

CLOSURE PLAN FOR THE CLOSURE OF THE WOLVEKRAAAL KAREEPOORT PROSPECTING RIGHT

Wolvekraal Kareepoort

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

OCTOBER 2020

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October 2020

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REPORT COMPILATION

REPORT COMPILED BY: Reinett Mogotshi **REPORT REVIEWED BY:** Edward Perry



.....
Reinett Mogotshi
Environmental Consultant

.....
Edward Perry
Reviewer (Registered EAP)

BASIS OF REPORT

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CLOSURE PLAN FOR THE CLOSURE OF THE WOLVEKRAAL KAREEPOORT PROSPECTING RIGHT

EXECUTIVE SUMMARY

PROJECT BACKGROUND

Afplats (Pty) Ltd (Afplats) holds a prospecting right (Department of Mineral Resources and Energy (DMRE) reference number (NW 30/5/1/1/2/1033 (10707) PR) for all minerals with emphasis on PGM's and associated minerals but excluding dimension stone on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. This prospecting right is referred to as the Wolvekraal Kareepoort prospecting right. The prospecting right area is within the Brits Magisterial District 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 2007 and 2014, Afplats undertook prospecting activities on the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled.

In 2013, the Afplats Board made the decision to apply for the inclusion of this prospecting right area into the adjacent Leeuwkop Mining Right 40/2008 (DMRE ref NW 30/5/1/1/2/256 MR), also held by Afplats. The application in terms of Section 102 of the Minerals and Petroleum Resources Development Act (MPRDA), as amended for such inclusion was submitted to the DMRE in June 2013. A decision is still pending from the DMRE. In February 2020, the prospecting right expired, without the option to renew. In terms of Section 43(3) of the MPRDA, a closure application is required once a prospecting right has expired. The areas disturbed by the prospecting activities have been allowed to re-vegetate and will be used by landowners and land users as they were doing prior to the prospecting activities.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Afplats (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Wolvekraal Kareepoort prospecting right.

SUMMARY OF AUTHORISATION REQUIREMENTS

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

- A Closure Certificate from the DMRE in terms of Section 43(4) of the MPRDA.
- An environmental authorisation from the DMRE 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.

STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced prior to the submission of the Basic Assessment Report (BAR) 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 now the BAR 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 BAR. Further comments arising during the review of the BAR will be handled in a similar manner.

This Closure {Plan report has been distributed for a 30-day comment period from **23 October 2020 to 23 November 2020** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the BA process. Copies of the full report are available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>). Hard copies of the report as well as summary documents (in English and Setswana) are available at the Bakwena Ba Mokgopa Tribal Office, Madibeng Ward 40 Councillor Offices and Segwaelane Community Hall. Summaries will also be emailed to I&APs registered on the project database. Electronic copies (compact disk) of the report are available from SLR, at the contact details provided below. In addition, I&APs will be notified via SMS that the BAR and/or summary is available for review.

All comments received during the review process will be addressed in the final BAR that is submitted to the DMRE for decision-making.

SLR Consulting (Africa) (Pty) Ltd
 Attention: Reinett Mogotshi

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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 Wolvekraal Kareepoort 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	Very Low
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Very Low
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Insignificant
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Very Low

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
BA	Basic Assessment
BAR	Basic Assessment Report
BIC	Bushveld Igneous Complex
BID	Background Information Document
CO	Carbon Monoxide
DEA	Department of Environmental Affairs
DMRE	Department of Mineral Resources and Energy
DRDLR	Department of Rural Development and Land Reform
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
I&APs	Interested and Affected Parties
IAIAsa	International Association of Impact Assessment South Africa
IDP	Integrated Development Planning
MAR	Mean Annual Rainfall
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act, Act 25 of 1999
PM	Particulate Matter
PR	Prospecting Right
SACNASP	South African Council for Natural Scientific Professions
SAHRIS	South African Heritage Resources Information System
SLR	SLR Consulting (Africa) (Pty) Ltd
SO ₂	Sulfur Dioxide

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

Afplats (Pty) Ltd (Afplats) holds a prospecting right (Department of Mineral Resources and Energy (DMRE) reference number (NW 30/5/1/1/2/1033 (10707) PR) for all minerals with emphasis on PGM's and associated minerals but excluding dimension stone on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. This prospecting right is referred to as the Wolvekraal Kareepoort prospecting right. The prospecting right area is approximately 16 km west of Brits within the Brits Magisterial District 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 Appendix A.

Between 2007 and 2014, Afplats undertook prospecting activities on the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled.

In 2013, the Afplats Board made the decision to apply for the inclusion of this prospecting right area into the adjacent Leeuwkop Mining Right 40/2008 (DMRE ref NW 30/5/1/1/2/256 MR), also held by Afplats. The application in terms of Section 102 of the Minerals and Petroleum Resources Development Act (MPRDA), as amended for such inclusion was submitted to the DMRE in June 2013. A decision is still pending from the DMRE. In February 2020, the prospecting right expired, without the option to renew. In terms of Section 43(3) of the MPRDA, a closure application is required once a prospecting right has expired. The areas disturbed by the prospecting activities have been allowed to re-vegetate and will be used by landowners and land users as they were doing prior to the prospecting activities.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Afplats Platinum (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Wolvekraal Kareepoort prospecting right.

1.2 PURPOSE OF THIS REPORT

This Basic Assessment Report (BAR) has been compiled and distributed for review and comment as part of a Basic Assessment (BA) process that is being undertaken for the closure of the Afplats prospecting right, near Brits in the North West Province.

This BAR provides a description of the proposed closure project and the affected environment; summarises the BA process followed to date; presents to a closure plan for the project; identifies and assesses the key impacts associated with the decommissioning and closure of the Afplats prospecting right and presents management and mitigation measures.

Interested and Affected Parties (I&APs) are asked to comment on the BAR (see Section below). The document will then be updated into a final report, giving due consideration to the comments received. The BAR will be submitted to the Department of Mineral Resources (DMRE) for consideration as part of the application for Environmental Authorisation in terms of Chapter 5 of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA), as amended.

1.3 SUMMARY OF AUTHORISATION REQUIREMENTS

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

- A Closure Certificate from the DMRE in terms of Section 43(4) of the MPRDA; and
- An Environmental Authorisation from the DMRE 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

SLR, as the independent EAP, is responsible for undertaking the required environmental regulatory process and conducting the public participation process. The terms of reference for the environmental regulatory process are to:

- Make application for Environmental Authorisation of the project in terms of NEMA;
- Make application for the Closure of the proposed project in terms of the MPRDA;
- Ensure the BA is undertaken in accordance with the requirements of NEMA and the EIA Regulations 2014 (as amended);
- Ensure the BA is undertaken in an open, participatory manner to ensure that all potential impacts are identified;
- Undertake a formal public participation process, which includes the distribution of information to I&APs and provides the opportunity for I&APs to raise any concerns/issues, as well as an opportunity to comment on all BA documentation; and
- Integrate all information, including the findings of the specialist studies and other relevant information, into a BAR to allow an informed decision to be taken on the proposed project.

Further to this and in accordance with Appendix A of the EIA Regulations 2014 (as amended), the objectives of a BA process is to:

- Determine the policy and legislative context within which the proposed activity is located and how the activity complies with and responds to the policy and legislative context;
- Identify the alternatives considered, including the activity, location, and technology alternatives;
- Describe the need and desirability of the proposed alternatives;
- Through the undertaking of an impact and risk assessment process inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine -
 - (i) The nature, significance, consequence, extent, duration, and probability of the impacts occurring;
 - (ii) The degree to which these impacts can be reversed, may cause irreplaceable loss of resources; and can be avoided, managed or mitigated;
- Through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to:
 - (i) Identify and motivate a preferred site, activity and technology alternative;
 - (ii) Identify suitable measures to avoid, manage or mitigate identified impacts; and
 - (iii) Identify residual risks that need to be managed and monitored.

This BA process consists of a series of steps to ensure compliance with these objectives and the EIA Regulations 2014. The process involves an open, participatory approach to ensure that all impacts are identified and that decision-making takes place in an informed, transparent and accountable manner.

1.5 OPPORTUNITY TO COMMENT

This Closure Plan report has been distributed for a 30-day comment period from **23 October to 23 November 2020** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the BA process. Copies of the full report are available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and hard copies as well as summary documents (in English and Setswana) are available at the Bakwena Ba Mokgopa Tribal Office, Madibeng Ward 40 Councillor Offices and Segwaelane Community Hall. Summaries will also be emailed to I&APs registered on the project database. Electronic copies (compact disk) of the report are available from SLR, at the contact details provided below. In addition, I&APs will be notified via SMS that the BAR and/or summary is available for review.

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2 LOCATION OF ACTIVITY

2.1 LOCATION OF OVERALL ACTIVITY

A description of the property on which the proposed project is located is provided in Table 2-1. The layout of the decommissioned prospecting drill sites is illustrated in Figure 3.

TABLE 2-1: DESCRIPTION OF THE PROPERTY








Description	Details
Farm Name	Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ
Closure application area (ha)	The Wolvekraal Kareepoort Prospecting Right Area covers an area of approximately 1 065 ha
Magisterial district	The prospecting right area is located within the Brits Magisterial District
Distance and direction from nearest town	The prospecting area is approximately 16 km west of Brits (Refer to Figure 1).
21-digit Surveyor General Code for each farm portion	B0JQ00000000040800002 B0JQ00000000040700001
Co-ordinates (Refer to Figure 2)	A: 27°36'54.356"E 25°35'5.896"S B: 27°37'19.659"E 25°34'57.302"S C: 27°37'55.906"E 25°34'53.61"S D: 27°38'15.71"E 25°37'4.731"S E: 27°38'46.382"E 25°39'3.071"S F: 27°38'23.055"E 25°39'18.734"S G: 27°38'3.129"E 25°39'13.87"S H: 27°37'35.191"E 25°37'14.101"S

2.2 LOCALITY MAP

The regional and local settings are illustrated in Figure 1 and Figure 2, respectively.



Legend

-  Prospecting Right Area
-  Main Roads
-  Rivers
-  Railway Lines
-  Power Lines
-  Dams
-  Protected Areas (SAPAD 2019)

0 1 2 3 4 5 6 7 Km
 Scale: 1:200 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartebeeshoek, Lo27

Aplats (Pty) Ltd

Figure 1

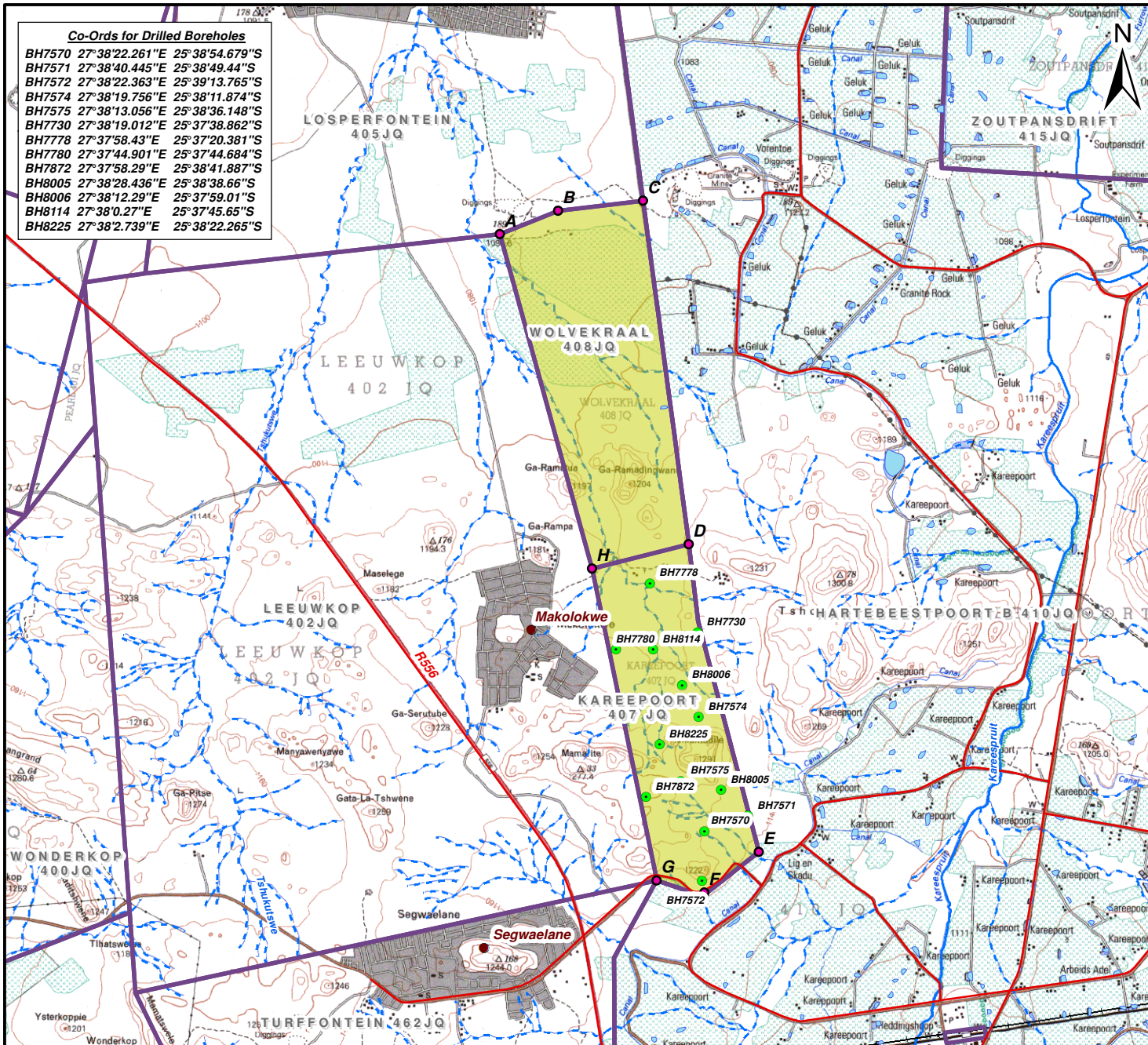
**Regional Setting of Wolvekraal/
Kareepoort Prospecting Right Area**



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2020/04/21



Co-Ords for Drilled Boreholes

BH7570	27°38'22.261"E	25°38'54.679"S
BH7571	27°38'40.445"E	25°38'49.44"S
BH7572	27°38'22.363"E	25°39'13.765"S
BH7574	27°38'19.756"E	25°38'11.874"S
BH7575	27°38'13.056"E	25°38'36.148"S
BH7730	27°38'19.012"E	25°37'38.862"S
BH7778	27°37'58.43"E	25°37'20.381"S
BH7780	27°37'44.901"E	25°37'44.684"S
BH7872	27°37'58.29"E	25°38'41.887"S
BH8005	27°38'28.436"E	25°38'38.66"S
BH8006	27°38'12.29"E	25°37'59.01"S
BH8114	27°38'0.27"E	25°37'45.65"S
BH8225	27°38'2.739"E	25°38'22.265"S

Co-Ords for Wolvekraal/Kareepoort Prospecting Right Area

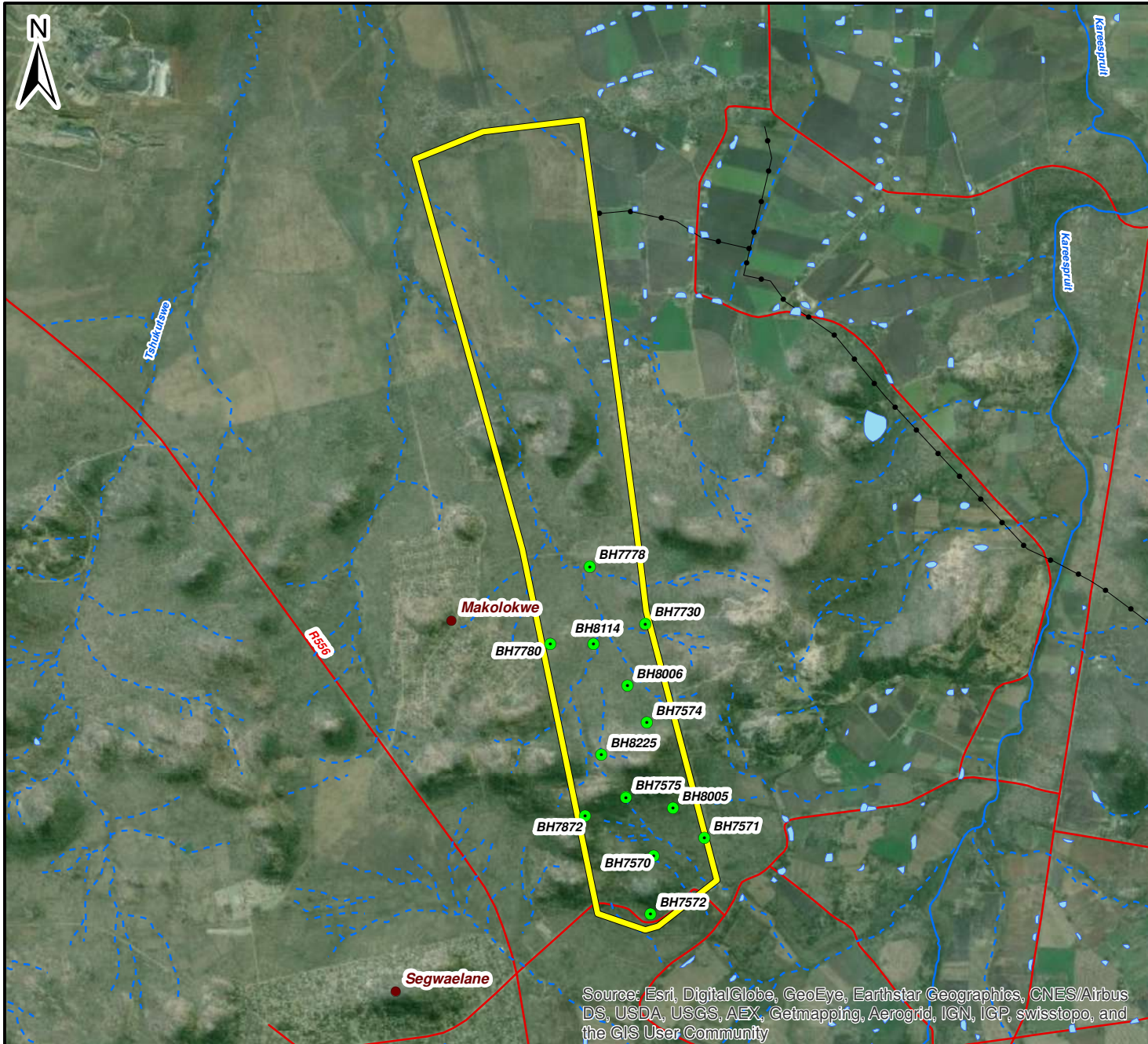
A	27°36'54.356"E	25°35'5.896"S
B	27°37'19.659"E	25°34'57.302"S
C	27°37'55.906"E	25°34'53.61"S
D	27°38'15.71"E	25°37'4.731"S
E	27°38'46.382"E	25°39'3.071"S
F	27°38'23.055"E	25°39'18.734"S
G	27°38'3.129"E	25°39'13.87"S
H	27°37'35.191"E	25°37'14.101"S

- Legend**
- Prospecting Right Area
 - Villages / Towns
 - Farm Boundaries
 - Roads
 - Power Lines
 - Railway Lines
 - Perennial Rivers
 - Non-Perennial Rivers
 - Dams
 - Drill Sites

Scale: 1:70 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartbeeshoek, Lo27

Aiplats (Pty) Ltd

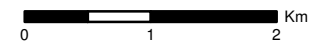
Figure 2
Local Setting of Wolvekraal/ Kareepoort Prospecting Right Area



Legend

- Prospecting Right Area
- Villages / Towns
- Power Lines
- Roads
- Perennial Rivers
- - - Non-Perennial Rivers
- Dams
- Drill Sites

<u>Co-Ords for Drilled Boreholes</u>	
BH7570	27°38'22.261"E 25°38'54.679"S
BH7571	27°38'40.445"E 25°38'49.44"S
BH7572	27°38'22.363"E 25°39'13.765"S
BH7574	27°38'19.756"E 25°38'11.874"S
BH7575	27°38'13.056"E 25°38'36.148"S
BH7730	27°38'19.012"E 25°37'38.862"S
BH7778	27°37'58.43"E 25°37'20.381"S
BH7780	27°37'44.901"E 25°37'44.684"S
BH7872	27°37'58.29"E 25°38'41.887"S
BH8005	27°38'28.436"E 25°38'38.66"S
BH8006	27°38'12.29"E 25°37'59.01"S
BH8114	27°38'0.27"E 25°37'45.65"S
BH8225	27°38'2.739"E 25°38'22.265"S



Scale: 1:60 000 @ A4
 Projection: Transverse Mercator
 Datum: Harthebeeshoek, Lo27

Aplats (Pty) Ltd

Figure 3

Layout of Decommissioned Prospecting Drill Sites



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720.01002.00028

2020/04/21

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

3 DETAILS OF THE APPLICANT AND THE EAP

3.1 APPLICANT DETAILS

The applicant for the project is the Afplats Platinum (Pty) Ltd. Details are provided in Table 3-1 below.

TABLE 3-1: APPLICANT DETAILS

Name:	Afplats (Pty) Ltd
Address:	2 Fricker Road, Illovo, 2196, Johannesburg.
Contact No.	014 569 7638
Responsible person:	Philip Fouché

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 BA process for the proposed closure of the Wolvekraal Kareepoort prospecting right. The details of the EAP project team that are undertaking this BA 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 BA process and has declared its independence as required by the EIA Regulations 2014 (as amended). 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	
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Name	Tasks and roles	Email
Ed Perry (SLR)	BAR, EMPPr, Closure plan and process reviewer	eperry@slrconsulting.com
Stephen van Niekerk (SLR)	Financial provision reviewer	svanniekerk@slrconsulting.com
Reinett Mogotshi (SLR)	Management of the BA process, including public consultation, process review and report compilation	rmogotshi@slrconsulting.com

3.3 EXPERTISE OF THE EAP

Ed Perry joined SLR as the Operations Manager for the Environmental Management Planning and Approvals (EMPA) team in Africa in August 2019. He has worked in environmental consultancy for over twenty years for a wide range of public and private sector clients. Ed is a registered Environmental Auditor with the Institute for Environmental Management and Assessment and a Lead Auditor with the International Cyanide Management Institute. Prior to moving to South Africa in 2011 Ed worked in the UK on a wide range of projects including EIAs and Integrated Pollution and Prevention Permits. This included permitting the first hazardous waste landfill in the UK under the new integrated permitting mechanism and undertaking a study for the European Commission on the implementation of the Landfill Directive in 15 European countries.

Reinett Mogotshi holds an Honours degree in Environmental Analysis and Management (from the University of Pretoria) and has 5 years of experience in both public and private sectors, primarily agriculture, oil and gas, telecommunication, infrastructure, renewable energy and mining. Her focus is execution and management of environmental authorisation processes and waste management. She is a Registered Cand.Sci.Nat (Environmental Science) and is a member of the IAAsa.

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

4 MOTIVATION FOR CLOSURE OF THE PROSPECTING RIGHT

In 2013, the Afplats Board made the decision to apply for the inclusion of this prospecting right area into the adjacent Leeuwkop Mining Right 40/2008 (DMRE ref NW 30/5/1/1/2/256 MR), also held by Afplats. The application in terms of Section 102 of the Minerals and Petroleum Resources Development Act (MPRDA), as amended for such inclusion was submitted to the DMRE in June 2013. A decision is still pending from the DMRE. In February 2020, the prospecting right expired, without the option to renew. In terms of Section 43(3) of the MPRDA, a closure application is required once a prospecting right has expired. The areas disturbed by the prospecting activities have been allowed to re-vegetate and will be used by landowners and land users as they were doing prior to the prospecting activities.

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:

- Open veld used for grazing and cultivation;
- Natural bushveld; and
- Service infrastructure such as tarred and gravel roads (public/private roads).

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

The intended final land use was outlined in the BID made available to I&APs for review and initial comment. No comments relating to land use have been received to date. The closure objective and closure plan for the prospecting right area is outlined in this report which will be made available to landowners and I&APs for review and comment (see Section 15 for further details).

Comments received from 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:

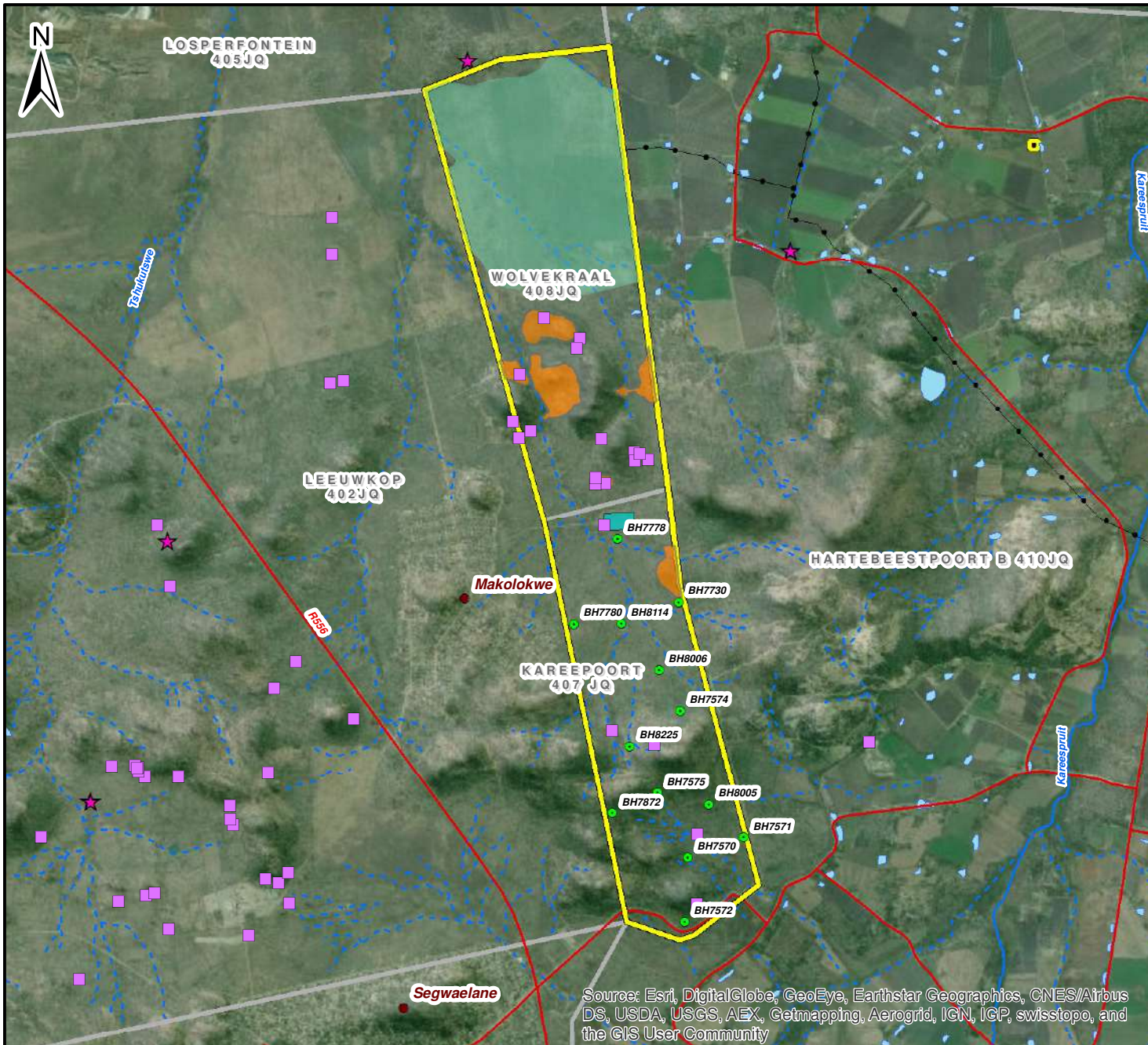
- Achieve physical stability over all landscapes disturbed by prospecting activities;
- Return land to its pre-disturbance potential; and
- Maximise visual 'harmony' with the surrounding landscape.

