall be backfilled as soon as possible.
- Areas of expected increased surface runoff along the down-slope borders of the excavation areas (i.e. areas natural runoff may be concentrated) shall be suitable stabilized using gabions and/or rock material. These areas shall be maintained until the borrow pits have been fully rehabilitated.

### 15.3.4 Rehabilitation of excavation areas

The following operating procedures shall be adhered to during the rehabilitation of excavation areas:

- The excavated area must serve as a final depositing rocks and coarse material not used in the road construction.
- Waste material (general waste, litter, etc) shall not be deposited in the excavations.
- Once excavations have been refilled and profiled with acceptable contours and erosion control measures, the topsoil previously removed shall be returned to form a layer no less than 50mm. If insufficient topsoil is available, then it must be imported from elsewhere if such material is available.
- The areas shall be fertilized if necessary to allow vegetation to establish rapidly. The site shall be seeded (by hand or hydro seeded) with an indigenous grass seed mix in order to propagate the locally or regionally occurring vegetation.
- Near vertical slopes (1:1 to 1:2) must be stabilized using natural rock wall structures constructed using conventional building methods or in other forms with mortar forced between the structures. All structures must have a 'natural' look and provide facilities for plants to grow in.
- All areas where the slopes are 1:3 to 1:6 must be logged or otherwise stepped (using stabilization cylinders or similar) after the placement of topsoil in order to prevent soil erosion. Logs/ cylinders must be laid in continuous lines following the contours and spaced vertically 0.8-1.2 m apart, depending on the steepness of the slope. These logs/ cylinders must be secured by means of steel pegs and wire in rocky areas, and treated wooden pegs in other areas.
- The post-mining area must be fenced off in order to prevent access by livestock until such time that the vegetation has been allowed to establish sufficiently.
- The site must remain fenced with warning signs erected to caution the general public of the altered state of the environment in the area. Drainage structures must also be left intact.
- No dangerous faces which present a safety threat to communities should be left.

#### 15.4 Emergency Procedures & Remediation

- Emergency procedures must be developed for the following incidents:
  - Fire
  - Spillage of Hazardous Materials (fuel, chemicals, sewage etc)
- It is the Contractor's responsibility to develop the emergency action plans. These must be checked and approved by the ECO and by the Department of Minerals.

#### 15.5 Fire Risk & Burning

- The Contractor shall take all the necessary precautions to ensure that fires are not started on site.

- The Contractor shall develop a Fire Management Procedure.
- The Contractor shall ensure that the risk of fire at any location on site is kept to a minimum.
- The Contractor shall ensure that all construction staff are aware of these procedures.
- The Contractor shall supply firefighting equipment in proportion to the fire risk presented by the type of activity and materials used on site.
- This equipment shall be kept in good working order.
- A designated facility must be established to serve as a kitchen/food preparation area.
- Any welding or other sources of heating shall be done in a controlled environment and under appropriate supervision, in such a manner as to minimise the risk of veld fires and/or injury to staff.
- Occupational Health & Safety Act requirement relating to fire precautions and fire control shall be implemented.
- All waste bins shall be kept away from fuel tank installations.
- Smoking may only be practiced in designated smoking areas.
- Smoking near refueling depots or near any flammable substances shall be prohibited.
- Cigarette butt bins (wet sand filled), where provided, shall be emptied on a daily basis

#### 15.6 Accidental leaks & spillages

- An Emergency Action Plan and Procedure for the prevention and remediation of spillages of hazardous substances shall be developed by the Contractor. This must include clear roles & responsibilities.
- The Contractor shall ensure that his employees are aware of the procedure to be followed for dealing with spills and leaks, which shall include the immediate notification of the Engineer, ECO and the relevant authorities.
- The Contractor shall ensure that the necessary materials and equipment for dealing with spills and leaks is available on site at all times.
- Potentially hazardous materials shall be handled and stored on site in containers with tight lids that shall be sealed and disposed of at an appropriately permitted hazardous waste disposal site.
- The Contractor shall maintain a hazardous materials register which must document the use, storage, final destination and method of disposal of all hazardous substances.
- The contractor shall submit copies of Material Safety Data Sheets (in accordance with the requirements of the OHS Act - i.e. sixteen point MSDS format) to the OHSA agent. Copies shall also be kept on site.

- Treatment and remediation of the spill areas shall be undertaken to the reasonable satisfaction of the DMR.
- In the event of a hydrocarbon spill, the source of the spillage shall be isolated and contained (i.e. be protected from rainfall and surface runoff). The Contractor shall ensure that there is always a supply of absorbent material readily available to absorb / breakdown spilt hydrocarbon material and where possible, materials designed to encapsulate minor hydrocarbon spillage. This is particularly relevant in the fuel storage and dispensing area.
- The quantity of such materials shall be able to handle a minimum of 200liters of hydrocarbon liquid spill.
- The telephone numbers for the closest Hazardous Materials Emergency Response offices should be prominently displayed as bitumen and diesel spillage frequently occur on mining sites. A swift cleanup procedure is critical in order to prevent contamination.

### 15.7 Archaeology, Palaeontology & Heritage Sites

- All recommendations in the Archaeological and Palaeontological reports, as well as the recommendations made by SAHRA must be adhered to.
- All borrow pits in the Burgersdorp Formation, Tarkastad and Ceres Subgroup and Eccia Group of high palaeontological significance must be visited regularly by a palaeontologist to make sure no fossil material is disturbed. A report from the site visit must be submitted to SAHRA for comment and guidance. Monitoring of all excavations in these formations is not practical.
- The ECO must be trained by a professional palaeontologist in the recognition of fossil material.
- All finds of human remains shall be reported to the nearest police station.
- Human remains from the graves of victims of conflict, or any burial ground or part thereof which contains such graves and any other graves that are deemed to be of cultural significance may not be destroyed, damaged, altered, exhumed or removed from their original positions without a permit from the South African Heritage and Resource Agency (SAHRA)
- Work in areas where artifacts are found shall cease immediately and SAHRA notified.
- Under no circumstances shall the Contractor, employees, subcontractors or subcontractors' employees remove, destroy or interfere with archaeological artifacts.
- Any person who causes intentional damage to archaeological or historical sites and/or artifacts could be penalized or legally prosecuted in terms of the national Heritage Resources Act 25 of 1999.

- A fence of at least 3m outside the extremities of the site shall be erected to protect archaeological sites.
- All known and identified archaeological sites shall be left untouched.
- Should fossils be encountered during excavations, they should be inspected, and if needed, carefully collected by an accredited palaeontologist, with adherent matrix where necessary. The site should be given a provisional reference number (*e.g.* marked on masking tape) and carefully packaged. It is essential that the locality where the fossil is found be accurately marked on a 1: 50 000 map or recorded by GPS.
- The fossils should be inspected by an accredited palaeontologist at the earliest opportunity. If the material is deemed to be of scientific value then it should be deposited in an approved repository (*e.g.* Albany Museum, Grahamstown or East London Museum). Other specimens of educational value may be donated for display purposes.

### 15.8 Site Closure

- All infrastructure, equipment, plant, temporary housing and other items used during the mining period will be removed from the site in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002.
- All waste shall be removed from site. It will not be permitted to be buried or burned on the site.
- All access roads or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated in order to represent the former habitat. Access roads shall be rehabilitated as described in this EMP.
- Foreign materials, which may hamper the re-growth of the vegetation, must be removed prior to rehabilitation and disposed of at a licensed waste disposal site.
- Areas showing signs of erosion due to mining activities shall be suitably stabilized or rehabilitated.
- All ablution facilities shall be removed from site.
- All fences surrounding the construction site shall be removed.
- All signs relating to the mining activities shall be removed.
- All areas, devoid of vegetation or where solids have been compacted due to traffic, shall be scarified or ripped before rehabilitation to allow penetration of roots and water.
- Final rehabilitation shall be completed within a period specified by DMR and should take cognizance of the season.

## 16 Quantum of Financial Provision for Rehabilitation

The Quantum of Financial Provision shall be calculated using DME's Guideline Document for the Evaluation of the Quantum of Closure-Related Financial Provision Provided by a Mine (2005).

In terms of this guideline the borrow pits classify as Class C Mines (low risk) of low to moderate sensitivity.

**Table B.11: Rates (per hectare) to determine the quantum for financial provision (Class C mines)**

	Environmental sensitivity of mine area		
	Low	Medium	High
Rate per hectare to determine the quantum (rands)	20 000.00	50 000.00	80 000.00
Minimum amount	R 10 000.00		

## 17 Monitoring & Performance of the EMP

In order to ensure that this Environmental Management Plan is effectively implemented, it is important that regular external audits of the Environmental Management Plan are conducted.

The Department of Roads and Public Works must appoint an independent Environmental Control Officer (ECO) in order to oversee compliance with the EMP by undertaking monthly site inspections, quarterly audits and post construction/operation site visits. The audits shall aim at addressing environmental issues identified on site and to provide recommendations through the audit reports.

Audit Reports shall be provided to Department of Roads and Public Works, the Project Managers/Engineers, and the Department of Mineral Resources (DMR).

## 18 Environmental Awareness

The ECO shall be responsible for compiling and implementing an Environmental Awareness Training Programme for all staff members that aims at explaining the mitigation measures described in this report. Before commencing with any work, all staff members shall attend the

Environmental Awareness Training Programme. After attending the Environmental Awareness Training Programme, all contractors and sub-contractors shall sign an Environmental Training Register as proof of their training.

## **19 Environmental Objectives and Goals**

### **19.1 Mine Closure**

The overall Environmental Objective for mine closure is as follows:

**To render the mining area in a safe and environmentally acceptable condition on completion of the mining, rehabilitation and closure activities.**

Specific Environmental Goals include:

- To return the mining area, as closely as possible, to its original condition and land use through the shaping and landscaping of the surface and through the establishment of an indigenous grass cover emulating the surrounding environment.
- To minimize the residual impacts through ensuring that erosion is controlled, the slopes are stable, the vegetation cover is established satisfactory and that the area is left in a condition which does not pose a safety hazard to humans, livestock and indigenous fauna.
- To minimize the visual impacts of the mine on closure by way of landscaping and the establishment of an indigenous grass cover emulating the surrounding environment
- To obtain the necessary Mine Closure Certificates from the DMR.

### **19.2 Socio-Economic Aspects**

The specific objective related to the Socio-Economic aspects is as follows:

**To contribute significantly and meaningfully towards the economic and social development of the Amathole District Municipality.**

Specific goals include:

- To maximize the benefits to the local economy through the provision of employment opportunities and support of local service providers and suppliers wherever possible.
- To institute a training programme for all staff members in order to improve skills development in the area.
- To improve the safety aspects of the road for road users and pedestrians.

- To encourage further economic development through exploring partnerships with local individuals and groups in the establishment of further beneficiation businesses.

### 19.3 Archaeological, Palaeontological & Heritage Aspects

The specific objective related to the Archaeological, Palaeontological & Heritage Aspects is as follows:

**To identify, protect and preserve any sites of cultural, religious, palaeontological or archaeological significance.**

Specific goals include:

- To ensure that any identified sites are properly protected in accordance to the National Heritage Resources Act.
- To ensure that any further sites that may be discovered are identified timeously and protected in accordance to the National Heritage Resources Act.

## 20 Public Participation

The public participation process for the utilisation of the borrow pits identified on ORTDM-IR03 was held in conjunction with the public participation process for all the identified road sections and their relevant identified borrow pits.

### 20.1 Advertisement & Notification

- Public participation was initiated by the placement of a Legal Notice (English and Xhosa) in the only regional daily newspaper, The Daily Dispatch on November 04, 2011 (**Appendix D**). The general public were given 30 days to register as Interested & Affected Parties and to submit any issues/concerns they might have regarding this proposed project.
- Signboards, in English and Xhosa, were erected on November 04, 2011 strategically at intersections of roads to be upgraded & main roads in the area, and in some instances, also at the start and end of each road section to be upgraded/re-gravelled, or at each individual Borrow Pit, in order to notify the general public/community and passers-by of the proposed activity (**Appendix E**).
- Notices were handed out during the site assessments (October 18 - October 26, 2011) to surrounding landowners/occupiers who could not be identified through the landowner identification process.

### 20.2 Key Interested and Affected Parties

- A Letter of Notification and the Background information documents were posted via parcel mail to the legal custodian of the land, Department of Rural Development and Land Reform - District Manager Mr. Nick Matebese, in which the proposed borrow pits are located informing him of the proposed activity on November 04, 2011.
- Notice of the activity and a background information document was posted via registered mail to Mr Ncube the Municipal Manager for OR Tambo District Municipality on November 04, 2011.
- Notice of the activity and a background information document was posted via registered mail to Mr. Maso, the Municipal Manager for Nyandeni Local Municipality on November 04, 2011.
- Notice of the activity and a background information document was posted to Cllr T. Nompetseni, the ward 05 councillor of Nyandeni Local Municipality on November 04, 2011.

- Other Identified Key Interested and Affected Parties (Table 7) were posted either via registered or parcel mail notification of the proposed activity and the Background Information Document for this project on November 04, 2011.

Table 7: Identified Key Interested &amp; Affected Parties.

Key I & AP's							
Name			Tel/Fax		Mobile/Email	Postal	Comments
1	Ms Deidre Watkins	Tel:	041 396 3900	Mbl:	-	Department of Minerals Resources Private Bag X6076 Port Elizabeth 6000	Deputy Director : Mine Environment Management
		Fax:	041 396 3945	Eml:	<a href="mailto:Deidre.Watkins@dmr.gov.za">Deidre.Watkins@dmr.gov.za</a>		
2	Jimmy Calder, Phillip Wilkinson	Tel:	043 748 6246	Mbl:	082 900 0840	P O Box 2909, Beacon Bay 5205	WESSA
		Fax:		Eml:	<a href="mailto:Jimmy.jimjan@iafrica.com">Jimmy.jimjan@iafrica.com</a> , <a href="mailto:phillip@wessabk.co.za">phillip@wessabk.co.za</a>		
3	Dr Mariagrazia Galimberti	Tel:	(0)21 462 4502	Mbl:		South African Heritage Resources Agency, PO Box 4637, Cape Town 8000	APM Impact Assessor
		Fax:	(0)21 462 4509	Eml:	<a href="mailto:mgalimberti@sahra.org.za">mgalimberti@sahra.org.za</a>		
4	Ms Lizna Fourie	Tel:	437 010 291	Mbl:		Department of Water Affairs and Forestry PO BOX 7019, EL, 5200	Department of Water Affairs - Eastern Cape
		Fax:	043 722 6152	Eml:	<a href="mailto:FourieL4@dwa.gov.za">FourieL4@dwa.gov.za</a>		
5	SFISO KHOZA	Tel:	(047) 5016400	Mbl:		OR Tambo District Municipality; Private Bag X6043 Mthatha 5099	Director: Engineering
		Fax:		Eml:	-		
6	Ms P.A.X Dunywa	Tel:	047 501 6409	Mbl:	-	OR Tambo District Municipality; Private Bag X6043 Mthatha 5099	Director: Planning & Development
		Fax:		Eml:	<a href="mailto:andiswad@ortambodm.org.za">andiswad@ortambodm.org.za</a>		
7	Ms Mandisa Matiso	Tel:	047 501 6420	Mbl:	-	OR Tambo District Municipality; Private Bag X6043 Mthatha 5099	Director: Technical Services
		Fax:	047 532 2834	Eml:	<a href="mailto:mandisam@ortambodm.org.za">mandisam@ortambodm.org.za</a>		
8	Mr Ncube	Tel:	047 501 7000	Mbl:	-	OR Tambo District Municipality; Private Bag X6043 Mthatha 5099	OR Tambo: Municipal Manager
		Fax:		Eml:	-		
9	Mr Nick Matebese	Tel:	(047) 532-5959	Mbl:		40 Blake way street, MTHATHA, 5100; Private Bag X 5213, MTHATHA, 5100	Department of Rural Development & Land Reform: OR Tambo District Manager
		Fax:	(047) 532-5968	Eml:	<a href="mailto:NMatebese@ruraldevelopment.gov.za">NMatebese@ruraldevelopment.gov.za</a>		

Key I & AP's						
Name		Tel/Fax		Mobile/Email		Postal
10	Mr Q. Paliso	Tel:	[047] 531 1191	Mbl:		Old Radio Transkei Building, Cnr Victoria & York Roads, Mthatha Private Bag X5029 Mthatha, 5100
		Fax:	[047] 531 2887	Eml:	-	

### 20.3 Registered Interested and Affected Parties

No Interested and Affected Parties from the general public registered in response to the notifications, advertisements or signage at this stage.

