

CLOSURE PLAN FOR THE CLOSURE OF THE KLIPGATKOP PROSPECTING RIGHT

Klipgatkop 115 JQ

SUBMITTED FOR APPLICATION FOR A CLOSURE CERTIFICATE IN TERMS OF SECTION
43 OF THE MPRDA

AUGUST 2019

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Reviewer (PrSciNat)

BASIS OF REPORT

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CLOSURE PLAN FOR THE CLOSURE OF THE KLIPGATKOP PROSPECTING RIGHT

EXECUTIVE SUMMARY

PROJECT BACKGROUND

The Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture (RBRP/Impala JV) hold a prospecting right MPT number 638/2007 PR (DMR reference number NW30/5/1/1/2/519 (10368) PR) for platinum group metals (PGMs), silver, gold ore, cobalt, chrome ore and nickel ore on the Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ (Klipgatkop). The prospecting right area is located approximately 21 km north east of Rustenburg in the Rustenburg Local Municipality and the Bojanala Platinum District Municipality in the North West Province. The regional and local settings are illustrated in Figure 1 and Figure 2 respectively. The abovementioned prospecting right is included in Appendix A.

Between May 2007 and June 2014, Impala on behalf of the RBRP/Impala JV undertook prospecting activities on the farm Klipgatkop, during which time eight approved exploration drill holes were drilled.

Impala has faced tremendous economic and financial challenges throughout the last few years. The RBRP/Impala JV thus proposes to close the Klipgatkop prospecting right.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Impala on behalf of the RBRP/Impala JV to manage the environmental authorisation processes associated with the closure of the Klipgatkop prospecting right.

SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the prospecting right, the following is required:

- A Closure Certificate from the DMR in terms of Section 43(4) of the MPRDA.
- An environmental authorisation from the DMR in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended. The relevant listed activity is Activity 22 of Listing Notice 1: The decommissioning of any activity requiring a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced prior to the submission of the Closure Plan Report and has continued throughout the environmental assessment process. As part of this process, commenting authorities and interested and affected parties (I&APs) were given the opportunity to review the background information document (BID) and the draft Closure Plan Report, as well as the Basic Assessment Report compiled in terms of NEMA and submit questions and comments to the project team. All comments submitted to date by the commenting authorities and I&APs have been included and addressed in this Closure Plan Report.

The draft Closure Plan Report was distributed for a 30-day comment period from 10 July 2019 to 12 August 2019 in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the closure process. Copies of the full report were available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and hard copies were available at the Roodekraal Community Hall, Rustenburg Public Library and the Royal Bafokeng Civic Centre. Electronic copies (compact disk) of the report were available from SLR, at the contact details provided below. Summaries of the Closure Plan Report were available in English and Setswana and were placed at the Roodekraal Community Hall, Rustenburg Public Library and the Royal Bafokeng Civic Centre.

All comments received during the review process have been addressed in this final Closure Plan Report that is being submitted for decision-making.

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IMPACTS AND MANAGEMENT ACTIONS

This section provides a summary of the assessment of the potential impacts. The potential impacts/risks have been assessed against the prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. Given that decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed, this assessment focusses on potential residual impacts/risks as a result of the rehabilitation phase only. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr, therefore the assessment of the mitigated scenario is where additional mitigation measures are deemed necessary. The table below provides a summary of the potential impacts in no particular order of importance.

Aspect	Potential impact	Reference to mitigation measures	Significance (takes into account measures implemented as per approved EMPr)	
			Unmitigated	Mitigated
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Not Applicable
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable

ENVIRONMENTAL STATEMENT

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BID	Background Information Document
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
I&APs	Interested and Affected Parties
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act
SACNASP	South African Council for Natural Scientific Professions
SLR	SLR Consulting (Africa) (Pty) Ltd

1 INTRODUCTION

This chapter provides a brief description of the project background, describes the purpose of this report, summarises the legislative authorisation requirements, provides the study terms of reference and outlines the opportunity for comment.

1.1 PROJECT OVERVIEW

The Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture (RBRP/Impala JV) hold a prospecting right MPT no 638/2007 PR (DMR reference number NW30/5/1/1/2/519 (10368) PR) for platinum group metals (PGMs), silver, gold ore, cobalt, chrome ore and nickel ore on the Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ (Klipgatkop). The prospecting right area is located approximately 21 km north east of Rustenburg in the Rustenburg Local Municipality and the Bojanala Platinum District Municipality in the North West Province. The regional and local settings are illustrated in Figure 1 and Figure 2, respectively. The abovementioned prospecting right is included in Appendix A.

Between May 2007 and June 2014, Impala on behalf of the RBRP/Impala JV undertook prospecting activities on the farm Klipgatkop, during which time eight approved exploration drill holes were drilled.

Prospecting activities undertaken between May 2007 and June 2014 included:

- Use of existing roads/ tracks (as far as possible).
- Establishment and use of new access tracks where prospecting related vehicles had to deviate from existing roads.
- Drilling of eight approved drill holes (BH7025 drilled in 2007; BH7599, BH7600 and BH7608 – drilled in 2008; BH7799 – drilled in 2009; BH7856 – drilled in 2010, 2011 and 2012, BH8062 – drilled in 2012, and BH8063 – drilled in 2013 and 2014; Figure 3)
- Establishment and use of site equipment and support facilities (drill rigs, trucks, compressor, plastic lined drilling water containment facility (sump), water cart, core sample trays) and portable chemical toilets etc.

With the current economic environment and metal prices RBRP/Impala JV has decided to exit from this Prospecting Right through a closure application.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Impala on behalf of the RBRP/Impala JV to manage the environmental authorisation processes.

1.2 PURPOSE OF THIS REPORT

This Closure Plan has been compiled and distributed for review and comment as part of the process to apply for a closure certificate in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) (MPRDA) as amended. The closure application process is being undertaken for the closure of the Klipgatkop Prospecting Right, near Rustenburg in the North West Province.

This Closure Plan provides a description of the proposed closure project and the affected environment; summarises the closure process followed to date; identifies and assesses the key risks associated with closing the prospecting right and presents a closure plan for the project.

Interested and Affected Parties (I&APs) were asked to comment on the draft Closure Plan Report (see Section below). The document was then updated into a final report, giving due consideration to the comments received. This final Closure Plan Report has been submitted to the Department of Mineral Resources for consideration as part of the closure application in terms of Section 43 of the MPRDA, as amended.

1.3 SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the proposed prospecting right, the following is required:

- A Closure Certificate from the DMR in terms of Section 43(4) of the MPRDA;
- An environmental authorisation from the DMR in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

1.4 TERMS OF REFERENCE

In terms of Regulation 57, Application for a Closure Certificate, the following is required and has been included as part of this report:

- A Closure Plan contemplated in regulation 62 – This report
- An environmental risk report contemplated in regulation 60 – Section 8.2.5
- A final performance assessment report contemplated in regulation 55(9) – Section 8.2.4
- A completed application form contemplated in regulation 58(1) (Form P) – Appendix G

1.5 OPPORTUNITY TO COMMENT

The draft Closure Plan Report was distributed for a 30-day comment period from 10 July 2019 to 12 August 2019 in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the closure process. Copies of the full report were available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and hard copies were available at the Roodekraal Community Hall, Rustenburg Public Library and the Royal Bafokeng Civic Centre. Electronic copies (compact disk) of the report were available from SLR, at the contact details provided below. Summaries of the Closure Plan Report were available in English and Setswana and were placed at the Roodekraal Community Hall, Rustenburg Public Library and the Royal Bafokeng Civic Centre.

All comments received during the review process have been addressed in this final Closure Plan Report.

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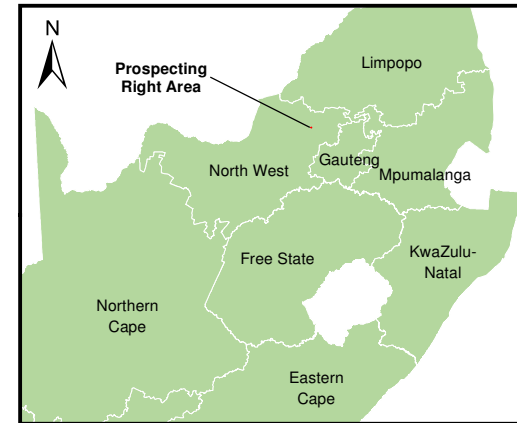
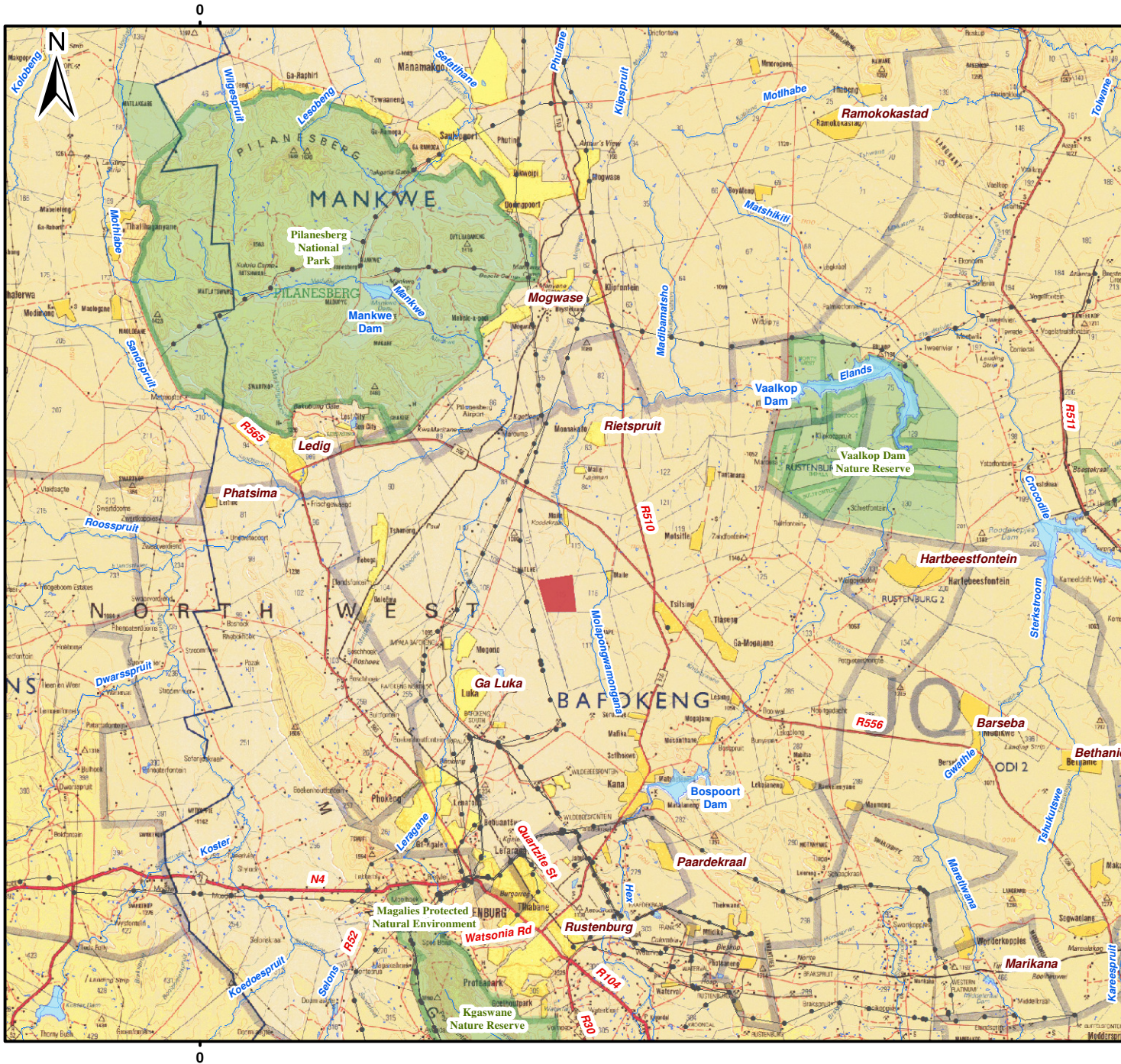
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2 LOCATION OF APPLICATION AREA

A description of the property on which the proposed project is located is provided in Table 2-1. The regional and local settings are illustrated in Figure 1 and Figure 2, respectively. The locations of the drill holes in contained in Figure 3.