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 NEMA Closure Plan requirements (Appendix 5 1(i)) of the EIA Regulations, 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.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, ICP, swisstopo, and the GIS User Community

Legend

- Prospecting Right Area
- Villages / Towns
- Drill Sites
- ★ Ruins
- Telecom Tower
- Heritage Sites
- Regional Roads
- Perennial Rivers
- Non-Perennial Rivers
- Agricultural Areas
- Granite Quarring
- Graveyard
- Farm Boundaries
- Dams

0 1 2 Km
 Scale: 1:62 500 @ A4
 Projection: Transverse Mercator
 Datum: Hartbeeshoek, Lo27

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Figure 4

Land Use



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6 PLAN OF AREA UNDER CLOSURE

A plan showing the area under closure including the final 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 0 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 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 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 DMRE 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.

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 298.2.18.2.5
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 DMRE to consider closure of the prospecting site. This information has been included in this report.

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 BA 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.
Madibeng Local Municipality Integrated Development Plan 2018-2019	Madibeng Local Municipality	The Madibeng 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.

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 Wolvekraal Kareepoort prospecting right area are presented in this section.







As part of verifying baseline conditions within the prospecting right area, SLR undertook a site visit of the prospecting right area in June 2020. In addition, where relevant, information from available reports (see reference list included in Section 19) has been used.

A sample of photographs of the drill sites is presented in Figure 5.

FIGURE 5: PHOTOGRAPHS OF DECOMMISSIONED DRILL SITES

<p>Drill Site ID: BH7570 Drilling Started: 2007/12/12 Drilling Completed: 2008/02/06</p>	 <p>Photo take 2009 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: fully re-vegetated</p>
<p>Drilling Site ID: BH7571 Drilling Started: 2007/22/30 Drilling Completed: 2007/12/16</p>	 <p>Photo taken 2008 Note: Recently decommissioned</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH7572 Drilling Started: 2007/10/15 Drilling Completed: 2007/10/29</p>	 <p>Photo taken 2015 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH7574 Drilling Period: 2007/12/01 Drilling Completed: 2008/01/21</p>	 <p>Photo taken 2009 Note: Recently decommissioned</p>	 <p>Photo taken 2020 Note: Full re-vegetated</p>
<p>Drilling Site ID: BH7575 Drilling Period: 2007/12/12 Drilling Completed: 2008/01/26</p>	 <p>Photo taken 2015 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>

<p>Drill Site ID: BH7730 Drilling Started: 2010/10/05 Drilling Completed: 2010/10/27</p>	 <p>Photo taken 2011 Note: Recently decommissioned drill site</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH7778 Drilling Started: 2008/09/03 Drilling Completed: 2008/10/05</p>	 <p>Photo taken 2010 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated, evidence of cattle grazing.</p>
<p>Drilling Site ID: BH7780 Drilling Started: 2009/10/02 Drilling Completed: 2009/10/28</p>	 <p>Photo taken 2010 Note: Recently decommissioned drill site</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH7872 Drilling Started: 2014/06/17 Drilling Completed: 2014/07/24</p>	 <p>Photo taken 2015 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH8005 Drilling Started: 2011/03/16 Drilling Completed: 2011/04/09</p>	 <p>Photo taken 2011 Note: Recently decommissioned drill site</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>

<p>Drill Site ID: BH8006 Drilling Started: 2011/03/18 Drilling Completed: 2011/05/05</p>	 <p>Photo taken 2011</p> <p>Note: Recently decommissioned drill site</p>	 <p>Photo taken 2020</p> <p>Note: Partially re-vegetated</p>
<p>Drilling Site ID: BH8114 Drilling Started: 2012/03/22 Drilling Completed: 2012/05/17</p>	 <p>Photo taken 2012</p> <p>Note: Recently decommissioned</p>	 <p>Photo taken 2020</p> <p>Note: Fully re-vegetated</p>
<p>Drilling Site ID: BH8225 Drilling Started: 2012/12/12 Drilling Completed: 2013/02/13</p>	 <p>Photo taken 2014</p> <p>Note: Partially re-vegetated</p>	 <p>Photo taken 2020</p> <p>Note: Fully re-vegetated</p>

8.1.1 Geology

The geology underlying the prospecting right area comprises the Pyramid Gabbro-Norite of the Main Zone and the Mathlagame Norite-Anorthosite Formation of the Critical Zone of the Bushveld Igneous Complex (BIC) (Afplats, 2019). The BIC consists of two lithologically distinct units that are mainly intrusive into the Transvaal Supergroup: a lower sequence of layered mafic and ultramafic rocks, known as the Rustenburg Layered Suite (RLS), and an overlying unit of granites, known as the Lebowa Granite Suite. All the chromitite and platinum mineralisation is located in the RLS. The prospecting right area is composed of two distinct chromitite seams separated by a narrow pyroxenite parting of no more than a few centimetres. The lower chromitite correlates with what is regionally referred to as the UG2 Reef while the upper unit is the equivalent of the UG2 Leader - the two units together are conveniently referred to as the UG2 Zone.

During prospecting, Wolvekraal Kareepoort targeted the Merensky and UG2 Reefs in order to evaluate the potential for future exploitation of Platinum Group Metals (Afplats, 2019). 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 prospecting right area is characterised by gentle undulating plains with low slope gradients and a generally flat terrain. Semi-mountainous and rugged areas dominate the southern portion of the farm Kareepoort, with the local relief varying from about 1,080 to 1,290 metres above sea level (mamsl) (Afplats, 2019). Much of the prospecting area is characterized by soil cover and rocky outcrops towards the south. Draining in the prospecting right area is towards the north into the Tshukutswe River and south in to the Kareespruit River via minor non-perennial streams that only flow during times of fairly high rainfall.

The topography of the prospecting right area has been influenced by anthropogenic development.

8.1.3 Climate

The climate of the area is semi-arid and experiences typical savannah climatic conditions namely hot and wet summers and cold and dry winters. Rainfall recorded in 2013 at the nearby Kareepoort station was approximately 622 mm per annum and temperatures are in excess of 40°C during Summer months. The winters are dry, with mild temperatures and only occasional frost. Rainfall and temperature affect the rate at which vegetation can recover thus contributes to effective re-establishment of vegetation at the drill sites.

8.1.4 Soils and Land capability

The soil types characteristic of the prospecting right area and surrounds consist of strongly structured black soils known as Calcic Vertisols and Lithic Leptosols. Calcic Vertisols have a very high clay content and are suitable for agriculture provided that there is plenty of rainfall or irrigation water. Lithic Leptosols occur on siliceous parent rock within the koppies in the prospecting area.

There is no material 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. It is expected that these soils would support the re-establishment of vegetation once surface disturbance ceases.

8.1.5 Biodiversity

The prospecting right area falls within the Savanna Biome as classified by Mucina & Rutherford (2006). The biome consists of the Marikana Thornveld and the Norite Koppies Bushveld vegetation types. The Marikana Thornveld is comprised of more open Acacia karroo woodland and occurs in valleys, undulating plains and lowland hills within the prospecting right area. The Norite Koppies Bushveld consists of rocky hills. Approximately 20% of the koppies within this vegetation type are transformed due to urbanisation of surrounding land as well as mining activities (Mucina &

Rutherford 2006). The natural biodiversity within the prospecting right area has been transformed by granite quarrying, cultivation and livestock grazing.

All drill sites within the prospecting right area (Figure 6) are located within the critical biodiversity areas. Given that a considerable amount of the prospecting right area has already been disturbed by agricultural activities as well as granite mining, it is unlikely that the prospecting activities have caused any additional threat to the biodiversity.

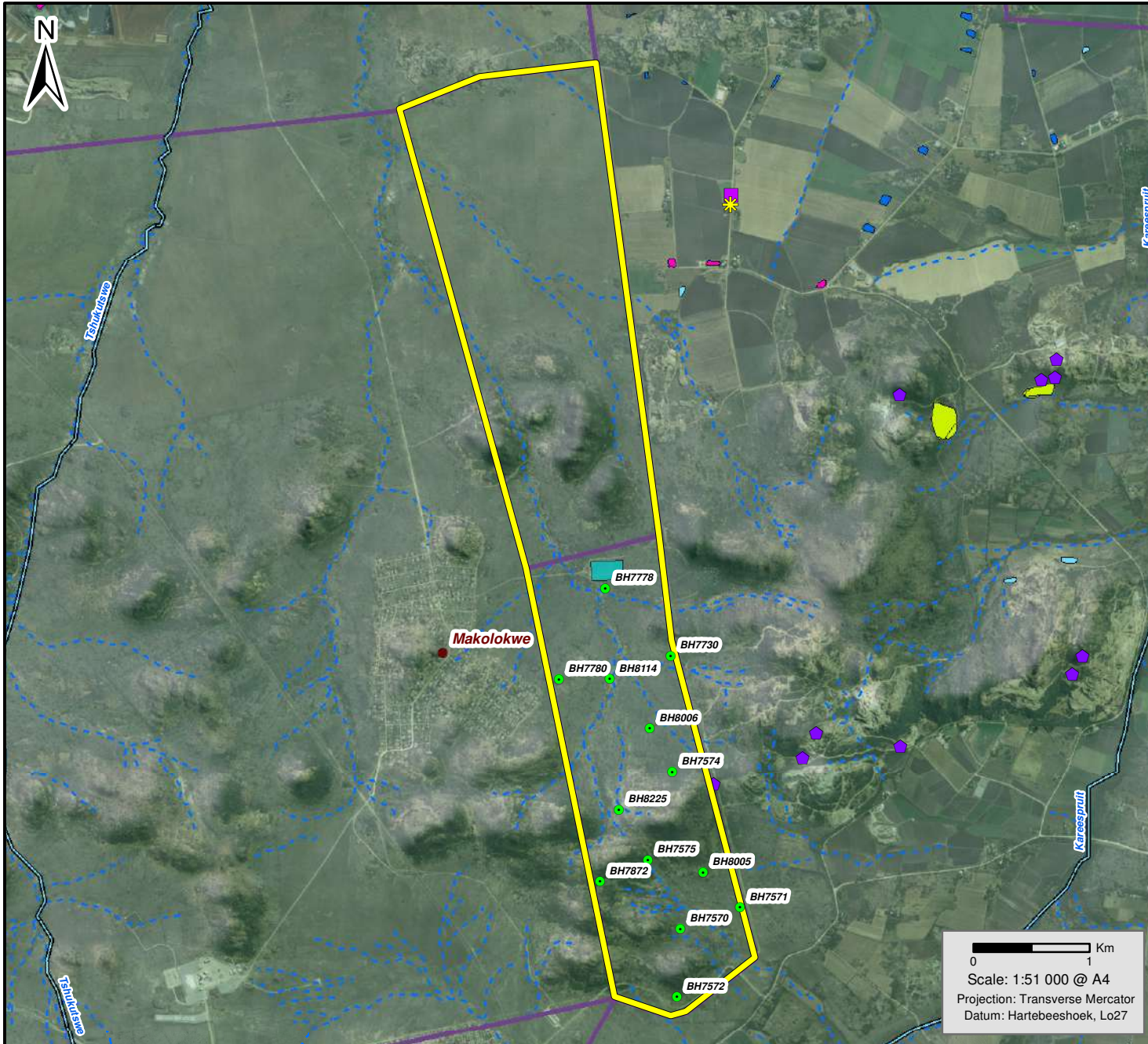
8.1.6 Surface water

The majority of the prospecting right area is located within the A21K quaternary catchment, while a small portion of the south-east section of the study area is located in the A21J quaternary catchment which fall within the Crocodile (West) and Inkomati-Usuthu water management area. The quaternary catchment A21K has a catchment area of 865km² and a mean annual runoff (MAR) of 22.46 million m³. Quaternary catchment A21J has a catchment area of 1151km² and a MAR of 22.65 million m³ (SLR, 2013). The primary watercourse in quaternary catchment A21K is the non-perennial Tshukutswe River. The Tshukutswe River flows northwards to join the Sterkstroom, subsequently flowing into the Roodekopjes reservoir. Quaternary catchment A21J is mostly dominated by non-perennial tributaries of the Kareespruit. These non-perennial watercourses join the more significant Modderspruit, which is also a non-perennial stream. The Kareespruit River flows to the east whereupon it joins the Crocodile River. Water from the Kareespruit is used for domestic and agricultural purposes.

Although five drill sites (BH7778, BH7575, BH7570, BH8114 and BH8225) are located within 100 meters of the non-perennial tributaries., it is not expected that the prospecting activities would have an impact on the surface water flow and quality.

8.1.7 Groundwater

The prospecting right area is underlain by two aquifers, namely a shallow weathered aquifer and a deep non-weathered aquifer. Below the black turf layer, a weathered zone extends down to an average of 10m to 15m below the surface. This weathered zone hosts a shallow, weathered aquifer that consists of residual norite. Based on previous studies the depth of this aquifer generally varies between 0 – 30 m below surface. The recharge to this aquifer is estimated to be in the order of 3% of the annual rainfall. The borehole yields in this aquifer are generally low due to the very low aquifer parameters of the aquifer material. The groundwater quality in undisturbed areas is good due to the dynamic recharge from rainfall (SLR, 2013). Third party water users rely on groundwater for domestic use, irrigation, or livestock watering. Given the non-invasive nature of exploration drilling, the groundwater baseline is expected to have been unaltered by prospecting activities



Legend

- Prospecting Right Area
- Drill Sites
- Villages / Towns
- Historical House
- ◆ Late Iron Age Sites
- ✦ Tobacco Shed
- Graveyard
- Farm Boundaries
- North West CBA and ESA (2015)
- Critical Biodiversity Area 1
- Critical Biodiversity Area 2
- Ecological Support Area 1
- Ecological Support Area 2
- NFEPA Wetlands
- Channelled valley-bottom wetland
- Unchannelled valley-bottom wetland
- Valleyhead seep
- Flat
- NFEPA Rivers
- CLASS C: Moderately Modified

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Figure 6

Sensitivity

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8.1.8 Air Quality

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.

The following sources of emissions were identified in the **surrounding area**:

- Fugitive dust: This includes fugitive dust from paved and unpaved roads, agricultural activities (land preparation and harvesting) and wind erosion from open areas which generates fugitive dust and PM₁₀;
- Granite quarries and other mining operations in the area: These activities include materials handling (i.e. conveyor transfer points, off-loading and loading), land clearing operations, wind erosion from open areas (stockpiles, waste rocks and tailings storage facility), and blasting. These activities may result in emissions such as PM₁₀ (i.e. particulates with an aerodynamic diameter of less than 10µm), PM 2.5 (i.e. particulates with an aerodynamic diameter of less than 2.5 µm), as well as nuisance dust;
- Stack emissions: stack emission include the release of sulphur dioxide (SO₂) and heavy metals from surrounding nearby mining operations;
- Biomass burning: biomass burning emissions include with carbon monoxide (CO), methane (CH₄) and nitrogen dioxide (NO₂) gases;
- Household fuel combustion: It is likely that households within the local communities utilise coal or wood for cooking and space heating (during winter) purposes. Emissions from domestic burning include PM₁₀, carbon dioxide (CO₂), sulphur dioxide (SO₂) and carbon monoxide (CO); and
- Vehicle tailpipe emissions: Significant primary pollutants include carbon dioxide (CO₂), carbon (C), sulphur dioxide (SO₂), oxides of nitrogen (mainly NO), particulates and lead. Secondary pollutants include NO₂, photochemical oxidants such as ozone, sulphur acid, sulphates, nitric acid, and nitrate aerosols (particulate matter).

8.1.9 Noise

The ambient noise environment is typical of a rural area with livestock, birds and human activity as being the main sources of sound in the prospecting right area. Given the temporary nature of exploration drilling and that no prospecting activities are currently taking place or planned to take place, the noise baseline has remained unchanged.

8.1.10 Visual Aspects

Drilled holes are demarcated by a cement beacon and an upright standpipe and are not visible from nearby communities, although this is not expected to materially alter the visual landscape which has already been influenced by the development of the surrounding area, its support infrastructure (powerlines, roads etc.) and granite quarrying.

8.1.11 Heritage/Cultural and Paleontological Resources

There are several heritage resources identified within the prospecting right area, these include Motse (village) of Kgosi Mmamogale of the Bakwena Bamôgôpa, a structure in Mmamogola village, a formal graveyard as well as a cave where several people were buried. The identified sites and the graveyards were not affected by prospecting activities.

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. The surface rights are mainly owned by the South African government, the Republic of Bophuthatswana, companies, communal property associations, trusts and private individuals. Figure 5 provides a delineation of the farm boundaries for the farms listed in the table below.

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

Portion	Landowner
Wolvekraal Kareepoort prospecting right area	
Wolvekraal 408 JQ	Republic of Bophuthatswana
Kareepoort 407 JQ	Republic of Bophuthatswana
Hartebeestpoort B 410 JQ (Adjacent, to the east of the Wolvekraal Kareepoort prospecting right area)	
Various farm portions	Private landowners- 5 listed individuals
Various farm portions	Companies- 7 listed companies/close corporations
Portion 1117	Trusts- 1 listed trust
Various farm portions	Communal property- 1 listed association
Losperfontein 405 JQ (Adjacent, to the North of the Wolvekraal Kareepoort prospecting right area)	
Portion 1	Republic of Bophuthatswana
Portion 2	National Government of the Republic of South Africa
Leeuwkop 402 JQ (Adjacent, to the west of the Wolvekraal Kareepoort prospecting right area)	
Remaining extent	Republic of Bophuthatswana
Turfontein 462 JQ (Adjacent, to the south of the Wolvekraal Kareepoort prospecting right area)	
Remaining Extent	National Government of the Republic of South Africa

Land Claims

The Department of Rural Development and Land Reform (DRDLR) (Land Claims Commissioner) in North West was contacted on 12 May 2020 and confirmed that there are land claims which have been lodged on various farm portions within the prospecting right. SLR is awaiting further details of who the land claimant is in order for them to be engaged as part of the public participation process.

Land uses

Figure 4 provides a visual representation of land uses both within the prospecting right area and at the drill sites themselves. Land use in the prospecting right area (i.e. pre-project land uses) comprises natural bushveld, cultivation, grazing, degraded grassland (disturbed by agricultural activities) and service infrastructure such as tarred and gravel roads (public/private roads) as well as a powerline at the boundary of the prospecting right area in a north easterly direction. Although there are no communities located within the prospecting right area, the Makolokwe community is located 100 meters from the boundary of the prospecting right area.

The land use at the actual drill sites themselves is natural bushveld. This current land uses within the drill sites is similar to the land uses within the broader prospecting right area and these in turn are aligned with pre-prospecting land uses.

Socio-economically, educational levels in the broader area are relatively high as the number of people without any schooling in Rustenburg Local Municipality accounts for 31,18% of the number of people without schooling in the district municipality, and the number of people with postgrad degrees accounts for 45,3% of the number of people with postgrad degrees in the district municipality. In 2017, the unemployment rate of the local municipality was 25,05% (Rustenburg Integrated Development Plan, 2019). The high economic dependency on subsistence scale agriculture and granite quarrying in the broader area has resulted in loss of biodiversity and overgrazing. This has likely influenced the rate at which vegetation has re-established at the 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 open veld with several koppies;
- The Kareespruit River flows in a northerly direction, through the centre of the prospecting right area;
- A powerline at the boundary of the prospecting right area in a north easterly direction;
- Existing service infrastructure including tarred and gravel roads (public/private roads); and
- The landscape has been influenced by granite quarrying activities, cultivated lands and livestock grazing.

8.1.14 Environment and current land use map

A conceptual map showing 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 Wolvekraal Kareepoort 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	Very Low
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Very Low
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Insignificant
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Very Low

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) are being 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 EMPr Performance Assessment

A final environmental audit was undertaken by SLR to inform the closure of the prospecting right.

A site visit was conducted in June 2020. The site visit included a visit to accessible drill sites as well as a general visit to the broader prospecting right area. Photographs were taken at drill sites and are presented in Figure 5. This final environmental audit was informed by the following:

- Previous Prospecting EMPr Performance Assessments;
- Previous Afplats prospecting reports;
- Review of available photographs (2009, 2010, 2011, 2014, 2015, 2016 and 2020) of the drill sites;
- Review of available google earth imageries and climatic data for the drill sites over a specific period; and
- Observations from walking/driving through the prospecting right area.

Based on the above, the following findings are noted for the final environmental audit:

- There are currently no drilling activities taking place on site. 13 drill sites were completed during the prospecting period. The last drill site was completed in July 2014;
- During the June 2020 site visit, no clear distinction could be made between drill sites and the prospecting right area;
- There was evidence of grazing and the presence of invasive species at the drill sites, although this was not unique to the drill sites and was observed across the prospecting right area;
- A short summary of the status of each drill site is provided below. The location of the drill sites is shown on Figure 3 and photographs of drill sites is provided in Figure 5.
 - Drill sites BH7570 (completed in 2008): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7571 (completed in 2007): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7572 (completed in 2007): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7574 (completed in 2008): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7575 (completed in 2008): Standpipe could not be located; the vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7730 (completed in 2010): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7778 (completed in 2008): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7780 (completed in 2009): Evidence of cattle grazing within the broader project area. The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill sites BH7872 (completed in 2014): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;

- Drill sites BH8005 (completed in 2011): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
- Drill sites BH8006 (completed in 2011): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
- Drill sites BH8114 (completed in 2012): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
- Drill sites BH8225 (completed in 2013): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;

- In summary:
 - Drill sites where additional management and monitoring is required: 0; and
 - Drill sites re-established to a satisfactory level 13: (BH7570, BH7571, BH7572, BH7574, BH7575, BH7730, BH7778, BH7780, BH7872, BH8005, BH8006, BH8114 and BH8225).

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. The criteria used to rate each impact is outlined in Appendix D.

The potential impacts/risks have been assessed against the Wolvekraal Kareepoort prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. It should be noted that there are there are third party land uses such granite quarrying at the drill sites as well as within the broader prospecting right area (Section 0). The environmental impacts of this land use remain the responsibility of the quarry operators and landowner. Therefore, these impacts have not been taken into account as part of the assessment.

A summary of the impact assessment is provided in 8.2.1. 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. 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 sites. 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 within the prospecting right area has been influenced to varying degrees by livestock grazing and granite quarrying. The prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). As part of rehabilitation, the drill sites were cleared of waste and contaminated soils and the soils were prepared for re-vegetation.

According to the 2016 EMPr performance assessment, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites¹ (completed between 2013 and 2014) was still in progress at the time and required maintenance and aftercare.

A site verification undertaken to all drill sites within the prospecting right area in June 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at drill site 7780, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

There is no further maintenance or monitoring required for the drill sites. Therefore, 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).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

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)	Low change or disturbance (L)
Duration	Short term (L)	Short term (L)
Extent	A part of the site (VL)	A part of the site (VL)
Consequence	Low	Low
Probability	Conceivable (L)	Conceivable (L)
Significance	Very Low	Very Low
Nature of cumulative impacts	Ongoing livestock grazing and granite quarrying within the prospecting right area would contribute to cumulative impacts on the flora and fauna.	
Degree to which impact can be reversed	Over time, with controlled livestock grazing and cultivation 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.	

¹ Drill Site BH8225 and BH7872

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 on-going dust emissions from exposed areas which could cause a nuisance to surrounding land uses.

Assessment of impact

The current post-prospecting land uses within the prospecting right area include natural bushveld, livestock grazing, granite quarrying and cultivation. The prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). As part of rehabilitation, the drill sites were 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 of the site as a prospecting drill site.

The pre-prospecting land uses within the prospecting right area comprised of mixture of natural bushveld, cultivation, grazing, degraded grassland (disturbed by agricultural activities). Similar land uses post-prospecting still occur at the drill sites and within the broader prospecting right area, however, the extent and intensity of these land uses may have increased in recent years subsequent to the completion of exploration drilling.

The environmental impacts and liabilities for these land uses remains the responsibility of quarry operators and landowners/land users. Therefore, this assessment focuses only on the impacts associated with loss of pre-prospecting land uses as a result of prospecting.

According to the 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites² (completed between 2013 and 2014) was still in progress at the time and required maintenance and aftercare. A site verification undertaken to all drill sites within the prospecting right area in June 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at drill site 7780, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

As the drill sites have re-vegetated successfully, the pre-prospecting land uses on and surrounding the drill sites can continue. Therefore, the loss of pre-prospecting land uses through a lack of or poor rehabilitation 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: 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)	Low change or disturbance (L)
Duration	Short term (L)	Short term (L)
Extent	A part of the site (VL)	A part of the site (VL)
Consequence	Low	Low
Probability	Conceivable (L)	Conceivable (L)
Significance	Very Low	Very Low

² Drill Site BH8225 and BH7872

Nature of cumulative impacts	Ongoing livestock grazing, and cultivations within the drill site areas would contribute to cumulative impacts on land uses.
Degree to which impact can be reversed	Over time, with controlled livestock grazing and cultivation, pre-mining 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 semi-urban in nature and dominated by natural bushveld, livestock grazing and cultivation. As part of rehabilitation, the drill sites were 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 drill hole. This is to allow for easy identification of the site as a prospecting drill site.

According to the 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites (completed between 2013 and 2014) was still in progress at the time and required maintenance and aftercare.

A site verification undertaken to all drill sites within the prospecting right area in June 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at drill site 7780, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

During a drive through the prospecting right area in June 2020, prospecting drill sites were not obvious in the landscape and no visible scaring was noted. Therefore, 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: IMPACT/RISK SUMMARY – VISUAL LANDSCAPE

Issue: Change in the visual landscape of the prospecting right area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	Negligible change or disturbance (VL)
Duration	Very short term (VL)	Very short term (VL)
Extent	A part of the site (VL)	A part of the site (VL)
Consequence	Very Low	Very Low
Probability	Unlikely (VL)	Unlikely (VL)
Significance	Insignificant	Insignificant
Nature of cumulative impacts	Ongoing livestock grazing, and cultivation within the drill site areas would contribute to have cumulative impacts on landscape.	
Degree to which impact can be reversed	With adequate controlled livestock grazing and cultivation, 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 the Wolvekraal Kareepoort prospecting right has the potential to result in both negative and positive socio-economic impacts.