### 20.4 Public Draft Environmental Management Plan Report

The public draft Environmental Management Plan Report was made available to key and registered (if any) I&AP's for a 30-day commenting period, this period commenced from date of mailing/ hand delivery, 16 January 2012, and ended on 16 February 2012. All hard copy correspondence issued to I & AP's during the public draft review period is retained in Appendix D.

**Table 8: Summary of comments made during the public participation.**




I & AP Name	Concerns/Issues/Comments	EAP Response
SAHRA: Dr Galimberti	<ul style="list-style-type: none"> <li>The SAHRA Archaeological, Palaeontological &amp; Meteorite Unit supports the recommendations of the specialist authors and requires that: <ul style="list-style-type: none"> <li>All borrow pits in the Burgersdorp Formation, Tarkastad and Ceres Subgroup and Eccia Group of high palaeontological significance must be visited regularly by a palaeontologist to make sure no fossil material is disturbed. A report from the site visit must be submitted to SAHRA for comment and guidance. Monitoring of all excavations in these formations is not practical.</li> <li>The ECO must be trained by a professional palaeontologist in the recognition of fossil material.</li> <li>If the recommendations made in the specialist report (Archaeological &amp; Palaeontological) and in SAHRA's review comment are adhered to then the the SAHRA Archaeological, Palaeontological &amp;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Recommendations are incorporated as part of this EMP and thus are to be adhered to.</li> </ul>

	<p>Meteorite Unit has no objections to the development.</p> <ul style="list-style-type: none"><li>• If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during development then SAHRA and a professional archaeologist must be alerted immediately.</li></ul>	
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## 21 Appendix A: Letters of Confirmation, Financial Provision & Undertaking

**Electronic Adobe PDF Version Only**


DOUBLE CLICK the PAPER CLIPS here to access the Letters

Letter of Confirmation - EC Department of Roads and Public Works	
Letter for Financial Provision - EC Department of Roads and Public Works	
Letter of Undertaking - EC Department of Roads and Public Works	

Hardcopy/Paper Version - See overleaf

## 22 Appendix B: Mining Plans

**Electronic Adobe PDF Version Only**  
DOUBLE CLICK the PAPER CLIP here to access the  
Mining Plan.

Mining Plan (ORTDM-IR03_BP01)	
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Hardcopy/Paper Version - See overleaf

## 23 Appendix C: Specialist Reports

### 23.1 Preliminary Material Identification Investigations

Electronic Adobe PDF Version Only

DOUBLE CLICK the PAPER CLIPS here to access the reports.



ORTDM-IR03 - Report	
ORTDM-IR03 - Borrow Pit Data Sheet - BP1	

Hardcopy/Paper Version - See overleaf

## 23.2 Archaeology, Heritage & Palaeontology

**Electronic Adobe PDF Version Only**

DOUBLE CLICK the PAPER CLIPS here to access the reports.

Archaeological Impact Assessment - ArchaeoMaps	
Palaeontological Impact Assessment - Metsi Metseng Geological & Environmental Services	

Hardcopy/Paper Version - See overleaf

## 24 Appendix D: Legal Notice

Daily Dispatch, Friday, November 4, 2011

Legal Notices	Legal Notices	Legal Notices																																																												
<b>NOTICE/ ISAZISO</b>																																																														
<p>Notice is hereby given in terms of the Regulations of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) of intent to carry out the following activity/Esi saziso sikhutshwa phantsi kwe-saziso somgaqo ka ne Minerals akunge ne Petroleum Resources Development Act (No. 28 of 2002) nezihlomelo zawo zokwenza oku kulandelayo:</p> <p><b>Activity/Umsebenzi ozakwenziwa:</b> The Department of Roads &amp; Public Works proposes to utilise borrow pits for road upgrade/re-gravelling projects located throughout the OR Tambo &amp; Alfred Nzo District Municipalities / Isebe lezendlela ne zemisebenzi kawonke-wonke icela ubuhlobo nentsebenziswana yokuboleka umlindi. Iqweba ukwenyusa isinga lezemisebenzi yezendlela zonke ne OR Tambo &amp; ne Alfred Nzo District Municipalities.</p> <p><b>List of Roads/Uluhlu ka indlela:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Road #</th> <th style="width: 50%;">Area</th> <th style="width: 30%;">Number of borrow pits</th> </tr> </thead> <tbody> <tr><td>DR18033</td><td>ELLIOTDALE</td><td>6</td></tr> <tr><td>DR08024</td><td>LUSIKISIKI</td><td>4</td></tr> <tr><td>DR08029</td><td>PORT ST JOHNS</td><td>6</td></tr> <tr><td>DR08120</td><td>CROSS MISSION/BIZANA</td><td>4</td></tr> <tr><td>DR08123</td><td>BIZANA</td><td>2</td></tr> <tr><td>DR08131</td><td>QUMBU</td><td>2</td></tr> <tr><td>DR08147</td><td>LUSIKISIKI</td><td>2</td></tr> <tr><td>DR08153</td><td>LUSIKISIKI</td><td>2</td></tr> <tr><td>DR08156</td><td>LUSIKISIKI</td><td>1</td></tr> <tr><td>DR08157</td><td>LUSIKISIKI</td><td>1</td></tr> <tr><td>DR08173</td><td>LIBODE</td><td>2</td></tr> <tr><td>DR08273</td><td>CLARKEBURY</td><td>5</td></tr> <tr><td>DR08275</td><td>CLARKEBURY</td><td>2</td></tr> <tr><td>DR08281</td><td>VEDGESVILLE</td><td>2</td></tr> <tr><td>Mvimvana Access Road-ORTDM-IR01</td><td>LUSIKISIKI</td><td>1</td></tr> <tr><td>Xhurana Access Road-ORTDM-IR02</td><td>LUSIKISIKI</td><td>2</td></tr> <tr><td>Jongisizwe Access Road-ORTDM-IR03</td><td>LIBODE</td><td>1</td></tr> <tr><td>ORTDM-IR04</td><td>MOUNT AYLIF</td><td>4</td></tr> <tr><td>Niyenyame Access Road - ANDM-IR01</td><td>CEDARVILLE</td><td>5</td></tr> </tbody> </table> <p><b>Proponent/Abanikazi zimemo:</b> Department of Roads &amp; Public Works (Eastern Cape) Private Bag X0023 Bhisho 5605</p> <p><b>Consultant/Umniki mcebiso:</b> BESC PO Box 8241, Nahoon, 5210, East London. Mr. Conroy van der Riet/Ms. Lee-Anne Proudfoot Tel: (043) 726 4242 Fax: (043) 726 3199 E-mail: conroy@besc.co.za/lee-anne@besc.co.za</p> <p>In order to ensure that you are identified as an interested and affected party, please submit your name, contact information, and interest in the project, to the Consultant within 30 days of this advertisement/ Ukuba unqwenela ukubandakanywa njenomnye onomdla nochapahizelekayo, nceda faka igama lakho, nenkcukacha apho unokuqhagamshiseleka khona, nento ekutsalayo nekuchaphazelayo koluphuhliso, uyigqithise kumniki- Mcebiso zingadlulanga iintsuku ezi mashumi mathathu (30 days) sibhengeziwe esi saziso.</p> <p>Date of advertisement: <b>November 04, 2011</b></p>			Road #	Area	Number of borrow pits	DR18033	ELLIOTDALE	6	DR08024	LUSIKISIKI	4	DR08029	PORT ST JOHNS	6	DR08120	CROSS MISSION/BIZANA	4	DR08123	BIZANA	2	DR08131	QUMBU	2	DR08147	LUSIKISIKI	2	DR08153	LUSIKISIKI	2	DR08156	LUSIKISIKI	1	DR08157	LUSIKISIKI	1	DR08173	LIBODE	2	DR08273	CLARKEBURY	5	DR08275	CLARKEBURY	2	DR08281	VEDGESVILLE	2	Mvimvana Access Road-ORTDM-IR01	LUSIKISIKI	1	Xhurana Access Road-ORTDM-IR02	LUSIKISIKI	2	Jongisizwe Access Road-ORTDM-IR03	LIBODE	1	ORTDM-IR04	MOUNT AYLIF	4	Niyenyame Access Road - ANDM-IR01	CEDARVILLE	5
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Figure 9: Legal Notice - Daily Dispatch.


## 25 Appendix E: Signboards



Figure 10: Images of the Signboards erected for ORTDM-IR03.

## 26 Appendix D: Public Participation - Correspondence

### 26.1 Correspondence issued to and received from Key I & AP's during the Public Participation



# BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

PO Box 8241, Nahoon, 5210, East London South Africa  
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E-mail: info@besc.co.za http://www.besc.co.za

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& Safety, Health & Environmental Management Systems

September 23, 2011

Ms. Deirdre Watkins  
Department of Mineral Resources  
Corner of Mount & Diaz Roads  
Mount Croix  
Port Elizabeth  
6001

Dear Ms Watkins,

**RE: The proposed utilisation of borrow pits for the resurfacing/regravelling/maintenance of district roads located in the Cacadu District Municipality and other inaccessible roads, Eastern Cape.**

BESC have been appointed by the Department of Roads and Public Works to prepare the Environmental Management Plans (EMP) required for the utilisation of identified borrow pits in the Cacadu District in the Eastern Cape, in addition to other inaccessible roads identified in the Chris Hani, Alfred Nzo and OR Tambo District Municipality, Eastern Cape, for the maintenance/regravelling/resurfacing of the identified roads.

Sixteen Roads in total requiring routine maintenance/resurfacing/regravelling/patch gravelling have been identified within the above mentioned areas. See Table Below and the attached excel spreadsheet table.

Located along each road is a number of borrow pits which have been identified for the sourcing of material for the routine maintenance/resurfacing/regravelling of these roads.

It is our intended approach to prepare an environmental management plan per district road identified in the below table which will cover the identified borrow pits along these sections of roads, thus sixteen EMP's will be prepared for submission and approval by DMR. As confirmed telephonically, the Department of Roads and Public Works has received exemption from the provisions of sections 16, 20, 22 and 27 of the M&PRDA, 2002, in respect of any activity to remove any mineral for the construction and maintenance of dams, harbours, roads and railway lines and as such the utilisation of the material sources is subject to the preparation, submission and approval of an Environmental Management Plan compiled in accordance with requirements of the M&PRDA. It is the Department of Roads and Public Works preference to proceed in this manner, i.e. separate application/environmental management plan for the borrow pits identified per district road, as there is a considerable distance between the identified district roads and to circumvent any possible delays which may arise during the process and which would then result in the delay of the entire project.

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23



AREA A – CACABU DISTRICT MUNICIPALITY AND INACCESSIBLE ROADS

No.	Road Number	Kilometers	LMA	Comments / Priority	Start Coordinates		End Coordinates		Total No. of Borrow pits found	No. of Existing Borrow Pits Recommended for EMP	No. of New Borrow Pits Recommended for EMP
					E	G	E	G			
1	ORTDM-IR03	15.0	Obukoni		30° 21' 51"	29° 51' 00"	31° 10' 01"	29° 51' 13"	3	1	
2	ORTDM-IR03 (R61)	30	Obukoni		29° 17' 03"	29° 28' 48"	31° 10' 01"	29° 28' 41"	3	2	
3	ORTDM-IR03 (R61/70)	5.4	Pieterburg		31° 19' 02"	29° 07' 31"	31° 30' 49"	29° 08' 57"	4	1	
4	ORTDM-IR03 (R61/80)	12.2	Pieterburg		30° 42' 28.3"	29° 17' 25.2"	30° 37' 15.8"	29° 17' 25.8"	5	0	
5	ORTDM-IR03	10.4	Luthany		32° 04' 30.8"	29° 19' 13.8"	32° 09' 52.1"	29° 14' 52.1"	2	1	
6	ORTDM-IR03	30	Luthany		32° 17' 01.8"	29° 10' 27.8"	32° 09' 52.1"	29° 10' 03.7"	2	1	
7	ORTDM-IR03	20	Emalaheni		31° 37' 28.6"	27° 23' 58.4"	31° 39' 36.1"	27° 10' 57.6"	2	0	
8	ORTDM-IR03	7	Emalaheni		32° 49' 16.8"	27° 10' 25.8"	31° 44' 03.0"	27° 10' 25.0"	3	1	
9	ORTDM-IR03	7.3	Emalaheni		31° 39' 16.3"	27° 13' 48.8"	31° 42' 36.9"	27° 13' 36.6"	4	0	
10	R344 - R61		Tobweni		32° 17' 58.2"	29° 12' 57.8"			3	1	
11	R344 - R61		Tobweni		32° 13' 48.4"	29° 14' 33.8"			3	1	
12	R344 - R61		Tobweni		32° 19' 31.1"	29° 15' 55.8"			2	1	
13	Pieterburg Local Road	59	Pieterburg		30° 23' 50.1"	29° 07' 15.5"			5	0	
14	ORTDM-IR03	28.84	Kuqa		30° 01' 54"	29° 08' 48"	30° 07' 50"	30° 36' 47"	2	2	
15	ORTDM-IR03	20.00	Kuqa / KwaZulu		34° 07' 43.9"	29° 14' 11.9"	34° 07' 43.9"	29° 14' 11.9"	2	1	
16	ORTDM-IR03		Kwa-Kama		34° 07' 43.9"	29° 14' 11.9"			1	1	
17	ORTDM-IR03		Kwa-Kama		34° 08' 18.8"	29° 17' 53.8"			1	1	
18	ORTDM-IR03		Kwa-Kama		34° 04' 11.8"	29° 10' 30.8"			1	1	
Totals									34	10	8
Total No of Borrow pits for									30		

As the SAMRAD Online System is currently experiencing problems, and we are unable to access this information, please could you assist me in determining if any of these identified borrow pits have already been previously permitted.

In addition, as there are 16 road sections identified and a total of approximately 30 borrow pits, as with the Chris Hani, Amathole & OR Tambo Regions we have previously discussed with DMR, we would like to put the following forward in terms of the public participation process:

- Legal Notice in respective newspapers.
- As the number of borrow pits are high, to place signboards at each particular borrow pit seems impractical, therefore we propose to group road sections and place signboards at main intersections/entrances of roads to be regavelled.
- Notifying the Relevant Municipal and Government Departments
- Notifying the Department of Rural Development as the custodian of the rural land
- Notifying the Municipal Ward Councilors
- Where applicable notify Relevant Landowners of Private Land

Please would you confirm if this would suffice, if not please suggest practical steps to be taken.

Your assistance in the above regard will be much appreciated. Please feel free to contact me directly for any further queries.

