



BASIC ASSESSMENT REPORT FOR THE PROPOSED PROSPECTING ACTIVITIES ON VARIOUS PROPERTIES IN THE MAGESTERIAL DISTRICT OF KURUMAN, NORTHERN CAPE

For

Salene Manganese (Pty) Ltd

For the following Minerals:

Aluminium, Silver, Arsenic, Barium, Bismuth, Cerium (Rare Earths), Cadmium, Cobalt, Copper, Caesium, Potassium, Lanthanum (Rare Earths), Lithium, Magnesium, Molybdenum, Neodymium (Rare Earths), Nickel, Phosphorus, Lead, Palladium, Platinum, Rubidium, Sulphur, Scandium (Rare Earths), Silicon, Strontium, Tantalum, Titanium, Vanadium, Tungsten, Yttrium, Zinc and Rare Earths

Located on:

Olive Pan 282, Gama 283, Telele 12, Dikgathlong 268, Dibiaghomo 226, Boshof 300, Roldraai 333, Drakenstein 263, East 270, Umtu 281, Olivewood 284, Mooidraai 310, Kongoni 311, Smartt 314, Middleplaats 332, Klipling 271, Hotazel 280, Epsom 285, Tigerpan 286, Botha 313, Mukulu 265, Gloria 266, Wessels 227, Adams 328, Belgravia 264, Mamatwan 331, Sinterfontein 748, York 279, Devon 277 And Perth 276: Within The Administrative District Of Kuruman, Northern Cape Province

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Title:
BASIC ASSESSMENT REPORT FOR THE PROPOSED PROSPECTING ACTIVITIES ON VARIOUS PROPERTIES IN THE MAGISTERIAL DISTRICT OF KURUMAN, NORTHERN CAPE FOR SALENE MANGANESE (PTY) LTD

Client:

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Salene/Gloria/Prospecting/BAR/v1

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This report has been reviewed and approved for submission by for Salene Manganese (Pty) Ltd:

Date: 25/11/2022

Signature:

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mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

BASIC ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

Basic Assessment Report for the proposed prospecting activities for Salene Manganese (Pty) Ltd for the following Minerals: Aluminium, Silver, Arsenic, Barium, Bismuth, Cerium (Rare Earths), Cadmium, Cobalt, Copper, Caesium, Potassium, Lanthanum (Rare Earths), Lithium, Magnesium, Molybdenum, Neodymium (Rare Earths), Nickel, Phosphorus, Lead, Palladium, Platinum, Rubidium, Sulphur, Scandium (Rare Earths), Silicon, Strontium, Tantalum, Titanium, Vanadium, Tungsten, Yttrium, Zinc and Rare Earths.

The proposed activities will be located on farms Olive Pan 282, Gama 283, Telele 12, Dikgathlong 268, Dibiaghomo 226, Boshof 300, Roldraai 333, Drakenstein 263, East 270, Umtu 281, Olivewood 284, Moidraai 310, Kongoni 311, Smartt 314, Middleplaats 332, Klipling 271, Hotazel 280, Epsom 285, Tigerpan 286, Botha 313, Mukulu 265, Gloria 266, Wessels 227, Adams 328, Belgravia 264, Mamatwan 331, Sinterfontein 748, York 279, Devon 277 And Perth 276: Within The Administrative District Of Kuruman, Northern Cape Province.

SUBMITTED FOR ENVIRONMENTAL AUTHORIZATIONS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND THE NATIONAL ENVIRONMENTAL MANAGEMENT WASTE ACT, 2008 IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (MPRDA) (AS AMENDED).

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IMPORTANT NOTICE

In terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002 as amended), the Minister must grant a prospecting or mining right if among others the mining “will not result in unacceptable pollution, ecological degradation or damage to the environment”.

Unless an Environmental Authorisation can be granted following the evaluation of an Environmental Impact Assessment and an Environmental Management Programme report in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), it cannot be concluded that the said activities will not result in unacceptable pollution, ecological degradation or damage to the environment.