Assessment of impact

The closure of the Wolvekraal Kareepoort prospecting right would prevent Afplats from undertaking any further prospecting activities. 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 Afplats abandoning and exiting from the prospecting project, the mineral resource becomes available for third party applications. Given that the prospecting activities ceased in 2014, the loss of income for contractors which would have resulted in loss of temporary employment opportunities for the communities is considered to be insignificant. This is mainly because, there has not been any income generated as contractors have not been on site for 5 years. Moreover, given the scope and scale of prospecting activities, it is expected that such loss in income would be limited.

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: IMPACT/RISK SUMMARY – SOCIO-ECONOMIC

Issue: Negative and positive socio-economic impacts in the prospecting right area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	Negligible change or disturbance (VL)
Duration	Short term (L)	Short term (L)
Extent	Affecting immediate neighbours (M)	Affecting immediate neighbours (M)
Consequence	Low	Low
Probability	Conceivable (L)	Conceivable (L)
Significance	Very Low	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 Afplat's approved EMPr and closure objectives, and included the activities outlined in Section 10.1 below.

According to the 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities was deemed necessary. The re-establishment of vegetation at drill sites³ (completed between 2013 and 2014) was still in progress at the time and required maintenance and aftercare.

A site verification assessment undertaken at all drill sites⁴ within the prospecting right area in June 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at drill site 7780, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

The final environmental audit completed forms part of this submission. Further detail is included in the final environmental audit in Section 8.2.4.

³ Drill Site BH8225 and BH7872

⁴ Drill Sites BH7570, BH7571, BH7572, BH7574, BH7575, BH7730, BH7778, BH7780, BH7872, BH8005, BH8006, BH8114 and BH8225

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 in line with the approved EMPr. 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 DMRE's standard EMPr format was relevant.

Rehabilitation commitments as detailed in the 2012 EMPr:

Rehabilitation of Access Tracks

- Whenever a mining permit/ prospecting right is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit or right, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to the satisfaction of the Regional Manager;
- 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; and
- 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 prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification.

Rehabilitation of the Office/Camp Site

- On completion of operations, all buildings, structures or objects on the office site shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), which states:
 - (1) When a prospecting right, mining right, retention permit or mining permit lapses, is cancelled or is abandoned or when any prospecting or mining operation comes to an end, the holder of any such right or permit may not demolish or remove any building, structure, object -
 - (a) which may not be demolished in terms of any other law;
 - (b) which has been identified in writing by the Minister for purposes of this section; or
 - (c) which is to be retained in terms of an agreement between the holder and the owner or occupier of the land, which agreement has been approved by the Minister in writing.
 - (2) The provision of subsection (1) does not apply to bona fide mining equipment which may be removed;
 - Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped.
 - Areas containing French drains shall be compacted and covered with a final layer of topsoil with a height of 10cm above the surrounding ground surface.

- The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.
- 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 prospecting operation be corrected and the area be seeded with a vegetation seed mix to his or her specification; and
- Photographs of the camp and office sites, before and during the mining/prospecting operation and after rehabilitation, shall be taken at selected fixed points and kept on record for the information of the Regional Manager.

Rehabilitation of Excavation Area

The following operating procedures shall be adhered to:

- The excavated area must serve as a final depositing area for the placement of tailings during processing;
- Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings;
- Waste, as described in paragraph F 2.3.2 of the EMP, will not be permitted to be deposited in the excavations;
- Once excavations have been refilled with overburden, rocks and coarse natural materials and profiled with acceptable contours and erosion control measures, the topsoil previously stored, shall be returned to its original depth over the area;
- The area shall be fertilised if necessary, to allow vegetation to establish rapidly. The site shall be seeded with a local or adapted indigenous seed mix in order to propagate the locally or regionally occurring flora; and
- 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 prospecting operation, be corrected and the area be seeded with a vegetation seed mix to his or her specification.

Rehabilitation of Processing Areas

- Coarse natural material used for the construction of ramps must be removed and dumped into the excavations;
- On completion of mining/prospecting operations, the surface of the processing areas especially if compacted due to hauling and dumping operations, shall be scarified to a depth of at least 300mm and graded to an even surface condition and the previously stored topsoil will be returned to its original depth over the area;
- Prior to replacing the topsoil the material that was removed from the processing area will be replaced in the same order as it originally occurred;
- The area shall then be fertilised if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local, adapted indigenous seed mix; and
- 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 his or her specification.

Final Rehabilitation

- 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.

Passive Phase - Aftercare and maintenance

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.

For the drill sites, the aftercare and maintenance activities included the monitoring of erosion and vegetation establishment and control and eradication of alien invasive plants.

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 environmental audit, the closure cost estimate below considers the following:

- There are currently no drilling activities taking place on site; and
- The vegetation within all drill sites has re-established to a satisfactory level and no further maintenance or aftercare activities are deemed necessary.

Given that Afplats is applying to close the Wolvekraal Kareepoort prospecting right and no remaining drill holes will be drilled under the prospecting right, only the current closure liability has been included in this report.

The closure cost estimate provided in Figure 7 below. These estimates assume that re-vegetation at all drill sites has been successful and no further monitoring or rehabilitation is required. In this regard there is no allowance made for further maintenance and aftercare activities.

FIGURE 7: CLOSURE COST ESTIMATE

Wolvekraal Kareepoort Prospecting Operations					
Current Closure and Rehabilitation Costs					
Item	Description	Quantity	Unit	Rate	Amount
1	Sealing of boreholes	0,0000	No.	R 1 540,00	R 0,00
2	Demolish and remove concrete drilling platform	0,0000	No.	R 3 080,00	R 0,00
3	Removal of portable ablation facilities	0,0000	No.	R 1 025,00	R 0,00
4	Demolish and backfill sumps	0,0000	No.	R 1 540,00	R 0,00
Item	Description	Quantity	Unit	Rate *	Amount
5	General surface rehabilitation of current drilled sites	0,0000	ha	R 136 400,00	R 0,00
6	General surface rehabilitation of recently rehabilitated sites	0,0000	ha	R 136 400,00	R 0,00
7	General surface rehabilitation of previously rehabilitated sites	0,0000	ha	R 0,00	R 0,00
8	General surface rehabilitation (rip and vegetate) of rehabilitated access tracks	0,0000	ha	R 136 400,00	R 0,00
9	Demobilise and general surface rehabilitation (rip and vegetate) of camp sites	0,0000	ha	R 136 400,00	R 0,00
10	2 to 3 years of maintenance & aftercare of all areas	0,0000	ha	R 20 460,00	R 0,00
				SUB TOTAL 1	R 0,00
11	Preliminary and General	20,0000	%	of Sub Total 1	R 0,00
12	Contingencies	10,0000	%	of Sub Total 1	R 0,00
				SUB TOTAL 2	R 0,00
13	VAT	15,0000	%	of Sub Total 2	R 0,00
				GRAND TOTAL	R 0,00

*Rates have been taken from ""Guideline Document for the Evaluation of the Quantum of Closure-Related Financial Provision Provided by a Mine"" as published by the Department of Minerals and Energy (DME), dated January 2005. The rates have been inflated by 128.45 % to account for escalation since January 2005.

Afplats provided a total of R 59,005.62 as financial provision, as follows: R 10,000 by EFT on 16 January 2006, R 2,000.00 by EFT on 20 Feb 2006, as well as submitted a financial guarantee of R 47,005.62 (Guarantee number: GR/G/00053/1216/0407; 5 December 2016) to the DMRE for the Wolvekraal Kareepoort prospecting right. The updated final financial provision is calculated at R 0.00. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 47,005.62 should be cancelled, and EFT payments refunded.

12.2 CONFIRMATION THAT THE FINANCIAL PROVISION WILL BE PROVIDED

Existing financial provision, totalling R 59,005.62 is in place. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 47,005.62 should be cancelled, and EFT payments refunded, (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 EMPr Performance Assessments;
- Previous Financial Provision reports;
- Prospecting reports;
- Review of historic and current google earth imagery;
- Review of climatic data for the post-drilling period;
- Photographs taken from 2010 to 2016 by SLR and Afplats as part of EMPr performance assessments; and
- A Site visit undertaken by SLR in 2020.

It is assumed that progress of re-vegetation will continue to be influenced by rainfall patterns for the area.

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 Wolvekraal Kareepoort will adhere to these.

Although third party granite quarrying occurs within the prospecting right area, the environmental liability of this activity remains the responsibility of the quarry operators. Therefore, the impacts of quarrying have not been taken into account in this assessment.

This Risk Assessment relies on historic photographs, EMPr performance assessments as well as a site visit undertaken to all drill sites to draw conclusions on the status of rehabilitation within the prospecting right area.

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 BA process and includes consideration of the Closure Plan consultation requirements in terms of the NEMA EIA Regulations. 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.

It should be noted that this public participation process (i.e. stakeholder meetings) covered two separate prospecting right closure projects. Given that these two prospecting rights were immediately adjacent to one another and required engagement with same I&APS, it was considered appropriate that one public participation process was followed.

A record of the public participation process undertaken is outlined in Table 15-1 below and supporting documentation is presented in Appendix C.

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

Steps	Details
DMRE Pre-application meeting	A project-specific pre-application meeting has not been undertaken for this project. Reference has been made to a pre-application meeting held with the DMRE on the 10th of May 2019 in support of a similar prospecting right closure application. In this regard, the same process has been adopted for the Wolvekraal Kareepoort PR Closure and is, therefore, applied to this application
Notification of the land claims commissioner	The Department of Rural Development and Land Reform (DRDLR) (Land Claims Commissioner) in North West was contacted on 12 May 2020 and confirmed that there are land claims which have been lodged on various farm portions within the prospecting right. Despite numerous follow ups, SLR is still awaiting contact details of land claimants from the commissioner. The proof of correspondence is included in Section Error! Reference source not found. and attached in Error! Not a valid result for table.
I&AP database	A database was compiled with input from the Afplats stakeholder engagement team and is being 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 BAR is available for public and regulatory authority review and comment. Landowner, land user, commenting authorities and other I&AP details were verified through a deed search and/or telephonic discussions. A copy of the project database is included in Error! Not a valid result for table..
Background Information Document (BID)	A BID (in English and Setswana) was compiled by SLR. The BID provided: <ul style="list-style-type: none"> • Information about the proposed Wolvekraal Kareepoort prospecting right closure; • Information about the baseline environment of the prospecting right area; • Information about the environmental assessment process (Basic Assessment Process); • Information regarding possible environmental/cultural impacts; and • Information on how I&APs and commenting authorities can have input into the environmental assessment process. <p>The BID was distributed electronically to commenting authorities and I&APs registered on the project database via email on 14 September 2020. A registration and response form will be attached to the BID, which will provide I&APs with an opportunity to register as an I&AP and submit comments on the proposed project.</p> <p>Copies of the BID will be made available on the SLR website (at https://slrconsulting.com/za/slr-documents/) and the data-free website (at slrpublicdocs.datafree.co).</p>

Steps	Details
	Text messages which contain a link to the SLR website, will be sent to all I&APs on the database. Copies of the BID in English and Setswana are included in Appendix C.
Site notices	Laminated site notices (in English and Setswana) were placed within publicly accessible locations 14 September 2020. Photographic proof is included in Error! Not a valid result for table..
Newspaper advertisements	A block advertisement was placed in the Brits Pos on 10 September 2020. A copy of the advertisement is included in Error! Not a valid result for table..

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. A summary of the BAR (in English and Setswana) has been made available to all I&APs registered on the I&AP database. Copies of the full reports will be made available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and the data-free website (at slrpublicdocs.datafree.co).

Summaries will be emailed to I&APs registered on the project database. In addition, text messages which contain a link to the SLR website, will be sent to all I&APs on the database.

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 DMRE for consideration and decision-making. Registered I&APs will receive notification of the final submission to the DMRE.

After the DMRE 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 COMMENTS RAISED BY I&APS

The questions/comments raised have been recorded in Table 15-2 below. All comments/questions received during the Closure Plan Report review period will continue to be collated and responded to in a Comments and Responses Report.

TABLE 15-2: SUMMARY OF COMMENTS RAISED BY I&APS

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Makolokwe Community				
Mr Jack Phalatse	14 September 2020	Can this prospecting right be transferred?	Section 11 of the MPRDA does allow for the transfer of a prospecting right where the requirements for transfer are met as per the MPRDA. However, the Wolvekraal Kareepoort prospecting right has expired and therefore transfer of this right is not possible.	Appendix C
Mr Sydney Mfikoe	14 September 2020	Was a resolution/signed agreement between the communities and Afplats prior to commencement of prospecting activities?	<p>Public Participation as part of the 2007 EMPr A shareholder's agreement was entered into in 2006 between African Platinum Plc, Afplats (Pty) Ltd and the Bakwena Ba-Mogopa Traditional Community in its capacity as a Trustee for a Company to be formed, which forms Annexure C to the executed Principle PR. The Afplats (Pty) Ltd shareholding is:</p> <ul style="list-style-type: none"> • 74% - Impala Platinum Holdings Ltd • 26% - Ba-Mogopa Platinum Investments Proprietary Limited, of which the beneficiaries are the Members of the Bakwena Ba-Mogopa Traditional Community. <p>Public Participation as part of the 2012 EMPr As part of the 2012 EMPr Amendment, The Bakwena Ba Magopa, Council (Headman) Gotsube le Thotwe Communal Property Association and Ngwanadirane Communal Property Association were consulted as landowners within the prospecting right area were consulted telephonically. Copies of the</p>	Appendix C
Mr Sydney Mfikoe and Mr Jack Phalatse	14 September 2020	The community has never been consulted/notified during the approval of the prospecting right and during the current public participation.		

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
			<p>background information documents were provided to the landowners.</p> <p><u>Public Participation as part of the PR Closure</u> For the current environmental process, the following activities were undertaken as part of the public participation process:</p> <ul style="list-style-type: none"> • Placement of Newspaper advert in Brits Pos on 10 September 2020. • Placement of site notices within the surrounding communities on 14 September 2020. • Distribution of the Background Information Document to community leaders on 14 September 2020. • Focused group meetings were held with the representatives from the community on the 14th of September 2020. <p>The Makolokwe community was identified as interested and affected parties for the prospecting right closure and will be kept informed of the project.</p>	
Mr Sydney Mfikoe and Mr Phillip Morebudi	14 September 2020	The community was never provided with the findings of the geological report, can the report for the prospecting right for Afplats be made available to the communities.	From the current drilling done, it appears as if the general geology will be typical to the geology of Bushveld Igneous Complex. 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.	Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Mr Sydney Mfikoe	14 September 2020	Afplats must give back to the communities and should consider educating the community, i.e. they need to consider teaching the children on how to prospect.	Although there are no specific commitments for social upliftment within the Wolvekraal Kareepoort prospecting right. The Afplats Mining Right's Social and Labour Plan makes provision for social upliftment.	Appendix C
Mr Sydney Mfikoe	14 September 2020	Wolvekraal is owned by five families with title deeds. How was the prospecting right granted without consultation with these families?	<p>According to our records, landowners within the Wolvekraal Kareepoort PR area at the time of the approval of the EMPr included the following:</p> <ul style="list-style-type: none"> • Bakwena Ba Mogopa; • Gotsube le Thotwe Communal Property Association; and • Ngwanadirane Communal Property Association. <p>A summary of consultation with landowners is provided below:</p> <p><u>Public Participation as part of the 2007 EMPr</u> The Bakwena Ba Mogopa community was consulted through a letter and negotiations with respect to the BEE deal prior to the approval of the EMPr in 2007.</p> <p><u>Public Participation as part of the 2012 EMPr</u> As part of the 2012 EMPr Amendment, The Bakwena Ba Magopa, Council (Headman), Gotsube le Thotwe Communal Property Association and Ngwanadirane Communal Property Association were consulted as landowners within the prospecting right area were consulted telephonically. Copies of the background information documents were provided to the landowners.</p>	

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Segwaelane Community				
Mr Victor Sibanda	14 September 2020	Clarity was sought as to whether the process is to close the mine?	The environmental assessment process currently undertaken is for closure of the prospecting right that were held on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. In 2013, the Afplats Board made the decision to apply for the inclusion of this prospecting right area into the adjacent Leeuwkop Mining Right 40/2008 (DMRE ref NW 30/5/1/1/2/256 MR), also held by Afplats. The application in terms of Section 102 of the Minerals and Petroleum Resources Development Act (MPRDA), as amended for such inclusion was submitted to the DMRE in June 2013. A decision is still pending from the DMRE. In February 2020, the prospecting right expired, without the option to renew. In terms of Section 43(3) of the MPRDA, a closure application is required once a prospecting right has expired. The areas disturbed by the prospecting activities have been allowed to re-vegetate and will be used by landowners and land users as they were doing prior to the prospecting activities.	Appendix C
Ms Georgina Mosimango	14 September 2020	Can a prospecting right be renewed multiple times? Has Afplats renewed their prospecting rights?	The Wolvekraal Kareepoort prospecting right has been renewed once in 2017 for a 3 year period, since commencement of prospecting right, as the MPRDA provides for a once-off only renewal of a prospecting right. This prospecting right therefore finally expired in February 2020 and cannot be renewed.	Appendix C
Interested and Affected Parties				

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Kahmani Gounden	14 September 2020	Can you please register me as an I&AP for the above-mentioned project.	This stakeholder has been registered as an I&AP on the project database and will received project related information.	Appendix C
Paula Kanyane	16 September 2020	<p>I'd like to enquire about the farming project.</p> <p>I have started a fresh produce greenery which will later include garden centre in my yard in Segwaelane. I need assistance to acquire land so I can produce in bulk. My main focus is small root crops/ vegetables.</p> <p>I'm interested in being part of this project and will appreciate more information please.</p>	<p>This stakeholder has been registered as an I&AP on the project database and will received project related information.</p> <p>Please note that the application in question is for closing of the prospecting right. This means that prospecting activities will no longer continue.</p>	Appendix C
Heritage Resources Agency of South Africa				
Natasha Higgitt	14 September 2020	<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</p>	An application was created on the SAHRIS portal with the following case ID: 15502.	Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>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>		
Commission on Restitution of Land Rights: North West				
L.J Bogatsu	03 June 2020	<p>We confirm that there is an existing land claim against Wolvekraal and Kareepoort. The claim was lodged under Madibeng Local Municipality within Bojanala District. The information reflects on the database of claims lodged between 1 July 2014 and 27 July 2016 in terms of the Restitution of Land Rights Amendment Act, of 2014.</p>	<p>At the time of releasing the BAR for public review, despite numerous follow-ups by SLR, SLR had not received the contact details of the land claimant in order for them to be engaged as part of the public participation process for the closure of the Wolvekraal Kareepoort prospecting right.</p>	Appendix C

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. Given that 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.

Afplats provided a total of R 59,005.62 as financial provision, as follows: R 10,000 by EFT on 16 January 2006, R 2,000.00 by EFT on 20 Feb 2006, as well as submitted a financial guarantee of R 47,005.62 (Guarantee number: GR/G/00053/1216/0407; 5 December 2016) to the DMRE for the Wolvekraal Kareepoort prospecting right. The updated final financial provision is calculated at R 0.00. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 47,005.62 should be cancelled, and EFT payments refunded.

18 UNDERTAKING

We, Reinett Mogotshi the Environmental Assessment Practitioners 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; and
- 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

Date

Signature of commissioner of oath

Date

19 REFERENCES

Afplats. 2019. Final Geological Report for Exploration Done at the Kareepoort Project on the farms Kareepoort 407 JQ and Wolvekraal 408 JQ (PR 613/2007 - DMR Ref: NW 30/5/1/4/1033 PR), for the Period 15 October 2007 to 30 July 2019.

Mucina, L., & Rutherford, M. C. 2006. The Vegetation of South Africa, Lesotho and Swaziland. South African National Biodiversity Institute.

North West Rural, Environment and Agricultural Development (READ). 2015. North West Biodiversity Sector Plan 2015.

Ollis, D.J., Snaddon, C.D., Job, N.M. & Mbona, N. 2013. Classification System for Wetlands and other Aquatic Ecosystems in South Africa. User Manual: Inland Systems. SANBI Biodiversity Series 22. South African National Biodiversity Institute, Pretoria.

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Saad, A.E. 2005. Environmental Management Programme for Prospecting.

SLR 2013. Environmental Impact Assessment and Environmental Management Programme Report for the Changes to Surface Infrastructure at Leeuwkop Platinum Mine and Extension of Mining Rights Area, June 2013.

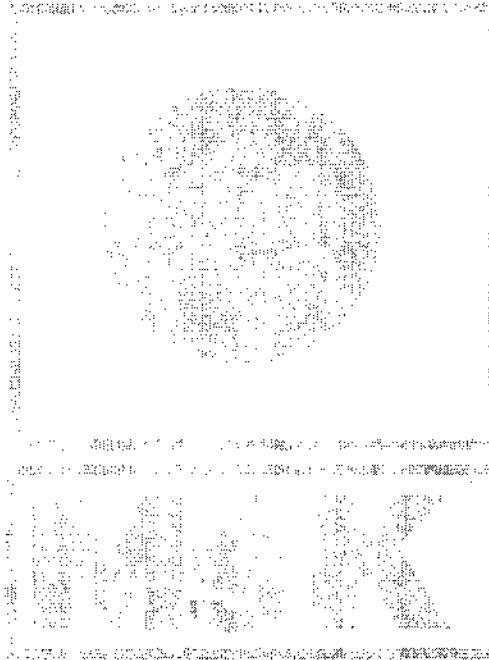
SLR Consulting. 2014. Prospecting EMPr Performance Assessment for the Kareepoort 407 JQ and Wolvekraal 408 JQ June 2014.

SLR Consulting. 2016. Prospecting EMPr Performance Assessment for the Kareepoort 407 JQ and Wolvekraal 408 JQ, June 2016.

APPENDIX A: EXISTING AUTHORISATIONS

PROTOKOL NR: 1/2007

PROSPECTING RIGHT:



AFPLATS (PTY.) LTD.

THE FARMS WOLWEKRAAL 408 JQ

AND

KAREEPOORT 407 JQ

DISTRICT OF BRITZ

MEYER VAN SITTERT EN KROPMAN
PROKUREURS
POSBUS 91, KLERKSDORP, 2570
TEL.: (018) 462-5704

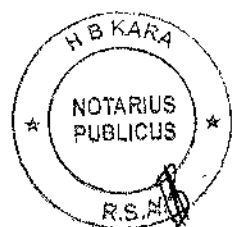


DEPARTMENT: MINERALS AND ENERGY
REPUBLIC OF SOUTH AFRICA

PROSPECTING RIGHT

Granted in terms of section 17(1) of the Mineral and Petroleum Resources Development Act, 2002
(Act No. 28 of 2002)

Minerals and Energy for Development and Prosperity

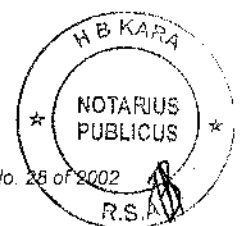


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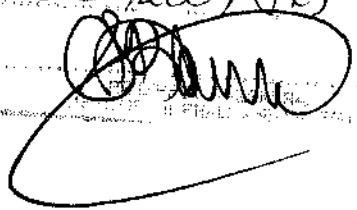
Heading	Clause
Preamble	
Definitions	
Description of the Prospecting Area	1
Granting of Prospecting Right	2
Commencement, Duration and Renewal	3
Amendment, Variation and Abandonment	4
Payment of Royalties and prospecting fees	5
Payment of Interest	6
Restrictions and Obligations Imposed on the Holder	7
Mortgage, Cession, Transfer, and Alienation	8
Protection of Boreholes, Shafts, Adits and Excavations.	9
Holder's Liability for Payment of Compensation for Loss or Damage	10
Inspection of Prospecting Area	11
Cancellation or Suspension	12
Records and Returns	13
Minister's Liability for payment Compensation	14
Compliance with the Laws of the Republic of South Africa	15
Provisions relating to section 2(d) of the Act	16
Severability	17
Domicilia citandi et executandi	18
Costs	19

Prospecting Right: Granted in terms of Section 17 of the Mineral & Petroleum Resources Development Act, No. 28 of 2002



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Registered in the
in the Register of **Prospecting Rights**
on this **27th** day of **Jun 2007**
under **613/2007 (PR)**



Protocol No: 01.

File Ref No

Application No

NW 30/5/1/1/2/1033 PR

J/2005/09/19/003

LET IT HEREBY BE MADE KNOWN:

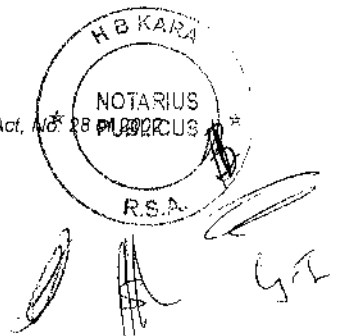
THAT on this 27th day of June in the year 2007, before me, **Hajira Bibi Kara** notary public, duly sworn and admitted, residing and practising at **Klerksdorp**, in the **North West** Province of South Africa, and in the presence of the subscribing competent witnesses, personally came and appeared:

Godfrey I. Mfetoane acting Regional Manager, **North West** Region of the Department of Minerals and Energy, and as such in his/her capacity as the duly authorised representative of:

THE MINISTER OF MINERALS AND ENERGY

The said Regional Manager, being duly authorised thereto under and by virtue of a Power of Attorney granted by the Deputy Director General: Mineral Regulation of the Department of Minerals and Energy on the 23rd day of **May** in the year 2007 in terms of the powers delegated to him by the Minister on the 12th day of May 2004 in terms of section 103 (1) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002),

AND



Allan Emile Saad in his personal capacity as the representative of Afplats (Pty) Ltd, Registration Number:

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(Hereinafter together with his successors in title and assigns referred to as "the Holder", he, the said representative, being duly authorised thereto under by virtue of a resolution of the holder, signed at Johannesburg on the 19th day of April 2007 which a resolution has this day been exhibited to me, the notary and remain filed in my protocol with the minutes thereof

AND THE MINISTER AND HOLDER DECLARED THAT:

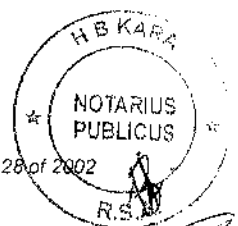
WHEREAS The State is the custodian of the nation's mineral and petroleum resources in terms of section 3 of the Act,

AND WHEREAS The Holder has applied for a prospecting right in terms of section 16 of the Act,

AND WHEREAS The Deputy Director-General: Mineral Regulation has by virtue of the powers delegated to him granted to the Holder a prospecting right in terms of Section 17 of the Act.