Yours Sincerely  
 Lee-Anne Proudfoot  
 (Pr.Sci.Nat – Environmental Scientist)  
 Senior Environmental Consultant  
 Mobile: +27 83 421 3991  
 Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

**Lee-Anne Proudfoot**

**From:** Lee-Anne Proudfoot <lee-anne@besc.co.za>  
**Sent:** 23 September 2011 12:27 PM  
**To:** 'Deidre Watkins'  
**Cc:** 'Siyanda Lurwenga'  
**Subject:** Proposed utilisation of borrow pits - Cacadu Region & Other inaccessible roads  
**Attachments:** DMR-09\_2011.pdf; Cacadu & Inaccessible Roads Table - DMR.xls

Dear Deidre,

Please find attached correspondence regarding the preparation of Environmental Management Plans for the utilisation of various identified borrow pits located in the Cacadu District and along other inaccessible roads – the applicant is the Department of Roads and Public Works. Please acknowledge receipt of the attached correspondence.

Dear Siyanda

As the SAMRAD Online System is experiencing problems and we are unable to access this information, please could you assist me again in determining if any of these identified borrow pits have already been previously permitted, please see the attached excel spread sheet. Thank you.

Should you have any queries, please do not hesitate to contact me.

Kind Regards

Lee-Anne  
Ms Lee-Anne Proudfoot  
Environmental Consultant  
Biotechnology & Environmental Specialist Consultancy cc  
PO Box 8241, Nahoon, 5210, East London, South Africa  
9 Douglas Road, Vincent, 5247, East London, South Africa  
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Office Fax: +27 43 726 3199  
Office Email: [info@besc.co.za](mailto:info@besc.co.za)  
Web: <http://www.besc.co.za>

**Lee-Anne Proudfoot**

**From:** Deidre Watkins <Deidre.Watkins@dmr.gov.za>  
**Sent:** 26 September 2011 08:19 AM  
**To:** Lee-Anne Proudfoot  
**Subject:** RE: Proposed utilisation of borrow pits - Cacadu Region & Other inaccessible roads

Good Morning Lee-Anne,

We also have problems in the office with the SAMRAD system, but I will ask Siyanda to check on the system for the coordinate data given. Thanks.

Best regards,  
Deidre

Siyanda,

If it is possible, please can you check the SAMRAD system, as per query in Lee-Anne's email. Please indicate to her whether this is possible at the moment or not. Thanks.

Best regards,  
Deidre

**Lee-Anne Proudfoot**

**From:** Siyanda Lurwenga <Siyanda.Lurwenga@dmr.gov.za>  
**Sent:** 29 September 2011 02:04 PM  
**To:** Lee-Anne Proudfoot  
**Subject:** RE: Proposed utilisation of borrow pits - Cacadu Region & Other inaccessible roads

Good day Lee-Anne

sorry I could not provide you the information as per the spread sheet template that you have attached.

I have completed checking the statuses of the identified borrow pits. Almost none of the borrow pits on the provided list could be identified on our records, except that the provided coordinates for road number DR1774 site Brakkenduine BP plots about 85 meters north of a licenced borrow pit to DRT and road number MR00397 which plots over a rejected DRT application. The identified site for road DR01763 seems not to be a borrow pit as it is owned by an individual. Thanks

Best regards,  
Siyanda

**Lee-Anne Proudfoot**

**From:** Siyanda Lurwenga <Siyanda.Lurwenga@dmr.gov.za>  
**Sent:** 30 September 2011 09:30 AM  
**To:** Lee-Anne Proudfoot  
**Subject:** RE: Proposed utilisation of borrow pits - Cacadu Region & Other inaccessible roads

Hi Lee-Anne

Sorry for providing you with incomplete information. I have entered the new coordinates for road DR01774 site Brakkenduine BP and I can confirm that the new coordinate plots on the identified authorized borrow pit issued to DRT and its details are as follow;

Permit Holder: DRT  
File Number: 175 MR  
Expiry Date: 2019/01/08

With reference to your point number two regarding the basis on which the identified borrow pit for road M00397 was rejected, all I can do is to give you a reference number of that application so that you can perhaps contact Deidre and find out from her. We usually don't put reasons for refusal on our system, in fact our system hasn't got that functionality. The application reference is 125 MR submitted by DRT.

Lastly the provided coordinates for road DR01763 site 1763\_BP02 plots directly on a permit that was issued into an individual meaning there is someone mining over the same area. The operation is not permitted to DRT hence I am saying it is not a borrow pit application, it is a normal mining permit authorization that is not exempted from any provision of the Act, but am not quite sure whether it is still valid or it lapsed because it's an old authorization.  
Thanks

Regards,  
Siyanda



## BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

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**Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems**

November 3, 2011

Ms. Deidre Watkins  
Deputy Director: Mine Environment Management  
Department of Minerals and Energy  
C/o of Mount & Diaz Roads  
Mount Croix  
Port Elizabeth  
6001  
Tel: (041) 3963934  
Fax: 086 576 8004

**RE: Background Information Documents for the utilisation of borrow pits in the OR Tambo District Municipality & Alfred Nzo District Municipality, Eastern Cape.**

As per previous correspondence, the Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo District Municipality & Alfred Nzo District Municipality. BESC have been appointed to compile the Environmental Management Plans for these borrow pits.

The permitting of the materials sources required for the project will be undertaken in accordance with the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002). As previously confirmed, since the proponent, Department of Roads and Public Works, has been exempted in terms of the provisions of the M & PRDA Environmental Management Plans will be compiled for submission and approval from the DMR for the utilisation of the identified borrow pits, per the 29 roads sections.

Accompanying this letter for your records is a CD containing the Background Information Document(s) (BID'(s)) for the road sections where all the borrow pits to be utilised have been identified, which are to be distributed during the public participation process. Please refer to the attached table for the borrow pits and road sections. As the other borrow pits on the remaining road sections become identified, these will be forwarded to the department.

Please feel free to contact BESC if you have any further queries.

Yours Sincerely  
Lee-Anne Proudfoot  
(Pr.Sci.Nat – Environmental Scientist)  
Senior Environmental Consultant  
Mobile: +27 83 421 3991

Page 1 of 3

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23



Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)  
 Mr. Conroy van der Riet  
 (Pr.Sci.Nat. - Environmental Scientist)  
 Senior Environmental Consultant  
 Mobile: 083 993 1243  
 Email: conroy@besc.co.za

Road #	Borrow pit #	Latitude	Longitude	Local Municipality	Ward	Farm #/ Allotment Name
Mvimvana Access Road-ORTDM-IR01	ORTDM-IR01_BP01	31°15'48.65"	29°33'20.67"	INGQUZA HILL	18_12	FARM 19
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP01	31°16'25.30"	29°29'13.40"	INGQUZA HILL	13	FARM 115
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP02	31°15'37.20"	29°29'7.10"	INGQUZA HILL	13	FARM 115
Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	31°21'24.30"	29°6'8.50"	NYANDENI	5	FARM RE/96
ORTDM-IR04	ORTDM-IR04_BP01	30°46'12.74"	29°31'38.73"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP02	30°46'23.30"	29°30'38.70"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP03	30°46'32.19"	29°29'41.31"	NTABANKULU	17	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP04	30°46'48.00"	29°29'34.40"	NTABANKULU	17	MBONGWENI LOC 7
DR18033	18033_BP01	31°51'50.3" S	28°36'15.6" E	KSD	19	Sitebe
DR18033	18033_BP02	31°58'39.2" S	28°39'48.2" E	MBASHE	13	Eliotdale
DR18033	18033_BP06	32°11'56.1" S	28°52'24.2" E	MBASHE	20	RE/29
DR18033	18033_BP01N	32°03'14.7" S	28°47'50.1" E	MBASHE	15	RE/63
DR18033	18033_BP02N	31°58'46.6" S	28°39'53.8" E	KSD	21	Farm 76
DR18033	18033_BP03N	32°11'43.0" S	28°52'23.9" E	MBASHE	20	RE/29
DR08024	024_BP01	31°20'30.7" S	29°44'45.2" E	INGQUZA HILL	24	3/89
DR08024	024_BP01N	31°20'21.9" S	29°45'27.9" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°19'29.9" S	29°47'12.3" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°20'01.5" S	29°45'16.4" E	INGQUZA HILL	24	3/89
DR08029	029_BP01	31°41'06.7" S	29°22'55.2" E	PORT ST JOHNS	3	Farm 43
DR08029	029_BP01N	31°43'22.0" S	29°16'19.9" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP02N	31°45'10.1" S	29°18'11.2" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP03N	31°45'18.3" S	29°18'13.8" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP04N	31°44'02.8" S	29°21'39.1" E	PORT ST JOHNS	2	Farm 43
DR08029	029_BP05N	31°42'59.6" S	29°21'54.1" E	PORT ST JOHNS	2	Farm 43
DR08120	120_BP01	31°03'16.7" S	29°45'24.6" E	MBIZANA	15	RE/54
DR08120	120_BP02	31°10'12.9" S	29°43'43.1" E	INGQUZA HILL	28	RE/85
DR08120	120_BP01N	30°54'28.1" S	29°49'33.9" E	MBIZANA	13	RE/51
DR08120	120_BP02N	30°54'10.5" S	29°49'34.7" E	MBIZANA	13	RE/51
DR08123	123_BP01	30°58'38.3" S	29°40'23.4" E	MBIZANA	11	RE/49
DR08123	123_BP01N	30°58'32.8" S	29°40'12.2" E	MBIZANA	10	RE/49

Page 2 of 3



DR08131	131_BP01	30°59'41.9" S	28°44'06.3" E	MHLONTLO	21	Tina LOC 20
DR08131	131_BP01N	30°58'24.3" S	28°45'25.6" E	MHLONTLO	19	Tina LOC 20
DR08153	153_BP02	31°17'16.9" S	29°20'13.6" E	INQGUZA HILL	2	RE/108
DR08153	153_BP01N	31°20'21.8" S	29°30'7.5" E	INQGUZA HILL	17	Farm 116
DR08156	156_BP02	31°19'24.1" S	29°23'06.4" E	INQGUZA HILL	2	RE/128
DR08156	156_BP01N	31°19'22.5" S	29°23'8.8" E	INQGUZA HILL	2	
DR08157	157_BP01	31°25'08.7" S	29°22'53.9" E	PORT ST JOHNS	17	RE/112
DR08173	173_BP01	31°24'27.2" S	28°58'51.4" E	NYANDENI	3	RE/35
DR08173	173_BP02	31°22'51.7" S	28°59'04.9" E	NYANDENI	3	RE/56
DR08273	273_BP02	31°48'20.6" S	28°17'58.6" E	ENGCOBO	16	Clarkebury
DR08273	273_BP01N	31°46'39.1" S	28°26'23.4" E	KSD	18	Mqekwezweni
DR08273	273_BP02N	31°48'07.6" S	28°24'20.8" E	KSD	18	Rune
DR08273	273_BP03N	31°48'20.0" S	28°17'38.6" E	ENGCOBO	16	Clarkebury
DR08273	273_BP04N	31°47'06.7" S	28°16'16.2" E	ENGCOBO	16	Clarkebury
DR08275	275_BP02	31°47'55.6" S	28°25'50.2" E	KSD	18	Mqekwezweni
DR08275	275_BP01N	31°53'2.2" S	28°27'14.1" E	KSD	20	Mntentu
DR08281	281_BP01	31°44'05.3" S	28°39'08.6" E	KSD	32	Xwili
DR08281	281_BP02	31°44'18.9" S	28°31'08.4" E	KSD	31	Mqekwezweni
DR08147	147_BP01	31°20'23.6" S	29°46'01.9" E	INQGUZA HILL	23	RE/89
DR08147	147_BP02	31°20'56.7" S	29°47'40.5" E	INQGUZA HILL	23	RE/89
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP01	30°25'54.90" S	29° 3'30.80" E	MATATIELE	26	RE/196
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP02	30°32'0.86" S	29° 4'3.37" E	MATATIELE	21	RE/21
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Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP04	30°33'39.60" S	29° 2'14.20" E	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP05	30°33'16.06" S	29° 1'26.59" E	MATATIELE	21	RE/21



## BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

PO Box 8241, Nahoon, 5210, East London South Africa  
9 Douglas Road, Vincent, 5247, East London, South Africa  
Telephone: +27 43 726 4242 Facsimile: +27 43 726 3199  
E-mail: [info@besc.co.za](mailto:info@besc.co.za) <http://www.besc.co.za>

**Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems**

November 3, 2011

Attention: Mr. N. Matebese  
Regional Manager – OR Tambo District  
Department of Rural Development & Land Reform  
Private Bag X 5213,  
MTHATHA,  
5100

Tel: (047) 532-5959  
Fax: (047) 532-5968

**RE: Notification of the compilation of Environmental Management Plans for the utilisation of borrow pits in the OR Tambo & Alfred Nzo District Municipalities, Eastern Cape.**

As per previous correspondence, notice is hereby given in terms of the Regulations of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) of the intent to carry out the following activity:

The Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo District Municipality and in the Alfred Nzo District Municipality. The permitting of the materials sources required for the project will be undertaken in accordance with the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002). The Department of Roads & Public Works have been exempted from provisions in terms of Section 106(1) of the M&PRDA, and thus exploration of any materials sources would be subject to the preparation, submission and approval of an Environmental Management Plan compiled in accordance with Section 39(1) of the M&PRDA and Regulation 52 of the M&PRDA regulations. BESC have been appointed to compile the Environmental Management Plans for these borrow pits.

A number of these borrow pits are located on rural/communal land or state owned land. The purpose of this letter is to notify and inform you, the custodian/landowner of all rural / communal land and the identified state owned land of the proposed utilisation of these borrow pits.

You have been identified as a Key Interested & Affected Parties (I&AP's). Accompanying this letter is a CD containing the Background Information Document(s) (BID's) pertaining to the remaining thirteen of the road sections identified along which borrow pits are located. Please refer to attached table for the borrow pits and the road sections which pertain to the BID's on the accompanying CD.

Please feel free to contact BESC if you have any further queries.