In terms of section 16(3)(b) of the EIA Regulations, 2014, any report submitted as part of an application must be prepared in a format that may be determined by the Competent Authority and in terms of section 17 (1) (c) the competent Authority must check whether the application has taken into account any minimum requirements applicable or instructions or guidance provided by the competent authority to the submission of applications.

It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or a permit are submitted in the exact format of, and provide all the information required in terms of, this template. Furthermore, please be advised that failure to submit the information required in the format provided in this template will be regarded as a failure to meet the requirements of the Regulation and will lead to the Environmental Authorisation being refused.

It is furthermore an instruction that the Environmental Assessment Practitioner must process and interpret his/her research and analysis and use the findings thereof to compile the information required herein. (Unprocessed supporting information may be attached as appendices). The EAP must ensure that the information required is placed correctly in the relevant sections of the Report, in the order, and under the provided headings as set out below, and ensure that the report is not cluttered with un-interpreted information and that it unambiguously represents the interpretation of the applicant.

OBJECTIVE OF THE BASIC ASSESSMENT PROCESS

The objective of the basic assessment process is to, through a consultative process—

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



EXECUTIVE SUMMARY

Salene Manganese (Pty) Ltd is proposing to conduct prospecting activities for the following minerals: Aluminium, Silver, Arsenic, Barium, Bismuth, Cerium (Rare Earths), Cadmium, Cobalt, Copper, Caesium, Potassium, Lanthanum (Rare Earths), Lithium, Magnesium, Molybdenum, Neodymium (Rare Earths), Nickel, Phosphorus, Lead, Palladium, Platinum, Rubidium, Sulphur, Scandium (Rare Earths), Silicon, Strontium, Tantalum, Titanium, Vanadium, Tungsten, Yttrium, Zinc and Rare Earths. The proposed activities will be located on farms Olive Pan 282, Gama 283, Telele 12, Dikgathlong 268, Dibiaghomo 226, Boshof 300, Roldraai 333, Drakenstein 263, East 270, Umtu 281, Olivewood 284, Moidraai 310, Kongoni 311, Smartt 314, Middleplaats 332, Klipling 271, Hotazel 280, Epsom 285, Tigerpan 286, Botha 313, Mukulu 265, Gloria 266, Wessels 227, Adams 328, Belgravia 264, Mamatwan 331, Sinterfontein 748, York 279, Devon 277 And Perth 276: Within The Administrative District Of Kuruman, Northern Cape Province. The following is important to note:

- The minerals Cerium (Rare Earths), Lanthanum (Rare Earths), Neodymium (Rare Earths), Tungsten, Silicon and Rubidium (Rare Earths) are excluded on the following farms: Olive pan 282, Gama 283, Smartt 314 and Telele 12 as there are already accepted applications for the same minerals and land applied for.
- The minerals Lead, Cobalt, Zinc, Copper and Nickel Ore are excluded on the Farm Belgravia 264 as there is already an accepted application for the same minerals and land applied for.

Proposed Activities:

The proposed prospecting activities employs a phased approach, where the work program is divided into several sequential sections. At the end of each section there will be a brief period of compiling, interpretation of results and reporting. These results will not only determine whether the project proceeds, but also the manner in which it will go forward and the locality of the next phase of exploration. The applicant will only action the next stage once satisfied with the results obtained.

No bulk sampling work is to be carried out during the prospecting program as described in this report.

For this report (Phase one) the company only intent to collect samples from existing dumps/ tailings. No invasive drilling is expected or is planned at this stage. Should drilling be necessary, an amended Prospecting Works Plan (PWP) and Environmental Authorisation application shall be submitted for approval.

It is envisaged that the exploration programme (for approval as per this report) will include the following activities/techniques as discussed below.

The data acquisition and reporting will be in accordance with the guidelines of the SAMREC and JORC Codes.