NOW THEREFORE THE MINISTER GRANTS A PROSPECTING RIGHT TO THE HOLDER SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS:

Prospecting Right: Granted in terms of Section 17 of the Mineral & Petroleum Resources Development Act, No. 28 of 2002



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Definitions

In this prospecting right, unless the context indicates otherwise, the following words and expressions shall have the meanings assigned to them:

'**Act**' means the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) and includes the Regulations, guidelines, directives and orders made in terms of this Act;

'**Effective date**' means **27th day of June** in the year **2007** (being the date on which the Environmental Management Plan is approved in terms of section 39(4) of the Act);

'**Holder**' is as defined in the Act, and specifically in relation to this right, means **Afplats (Pty) Ltd**, Registration No /Identification No. **200200630407**;

'**Mineral**' is as defined in the Act, and specifically in relation to this right means **all minerals with emphasis on PGM's and associated minerals but excluding dimension stone**;

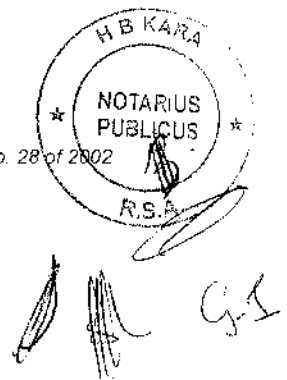
'**Minister**' means the Minister of Minerals and Energy and includes the successors in title, the assignee or any person duly authorised to act in the Minister's place and stead;

'**Prospecting Area**' is as defined in the Act and includes any additional area of environmental liability as may be reflected on the Environmental Management Plan relating to this right;

'**Prospecting right**' is as defined in the Act and includes all the Annexures to it, Agreements and inclusions by reference;

'**Prospecting Work Programme**' is defined in the Act and is as reflected in **Annexure A** to this prospecting right; and

'**Regional Manager**' is as defined in the Act and specifically in relation to this right means the Regional Manager for the **North West** Region of the Department of Minerals and Energy.



1. Description of the Prospecting Area

The Prospecting Area shall comprise the following:

Certain: **The farms Wolwekraal 408 JQ and Kareepoort 407 JQ**

Situated: **North West, Magisterial/Administrative District Brits**

Measuring: **1064.6237** hectares in extent.

(In the case of various farms being involved, a list can be attached and referred to as **Annexure**);

Which Prospecting Area is described in detail on the attached Diagram/plan marked **Annexure B**.

2. Granting of Prospecting Right

2.1 Without detracting from the provisions of sections 5 and 19 of the Act, the Minister grants to the Holder, the sole and exclusive right to:

2.1.1 Prospect for the Holder's own account, the mineral/s in, on and under the Prospecting Area,

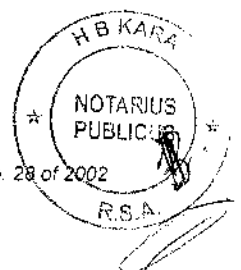
[Where the right to remove has not been granted, Clause 2.1.2, and its sub-clauses above are not applicable and should be deleted and the rest of clause 2 should be amended accordingly before execution].

3. Commencement, Duration and Renewal

3.1. This prospecting right shall commence on **the 27th June 2007** and, unless cancelled or suspended in terms of section 47 of the Act, will continue in force for a period of **five (5) years** ending on **the 26th June 2012**.

3.2. The Holder must commence with the prospecting operations within 120 days from the date on which the prospecting right becomes effective in terms of section 17 (5) of the Act or any later date as may, upon a written request by the Holder, be authorised in writing by the Minister in terms of the Act, failing which this right may be cancelled or suspended.

3.3. Any application for a renewal of this prospecting right shall be submitted to the office of the Regional Manager not later than 60 working days prior to the date of expiry of this right.



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4. Amendments, Variation and Abandonment

- 4.1 The terms of this right may not be amended or varied (including by extension of the area covered by it or by the addition of minerals or a share or shares or seams, mineralized bodies, or strata, which are not at the time the subject thereof) without the written consent of the Minister.
- 4.2 The Holder shall be entitled to abandon or relinquish the right or the area covered by the right entirely or in part. Upon abandonment or relinquishment of the prospecting area or any portion thereof, the Holder must:
- 4.2.1 Furnish the Regional Manager with all prospecting results and/or information, as well as the general evaluation of the geological, geophysical and borehole data in respect of such abandoned area in so far as it applies to the mineral or any other mineral/s obtained in respect of this right, and
- 4.2.2 Apply for a closure certificate in terms of section 43 (3) of the Act.
- 4.3 With effect from the date the Holder has abandoned or relinquished a portion/s of the Prospecting Area, and subject to section 43 of the Act, the Minister is entitled to grant any prospecting rights or mining rights or any right or permit referred to in the Act in, on, or under the portion/s, so abandoned or relinquished, to any person/s.

5. Payment of Prospecting Fees and Royalties

- 5.1 Prospecting fees as contemplated in section 19(2)(f) of the Act are payable to the State by the Holder from the commencement of this right in accordance with Regulation 76 of the Regulations to the Act.
- 5.2 Royalties as contemplated in section 19(2) (g) are payable to the State by the Holder for the sale and/or disposal of the mineral in terms of and upon the implementation by the Minister of Finance of a relevant Act of Parliament or an amendment of an Act of Parliament which provides for such payment.

6. Payment of Interest

If the prospecting fees and royalties referred to in clause 5 above are not paid punctually, the Holder shall be in *mora* and shall pay interest thereon at the rate prescribed in terms of section 80 of the Public Finance Management Act, 1999 [Act 1 of 1999] reckoned from the date on which payment becomes due and payable, to the date of actual payment.



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7. Restrictions and Obligations Imposed on the Holder

- 7.1. The Holder is entitled to the rights referred to in sections 5(2), (3) and 19 of the Act, and such other rights as may be contained in this prospecting right or such other rights as may be granted to, acquired by or conferred upon it by any other applicable law.
- 7.2. Prospecting operations in the prospecting area must be conducted in accordance with the Prospecting Work Programme and the approved Environmental Management Plan and any amendment thereof.
- 7.3. The Holder shall not trespass or enter into any homestead, house or its curtilage nor interfere with or prejudice the interests of the occupiers and/or owners of the surface of the Prospecting Area except to the extent to which such interference or prejudice is necessary for the purposes of enabling the Holder to properly exercise the Holder's rights under this prospecting right.
- 7.4. ~~The holder must, in the event that a mining right is granted in terms of section 23(1) of the Act, beneficiate or facilitate such beneficiation of uranium ore in the Republic of South Africa.~~
- 7.5. ~~The beneficiation or facilitation referred to in clause 7.4, must be carried out in conjunction with the Nuclear Energy Corporation of South Africa (Pty) Ltd (NECSA).~~

8. Mortgage, Cession, Transfer, and Alienation.

This prospecting right, a shareholding, an equity, an interest or participation in the right or joint venture, or a controlling interest in a company, close corporation or joint venture, may not be encumbered, ceded, transferred, mortgaged, let, sublet, assigned, alienated or otherwise disposed of without the written consent of the Minister, except in the case of a change of controlling interest in listed companies.

9. Protection of Boreholes, Shafts, adits and Excavations.

All boreholes, prospecting shafts, adits, excavations, sunk or made, by the Holder during the currency of this prospecting right shall be sealed, closed, fenced, made safe by the Holder in accordance with the approved Environmental Management Plan, the Mine Health and Safety Act, 1996 or any other applicable laws and regulations.

10. Holder's Liability for payment of Compensation for Loss or Damage

- 10.1. The Holder shall, during the tenure of this right while carrying out the prospecting operations under this prospecting right, take all such necessary and reasonable steps to adequately



safeguard and protect the environment, the prospecting area and any person/s using or entitled to use the surface of the prospecting area from any possible damage or injury

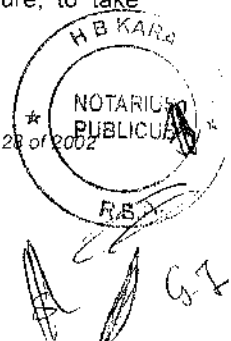
- 10.2. Should the holder fail to take reasonable steps referred to above, and to the extent that there is legal liability, the holder shall compensate such person or persons for any damage or losses, including but not limited to damage to the surface, to any crops or improvements, which such person or persons may suffer as a result of, arising from or in connection with the exercise of his/her rights under this prospecting right or of any act or omission in connection therewith;
- 10.3. Neither the Minister, nor the State, shall be liable for any damage or loss of whatsoever nature that may occur or result from any prospecting activities in terms of this Prospecting Right.

11. Inspection of Prospecting Area

The Minister and/or any person duly authorised thereto in writing by the Minister shall be entitled to inspect the prospecting area, the Holder's prospecting operations and the execution of the approved Environmental Management Plan on the Prospecting Area as provided for in the Act, and any instruction conveyed in writing by the Minister to the Holder requiring the proper performance by the Holder of the Holder's obligations under this prospecting right shall be put into effect by the Holder in terms of the Act.

12 Cancellation or Suspension

- 12.1. Subject to section 47 of the Act, the Minister may cancel or suspend this right if the Holder:
- 12.1.1 Submits inaccurate, incorrect and or misleading information in connection with any matter required to be submitted under the Act;
- 12.1.2 Fails to honour or carry out any agreement, arrangement, or undertaking, including, where applicable, the undertaking made by the Holder in terms of the Broad Based Socio Economic Empowerment Charter ~~and Social and Labour plan~~, on which the Minister relied for the granting of this right;
- 12.1.3 Breaches any material term and condition of this prospecting right;
- 12.1.4 Conducts prospecting operations in contravention of the provisions of the Act;
- 12.1.5 Contravenes the requirements of the approved Environmental Management Plan; or
- 12.1.6 Contravenes any provisions of this Act in any other manner.
- 12.2 Before the Minister cancels or suspends this right, the Minister must:
- 12.2.1 Give a written notice to the Holder indicating the intention to suspend or cancel this right;
- 12.2.2 Give reason/s why the Minister is considering the suspension or cancellation of this right;
- 12.2.3 Give the Holder 30 days to show reasons why the right should not be suspended or cancelled;
- 12.2.4 Notify the mortgagee, [if any] of the intention to suspend or cancel this prospecting right; and
- 12.2.5 Direct the holder, where it is possible to remedy a contravention, breach or failure, to take specified measures to remedy such contravention, breach or failure to comply.



- 12.3. If the Holder does not take the measures as specified by the Minister to remedy a contravention, breach or failure, and after having considered any representations by the holder in terms of clause 12.2.3, the Minister may suspend or cancel this right.

13. Records and Returns

- 13.1. The Holder shall maintain all such books, plans and records in regard to prospecting operations on the Prospecting Area as may be required by the Act and shall furnish to the office of the Regional Manager such reports and documents as may be relevant under this right.
- 13.2. The Holder shall annually furnish to the Regional Manager progress reports contemplated in section 21 (1) (b) of the Act in such a manner and on such timeframes as prescribed by Regulation 8.
- 13.3. The Holder shall furthermore at the end of each year following commencement of this prospecting right, inform the Regional Manager in writing of any new developments and of the future prospecting activities of the mineral/s on the Prospecting Area.

14. Minister's Liability for Payment of Compensation

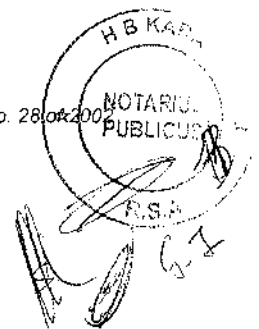
The Minister shall not at any time be liable or responsible for the payment of compensation of whatever nature to the Holder, the Holder's successors-in-title or assigns, or any other person, as a result of the granting of this prospecting right.

15. Compliance with the laws of the Republic of South Africa

The granting of this right does not exempt the Holder and its successors in title and/or assigns from complying with the relevant provisions of the Mine Health and Safety Act, 1996, (Act no.29 of 1996) and any other relevant law in force in the Republic of South Africa.

16. Provisions relating to section 2(d) of the Act

In the furthering of the objects of this Act, the Holder is bound by, where applicable, the provisions of an agreement or arrangement dated 14th October 2006 entered into between the Holder/ empowering partner and **African Platinum Plc and Bakwena Ba-Mogopa Traditional Community as per annexure C** (the empowerment partner) which agreement or arrangement was taken into consideration for purposes of compliance with the requirements of the Act and or Broad Based Economic Empowerment Charter developed in terms of the Act and such agreement shall form part of this right.



17. Severability

Notwithstanding anything to the contrary, any provision of this prospecting right which is contrary to any provision of the Act or which is otherwise ultra vires, null and void, voidable, or unenforceable, shall be severable from the rest of this Right, such rest thus being and remaining of full force, effect and enforceability.

18. Domicilia citandi et executandi

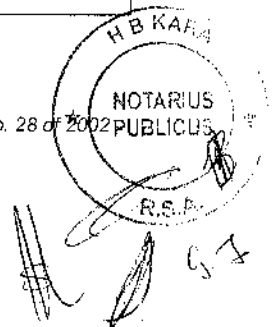
18.1. The parties hereto choose the following addresses as their *domicilia citandi et executandi* and for all purposes arising from this prospecting right, in particular for the purposes of serving of any notice in terms of this prospecting right, and any notice properly addressed to the under-mentioned postal addresses of the parties shall be deemed to have been received by the addressee within 14 days if given in writing and posted by registered post addressed to the addressee at the relevant postal address:

18.1.1. In the case of the Minister:

Physical Address	Postal Address
No. 1 Charel de Klerk Street Senwes Building KLERKSDORP Code 2570 Tel (018) 464 1631 Fax (018) 462 9036	Private Bag A1 KLERKSDORP 2570

18.1.2. In the case of the Holder:

Physical Address	Postal Address
2 Roos Street, Fourways RANDBURG Code 2191 Tel (011) 467 1858 Fax (011) 467 1859	P.O. Box 2055 FOURWAYS RANDBURG 2191



18.2. Notwithstanding anything to the contrary herein contained, a written notice or communication actually received by a party at any place other than the chosen *domicilia citandi et executandi* shall constitute adequate notice or communication to the party notwithstanding that it was not sent to or delivered at such party's chosen *domicilium citandi et executandi*.

18.3. Either party shall be entitled from time to time to change the *domicilia citandi et executandi* or postal address furnished above after giving at least 14 days prior *written* notice of such change to the other party, failing which the above-mentioned addresses will remain in force.


18.4 Any written notice or communication contemplated in this clause which is forwarded by one party to the other by registered post will be presumed to have been received by the addressee on the fourteenth [14] day following the date of posting from an address within the Republic of South Africa to the addressee at the postal address of the addressee for the time being as determined in accordance with the provisions of this clause.

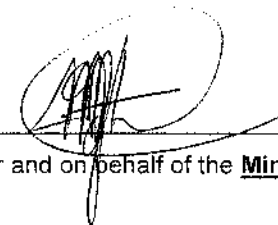
19. Costs

The Holder shall pay all costs and charges incurred in connection with the execution and registration of this prospecting right.

Thus done and signed at **Klerksdorp** on the 27th day of **June** in the year **2007** in the presence of the undersigned witnesses:

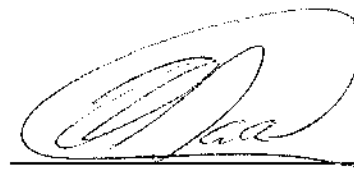
AS WITNESS:

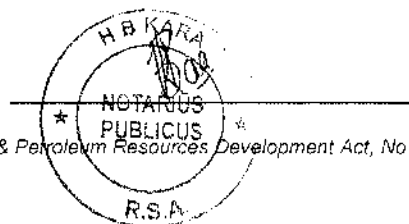



_____ For and on behalf of the **Minister**

AS WITNESS:




_____ For and on behalf of the **Holder**





mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

DMR 10

Private Bag A1, Klerksdorp, 2570, Tel: (018) 487 4300, Fax: (018) 487 4394
Cnr Margaret and Voortrekker Street, Vaal University Building, Klerksdorp, 2571
From: Directorate Mineral Regulation: North West
Enquiries: Lorraine Nobela Email: Lorraine.Nobela@dmr.gov.za
Sub Directorate: Mine Environmental Management Ref: (NW) 30/5/1/2/3/2/1/256 EM

The Manager

Afplats (Pty) Ltd

P.O.Box 2055

FOURWAYS

2055

Dear Sir/Madam

APPROVAL OF ADDENDUM TO THE APPROVED ENVIRONMENTAL MANAGEMENT PROGRAMME IN TERMS OF SECTION 102 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (ACT 28 OF 2002) WHICH IS NOW REGARDED AS ENVIRONMENTAL EAUTHORISATION AND APPROVED IN TERMS OF REGULATIONS 32 AND 33 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO.107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 BY AFPLATS (PTY) LTD TO INCLUDES DEVELOPMENT OF THE WASTE ROCK DUMP, THE ESTABLISHMENT OF THE ADDITIONAL TOPSOIL AND SUBSOIL STOCKPILES, THE EXTENSION OF THE APPROVED WASTE ROCK NOISE BARRIER BETWEEN THE SEGWAELANE COMMUNITY AND THE MINE, THE EXPANSION OF THE SEWAGE WASTE TREATMENT PLANT, EXPANSION OF WATER MANAGEMENT FACILITY (POLLUTION CONTROL DAM), THE DEVELOPMENT OF NEW WATER HOLDING FACILITY (EMERGENCY STORAGE DAM), THE PROPOSED DEVELOPMENT OF A RAW WATER SUPPLY PIPELINE FROM THE WESTERN IRRIGATION CANAL AND THE CHANGE IN THE PLANNED ROUTING ACCESS ROAD SPECIFICALLY AROUND THE SHAFT AREA AND INCREASE IN THE FUTURE PARKING AREA ON THE EXISTING MINING RIGHT ON THE LEEUWKOP 402 JQ, SITUATED IN THE MAGISTERIAL DISTRICT OF BRITS IN THE NORTH WEST PROVINCE.

Kindly note that the EMPr stipulates Environmental Management Programme and a copy thereof should always be available on site.

The EMPr has been approved under the following conditions which must be adhered to:

1. All mining activities must take place in accordance with the approved EMPr.
2. All available topsoil must be stripped and stockpiled separately prior to any surface disturbance.
3. No mining activities and infrastructure are allowed within 1:50 flood line or 100 meters from the edge of the river whatever is the greater, without the necessary authorization from Department of Water and Sanitation (DWS).
4. All mining waste must be taken back to the excavation area for backfilling purposes.
5. **Afplats (Pty) Ltd** (the company) is responsible for all surface disturbances on the mining area, which includes all historical surface disturbances.
6. No mining waste will be allowed to be deposited in a natural drainage lines, erosion gullies and or dongas, unless agreed thereto in writing with the Regional Manager.
7. No dump structures must be left on surface; this includes topsoil stockpiles, overburden stockpiles, waste rocks stockpiles, tailings dumps and slime dams.
8. All excavations must be backfilled to the natural surface level, if a bulk factor exist it must be accommodated on the total area of disturbance.
9. A surveyed plan must be submitted every year to the Regional Manager that indicates:
 - The position, footprints and volumes of all topsoil stockpiles, overburden dumps, waste rock dumps and slime dams (any structures that is above the natural surface).
 - The positions, surface areas and depths of all open pits.
 - The positions and surface areas of all rehabilitated areas (please indicate the status of rehabilitation-backfilled, profiled/landscaped, top soiled, vegetated or monitoring and managing).
10. The rehabilitation fund must be upgraded or revised on an annual basis according to the surveyed plan, which indicates the progress in rehabilitation.
11. Monitoring and performance assessment report as contemplated in terms of section 24Q of the National Environmental Management Act, 1998 (Act No. 107 of 1998) must be submitted to the Regional Manager: Mineral Regulation.
12. Any project, expansions or additional infrastructure must be addressed through an addendum and submitted to the Regional Manager: Mineral regulation for the approval, before they commerce. This approval may be amended at any stage if deemed necessary.
13. Should any archaeological artefact be exposed during the mining activities in the vicinity of findings it must be stopped. Under no circumstances shall any artefact be destroyed. Such an archaeological site must be marked and fenced off, and South African Heritage Agency must be contacted as soon as possible.
14. This approval does not purport to absolve your company from its common law obligations towards the surface rights holder or any other affected party.

15. The following Acts are applicable and relevant to the said approval and your company is to familiarize itself with its provisions in so far as they apply to the company's operations:

- The National Water Act, 1998 (Act No.36 of 1998), with particular reference to the sections pertaining to the mining or mining in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses.
- The Environmental Conservation Act, 1989 (Act No.73 of 1989). Your attention is specially directed to the requirements of section 20 of the above Act.
- The National Environmental Act: Air Quality Act, 2004 (Act No.39 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by mining activities, into the atmosphere.
- The Conservation of Agriculture Resources Act, 1983 (Act No.43 of 1983), with particular reference to sections pertaining to soil conservation.
- The National Heritage Resources Act, 1999 (Act No. 25 of 1999), with particular reference to sections pertaining to the protection of all historical and pre-historical cultural remains.
- The Mine Health and Safety (act 29 of 1996) in conjunction with Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), with particular reference to sections and regulations pertaining to health and safety at mines; mining within 100 meters from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.
- The National Environmental Management Act, 1998 (Act No.107 of 1998), with particular reference to sections principles in chapter 2 of the said Act.

16. All persons concerned must be made fully conversant with the terms of this approval, copies of which must be readily available to them.

Yours faithfully



.....
REBONE HELLEN NKAMBULE
CHIEF DIRECTOR: WESTERN REGIONS
NORTH WEST REGION

DATE: 27/3/2017

ACKNOWLEDGE OF RECEIPT:.....

DATE:.....

All the correspondence should be addressed to the attention to the Regional Manager of the Department of Mineral Resources: North West Region. Please quote this office file number as reference.

APPENDIX B: EAP CURRICULUM VITAE AND REGISTRATION

CURRICULUM VITAE



ED PERRY

OPERATIONS MANAGER

Environmental Management Planning & Approvals,
South Africa

QUALIFICATIONS

Postgrad Cert.	2016	Postgraduate Certificate in Occupational Health and Safety, University of Cape Town
Postgrad Cert.	2012	Postgraduate Certificate in Environmental Law, Centre for Environmental Management, Potchefstroom
Postgrad Cert.	2008	Postgraduate Certificate in Environmental Assessment, Oxford Brookes University
MSc	1994	MSc Applied Hydrobiology, Cardiff University
BSc (Hons)	1990	BSc (Hons) Environmental Science, Plymouth University

EXPERTISE

- Environmental and Social Impact Assessments
- EHSS Auditing
- Environmental Compliance
- Management Systems
- Due Diligence

Ed Perry joined SLR as the Operations Manager for the Environmental Management Planning and Approvals (EMPA) team in Africa in August 2019. He has worked in environmental consultancy for over twenty years for a wide range of public and private sector clients.

Ed is a registered Environmental Auditor with the Institute for Environmental Management and Assessment and a Lead Auditor with the International Cyanide Management Institute. Prior to moving to South Africa in 2011 Ed worked in the UK on a wide range of projects including EIAs and Integrated Pollution and Prevention Permits. This included permitting the first hazardous waste landfill in the UK under the new integrated permitting mechanism and undertaking a study for the European Commission on the implementation of the Landfill Directive in 15 European countries.

Since moving to South Africa, Ed has been involved with ESIA's and environmental authorisations throughout Africa. Ed has been Project Director / Partner in Charge of EIAs for a wide range of facilities including: Renewable Energy Facilities; Metal Extractive Industries; Large Water Storage Schemes; and New Mine and Extensions to Mines.

Ed has also undertaken a wide range of environmental audits including; due diligence audits, EMPR audits, and over 20 international cyanide code audits of mines throughout Africa.

PROJECTS

A sample of Ed's project experience, summarised by sector, is provided below.

Mining

Anglo-American – Polokwane Smelter, Polokwane

Ed was the Project Manager responsible for undertaking an external compliance audit for the Anglo-American Polokwane Smelter as stipulated in the slag stockpile permit for the Polokwane Metallurgical Complex. This included a review of the permit for the temporary stockpile of ash as part of the expansion of the Complex.

<p>Eurasian Natural Resources Corporation – Kakanda Mine, DRC</p>	<p>Ed was the Project Manager for the review of a Safety, Health, Environment and Community Management System for Kakanda Mine in the DRC.</p>
<p>Continental Coal Limited – Penumbra, South Africa</p>	<p>Ed was the Lead Auditor undertaking review of EIA, EMP and site procedures against the requirements of the IFC Procedures.</p>
<p>Ruighoek Mine, South Africa</p>	<p>Ed was the Project Manager for an ESIA associated with the expansion of this chromium mine in South Africa.</p>
<p>AngloGold Ashanti – Yatela, Sadiola, Siguri Gold Mines, Mali and Guinea</p>	<p>Ed was the Lead Auditor and Project Manager undertaking a re-certification audit against the requirements of the International Cyanide Code for three gold mines.</p>
<p>Freda Rebecca Gold Mine - Zimbabwe</p>	<p>Ed was the Lead Auditor and Project Manager for a gap audit to ascertain the status of the gold mine with regards to its ability to comply with the International Cyanide Code</p>
<p>Gold Fields Ghana – Tarkwa and Damang Gold Mines</p>	<p>Ed was the Lead Auditor and Project Manager undertaking a re-certification audit against the requirements of the International Cyanide Code for the two gold mines.</p>
<p>Goldfields, Harmony, AngloGold Ashanti – South Africa</p>	<p>Ed was the Lead Auditor and Project Manager undertaking a re-certification audit against the requirements of the International Cyanide Code for 5 gold mines for AngloGold Ashanti, 4 gold mines for Harmony, and a gold mine for Gold Fields.</p>
<p>Maamba Collieries Limited – Maamba Coal Mine, Zambia</p>	<p>Ed was the lead auditor leading the creation and implementation of an integrated management system in accordance with the requirements of the IFC performance standards, ISO 14001, ISO 9001, and OHSAS 18001.</p>
<p>Eramet - Senegal</p>	<p>Lead Auditor for a due diligence audit of a mineral sands mining operation. The operation was the subject of a possible joint venture. The environmental audit, which included 3 days on site, was to establish if what environmental risks were involved with the project, which was just about to enter the construction phase.</p>
<p>Nyoto Minerals – Tula Kapi Mine, Ethiopia</p>	<p>Ed was the technical reviewer for the ESIA undertaken on behalf of Nyoto Minerals for the Tula Kapi Gold Mine in Ethiopia.</p>
<p>Riversdale Capital – Zambeze Coal Mine, Zambia</p>	<p>Ed was the Technical Reviewer for an ESHIA for the development of the Zambeze Coal Mine on behalf of Riversdale Capital.</p>
<p>Confidential – proposed mine, South Africa</p>	<p>Ed was the Project Manager for an ESIA for a new proposed iron ore mine in South Africa. This application was withdrawn following baseline studies by specialist showing the existence of fatal flaws with regards to water use and location of the TSF.</p>
	<p>Industry</p>
<p>Distell – South Africa</p>	<p>Ed was Project Manager for a number of projects for Distell in order to obtain various environmental authorisations for their brewing facilities including the one for the siting of a new waste water treatment works.</p>

SPAR – South Africa	Ed was Project Manager for a number of energy projects undertaken for SPAR in South Africa including looking at Science Based Targets, Internal Carbon Pricing, and an ISO 50001 Energy Management System.
SCAW – South Africa.	Ed was the Project Manager for a range of Environmental Authorisations, including ESIA's, Air Emissions Licences, Water Use Licences and contaminated land assessments. These studies were undertaken for SCAW at a number of their smelter sites in Gauteng over a 5 year period.
Confidential – South Africa	Ed lead an EHS audit of a cable tie manufacturer using plastic extrusion as part of a due diligence project.
Pfizer – South Africa	Ed was the Project Manager and Lead Auditor for an EHS audit of the head offices of Pfizer in South Africa.
Sasol - Sasolburg	Ed was the Project Manager and Lead Auditor for International Cyanide Code recertification audit for the Sasol cyanide production facility at Sasolburg.
Sohar Aluminium - Oman	Ed was the Lead Auditor of Sohar Aluminium's environmental management system auditing the system against the requirements of ISO 14001 and benchmarking this facility against international requirements.
Confidential – KZN, South Africa	Lead Auditor for a due diligence audit of a white goods manufacturing company in Kwa-Zulu Natal.
Sasol – Secunda	Ed was the Lead Auditor for a third party audit of waste contractors operating on behalf of Sasol. The audit investigated compliance with South African environmental legislation and environmental best practice.
Confidential – South Africa, Kenya, UAE	Ed was the project manager for a due diligence audit of a packaging company's facilities in South Africa, Kenya and UAE.
	Infrastructure
Lesotho Highlands Development Agency - Lesotho	Ed took over as Project Manager undertaking an ESIA for the Polihali Reservoir and Western Access Road in Lesotho on behalf of the Lesotho Highlands Development Agency.
Freight Forwarders Group – Kenya and Tanzania	Ed was the Lead Auditor undertaking a re-certification audit against the requirements of the International Cyanide Code for the Freight Forwarders transportation group of companies.
Transnet Pipelines – South Africa	Ed was the Project Manager responsible for the creation and implementation of an Energy Management System for all of the pumps stations, workshops and offices for Transnet Pipelines, who pump crude oil and petroleum products from Durban to Johannesburg.
Vehrad Transportation - Ghana	Ed was the Project Manager and Lead Auditor undertaking a re-certification audit of Vehrad Transportation against the requirements of the International Cyanide Code.