Page 1 of 4

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23




Yours Sincerely  
Lee-Anne Proudfoot  
(Pr.Sci.Nat – Environmental Scientist)  
Senior Environmental Consultant  
Mobile: +27 83 421 3991  
Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

Mr. Conroy van der Riet  
(Cand. Sci. Nat. - Environmental Scientist)  
Senior Environmental Consultant  
Mobile: 083 993 1243  
Email: [conroy@besc.co.za](mailto:conroy@besc.co.za)



Road #	Borrow pit #	Latitude	Longitude	Local Municipality	Ward	Farm #/ Allotment Name
Mvimvane Access Road-ORTDM-IR01	ORTDM-IR01_BP01	31°15'48.65"	29°33'20.67"	INGQUZA HILL	18_12	FARM 19
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP01	31°16'25.30"	29°29'13.40"	INGQUZA HILL	13	FARM 115
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP02	31°15'37.20"	29°29'7.10"	INGQUZA HILL	13	FARM 115
Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	31°21'24.30"	29° 6'8.50"	NYANDENI	5	FARM RE/35
ORTDM-IR04	ORTDM-IR04_BP01	30°46'12.74"	29°31'38.73"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP02	30°46'23.30"	29°30'38.70"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP03	30°46'32.19"	29°29'41.31"	NTABANKULU	17	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP04	30°46'48.00"	29°29'34.40"	NTABANKULU	17	MBONGWENI LOC 7
DR18033	18033_BP01	31°51'50.3" S	28°36'15.6" E	KSD	19	Sitebe
DR18033	18033_BP02	31°58'39.2" S	28°39'48.2" E	MBASHE	13	Elliotdale
DR18033	18033_BP08	32°11'56.1" S	28°52'24.2" E	MBASHE	20	RE/29
DR18033	18033_BP01N	32°03'14.7" S	28°47'50.1" E	MBASHE	15	RE/63
DR18033	18033_BP02N	31°58'46.6" S	28°39'53.8" E	KSD	21	Farm 76
DR18033	18033_BP03N	32°11'43.0" S	28°52'23.9" E	MBASHE	20	RE/29
DR08024	024_BP01	31°20'30.7" S	29°44'45.2" E	INGQUZA HILL	24	3/89
DR08024	024_BP01N	31°20'21.9" S	29°45'27.9" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°19'29.9" S	29°47'12.3" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°20'01.5" S	29°45'16.4" E	INGQUZA HILL	24	3/89
DR08029	029_BP01	31°41'06.7" S	29°22'55.2" E	PORT ST JOHNS	3	Farm 43
DR08029	029_BP01N	31°43'22.0" S	29°16'19.9" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP02N	31°45'10.1" S	29°18'11.2" E	PORT ST JOHNS	1	RE/45
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DR08029	029_BP04N	31°44'02.8" S	29°21'39.1" E	PORT ST JOHNS	2	Farm 43
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DR08120	120_BP01	31°03'16.7" S	29°45'24.6" E	MBIZANA	15	RE/54
DR08120	120_BP02	31°10'12.9" S	29°43'43.1" E	INGQUZA HILL	28	RE/85
DR08120	120_BP01N	30°54'28.1" S	29°49'33.9" E	MBIZANA	13	RE/51
DR08120	120_BP02N	30°54'10.5" S	29°49'34.7" E	MBIZANA	13	RE/51
DR08123	123_BP01	30°58'38.3" S	29°40'23.4" E	MBIZANA	11	RE/49
DR08123	123_BP01N	30°58'32.8" S	29°40'12.2" E	MBIZANA	10	RE/49
DR08131	131_BP01	30°59'41.9" S	28°44'06.3" E	MHLONTLO	21	Tina LOC 20
DR08131	131_BP01N	30°58'24.3" S	28°45'25.6" E	MHLONTLO	19	Tina LOC 20
DR08153	153_BP02	31°17'16.9" S	29°20'13.6" E	INGQUZA HILL	2	RE/108
DR08153	153_BP01N	31°20'21.8" S	29°30'7.5" E	INGQUZA HILL	17	Farm 116
DR08156	156_BP02	31°19'24.1" S	29°23'06.4" E	INGQUZA HILL	2	RE/128



DR08156	156_BP01N	31°19'22.5" S	29°23'8.8" E	INQGUZA HILL	2	
DR08157	157_BP01	31°25'08.7" S	29°22'53.9" E	PORT ST JOHNS	17	RE/112
DR08173	173_BP01	31°24'27.2" S	28°58'51.4" E	NYANDENI	3	RE/35
DR08173	173_BP02	31°22'51.7" S	28°59'04.9" E	NYANDENI	3	RE/56
DR08273	273_BP02	31°48'20.6" S	28°17'58.6" E	ENGCOBO	16	Clarkebury
DR08273	273_BP01N	31°46'39.1" S	28°26'23.4" E	KSD	18	Mqokezweni
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**Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems**

November 3, 2011

Attention: Mr Q. Paliso  
Regional Manager: DEDEA – OR Tambo Region  
Old Radio Transkei Building,  
Cnr Victoria & York Roads,  
Private Bag X5029  
Mthatha,  
5100

**RE: Notification of the compilation of Environmental Management Plans for the utilisation of borrow pits in the OR Tambo District Municipality, Eastern Cape.**

As per previous correspondence, notice is hereby given in terms of the Regulations of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) of the intent to carry out the following activity:

The Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo District Municipality. BESC have been appointed to compile the Environmental Management Plans for these borrow pits.

Please note that in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998): Listing Notices 1, 2 & 3 (GN 544, GN 545 & GN546, 2010), no listed activities will be triggered by the above mentioned utilisation of the identified borrow pits.

You have been identified as a Key Interested & Affected Parties (I&AP's). Accompanying this letter is a CD containing the Background Information Document(s) (BID's) pertaining to remaining of the road sections identified along which borrow pits are located. Please refer to attached table for the borrow pits and the road sections which pertain to the BID's on the accompanying CD.

Please feel free to contact BESC if you have any further queries.

Yours Sincerely  
Lee-Anne Proudfoot  
(Pr.Sci.Nat – Environmental Scientist)  
Senior Environmental Consultant  
Mobile: +27 83 421 3991  
Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

Page 1 of 3

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23



Mr. Conroy van der Riet  
(Pr.Sci.Nat - Environmental Scientist)  
Senior Environmental Consultant  
Mobile: 083 993 1243  
Email:conroy@besc.co.za

Road #	Borrow pit #	Latitude	Longitude	Local Municipality	Ward	Farm #/ Allotment Name
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Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	31°21'24.30"	29°6'8.50"	NYANDENI	5	FARM RE/36
ORTDM-IR04	ORTDM-IR04_BP01	30°46'12.74"	29°31'38.73"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP02	30°46'23.30"	29°30'38.70"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP03	30°46'32.19"	29°29'41.31"	NTABANKULU	17	MBONGWENI LOC 7
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DR08120	120_BP01	31°03'16.7" S	29°45'24.6" E	MBIZANA	15	RE/54
DR08120	120_BP02	31°10'12.9" S	29°43'43.1" E	INGQUZA HILL	28	RE/85
DR08120	120_BP01N	30°54'28.1" S	29°49'33.9" E	MBIZANA	13	RE/51
DR08120	120_BP02N	30°54'10.5" S	29°49'34.7" E	MBIZANA	13	RE/51
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Page 2 of 3



DR08131	131_BP01N	30°58'24.3" S	28°45'25.6" E	MHLONTLO	19	Tina LOC 20
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DR08147	147_BP02	31°20'56.7" S	29°47'40.5" E	INQGUZA HILL	23	RE/89

**Lee-Anne Proudfoot**

**From:** Lee-Anne Proudfoot <lee-anne@besc.co.za>  
**Sent:** 21 September 2011 12:36 PM  
**To:** 'MARIAGRAZIA GALIMBERTI'  
**Subject:** Proposed Utilisation of Borrow pits - Cacadu District Municipality & other inaccessible roads  
**Attachments:** Alfred Nzo D.M..jpg; Cacadu D.M..jpg; Chris Hani D.M..jpg; OR Tambo D.M..jpg  
**Importance:** High

Dear Mariagrazia,

BESC have been appointed by the Department of Roads and Public Works to prepare the Environmental Management Plans (EMP) required for the utilisation of identified borrow pits in the Cacadu District in the Eastern Cape and for a few other identified roads in Chris Hani, Alfred Nzo & OR Tambo District Municipalities, for the maintenance/regravelling/resurfacing/patch gravelling of identified roads.

Sixteen Roads requiring routine maintenance/resurfacing/regravelling/patch gravelling have been identified, five in Cacadu D.M., one in Alfred Nzo D.M., six in Chris Hani D.M. and four in OR Tambo D.M. In total some 30 borrow pits are proposed to be utilised as material sources for the routine maintenance/resurfacing/regravelling/patch gravelling of the 16 identified roads. These borrow pits are located adjacent to the identified road sections.

We have commissioned Ms Karen van Ryneveld of ArchaeoMaps to undertake the Phase 1 AIA for these borrow pits. Please could you confirm whether or not SAHRA will require that a phase 1 Palaeontological Assessment also be undertaken?

When the background information documents are available for each road section identified these will be forwarded to you; however at this stage we would just like to gain confirmation on this matter. I attach for you reference a google images of the various areas and of the borrow pits that have been identified for use.

I anticipate your response

Kind Regards

Lee-Anne

Ms Lee-Anne Proudfoot  
 Senior Environmental Consultant  
 (Pr. Sci. Nat. – Environmental Scientist)

**Lee-Anne Proudfoot**

**From:** MARIAGRAZIA GALIMBERTI <MGALIMBERTI@sahra.org.za>  
**Sent:** 22 September 2011 05:09 PM  
**To:** Lee-Anne Proudfoot  
**Subject:** Re: Proposed Utilisation of Borrow pits - Cacadu District Municipality & other inaccessible roads

Dear Lee-Anne,

could you please send to me the .kzm files for these borrow pits? If I have them, I can overlay them on our maps and see what is in our record.

With the information provided so far, you will need a PIA for Alfred Nzo, CHDM and ORTambo. More research has been done in the Cacadu DM, so we might already know whether you'll need additional work or not, but I will be able to confirm all this once I have the GPS coordinates.

Many thanks  
 Kind regards

Mariagrazia



## BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

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9 Douglas Road, Vincent, 5247, East London, South Africa  
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Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems

November 3, 2011

**Attention: SAHRA**

**RE: Notification of the compilation of Environmental Management Plans for the utilisation of borrow pits in the OR Tambo District Municipality, Eastern Cape.**

Notice is hereby given in terms of the Regulations of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) of the intent to carry out the following activity:

The Department of Roads & Public works proposes to utilize borrow pits for road upgrade/re-gravelling projects located throughout the OR Tambo District Municipality & Alfred Nzo District Municipality. BESC have been appointed to compile the Environmental Management Plans for these borrow pits.

You have been identified as a Key Interested & Affected Parties (I&AP's). Accompanying this letter is a CD containing the Background Information Document(s) (BID's) pertaining to the road sections identified, along which the borrow pits are located.

Please note that a Phase 1 Archaeological and Heritage Assessment is currently being undertaken by Ms Karen van Ryneveld (Archaeomaps) and a Palaeontological Assessment is currently being undertaken by Metsi Metseng Geological & Environmental Services for the identified borrow pits.

Please feel free to contact BESC if you have any further queries.

Yours Sincerely  
Lee-Anne Proudfoot  
(Pr.Sci.Nat – Environmental Scientist)  
Senior Environmental Consultant  
Mobile: +27 83 421 3991  
Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

Mr. Conroy van der Riet  
(Pr.Sci.Nat - Environmental Scientist)  
Senior Environmental Consultant  
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Page 1 of 3

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23



Road #	Borrow pit #	Latitude	Longitude	Local Municipality	Ward	Farm #/ Allotment Name
Mvimvana Access Road-ORTDM-IR01	ORTDM-IR01_BP01	31°15'48.65"	29°33'20.67"	INGQUZA HILL	18_12	FARM 19
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP01	31°16'25.30"	29°29'13.40"	INGQUZA HILL	13	FARM 115
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP02	31°15'37.20"	29°29'7.10"	INGQUZA HILL	13	FARM 115
Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	31°21'24.30"	29° 6'8.50"	NYANDENI	5	FARM RE/36
ORTDM-IR04	ORTDM-IR04_BP01	30°46'12.74"	29°31'38.73"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP02	30°46'23.30"	29°30'38.70"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP03	30°46'32.19"	29°29'41.31"	NTABANKULU	17	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP04	30°46'48.00"	29°29'34.40"	NTABANKULU	17	MBONGWENI LOC 7
DR18033	18033_BP01	31°51'50.3" S	28°36'15.6" E	KSD	19	Sitebe
DR18033	18033_BP02	31°58'39.2" S	28°39'48.2" E	MBASHE	13	Eliotdale
DR18033	18033_BP08	32°11'56.1" S	28°52'24.2" E	MBASHE	20	RE/29
DR18033	18033_BP01N	32°03'14.7" S	28°47'50.1" E	MBASHE	15	RE/63
DR18033	18033_BP02N	31°58'46.6" S	28°39'53.8" E	KSD	21	Farm 76
DR18033	18033_BP03N	32°11'43.0" S	28°52'23.9" E	MBASHE	20	RE/29
DR08024	024_BP01	31°20'30.7" S	29°44'45.2" E	INGQUZA HILL	24	3/89
DR08024	024_BP01N	31°20'21.9" S	29°45'27.9" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°19'29.9" S	29°47'12.3" E	INGQUZA HILL	23	3/89
DR08024	024_BP02N	31°20'01.5" S	29°45'16.4" E	INGQUZA HILL	24	3/89
DR08029	029_BP01	31°41'06.7" S	29°22'55.2" E	PORT ST JOHNS	3	Farm 43
DR08029	029_BP01N	31°43'22.0" S	29°16'19.9" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP02N	31°45'10.1" S	29°18'11.2" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP03N	31°45'18.3" S	29°18'13.8" E	PORT ST JOHNS	1	RE/45
DR08029	029_BP04N	31°44'02.8" S	29°21'39.1" E	PORT ST JOHNS	2	Farm 43
DR08029	029_BP05N	31°42'59.6" S	29°21'54.1" E	PORT ST JOHNS	2	Farm 43
DR08120	120_BP01	31°03'16.7" S	29°45'24.6" E	MBIZANA	15	RE/54
DR08120	120_BP02	31°10'12.9" S	29°43'43.1" E	INGQUZA HILL	28	RE/85
DR08120	120_BP01N	30°54'28.1" S	29°49'33.9" E	MBIZANA	13	RE/51
DR08120	120_BP02N	30°54'10.5" S	29°49'34.7" E	MBIZANA	13	RE/51
DR08123	123_BP01	30°58'38.3" S	29°40'23.4" E	MBIZANA	11	RE/49
DR08123	123_BP01N	30°58'32.8" S	29°40'12.2" E	MBIZANA	10	RE/49
DR08131	131_BP01	30°59'41.9" S	28°44'06.3" E	MHLONTLO	21	Tina LOC 20
DR08131	131_BP01N	30°58'24.3" S	28°45'25.6" E	MHLONTLO	19	Tina LOC 20
DR08153	153_BP02	31°17'16.9" S	29°20'13.6" E	INGQUZA HILL	2	RE/108
DR08153	153_BP01N	31°20'21.8" S	29°30'7.5" E	INGQUZA HILL	17	Farm 116
DR08156	156_BP02	31°19'24.1" S	29°23'06.4" E	INGQUZA HILL	2	RE/128



DR08156	156_BP01N	31°19'22.5" S	29°23'8.8" E	INQGUZA HILL	2	
DR08157	157_BP01	31°25'08.7" S	29°22'53.9" E	PORT ST JOHNS	17	RE/112
DR08173	173_BP01	31°24'27.2" S	28°58'51.4" E	NYANDENI	3	RE/35
DR08173	173_BP02	31°22'51.7" S	28°59'04.9" E	NYANDENI	3	RE/56
DR08273	273_BP02	31°48'20.6" S	28°17'58.6" E	ENGCOBO	16	Clarkebury
DR08273	273_BP01N	31°46'39.1" S	28°26'23.4" E	KSD	18	Mqokezweni
DR08273	273_BP02N	31°48'07.6" S	28°24'20.8" E	KSD	18	Rune
DR08273	273_BP03N	31°48'20.0" S	28°17'38.6" E	ENGCOBO	16	Clarkebury
DR08273	273_BP04N	31°47'06.7" S	28°16'16.2" E	ENGCOBO	16	Clarkebury
DR08275	275_BP02	31°47'55.6" S	28°25'50.2" E	KSD	18	Mqokezweni
DR08275	275_BP01N	31°53'2.2" S	28°27'14.1" E	KSD	20	Mntentu
DR08281	281_BP01	31°44'05.3" S	28°39'08.6" E	KSD	32	Xwili
DR08281	281_BP02	31°44'18.9" S	28°31'08.4" E	KSD	31	Mqokezweni
DR08147	147_BP01	31°20'23.6" S	29°46'01.9" E	INQGUZA HILL	23	RE/89
DR08147	147_BP02	31°20'56.7" S	29°47'40.5" E	INQGUZA HILL	23	RE/89
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP01	30°25'54.90"	29° 3'30.80"	MATATIELE	26	RE/196
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP02	30°32'0.86"	29° 4'3.37"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP03	30°34'28.50"	29° 3'20.80"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP04	30°33'39.60"	29° 2'14.20"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP05	30°33'16.06"	29° 1'26.59"	MATATIELE	21	RE/21

**Lee-Anne Proudfoot**

**From:** Karen van Ryneveld <kvanryneveld@gmail.com>  
**Sent:** 12 December 2011 04:24 PM  
**To:** Mariagrazia Galimberti; mlzote@ecphra.org.za; Lee-Anne Proudfoot  
**Subject:** AIA - Cacadu District and Inaccessible Roads Project  
**Attachments:** Cacadu & Inaccessible Roads.kml; AIA-Cacadu District and Inaccessible Roads Project, EC.pdf

Hi Mariagrazia, Mzikayize and Lee-Anne,

Attached please find the Phase 1 AIA for the proposed Cacadu District and Inaccessible Roads Project, Eastern Cape. Hard copies of the report will be posted to the SAHRA APM Unit and BESC.