TABLE 2-1: DESCRIPTION OF THE PROPERTY

Description	Details
Farm Name	Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ
Closure application area (ha)	520 ha
Magisterial district	The Prospecting Right area is located within the Rustenburg Magisterial District and in the Bojanala Platinum District Municipality.
Distance and direction from nearest town	The proposed project site is located approximately 21 km north west of Rustenburg (Refer to Figure 1).
21-digit Surveyor General Code for each farm portion	Remaining Extent of the farm Klipgatkop 115 JQ - T0JQ00000000011500000 Portion 1 of the farm Klipgatkop 115 JQ - T0JQ00000000011500001
Co-ordinates (Refer to Figure 2)	North eastern corner: 27°15'22.911"E; 25°26'31.002"S South eastern corner: 27°15'31.575"E; 25°27'50.32"S South western corner: 27°14'19.158"E; 25°27'51.177"S North western corner: 27°13'56.367"E; 25°26'41.063"S



Legend

- Klipgatkop Prospecting Right Area
- Main Roads
- Power Line
- Rivers and Streams
- 20m Contour Lines
- Protected Areas
- Dams

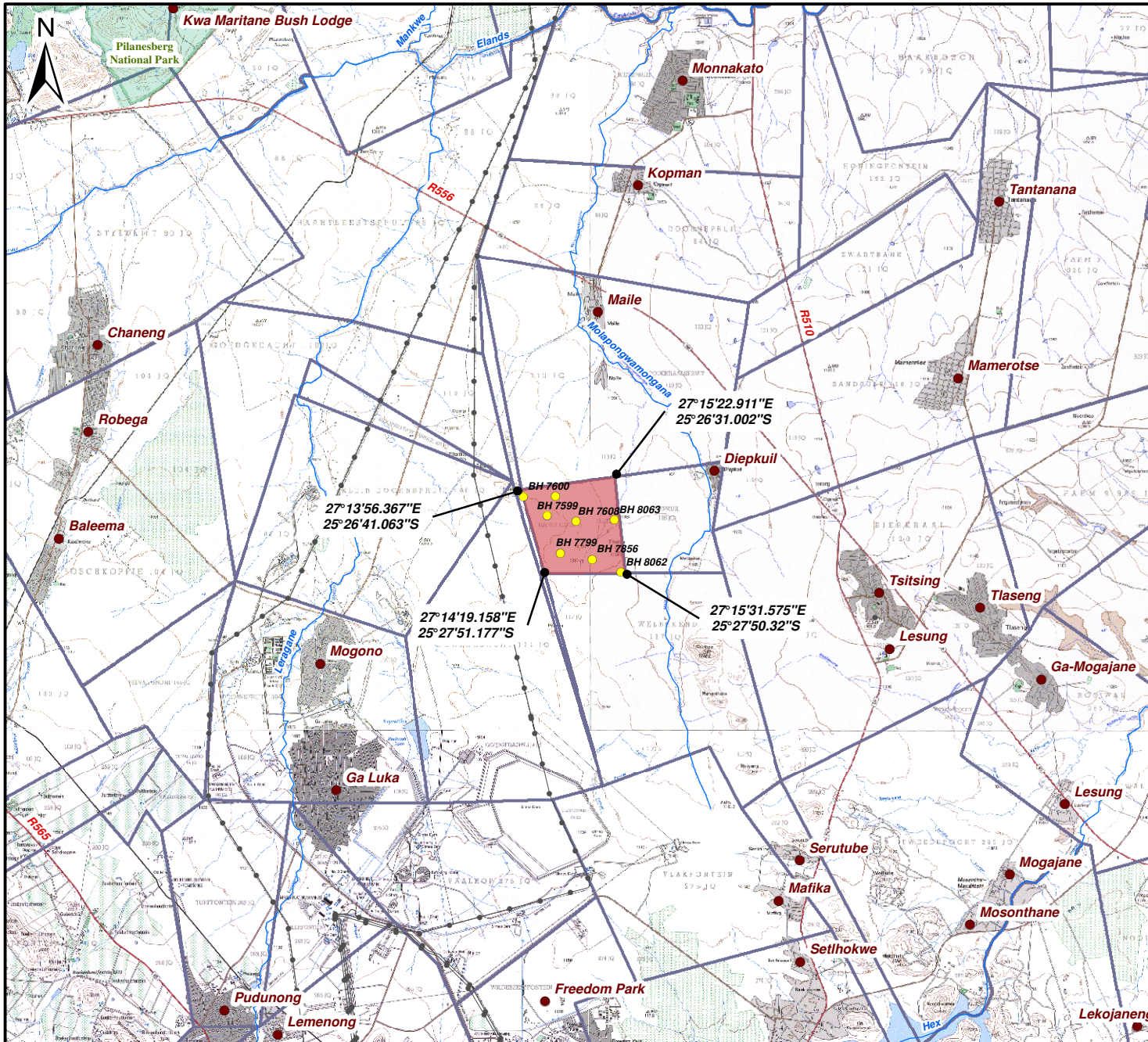
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 Projection: Transverse Mercator
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Closure of the Klipgatkop Prospecting Right

Figure 1

Regional Setting

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Legend

- Klipgatkop Prospecting Right Area
- Villages / Towns
- Protected Areas
- Farm Boundaries
- Main Roads
- Power Line
- Rivers and Streams
- 20m Contour Lines
- Drill Sites

<i>Co-Ords for Drill Sites</i>	
BH7600	27°13'59.422"E 25°26'47.996"S
BH7025	27°14'29.17"E 25°26'47.585"S
BH7599	27°14'21.307"E 25°27'3.632"S
BH7608	27°14'48.22"E 25°27'8.703"S
BH8063	27°15'22.573"E 25°27'6.829"S
BH7799	27°14'33.911"E 25°27'34.308"S
BH7856	27°15'2.645"E 25°27'39.541"S
BH8062	27°15'29.209"E 25°27'49.893"S



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Projection: Transverse Mercator
Datum: Hartebeeshoek, Lo27

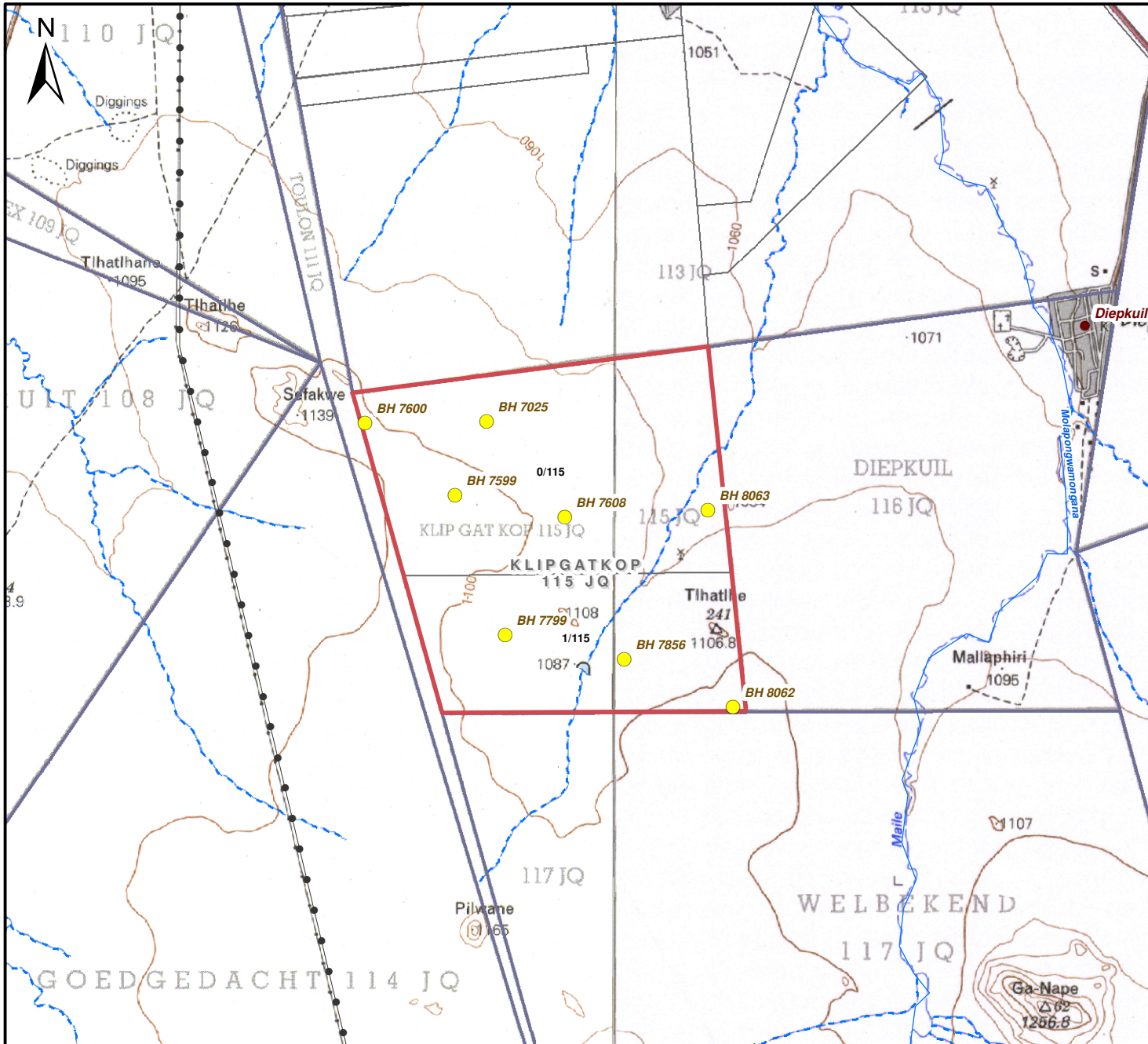
**Closure of the Klipgatkop
Prospecting Right**

Figure 2

Local Setting

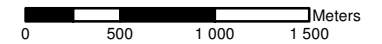


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Legend

- Villages / Towns
- Protected Areas
- ▭ Klipgatkop Prospecting Right Area
- ▭ Farm Boundaries
- ▭ Farm Portions
- Powerline
- Perennial Rivers
- - - Non-Perennial Rivers
- Drill Sites



Scale: 1:40 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartebeeshoek, Lo27

**Closure of the Klipgatkop
 Prospecting Right**

Figure 3

Site Layout



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3 DETAILS OF THE APPLICANT AND THE EAP

3.1 APPLICANT DETAILS

The applicant for the project is the Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture (RBRP/Impala JV). Details are provided in Table 3-1 below. Through a resolution, Impala can sign on behalf of the RBRP/Impala JV.

TABLE 3-1: APPLICANT DETAILS

Name:	The Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture (RBRP/Impala JV)
Address:	Impala Platinum Limited – Head Office No. 2 Fricker Road Illovo 2196
Contact No.	+27 11 731 9063
Responsible person:	Elrina Lategan

3.2 DETAILS OF THE EAP WHO PREPARED THE REPORT

As noted in Chapter 1, SLR has been appointed as the independent EAP to undertake the process for the proposed closure of the prospecting right. The details of the EAP project team that are undertaking this closure process are provided in Table 3-2.

SLR has no vested interest in the proposed project other than fair payment for consulting services rendered as part of the closure process. An undertaking by SLR is provided in Section 18.