	Oil and Gas
Shell – South Africa	Ed was the Project Manager for various environmental authorisations in South Africa associated with the Shell GUESS program. This program related to the closure and clean up of Shell service stations.
Vopak – Richards Bay, South Africa	Ed was the Project Manager for an ESIA for a new terminal operated by Vopak at Richards Bay for the handling and storage of Liquid Petroleum Gas and Clean Petroleum Products.
Vopak – Durban, South Africa	Ed was the Project Manager for an ESIA for the expansion of the Vopak terminal at Durban Docks for the handling and storage of Liquid Petroleum Gas and Clean Petroleum Products.
Bidvest – Durban South Africa	Ed was the Project Manager for an ESIA for the expansion of the Bidvest terminal at Durban Docks for the handling and storage of Liquid Petroleum Gas and Clean Petroleum Products.
	Power
Department for International Development – UK Government	The UK Department for International Development is providing support to medium sized renewable energy facilities (mainly hydroelectric power plants) in Uganda through the Global Energy Transfer Feed in Tariff programme (GET FiT). The project was to assess how local communities in the vicinity of these facilities could obtain power and how environmental and social safeguards for these types of facilities could be improved in the future. Ed was the lead environmental and social advisor undertaking a review of the environmental and social safeguards.
Confidential - Angola	Ed was Project Manager for a project undertaking a Strategic Environmental Assessment of locations for renewable energy facilities in Angola.
Confidential - Mozambique	Ed was the Project Manager for an ESIA to be submitted to the Mozambican authorities for the development of a unique renewable energy pilot facility.
MEMBERSHIPS	
IEMA	Practitioner for the Institute of Environmental Management and Assessment
IEMA	Registered Environmental Auditor
PUBLICATIONS	
	<ul style="list-style-type: none"> • The Role of Socio-Economic Factors, Seasonality and Geographic Differences on Household Waste Generation and Composition in the City of Tshwane. 2016 (Wastcon). • EMS as a Tool for Integrated Business Risk Management. 2005 (various journals). • Golder Associates EMS Roadmap. 2004 (CD ROM).

	<ul style="list-style-type: none">• Incentives to Encourage Recycling. 2002. Materials Recycling Week
	<ul style="list-style-type: none">• Recycle of Life. 2002. Government Business
	<ul style="list-style-type: none">• New Approaches to Management of Waste. 2002 (various journals)
	<ul style="list-style-type: none">• Minimise the Waste – Maximise the Message. 2001
	<ul style="list-style-type: none">• Guide to Waste Reduction on Construction Sites. 1999. Construction Confederation

EAPASA

Unit 19 Oxford Office Park
3 Bauhinia Street
Highveld Techno Park
Centurion
0157
Tel. (+27) 12 880 2154

Environmental Assessment Practitioners Association of South Africa

Advancing environmental assessment practice in South Africa



Email: registrar@eapasa.org / Website: www.eapasa.org

Mr Edward Perry
2 Nonoti Gardens
15 Nonoti Avenue, Berea
Durban
4001

Sent by email to: eperry@slrconsulting.com

Dear Mr Perry

Registered Environmental Assessment Practitioner: Number 2019/1210
Edward James Perry : South African ID 6606136020185

The Environmental Assessment Practitioners Association of South Africa (EAPASA) herewith certifies that Edward James Perry is a Registered Environmental Assessment Practitioner (EAP) in accordance with the prescribed criteria of Regulation 15.(1) of the Section 24H Registration Authority Regulations (Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the National Environmental Management Act (NEMA), Act No. 107 of 1998, as amended).

Your registration is duly authorised by EAPASA as the single Registration Authority for EAPs in South Africa (appointed as per Regulation No. 104, Gazette No. 41434 of 8 February 2018, in terms of section 24H(3)(a) of the NEMA). Your status as a Registered EAP is displayed in the 'EAP Register' - please find your name and contact email address at

<https://registration.eapasa.org/registered-practitioners>

Your registration is effective for a period of five years from 23 April 2020, and expires on 23 April 2025. The renewal of your registration in 2025 will be contingent on you having met the requirements of EAPASA's Continuing Professional Development (CPD) policy during each year of registration.

As a Registered EAP you are required to uphold the EAPASA Code of Ethical Conduct and Practice in your professional endeavours, towards the goal of quality assurance in environmental assessment practice.

Please accept my congratulations on your registration.

Best regards

Dr Richard Hill
Registrar
Date: 23 April 2020

Board Members: Ms Snowy Makhudu (Chairperson), Mr Khangwelo Desmond Musetsho (Vice-Chairperson),
Mr Ntsako Baloyi, Mr Zama Dlamini, Mr Siyabonga Gqalangile, Ms Jacqui Hex, Mr Phumudzo Nethwadzi, Mr Danie Neumann.
Registrar: Dr Richard Hill
NPO Reg. No. 122-986

CURRICULUM VITAE



REINETT MOGOTSHI

JUNIOR ENVIRONMENTAL CONSULTANT

Environmental Management, Planning and Approvals,
Africa

QUALIFICATIONS

PgDi	2018	Postgraduate Diploma in Environmental Management
BSc (Hons)	2014	BSc (Hons) Environmental Analysis and Management
BSc	2013	BSc Environmental Sciences

EXPERTISE

- Environmental and Social Impact Assessment
- Strategic Environmental Assessments
- Geographic Information System
- Stakeholder Engagement
- Screening Studies

Reinett has 6 years' experience in undertaking Environmental Impact Assessments in the agriculture, oil and gas, telecommunication, infrastructure, and renewable energy and mining sector. She has experience working in South Africa, Namibia, Equatorial Guinea, Angola, Benin, Zambia and Zimbabwe. Reinett's primary focus has been in the execution and management of environmental authorisation processes, waste management and Environmental Management Programs as required by environmental legislation.

PROJECTS

Projects that Reinett has worked on at SLR and prior to SLR

Closure of Inkosi prospecting rights in the North West Province
(Present)

Project manager for the Inkosi prospecting right closure. Inkosi is planning the closure of its prospecting right. SLR has been appointed to support the client team with environmental impact assessment, rehabilitation and closure planning and financial provision calculations.

Closure of Imbasa prospecting right in the North West Province
(Present)

Project manager for the Imbasa prospecting right closure. Imbasa is planning the closure of its prospecting right. SLR has been appointed to support the client team with environmental impact assessment, rehabilitation and closure planning and financial provision calculations.

Confidential Power Client (2018).

Stakeholder engagement consultant for the Environmental and Social Impact Assessment for the proposed Batoka Gorge Hydro-Electric Scheme on the Zambezi River. Reinett was responsible for managing the stakeholder database, recording comments received from interested and affected parties and drafting the stakeholder engagement plan for the project execution.

African Infrastructure Investment Managers (2019)

Commercial project manager for the Environmental and Social Impact Assessment for the Maria Gletta Power Plant in Benin. Reinett was responsible for research and updating the ESIA. She then took on the financial and technical role towards the end of the project.

Confidential Oil and Gas Project (2019)	Project consultant for the Environmental Impact Study for a 2D Seismic Data Acquisition in the Benguela and Namibe Basins in Angola. Reinett 's role entailed compilation of the report.
METISS (2018-2019)	Assistant project manager for the Environmental Impact Assessment for Metiss subsea telecommunications cable to be landed near Amanzimtoti in South Africa.
Indian Ocean Xchange (2018-2019)	Project consultant for the Environmental Impact Assessment for IOX subsea telecommunications cable to be landed near the East London IDZ, South Africa.
Eni (2018-2019)	Stakeholder Engagement Support for the Environmental and Social Impact Assessment for the offshore exploration drilling within Block ER236, Off the East Coast of South Africa. Reinett supported the project by managing the stakeholder database and recording comments received from interested and affected parties.
Noble Energy (2018)	Environmental Impact Assessment for Alen Gas Export Pipeline in Equatorial Guinea. Reinett was responsible for research and report compilation.
Distell Group Limited, South Africa (2018)	Project manager for the registration of biogas production for the Distell wastewater treatment plant.
Confidential Power Project (2018)	Project consultant for the Power Options Analysis for a mine in Madagascar. Reinett contributed to the power options analysis by reviewing the IFC General EHS guidelines, IFC sector-specific guidelines for solar and wind, World Bank Pollution Prevention and Abatement Hand and the AfDB Integrated Safeguards System.
Confidential Oil and Gas Project (2018)	Project consultant for the update of Environmental Impact Assessment for Offshore Seismic in Namibia.
Confidential Mining Project (2018)	Project consultant for the update of a Resettlement Action Plan in Limpopo. Reinett supported the project by providing assistance with reviewing policies, data capturing, mapping area of influence.
Guma Projects (2018)	Project consultant for the Part 1 Amendment Application for Three Olyven Kolk Photovoltaic Power Plants within Siyanda District Municipality, Northern Cape, South Africa. Reinett was involved in the completion of the applications for amendment, engagement with the competent authority and writing the motivation that there has been no change in the receiving environment for the project.
Letsatsi Solar Power (2018)	Project consultant for the Draft Retrospective Amendment Report Version 2 for the Letsatsi (Previously Southdrift) Solar Power Facility, Near Soetdoring Dam, Free State Province. Reinett was involved in drafting the amendment report and stakeholder engagement.
Juwi South Africa (2017)	Project manager for the Scoping and Environmental Impact Assessment for the proposed development of 300 MW Kap Vley Wind Energy Facility and supporting electrical infrastructure near Kleinzee in South Africa. Reinett was involved in the management of the Kap Vley Wind Energy facility project. Her role entailed the management of a specialists, reporting and stakeholder engagement process.

<p>Department of Environmental Affairs (2017)</p>	<p>Project officer for Phase II of the Strategic Environmental Assessment for Wind and Solar PV Energy Development Projects in South Africa. Reinett's role entailed the management of extensive stakeholder engagement, sensitivity mapping for Bats and contracting of specialists a specialist.</p>
<p>Jam Rock (Pty) Ltd (2017)</p>	<p>Project manager for the Basic Assessment for the proposed development of a chicken broiler facility on Portion 40 of the Farm Jonathan 175- JQ near Brits in the North West Province. Reinett's role involved project management and support, report writing, compilation of socioeconomic baseline studies and stakeholder engagement.</p>
<p>Department of Environmental Affairs (2015-2017)</p>	<p>GIS Technician for the Special Needs and Skills Development Programme: Programme management. Reinett was responsible for mapping of the distribution of application received under the Special Needs Programme. She also produced thematic sensitivity maps using ArcGIS for the projects within the programme.</p>
<p>Alphomega Farming (2016)</p>	<p>Project manager for the Basic Assessment and Waste Management Licence for the proposed development of a pig production enterprise on Portion 18 of Portion 3 of the Farm Poortje 340-IQ, Vereeniging in South Africa. Reinett's role involved project management and support, report writing, compilation of socio-economic baseline studies and stakeholder engagement.</p>
<p>MEMBERSHIPS</p>	
<p>SACNASP</p>	<p>Registered with the South African Council for Natural Scientific Professions as a Candidate Natural Scientist (Cand.Sci.Nat.) in Environmental Science (Reg. No. 117924)</p>
<p>IAIA</p>	<p>Member of the International Association for Impact Assessments (IAIA), South African Affiliate since 2017</p>

APPENDIX C: STAKEHOLDER ENGAGEMENT

- Meeting minutes of the focussed engagements with the Segwaelane and Makolokwe Community Leaders;
- Site notices, map (Figure 3) illustrating the location of the site notices and proof of site notices placed on 14 September 2020;
- Copies of advertisement placed in the Brits Pos newspaper on 10 September 2020; and
- BID in English and Setswana and proof of distribution.

PROOF OF PLACEMENT OF ADVERT

Wonderwerk ná ongeluk

Na 'n ernstige ongeluk Woensdagaand, 2 September 2020 tussen 'n bakkie en 'n trok op die R566 by Econo Fuel Langpiet, het 'n vrou op die ongelukstoneel in kraam gegaan en geboorte geskenk aan tweelingseuntjies. "Ons het die ma en tweeling na 'n hospitaal in Brits vervoer en dit gaan goed met hulle," vertel Leandré Spies, woordvoerder van HEMS "en HEMS het ook die bestuurder en passasier wat agterop die bakkie was, wat ernstige beserings opgedoen het, vervoer." (Foto: HEMS)



AFPLATS (PTY) LIMITED
APPLICATION FOR CLOSURE OF THE WOLVEKRAAL 408
JQ AND KAREEPOORT
407 JQ PROSPECTING RIGHT

PUBLIC PARTICIPATION PROCESS:
INVITATION TO REGISTER AND COMMENT

Afplats (Pty) Ltd (Afplats) holds a prospecting right from the Department of Mineral Resources (now referred to as the Department of Mineral Resource and Energy). The prospecting right (NW 30/5/1/1/2/1033 PR) is for platinum group metals and associated minerals but excluding dimension stone on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. This prospecting right is referred to as the Wolvekraal Kareepoort prospecting right. The prospecting right area is approximately 16 km west of Brits within the Rustenburg Local Municipality and Bojanala Platinum District Municipality in the North West Province.

Between 2007 and 2014, Afplats undertook prospecting activities on the above-mentioned portions of the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled. Afplats is now planning to close its Wolvekraal Kareepoort prospecting right. The Wolvekraal Kareepoort prospecting right has expired on 7 February 2020, with no further option to renew.

Prior to the proposed closure of the prospecting right, an environmental authorisation is required from the Department of Mineral Resource and Energy. In support of this, Afplats is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Afplats to manage the environmental assessment process. The public participation process is being undertaken in terms of the NEMA: EIA Regulations (GNR 982, 4 December 2014), as amended.

To ensure that you are identified as an interested and/or affected party (I&AP) or to receive more detailed information on the project please submit your name, contact information and interest in the matter in writing to the contact person(s) given below by **29 September 2020**. Any I&APs registered on the project database will be notified when the Draft Basic Assessment Report (BAR) and Closure Plan Report will be available for review and will be given the opportunity to review and submit comments on the BAR, Closure Plan Report and/or summary document. The BAR, Closure Plan Report and summary document will be made available in October 2020. Where responses or comments are received by **29 September 2020** these will be included in the BAR and Closure Plan Report for public review, however I&APs will have the opportunity to submit comments until the end of the BAR and Closure Plan Report review period.

Reinett Mogotshi

Project Reference: Wolvekraal Kareepoort PR Closure

Email: rmogotshi@slrconsulting.com

Tel: 011 467 0945

Fax: 011 467 0978

Post: PO Box 1596, Cramerview, 2060

Note: If using post, please also contact us telephonically to notify us of your submission.



Saterdag, 5 September het 'n ligte voertuig klaarblyklik 'n U-draai op die Lethlabile-pad gemaak en teen 'n bakkie gebots. "Drie persone wat in die voertuig was, is beseer waarvan een ernstig en twee minderjariges, minder ernstig. HEMS het dié drie beseerdes en een persoon, wat in die bakkie was en redelike ernstige beserings opgedoen het, na 'n hospitaal in Brits vervoer." (Foto: HEMS)

SITE NOTICES AND PROOF OF PLACEMENT

AFPLATS (PTY) LIMITED

APPLICATION FOR CLOSURE OF THE WOLVEKRAAL 408 JQ AND KAREEPOORT 407 JQ

PUBLIC PARTICIPATION PROCESS: INVITATION TO REGISTER AND COMMENT

Afplats (Pty) Ltd (Afplats) holds a prospecting right (Department of Mineral Resources and Energy (DMRE) reference number (NW 30/5/1/1/2/1033 PR) for all minerals with emphasis on platinum group metals and associated minerals but excluding dimension on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. This prospecting right is referred to as the Wolvekraal Kareepoort Prospecting Right. The prospecting right area is approximately 16 km west of Brits within the Rustenburg Local Municipality and Bojanala Platinum District Municipality in the North West Province.

Between 2007 and 2014, Afplats undertook prospecting activities on the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled. Afplats is now planning to close the Wolvekraal 408 JQ and Kareepoort 407 JQ prospecting right.

Prior to the proposed closure of the prospecting right, an environmental authorisation is required from the Department of Mineral Resources (DMR). In support of this, Afplats is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Inkosi to manage the environmental assessment process. The public participation process is being undertaken in terms of the NEMA: EIA Regulations (GNR 982, 4 December 2014), as amended.

To ensure that you are identified as an interested and/or affected party (I&AP) or to receive more detailed information on the project please submit your name, contact information and interest in the matter in writing to the contact person(s) given below by **29 September 2020**. Any I&APs registered on the project database will be notified when the Draft Basic Assessment Report (BAR) will be available for review and will be given the opportunity to review and submit comments on the BAR and/or summary document. The BAR and summary document will be made available in **October 2020**. Where responses or comments are received by **29 September 2020** these will be included in the BAR for public review, however I&APs will have the opportunity to submit comments until the end of the BAR review period.

Reinett Mogotshi

Project Reference: Wolvekraal Kareepoort PR Closure

Email: rmogotshi@slrconsulting.com

Tel: 011 467 0945

Fax: 011 467 0978

Post: PO Box 1596, Cramerview, 2060

Note: If using post, please also contact us telephonically to notify us of your submission.

AFPLATS (PTY) LIMITED

LEKWALOKOPO LA GO EMISIWA GA TETLELELO YA GO BATLA DIMENERALA MO
WOLVEKRAAL 408 JQ LE KAREEPOORT 407 JQ

TIRO YA GO TSAYA KAROLO GA MORAFE: TALETSO YA GO IKWADISA LE GO TSHWAELA

Afplats (Pty) Ltd (Afplats) e na le tetelelo ya go batla dimenerala (nomoro ya referense ya DMRE ya (NW 30/5/1/1/2/1033 PR) ya dimetale tsa setlhophha sa polatinamo le diminerala tsa mofuta wa tsone (mme di sa akaretse letlapa le le betlilweng) Karolo 2 ya polasi ya Wolvekraal 408 JQ le Karolo 1 ya polasi ya Kareepoort 407 JQ. Lefelo le ba nang le tetelelo ya go batla dimenerala mo go lone e ka nna 16 km kwa bophirima jwa Brits mo teng ga Mmasepala wa Selegae wa Rustenburg le Mmasepala wa Kgaolo wa Bojanala Platinum mo Porofenseng ya Bokone Bophirima.

Gareng ga 2007 le 2014, Afplats e ne ya simolola ditiro tsa go batla dimenerala mo polasing Wolvekraal 408 JQ le Kareepoort 407 JQ, mo nakong e go neng ga epiwa dipetse tse 13 go ya ka patlisiso e e letleletsweng. Jaanong Afplats e rulaganya go emisa tetelelo ya go batla dimenerala mo Wolvekraal 408 JQ le Kareepoort 407 JQ.

Pele ga kemiso e e kopelwang ya go ka emisa tetelelo ya go batla dimenerala, go tlhokega gore Lefapha la Ditswammung (Department of Mineral Resources [DMR]) le neye thebolelo ya go dira ditiro mo tikologong. Go tshegetsisa seno, Afplats e tlhokiwa gore e neye kopo ya go tswala go ya ka Karolo 43(4) ya Molao wa Tswelediso ya Peteroliamo le Ditswammung (Mineral and Petroleum Resources Development Act) (No. 28 ya 2002) (MPRDA). Mo godimo ga moo, go emisiwa ga tiro epe mo go tlhokang setifikeiti sa go tswala tiro go ya ka Karolo 43 ya MPRDA ke tiro ya Listing Notice 1 tlase ga Melawana ya Tshekatsheko ya Kamego ya Tikologo (Environmental Impact Assessment [(EIA)], 2014 (e e fetotsweng) mme go tlhokega tiro ya motheo ya tshekatsheko go ya ka Molao wa Naga wa Taolo ya Tikologo (National Environmental Management Act) (No. 107 ya 1998) (NEMA).

SLR Consulting (Africa) (Pty) Ltd (SLR), feme e e ikemetseng ka nosi ya bagakolodi ka tsa tikologo, e tlhomilwe ke Inkosi go laola tiro ya tshekatsheko ya tikologo. Tiro ya go tsaya karolo ga morafe e dirwa go ya ka NEMA. Melawana ya EIA (GNR 982, 4 Sedimonthole 2014), e e fetotsweng.

Go tlhomamisa gore o motho yo o kailweng o le wa batho ba ba nang le kgatlhego kgotsa wa ba ba amegang (*interested and/or affected party* [I&AP]) kgotsa o tshwanetse go nwa tshedimosetso e e tlhalosang porojeke ka botlalo ka botlalo, re kopa gore o romele leina la gago, tshedimosetso ya go ikgolaganya le wena le gore o na le kgatlhego efe mo kgannyeng eno ka go kwalela (ba)motho yo go ka ikgolagangwang le ene fa tlase fano ka **29 Letswe 2020**. Bo-I&AP bape ba ba kwadisitsweng mo dathabeising ya porojeke eno ba tla itsisiwe fa Terafote ya Pego ya Ntsha ya Tshekatsheko (*Basic Assessment Report* [BAR]) e nna teng go ka tlhatlhabiwa mme ba tla nwa tshono ya go tlathlhaba le go naya ditshwaelo mo BAR le/kgotsa mo tokumenteng ya tshobokanyo. BAR le tokumente ya tshobokanyo di tla nna teng go bonwa ka kgwedi ya **Diphalane 2020**. Fa ditsibogo kgotsa ditshwaelo di amogetswe ka **29 Letswe 2020** di tla tsenngwa mo BAR gore di tlathlhabiwe ke morafe, lefa go ntse jalo bo-I&AP ba tla nna le tshono ya go naya ditshwaelo tsa bone go fitlha kwa bofelong jwa nako ya tlathlhabo ya BAR.

Reinett Mogotshi

Referense ya Porojeke: Wolvekraal Kareepoort PR Closure

Imeile: rmogotshi@slrconsulting.com

Mogala: 011 467 0945

Fekese: 011 467 0978

Ka Poso: PO Box 1596, Cramerview, 2060

Elatlhoko: Fa e le gore o dirisa poso, tsweetswee o ikgolaganye le rona gape ka mogala go re itsise gore o rometse





Photo 1: Makolokwe Enterprise

25°37'23.55"S 27°37'4.18"E



Photo 2: Makolokwe Bottle Store

25°37'23.75"S 27°37'8.02"E



Photo 3: Segwaelane Clinic

25°39'58.76"S 27°36'34.48"E



Photo 4: Segwaelane Community Centre

25°40'16.07"S 27°36'48.17"E

STAKEHOLDER FOCUSSED MEETING MINUTES



AFPLATS (PTY) LTD

CLOSURE OF THE WOLVEKRAAL KAREEPOORT PROSPECTING RIGHT

MINUTES OF THE FOCUSED-MEETING HELD AT THE SEGWAEELANE COMMUNITY HALL

DATE AND TIME	14 September 2020, 11:45
VENUE:	Segwaelane Community Hall
SLR COMPANY:	SLR Consulting (South Africa) (Pty) Ltd (SLR)
PROJECT NUMBER:	720.01002.00028
PURPOSE:	The purpose of the focussed meeting was: <ul style="list-style-type: none">• To provide information on the Prospecting Right (PR) closures;• To provide an overview of each of the projects and related environmental assessment processes information;• To provide an overview of the findings from the Basic Assessment Reports;• To provide I&APs with an opportunity to raise any issues and concerns (both positive or negative); and• To outline the way forward for the project.
ATTENDANCE:	An attendance register is presented in Appendix 2.

1. OPENING AND INTRODUCTION

Ms Maria Mokemele (Kgosana) opened the meeting and thanked the attendees for availing themselves for the meeting. She welcomed Mr Webster Diale (Stakeholder Engagement Officer) from Impala Platinum Limited (Implats) and Ms Reinett Mogotshi (Environmental Assessment Practitioner) from SLR Consulting (South Africa) (Pty) Ltd). The meeting was also attended by representatives from the various sections of Segwaelane.

The meeting was mainly conducted in Setswana (the main local language of the attendees), with the participants given the opportunity to raise questions in Setswana.

Compliance with the COVID-19 regulation were adhered to. Every participant wore a mask, the temperature of the participants was checked on entry, the chairs were placed 1,5m apart and the attendees sanitized their hands before entry into the Segwaelane Community Hall.

2. PRESENTATION

Ms. Reinett Mogotshi gave a presentation which provided an overview of the proposed prospecting right closure projects, the related environmental authorisation application processes, impacts assessed and findings the Basic Assessment Reports. Copies of the meeting presentation were made available and handed out to attendees at the meeting. A copy of the presentation is included in Appendix 1.

3. ISSUES RAISED

Questions and issues were raised during the meeting. These have been recorded in table 1 below. Where a response was provided, the response has been included in the table.