Regards,  
 Karen

—  
 Karen van Ryneveld  
 ArchaeoMaps

Tel: 043 732 1270  
 Fax to e-mail: 086 515 6848  
 Cell: 084 871 1064  
 Postal address: Postnet Suite 239, Private Bag X3, Beacon Bay, 5205  
 E-mail: [kvanryneveld@gmail.com](mailto:kvanryneveld@gmail.com)

**Lee-Anne Proudfoot**

**From:** Lee-Anne Proudfoot <lee-anne@besc.co.za>  
**Sent:** 13 December 2011 08:43 AM  
**To:** 'MARIAGRAZIA GALIMBERTI'  
**Cc:** 'mlzote@ecphra.org.za'  
**Subject:** PIA - Cacadu District and Inaccessible Roads Project  
**Attachments:** 1112 Cacadu and other inaccessible roads- Borrow Pits PIA.pdf

Dear Mariagrazia,

Please find attached for review by SAHRA the Phase 1 PIA for the proposed utilisation of borrow pits in the Cacadu District and Other Inaccessible Roads Project, Eastern Cape. The Phase 1 AIA was submitted by Karen van Ryneveld for this project on 12 December 2011 (please see correspondence below).

Please acknowledge receipt of the Phase 1 PIA and the Phase 1 AIA. Should you have any queries, please do not hesitate to contact me.

Kind Regards

Lee-Anne

Ms Lee-Anne Proudfoot  
 Senior Environmental Consultant  
 (Pr. Sci. Nat. – Environmental Scientist)

Biotechnology & Environmental Specialist Consultancy cc  
 PO Box 8241, Nahoon, 5210, East London, South Africa  
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**Lee-Anne Proudfoot**

**From:** MARIAGRAZIA GALIMBERTI <MGALIMBERTI@sahra.org.za>  
**Sent:** 13 December 2011 09:17 AM  
**To:** Lee-Anne Proudfoot  
**Subject:** Re: PIA - Cacadu District and Inaccessible Roads Project

Dear Lee-Anne,

thank you for the PIA, I've received the AIA and I will comment on them just after Christmas. I'll try to send you a couple of projects before then, but I won't have time for this one I'm afraid.

Kind regards  
Mariagrazia

Mariagrazia Galimberti (PhD)  
APM Impact Assessor  
South African Heritage Resources Agency  
111 Harrington Street  
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South Africa  
E-mail: [mgalimberti@sahra.org.za](mailto:mgalimberti@sahra.org.za)  
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SAHRA AIA Review Comment FORM A



**SOUTH AFRICAN HERITAGE RESOURCES AGENCY**  
 111 HARRINGTON STREET, CAPE TOWN, 8001  
 PO BOX 4637, CAPE TOWN, 8000  
 TEL: 021 462 4502 FAX: 021 462 4509

FOR ATTENTION: PHRA Eastern Cape

**FOR OFFICIAL USE ONLY:**

SAHRA File No: **9/2/046/0002**  
 Date Received: **12 December 2011 (AIA and PIA)**  
 Date of Comment: **30 January 2012**  
 Sent to Peer Review: .....  
 Date to Peer Review: .....  
 SAHRA Contact Person: **Dr Mariagrazia Galimberti**  
 DMR Ref. no: .....

## REVIEW COMMENT ON ARCHAEOLOGICAL AND PALAEOONTOLOGICAL IMPACT ASSESSMENTS

BY ARCHAEOLOGY, PALAEOONTOLOGY AND METEORITES UNIT OF THE SOUTH AFRICAN HERITAGE RESOURCES AGENCY

*South Africa has a unique and non-renewable archaeological and palaeontological heritage. Archaeological and palaeontological sites are protected in terms of the National Heritage Resources Act (Act No 25 of 1999) and may not be disturbed without a permit. Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) identify and assess the significance of the sites, assess the potential impact of developments upon such sites, and make recommendations concerning mitigation and management of these sites. On the basis of satisfactory specialist reports SAHRA or the relevant heritage resources agency can assess whether or not it has objection to a development and indicate the conditions upon which such development might proceed and assess whether or not to issue permission to destroy such sites.*

*AIAs and PIAs often form part of the heritage component of an Environmental Impact Assessment or Environmental Management Plan. They may also form part of a Heritage Impact Assessment called for in terms of section 38 of the National Heritage Resources Act, Act No. 25, 1999. They may have other origins. In any event they should comply with basic minimum standards of reporting as indicated in SAHRA Regulations and Guidelines.*

*This form provides review comment from the Archaeologist of the relevant heritage resources authority for use by Heritage Managers, for example, when informing authorities that have applied to SAHRA for comment and for inclusion in documentation sent to environmental authorities. It may be used in conjunction with Form B, which provides relevant peer review comment.*

- A. PROVINCIAL HERITAGE RESOURCES AUTHORITY: **Eastern Cape**
- B. AUTHOR(S) OF REPORT: **Karen van Ryneveld**
- C. ARCHAEOLOGY CONTRACT GROUP: **Archaeomaps Archaeological Consultancy**
- D. CONTACT DETAILS: **Postnet Suite 239, Private Bag X3, Beacon Bay, 5205, kvanryneveld@gmail.com**
- E. DATE OF REPORT: **12 December 2011**
- F. TITLE OF REPORT: **Cacadu District and Inaccessible Roads Project, Eastern Cape, South Africa**
- B. AUTHOR(S) OF REPORT: **Dr Gideon Groenewald**
- C. ARCHAEOLOGY CONTRACT GROUP: **Metsi Metseng Geological and Environmental Services**
- D. CONTACT DETAILS: **Suite 91, Private Bag X62, Betlehem, 9700.**
- E. DATE OF REPORT: **5 December 2011**
- F. TITLE OF REPORT: **The Proposed Utilisation Of Borrow Pits On Roads: ANDM-IR01 - Matatiele Local Municipality in the ALFRED NZO DISTRICT MUNICIPALITY, DR07357 & DR07460 - Lukhanji Local Municipality,**

1

SAHRA AIA Review Comment FORM A

**DR08599, DR08600 & DR08602 - Emalahleni Local Municipality, R344-CHDM-IP01 - Tsohwana Local Municipality, in the CHRIS HANI DISTRICT MUNICIPALITY, ORTDM-IR03 - Nyandeni Local Municipality, ORTDM-IR01 & ORTDM-IR02 - Ingquza Hill Local Municipality, ORTDM-IR04 - Ntabankulu Local Municipality, in the O R TAMBO DISTRICT MUNICIPALITY, DR01763 & MR00397 - Kouga Local Municipality, DR01776 - Kou-Kamma Local Municipality, in the CACADU DISTRICT MUNICIPALITY.**

- G. Please circle as relevant: Archaeological and Palaeontological components of EIA / **EMP** / HIA / CMP/ Other (Specify).....
- H. REPORT COMMISSIONED BY (**CONSULTANT** OR DEVELOPER): **Biotechnology and Environmental Specialist Consultancy, Ms Lee-Anne Proudfoot**
- I. CONTACT DETAILS: **P.O. Box 8241, Nahoon, 5210, lee-anne@besc.co.za**
- J. COMMENTS: .....

*Please see comment on next page .....*

## REVIEW COMMENT ON ARCAHEOLOGICAL AND PALAEONTOLOGICAL IMPACT ASSESSMENTS

Ms K. van Ryneveld

Dated and Received: December 2012

Cacadu District and Inaccessible Roads Project, Eastern Cape, South Africa

Dr G. Groenewald

Dated and Received: December 2012

The Proposed Utilisation Of Borrow Pits On Roads: ANDM-IR01 – Matatiele Local Municipality in the Alfred Nzo District Municipality, DR07357 & DR07460 – Lukhanji Local Municipality, DR08599, DR08600 & DR08602 – Emalahleni Local Municipality, R344-CHDM-IP01 – Tsolwana Local Municipality, in the Chris Hani District Municipality, ORTDM-IR03 – Nyandeni Local Municipality, ORTDM-IR01 & ORTDM-IR02 – Ingquza Hill Local Municipality, ORTDM-IR04 – Ntabankulu Local Municipality, in the O R Tambo District Municipality, DR01763 & MR00397 – Kouga Local Municipality, DR01776 – Kou-Kamma Local Municipality, in the Cacadu District Municipality.

### INTRODUCTION

The Department of Roads and Public Works is proposing the use of 28 borrow pits (BP) to repair and upgrade 14 roads in nine local municipalities of the Eastern Cape.

Biotechnology and Environmental Specialist Consultants undertook the Environmental Management Plan for this project and commissioned both an archaeological and a palaeontological assessment of the proposed borrow pits.

One further borrow pit is expected to be used in the Cacadu District Municipal area, but authorization by Department of Mineral Resources had already been granted. However, no indication of any assessment for archaeological or palaeontological resources was recorded.

### DISCUSSION

The archaeologist visited all 28 borrow pits over a six-day period and identified several heritage resources either in proximity of the borrow pits or on the direct footprint of the borrow pits. Most of the resources identified can be described as Middle Stone Age tools and/or Iron Age settlements with related graveyards. The borrow pits which will affect archaeological resources are BP01, BP02 and BP04 along the road DR0862 and BP01 and BP02 along the road DR08599, in the Chris Hani District Municipality. The proposed borrow pits in the Cacadu, OR Tambo and Alfred Nzo District Municipalities will not affect any archaeological material of any significance.

BP01 at DR0862 comprises a Stone Age member which has already been affected by the previous use of the borrow pit. An Iron Age village, including a grave site with three graves, is located on both sides of the road, but it has not been impacted by the BP as yet. Other features of the village are huts and stock enclosure, with the widest having a diameter of 30m, a few middens and a mound possibly of spiritual significance.

BP02 along the DR0862 is also related to an Iron Age site associated to the Ndonga Ethiopian Mission Church. As in the previous case, the Iron Age site is located over a Stone Age site, however the BP in this case has already affected both sites. Five burial grounds with 16 (G1), 33 (G2), 6(G3) and 3(G4 and G5) graves respectively are also located close to the site. Some of the burials are related to the Iron Age occupation, but most of them are still currently in use.

As for BP01 and BP02 of the DR08602, also BP04 is located in proximity of both a Stone Age and an Iron Age comprising three burial grounds of 6, one and two burials respectively. At present, the site has not been impacted yet.

Along the DR08599 BP01 is proposed in proximity of an Iron Age site which comprises several features, amongst which stock enclosures, mostly rectangular, and smaller calf camps, along with circular stone outlines possibly fire pits or storage stands. No residential huts were identified. The site has not been impacted yet by the borrow pit, however proximity to it may imply that preservation of the site may be jeopardised by mining and related activities.

BP02 along the same road has possibly already impacted on a Middle Stone Age deposit.

The palaeontologist visited each borrow pit with an assistant over a five-day period after undertaking a desk top study and identified three borrow pits with certain fossil material and a few others which will cross potentially palaeontologically sensitive formations.

No palaeontological resources were identified in the Cacadu and in the OR Tambo District Municipalities, in the Chris Hani District Municipality borrow pit 02 for the DR07460 is cut into the Burgersdorp Formation and poorly defined burrow casts were identified in it, whereas in the Alfred Nzo District Municipality, two borrow pits (IR01\_BP01 and 02 for road ANDM-IR01 BP01 and BP02) cut into the Tarkastadt Subgroup had trace fossils and small bone fragments.

#### SAHRA RECOMMENDATIONS

SAHRA APM and Burial Grounds and Graves (BGG) Units support the recommendations of the authors and require that:

- The geology of borrow pit Brakkekuine in the Cacadu District Municipality must be investigated by means of a 1:250 000 geological map. Recommendations will be similar to those for borrow pits in similar formations.
- An archaeological desktop study must be undertaken on borrow pit Brakkekuine and if necessary, a site visit will be required.
- Palaeontological material identified in borrow pits BP01 and BP02 along ANDM-IR01 and BP02 along DR07460 must be mitigated. The palaeontologist will be required to apply for a permit from SAHRA APM Unit.
- All borrow pits in the Burgersdorp Formation, Tarkastadt and Ceres Subgroup and Ecca Group of high palaeontological significance, must be visited regularly by a palaeontologist, to make sure that no fossil material is disturbed. A report from the visit must be submitted to SAHRA for further comments and guidance. Monitoring of all excavations in these formations is not practical.
- The ECO must be trained by a professional palaeontologist in the recognition of fossil material.
- BP01-08602 will affect a Stone Age site. Therefore it is required that description of the site with possible site boundaries, where possible, description of the material, and of the raw source used be undertaken. Collection of a representative sample is also required under a permit application from SAHRA APM Unit.
- The Iron Age site is located in proximity of the borrow pit BP01-08602. The developer must ensure that the Iron Age site will not be affected during mining activities. The borrow pit, according to the author, is going to be demarcated and fenced off, however, to avoid unforeseen damages to the site SAHRA APM Unit requires that:
  - o The site be temporarily fenced off, at least in the section closest to the borrow pit. Signage, as suggested by the author, is supported. Moreover, since a short distance is envisaged between the site and the borrow pit, it is requested that the Iron Age site be recorded in a detailed manner. This will involve a map drawing of all features identified on the site, with their GPS coordinates, description and size. High resolution images should also be included.
  - o In addition to this recording, the grave site must be clearly demarcated and fenced off, at least temporarily, during the utilization of the borrow pit. Fencing of the site must be done in consultation with the community and it must include entry gates to allow visits from the affected relatives and friends. Permanent fencing of the graveyard is SAHRA preferred option (see Appendix 1).

SAHRA AIA Review Comment FORM A

- No activities be allowed within 20m from the Iron Age settlement and from the graveyard. Please note that 20m is the minimum distance for a buffer zone, open cast mining may easily cause unpredicted damages to heritage resources and therefore a buffer zone of 50m would be preferred.
- In agreement with the author of the report, SAHRA does not support the utilization of 08602\_BP02. The Iron and Stone Age site and one of the graveyards have already been impacted and further damage to the site and to the graveyards may occur from the use of the borrow pit. Therefore, given the extent and the significance of the site, SAHRA APM and BGG Units oppose the use of 08602\_BP02.
- 08602\_BP04 requires conservation. The site is located about 20m from the borrow pit and mining activities may likely impact on the archaeological site and graveyards. Therefore, SAHRA APM and Burial Grounds and Graves Units require that before mining activities commence:
  - The site be fenced off at least temporarily. Signage, as suggested by the author, is supported. Moreover the Iron Age site must be recorded in a detailed manner. This will involve a map drawing of all features identified on the site, with their GPS coordinates, description and size. High resolution images should also be included.
  - In addition to the recording, all grave sites should be protected and conserved. All grave sites must be fenced off during the utilization of the borrow pit. The fence must be placed 5 meters away from the perimeter of the graves. No development is allowed within 20 meters from the fence line surrounding the graves. Fencing of the graveyards must be done in consultation with the community and it must include entry gates to allow visits from the affected relatives and friends. Permanent fencing is SAHRA preferred option (see Appendix 1).
  - No activities are allowed within at least 20m from the Iron Age settlement and from the graveyards. No archaeological resources must be affected by the mining and related activities at all times. A buffer zone of 50m would be preferred.
- 08599\_BP01 is located close to the borrow pit, therefore SAHRA requires that before mining activities commence:
  - The site be fenced off at least temporarily. Signage, as suggested by the author, is supported. Moreover the Iron Age site must be recorded in a detailed manner. This will involve a map drawing of all features identified on the site, with their GPS coordinates, description and size. High resolution images should also be included. A report from the recording must be submitted to SAHRA.
  - No activities are allowed within at least 20m from the Iron Age settlement. No archaeological resources must be affected by the mining and related activities at all times. If this is not possible, it is requested that after recording the site, a permit is applied by the developer or by the archaeologist on behalf of the developer for the destruction of the site or of particular features within the site.
- 08599\_BP02 has already affected a Middle Stone Age deposit distributed in proximity of the borrow pit.
  - If disturbance of the site occurs where activities such as knapping may be identified, then recording of the site with definition of the boundaries and a photographic record must be established immediately before, during and after mitigation. Mitigation will require collection of the material. The archaeologist will require a mitigation permit from SAHRA in terms of s. 35 of the National Heritage Resources Act (Act 25 of 1999). On receipt of a satisfactory permit report from the archaeologist, SAHRA will make further recommendations in terms of the site such as its final destruction or additional sampling.
  - If mining and related activities are going to impact on the area, then surface collection of a lithic representative sample is required. The archaeologist will require a mitigation permit from SAHRA in terms of s. 35 of the National Heritage Resources Act (Act 25 of 1999).