TABLE 3-2: DETAILS OF THE CLOSURE PLAN PROJECT TEAM

General		
Organisation	SLR Consulting (Africa) (Pty) Ltd	
Postal address	PO Box 1596, Cramerview, 2060	
Tel No.	(011) 467 0945	
Fax No.	(011) 467 0978	
Name	Tasks and roles	Email
Alessandra (Alex) Pheiffer (SLR)	Closure Plan and process reviewer	apheiffer@slrconsulting.com
Stephen van Niekerk (SLR)	Financial provision reviewer	svanniekerk@slrconsulting.com
Chiara Kotze (SLR)	Management of the closure process, including public consultation, process review, specialist study review and report compilation	ckotze@slrconsulting.com
Clive Phashe (SLR)	Project assistant and public consultation	cphashe@slrconsulting.com

3.3 EXPERTISE OF THE EAP

Chiara Kotze holds an MSc degree in Ecology, Environment and Conservation and has approximately seven years of relevant experience. Alex Pheiffer holds an MSc degree in Environmental Management and is registered as a professional natural scientist (Environmental Management) with the South African Council for Natural Scientific

Professions (SACNASP) (Appendix B). Alex Pheiffer has over 16 years of relevant experience. Both Chiara Kotze and Alex Pheiffer have been involved in several impact assessments for large scale mining developments in southern Africa. Clive Phashe holds a Bachelor of Science in Life and Environmental Sciences from the University of Johannesburg. Clive has over a year's experience within the environmental consulting field. Clive has assisted in a variety of mining projects since joining the company.

Relevant curricula vitae (including proof of registrations) are attached in Appendix B.

4 MOTIVATION FOR CLOSURE OF THE PROSPECTING RIGHT

Impala has faced tremendous economic and financial challenges throughout the last few years.

As a result thereof, Impala undertook a strategic review of its Impala Rustenburg Operation, and assessed the outlook going forward, particularly in response to the prevailing market conditions. The review included the Roodekraalspruit, Doornspruit, Klipgatkop and Diepkuil Joint Venture projects, adjacent to the Impala Rustenburg Operation.

To this effect a joint decision was made by the RBRP/Impala JV not to proceed with the Joint Venture. The Joint Venture project area was originally secured as certain potential future shafts (for example 18 shaft) at Impala would have exploited some of the mineral resources underlain by this Joint Venture project area. Effectively all plans to develop such new mining infrastructure have been shelved by Impala.

5 CLOSURE OBJECTIVES

The closure objective is to return land disturbed by the prospecting operations to its pre-disturbed state. In this case, the pre-disturbed state was that of:

- Gently undulating plains with low slope gradients, sloping slightly towards the drainage lines crossing the area
- Visually, the landscape has been influenced by subsistence farming activities.
- There is evidence of cattle presence and over-grazing on site
- The vegetation is currently re-establishing in the areas where prospecting activities took place.
- Open veld used for grazing, farming

5.1.1 Confirmation that closure objectives have been consulted with landowners and I&APs

The intended final land use was outlined in the Background Information Document made available to landowners and I&APs for review and initial comment. The closure objective and closure plan for the prospecting right area is outlined in this report which was made available for review and comment to landowners and I&APs (see Section 15 for further details).

Comments received from landowners and I&APs have been summarised in Section 15.5 and included in full in Appendix C of this report.

5.1.2 Regulatory requirements and conditions for closure

The regulatory requirements for closure are included in Section 15.

The conditions for closure are outlined below:

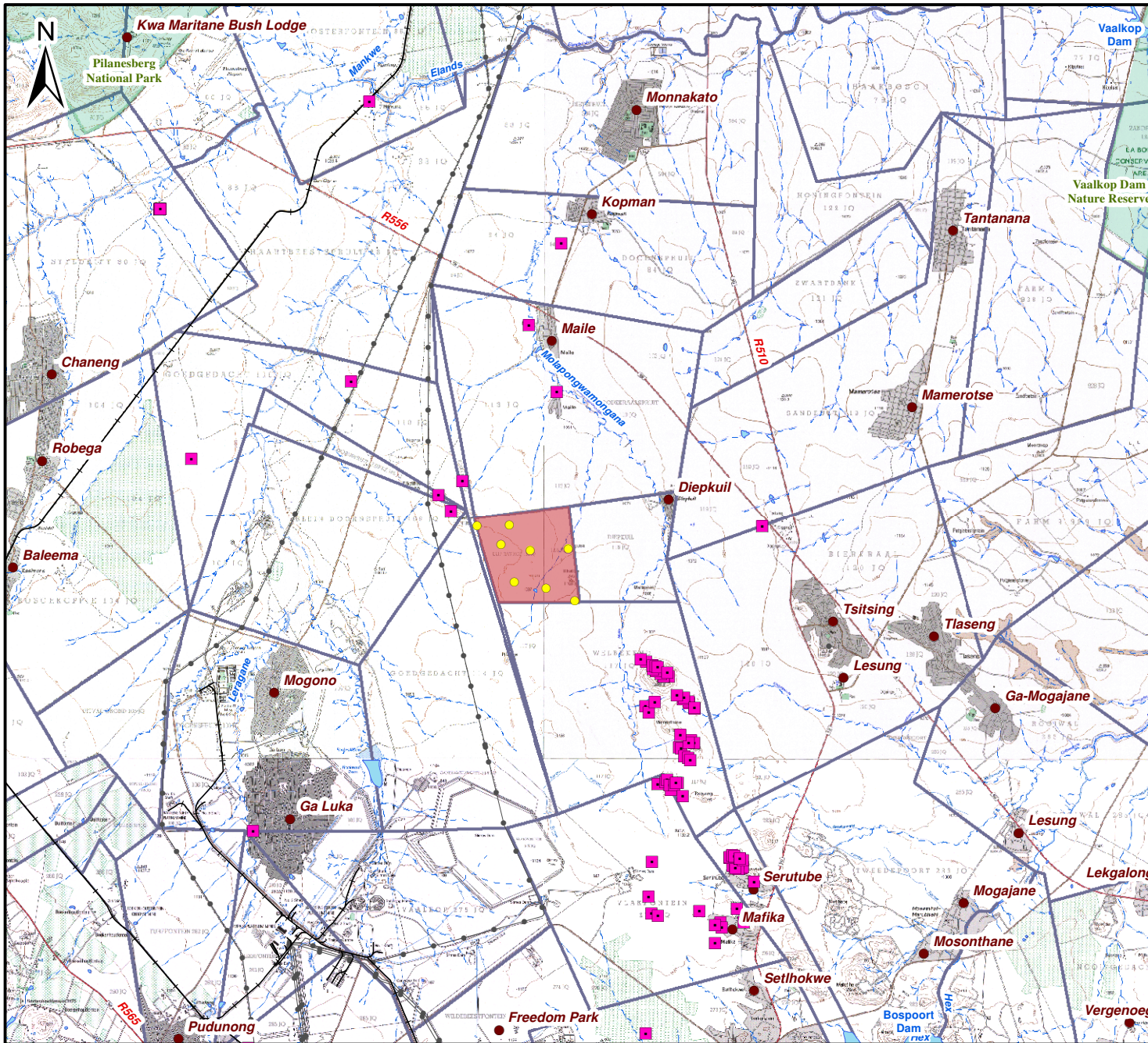
- Achieve physical stability over all landscapes disturbed by prospecting activities.
- Return land to its pre-disturbance potential.
- Maximise visual 'harmony' with the surrounding landscape.

5.1.3 Rehabilitation plan

Rehabilitation of the prospecting sites has been undertaken as outlined in Section 9 and Section 10.1. In accordance with the MPRDA Closure Plan requirements (Regulation 62b), a plan showing the area under closure including the final and future land use is presented in Figure 4.

5.1.4 Compatibility of the rehabilitation plan with the closure objectives

It can be confirmed that the rehabilitation plan is compatible with the closure objectives given that the closure objectives were taken into account during the determination of the financial provision.



Legend

- Villages / Towns
- Protected Areas
- Klipgatkop Prospecting Right Area
- ▭ Farm Boundaries
- Main Roads
- Power Line
- 20m Contour Lines
- Railway Lines
- Perennial Rivers
- - - Non-Perennial Rivers
- Inland Water and Dams
- Heritage Sites
- Drill Sites
- Urban
- Cultivated
- Dongas and Erosion



Scale: 1:150 000 @ A4

Projection: Transverse Mercator
Datum: Hartbeeshoek, Lo27

**Closure of the Klipgatkop
Prospecting Right**

Figure 4

Land Use

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6 PLAN OF AREA UNDER CLOSURE

A plan showing the area under closure including the final and future land use is presented in Figure 4.

7 REGULATORY REQUIREMENTS AND CONDITIONS FOR CLOSURE

This chapter outlines the key legislative requirements applicable to the proposed project and outlines the guidelines, policies and plans that have been taken into account during the closure application process.

7.1 LEGISLATIVE CONSIDERATION IN THE PREPARATION OF THE CLOSURE REPORT

Table 7-1 below provides a summary of the applicable legislative context.

TABLE 7-1: LEGAL FRAMEWORK

Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the policy and legislative context?
Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA), as amended and supporting Regulations	Introduction and Table 7-4	An outline of the legislation is presented in Section 7.1. The project will require a closure certificate.
National Environmental Management Act (No. 107 of 1998) (NEMA), as amended and 2014 EIA Regulations, as amended	Section 1.3 and Section 5.1.2	An outline of the legislation is presented in Section 7.1. The project will need to comply with the principles of NEMA. The project also triggers a listed activity.
Financial Provisioning Regulations, 2015 (GN 1147)	Section 12	A Financial Provision is required in line with the NEMA Regulations and the MPRDA Closure Reporting requirements and is included in this report.
Alien Invasive Species Regulations GN 598 of 2014 in terms of the NEM:BA	Section 8.1	These regulations have been used to inform the rehabilitation of the site.
Alien and Invasive Species List, GN 864 of 2016		
National Heritage Resources Act (No 25 of 1999).		

7.1.1 Mineral and Petroleum Resources Development Act, 2002 and Regulations (No. 28 of 2002)

The Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA) governs the acquisition, use and disposal of mineral and petroleum resources. Section 43 of the MPRDA governs the issuing of a closure certificate. In this regard, the holder of a prospecting right remains responsible for any environmental liability, pollution, ecological degradation, the pumping and treatment of extraneous water, compliance to the conditions of the environmental authorisation and the management and sustainable closure thereof, until the Minister has issued a closure certificate in terms of the Act to the holder of the prospecting right.

Upon the lapsing, abandonment or cancellation of the right the holder of a prospecting right must apply for a closure certificate.

No closure certificate may be issued unless:

- the Council for Geoscience has confirmed in writing that complete and correct prospecting reports in terms of Section 21(1) of the MPRDA have been submitted to the Council for Geoscience;
- the complete and correct records, drill hole core data or core-log data that the Council of Geoscience may deem relevant, have been lodged with the Council for Geoscience; or
- in the case of the holder of a permit or right, the complete and correct surface and the relevant underground geological plans have been lodged with the Council for Geoscience.

Regulation 57 of the Mineral and Petroleum Resources Development Regulations details the requirements for applying for closure certificates by a holder of a prospecting right.

In this regard a closure application must be accompanied by:

- A closure plan contemplated in Regulation 62;
- An environmental risk report contemplated in Regulation 60;
- A final performance assessment report contemplated in Regulation 55(9); and
- A completed application form contemplated in Regulation 57.

The above requirements for application for a closure certificate are addressed in the following sections of this report:

TABLE 7-2: REQUIREMENTS FOR APPLICATION FOR CLOSURE CERTIFICATE

Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA), as amended	Requirement	Reference in the EMPr report
Regulation 62	Closure plan	Refer to Table 7-4
Regulation 60	Environmental risk report	Refer to Sections 278.2.18.2.5
Regulation 55(9)	Final performance assessment report	Refer to Section 8.2.4
Regulation 57	Completed application form (Form P)	Refer to Appendix G

The proposed project is for the closure of a prospecting right. Therefore, the project requires a closure certificate in terms of Section 43 of the MPRDA, and therefore an application as contemplated in Regulation 57 is required in order for the DMR to consider closure of the prospecting site. This information has been included in this report.

In addition, the regulations define the following terms:

- Residual environmental impact – means the environmental impact remaining after a closure certificate has been issued.
- Latent environmental impact – means any environmental impact that may result from natural events or disasters after a closure certificate has been issued.

7.1.2 Guidelines, Policies, Plans and Frameworks

The guidelines, policies and plans listed in Table 7-3 have been taken into account during the closure process, where applicable.