TABLE 1: ISSUES RAISED DURING THE FOCUSED MEETING AND RESPONSES GIVEN BY THE PROJECT TEAM

Name	Issues Raised	Response given by Project Team
Mr Victor Sibanda	Clarity was sought as to whether the process is to close the mine?	The environmental assessment process currently undertaken is for closure of the prospecting right that were held on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ. Following prospecting activities, a formal mining right application will have to be lodged with the Department of Mineral Resources and Energy for mining to commence. In this case, the Afplats Board made the decision not to apply for a mining right and commence with mining, as it was found that the project is not economically viable (SLR).
Ms Georgina Mosimango	Can a prospecting right be renewed multiple times? Has Afplats renewed their prospecting rights?	The Wolvekraal Kareepoort prospecting right has been renewed multiple times since commencement of prospecting activities. However, this prospecting right expired as the project is not economically viable (SLR).

4. WAY FORWARD

The way forward presented at the focussed meeting is outlined below.

- The comments raised in the meeting will be captured and addressed, these comments will be included in the Draft Basic Assessment Reports and Closure Plan Reports to be released for public review.
- SLR will use the contact details provided to keep participants informed of the release of the reports for public review. These reports will be placed at Segwaelane Community Hall for review.
- The Comments and Response Report, addressing issues raised will be send electronically to Kgosana to share with the participants.
- Site notices were given to the community leaders for placement at all strategic places in the village for other people to read, comment or ask more question to the address provided.

5. CLOSE

Ms Maria Mokemele thanked attendees for their input and for attending the meeting. The meeting was closed at 13:30.

APPENDIX 1: PRESENTATION

AFPLATS (PTY) LTD

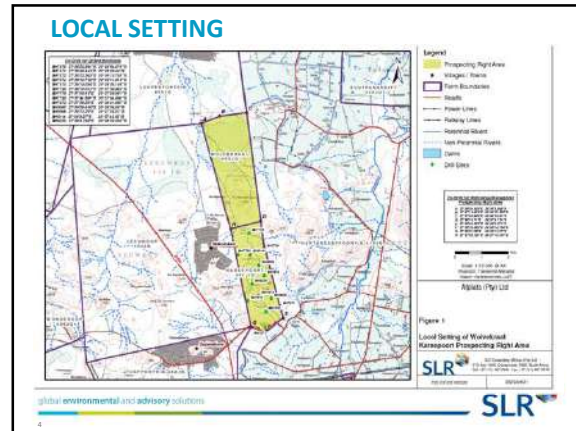
THE CLOSURE OF THE WOLVEKRAAL AND KAREEPOORT PROSPECTING RIGHT

KEY STAKEHOLDER MEETING

SEPTEMBER 2020




1



4

AGENDA

- Welcome and opening
- Overview of the prospecting activities
- Environmental process overview
- Proposed public participation process
- Discussion
- Close




2

ENVIRONMENTAL PROCESS (1)

Permissions required:

Application	Authorisation required	Applicable legislation	Competent authority
Closure of then Wolvekraal Kareepoort prospecting right	PR closure certificate Environmental Authorisation	Mineral and Petroleum Resources Development Act No. 28 of 2002 National Environmental Management Act (107 of 1998) (NEMA) 2014 EIA regulations (Chapter 5, part 2 application process)	Department of Mineral Resources and Energy (DMRE)




5

PROSPECTING RIGHT CLOSURE

Afplats (Pty) Limited hold the following prospecting right:

- **Prospecting right numbers:** : NW 30/5/1/1/2/1033 PR
- **Properties:** Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ.
- **Minerals covered in PR:** platinum group metals and associated minerals but excluding dimension stones.
- **Location:** The prospecting right area is approximately 16 km west of Brits within the Rustenburg Local Municipality and Bojanala Platinum District Municipality in the North West Province.
- After completion of the prefeasibility work, the Afplats Board made the decision not to apply for a mining right, as it was found that the project is not economically viable.

Afplats prospecting right expired on 07 February 2020. Afplats submitted an application to include the Wolvekraal Kareepoort prospecting right area into the adjacent Leeuwkop mining right in June 2013, which is still pending a decision by the DMRE.



3

ENVIRONMENTAL PROCESS (2)

Regulatory authorities


- North West Department of Mineral Resources and Energy (DMRE)
- Development, Environment, Conservation and Tourism (DEDECT)
- North West Department of Human Settlement, Water and Sanitation (DHSWS)
- North West Department of Rural Development and Land Reform (NWDRDLR)
- South Africa Heritage Resource Agency (SAHRA) and/or North West Provincial Heritage Resource Authority (NWPHRA)
- North West Department of Agriculture, Forestry and Fisheries (DAFF)

Local authorities

- Rustenburg Local Municipality (including ward councillor)
- Bojanala Platinum District Municipality

Tribal authority

- Bapo Ba Mogale



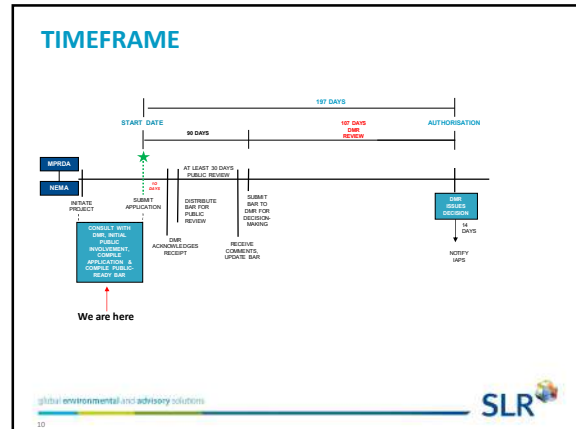
6

ENVIRONMENTAL BASELINE

Aspect	Description
Geology	Various lithologies of the Rustenburg Layered Suites of the Bushveld Igneous Complex
Topography	Gentle undulating plains and flat terrain to the north with semi-mountainous and rugged areas to the south. The local relief varies from about 1080 to 1290 metres above sea level.
Soils	Strongly structured black soils known as Calcic Vertisols and Lithic Leptosols. Calcic Vertisols have a very high clay content and are suitable for agriculture provided that there is plenty of rainfall or irrigation water.
Vegetation	Savanna Biome consisting of the Marikana Thornveld and the Norite Koppies Bushveld vegetation types. The prospecting right areas are classified as Critical Biodiversity Areas and an Ecological Support Areas and are considered an important habitat for vultures.
Surface Water	Located within the upper reaches of the A211 quaternary catchment of the Crocodile West. The prospecting areas are mostly dominated by non-perennial tributaries which periodically flows to the Tshukutswe and Kereespruit Rivers.
Heritage	Heritage resources identified within the prospecting right areas, including Motse (village) of Kgosi Mmamogole of the Bakwena Bamdǫgǫpa, a structure in Mmamogola village, a formal graveyard as well as a cave where several people were buried. These heritage resources are of high significance and are protected in terms of the National Heritage Resources Act (NHA) (No 25 of 1999).
Land use	Mixture of natural bushveld, agriculture, and granite quarrying.

SLR

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- ### POTENTIAL IMPACTS
- Loss of biodiversity and pre-mining land use if any residual contamination exists (considered unlikely) and if revegetation isn't successful (unknown).
 - Dust (if site is not appropriately rehabilitated).
 - Contractor loses social and economic benefits by not progressing with the prospecting, but assumed that contractor will find contracts elsewhere.
 - Resource becomes available for other potential prospectors.
- SLR

8

GENERAL DISCUSSION, COMMENTS AND QUERIES

SLR

11

- ### PUBLIC PARTICIPATION
- Hold focussed meetings with tribal authority, ward councilors, and the communities.
 - Pre-application meeting with the DMRE.
 - Place site notices on the boundary of PR areas and along the access roads.
 - Advertise in one local newspaper i.e. Brits Pos.
 - Distribution of BIDs via email to Interested and Affected Parties (I&APs) on database. Copies of the BID will be made available on the SLR data free website (at <https://slrconsulting.com/public-documents>)
 - The Basic Assessment Report (BAR) summary will be translated into Setswana and made available on the SLR data free website (at <https://slrconsulting.com/public-documents>)
 - Commenting authorities will receive electronic copies of the BARs to review and comment.
 - BARs will be available on SLR website and the data free website.
 - Notification to I&APs of DMR decision via email and SMS.
- SLR

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CLOSE

Project Manager and Public Participation Facilitator: Reinett Mogotshi

SLR Consulting (South Africa) (Pty) Ltd
 (011) 467 0945 (Tel) and/or (011) 467 0978 (Fax)
 Email: rmogotshi@slrconsulting.com

Thank you for your contribution.

SLR

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APPENDIX 2: ATTENDANCE REGISTER

Name and Surname	Community/organisation	Postal address	Contact numbers	E-mail
Reinett Mogotshi	SLR	PO Box 1596, Cramerview, 2060	0114670945	rmogotshi@slrconsulting.com
Webster Diale	Impala Platinum		0145696880	Webster.diale@implats.co.za
Victor Sibanda	Segwaelane	0521 E Segwaelane	0733423937	Sibandavic0182@gmail.com
Maria Mo	Segwaelane	9783 E Mshengoville	0837392876	Mariadasia4@gmail.com
Billy Molotsane	Segwaelane	0790 HH Mshengu	0791018931	Billymolatse2@gmail.com
Ntebo Matlou	Segwaelane	0022 J Mshengu	0721572996	
Martha Mokomele	Segwaelane	0231 B Dithabeng	0729637392	
Mabel Shotlang	Segwaelane	0243 B Mshengo	0818421832	Mshotlang45@gmail.com
Georgina Mosimango	Segwaelane	0576 E Marabi S	0727156890	
Martha Moerane	Segwaelane	0421 D Terminus	0735460418	

BID NOTIFICATION EMAIL

Reinett Mogotshi

From: Reinett Mogotshi
Sent: Sunday, 13 September 2020 19:09
To: Reinett Mogotshi
Subject: Wolvekraal Kareepoort Prospecting Right Closure: DMRE reference number: NW 30/5/1/1/2/1033 PR
Attachments: 2020-09-14 Wolvekraal Kareepoort BID_English V1.pdf; 2020-09-14 Wolvekraal Kareepoort BID_Tswana V1.pdf
Importance: High
Bcc: jm_tccba@yahoo.com; wphaladi@gmail.com; kgosi@bakwenabamogopa.org; wphaladi@gmail.com; kgosi@bakwenabamogopa.org; JKNkosi@ruraldevelopment.gov.za; hills@absamail.co.za; mjb@marlin.co.za; fanie@tombstoneafrica.co.za; Obakeng.lebethe@yahoo.com; lourensproniceurs@worldonline.co.za; bridget@eaglegranite.co.za; bruwerboerdery@gmail.com; Chris.Tshisevhe@dmr.gov.za; desmond.makamu@dmr.gov.za; Phumudzo.nethwadzi@dmr.gov.za; emahlangu@nwpg.gov.za; mmohlalisi@nwpg.gov.za; Inonkomo@nwpg.gov.za; ramashalal@dws.gov.za; ntshangases@dws.gov.za; pkrisjan@nwpg.gov.za; Matshidiso.Collins@drdlr.gov.za; pmahloko@nwpg.org.za; nhiggitt@sahra.org.za; mosianem@nwpg.gov.za; ddmogonediswa@nwpg.gov.za; katmogale@nwpg.gov.za; vanwykj@nwpg.gov.za; kmekgoe@rustenburg.gov.za; jamesm@bojanala.gov.za; ingridk@bojanala.gov.za; municipalmanager@bojanala.gov.za; mm@bojanala.gov.za; AmandaB@bojanala.gov.za; keabetswe.mothupi@drdlr.gov.za; miette@pea.org.za; lourensproniceurs@worldonline.co.za; kmekgoe@rustenburg.gov.za

Dear Interested and Affected Party

Afplats (Pty) Ltd (Afplats) holds a prospecting right on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ from the Department of Mineral Resources (now referred to as the Department of Mineral Resource and Energy). This prospecting right is referred to as the Wolvekraal Kareepoort prospecting right. The prospecting right area is approximately 16 km west of Brits within the Rustenburg Local Municipality and Bojanala Platinum District Municipality in the North West Province.

Between 2007 and 2014, Afplats undertook prospecting activities on the above-mentioned portions of the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled. Afplats is now planning to close its Wolvekraal Kareepoort prospecting right.

Prior to the proposed closure of the prospecting right, Imbasa will need to obtain environmental authorisation from the Department of Mineral Resources and Energy. In support of this, Afplats is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required. In this regard, the Environmental Impact Assessment Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Afplats (Pty) Ltd to manage the environmental assessment process.

The attached Background Information Document (BID) (in both English and Setswana) has been prepared to provide you with background information on the planned prospecting right closure and provide you with an opportunity to have input into the environmental assessment process. Copies of the BID are available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) or the data-free website (at <https://slrpublicdocs.datafree.co/public-documents/>).

Should you have any queries please contact SLR.





Thank you

EMAIL CORRESPONDENCE FOR DISTRIBUTION OF THE BID

Gugu Dhlamini

From: Reinett Mogotshi
Sent: Thursday, October 08, 2020 1:25 PM
To: Gugu Dhlamini
Subject: FW: WOLVEKRAAL KAREEPOORT PR CLOSURE
Attachments: image195040.png

Reinett Mogotshi Environmental Consultant

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 +27 11 467 0945
 +27 73 511 6696
 rmogotshi@slrconsulting.com

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Suite1 - Building D, Monte Circle
178 Montecasino Boulevard
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Johannesburg, 2191

From: Paula <plk2401@gmail.com>
Sent: Monday, 28 September 2020 16:07
To: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Subject: Re: WOLVEKRAAL KAREEPOORT PR CLOSURE

Good day Reinett

Thank you for the response.
Will await the updates.

Regards
PAULA

On Mon, Sep 28, 2020, 09:42 Reinett Mogotshi <rmogotshi@slrconsulting.com> wrote:

Hi Paula

Thank you for your email. I have added you to the project database for you to receive more information regarding the closure of the prospecting right.

Please note that the application in question is for closing of the prospecting right. This means that prospecting activities will no longer continue.

Many thanks,



Reinett Mogotshi
Environmental Consultant



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From: Paula <plk2401@gmail.com>
Sent: Wednesday, 16 September 2020 20:20
To: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Subject: WOLVEKRAAL KAREEPOORT PR CLOSURE

Good day Reinett

I'd like to enquire about the farming project.

I have started a fresh produce greenery which will later include garden centre in my yard in Segwaelane. I need assistance to acquire land so I can produce in bulk. My main focus is small root crops/ vegetables.

I'm interested in being part of this project and will appreciate more information please.

Kind regards

PAULA KANYANE





0799018711

Gugu Dhlamini

From: Reinett Mogotshi
Sent: Thursday, October 08, 2020 1:26 PM
To: Gugu Dhlamini
Subject: FW: WOLVEKRAAL KAREEPOORT PR CLOSURE

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I'm interested in being part of this project and will appreciate more information please.





Kind regards
PAULA KANYANE
0799018711

Gugu Dhlamini

From: Reinett Mogotshi
Sent: Thursday, October 08, 2020 1:26 PM
To: Gugu Dhlamini
Subject: FW: Wolvenkraal Kareepoort PR closure

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From: Kahmani Gounden <kahmanig@gmail.com>
Sent: Monday, 14 September 2020 10:24
To: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Subject: Wolvenkraal Kareepoort PR closure

Good Day

Can you please register me as an I&AP for the above mentioned project.





I am an interested party,
Name: Kahmani Gounden
Email Address: kahmanig@gmail.com
Contact Number: 0718917114

Kind Regards
Kahmani

Gugu Dhlamini

From: Reinett Mogotshi
Sent: Thursday, October 08, 2020 1:26 PM
To: Gugu Dhlamini
Subject: FW: Wolvekraal Kareepoort Prospecting Right Closure: DMRE reference number: NW 30/5/1/1/2/1033 PR

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From: Natasha Higgitt <nhiggitt@sahra.org.za>
Sent: Monday, 14 September 2020 08:57
To: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Subject: RE: Wolvekraal Kareepoort Prospecting Right Closure: DMRE reference number: NW 30/5/1/1/2/1033 PR

Good morning,

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.

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.

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.

From: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Sent: Sunday, 13 September 2020 19:09
To: Reinett Mogotshi <rmogotshi@slrconsulting.com>
Subject: Wolvekraal Kareepoort Prospecting Right Closure: DMRE reference number: NW 30/5/1/1/2/1033 PR
Importance: High

Dear Interested and Affected Party

Afplats (Pty) Ltd (Afplats) holds a prospecting right on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ from the Department of Mineral Resources (now referred to as the Department of Mineral

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Should you have any queries please contact SLR.

Thank you



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Natasha Higgitt

Heritage Officer: Archaeology, Palaeontology and Meteorites Unit

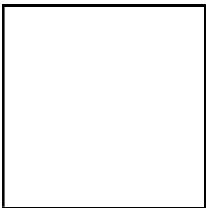
South African Heritage Resources Agency

- A nation united through heritage -

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APPENDIX D: RISK ASSESSMENT CRITERIA

Both the criteria used to assess the impacts and the method of determining the significance of the impacts is outlined below. This method complies with the method provided in the EIA guideline document. Part A provides the approach for determining impact consequence (combining intensity, extent and duration). Impact consequence and significance are determined from Part B and C. The consequence rating is considered together with the probability of occurrence in order to determine the overall significance of each impact. The interpretation of the impact significance is given in Part D. The significance of the impact can be related to the level of risk associated with a specific issue.

IMPACT ASSESSMENT METHODOLOGY

PART A: DEFINITIONS AND CRITERIA*		
Definition of SIGNIFICANCE	Significance = consequence x probability	
Definition of CONSEQUENCE	Consequence is a function of intensity, spatial extent and duration	
Criteria for ranking of the INTENSITY of environmental impacts	VH	Severe change, disturbance or degradation. Associated with severe consequences. May result in severe illness, injury or death. Targets, limits and thresholds of concern continually exceeded. Substantial intervention will be required. Vigorous/widespread community mobilization against project can be expected. May result in legal action if impact occurs.
	H	Prominent change, disturbance or degradation. Associated with real and substantial consequences. May result in illness or injury. Targets, limits and thresholds of concern regularly exceeded. Will definitely require intervention. Threats of community action. Regular complaints can be expected when the impact takes place.
	M	Moderate change, disturbance or discomfort. Associated with real but not substantial consequences. Targets, limits and thresholds of concern may occasionally be exceeded. Likely to require some intervention. Occasional complaints can be expected.
	L	Minor (Slight) change, disturbance or nuisance. Associated with minor consequences or deterioration. Targets, limits and thresholds of concern rarely exceeded. Require only minor interventions or clean-up actions. Sporadic complaints could be expected.
	VL	Negligible change, disturbance or nuisance. Associated with very minor consequences or deterioration. Targets, limits and thresholds of concern never exceeded. No interventions or clean-up actions required. No complaints anticipated.
	VL+	Negligible change or improvement. Almost no benefits. Change not measurable/will remain in the current range.
	L+	Minor change or improvement. Minor benefits. Change not measurable/will remain in the current range. Few people will experience benefits.
	M+	Moderate change or improvement. Real but not substantial benefits. Will be within or marginally better than the current conditions. Small number of people will experience benefits.
	H+	Prominent change or improvement. Real and substantial benefits. Will be better than current conditions. Many people will experience benefits. General community support.
	VH+	Substantial, large-scale change or improvement. Considerable and widespread benefit. Will be much better than the current conditions. Favourable publicity and/or widespread support expected.
Criteria for ranking the DURATION of impacts	VL	Very short, always less than a year. Quickly reversible
	L	Short-term, occurs for more than 1 but less than 5 years. Reversible over time.
	M	Medium-term, 5 to 10 years.
	H	Long term, between 10 and 20 years. (Likely to cease at the end of the operational life of the activity)
	VH	Very long, permanent, +20 years (Irreversible. Beyond closure)
Criteria for ranking the EXTENT of impacts	VL	A part of the site/property.
	L	Whole site.
	M	Beyond the site boundary, affecting immediate neighbours
	H	Local area, extending far beyond site boundary.
	VH	Regional/National

PART B: DETERMINING CONSEQUENCE							
INTENSITY = VL							
DURATION	Very long	VH	Low	Low	Medium	Medium	Medium
	Long term	H	Low	Low	Low	Medium	Medium
	Medium term	M	Very Low	Low	Low	Low	Medium
	Short term	L	Very low	Very Low	Low	Low	Low

	Very short	VL	Very low	Very Low	Very Low	Low	Low
--	------------	-----------	-----------------	-----------------	-----------------	------------	------------

INTENSITY = L							
DURATION	Very long	VH	Medium	Medium	Medium		
	Long term	H	Low	Medium	Medium	Medium	
	Medium term	M	Low	Low	Medium	Medium	Medium
	Short term	L	Low	Low	Low	Medium	Medium
	Very short	VL	Very low	Low	Low	Low	Medium
INTENSITY = M							
DURATION	Very long	VH	Medium				
	Long term	H	Medium	Medium	Medium		
	Medium term	M	Medium	Medium	Medium		
	Short term	L	Low	Medium	Medium	Medium	
	Very short	VL	Low	Low	Low	Medium	Medium
INTENSITY = H							
DURATION	Very long	VH					
	Long term	H	Medium				
	Medium term	M	Medium	Medium			
	Short term	L	Medium	Medium	Medium		
	Very short	VL	Low	Medium	Medium	Medium	
INTENSITY = VH							
DURATION	Very long	VH					
	Long term	H					
	Medium term	M	Medium				
	Short term	L	Medium	Medium			
	Very short	VL	Low	Medium	Medium		

VL	L	M	H	VH
A part of the site/ property	Whole site	Beyond the site, affecting neighbours	Extending far beyond site but localised	Regional/ National
EXTENT				

PART C: DETERMINING SIGNIFICANCE							
PROBABILITY (of exposure to impacts)	Definite/ Continuous	VH	Very Low	Low	Medium		
	Probable	H	Very Low	Low	Medium		
	Possible/ frequent	M	Very Low	Very Low	Low	Medium	
	Conceivable	L	Insignificant	Very Low	Low	Medium	
	Unlikely/ improbable	VL	Insignificant	Insignificant	Very Low	Low	Medium
			VL	L	M	H	VVH
CONSEQUENCE							

PART D: INTERPRETATION OF SIGNIFICANCE	
Significance	Decision guideline
Very High	Potential fatal flaw unless mitigated to lower significance.
High	It must have an influence on the decision. Substantial mitigation will be required.
Medium	It should have an influence on the decision. Mitigation will be required.
Low	Unlikely that it will have a real influence on the decision. Limited mitigation is likely required.
Very Low	It will not have an influence on the decision. Does not require any mitigation
Insignificant	Inconsequential, not requiring any consideration.

*VH = very high, H = high, M= medium, L= low and VL= very low and + denotes a positive impact.

APPENDIX E: DETAILED EMPR PERFORMANCE ASSESSMENT PROCEDURE

APPENDIX A: AUDIT PROCEDURE

AUDIT PROCEDURE		
Stage	Step	Detail
Pre-assessment	Clarify the assessment objectives and criteria	The assumed objectives and criteria are presented in the main body of the report.
	Define the scope of the assessment	<p>The client is: Afplats (Pty) Ltd.</p> <p>The “auditee” is:</p> <ul style="list-style-type: none"> • Wolwekraal 408 JQ and Kareepoort 407 JQ Prospecting operations <p>Assumed key performance areas are: environmental management as defined in Sections F and G of the standard environmental management plan (EMP) report.</p>

CORRESPONDING SCHEDULE	
Weeks	Activities
0	<p>Preparation</p> <ul style="list-style-type: none"> • Check and refine assessment objectives and criteria. • Make preliminary logistical arrangements for the meetings and site visits. <p>Review of relevant information</p> <ul style="list-style-type: none"> • Commence with review of relevant information.
1	<p>Pre-assessment meeting with relevant Managers</p> <ul style="list-style-type: none"> • Pre-assessment meeting with managers to confirm objectives and criteria and logistical arrangements. • Finalise assessment plan. <p>Orientation site visit</p> <ul style="list-style-type: none"> • Brief orientation site visit for assessment team members. • Collect outstanding information for review. <p>Review of relevant information</p> <ul style="list-style-type: none"> • Continue review of relevant information.

AUDIT PROCEDURE		
Stage	Step	Detail
	Review available information	The information listed below needs to be reviewed. <ul style="list-style-type: none"> • EMP report • DME letter of approval • Site layout • Specialist reports • Correspondence from the public • Monitoring records and reports • Other environmental approvals, if applicable
	Planning	Make logistical arrangements for the assessment.

CORRESPONDING SCHEDULE	
Weeks	Activities

AUDIT PROCEDURE		
Stage	Step	Detail
Assessment process at each operational unit	Opening meeting	The purpose of the meeting is outlined below. <ul style="list-style-type: none"> Present the assessment aims, objectives and criteria to operations management. Confirm logistical arrangements the assessment.
	Collection of assessment evidence	This will involve interviews with staff members, verification of statements on site, review of available monitoring data and environmental management system documentation.
	Conclusions	The assessment conclusions will be directly linked to the assessment objectives.
	Closing meeting	The preliminary assessment findings and conclusions will be presented and discussed with operations management.
Reporting	First draft	Submit the draft report to operational unit for review and comment.
	Final report	Submit the final report to relevant Managers.

CORRESPONDING SCHEDULE	
Weeks	Activities
1	Assessment <ul style="list-style-type: none"> Opening meeting. Collection of assessment evidence. Processing of assessment evidence to draw assessment conclusions. Preparation for the closing meeting. Closing meeting. Begin compilation of the assessment report. Planning meeting with assessment team (to make arrangements for completion of the report).
2	Reporting <p>The final report will be submitted in June 2016.</p>

EMP COMMITMENTS

EMP COMMITMENTS	
F 1	GENERAL REQUIREMENTS
F 1.1	MAPPING AND SETTING OUT
F 1.1.1	LAYOUT PLAN
	A copy of the layout plan as provided for in Regulation 2.2 must be available at the prospecting/mining site for scrutiny when required. Plan must show co-ordinates of the area being applied for; north point; scale; name, number and location of the area covered by the application; size and shape of area; boundaries of area; layout of operations; surface structures and servitudes; and topography of the land.
	The plan must be updated on a regular basis with regard to the actual progress of the establishment of surface infrastructure, mining operations and rehabilitation (a copy of the updated plan shall be forwarded to the Regional Manager on a regular basis).
	A final layout plan must be submitted at closure of the mine or when operations have ceased.
F 1.1.2	DEMARCATING THE MINING/ PROSPECTING AREA
	The mining/ prospecting area must be clearly demarcated by means of beacons at its corners, and along its boundaries if there is no visibility between the corner beacons.
	Permanent beacons as indicated on the layout plan or as prescribed by the Regional Manager must be firmly erected and maintained in their correct position throughout the life of the operation.
	Mining/ prospecting and resultant operations shall only take place within this demarcated area.
F 1.1.3	DEMARCATING THE RIVER CHANNEL AND RIVERINE ENVIRONMENT
	The following is applicable if operations are conducted within the riverine environment (See F 3.2):
	Beacons as indicated on the layout plan or as prescribed by the Regional Manager must be erected and maintained in their correct position throughout the life of the operation.
	These beacons must be of a permanent nature during the operations and must not be easily removable, especially those in a river channel. The beacons must, however, be removed at the end of the operations.
	The mining of and prospecting for any mineral shall only take place within this demarcated mining area.
	If riverine vegetation is present in the form of reeds or wetland vegetation, the presence of these areas must be entered in Part C 1.45 of the EMPlan and indicated on the layout plan.
	The holder of the mining permit/ prospecting right will also be required to permanently demarcate the areas as specified in F 1.1.2.
F 1.2	RESTRICTIONS ON MINING/ PROSPECTING
	On assessment of the application, the Regional Manager may prohibit the conducting of mining or prospecting operations in vegetated areas or over portions of these areas
	In the case of areas that are excluded from mining or prospecting, no operations shall be conducted within 5 m of these areas.