**CONCLUSION**

If the recommendations made in the specialist report and in this comment are adhered to, the SAHRA Archaeology, Palaeontology and Meteorites Unit has no objection to the mining in terms of the archaeological and palaeontological components of the heritage resources. Recording of the Iron Age sites, as requested, must occur before mining activities commences. Reports from this recording must be submitted to SAHRA.

Reports from the site visit by the palaeontologist during earth moving activities on specific formations must be submitted to SAHRA.

If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during mining, SAHRA (Mariagrazia Galimberti/Colette Scheermeyer, Tel: 021 462 4502) and a professional archaeologist or palaeontologist according to the finding must be alerted immediately.

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT: 

EMAIL: mgalimberti@sahra.org.za .....

SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST: 

EMAIL: cscheermeyer@sahra.org.za .....

NAME OF HERITAGE RESOURCES AGENCY: SAHRA.....

PLEASE NOTE THAT THE COMMENT (ABOVE OR APPENDED) CONSTITUTES THE COMMENT OF THE HERITAGE RESOURCES AGENCY ARCHAEOLOGIST AND THAT ANY DEVELOPMENT THAT INVOLVES DESTRUCTION OF ANY ARCHAEOLOGICAL/PALAEONTOLOGICAL SITE IS STILL SUBJECT TO A PERMIT/PERMISSION FOR DESTRUCTION OF SUCH SITE GIVEN TO THE DEVELOPER BY THE RELEVANT HERITAGE RESOURCES AGENCY ARCHAEOLOGICAL AND PALAEONTOLOGICAL PERMIT COMMITTEE (THIS WILL BE SUBJECT TO APPROVAL OF THE PHASE 2 OR ARCHAEOLOGICAL/ PALAEONTOLOGICAL MITIGATION AS NECESSARY). THIS REPORT MAY BE TAKEN ONLY AS APPROVAL IN TERMS OF SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT. THE PROVINCIAL MANAGER OF THE HERITAGE RESOURCES AUTHORITY MUST ADVISE AS TO APPROVAL IN TERMS OF HERITAGE ISSUES ENCOMPASSED BY OTHER ASPECTS OF THE LEGISLATION, SUCH AS ISSUES OF THE BUILT ENVIRONMENT (STRUCTURES (E.G. FARM HOUSES), OVER 60 YEARS), INDIGENOUS KNOWLEDGE SYSTEMS OR OF CULTURAL LANDSCAPES AS THIS IS NOT WITHIN THE SCOPE OF THE ARCHAEOLOGIST.

PLEASE NOTE THAT SAHRA IS NOW RESPONSIBLE FOR GRADE I HERITAGE RESOURCES (AND EXPORT) AND THE PROVINCIAL HERITAGE RESOURCES ARE RESPONSIBLE FOR GRADE II AND GRADE III HERITAGE RESOURCES, EXCEPT WHERE THERE IS AN AGENCY ARRANGEMENT WITH THE PROVINCIAL HERITAGE RESOURCES AUTHORITY.

**APPENDIX 1****Protection of Graves**

In terms of the National Heritage Resources Act (No. 25 of 1999) graves older than 60 years (not in a municipal graveyard) are protected. Human remains younger than 60 years should be handled only by a registered undertaker or an institution declared under the Human Tissues Act.

Anyone who wishes to develop an area where there are graves older than 60 years is required to follow the process described in the legislation (section 36 and associated regulations). The specialist will require a permit from the heritage resources authority:

1. Determine/ confirm the presence of the graves on the property. Normally the quickest way to proceed is to obtain the service of a professional archaeologist accredited to undertake burial relocations. The archaeologist will provide an estimate of the age of the graves. There may be a need for archival research and possibly test excavations (permit required).
2. The preferred decision is to move the development so that the graves may remain undisturbed. If this is done, the developer must satisfy SAHRA that adequate arrangements have been made to protect the graves on site from the impact of the development. This usually involves fencing the grave(yard) and setting up a small site management plan indicating who will be responsible for maintaining the graves and how this is legally tied into the development. It is recommended that a distance of at least 5 m is left undisturbed between the grave and the fence around the graves and another 20 m between the fence of the grave and the development.
3. If the developer wishes to relocate or disturb the graves:
  - a. A 60-day public participation (social consultation) process as required by section 36 (and regulations), must be undertaken to identify any direct descendants of those buried on the property. This allows for a period of

SAHRA AIA Review Comment FORM A

consultation with any family members or community to ascertain what their wishes are for the burials. It involves notices to the public on site and through representative media. This may be done by the archaeologist, who can explain the process, but for large or sensitive sites a social consultant should be employed. Archaeologists often work with undertakers, who rebury the human remains.

- b. If as a result of the public participation, the family (where descendants are identified) or the community agree to the relocation process then the graves may be relocated.
- c. The archaeologist must submit a permit application to SAHRA for the disinterment of the burials. This must include written approval of the descendants or, if there has not been success in identifying direct descendants, written documentation of the social consultation process, which must indicate to SAHRA's satisfaction, the efforts that have been made to locate them. It must also include details of the exhumation process and the place to which the burials are to be relocated. (There are regulations regarding creating new cemeteries and so this usually means that relocation must be to an established communal rural or formal municipal cemetery.)
- d. Permission must be obtained before exhumation takes place from the landowner where the graves are located, and from the owners/managers of the graveyard to which the remains will be relocated.
- e. Other relevant legislation must be complied with, including the Human Tissues Act (National Department of Health) and any ordinances of the Provincial Department of Health). The archaeologist can usually advise about this.



## BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

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**Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems**

November 3, 2011

**Attention: Key Interested and Affected Parties**

**RE: Notification of the compilation of Environmental Management Plans for the utilisation of borrow pits in the OR Tambo District Municipality, Eastern Cape.**

Notice is hereby given in terms of the Regulations of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) of the intent to carry out the following activity:

The Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo District Municipality and Alfred Nzo District Municipality. BESC have been appointed to compile the Environmental Management Plans for these borrow pits.

You have been identified as a Key Interested & Affected Parties (I&AP's). Accompanying this letter is a CD containing the Background Information Document(s) (BID's) pertaining to the the road sections identified along which the borrow pits are located. Please refer to attached table for the borrow pits and the thirteen road sections which pertain to the BID's on the accompanying CD.

Please feel free to contact BESC if you have any further queries.

Yours Sincerely  
Lee-Anne Proudfoot  
(Pr.Sci.Nat – Environmental Scientist)  
Senior Environmental Consultant  
Mobile: +27 83 421 3991  
Email: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

Mr. Conroy van der Riet  
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Malcolm Logie

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CK 95.10210/23

Road #	Borrow pit #	Latitude	Longitude	Local Municipality	Ward	Farm #/ Allotment Name
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Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP01	31°16'25.30"	29°29'13.40"	INGQUZA HILL	13	FARM 115
Xhurana Access Road-ORTDM-IR02	ORTDM-IR02_BP02	31°15'37.20"	29°29'7.10"	INGQUZA HILL	13	FARM 115
Jongisizwe Access Road-ORTDM-IR03	ORTDM-IR03_BP01	31°21'24.30"	29°6'8.50"	NYANDENI	5	FARM RE/36
ORTDM-IR04	ORTDM-IR04_BP01	30°46'12.74"	29°31'38.73"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP02	30°46'23.30"	29°30'38.70"	NTABANKULU	18	MBONGWENI LOC 7
ORTDM-IR04	ORTDM-IR04_BP03	30°46'32.19"	29°29'41.31"	NTABANKULU	17	MBONGWENI LOC 7
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DR08029	029_BP01	31°41'06.7" S	29°22'55.2" E	PORT ST JOHNS	3	Farm 43
DR08029	029_BP01N	31°43'22.0" S	29°16'19.9" E	PORT ST JOHNS	1	RE/45
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DR08153	153_BP02	31°17'16.9" S	29°20'13.6" E	INGQUZA HILL	2	RE/108
DR08153	153_BP01N	31°20'21.8" S	29°30'7.5" E	INGQUZA HILL	17	Farm 116
DR08156	156_BP02	31°19'24.1" S	29°23'06.4" E	INGQUZA HILL	2	RE/128
DR08156	156_BP01N	31°19'22.5" S	29°23'8.8" E	INGQUZA HILL	2	



DR08157	157_BP01	31°25'08.7" S	29°22'53.9" E	PORT ST JOHNS	17	RE/112
DR08173	173_BP01	31°24'27.2" S	28°58'51.4" E	NYANDENI	3	RE/35
DR08173	173_BP02	31°22'51.7" S	28°59'04.9" E	NYANDENI	3	RE/56
DR08273	273_BP02	31°48'20.6" S	28°17'58.6" E	ENGCOBO	16	Clarkebury
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Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP01	30°25'54.90"	29° 3'30.80"	MATATIELE	26	RE/196
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP02	30°32'0.86"	29° 4'3.37"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP03	30°34'28.50"	29° 3'20.80"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP04	30°33'39.60"	29° 2'14.20"	MATATIELE	21	RE/21
Niyenyame Access Road - ANDM-IR01	ANDM-IR01_BP05	30°33'16.06"	29° 1'26.59"	MATATIELE	21	RE/21



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## 26.2 Correspondence issued to and received from Key & Registered Interested Affected Parties during the Public Draft Review Commenting Period.



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Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems

January 16, 2012

**Attention: Key Interested & Affected Parties**

**Public Draft Environmental Management Plan Reports – Utilization of Borrow Pits, OR Tambo and Alfred Nzo District Municipalities.**

In terms of the Minerals and Petroleum Resources Development Regulations (Government Notice No. 527) under the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002) and the Promotion of Administrative Justice Act (Act 3 of 2000 and as amended) the following is presented to you:

The Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo and Alfred Nzo District Municipalities. BESC have been commissioned to prepare Environmental Management Plan Reports in terms of the Minerals and Petroleum Resources Development Regulations (Government Notice No. 527) under the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002) for the proposed utilization of Borrow Pits throughout the OR Tambo & Alfred Nzo District Municipalities.

Accompanying this letter is a Compact Disc containing the Public Draft Environmental Management Plan Report(s) pertaining to the proposed borrow pits and roads sections identified in the OR Tambo and Alfred Nzo District Municipalities.

These public draft Environmental Management Plan Reports are released for review and comment for a 30-day period from date of mailing. Whereas you may want to provide comments and/or suggestions for inclusion into this assessment/ the final EMP reports, please ensure that such is received in writing by the offices of BESC before 17H00, February 16, 2011; either via email ([conroy@besc.co.za](mailto:conroy@besc.co.za)/ [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)), facsimile (043 726 3199), or post (BESC, P.O. Box 8241, Nahoon, 5210).

Yours sincerely,  
Mr. Conroy van der Riet/Ms. Lee-Anne Proudfoot  
Tel: (043) 726 4242  
Fax: (043) 726 3199  
E-mail: [lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

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#### Public Draft Environmental Management Plan Reports – Utilization of Borrow Pits, OR Tambo District Municipality.

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The Department of Roads & Public works proposes to utilize borrow pits for road maintenance/re-gravelling projects located throughout the OR Tambo Municipality. BESC have been commissioned to prepare Environmental Management Plan Reports in terms of the Minerals and Petroleum Resources Development Regulations (Government Notice No. 527) under the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002) for the proposed utilization of Borrow Pits throughout the OR Tambo District Municipality.

Accompanying this letter is a Compact Disc containing the Public Draft Environmental Management Plan Report(s) pertaining to the proposed borrow pits and roads sections identified in the OR Tambo District Municipality.

These public draft Environmental Management Plan Reports are released for review and comment for a 30-day period from date of mailing. Whereas you may want to provide comments and/or suggestions for inclusion into this assessment/ the final EMP reports, please ensure that such is received in writing by the offices of BESC before 17H00, February 16, 2012; either via email ([lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)), facsimile (043 726 3199), or post (BESC, P.O. Box 8241, Nahoon, 5210).

Yours sincerely,  
Mr. Conroy van der Riet/Ms. Lee-Anne Proudfoot  
Tel: (043) 726 4242  
Fax: (043) 726 3199  
E-mail: [conroy@besc.co.za](mailto:conroy@besc.co.za)/[lee-anne@besc.co.za](mailto:lee-anne@besc.co.za)

Page 1 of 1

Malcolm Logie

B.Sc. Hons. (Botany), M.Sc. (Botany), Ph.D. (Biotechnology), (Rhodes)  
CEAP-SA; MSAIE & ES; MIAIA; Pr.Sci.Nat.(Environ.Sci.)  
CK 95.10210/23



## BIOTECHNOLOGY & ENVIRONMENTAL SPECIALIST CONSULTANCY CC

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9 Douglas Road, Vincent, 5247, East London, South Africa  
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Leaders in Industrial Ecology, Environmental Impact & Site Assessments  
& Safety, Health & Environmental Management Systems

January 16, 2012

### Attention: Key Interested & Affected Parties

### Public Draft Environmental Management Plan Reports – Utilization of Borrow Pits, OR Tambo & Alfred Nzo District Municipalities.