TABLE 7-3: GUIDELINE AND POLICY FRAMEWORK

Guideline	Governing body	Relevance
Public participation guideline in terms of NEMA (2017)	Department of Environmental Affairs	The purpose of this guideline is to ensure that an adequate public participation process is undertaken during the closure process.
Guideline on need and desirability (2017)		This guideline informs the consideration of the need and desirability aspects of the proposed project.
Planning for Integrated Mine Closure: toolkit; International Council on Mining and Metals.	International Council on Mining and Metals	This toolkit aims to assist in making decisions based on consideration of closure aspects in a holistic manner.
Rustenburg Local Municipality Integrated Development Plan 2018-2019	Rustenburg Local Municipality	The Rustenburg Local Municipality Integrated Development Plan is the principle strategic instrument guiding all planning, management, investment and development within the province in order to provide best solutions towards sustainable development.

Bojanala Platinum District Municipality Integrated Development Plan 2017-2022	Bojanala Platinum District Municipality	The Bojanala Platinum District Municipality Integrated Development Plan is the principle strategic instrument guiding all planning, management, investment and development within the province in order to provide best solutions towards sustainable development.
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7.2 LEGISLATIVE CLOSURE REPORT CONTENT REQUIREMENTS

This document has been prepared in accordance with the closure plan requirements of Regulation 62 of the MPRDA Regulations. Table 7-4 provides a summary of the requirements, with cross references to the report sections where these requirements have been addressed.

TABLE 7-4: CONTENTS OF THE CLOSURE PLAN

MPRDA Closure Report Requirements as per Section 62 of MPRDA Regulations	Reference in the Closure Plan
A description of the closure objectives and how these relate to the prospecting or mine operation and its environmental and social setting	Section 5
A plan contemplated in regulation 2(2), showing the land or area under closure	Section 6 Figure 4
A summary of the regulatory requirements and conditions for closure negotiated and documented in the environmental management programme or environmental management plan, as the case may be	Section 7
A summary of the results of the environmental risk report and details of identified residual and latent impacts	Section 8
A summary of the results of progressive rehabilitation undertaken	Section 9
A description of the methods to decommission each prospecting or mining component and the mitigation or management strategy proposed to avoid, minimize and manage residual or latent impacts	Section 10
Details of any long-term management and maintenance expected	Section 11
Details of a proposed closure cost and financial provision for monitoring, maintenance and post closure management	Section 12
A sketch plan drawn on an appropriate scale describing the final and future land use proposal and arrangements for the site	Section 13 Figure 4
A record of interested and affected persons consulted	Section 15
Technical appendices, if any	Section 16

8 ENVIRONMENTAL RISK ASSESSMENT AND IDENTIFIED RESIDUAL AND LATENT IMPACTS

8.1 BASELINE ENVIRONMENT AFFECTED BY THE PROPOSED ACTIVITY

Environmental attributes associated with the prospecting right area are presented in this section.

As part of verifying baseline conditions within the site, SLR undertook a site visit of the prospecting right area in April 2019. In addition, where relevant, information from available reports (see reference list included in Section 19) has been used.

It was noted during the site visit that grazing by livestock has influenced the environmental attributes of the area.

To provide a visual context of the site conditions at each drill hole, photographs reflecting the current status of the sites (taken in April 2019) are presented in Figure 5.



BH7025 (drilled in 2007). Vegetation has successfully re-established (photo taken in 2019)



BH7599 (drilled in 2008). Very small section around drill hole re-establishing and rocky. Overall for the site vegetation has re-established, site considered successfully re-established (photo taken in 2019)



BH7600 (drilled in 2008). Very small section around drill hole re-establishing and rocky. Overall for the site vegetation has re-established, site considered successfully re-established (photo taken in 2019)



BH7856 (drilled in 2010, 2011 and 2012). Vegetation has successfully re-established (photo taken in 2019)



BH8062 (drilled in 2012). Small area still needing further re-establishment. Overall for the site vegetation has re-established, site considered successfully re-established (photo taken in 2019)



BH8063 (drilled in 2013 and 2014). Small area still needing further re-establishment. Less sparse than pre-drilling baseline. Vegetation considered to have successfully re-established (photo taken in 2019)



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GLOBAL ENVIRONMENTAL
SOLUTIONS

PHOTOGRAPHS OF DECOMMISSIONED DRILLED SITES

Date: June 2019

Scale: N.T.S

Project No.

710.09003.00139

8.1.1 Geology

Geologically, the prospecting right area is located in the western Bushveld Complex.

The Bushveld Complex is vertically (or stratigraphically) subdivided into the basal Marginal Zone, Critical Zone, Middle Zone and Upper Zone. The Critical Zone contains various layers of chromitite, which are of economic interest for chrome and platinum group elements (PGE). The Critical Zone is subdivided into a Lower Group (LG1 to LG7 Chromitite Layers), Middle Group (MG1 to MG4 Chromitite Layers) and an Upper Group (UG1 to UG3 Chromitite Layers). The PGE-carrying Merensky Pyroxenite, which only contains minor chromitite stringers, is developed above the Upper Group Chromitite Layers. During prospecting, Impala targeted the Merensky and UG2 reefs in order to evaluate the potential for future exploitation of platinum group metals (PGMs). These reefs are located in the Rustenburg Layered Suite of the Critical Zone. The Merensky Reef is about 2 500 m below surface in the eastern parts of the area, with the UG2 Reef about 80 m deeper (Metago, 2008).

Given the non-invasive nature of exploration drilling (when compared to mining), the geology baseline is expected to be in its pre-project state.

8.1.2 Topography

The area comprises gently undulating plains with low slope gradients. The altitude in the project area varies from 1 100 meters above mean seal level (mamsl) to 1 080 mamsl. There are several small koppies on the farm; the highest of which lies at an altitude of 1 106.8 mamsl. The area is approximately 52.4 km north west of the highest peak of the Magaliesberg Range (Nooitgedacht), which is at 1853 mamsl (Metago, 2008).

In the broader area, the topography has been influenced by mining activities. The topography of the prospecting right area itself has been influenced by human and livestock activity, with evidence of erosion and compaction of soils not attributable to prospecting activities.

8.1.3 Climate

The area has a semi-arid climate, with summer rainfall (averaging 730 mm per annum over the last five years) and temperatures of more than 35°C during the day time. The winters are dry with mild temperatures and occasional frost (Impala Platinum Limited, 2019).

The prospecting area falls within the Highveld Climatic Zone 85 % of the mean annual precipitation falls during summer as thunderstorms. The thunderstorms generally occur every 3 to 4 days in summer and are of short duration and high intensity. Temperatures in this climatic zone are generally mild, but low minima can be experienced in winter due to clear night skies. Generally, winds are light, but south-westerly winds associated with thunderstorms are typically strong and gusty (Metago, 2007 in SLR Consulting, 2016).

Rainfall and temperature affect the rate at which vegetation can recover. In previous years, contributing factors to impacting effective re-establishment at the sites included prevailing climatic conditions (high temperatures and below average rainfall) (SLR Consulting, 2018).

8.1.4 Soils and Land capability

Much of the prospecting area is dominated by Arcadia “black turf” soils which are dark, strongly structured, usually calcareous, clayey soils. More red sandy type soils occur in the southern parts of the prospecting right area. Minor rocky outcrops also occur in the south eastern corner of the prospecting right area.

There is no real difference between the topsoil and subsoil layers. The shrink-swell nature of the soils means that within a short time, natural mixing of horizons will take place. In profile the soils have a relatively homogenous texture and structure from the surface downwards (Metago, 2008).

8.1.5 Biodiversity

The area is located in open veldt and falls within the Savanna Biome, specifically the Zeerust Thornveld and Central Sandy Bushveld. There is the potential for red data species and protected species to occur in the area and the Central Sandy Bushveld has high conservation significance. The land on and surrounding the prospecting right is used for grazing purposes.

There are several small koppies on the property. Koppies are usually known biodiversity 'hotspots', rich in species diversity. Prospecting did not take place near the koppies (Metago, 2008).

8.1.6 Surface water

The prospecting right area falls within the Crocodile (West) Marico Water Management Area (WMA) and is within the A22F quaternary catchment. A non-perennial tributary crosses through the south eastern corner of the prospecting right area and feeds into the non-perennial drainage line (Molapongwamongana). Flows only occur during times of fairly high rainfall. Drainage lines are considered to be sensitive ecological environments; no drilling took place within 100m of any drainage lines (Metago, 2008).

The non-perennial drainage line ultimately feeds into the Elands River. The Elands River flows in an easterly direction, across the northern part of the survey area. The Elands River ultimately feeds into the Crocodile River (Metago, 2008).

Given the non-perennial nature of watercourses, there is no third-party reliance on surface water.

8.1.7 Groundwater

The prospecting right area is underlain by two aquifers; a shallow weathered aquifer underlain by deeper fractured aquifers. The deeper fractured aquifers might show different characteristics due to potential preferred pathways along dykes and geological contacts. The groundwater levels in the shallow weathered aquifer vary between 3.7 and 19.3 mbgl with an average depth of 6.8 mbgl. The groundwater level for the deeper fractured aquifer varies between 9.3 and 48.6 mbgl with an average depth of 21.8 mbgl (SLR Consulting, 2016).

In the broader area, groundwater quality is generally marginal to poor due to elevated nitrate concentrations from surrounding mining activities. Third party water users rely on groundwater for domestic, irrigation or livestock watering. Use of groundwater for domestic purposes is generally limited because communities have access to reticulated water supply (SLR Consulting, 2016).

8.1.8 Air Quality

The surrounding ambient air quality has been influenced by neighbouring mines, household fuel combustion and vehicle tailpipe emissions. Given the extent to which vegetation has re-established at drill sites, it is not expected that dust generated from exposed soils would influence the air quality baseline.

8.1.9 Noise

The prospecting area is located in open veldt and the surrounding land is used for grazing and farming purposes and in this regard livestock, birds and human voices have been identified as the main sources of sound in the prospecting right area. In terms of the broader area, the prospecting area falls within a predominantly well-developed area due to the substantial mining activities. The R556 road between Pretoria and Sun City runs to the north and east of the prospecting area and the R510 road between Rustenburg and Thabazimbi runs to the south of the prospecting area.

8.1.10 Visual Aspects

Drilled holes are demarcated by a cement beacon and/or an upright standpipe. This is not visible to the surrounding communities.

This is not expected to materially alter the visual landscape which has already been influenced by the nearby mine operations, development of the rural community, its support infrastructure (powerlines, roads etc.) and grazing activities.

8.1.11 Heritage/Cultural and Palaeontological Resources

There are no known heritage sites within the prospecting area (Metago, 2008).

In the broader area there is the Thaba-eba Nape range of mountains which is part of a cultural landscape and as such a sensitive archaeological region. There are also hundreds of stone walled settlements which date from the Late Iron Age which are associated with the ancestral Tswana, particularly the Bafokeng whose descendants today still occupy numerous towns in the region. There are also informal and formal graves in the adjacent property to the north (Metago, 2008).

8.1.12 Socio-economic and Current Land Uses

Landownership

Land ownership details within and immediately adjacent to the prospecting right area are provided in the table below. This section should be read with reference to Figure 4 which shows the below farms location relative to the prospecting right area.

The surface rights are mainly owned by the South African government, the Republic of Bophuthatswana and private individuals.

TABLE 8-1: LANDOWNERSHIP WITHIN AND IMMEDIATELY ADJACENT TO THE KLIPGATKOP PROSPECTING RIGHT AREA

Portion	Landowner
Klipgatkop 115 JQ (Prospecting Right Area)	
Portion 0	Republic of South Africa
Portion 1	Republic of Bophuthatswana
Roodekraalspruit 113 JQ (Adjacent, to the north of Klipgatkop 115 JQ)	
Portion 0	Private landowners – 42 listed individuals
Portion 5	Republic of South Africa
Diepkuil 116-JQ (Adjacent, to the east of Klipgatkop 115 JQ)	
Portion 0	Republic of Bophuthatswana
Welbekend 117 JQ (Adjacent, to the south of Klipgatkop 115 JQ)	
Portion 0	Republic of Bophuthatswana
Toulon 111 JQ (Adjacent, to the west of Klipgatkop 115 JQ)	
Portion 0	Republic of Bophuthatswana

Land Claims

The Department of Rural Development and Land Reform: Land Claims Commissioner was contacted on 16 May 2019 to confirm if any land claims have been lodged on the farms within the prospecting right. A response is still pending. There are no known land claims for area covered by the prospecting right. Proof of correspondence is included in Appendix C.