EMP COMMITMENTS
F 1.3 RESPONSIBILITY
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.
It is the responsibility of the holder of the mining permit/ prospecting right to ensure that the manager on the site and the employees are capable of complying with all the statutory requirements which must be met in order to mine, which includes the implementation of this EMP.
If operations are to be conducted in an area that has already been disturbed, the holder must reach specific agreement with the Regional Manager concerning the responsibilities imposed upon himself/herself pertaining to the rehabilitation of the area and the pollution control measures to be implemented.
F 2 INFRASTRUCTURAL REQUIREMENTS
F 2.1 TOPSOIL
Topsoil shall be removed from all areas where physical disturbance of the surface will occur.
All available topsoil shall be removed after consultation with the Regional Manager prior to the commencement of any operations.
The topsoil removed, shall be stored in a bund wall on the high ground side of the mining/prospecting area outside the 1:50 flood level within the boundaries of the mining area/ prospecting.
Topsoil shall be kept separate from overburden and shall not be used for building or maintenance of access roads.
The topsoil stored in the bund wall shall be adequately protected from being blown away or being eroded.
F 2.2 ACCESS TO THE SITE
F 2.2.1 ESTABLISHING ACCESS ROADS ON THE SITE
The access road to the mining/prospecting area and the camp-site/site office must be established in consultation with the landowner/tenant and existing roads shall be used as far as practicable.
In the case of geological or soil sampling, mobile drilling (short term operation), existing tracks and roads shall be used where practicable.
Should a portion of the access road be newly constructed the following must be adhered to:
The route shall be selected that a minimum number of bushes or trees are felled and existing fence lines shall be followed as far as possible.
Water courses and steep gradients shall be avoided as far as is practicable.
Adequate drainage and erosion protection in the form of cut-off berms or trenches shall be provided where necessary.
Add 1
If imported material is used in the construction or upgrading of the access road this must be listed in C 2.17
The erection of gates in fence lines and the open or closed status of gates in new and existing positions shall be clarified in consultation with the landowner/tenant and maintained throughout the operational period.

EMP COMMITMENTS
No other routes will be used by vehicles or personnel for the purpose of gaining access to the site.
NOTE: The design, construction and location of access to provincial roads must be in accordance with the requirements laid down by the Provincial or controlling authority.
F 2.2.2 MAINTENANCE OF ACCESS ROADS
In the case of dual or multiple use of access roads by other users, arrangements for multiple responsibility must be made with the other users. If not, the maintenance of access roads will be the responsibility of the holder of the mining permit/ prospecting right.
Newly constructed access roads shall be adequately maintained so as to minimise dust, erosion or undue surface damage.
F 2.2.3 DUST CONTROL ON THE ACCESS AND HAUL ROADS
The liberation of dust into the surrounding environment shall be effectively controlled by the use of, inter alia, water spraying and/or other dust-allaying agents. The speed of haul trucks and other vehicles must be strictly controlled to avoid dangerous conditions, excessive dust or excessive deterioration of the road being used.
F 2.2.4 REHABILITATION OF ACCESS ROADS
Whenever a mining permit/ prospecting right is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit or right, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to the satisfaction of the Regional Manager.
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.
F 2.3 OFFICE/CAMP SITES
F 2.3.1 ESTABLISHING OFFICE / CAMP SITES
Office and camp sites shall be established, as far as is practicable, outside the flood plain, above the 1 in 50 flood level mark within the boundaries of the mining/ prospecting area.
The area chosen for these purposes shall be the minimum reasonably required and which will involve the least disturbance to vegetation. Topsoil shall be handled as described in F 2.1 above
No camp or office site shall be located closer than 100 metres from a stream, river, spring, dam or pan.
No trees or shrubs will be felled or damaged for the purpose of obtaining firewood, unless agreed to by the landowner/tenant.
Fires will only be allowed in facilities or equipment specially constructed for this purpose. If required by applicable legislation, a fire-break shall be cleared around the perimeter of the camp and office sites.
Lighting and noise disturbance or any other form of disturbance that may have an effect on the landowner/tenant/persons lawfully living in the vicinity shall be kept to a minimum.
F 2.3.2 TOILET FACILITIES, WASTE WATER AND REFUSE DISPOSAL
As a minimum requirement, the holder of a mining permit/ prospecting right shall, at least, provide pit latrines for employees and proper hygiene measures shall be established.

EMP COMMITMENTS
Chemical toilet facilities or other approved toilet facilities such as a septic drain shall preferably be used and sited on the camp site in such a way that they do not cause water or other pollution.
The use of existing facilities must take place in consultation with the landowner/tenant.
In cases where facilities are linked to existing sewerage structures, all necessary regulatory requirements concerning construction and maintenance should be adhered to.
All effluent water from the camp washing facility shall be disposed of in a properly constructed French drain, situated as far as possible, but not less than 200 metres, from any stream, river, pan, dam or borehole.
Only domestic type wash water shall be allowed to enter this drain and any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognised facility.
Spills should be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.
Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., shall be stored in a container at a collecting point and collected on a regular basis and disposed of at a recognised disposal facility. Specific precautions shall be taken to prevent refuse from being dumped on or in the vicinity of the camp site.
Biodegradable refuse generated from the office/camp site, processing areas vehicle yard, storage area or any other area shall either be handled as indicated above or be buried in a pit excavated for that purpose and covered with layers of soil, incorporating a final 0,5 metre thick layer of topsoil (where practicable). Provision should be made for future subsidence of the covering.
F 2.3.3 REHABILITATION OF THE OFFICE/CAMP SITE
On completion of operations, all buildings, structures or objects on the camp/office site shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), which states: (1) When a prospecting right, mining right, retention permit or mining permit lapses, is cancelled or is abandoned or when any prospecting or mining operation comes to an end, the holder of any such right or permit may not demolish or remove any building, structure, object - (a) which may not be demolished in terms of any other law; (b) which has been identified in writing by the Minister for purposes of this section; or (c) which is to be retained in terms of an agreement between the holder and the owner or occupier of the land, which agreement has been approved by the Minister in writing. (2) The provision of subsection (1) does not apply to bona fide mining equipment which may be removed.
Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped.
Areas containing French drains shall be compacted and covered with a final layer of topsoil to a height of 10cm above the surrounding ground surface.
The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.
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 vegetation seed mix to his or her specification.
Photographs of the camp and office sites, before and during the mining/ prospecting operation and after rehabilitation, shall be taken at selected fixed points and kept on record for the information of the Regional Manager.

EMP COMMITMENTS	
F 2.4	VEHICLE MAINTENANCE YARD AND SECURED STORAGE AREAS
F 2.4.1	ESTABLISHING THE VEHICLE MAINTENANCE YARD AND SECURED STORAGE AREAS
	The vehicle maintenance yard and secured storage area will be established as far as is practicable, outside the flood plain, above the 1 in 50 flood level mark within the boundaries of the mining/prospecting area.
	The area chosen for these purposes shall be the minimum reasonably required and involve the least disturbance to tree and plant life. Topsoil shall be handled as described in F 2.1 above.
	The storage area shall be securely fenced and all hazardous substances and stocks such as diesel, oils, detergents, etc., shall be stored therein. Drip pans, a thin concrete slab or a facility with PVC lining, shall be installed in such storage areas with a view to prevent soil and water pollution.
	The location of both the vehicle maintenance yard and the storage areas are to be indicated on the layout plan.
	No vehicle may be extensively repaired in any place other than in the maintenance yard.
F 2.4.2	MAINTENANCE OF VEHICLES AND EQUIPMENT
	The maintenance of vehicles and equipment used for any purpose during the mining/prospecting operation will take place only in the maintenance yard area.
	Equipment used in the mining/prospecting process must be adequately maintained so that during operations it does not spill oil, diesel, fuel, or hydraulic fluid.
	Machinery or equipment used on the mining/prospecting area must not constitute a pollution hazard in respect of the above substances. The Regional Manager shall order such equipment to be repaired or withdrawn from use if he or she considers the equipment or machinery to be polluting and irreparable.
F 2.4.3	WASTE DISPOSAL
	Suitable covered receptacles shall be available at all times and conveniently placed for the disposal of waste.
	All used oils, grease or hydraulic fluids shall be placed therein and these receptacles will be removed from the site on a regular basis for disposal at a registered or licensed disposal facility.
	All spills should be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.
	On completion of mining/prospecting operations, the above areas shall be cleared of any contaminated soil, which must be dumped as referred to in section F 2.4.3 above.
	All buildings, structures or objects on the vehicle maintenance yard and secured storage areas shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002.
	The surface shall then be ripped or ploughed to a depth of at least 300mm and the topsoil previously stored adjacent the site, shall be spread evenly to its original depth over the whole area. The area shall then be fertilised if necessary (based on a soil analysis).
	The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.
	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 his or her specification.

EMP COMMITMENTS	
F 3	GENERAL OPERATING PROCEDURES IN THE PROSPECTING AREA
F 3.1	LIMITATIONS ON MINING/PROSPECTING
	The mining of or prospecting for precious stones shall take place only within the approved demarcated mining or prospecting area.
	Mining/ prospecting may be limited to the areas indicated by the Regional Manager on assessment of the application.
	The holder of the mining permit/ prospecting right shall ensure that operations take place only in the demarcated areas as described in section F 1.1.2 above.
	Operations will not be conducted closer than one and a half times the height of the bank from the edge of the river channel and in such manner that the stability of the bank of the river is affected.
	Precautions shall also be taken to ensure that the bank of the river is adequately protected from scouring or erosion. Damage to the bank of the river caused by the operations, shall be rehabilitated to a condition acceptable to the Regional Manager at the expense of the holder.
	Restrictions on the disturbance of riverine vegetation in the form of reeds or wetland vegetation must be adhered to. The presence of these areas must be entered in Part of the programme and indicated on the layout plan.
F 3.2	MINING/ PROSPECTING OPERATIONS WITHIN THE RIVERINE ENVIRONMENT
	<i>NOTE: The Department of Water Affairs and Forestry may impose additional conditions which must be attached to this EMP. In this regard, please see the Best Practice Guideline for small scale mining developed by DWAF (BPG 2.1) (available from http://www.dwaf.gov.za)</i>
	The mining of or prospecting for precious stones in the river or the banks of the river will be undertaken only after the Regional Manager has consulted with the Department of Water Affairs and Forestry.
	The canalisation of a river will not be undertaken unless the necessary permission has been obtained from the Department of Water Affairs and Forestry. Over and above the conditions imposed by the said Department, which conditions shall form part of this EMPlan, the following will also apply: The canalisation of the flow of the river over different parts of the river bed shall be constructed in such a manner that the following are adhered to at all times: The flow of the river may not be impeded in any way and damming upstream may not occur. The canalisation of the flow may not result in scouring or erosion of the river-bank. Well points or extraction pumps in use by other riparian users may not be interfered with and canalisation may not impede the extraction of water at these points.
	Access to the riverbed for the purpose of conducting excavations in the river-bed, shall be through the use of only one access at a time. The location of the access to the river channel across the river-bank shall be at a point of the river-bank where the least excavation and damage to vegetation will occur and shall not be wider than is reasonably required. The position of the river access together with all planned future access points, must be indicated on the layout plan.
F 3.2.1	REHABILITATION OF ACCESS TO RIVER-BED
	When rehabilitating the access point, the original profile of the river-bank will be re-established by backfilling the access point with the original material excavated or other suitable material.
	The topsoil shall then be returned over the whole area to its original depth and if necessary fertilised and the vegetation allowed to grow.

EMP COMMITMENTS
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 his or her specification.
In the event of damage from an occurrence where high flood waters scour and erode access points in the process of rehabilitation over the river-bank or an access point currently in use, repair of such damage shall be the sole responsibility of the holder of the mining permit or prospecting right.
Repair to the river-bank to reinstate its original profile to the satisfaction of the Regional Manager must take place immediately after such event has occurred and the river has subsided to a point where repairs can be undertaken.
Final acceptance of rehabilitated river access points will be awarded only after the vegetation has re-established to a point where the Regional Manager is satisfied that the river-bank is stable and that the measures installed are of durable nature and able to withstand high river-flow conditions.
F 3.2.2 REHABILITATION OF MINING/PROSPECTING AREA IN THE BED OF THE RIVER
The goal of rehabilitation with respect to the area where mining/prospecting has taken place in the river-bed is to leave the area level and even, and in a natural state containing no foreign debris or other materials and to ensure the hydrological integrity of the river by not attenuating or diverting any of the natural flow.
All scrap and other foreign materials will be removed from the bed of the river and disposed of as in the case of other refuse (see section F 2.3.2 above), whether these accrue directly from the mining/prospecting operation or are washed on to the site from upstream.
Removal of these materials shall be done on a continuous basis and not only at the start of rehabilitation.
Where reeds or other riverine vegetation have been removed from areas, these shall be re-established systematically in the approximate areas where they occurred before mining/prospecting.
An effective control programme for the eradication of invader species and other exotic plants, shall be instituted on a regular basis over the entire mining/prospecting area under the control of the holder of the mining permit/ prospecting right, both during mining/prospecting and at the stage of final rehabilitation.
THE WATER USE LICENCE
The National Water Act, (Act 36 of 1998), is based on the principles of sustainability, efficiency and equity, meaning that the protection of water resources must be balanced with their development and use.
In addition to being issued with a prospecting right or mining permit a small-scale miner may also need to get a water use licence for the proposed water uses that will take place, except in certain cases.
NOTE: The Department of Water Affairs and Forestry (DWAF) developed specific Best Practice Guideline for small scale mining that relates to stormwater management, erosion and sediment control and waste management. Copies of these guidelines can be obtained from the regional office of DME or DWAF.
Applications for a water use licence must be made in good time, such that approval can be granted before a water use activity can begin. The appropriate licence forms for each kind of expected water use should be completed together with supporting documentation. The main supporting document required is a technical report. To make the technical report easier, you can refer to sections in this EMPlan, as most of what the technical report requires has already been done in the EMPlan. If you refer to the EMPlan it must be attached to the technical report.

EMP COMMITMENTS
F 3.3 EXCAVATIONS
F 3.3.1 ESTABLISHING THE EXCAVATION AREAS
Whenever any excavation is undertaken for the purpose of locating and/or extracting ore bodies of all types of minerals, including precious stone-bearing gravels, the following operating procedures shall be adhered to: Topsoil shall, in all cases (except when excavations are made in the river-bed), be handled as described in F 2.1 above. Excavations shall take place only within the approved demarcated mining/prospecting area. Overburden rocks and coarse material shall be placed concurrently in the excavations or stored adjacent to the excavation, if practicable, to be used as backfill material once the ore or gravel has been excavated. Trenches shall be backfilled immediately if no ore or precious stone-bearing gravel can be located.
F 3.3.2 REHABILITATION OF EXCAVATION AREAS
The following operating procedures shall be adhered to: The excavated area must serve as a final depositing area for the placement of tailings during processing. Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings. Waste, as described in paragraph F 2.3.2 above, will not be permitted to be deposited in the excavations. Once excavations have been refilled with overburden, rocks and coarse natural materials and profiled with acceptable contours and erosion control measures, the topsoil previously stored, shall be returned to its original depth over the area. The area shall be fertilised if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local or adapted indigenous seed mix in order to propagate the locally or regionally occurring flora. 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 vegetation seed mix to his or her specification.
F 3.4 PROCESSING AREAS AND WASTE PILES (DUMPS)
F 3.4.1 ESTABLISHING PROCESSING AREAS AND WASTE PILES
Processing areas and waste piles shall not be established within 100 metres of the edge of any river channel or other water bodies. Processing areas should be established, as far as practicable, near the edge of excavations to allow the waste, gravel and coarse material to be processed therein. The areas chosen for this purpose shall be the minimum reasonably required and involve the least disturbance to vegetation. Prior to development of these areas, the topsoil shall be removed and stored as described in paragraph F 2.1 above. The location and dimensions of the areas are to be indicated on the layout plan and once established, the processing of ore containing precious stones shall be confined to these areas and no stockpiling or processing will be permitted on areas not correctly prepared. Tailings from the extraction process must be so treated and/or deposited that it will in no way prevent or delay the rehabilitation process
F 3.4.2 REHABILITATION OF PROCESSING AREAS
Coarse natural material used for the construction of ramps must be removed and dumped into the excavations.

EMP COMMITMENTS
On completion of mining/prospecting operations, the surface of the processing areas especially if compacted due to hauling and dumping operations, shall be scarified to a depth of at least 300mm and graded to an even surface condition and the previously stored topsoil will be returned to its original depth over the area.
Prior to replacing the topsoil the material that was removed from the processing area will be replaced in the same order as it originally occurred.
The area shall then be fertilised if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local, adapted indigenous seed mix.
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 his or her specification.
F 3.5 TAILINGS DAM(S) (SLIMES DAM)
The permission of the Regional Manager must be obtained should a tailings dam be constructed for the purpose of handling the tailings of the mining/prospecting operations. The construction, care and maintenance of tailings dams have been regulated and the relevant regulation is copied herewith, both for your information and as a guideline to the commissioning, management, operation, closing and aftercare of a tailings deposition facility.
If applicable, see Regulation 73 of MPRDA for specific requirements.
F 3.6 FINAL REHABILITATION
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.
Final rehabilitation shall be completed within a period specified by the Regional Manager.
F.4 MONITORING AND REPORTING
F 4.1 INSPECTIONS AND MONITORING
Regular monitoring of all the environmental management measures and components shall be carried out by the holder of the prospecting right, mining permit or reconnaissance permission in order to ensure that the provisions of this programme are adhered to.
Ongoing and regular reporting of the progress of implementation of this programme will be done.
Various points of compliance will be identified with regard to the various impacts that the operations will have on the environment.
Inspections and monitoring shall be carried out on both the implementation of the programme and the impact on plant and animal life.
Visual inspections on erosion and physical pollution shall be carried out on a regular basis.
F 4.2 COMPLIANCE REPORTING / SUBMISSION OF INFORMATION
Layout plans will be updated on a regular basis and updated copies will be submitted on a biannual basis to the Regional Manager
Reports confirming compliance with various points identified in the environmental management programme will be submitted to the Regional Manager on a regular basis and as decided by the said manager.
Any emergency or unforeseen impact will be reported as soon as possible.

EMP COMMITMENTS
An assessment of environmental impacts that were not properly addressed or were unknown when the programme was compiled shall be carried out and added as a corrective action.
F 5 CLOSURE
F 5.1 ENVIRONMENTAL RISK REPORT
When the holder of a prospecting right, mining permit or reconnaissance permission intends closing down his/her operations, an environmental risk report shall accompany the application for closure. The requirements of such a risk report is contained in Regulation 60 of the Regulations promulgated in terms of the Act.
F 5.2 CLOSURE OBJECTIVES
Closure objectives form part of this EMPlan and must- (a) identify the key objectives for mine closure to guide the project design, development and management of environmental objectives; (b) provide broad future land use objective(s) for the site; and (c) provide proposed closure cost.
F 5.3 CONTENTS OF CLOSURE PLAN
See EMP commitments for contents of closure plan
F 5.4 TRANSFER OF ENVIRONMENTAL LIABILITIES TO A COMPETENT PERSON
Should the holder of a prospecting right, mining permit or reconnaissance permission wish to transfer any environmental liabilities and responsibilities to another person or persons, the following will pertain: (1) An application to transfer environmental liabilities to a competent person in terms of section 48) of the Act, must be completed on Form O as set out in Annexure 1 to the Regulations and be lodged to the Minister for consideration. (2) The holder of a prospecting right, mining right or mining permit may transfer liabilities and responsibilities as identified in the environmental management plan and the required closure plan to a competent person as contemplated in Regulation 58. (3) When considering the transfer of environmental liabilities and responsibilities in terms of section 48) of the Act, the Minister must consult with any State department which administers any law relating to matters affecting the environment. (4) No transfer of environmental liabilities and responsibilities to a competent person may be made unless the Chief Inspector of Mines and the Department of Water Affairs and Forestry have confirmed in writing that the person to whom the liabilities and responsibilities is transferred to, have the necessary qualifications pertaining to health and safety and management of potential pollution of water resources.

- (a) identify the key objectives for mine closure to guide the project design, development and management of environmental objectives;
- (b) provide broad future land use objective(s) for the site; and
- (c) provide proposed closure cost.

EMP COMMITMENTS

F 5.5 NOTES ON LEGAL PROVISIONS
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<p>NOTE:</p> <p>The holder of a prospecting right, mining permit or reconnaissance permission must also take cognisance of the provisions of other legislation dealing with matters relating to conservation, and which include, inter alia, the following:</p> <ul style="list-style-type: none"> * National Monuments Act, 1969 (Act 28 of 1969). * National Parks Act, 1976 (Act 57 of 1976) * Environmental Conservation Act, 1989 (Act 73 of 1989) * National Environmental Management Act, 1998 (Act No. 107 of 1998) * Atmospheric Pollution Prevention Act, 1965 (Act 45 of 1965) * The National Water Act, 1998 (Act 36 of 1998) * Mine Safety and Health Act, 1996 (Act 29 of 1996) * The Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983).
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SECTION G OF EMP – ADDITIONAL COMMITMENTS

SECTION G: SPECIFIC ADDITIONAL REQUIREMENTS DETERMINED BY THE REGIONAL MANAGER

No additional commitments were included in Section G of the EMP.
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CONDITIONS IN DMR APPROVAL LETTER
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All mining activities must take place in accordance with the approved EMP.
No mining activities are allowed within 1:50 year flood line or 100m from the edge of the river whatever is the greatest, without the necessary authorization from DWAF.
No mining infrastructure is allowed to be constructed within the 1:100 year flood line without the necessary authorization from DWAF.
Afplats (Pty) Ltd is responsible for all surface disturbances on the mining area, which includes all historical mining activities.
All available topsoil must be stripped and stockpiled separately prior to any surface disturbance.
All mine waste must be taken back to the excavation area for backfilling purposes.
No mine waste will be allowed to be deposited in natural drainage lines or erosion gullies.

No dump structures must be left on the surface, this includes topsoil stockpiles, overburden stockpiles, waste rock stockpiles, tailings dumps and slimes dams.
All excavations must be backfilled to the natural surface level, if a bulk factor exists it must be accommodated on the total area of disturbance.
A surveyed plan must be submitted every year to the Regional Manager that indicates: <ul style="list-style-type: none"> - the positions, footprints and volumes of all topsoil stockpiles, overburden dumps, waste rock dumps and slimes dams (any structure that is above the natural surface) - the positions, surface areas and depths of all open pits. - the positions and surface area of all rehabilitated areas (please indicate the status of rehabilitation-backfilled, profiled/landscaped, topsoiled, vegetated or monitoring and managing).
The rehabilitation fund must be upgraded or revised on an annual basis according to the surveyed plan, which indicates the progress in rehabilitation.
Any project expansions or additional infrastructure must be addressed through an addendum and submitted to the Director: Mineral Development for his approval before they commence.
This approval may be amended at any stage if deemed necessary.
This approval does not purport to absolve your company from its common law obligations towards the surface rights holder or any other affected party.
The following Acts are applicable and relevant to the said approval and your company is to familiarise itself with the provisions in so far as they apply to the company's operations: <ul style="list-style-type: none"> - The National Water Act 1998, (Act 36 of 1998), with particular reference to the sections pertaining to mining or prospecting in the proximity of dams and their catchment areas, rivers, marshes, streams, pans and other water resources. - The Environmental Conservation Act (Act 73 of 1989). Your attention is specifically directed to the requirements of Section 20 of the above-mentioned Act. - The Atmospheric Pollution Prevention Act, 1965 (Act 45 of 1965), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by mining activities, into the atmosphere. - The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular reference to the sections pertaining to soil conservation. - The National Heritage Resources Act (Act No 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains. - The Mine Health and Safety Act (Act 26 of 1996) in conjunction with the Minerals Act (Act 50 of 1991), with particular reference to those sections and regulations pertaining to health and safety at mines; mining within 100m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.
All persons concerned must be made fully conversant with the terms of this approval, copies of which must be readily available to them.

APPENDIX F: CLOSURE FORM P



DEPARTMENT: MINERALS AND ENERGY
REPUBLIC OF SOUTH AFRICA

APPLICATION FOR CLOSURE CERTIFICATE

[in terms of section 43(3) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)]

Note:

The application is to be made within 180 days of lapsing, abandonment, cancellation, cessation, relinquishment or rehabilitation completed in terms of the closure plan as contemplated in section 43(3) of the Act.

REGIONAL MANAGER / DESIGNATED AGENCY

REGION NORTH WEST

1 Number of permission, permit or right

DMRE REFERENCE NUMBER: NW 30/5/1/1/2/1033 (10707) PR

2 Name of applicant

Afplats (Pty) Ltd

3 Type of permission, permit or right in terms of the Act

- Reconnaissance permission [] Reconnaissance permit []
Prospecting right [X] Exploration right []
Mining right [] Production right []
Mining permit []

4 Type of mineral or minerals

All minerals with emphasis on Platinum Group Metals and associated minerals but excluding dimension stone

5 Over the following land or area of offshore licence block

Portion 2 of the farm Wqlvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ

(attached a plan of land, area or offshore licence blocks applied for, if necessary)
Minerals and Energy for Development and Prosperity

6 Reason for application

Lapsing	<input type="checkbox"/>	Cessation	<input type="checkbox"/>
Abandonement	<input checked="" type="checkbox"/>	Relinquishment	<input type="checkbox"/>
Cancellation	<input type="checkbox"/>	Rehabilitation	<input type="checkbox"/>

7 Details of the relevant land, area or operation or offshore licence block pertaining to the application for closure.

Located approximately 18km west of Brits in the North West province
Refer to Table 2.1 in the Closure Plan Report for the 21 digit SG code of the farms Wolvekraal 408 JQ and Kareepoort 407 JQ
Total area covered by the prospecting right: 1 065 ha
Refer to Figures 1-5 of the Closure Plan Report and Basic Assessment Report (for further details including co-ordinates)

8 Application for the transfer of environmental liabilities and responsibilities. If relevant, a separate submission must be appended to the application.