In terms of the Minerals and Petroleum Resources Development Regulations (Government Notice No. 527) under the Minerals and Petroleum Resources Development Act (M&PRDA) (No. 28 of 2002) and the Promotion of Administrative Justice Act (Act 3 of 2000 and as amended) the following is presented to you:

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CK 95.10210/23

NAME	POSTAL ADDRESS	TRACE & TRACK
Jimmy Calkler, Phillip Wilkinson - WESSA	WESSA, P O Box 2909, Beacon Bay 5205	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 866 Z/A CUSTOMER COPY 301010
SFISO KHOZA - OR Tambo D.M. - Director:Engineering	OR Tambo District Municipality; Private Bag X9043 Mthatha 5099	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 870 Z/A CUSTOMER COPY 301010
Ms P.A.X Danywa - OR Tambo D.M-Director: Planning & Development	OR Tambo District Municipality; Private Bag X9043 Mthatha 5099	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 849 Z/A CUSTOMER COPY 301010
Ms Mandisa Matleo- OR Tambo D.M-Director: Technical Services	OR Tambo District Municipality; Private Bag X9043 Mthatha 5099	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 821 Z/A CUSTOMER COPY 301010
Mr Ncube- OR Tambo D.M- Municipal Manager	OR Tambo District Municipality; Private Bag X9043 Mthatha 5099	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 853 Z/A CUSTOMER COPY 301010
Mr Nick Matebese - Department of Rural Development & Land Reform: OR Tambo District Manager	Department of Rural Development & Land Reform - Private Bag X 5213, MTHATHA, 5100	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 835 Z/A CUSTOMER COPY 301010
Mr Q. Paliso - DEDEA - OR Tambo Region - Regional Manager	DEDEA - OR Tambo Region Private Bag X5029 Mthatha, 5100	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 884 Z/A CUSTOMER COPY 301010
Gwen Sgwabe- Department of Forestry - Regional Officer	Department of Forestry- Private Bag X7485, King Williams Town, 5900	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 747 Z/A CUSTOMER COPY 301010
Mr Thobela- Mbizana Local Municipality Municipal Manager	Mbizana Local Municipality, PO Box 12, BIZANA, 4800	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 733 Z/A CUSTOMER COPY 301010
Mr Tyala - KSD Municipality Acting Municipal Manager	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 733 Z/A CUSTOMER COPY 301010
Mr Tantsi- Municipal Manager - Ntabankulu Local Municipality	Ntabankulu Local Municipality, PO Box 234, NTABANKULU, 5130	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 766 Z/A CUSTOMER COPY 301010
Mr T. Masse- Mhlonto LM Acting Municipal Manager	Mhlonto Local Municipality, PO Box 31, QUMBU, 5180	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 762 Z/A CUSTOMER COPY 301010
Mr Maso- Municipal Manager - Nyendeni Local Municipality	Nyendeni Local Municipality, Private Bag X504, LIBODE, 5160	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 680 Z/A CUSTOMER COPY 301010
Mr Zola Hewu- Municipal Manager - Port St Johns Local Municipality	Port St Johns Local Municipality, PO Box 2, PORT ST JOHNS, 5120	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 699 Z/A CUSTOMER COPY 301010
Mr Muleki Fihlani- Municipal Manager - Qaukeni/Inguzha Hill Local Municipality	Qaukeni/Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 662 Z/A CUSTOMER COPY 301010

Mr Mahlasela- Engcobo Local Municipality Acting Municipal Manager	Engcobo Local Municipality, PO Box 24, ENGCOBO, 5050	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 676 Z/A CUSTOMER COPY 301010
Advocate Siphiwo Soshana- Mbashe Local Municipality- Municipal Manager	Mbashe Local Municipality, PO Box 25, INDUTYWA, 5000	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 645 Z/A CUSTOMER COPY 301010
Cllr Mamfengu - Ntabankulu Local Municipality - Ward 17 Councillor	Ntabankulu Local Municipality, PO Box 234, NTABANKULU, 5130	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 659 Z/A CUSTOMER COPY 301010
Cllr Mazaza - Ntabankulu Local Municipality - Ward 18 Councillor	Ntabankulu Local Municipality, PO Box 234, NTABANKULU, 5130	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 628 Z/A CUSTOMER COPY 301010
Cllr F. Diko - Port St Johns Local Municipality- Ward 1 Councillor	Port St Johns Local Municipality, PO Box 2, PORT ST JOHNS, 5120	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 631 Z/A CUSTOMER COPY 301010
Cllr L. Rolobole- Port St Johns Local Municipality- Ward 2 Councillor	Port St Johns Local Municipality, PO Box 2, PORT ST JOHNS, 5120	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 614 Z/A CUSTOMER COPY 301010
Cllr Zolile Magina- Port St Johns Local Municipality- Ward 3 Councillor	Port St Johns Local Municipality, PO Box 2, PORT ST JOHNS, 5120	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 685 Z/A CUSTOMER COPY 301010
Cllr Mncwathi- Port St Johns Local Municipality- Ward 17 Councillor	Port St Johns Local Municipality, PO Box 2, PORT ST JOHNS, 5120	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 691 Z/A CUSTOMER COPY 301010
Cllr N. Nkayitshona - Inguzha Hill Local Municipality- Ward 12 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 588 Z/A CUSTOMER COPY 301010
Cllr P. Ntshobo - Inguzha Hill Local Municipality- Ward 13 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 565 Z/A CUSTOMER COPY 301010
Cllr N. Zathi- Inguzha Hill Local Municipality- Ward 18 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 574 Z/A CUSTOMER COPY 301010
Cllr V. Somani- Inguzha Hill Local Municipality- Ward 2 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 587 Z/A CUSTOMER COPY 301010
Cllr M. Tanyane- Inguzha Hill Local Municipality- Ward 17 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 543 Z/A CUSTOMER COPY 301010
Cllr Dalwe- Inguzha Hill Local Municipality- Ward 23 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 150 Z/A CUSTOMER COPY 301010
Cllr M. Ntundu- Inguzha Hill Local Municipality- Ward 24 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 163 Z/A CUSTOMER COPY 301010
Cllr S. Magaye- Inguzha Hill Local Municipality- Ward 28 Councillor	Inguzha Hill Local Municipality, PO Box 14, FLAGSTAFF, 4810	ORDINARY PARCEL ShenClaf 5889 777 882 www.besc.co.za PF: 526 443 923 Z/A CUSTOMER COPY 301010

Cllr Willie - Mbashe Local Municipality - Ward 13 Councillor	Mbashe Local Municipality, PO Box 25, INDUTYWA, 5000	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 937 ZA CUSTOMER COPY 301016
Cllr Mbashe - Mbashe Local Municipality - Ward 15 Councillor	Mbashe Local Municipality, PO Box 25, INDUTYWA, 5000	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 940 ZA CUSTOMER COPY 301016
Cllr Savu - Mbashe Local Municipality - Ward 20 Councillor	Mbashe Local Municipality, PO Box 25, INDUTYWA, 5000	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 918 ZA CUSTOMER COPY 301016
Cllr N.C. Gqetywa - Nyandeni Local Municipality - Ward 3 Councillor	Nyandeni Local Municipality, Private Bag X504, LIBODE, 5160	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 883 ZA CUSTOMER COPY 301016
Cllr T. Nompesheni - Nyandeni Local Municipality - Ward 5 Councillor	Nyandeni Local Municipality, Private Bag X504, LIBODE, 5160	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 897 ZA CUSTOMER COPY 301016
Cllr. M. Makholeosa - Mbitzane Local Municipality - Ward 10 Councillor	Mbitzane Local Municipality, PO Box 12, BIZANA, 4800	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 818 ZA CUSTOMER COPY 301016
Cllr S. Faku - Mbitzane Local Municipality - Ward 11 Councillor	Mbitzane Local Municipality, PO Box 12, BIZANA, 4800	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 781 ZA CUSTOMER COPY 301016
Cllr. N. Madikizela - Mbitzane Local Municipality - Ward 13 Councillor	Mbitzane Local Municipality, PO Box 12, BIZANA, 4800	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 798 ZA CUSTOMER COPY 301016
Cllr Mambela - Mbitzane Local Municipality - Ward 15 Councillor	Mbitzane Local Municipality, PO Box 12, BIZANA, 4800	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 778 ZA CUSTOMER COPY 301016
Cllr J.M. Jikigela - Mhlonto Local Municipality - Ward 19 Councillor	Mhlonto Local Municipality, PO Box 31, QUMBU, 5180	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 764 ZA CUSTOMER COPY 301016
Cllr Mkhoseli Masehe - Mhlonto Local Municipality - Ward 21 Councillor	Mhlonto Local Municipality, PO Box 31, QUMBU, 5180	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 765 ZA CUSTOMER COPY 301016
Cllr N. Lumkwana - Engcobo Local Municipality - Ward 16 Councillor	Engcobo Local Municipality, PO Box 24, ENGCOBO, 5050	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 444 019 ZA CUSTOMER COPY 301016
Cllr M. Jasta - King Sabata Dalinyebo Local Municipality - Ward 18 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 444 945 ZA CUSTOMER COPY 301016
Cllr B. Mazini - King Sabata Dalinyebo Local Municipality - Ward 19 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 999 ZA CUSTOMER COPY 301016
Cllr Zela - King Sabata Dalinyebo Local Municipality - Ward 20 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 986 ZA CUSTOMER COPY 301016
Cllr M. Mazukwana - King Sabata Dalinyebo Local Municipality - Ward 21 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 971 ZA CUSTOMER COPY 301016

Cllr Zimela - King Sabata Dalinyebo Local Municipality - Ward 31 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 968 ZA CUSTOMER COPY 301016
Cllr M.T. Mlirera - King Sabata Dalinyebo Local Municipality - Ward 32 Councillor	King Sabata Dalinyebo Local Municipality, PO Box 45, MTHATHA, 5099	ORDINARY PARCEL Shoofat 500 111 501 200 200 200 200 PE: 526 443 954 ZA CUSTOMER COPY 301016

 <p>Biotechnology &amp; Environmental Specialist Consultancy cc PO Box 8241, Nahoon, 5210, East London South Africa 8 Douglas Road, Vincent, 5247, East London, South Africa Telephone: 043 726 4242 Facsimile: 043 726 3199 E-mail: info@besc.co.za http://www.besc.co.za</p>	
<b>DOCUMENT/REPORT RECEIPT FORM</b>	
<b>TITLE OR DESCRIPTION OF DOCUMENT/REPORT</b> Public draft EMPs: Utilisation of Borrow pits: OR TAMBO D.M & Alfred Nzo D.M.	
REPORT NUMBER	2011-R609 to 2011-R627
DATE OF REPORT	January 12, 2011
<b>PARTICULARS OF RECEIVING PERSON/AUTHORITY</b> Name: Ltzn Fourie Organisation: DWA	
<b>SIGNATURES</b>	
Name: L. Fourie Signature: [Signature] Date: 17/1/2012 Time: 8:15 Place: East London	Received by: L. Fourie Delivered by: L. Fourie Signature: [Signature] Date: 17/01/2012 Time: 8:16 Place: E.L.

## 27 Appendix G: Site Photographs



Figure 11: ORTDM-IR03 - BP01.

## 28 Appendix H: Competency of Environmental Professional

### Dr. Malcolm Logie

#### Principal and Managing Director

Malcolm Logie has over 12 years experience in the field of Environmental Management with extensive experience in the fields of Industrial Environmental Management; Safety, Health & Environmental Management Systems; and Environmental Auditing and Assessments (environmental site assessments, environmental impact assessments, systems certification), in South Africa, Mocambique, Namibia, Angola, Ghana, Zambia, Egypt, The Czech Republic, The Slovak Republic and Romania. Malcolm has wide-ranging experience primarily in the following sectors:

- Automotive sector
- Beverages
- Chemicals & chemical products
- Civil and mechanical engineering
- Electricity & water supply
- Metals refining & processing
- Mining & quarrying
- Pulp & paper
- Telecommunications

Malcolm's project experience largely falls into the following broad areas:

#### *Safety, Health & Environmental Management Systems*

Malcolm's experience includes management system design and implementation and also certification audits across a wide range of industrial and mining sectors in South Africa, Mocambique, Angola, Zambia and Romania.

#### *Environmental Site Assessments*

Malcolm has been the project leader on many Phase I and II ESA's that have been undertaken in accordance with the ASTM standards, at several industrial facilities in South Africa.

#### *Environmental Auditing*

Malcolm's auditing experience includes ISO 14001, OHSAS 18001 and ISO 9001 certification level audits; legal compliance, and environmental performance audits across a wide range of industrial and mining sectors in South Africa, Mocambique, Namibia, Angola, Ghana, Zambia, Egypt, The Czech Republic and Romania.

#### *Environmental Impact Assessments*

Malcolm has managed a broad range of environmental impact assessments ranging from: industrial facilities, telecommunication networks, electrification networks, transportation infrastructure, waste sites and water supply.

#### Professional Affiliations & Registrations

- Registered as a Professional Natural Scientist (Environmental Scientist) with the South African Council of Natural Scientific Professions (SACNASP).
- Professional Member of the South African Institute of Ecologists and Environmental Scientists
- Certification Board of Environmental Assessment Practitioners of South Africa
- International Association of Impact Assessors
- Royal Society of South Africa
- South African Association of Botanists
- Phycology Society of South Africa
- South African Auditor & Training Certification Association (SAATCA) – EMS Verification Auditor
- Bureau Veritas Quality International – Lead EMS Auditor

#### South African Council of Natural Scientific Professions

Malcolm is a member of the Education Committee of South African Council of Natural Scientific Professions (SACNASP) for the registration of Professional Natural Scientist.

#### Rhodes University Investec Schools of Business

Malcolm sits on the Advisory Board for the Rhodes University Investec Schools of Business which provides advice and directs the strategic planning and continual development of the business school.

#### Fields of Competence

- Safety, Health & Environmental Management Systems
- Industrial Environmental Management
- Environmental Site Assessments

- Environmental Impact Assessments

#### Education

- PhD (Biotechnology) 1995
- MSc (Botany), 1992
- BSc Honours (Botany), 1990
- BSc (Plant Science & Biochemistry), 1989

#### Key Projects

Recent key projects include:

##### South African Breweries Millers (SAB Miller)

1. Ursus Breweries, Romania (SAB Miller), where Malcolme is responsible for the development and implementation of a Safety, Health & Environmental Management System at four breweries and a depot.
2. Plzeňský Prazdroj, Czech Republic (SAB Miller), where Malcolme is responsible for the development and implementation of an integrated Safety, Health & Environmental Management System at three breweries.
3. Dreher Sörgyárak Zrt, Hungary (SAB Miller), where Malcolme is responsible for the development and implementation of an integrated Safety, Health & Environmental Management System at this brewer.
4. Ibhayi Brewery (Port Elizabeth) where an Environmental Management System was designed and implemented at this new state-of-art brewery. During the construction of the brewery Malcolme reviewed all the plans to ensure environmental sustainability

##### BHP Billiton (MOZAL), Mocambique

Malcolme designed and co-ordinated the implementation of the Environmental Management System at this BHP Billiton aluminium smelter in Maputo, and continues to service this organization environmental management needs.

##### Coca-Cola Company

1. Malcolme is the appointed SHE Management System Consultant to Coca-Cola Company Southern Africa, responsible for advising of the implementation of a SHE MS compliant with ISO 14001:2004, OHSAS 18001:1999 and the Coca-Cola Worldwide E3 programme.
2. Malcolme is guiding to process for the development and implementation of an integrated SHE Management System at Coca-Cola Fortune (Polokwane & Bloemfontein). The management system is based on the requirements of ISO 14001:2004 and OHSAS 18001:1999.

##### Lonmin Platinum, South Africa

Malcolme co-ordinated the design and implementation of the Environmental and Quality Management System at Lonmin's Western Platinum Refinery in Johannesburg, and also revised and re-establish the EMS at this platinum producers smelter and base metal refinery near Rustenburg.

##### Dorbyl Automotive Technologies, South Africa.

For the past eight years Malcolme has been the exclusive environmental management and environmental management systems consultant to this automotive components producer. The production facilities include: foundries, forges, machine shops and manufacturing units.

##### Telkom SA Ltd, South Africa.

Malcolme was instrumental in establishing the internal environmental assessment guidelines for this national telecommunication service provider, for the placement of telecommunication masts and associated infrastructure. He has also undertaken more than 120 environmental impact assessments of individual telecommunication masts throughout South Africa.

##### Environmental Site Assessments

Malcolme has been the project leader on many Phase I and II ESA's that have been undertaken in accordance with the ASTM standards, at several industrial facilities in South Africa.

##### SHEQ Management Systems Auditing

Malcolme has in excess of 8600 hours of SHEQ Management Systems auditing. He has audited companies in South Africa, Mocambique, Namibia, Angola, Ghana, Zambia, Egypt, The Czech Republic, The Slovak Republic and Romania.