Land uses

The prospecting right area covers Remaining Extent and Portion 1 of the farm Klipgatkop 115 JQ. The area is rural in nature with villages scattered across the landscape. There are no communities that reside within the prospecting right area. In the adjacent property to the east there is the Diepkuil community and in the adjacent property to the north there is the Maile community. Main land uses in the broader area is a mixture of agriculture, community/suburban, mining activities and wilderness. Socio-economically, educational levels in the broader area are relatively low with a high level of unemployment. The high economic dependency on subsistence scale agriculture has resulted in over-grazing of veld in the area. This has likely influenced the rate at which vegetation has re-established at the remaining drill sites and the current status of the rehabilitated areas.

8.1.13 Description of specific environmental features and infrastructure on the site

The environmental features and infrastructure in the broader prospecting right area is described above. In summary:

- The area comprises gently undulating plains with low slope gradients.
- Visually, the landscape has been influenced by subsistence farming activities.
- There is evidence of cattle presence and grazing on site

8.1.14 Environment and current land use map

A conceptual map showing topographical information as well as land uses on and immediately surrounding the prospecting site is provided in Figure 4

8.2 ENVIRONMENTAL IMPACTS AND RISKS

8.2.1 Risk assessment Summary

The potential impacts/risks have been assessed against the prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. Given that decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed, this assessment focusses on potential residual impacts/risks as a result of the rehabilitation phase only. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr, therefore the assessment of the mitigated scenario is where additional mitigation measures are deemed necessary. The table below provides a summary of the potential impacts in no particular order of importance. A detailed description of the risk assessment is contained in Section 8.2.5.

Aspect	Potential impact	Reference to mitigation measures	Significance (takes into account measures implemented as per approved EMPr)	
			Unmitigated	Mitigated
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Not Applicable
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable

8.2.2 Assessment Criteria

Both the criteria used to assess the impacts/risks and the method of determining the significance of the impacts/risks is outlined in Appendix D.

8.2.3 Description of the process undertaken to identify impacts

Biophysical and socio-economic impacts associated with the proposed project were identified through a site visit undertaken by SLR.

As part of the public participation process, I&APs and commenting authorities (see Section 15) were provided with opportunities to provide input into the Closure process and comment on the proposed project, including the identification of environmental and socio-economic impacts.

8.2.4 Final Prospecting EMP Performance Assessment

A final EMP performance assessment was undertaken by SLR to inform the closure of the prospecting right

A site visit was conducted on 24 April 2019. Photographs of the site were taken at the prospecting sites and the general area around the boreholes (Figure 5). This Final Prospecting EMP Performance Assessment was informed by the following:

- Previous Prospecting EMP Performance Assessments.
- Previous Impala prospecting reports.
- Review of available photographs (2013, 2015 and 2017) of the drill sites.
- Observations from walking/driving through the prospecting right area.

Based on the above, the following findings are noted for the final EMP performance assessment:

- There are currently no drilling activities taking place on site. Eight drill sites were completed during the prospecting period.
- During the April 2019 site visit, no clear distinction could be seen between the areas that had been drilled and the surrounding area. There was evidence of cattle across the prospecting area.
- There has been overgrazing and proliferation of invasive species on the site as well as some soil exposure, though this is not unique to the drill sites and is across the farm. It is likely that the overgrazing in the Klipgatkop prospecting right area hampers the ability of vegetation to fully recover at the drill sites.
- A short summary of the status of each drill site is provided below:
 - Drill site BH7025, BH7856: The vegetation has re-established well. There is presence of invasive species. The vegetation has re-established to a satisfactory level and no additional monitoring is deemed necessary.
 - Drill site BH7599, BH7600: The vegetation has re-established well. A small area around the drill hole is still not vegetated completely and has exposed soil and rock. There is presence of invasive species. The vegetation has re-established to a satisfactory level and no additional monitoring is deemed necessary.
 - Drill site BH7608 and BH7799: These areas could not be accessed as it was overgrown. Considering the area is overgrown and cannot be accessed, it is assumed that the vegetation has re-established well, and at the very least similar to the other drill sites. No additional mitigation or monitoring is deemed necessary.
 - Drill site BH8062 and BH8063: In the most recent Prospecting EMP Performance Assessment (SLR, November 2017) it was recommended that monitoring of the drill site be undertaken until such time as vegetation has re-established to a satisfactory level. During the most recent site visit in April 2019, vegetation was seen to have re-established well. There are still some small patches that need to be further established, though there has been a marked improvement compared to what was seen in the 2015 and 2017 site photographs taken. There is presence of invasive species. The general area around the property looks similar to this prospecting site i.e. the presence of exposed soil; it is likely that the overgrazing in the Klipgatkop prospecting right area hampers the ability of vegetation to fully recover at the drill site. BH8063 also seems less sparse now compared to the pre-

drilling baseline; the 2013 pre-drilling photograph shows that the area in general was very sparse with much soil exposure. The vegetation is thus considered to have re-established to a satisfactory level and no additional mitigation or monitoring is deemed necessary.

○ *Summary:*

- Drill sites where mitigation/ monitoring required: 0
- Drill sites re-established to a satisfactory level: 6 (BH7025, BH7599, BH7600, BH7856, BH8062 and BH8063)
- Drill sites assumed to have re-established to a satisfactory level: 2 (BH7799 and BH7608)

The detailed assessment procedure is described in detail in Appendix E.

8.2.5 Detailed assessment of potential impacts

Decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed (as outlined in Section 10.1). This assessment therefore focusses on potential residual impacts/risks as a result of the rehabilitation phase only. Potential environmental and socio-economic residual impacts/risks have been identified by SLR. The sequence in which these issues are listed are in no order of priority or importance. The criteria used to rate each impact is outlined in Appendix D.

The potential impacts/risks have been assessed against the prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMP. The mitigated scenario is where additional mitigation measures are deemed necessary.

Issue: Loss of flora and fauna through lack of or poor rehabilitation

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of flora and fauna at the drill site. This could cause a proliferation of alien invasive species and have edging effects on surrounding areas.

Assessment of impact

Vegetation and related habitat and faunal species have been influenced to varying degrees by livestock grazing. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). Rehabilitation activities have been undertaken at all drill sites, the sites have been cleared of waste and contaminated soils and the soils were prepared for re-vegetation. At the time of the 2019 site visit, for six of the drill sites (completed in/before 2011), vegetation had successfully re-established (BH7025, BH7599, BH7600, BH7856, BH7799, BH7608). For the remaining two drill sites (BH8062 and BH8063 completed in 2012 and 2014), re-vegetation was almost complete with a few small patches of exposed soil. However, the exposure of soil is seen throughout the surrounding area. The BH8063 drill hole area was more vegetated compared to pre-drilling conditions and thus is considered successfully re-established. Ongoing livestock activities e.g. over-grazing, have likely hampered the full re-establishment of vegetation at drill hole BH8062. The general area around the property looks similar to this prospecting site i.e. the presence of exposed soil; this area is thus considered successfully re-established.

The loss of flora and fauna through a lack of or poor rehabilitation is considered to be of **VERY LOW** significance even without mitigation (see table below). For all drill sites, vegetation is considered to have successfully re-established

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE 8-2: TABLE: IMPACT/RISK SUMMARY – FLORA AND FAUNA

Issue: Loss of flora and fauna through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-
Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing activities (overgrazing) within the drill site areas would contribute to cumulative impacts on the flora and fauna.	
Degree to which impact can be reversed	Over-time and with adequate rainfall and controlled livestock grazing, any potential impacts could be reversed.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

Issue: loss of pre-prospecting land uses through lack of or poor rehabilitation

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of pre-prospecting land uses. This could affect the livelihoods of communities who rely on the land for subsistence purposes. In addition, this could result in ongoing dust emissions from exposed areas which could cause a nuisance to surrounding land uses.

Assessment of impact

Land uses in the prospecting right area include livestock grazing. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). Rehabilitation activities have been undertaken at all drill sites, the sites have been cleared of waste and contaminated soils and the soils were prepared for re-vegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification. At the time of the 2019 site visit, for six of the drill sites (completed in/before 2011), vegetation had successfully re-established. For the remaining two drill sites (BH8062 and BH8063 completed in 2012 and 2014), re-vegetation was almost complete with a few small patches of exposed soil. However, the exposure of soil is seen throughout the surrounding area. The BH8063 was more vegetated compared to pre-drilling conditions and thus is considered successfully re-established. Ongoing livestock activities e.g. over-grazing, have likely hampered the full re-establishment of vegetation at BH8062. The general area around the property looks similar to this prospecting site i.e. the presence of exposed soil; this area is thus considered successfully re-established. With the re-vegetation of the drill sites, the pre-prospecting land uses on and surrounding the drill sites can continue. Mismanagement or overuse of the area e.g. over-grazing could hamper long term use of the land and result in ongoing exposed areas.

The loss of pre-prospecting land uses through a lack of or poor rehabilitation from prospecting activities is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE 8-3: IMPACT/RISK SUMMARY – LAND USE

Issue: Loss of pre-prospecting land use through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-
Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing activities (overgrazing) within the drill site areas would contribute to cumulative impacts on land uses.	
Degree to which impact can be reversed	With adequate rainfall and controlled livestock grazing, land uses could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

Issue: Change in the visual landscape of the area

Description of impact

A lack of or poor rehabilitation could alter the natural visual landscape and result in scaring.

Assessment of impact

The landscape is rural in nature and dominated by community land uses (such as livestock grazing and infrastructure such as a windmill and a cement water tank). Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site) and did not take place in close proximity to roads, houses or community activities (see Section 8.1). This has limited the potential change to and scaring of the landscape. Rehabilitation activities have been undertaken at all drill sites, the sites were cleared of any waste or contaminated soils and the soils prepared for revegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification. At the time of the 2019 site visit conducted, for six of the drill sites (completed in/before 2011), vegetation had successfully re-established. For the remaining two drill sites (BH8062 and BH8063 completed in 2012 and 2014), re-vegetation was almost complete with a few small patches of exposed soil. However, the exposure of soil is seen throughout the surrounding area. The BH8063 was more vegetated compared to pre-drilling conditions and thus is considered successfully re-established. Ongoing livestock activities e.g. over-grazing, have potentially hampered the full re-establishment of vegetation at BH8062. The general area around the property looks similar to this prospecting site i.e. the presence of exposed soil; this area is thus considered successfully re-established. With the revegetation of the drill sites, the visual landscape would return to a pre-prospecting state. Mismanagement or overuse of the area e.g. over-grazing could hamper long term visual landscape and result in ongoing exposed areas. During the April 2019 site visit, prospecting drill sites were not obvious in the landscape and no visible scaring was noted.

The change in the landscape is considered to be **INSIGNIFICANT** even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE 8-4: IMPACT/RISK SUMMARY – VISUAL LANDSCAPE

Issue: Change in the visual landscape of the area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	-
Duration	Very short term (VL)	-
Extent	A part of the site (VL)	-
Consequence	Very Low	-
Probability	Unlikely (VL)	-
Significance	Insignificant	-
Nature of cumulative impacts	Ongoing grazing activities within the drill site areas would contribute to cumulative impacts on landscape.	
Degree to which impact can be reversed	With adequate rainfall and controlled livestock grazing, the pre-prospecting landscape could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Not required.	
Residual impacts	None expected.	

Issue: Negative and positive socio-economic impacts

Description of impact

Closure of a prospecting right has the potential to result in both negative and positive socio-economic impacts. Where a third party applies for the mineral rights in the same area, related socio-economic impacts would occur.

Assessment of impact

Closure of the prospecting right would preclude Impala/RBRP joint venture from undertaking further prospecting activities, which would result in a loss of income for the appointed contractor. It is however assumed that a contractor in the normal course of business would find alternative contracts to continue his business. Where a contractor made use of local communities, the temporary and short-term employment opportunities would no longer exist. As the nature of prospecting activities is to determine the presence of exploitable mineral resources and is not associated with generating a revenue, social related benefits are thus not applicable. With Impala/RBRP joint venture abandoning and exiting from the prospecting project, the mineral resource becomes available for third party applications.