9 The following documents must accompany the application:

- A. A closure plan contemplated in regulation 62.
Refer to Section 7 of the Closure Plan Report
- B. A final performance assessment on the environmental management programme or environmental management plan, as the case may be.
Refer to Section 8.2.4 of the Closure Plan Report
- C. An application form in the form of Form O contained in Annexure II, to transfer environmental liabilities and responsibilities to a competent person, if applicable.
Not Applicable
- D. A copy of an environmental risk report contemplated in regulation 60.
Refer to Section 8.2.5 of the Closure Plan Report and Appendix D of the Basic Assessment Report

Signed at Rustenburg (Place)

on the 12 day of OCTOBER (Month) 2020 (Year)

Philip Fouche

SIGNATURE OF APPLICANT

APPENDIX G: LETTER OF RECOMMENDATION FOR EXEMPTION (PISTORIUS, 2020)

Prepared for:

SLR Consulting (South Africa) (Pty) Ltd

Johannesburg 2060

Tel 0114670945

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**LETTER FOR EXEMPTION FOR A PHASE I HERITAGE IMPACT
ASSESSMENT STUDY FOR THE BASIC ASSESSMENT,
ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE
PLAN FOR THE CLOSURE OF THE WOLVEKRAAL KAREEPOORT
PROSPECTING RIGHT ON THE FARMS WOLVEKRAAL 408 JQ AND
KAREEPOORT 407 JQ NEAR MAKOLOKWE IN THE NORTH WEST**

Prepared by:

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1 DETAILS OF THE SPECIALIST

Profession: Archaeologist, Museologist (Museum Scientists), Lecturer, Heritage Guide Trainer and Heritage Consultant

Qualifications:

BA (Archaeology, Anthropology and Psychology) (UP, 1976)

BA (Hons) Archaeology (distinction) (UP, 1979)

MA Archaeology (distinction) (UP, 1985)

D Phil Archaeology (UP, 1989)

Post Graduate Diploma in Museology (Museum Sciences) (UP, 1981)

Work experience:

Museum curator and archaeologist for the Rustenburg and Phalaborwa Town Councils (1980-1984)

Head of the Department of Archaeology, National Cultural History Museum in Pretoria (1988-1989)

Lecturer and Senior lecturer Department of Anthropology and Archaeology, University of Pretoria (1990-2003)

Independent Archaeologist and Heritage Consultant (2003-)

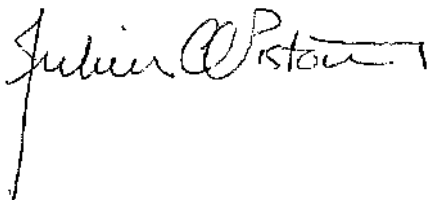
Accreditation: Member of the Association for Southern African Professional Archaeologists. (ASAPA)

Summary: Julius Pistorius is a qualified archaeologist and heritage specialist with extensive experience as a university lecturer, museum scientist, researcher and heritage consultant. His research focussed on the Late Iron Age Tswana and Lowveld-Sotho (particularly the Bamalatji of Phalaborwa). He has published a book on early Tswana settlement in the North-West Province and has completed an unpublished manuscript on the rise of Bamalatji metal workings spheres in Phalaborwa during the last 1 200 years. He has excavated more than twenty LIA settlements in North-West and twelve IA settlements in the Lowveld and has mapped hundreds of stone walled sites in the North-West. He has written a guide for Eskom's field personnel on heritage management. He has published twenty scientific papers in academic journals and several popular articles on archaeology and heritage matters. He collaborated with environmental companies in compiling State of the Environmental Reports for Ekurhuleni, Hartebeestpoort and heritage management plans for the Magaliesberg and Waterberg. Since acting as an independent consultant he has done approximately 800 large to small heritage impact assessment reports. He has a longstanding working relationship with Eskom, Rio Tinto (PMC), Rio Tinto (EXP), Impala Platinum, Angloplats (Rustenburg), Lonmin, Sasol, PMC, Foskor, Kudu and Kelgran Granite, Bafokeng Royal Resources, Pilanesberg Platinum Mine (PPM) etc. as well as with several environmental companies.

2 DECLARATION OF INDEPENDENCE

I, Dr Julius CC Pistorius declare the following:

- I act as an independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even, if this result in views and findings that are not favourable for the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialists report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the applications;
- I will comply with the Act, Regulations and other applicable legislation;
- I will consider, to the extent possible, the matters listed in Regulation 13;
- I understand to disclose to the applicant and the competent authority all material information in my possession
- All the particulars furnished by me in this form are true and correct that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority; and
- I realise that a false declaration is offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



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3 BACKGROUND

Afplats (Pty) Ltd (Afplats) holds a prospecting right on Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ from the Department of Mineral Resources (now referred to as the Department of Mineral Resource and Energy). This prospecting right is referred to as the Wolvekraal Kareepoort prospecting right. The prospecting right area is approximately 16 km west of Brits within the Rustenburg Local Municipality and Bojanala Platinum District Municipality in the North West Province (Figure 1).

Between 2007 and 2014, Afplats undertook prospecting activities on the the above-mentioned portions of farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes were drilled.

Afplats is now planning to close its Wolvekraal Kareepoort prospecting right.

SLR Consulting (South Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Afplats to manage the environmental authorisation processes associated with the closure of the Wolvekraal Kareepoort prospecting right.

4 STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced *prior* to the submission of the Basic Assessment Report (BAR) 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 now the BAR 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 the BAR. Further comments arising during the review of the BAR will be handled in a similar manner.

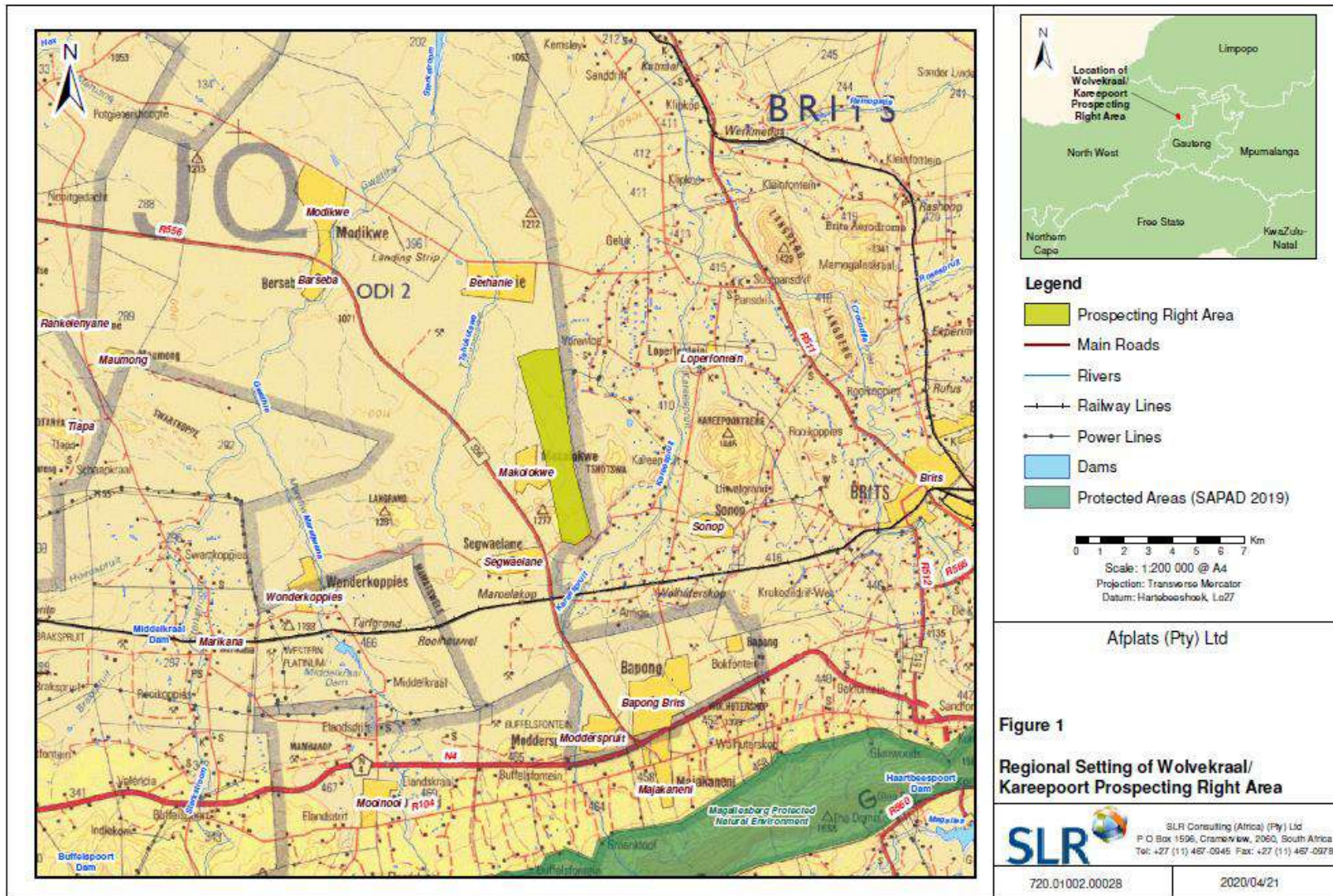


Figure 1: Regional location of the Wolvekraal Kareeboom prospecting right area (above).

5 AIMS OF THE REPORT

This brief report serves as motivation that earlier heritage surveys for the Wolvekraal Kareepoort prospecting right area were undertaken and that all heritage sites encountered on Wolvekraal 408 JQ and Kareepoort 407 JQ were recorded and reported (Part 9 'Bibliography relating to earlier heritage studies').

This brief report, therefore, serves as letter of exemption for a Phase I heritage survey for the BAR, Environmental Management Programme and Closure Plan compiled by SLR for the closure of prospecting activities on the above-mentioned portions of these farms.

6 ASSUMPTIONS AND LIMITATIONS

It is possible that earlier heritage surveys done for the Wolvekraal Kareepoort prospecting right area on portions of the farms Wolvekraal 408 JQ and Kareepoort 407 JQ may have missed heritage resources. Heritage sites may be covered with grass or vegetation whilst others may be located below the surface of the earth and may only be exposed once prospecting activities commence. It is also possible that heritage resources may simply have been missed as a result of human failure to detect them.

7 THE WOLVEKRAAL KAREEPOORT PROSPECTING RIGHT AREA

7.1 Brief project overview description

A description of the Wolvekraal Kareepoort prospecting right area is provided in Table 1 below.

Description	Details
Farm Name	Portion 2 of the farm Wolvekraal 408 JQ and Portion 1 of the farm Kareepoort 407 JQ
Closure application area (ha)	The Wolvekraal Kareepoort Prospecting right area covers an area of approximately 1 065 ha
Types of minerals	Platinum group metals and associated minerals (but excluding dimension stones)
Magisterial district	The prospecting right area is located within the Rustenburg Local Municipality and the Bojanala Platinum District Municipality.
Distance and direction from nearest town	The prospecting right area is approximately 16 km west of Brits (refer to Figure 1).
21-digit Surveyor General Code for each farm portion	BOJQ00000000040800002 BOJQ00000000040700001
Co-ordinates	A: 27°36'54.356"E 25°35'5.896"S B: 27°37'19.659"E 25°34'57.302"S C: 27°37'55.906"E 25°34'53.61"S D: 27°38'15.71"E 25°37'4.731"S E: 27°38'46.382"E 25°39'3.071"S F: 27°38'23.055"E 25°39'18.734"S G: 27°38'3.129"E 25°39'13.87"S H: 27°37'35.191"E 25°37'14.101"S

Table 1: Description of the Wolvekraal Kareepoort prospecting right area (above).

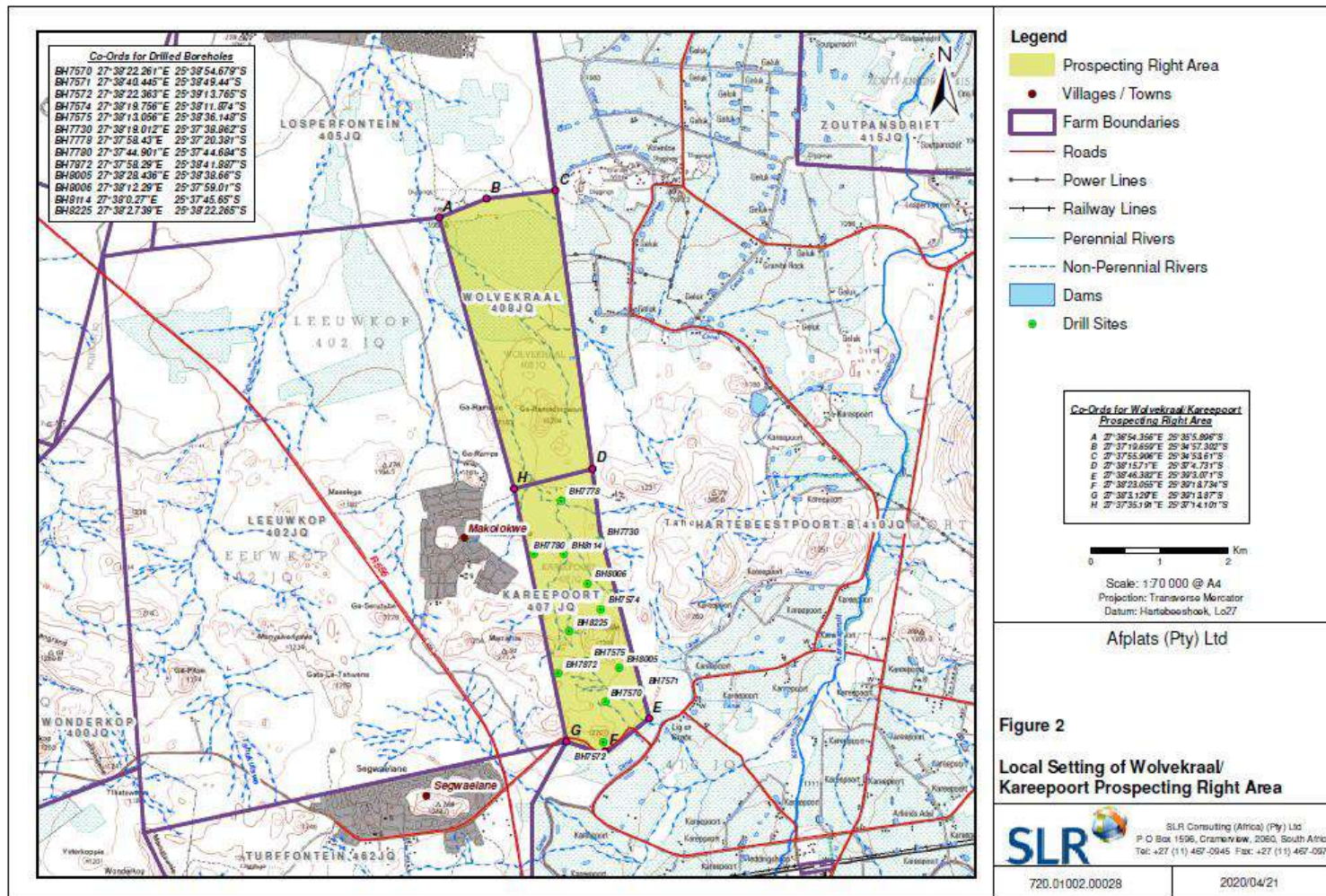


Figure 2: Prospecting drill sites in the Wolvekraal Kareepoort prospecting right (above).

Between 2007 and 2014, Afplats undertook prospecting activities on the above-mentioned portions of the farms Wolvekraal 408 JQ and Kareepoort 407 JQ, during which time 13 approved exploration drill holes was drilled (Figure 2).

Prospecting activities included the establishment of temporary portable ablution facilities, camps, and temporary access tracks when deviations from existing access roads were required. For each drill site, once drilling was complete, the site was decommissioned in line with the approved Environmental Management Programme. Decommissioning included the capping and sealing of the drill holes, removal of any drilling equipment, chemicals and waste as well as removal and filling of sumps and ripping of compacted soils (at drill sites and access tracks) to allow for re-vegetation of the site.

In 2013, the Afplats Board made the decision to apply for the inclusion of this prospecting right area into the adjacent Leeuwkop Mining Right 40/2008 (DMRE ref NW 30/5/1/1/2/256 MR), also held by Afplats. The application in terms of Section 102 of the Minerals and Petroleum Resources Development Act (MPRDA), as amended for such inclusion was submitted to the DMRE in June 2013. A decision is still pending from the DMRE. In February 2020, the prospecting right expired, without the option to renew. In terms of Section 43(3) of the MPRDA, a closure application is required once a prospecting right has expired. The areas disturbed by the prospecting activities have been allowed to re-vegetate and will be used by landowners and land users as they were doing prior to the prospecting activities.

7.2 Brief heritage overview description

Earlier heritage surveys have identified several heritage resources such as Late Iron Age stone walled sites, two graveyards and a cave within the prospecting right area (Figure 3). All these heritage resources are of high significance and are protected in terms of the National Heritage Resources Act (NHA) (No 25 of 1999) (Part 9 'Bibliography relating to earlier heritage studies').

All these sites and graveyards were not affected by the prospecting activities, namely (Figure 4):

- GY01 is a large formal cemetery which is demarcated with a fence and with a gate for controlled access. Drill site BH7778 is located approximately 77 meters to the south-east of the graveyard thus could not be affected by the prospecting activities
- Grave 39 is located approximately 230 meters from drill site BH7570 and approximately 430 meters from drill site BH9005 and thus could not be affected by the prospecting activities.
- Site 20 and 21 (Late Iron Age stone walled sites) are located approximately 200 meters, on opposite sides of drill site BH8225 and thus were not affected by the prospecting activities.
- The cave is located up the slope of a mountain, approximately 190 meters from drill site BH7572 which was drilled on level ground at the foot of the mountain. The cave therefore could not be affected by the prospecting activities.

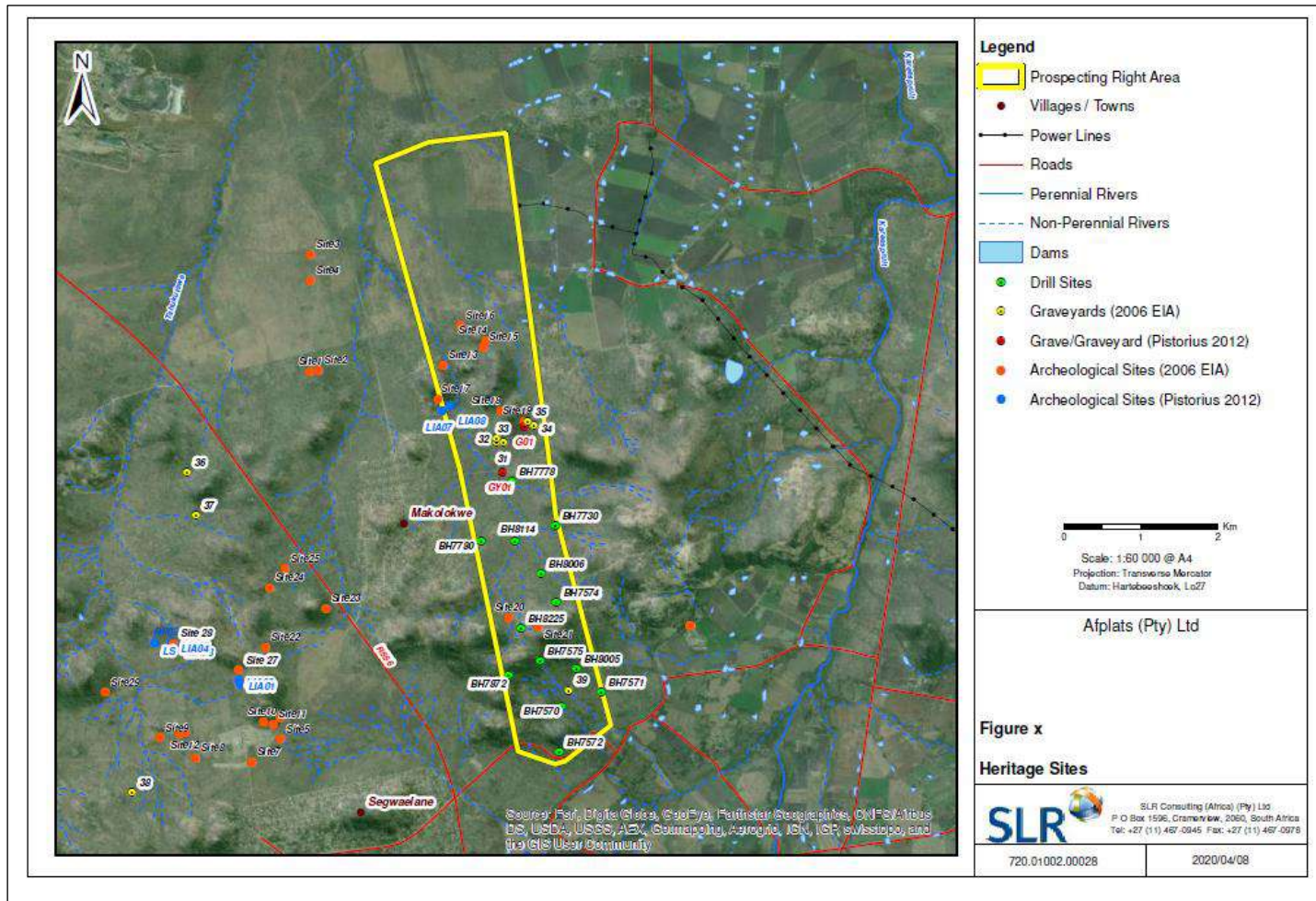


Figure 3: Prospecting drill site and heritage sites in the Wolvekraal Kareepoort prospecting right area (above).

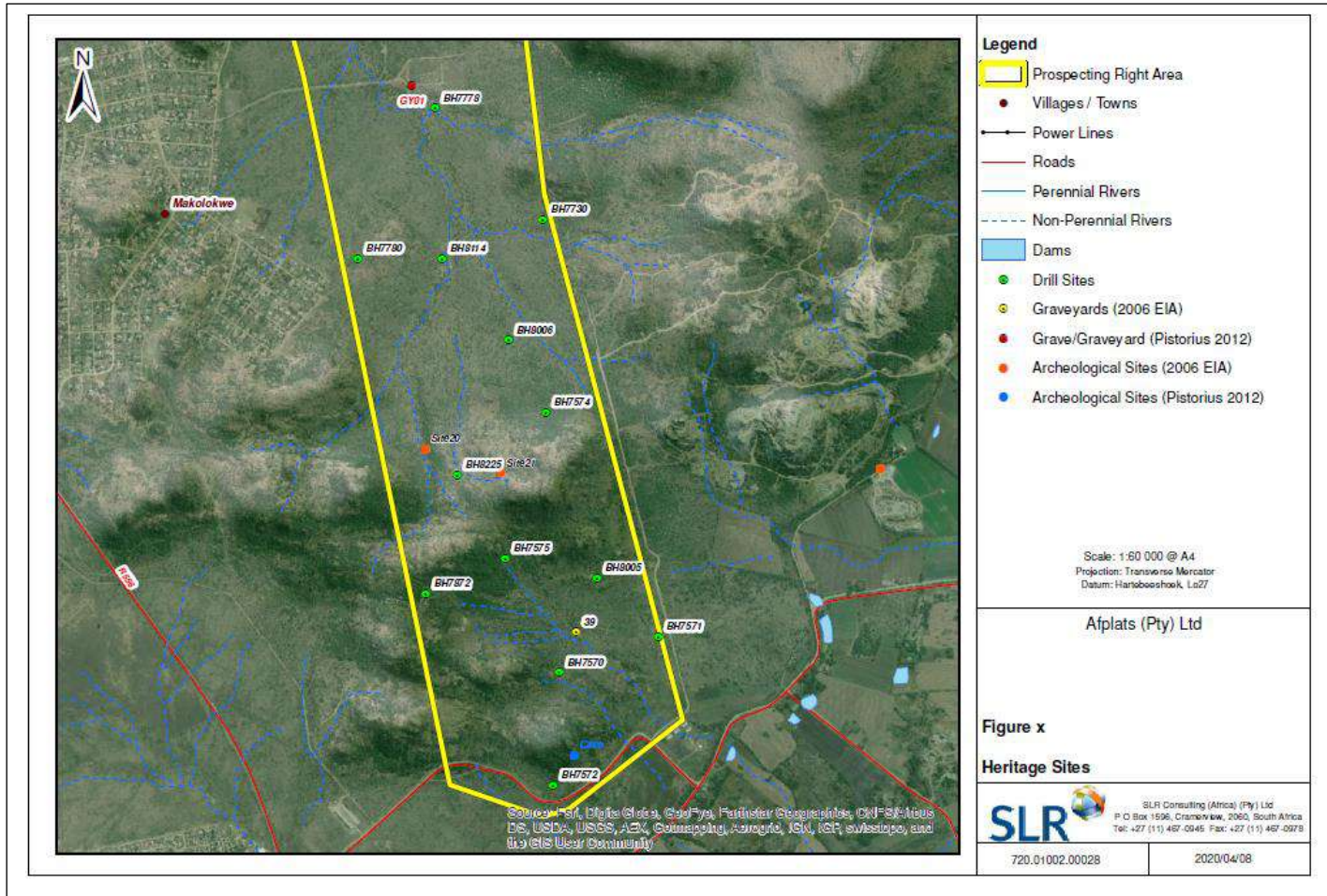
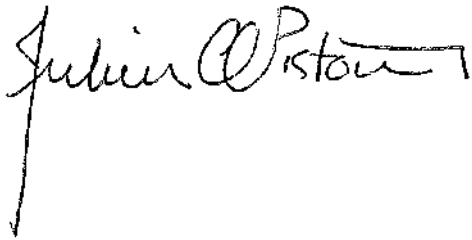


Figure 4: Prospecting drill sites and heritage sites in the Wolvekraal Kareepoort prospecting right area (zoomed in) (above).

8 CONCLUSION

It is evident from Figure 3 & Figure 4 that none of the prospecting drill sites coincided with recorded heritage resources in the Wolvekraal Kareepoort prospecting right area. It is therefore understood that the Wolvekraal Kareepoort prospecting activities did not impact on any of the heritage resources recorded in this area.

The closure of the prospecting right does not require any physical disturbance activities to take place on site. Consequently, no further disturbance will occur at the prospecting right areas for the closure of the prospecting right to take effect.

A handwritten signature in black ink, appearing to read 'Julius CC Pistorius'. The signature is written in a cursive style with a long vertical line extending downwards from the start.

DR JULIUS CC PISTORIUS
Archaeologist & Heritage Consultant
Member ASAPA

9 BIBLIOGRAPHY RELATING TO EARLIER HERITAGE STUDIES

Pistorius, J.C.C. 2004. A Heritage Impact Assessment (HIA) study for Impala Platinum's proposed new No 16 Shaft Complex on the farm Reinkoyalskraal 278JQ in the Bojkone-Bothlaba District Municipality of the North-West Province. Unpublished report prepared for Ground Water Consulting Services CC.

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RECORD OF REPORT DISTRIBUTION

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Proponent:	Afplats (Pty) Ltd

Name	Entity	No.	Date issued	Issuer
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Mohlalisi Motshabi	Department of Rural Environment and Agricultural Development	Electronic	October 2020	R. Mogotshi
Office of the Regional Land Claims Commissioner	Department of Rural Development and Land Reform	Electronic	October 2020	R. Mogotshi
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