#### European Scope of Accreditation

Malcolme has competency in the following Industrial Sectors:

1	Agriculture, forestry, fisheries	20	Ship building
2	Mining & quarrying	21	Aerospace
3	Beverages & foodstuff industries	22	Other transport equipment (automotive, rail)
4	Textile industries	23	Manufacturing (not classified elsewhere)
5	Leather & leather products	24	Recycling
6	Wood industries	25	Electricity supply
7	Pulp, paper & paper products	26	Gas supply
10	Mineral-oil processing	27	Water supply
12	Chemicals & chemical products	28	Construction
13	Pharmaceuticals	30	Hotels & restaurants
14	Rubber & plastic goods	31	Transport & communication
15	Glass, ceramics, processing of minerals & ores	34	Research & development
16	Production of cement, lime, gypsum & concrete, lime and gypsum products	35	Business services
17	Metals refining & processing, & production of metals	37	Education
18	Mechanical engineering	39	Other social services

**Ms. Lee-Anne Proudfoot**  
**Senior Environmental Consultant**  
**MSc (Marine Biology), Rhodes**

*Lee-Anne Proudfoot has experience in the fields of Marine and Coastal Ecology, Geographical Information Systems (GIS), Environmental Impact Assessments, Environmental Site Assessments, Environmental Management Plans, Environmental Auditing, Visual Impact Assessments, Aquatic Impact Assessments and Project Management.*

Lee-Anne's project experience includes:

**Environmental Impact Assessments**

Lee-Anne assisted in and managed a broad range of scoping & environmental impact assessments ranging from: agri-industrial & industrial facilities, residential & resort developments, golf estates, renewable energy technologies, storm water management, water supply, desalinisation and sewage.

**Environmental Site Assessments**

Lee-Anne has experience in site assessments, field sampling & monitoring, permit applications and in the compilation of reports for prospective land buyers.

**Environmental Management Plans**

Lee-Anne has experience in compiling and monitoring the Environmental Management Plans for a wide range of developments.

**Environmental Auditing**

Lee-Anne has experience in auditing the environmental compliance of and compiling environmental auditing reports.

**Geographical Information Systems (GIS)**

Lee-Anne has experience in using ArcView, Idrisi and Manifold software in assessing & producing maps, site plans, aerial photographs, etc.

**Visual Impact Assessments (VIA)**

Lee-Anne has experience in conducting VIA's and compiling VIA reports.

**Aquatic Impact Assessments (AIA)**

Lee-Anne has experience in conducting SASS5 Bio-rapid assessments for Aquatic Impact Assessments.

**Project Management**

Lee-Anne has experience in managing projects for a wide range of developments.

**Professional Affiliations & Registrations**

- Registered as a Professional Natural Scientist (Environmental Scientist) with the South African Council of Natural Scientific Professions (SACNASP).
- International Association of Impact Assessors, South Africa

**Fields of Competence**

- Environmental Impact Assessments
- Environmental Site Assessments
- Environmental Management Plans
- Environmental Auditing
- Geographical Information Systems (GIS)
- Visual Impact Assessments (VIA)
- Aquatic Impact Assessments (AIA)
- Project Management

**Education**

- M.Sc. (Marine Biology), Rhodes, 2006
- B.Sc. Honours (Marine Biology), Rhodes, 2003
- B.Sc. (Zoology and Ichthyology), Rhodes, 2002

**Key Projects**

**African Dune Investments (Pty) Ltd**

Lee-Anne is currently undertaking the environmental impact assessment and managing the environmental authorization process for the proposed Woodlands Golf Estate.

**ABSA Development Company/Bigen Africa**

Lee-Anne was the project manager for the environmental management component of the Albany Regional Water Services Project and conducted the environmental impact assessment

**African Dune Investments (Pty) Ltd**

Lee-Anne managed the scoping assessment for a proposed Wind Turbine Farm.

**Amatola Green Power (Pty) Ltd**

Lee-Anne managed and conducted the environmental impact assessment for the proposed extraction of landfill gas from three BCM Landfill Sites for the purposes of electricity generation.

**The Environmental Law Consultancy**

Lee-Anne assisted in the compilation of a Legal Register for a Chrome Tanning Salts Plant in Merebank, with her focus pertaining to the relevant Occupational Health and Safety legislation.

**KRAFT Foods SA**

Lee-Anne reviewed and assisted in the preparation of an Environmental Impacts and Aspects Register, inclusive of the significance assessment and proposed mitigation/management strategies for all the Kraft Foods SA – Tunney Plant's activities for purposes of implementation of an Environmental Management System.

#### **Element Consulting**

Lee-Anne is currently undertaking the environmental impact assessment and environmental management plan for the construction of roads and utilisation of borrow pits in the Eastern Cape

#### **SAB (PTY) LTD**

Lee-Anne conducted the phase 1 Environmental Site Assessment for a prospective land purchase.

#### **International Finance Corporation**

Lee-Anne co-ordinated and reviewed the specialist environmental studies required for the environmental impact assessment for the proposed Kalakundi Copper & Cobalt Mine in the Democratic republic of Congo.

#### **Carpano Investments (Pty) Ltd**

Lee-Anne was responsible for the environmental management component of the Spatial Development Framework for the proposed Rock Cliff development area south-east of East London

#### **Kempston Leisure (Pty) Ltd**

Lee-Anne managed the environmental authorization process for a proposed motor city

#### **Edcot Trust (Pty) Ltd**

Lee-Anne managed the environmental authorization process for a proposed motor city

#### **Kempston Leisure (Pty) Ltd**

Lee-Anne is the Environmental Control Officer for the proposed motor city development.

#### **Wild Coast Ski Boat Club**

Lee-anne undertook the renewal application for a boat launching permit and prepared the requested environmental management plan for the Hole in the Wall Launch Site

#### **Wild Coast Fishing Co-operative**

Lee-Anne conducted and managed the environmental authorization process for a proposed aquaculture facility

#### **Wild Coast Fishing Co-operative**

Lee-Anne conducted and managed the scoping assessment for a proposed fish processing factory

#### **Alvitex 103 (Pty) Ltd**

Lee-Anne assisted on the environmental impact assessment for the proposed resort development.

#### **Rakel (Pty) Ltd**

Lee-Anne managed the environmental impact assessment for desalination plants servicing the proposed resort developments

#### **Alvitex 103 (Pty) Ltd**

Lee-Anne managed the environmental impact assessment for desalination plants servicing the proposed resort developments

#### **Leisure Homes for Senior Citizens**

Lee-Anne managed the environmental authorization process for the proposed extension of a retirement village

#### **Fire Ring**

Lee-Anne was involved in the compilation of a site assessment report for the prospective purchasing of land

#### **Blue Beacon Investments (Pty) Ltd**

Lee-Anne conducted and managed the environmental authorization process for the Connemara Housing Complex

#### **Buffalo City Municipality – Waste Management**

Lee-Anne assisted in the environmental audit process on the Buffalo City Regional Waste Disposal Site, focussing on issues such as operations and water-quality monitoring.

#### **Buffalo City Development Agency**

Lee-Anne was responsible for the environmental assessment component of the Nahoon Mouth and Sports Precinct Local Spatial Framework Plan.

#### **Southern Palace Investments 414 (Pty) Ltd**

Lee-Anne conducted and managed the scoping and environmental impact assessment for environmental authorization for a proposed mixed use development for the purposes of a hospital, retirement village and church.

#### **Nuffield Trust**

Lee-Anne conducted and managed the environmental impact assessment for the environmental authorization of a proposed Yellowwood Heights Residential Development

#### **Riverleigh VII**

Lee-Anne conducted and managed the Scoping Assessment for a proposed mixed use development for the purposes of entry level residential, office and retail.

#### **True Group Building (Pty) Ltd**

Lee-Anne conducted and managed the environmental impact assessment for the environmental authorization of a proposed light industrial site.

**Mr. Conroy van der Riet**  
**(Pr. Sci. Nat. - Environmental Scientist)**  
**Senior Environmental Consultant**

*Conroy van der Riet has more than 5 years' experience in the fields of Marine and Terrestrial Ecology, Geography, Geographical Information Systems (GIS), Mining, Environmental Impact Assessments, Environmental Site Assessments, Environmental Management Plans, Environmental Management Systems, Environmental Auditing, Visual Impact Assessments, Site Rehabilitation, Water Use Licensing, Waste Licensing and project management throughout South Africa.*

Conroy's project experience includes:

*Environmental Impact Assessments*

Conroy assisted in and managed a broad range of environmental impact assessments ranging from: agri-industrial & industrial facilities, residential & resort developments, golfing estates, informal settlement planning & formalisations, storm water management, water supply, desalinisation and sewage.

*Environmental Site Assessments*

Conroy has experience in many Phase I and II site assessments in accordance with ASTM Standards, SASS 5 freshwater aquatic systems assessments, field sampling & monitoring, permit applications and in the compilation of reports for prospective land buyers.

*Environmental Management Plans*

Conroy has experience in compiling and monitoring the Environmental Management Plans for a wide range of developments, including the mining sector.

*Environmental Management Systems*

Conroy's experience includes Environmental Management System design and implementation, legal compliance audits, and risk assessments in compliance with relevant ISO Standards.

*Environmental Auditing*

Conroy's auditing experience includes ISO 14001, OHSAS 18001 and ISO 9001 certification level audits; legal compliance, and environmental performance audits across a wide range of industrial sectors in South Africa.

*Geographical Information Systems (GIS)*

Conroy has experience in using ArcView, Idrisi and Manifold software in assessing & producing environmental sensitivity maps, site plans, aerial photographs, satellite imagery, etc.

*Visual Impact Assessments (VIA)*

Conroy has experience in conducting VIA's and compiling VIA reports.

*Site Rehabilitation*

Conroy has experience in the rehabilitation of a variety of disturbed/contaminated areas.

*Water Use Licensing*

Conroy has experience in a range of Water Use License application and related projects.

*Waste Licensing*

Conroy has experience in Waste License Applications for a projects ranging from landfill sites to waste water treatment works.

*Project Management*

Conroy has experience in managing projects for a wide range of developments.

**Professional Affiliations & Registrations**

- Registered as a Professional Natural Scientist (Environmental Scientist) with the South African Council of Natural Scientific Professions (SACNASP).
- International Association of Impact Assessors, South Africa

**Fields of Competence**

- Environmental Impact Assessments
- Environmental Management Plans/Programmes
- Environmental Site Assessments
- Environmental Management Systems
- Environmental Auditing
- Geographical Information Systems (GIS)
- Visual Impact Assessments (VIA)
- Site Rehabilitation
- Water Use Licensing
- Waste Licensing
- Project Management

**Education**

- BSc Hons (Environmental Geography) NMMU, 2006
- BSc (Zoology and Geography) NMMU, 2005

**Employment Record**

- Biotechnology & Environmental Specialist Consultancy cc: 2006 - Present:

**Key Projects****Transnet National Ports Authority**

Conroy managed the soil contamination assessment (inclusive of soil sampling & rehabilitation measures) for the Port of East London. Conroy also managed the Listed Invasive & Protected Plant Species survey for the Port of East London.

**PG Bison**

Conroy assisted in the preparation of an Environmental Aspects Register, inclusive on significance assessment and proposed mitigation/management strategies for all the PG Bison activities at the board plant in Ugie, Eastern Cape for purposes of implementation of an Environmental Management System.

**Kraft Foods SA**

Conroy conducted the Phase I Environmental Site Assessment in accordance with the ASTM standards, and assisted in the preparation of an Environmental Aspects Register, inclusive on significance assessment and proposed mitigation/management strategies for all the Kraft Foods SA - Tunney Plant's activities for purposes of implementation of an Environmental Management System.

**Goodyear SA**

Conroy managed the Scoping process for the proposed installation of Underground Storage Vessels at the Goodyear SA factory.

**East London Industrial Development Zone**

Conroy assisted in auditing the Environmental Management System of the EL IDZ and is managing the revision of the Environmental Management Framework of the EL IDZ.

**Pragma Africa (Pty) Ltd**

Conroy managed the environmental authorization process for the removal of underground fuel storage vessels.

**Buffalo City Municipality - Waste Management**

Conroy assisted in the environmental audit process on the Buffalo City Regional Waste Disposal Site, focussing on issues such as construction, operations and air-quality monitoring.

**SANRAL**

Conroy managed the environmental authorization process for the proposed improvement of National Route 02, Section 18 for the South African National Roads Agency Limited. Conroy is also managing the mining permit applications of the borrow pits for the proposed road improvement, and appointed as Environmental Control Officer for the implementation of the entire project.

**Department of Roads & Public Works**

Conroy managed in excess of 100 mining permit applications for borrow pits utilized in road maintenance/re-gravelling projects throughout the entire Eastern Cape Province (urban & rural).

**Bigen Africa (Pty) Ltd, Absa DevCo & Ndlambe Local Municipality**

Conroy managed the environmental authorization process for the proposed Port Alfred Waste Water Treatment Works upgrade project. Conroy was also appointed to act as the Environmental Control Officer for the implementation of Thornhill Housing project.

**Uhambiso Consult**

Conroy managed the environmental authorization and Waste License Application process for the proposed Tsolo Waste Water Treatment Works upgrade project.

**Chris Hani District Municipality - Bulk Services**

Conroy is managing the environmental authorization and Waste License Application process for the proposed upgrading of the Bulk Services for the proposed Rathwick Development, Queenstown, inclusive of the Waste Water Treatment Works, Water Treatment Works, Stormwater and associated infrastructure.

**Chris Hani District Municipality - Water Supply**

Conroy managed the environmental authorization process for four major regional Water Supply Backlog projects in the Cluster 2 area of the Chris Hani District Municipality, Eastern Cape.

**Alvitex 103 (Pty) Ltd**

Conroy managed the environmental authorization process for a proposed golfing estate development as well as a separate residential development.

**African Dune Investments**

Conroy assisted in the environmental authorization for a proposed golf estate development.

**Thynk Property Partners (Pty) Ltd**

Conroy managed the environmental authorization process for the proposed retail & residential development.

**Eskom**

Conroy managed the environmental authorization process for the proposed upgrading of the Qumbu Substation and associated infrastructure.

**Buffalo City Municipality - Planning and Economic Development**

Conroy managed the environmental authorization for various settlement planning & formalization projects in the Amathole District.

**The Diocese of Grahamstown**

Conroy managed the environmental authorization for the proposed rezoning and residential development of the St Lukes Mission Land.

**Bunker Hills Investments (Pty) Ltd**

Conroy managed the environmental management plan and acted as Environmental Control Officer for the proposed residential development.

**Rakel (Pty) Ltd**

Conroy assisted in managing the environmental authorization for the proposed residential development and assisted in the environmental impact assessment for the proposed desalination plant servicing the proposed residential development.

**Rapitrade (Pty) Ltd**

Conroy assisted in managing the environmental management plan for the proposed residential development and managed the applications to the South African Heritage Resources Agency (SAHRA) and the Department of Water Affairs & Forestry.

**Golden Falls (Pty) Ltd**

Conroy assisted in the environmental authorization and the environmental management plan for the proposed residential development.

**Beautiful Connections (Pty) Ltd**

Conroy managed the environmental authorization process for a proposed wildlife resort in the Queenstown area and the proposed development of Eco-Type chalets in the East London area.

**Riverleigh VII cc**

Conroy managed the environmental authorization process for the proposed warehousing and light industrial manufacturing processes developments.

**Purple Moss 29 (Pty) Ltd**

Conroy managed the rehabilitation of the Quenera River bank on the site and the environmental authorization process for the proposed township establishment consisting of business, mixed use and residential areas.

**Silicon Smelters (Pty) Ltd (FerroAtlantica)**

Conroy managed the environmental impact assessment process and CAPCO permit applications for various charcoal burners in the East Cape, West Cape, Free State, North-West, Limpopo and Gauteng Provinces.

**Wild Coast Fishing Co-operative**

Conroy assisted in the environmental authorization for the proposed fish works factory.

**Tshani Deep Sea Angling Association**

Conroy managed the environmental authorization and re-licensing of the Mdumbi ski-boat launching site, Eastern Cape.

**ELGC**

Conroy managed the EIA Process and prepared the rehabilitation management plan for the proposed realignment of the 6<sup>th</sup> fairway & minor upgrades in order to upgrade the East London Golf Club (ELGC).

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