When considering the potential negative socio-economic impacts together with the opportunity that is created for third party applicants the overall impact is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE 8-5: IMPACT/RISK SUMMARY – SOCIO-ECONOMIC

Issue: Change in the visual landscape of the area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	-

Duration	Short term (L)	-
Extent	Affecting immediate neighbours (M)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	No cumulative impacts expected.	
Degree to which impact can be reversed	With adequate communication structures negative impacts can be controlled and positive impacts can be enhanced.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Possible.	
Residual impacts	None expected.	

9 PROGRESSIVE REHABILITATION UNDERTAKEN

Progressive rehabilitation took place as prospecting activities advanced. Rehabilitation commenced as each drill site was completed and decommissioned. Rehabilitation activities were aligned with RBRP/Impala JV's approved EMP and closure objectives, and included the activities outlined in Section 10.1.1 below.

A site visit was conducted on 24 April 2019 and it was noted that six of the drill sites had fully re-established (BH7025, BH7599, BH7600, BH7856, BH7799, and BH7608).

For drill site BH8063, while not completely re-established, the site seemed less sparse compared to the pre-drilling baseline; the 2013 pre-drilling photograph shows that the area in general was very sparse with much soil exposure. BH8063 is thus considered to have successfully re-established and no additional monitoring is deemed necessary.

Drill site BH8062 re-vegetation was still in progress as there were some small patches of exposed soils. The general area around the property looks similar to this prospecting site i.e. the presence of exposed soil; it is likely that the overgrazing in the Klipgatkop prospecting right area hampers the ability of vegetation to fully recover at the drill site. The vegetation is thus considered to have re-established to a satisfactory level and no additional monitoring is deemed necessary.

The final EMP Performance Assessment completed forms part of this submission. Further detail is included in the Final EMP Performance Assessment in Section 8.2.4.

10 METHODS TO DECOMMISSION PROSPECTING COMPONENTS AND STRATEGIES TO AVOID, MINIMIZE AND MANAGE RESIDUAL OR LATENT IMPACTS

10.1 DECOMMISSIONING AND REHABILITATION OF DISTURBED AREAS

Decommissioning and rehabilitation took place immediately after exploration work at each drill site was completed. This usually took between one and three days. Decommissioning and rehabilitation activities at each site included the following steps:

- Removal of all equipment, structures and materials;
- Removal of any waste and disposal at an appropriately permitted waste site;
- Sealing and capping of all drill holes and installation of a 0.8 x 0.8 x 0.8 m concrete block and standpipe for easy identification.
- Replacing and levelling topsoil (where removed);
- Scarifying/ripping areas where soils have been compacted; and
- Areas were left to naturally re-vegetate.

These steps were based on the regulatory requirements for rehabilitation of the prospecting sites as detailed in the approved EMPr (see Text box below for an outline of the rehabilitation commitments). It should be noted that at the time of compiling the prospecting EMP, the DMR's standard EMP format was relevant.

Rehabilitation commitments as detailed in the approved EMPr (dated 15 December 2008):

- *The environment affected by the mining/ prospecting operations shall be rehabilitated by the holder, as far as is practicable, to its natural state or to a predetermined and agreed to standard or land use which conforms with the concept of sustainable development. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof;*
- *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 fertilised (based on a soil analysis) 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 Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification;*
- *All infrastructure, equipment, plant, temporary housing and other items used during the mining period will be removed from the site (section 44 of the MPRDA);*
- *Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be permitted to be buried or burned on the site; and*
- *Final rehabilitation shall be completed within a period specified by the Regional Manager.*

10.2 STRATEGIES TO AVOID, MINIMIZE AND MANAGE RESIDUAL OR LATENT IMPACTS

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

11 LONG-TERM MANAGEMENT AND MAINTENANCE

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

12 PROPOSED CLOSURE COST AND FINANCIAL PROVISION

12.1 QUANTUM OF THE FINANCIAL PROVISION

Based on the final EMP performance assessment, the closure cost estimate below considers the following:

- There are currently no drilling activities taking place on site.
- Six drill sites have re-established to a satisfactory level (BH7025, BH7599, BH7600, BH7856, BH8062 and BH8063) and no further maintenance or aftercare activities are deemed necessary.
- Two drill sites (BH7799 and BH7608) are assumed to have re-established to a satisfactory level and no further maintenance or aftercare activities are deemed necessary.

Given that Impala on behalf of the Impala/RBRP Joint Venture is applying to close the prospecting right and no remaining boreholes will be drilled under the prospecting right, only the current closure liability has been included in this report.

No further maintenance or aftercare activities are deemed necessary; thus, the closure and rehabilitation costs are R0.00.

Impala submitted on behalf of the RBRP/Impala JV a financial guarantee of R50 000 to the DMR for this prospecting right in 2005 (Guarantee Number: G0657/319290/GLO; 26 October 2005). The updated final financial provision is calculated at R 0.00. Where the DMR agrees that the above is appropriate, the existing financial guarantee of R50 000 should be cancelled.

12.2 CONFIRMATION THAT THE FINANCIAL PROVISION WILL BE PROVIDED

An existing financial guarantee is in place. Where the DMR agrees that the above is appropriate, the existing financial guarantee of R50 000 should be cancelled (see Section 12.1 above).

13 FINAL AND FUTURE LAND USE

A plan showing the area under closure including the final and future land use is presented in Figure 4.

14 ASSUMPTIONS, UNCERTAINTIES, LIMITATIONS AND GAPS IN KNOWLEDGE

This Closure Plan relies on SLR's professional opinion which has been informed by the following:

- Previous EMP Performance Assessments;
- Previous Financial Provision reports;
- Prospecting reports;
- Photographs taken in 2013, 2015 and 2017; and
- A Site visit in 2019.

It is assumed that revegetation will be continuing where rainfall patterns continue and over grazing is controlled.

The Risk Assessment focuses on third parties only and does not assess health and safety impacts on employees and contractors because the assumption is made that these aspects are separately regulated by health and safety legislation, policies and standards, and that Impala/RBRP joint venture will adhere to these.

15 CONSULTATION RECORD

15.1 DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED

This section describes the public participation process undertaken for the Closure Plan.

15.2 PUBLIC PARTICIPATION PROCESS UNDERTAKEN TO DATE

A public participation process is being undertaken to inform the Closure Plan in accordance with the consultation requirements under the MPRDA. A record of the public participation process undertaken is outlined in Table 15-1 below. The purpose of the public participation process was to notify landowners, land users and other key stakeholders of the proposed project and to provide them with opportunity to raise any initial issues or concerns regarding the proposed project.

Supporting documentation is presented in Appendix C.

TABLE 15-1: PUBLIC PARTICIPATION PROCESS UNDERTAKEN AS PART OF THE CLOSURE PLAN

Steps	Details
DMR Pre-application meeting	<p>A pre-application meeting was held with the DMR in Klerksdorp on 10 May 2019. The purpose of the meeting was:</p> <ul style="list-style-type: none"> - To provide information pertaining to the project - To outline the motivation for the proposed closure - To provide an overview of the environmental process relevant to the project - To provide an overview of the existing status of the environment - To outline and obtain input on the potential environmental/cultural impacts - To outline and obtain input on the planned public participation process. <p>A copy of the pre-application meeting minutes is included in Appendix C</p>
Focused Meeting with RBA	<p>A meeting was held with the Royal Bafokeng Administration on 20 April 2019. The purpose of the meeting was:</p> <ul style="list-style-type: none"> - To provide information pertaining to the project - To outline the motivation for the proposed closure - To provide an overview of the environmental process relevant to the project - To provide an overview of the existing status of the environment - To outline the potential environmental/cultural impacts - To outline and obtain input on the planned public participation process. <p>A copy of the meeting minutes is included in Appendix C.</p>
Meeting with Land User	<p>A meeting was held with the Klipgatkop land user, Ben Rangaka, on 15 May 2019. The purpose of the meeting was to provide him with the BID and record any comments he had for the project.</p>
Notification of the land claims commissioner	<p>The land claims commissioner was consulted in order to verify the status of land claims on the farm Klipgatkop 115 JQ. The proof of correspondence is included in Appendix C</p>
I&AP database	<p>A database was compiled with input from the Impala stakeholder engagement team and is updated on an on-going basis for the duration of the project. The project database identified and included landowners, land users and lawful occupiers within the prospecting right area, as well as those immediately adjacent to the projecting right area. In addition, the project database included surrounding I&APs and regulatory authorities. All stakeholders registered on the project database received a copy of the Background Information Document (BID), and SMS notification of the proposed project and are being notified that the Closure Plan Report is available for public and regulatory authority review and comment. Landowner, land user, commenting authorities and other I&AP details were verified through a deedsearch and/or telephonic discussions. A copy of the project database is included in Appendix C</p>
Background Information Document (BID)	<p>A BID (in English and Setswana) was compiled by SLR and distributed to I&APs and commenting authorities registered on the project database. In addition, copies of the BID were made available at the Roodekraal Community Hall. The BID provided:</p> <ul style="list-style-type: none"> - Information about the proposed prospecting right closure. - Information about the baseline environment of the prospecting right area

	<ul style="list-style-type: none"> - Information about the environmental assessment process (Basic Assessment Process). - Information regarding possible environmental/cultural impacts. - Information on how I&APs and commenting authorities can have input into the environmental assessment process. <p>A registration and response form was attached to the BID, which provided I&APs with an opportunity to register as an I&AP and submit comments on the proposed project. Copies of the BID in English and Setswana are included in Appendix C</p>
Site notices	SLR placed laminated site notices (in English and Setswana) on the fence along the R556, along the boundary fence of the prospecting right areas as well as the in Roodekraalspruit Maile village area. Photographic proof is included in Appendix C. A map illustrating the location of the site notices is also included in Appendix C
Newspaper advertisements	A block advertisement was placed in the Rustenburg Herald newspaper on 15 May 2019. A copy of the advertisement is included in Appendix C
Draft Closure Report	The draft Closure Plan Report was distributed for a 30-day comment period from 10 July 2019 to 12 August 2019 in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the closure process.
Site visit	The Rustenburg Local Municipality requested a site visit which was held on 7 August 2019. A copy of the site visit record is included in Appendix C.

Approximately fourteen written submissions were received from I&APs during the public participation process (see in Appendix C)

In addition, Impala has also engaged directly with the Mofoko and Mosito families. Proof of this consultation (letter) has been included in Appendix C.

TABLE 15-2: I&APS THAT SUBMITTED WRITTEN/TELEPHONIC CORRESPONDENCE DURING THE PROCESS

State Departments and Organs of State	Traditional leadership
Natasha Higgitt (SAHRA)	Roodekraalspruit Maile Kgosana and Executive Committee
Chris Tshisevhe (DMR)	Land Claim Commissioner
C. Theunissen (DWS)	L.J. Bogatu
Land user on Klipgatkop 115 JQ	General I&APs
Ben Rangaka	Malebabo Tsolo
Federation for A Sustainable Environment	Phenyo Matabane
Mariette Liefferink	

15.3 REVIEW OF THE CLOSURE PLAN

The Closure Plan Report has been made available for commenting authority and I&AP review and comment for 30 days. Summaries of the Closure Plan (in English and Setswana) have been made available to all I&APs registered on the I&AP database (via email) and hard copies of the summary document are available at the Roodekraal Community Hall, the Rustenburg Public Library and the Royal Bafokeng Civic Centre. A hard copy of the report has been made available at the Roodekraal Community Hall, the Rustenburg Public Library and the Royal Bafokeng Civic Centre. In addition, I&APs have been notified that the Closure Plan Report and/or summary is available for review via SMS. An electronic copy has also been made available on the SLR website.

Commenting authorities will receive an electronic copy or a hard copy of the Closure Plan Report.

15.4 COMPLETION OF THE CLOSURE PLAN

Following closure of the Closure Plan Report commenting period, all comments received will be incorporated and responded to in a Comments and Responses Report. Where required the Closure Plan will be updated to address comments received. The final report including I&AP comments will be submitted to DMR for consideration and decision-making. Registered I&APs will receive notification of the final submission to the DMR.

After the DMR has reached a decision registered I&APs will be notified of the outcome of the application, the reasons for the decision and details of the appeal process.

15.5 SUMMARY OF ISSUES RAISED BY I&APS

All written comments received have been collated and responded to in a Comments and Responses Report (see Table 15-3 below).

In summary, issues raised related mainly to:

- Lack of community initiatives by Impala
- Disruption of the current water system from drilled boreholes
- Cracking of houses
- Wanting access to the prospecting results;
- Clarification of reasons for the closure and what happens after the prospecting right has been closed;
- Closure plan requirements;
- Financial provisions;
- Public participation conducted.

TABLE 15-3: SUMMARY OF ISSUES RAISED BY I&APS

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
Regulatory Department				
Department of Mineral Resources (DMR)				
Chris Tshisevhe	16 May 2019 (email)	<p>Your e-mail and its attachment are hereby acknowledged.</p> <p>In order for this office to effectively evaluate you proposed closure of prospecting rights, you are hereby requested to complete an application form (DME 270) for a closure certificated which must be accompanied by necessary closure supporting reports.</p> <p>Should you have any query regarding the content of this e-mail kindly contact Mr Christopher Tshisevhe on 071 475 8362 as soon as possible. A copy of DME 270 has been attached for your information.</p>	The required form and the necessary supporting documents form part of this report.	Refer to Appendix C
Neo Kgokong	23 May 2019 (email)	<ol style="list-style-type: none"> 1. You do not need to apply for an EA for decommissioning, a closure certificate application and supporting documents will suffice. 2. Because of the above, you do not need to compile a BAR, but a final performance assessment report on the approved EMP is required. <p>I hope that is covered, basically the closure process is as it has been in terms of the MPRDA.</p>	<ol style="list-style-type: none"> 1. It is SLR’s understanding that the provisions of section 24F of NEMA apply. In this regard, any listed activity in listing notice 1 triggered by the project requires that a basic assessment process be followed. NEMA defines "decommissioning" as follows: "... or closure of a facility to the extent that it cannot be readily re-commissioned". Based on this, Activity 22 of Listing Notice 1 (see activity description below) is triggered as a closure certificate is required in terms of Section 43 of the MPRDA for closure of a Prospecting Right. <p><i>Activity 22 of Listing Notice 1 (GNR 983)</i> The decommissioning of any activity requiring – (i) a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); but excluding the decommissioning of an activity relating to the secondary processing of a – (a) mineral resource, including the smelting,</p>	1. Table 3-1

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
			<p>beneficiation, reduction, refining, calcining or gasification of the mineral resource; or (b) petroleum resource, including the refining of gas, beneficiation, oil or petroleum products; – in which case activity 31 in this Notice applies.</p> <p>2. A final performance assessment / environmental audit was conducted, and the details have been included in this report as well as the separate MPRDA Closure Plan Report submitted.</p>	<p>2. Section 8.2</p>
South African Heritage Resources Agency (SAHRA)				
Natasha Higgitt	15 May 2019 (email)	<p>Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.</p> <p>Please create an application on SAHRIS and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA.</p> <p>Once all documents including all appendices are uploaded to the case application, please ensure that the status of the case is changed from DRAFT to SUBMITTED. Please ensure that all documents produced as part of the EA process are submitted as part of the application, and are submitted to SAHRA at the beginning of the Public Review periods. Once all these documents have been uploaded, I will be able to issue an informed comment as per section 38(4) and 38(8) of the NHRA.</p>	A case was opened on the SAHRIS website and the applicable documentation was uploaded.	Refer to Appendix C
Natasha Higgitt	10 June 2019 (email/SAHRIS)	Thank you for notifying SAHRA of the Environmental Authorisation (EA) and Closure of a Prospecting Right on Klipgatkop 115 JQ near Rustenburg, Rustenburg Local Municipality and the Bojanala Platinum District Municipality in	A Letter of Recommendation for Exemption has been provided by the heritage specialist Dr. Julius Pistorius.	Refer to Appendix F

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>the North West Province (NW30/5/1/1/2/519 (10368) PR). As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component, palaeontological component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations. The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see www.asapa.co.za or www.aphp.org.za to provide an Archaeological Impact Assessment (AIA). The AIA must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments. The Minimum Standards make reference to a Letter of Recommendation for Exemption from further studies that the appointed specialist may submit, should they feel that it is appropriate. No further assessment of palaeontological resources is required as the development footprint is located within an area of insignificant sensitivity as per the SAHRIS PalaeoSensitivity map. Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as maritime archaeology, built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p> <p>The draft BAR with appendices must be submitted to the SAHRIS application at the beginning of the Public Review period so that informed comments may be issued.</p>		

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
Natasha Higgitt	05 August 2019 (SAHRIS)	<p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p> <ul style="list-style-type: none"> • 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed closure; • 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. No specific conditions are provided for the development; • 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule; • 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule; • 38(4)d – See section 51(1) of the NHRA; • 38(4)e – The following conditions apply with regards to the appointment of specialists: <ul style="list-style-type: none"> ○ i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the 	<p>These requirements have been included in the BAR (submitted as a separate report). The final BAR and Closure Plan Report will be uploaded to the SAHRIS website.</p>	<p>Refer to Appendix C</p>

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;</p> <ul style="list-style-type: none"> The Final BAR and EMPr must be submitted to SAHRA for record purposes; <p>The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.</p>		
Department of Water and Sanitation				
C. Theunissen	17 May 2019 (email)	<p>Impala Platinum Ltd & Royal Bafokeng Resources Platinum (Pty) Ltd Unincorporated Joint Venture (Impala/RBRP Joint Venture) ptn 1, Klipgatkop 115 JQ NW 30/5/1/1/2/519 (10368 PR).</p> <p>This office acknowledges the receipt of your documents regards to the above-mentioned on 17 May 2019 (Task T231/2019). The office responsible for this area is: Ms Sebenzile Ntshangase and can be contacted at (012) 253-1026. Comments would be forwarded in due time.</p>	Not applicable	Refer to Appendix C
Regional Land Claims Commissioner				
L.J. Bogatu	11 July 2019 (email)	<p>Land Claim enquiry: Remaining extent and portion 1 of the farm Klipgatkop 115 JQ</p> <p>I acknowledge receipt of your letter dated the 10 July 2019 regarding the above-mentioned matter. Kindly note that a formal response could be expected from our office within the next 7 (seven) working days.</p> <p>Should you however require additional information, you can contact Ms. K.W. Mothupi.</p>	Not applicable	Refer to Appendix C
L.J. Bogatu	29 July 2019 (email)	<p>Remaining extent and portion 1 of the farm Klipgatkop.</p> <p>We confirm that as at the date of this letter no land claim appears on our database in respect to the above property. This includes the database for claims lodged by 31 December 1998; and those lodged between 1 July 2014 and 27 July 2016 in terms of the Restitution of Land Rights Amendment Act,</p>	Not applicable	Refer to Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>2014.</p> <p>Whilst the commissioner takes reasonable care to ensure the accuracy of the information it provides, there are various factors that are beyond the Commissioner's control, particularly relating to claims that have been lodged but not yet gazetted such as:</p> <ol style="list-style-type: none"> 1. Some Claimants referred to properties they claim dispossession of rights in land against using historical property descriptions which may not match the current property description. 2. Some land claimants provide the geographic descriptions of the land they claim without mentioning the particular actual property description they claim dispossession of rights against the land. <p>The Commission therefore does not accept any liability whatsoever if through the process further investigation of claims it is found that there is in fact a land claim in respect of the above property. If you are aware of any change in the description of the above property after 19 June 1913 kindly supply us with such description so as to enable us to do further research.</p>		
Rural, Environment and Agricultural Development				
Ellis Thebe	11 July 2019 (email)	<p>Prospecting right Klipgatkop 115 JQ JQ Royal Bafokeng Resources Platinum in North West Province.</p> <p>The department have received the request to comment on the prospecting right Doornspruit 84 JQ on 09 July 2019. Please note the request has been assigned to Ms Queen Imasiku.</p> <p>The file reference number is NWP/DMR/44/2019.</p>	Not applicable	Refer to Appendix C
Rustenburg Local Municipality				
Kelebogile Mekgoe	07 August 2019 (site inspection)	<p>A site visit was held with Kelebogile Mekgoe.</p> <p>Following the Rustenburg Local Municipality site-inspection on 07 August 2019, the municipality requested an extension of up to 15 August 2019 to draft and send their comments.</p>	Not applicable	Refer to Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
Royal Bafokeng Administration				
Royal Bafokeng Administration	20 April 2018 (focused meeting)	The RBA will forward the presentation and the information through to their councillors. If an additional meeting is required by either the councillors or the land claimants, SLR will make proper arrangements to accommodate these.	Not Applicable.	Refer to Appendix C
Land User				
Ben Rangaka (Klipgatkop)	10 May 2019 (telephone) 15 May 2019 (in person discussion)	<ol style="list-style-type: none"> Lack of community initiatives by Impala Disruption of the current water system from drilled boreholes (less water). Cracking of houses 	<ol style="list-style-type: none"> As the nature of prospecting activities is to determine the presence of exploitable mineral resources and is not associated with generating revenue, social related benefits are not applicable. Impala started to drill on Klipgatkop before Mr Rangaka started to rent the property. The Klipgatkop farm does not have a strong underground water reservoir and this was the case prior to any exploration drilling by Impala. Impala constructed a water pipeline from the 14 Shaft operation to the Klipgatkop farm and are currently providing water for the cattle. (Response from Impala). Prospecting activities ended in 2014 on the prospecting site. There are also no houses present on the prospecting site property. Prospecting activities would not affect houses or cause cracking. 	Refer to Appendix C
	27 May 2019 (email)	Our borehole water has dried up since the mine started drilling in our environment- how will we be assisted regarding this impact?	Impala started to drill on Klipgatkop before Mr Rangaka started to rent the property. The Klipgatkop farm does not have a strong underground water reservoir and this was the case prior to any exploration drilling by Impala. Impala constructed a water pipeline from the 14 Shaft operation to the Klipgatkop farm and are currently providing water for the cattle. (Response from Impala).	
General I&APs				
Malebabo Tsolo (Environmental Manager, Bafokeng Platinum)	17 May 2019 (email)	Could you please register me as an interested party for the application for Closure of the Klipgatkop 115 JQ prospecting right?	Confirmation was provided to Malebabo Tsolo that her details were added to the database.	Refer to Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
Phenyo Matabane	22 May 2019 (email)	Please may you send us the documentation via email for the below.	The BID was sent to Mr. Matabane.	Refer to Appendix C
Roodekraalspruit Maile Kgosana and Executive Committee				
Jack Mataboge	25 April 2019 (focused meeting)	What happens after the prospecting right has been closed?	The mineral resource becomes available for third party applications.	Refer to Appendix D
Keorapetse Mosito	25 April 2019 (focused meeting)	What led to the abandoning of this project?	<p>Impala has faced tremendous economic and financial challenges throughout the last few years.</p> <p>As a result, thereof, Impala undertook a strategic review of its Impala Rustenburg Operation, and assessed the outlook going forward, particularly in response to the prevailing market conditions. The review included the Roodekraalspruit, Doornspruit, Klipgatkop and Diepkuil Joint Venture projects, adjacent to the Impala Rustenburg Operation.</p> <p>To this effect a joint decision was made by the Impala Platinum Ltd / Royal Bafokeng Resources Platinum Unincorporated Joint Venture not to proceed with the Joint Venture. The Joint Venture project area was originally secured as certain potential future shafts (for example 18 shaft) at Impala would have exploited some of the mineral resources underlain by this Joint Venture project area. Effectively all plans to develop such new mining infrastructure have been shelved by Impala. (Response from Impala).</p>	Refer to Section 5.3
Keorapetse Mosito	25 April 2019 (focused meeting)	No one gave us feedback regarding what they found there. Is the information obtained by Impala during the PR surveys freely available?	From the current drilling done, it appears as if the general geology will be typical to the geology of the western Bushveld Complex in the existing and surrounding shafts of Impala. Results from the drilling program to date confirmed the presence of the Merensky and UG2 Reefs within the prospecting right area. Drilling information can be obtained from the Geological Council of South Africa. (Response from Impala).	Refer to Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
Keorapetse Mosito	25 April 2019 (focused meeting)	Is it possible for any company to open a shaft if the depth of the resource is not an issue to them?	Under the prevailing economic climate and metal prices it would be difficult for any company to open a shaft due to the depth of the reef horizons and the high temperature of the virgin rock at these depths. Refrigeration cooling would be required at a very high cost. (Response from Impala).	Refer to Appendix C
Federation for A Sustainable Environment				
Mariette Liefferink.	13 August 2019 (email)	<p>The following comments are submitted on behalf of the Federation for Sustainable Environment (FSE). The FSE is a federation of community based civil society organisations committed to the realisation of the constitutional right to an environment that is not harmful to health or well-being, and to having the environment sustainably managed and protected for future generations. Their mission is specifically focussed on addressing the adverse impacts of mining and industrial activities on the lives and livelihoods of vulnerable and disadvantaged communities who live and work near South Africa's mines and industries.</p> <p>We respectfully request permission to submit our comments one day after the time for comment prescribed.</p> <p>From a reading of the above-mentioned Background Information Documents (BAR), we infer that:</p> <ul style="list-style-type: none"> • 14 exploration drill holes and 8 exploration drill holes were drilled in terms of the Doornspruit and Roodekraalspruit and Klipgatkop Prospecting Rights respectively; • The applications for closure are in terms of section 43(3) of the Mineral and Petroleum Resources Development Act (28 of 2002); • The applications for closure are motivated by the fact that Impala faces tremendous economic and financial challenges; • The potential impacts of the closure applications on flora and fauna and land-use are minimal and the socio-economic and visual impacts were also assessed as minimal. 	At the end of the review period (12 August 2019), the draft documents on the website automatically expired and were no longer available. The final version of the report (including comments made during the review period) will be made available on the SLR website for viewing. The FSE will be notified and provided a link to the SLR website.	Refer to Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<ul style="list-style-type: none"> No additional mitigation or monitoring is deemed necessary for the above-mentioned impacts. <p>We were unsuccessful in accessing the copies of the full reports of the above-mentioned applications on the SLR website this morning, that is, the 13th of August, 2019 hence our comments are grounded upon the summaries of the Basic Assessment and Environmental Management Programme and Closure Plan and are generic.</p> <p>Firstly, according to the South African Human Rights Commission’s (SAHRC) findings and directives pursuant to its National Hearing on the Underlying Socio-Economic Challenges of Mining Affected Communities in South Africa, the Applicant should solicit the community’s consent, and “the community shall decide whether to grant its consent in terms of the community’s customary law and practices, provide that such process shall be transparent, democratic and participatory.” From a reading of the Comments and Response Reports we noticed that comments of only 3 or 4 community members are recorded. We infer from the comments of the community members that there was inadequate closure preparation (which should have commenced at the start of the prospecting operations) and that the perceptions and expectation of the community members were not adequately managed during the prospecting operations. To exemplify:</p> <ul style="list-style-type: none"> <i>What happens after the prospecting right has been closed?</i> <i>What led to the abandoning of this project?</i> <i>No one gave us feedback regarding what they found there. Is the information obtained by Impala during the PR surveys freely available?</i> <i>Is it possible for any company to open a shaft if the depth of the resource is not an issue to them?</i> <i>Who gave Impala the right to prospect and drill holes in our properties?</i> <i>According to the Rehabilitation process, who accepted the Rehabilitation process on behalf of my</i> 	<p>The public participation process was undertaken in accordance with the requirements of Chapter 6 of Regulations 982 of 4 December 2014 (EIA Regulations), as amended. In addition to this, consideration was also given to the public participation guideline in terms of the NEMA (2017). SLR believes that the public participation process undertaken for this project was of an appropriate requirement for the scale and nature of a prospecting right. Details on the public participation process is detailed in Section 15 and Table 15-1. Proof of correspondence is included in Appendix C.</p>	<p>Section 15 and Table 15-1. Appendix C</p>

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p><i>family (Mafoko's)?</i></p> <ul style="list-style-type: none"> <i>If Impala accept that they have wronged us, when will they reimburse the Mafoko family?</i> <p>It begs the question whether the public participation process was conducted along formulaic lines or allowed for broad based public participation. The FSE has observed that Environmental Assessment Practitioners (EAPs) often apply the same stakeholder group template for every project and only engage with representatives from each group. This mechanistic approach disallows serendipitous input from the community. In terms of the principles of the National Environmental Management Act (107 of 1998), the participation of vulnerable, disadvantaged and marginalised members of mining affected communities must be encouraged as well as the participation by women and the youth. Broad based public engagement with communities and broad support are essential since:</p> <ul style="list-style-type: none"> It will help the Applicant to access local knowledge such as biophysical knowledge of climate, fauna and flora and historical land-use patterns; It will establish the legitimate key role players in the community; It will enhance community participation in identifying post-project options an ultimately taking ownership of post closure initiatives. The mining affected communities will have to live with the legacy. 		
		<p>Secondly, from our understanding of the 2014 EIA Regulations (Appendix 5), a closure plan must include-</p> <p><i>(a) details of -</i></p> <p><i>(i) the EAP who prepared the closure plan; and</i></p> <p><i>(ii) the expertise of that EAP;</i></p> <p><i>(b) closure objectives;</i></p> <p><i>(c) proposed mechanisms for monitoring compliance with and performance assessment against the closure plan and reporting thereon;</i></p>	<p>The Closure Plan was compiled taking into consideration Appendix 5 of the EIA Regulations (in the separate BAR report) and the rehabilitation that has taken place to date in line with the approved EMPr. Table 4-4 of the separate BAR report provides details on where each item of Appendix 5 of the EIA regulations is addressed within the BAR. Table 7-4 of this Closure Plan Report provides details on where each item required for a closure plan in terms of the requirements of Regulation 62 of the MPRDA are addressed.</p>	<p>Appendix C Table 7-4</p>

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p><i>(d) measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity and associated closure to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development, including a handover report, where applicable;</i></p> <p><i>(e) information on any proposed avoidance, management and mitigation measures that will be taken to address the environmental impacts resulting from the undertaking of the closure activity.</i></p> <p>With reference to the closure objectives that need to be achieved, such objectives must include, from a generic perspective, the following:</p> <ul style="list-style-type: none"> • Immediate harm to human health and safety must be eliminated; • Groundwater must be fit for current and future domestic and other uses consistent with agreed current and future land use; • Surface water must be fit for current and future basic human needs and aquatic ecosystems requirements; • Risk of harm to non-aquatic organisms must be eliminated; and • Soil (property) must be fit for use consistent with current and future land use. <p>It is hoped that the above-mentioned legal requirements were complied with in the preparation of the closure plan and will be complied with in the execution of the closure plan.</p>		
		<p>Thirdly, in terms of “National Environmental Management Act (107/1998): Regulations pertaining to the Financial Provision for Prospecting, Exploration, Mining or Production Operations”, the Applicant must make financial provision for: “5 (c) remediation and management of latent or residual environmental impacts which may become known in future, including the pumping and treatment of polluted or extraneous water.”</p>	<p>Prospecting has not taken place on the properties in five years (since 2014).</p> <p>Typically, a period of aftercare and maintenance is applied to each rehabilitated drill site to ensure closure objectives are being met. Given the nature of the prospecting activities, a 2 to 3-year period of maintenance and aftercare is usually applied.</p>	<p>Section 12.1</p>

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise stated	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>Even though the impacts were assessed as low and no mitigation and monitoring measures are proposed, we recommend that the Applicant follows the precautionary approach and make sufficient financial provision for any potential residual and latent impacts.</p>	<p>The drill sites have already had more than 3 years of monitoring, maintenance and aftercare.</p> <p>No residual or latent impacts were identified. In addition, no further maintenance or aftercare activities are deemed necessary; thus, the calculated financial provision is R0.00.</p>	
		<p>Fourthly, it is imperative that regional mine closure strategies for the North West Province be developed and implemented in order to prevent or minimise adverse long-term socio-economic and environmental impacts, and to create a self-sustaining natural ecosystem or alternate land use.</p>	<p>The proposed project is for the closure of prospecting rights that involved the drilling of prospecting boreholes. No alternative land uses were identified other than to rehabilitate disturbed areas in a manner that achieves similar environmental conditions to that of the surrounding land. The prospecting right areas were and continue to be used for cattle grazing.</p> <p>The closure of the prospecting rights does not affect this grazing land use.</p>	<p>Appendix D</p>

16 TECHNICAL APPENDICES

There are no technical appendices; this section is therefore not applicable.

17 CONCLUSION AND RECOMMENDATIONS

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant.

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr.

It follows that no additional active mitigation or monitoring is required.

Based on the estimated rehabilitation and closure costs outlined in Section 12 the updated final financial provision is calculated at R 0.00. Where the DMR agrees that the above is appropriate, the existing financial guarantee of R50 000 would be cancelled.

18 UNDERTAKING

I, Alessandra Pheiffer, the Environmental Assessment Practitioner responsible for compiling this report, undertake that:

- The information provided herein is correct
- Comments and inputs from stakeholders and I&APs have been included and correctly recorded in this report
- Inputs and recommendations from the specialist reports have been included where relevant
- Any information provided to I&APs and any responses to comments or inputs made is correct or was correct at that time.



Signature of EAP

16/8/2019

Date



Signature of commissioner of oath

16-09-2019

Date

**OREN JAN VAN VREDE
COMMISSIONER OF OATHS
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19 REFERENCES

Impala Platinum Limited. 2019. Final geological report for prospecting closure done on the farm Klipgatkop 115 JQ (PR 638/2007), for the period 1 January 2008 to 26 November 2018.

Metago. 2008. EMP amendment for seismic activities at Impala's Rustenburg mining and prospecting operations

Metago. 2008. Updated Klipgatkop prospecting EMP- 09 December 2008.

SLR Consulting. 2016. Amended environmental management programme for Impala Platinum Limited to incorporate prospecting rights on the farms Doornspruit 84 JQ, Roodekraalspruit 113 JQ, Klipgatkop 115 JQ and Diepkuil 116 JQ into the Impala adjacent converted mining right.

SLR Consulting, 2017. Klipgatkop 115 JQ: Prospecting Environmental Management Plan Performance Assessment – (November 2017).

APPENDIX A: EXISTING AUTHORISATIONS

APPENDIX B: EAP CURRICULUM VITAE AND REGISTRATION

APPENDIX C: STAKEHOLDER ENGAGEMENT

- DMR pre-application meeting minutes (including presentation).
- NEMA application, proof of application fee payment, and acknowledgement of receipt from the DMR.
- Royal Bafokeng Administration meeting minutes (including presentation).
- Roodekraalspruit Maile Traditional Council meeting minutes (including presentation).
- Correspondence with the land claims commissioner.
- Newspaper advertisement placed in the Rustenburg Herald.
- Site notice including photographic record and map illustrating the location of the site notices.
- Background Information Document (BID) and proof of distribution.
- Written/telephonic comments received from I&APs on the BID.
- Correspondence on the draft BAR.
- Comments/Correspondence received on the draft BAR.
- Site visit record.

Undertaken directly by Impala

- Letter to the Mosito and Mafoko families on the notification of cessation of exploration projects.

APPENDIX D: RISK ASSESSMENT CRITERIA

APPENDIX E: DETAILED EMP PERFORMANCE ASSESSMENT PROCEDURE

APPENDIX F: LETTER OF RECOMMENDATION FOR EXEMPTION (PISTORIUS, 2019)

APPENDIX G: CLOSURE FORM P



RECORD OF REPORT DISTRIBUTION

Project Number:	710.09003.00139
Title:	Closure Plan for the Closure of the Klipgatkop Prospecting Right
Report Number:	For public and authority review
Proponent:	Royal Bafokeng Resources Platinum (Pty) Ltd / Impala Platinum Limited Unincorporated Joint Venture

Name	Entity	No.	Date issued	Issuer
Phumudzo Nethwadzi	Department of Mineral Resources	3 Hard Copies and 2 CDs	16 August 2019	C. Kotze
Carol Kenyon (Librarian)	SLR's offices in Johannesburg	1 Hard Copy	16 August 2019	C. Kotze

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