- **Desk-top Studies:** The area is known for Manganese and iron mining. Available historic prospecting data will be captured and evaluated, and a working plan of the area on a suitable scale (1:10 000 or 1:20 000) compiled. The desk top study will provide guidance with respect of areas to target for soil sampling, and drilling (not envisaged at this point in time, if needed an amendment will be applied for).
- **Mapping:** Geologic mapping involves plotting the location and attitude of the various rock units, structures, economic mineral/metal occurrences, etc. as observed in the field on a base map. Geological mapping will be on a scale suitable for the local geological variability. Mapping will be done along lines spaced at regular intervals and oriented perpendicular to the expected north-south striking lithologies in the area. The mapping will primarily focus on the delineation of the KFM Formation to establish the occurrence of minerals that form part of this application.
- **Compilation of Data, Interpretation and Reporting:** This will follow after completion of the non-invasive phase, and before the planning of the first drilling phase (not envisaged at this point in time, if needed an amendment will be applied for), and will be updated after completion of successive drilling programs.
- **Resource estimation:** The borehole logs (from the drilling phase – to be confirmed **and if needed an amendment will be applied for**) and analytical data/results are captured into an electronic database and validated. A geological model is then developed that forms the basis for the resource estimate. The purpose of the resource estimate is to obtain an indication of the tonnage and grade of the potential precious and base metal deposit.



Drilling will only be considered once sampling proves successful. This BAR only covers non-invasive sampling activities. Should drilling be considered then an amendment to the environmental authorization will be applied for.

Listed Activities:

The proposed activities will trigger the following NEMA Listed Activities:

NAME OF ACTIVITY <i>(E.g., For prospecting – drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route)</i>	AERIAL EXTENT OF THE ACTIVITY Ha or m²	LISTED ACTIVITY <i>(Mark with an X where applicable or affected).</i>	APPLICABLE LISTING NOTICE
Sampling site	10 x 12 Sampling Site 1 Sample site = 1 m ² Total Sampling Site Area = 120 m ²	X	GNR 983 (as amended 07 April 2017) Listed Activity 20
Rehabilitation and Closure	120 m ²	X	GNR 983 (as amended 07 April 2017) Listed Activity 22

Need and desirability of the proposed activities:

The positive impact of the proposed activity is the discovery of economically viable mineral resources within the Joe Morolong Local Municipality.

Public Participation:

It should be noted that this report **was** made available to I&AP's for review and comment and their comments and concerns was **included in this report as submitted to the DMRE**. Furthermore, it should be noted that the final impact scores themselves will include the results of the public responses and comments as received by Prescali.

Potential impacts identified:

Aspect	Activity	Impact	Phase	Positive / Negative
All	Planning of prospecting activities	No impacts are foreseen due to the non-invasive nature of the planning phase	All	N/A
All	Consultation of affected parties	N/A	All	N/A
All	Potential construction of roads and infrastructure	None foreseen as existing access roads will be used to access the proposed sampling areas	Co	N/A
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Temporary disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Negative



Aspect	Activity	Impact	Phase	Positive / Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Loss of CBA1 and ESA and other sections of area classed as other natural Areas	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement of Faunal community due to temporary habitat loss, disturbance (noise, dust, and vibration) and/or direct mortalities	O	Negative
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Continued disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Encroachment by alien invasive plant species	O, CI	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Further impacts due to the spread and/or establishment of alien and/or invasive species.	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Further impacts due to the spread and/or establishment of alien and/or invasive species.	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbances such as dust, vibrations poaching and noise.	O	Negative
Groundwater	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Degradation of aquifers.	O	Negative



Aspect	Activity	Impact	Phase	Positive / Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts of existing groundwater users	O	Negative
Heritage Resources	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on potential burial grounds and graves	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on archaeological resources	O	Negative
Noise	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Noise nuisance	O	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Pollution of soil	O	Negative
Air	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Air Quality	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Deterioration and damage to existing access roads and tracks	O, D	Negative
Socio-economic	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential job creation	O, D	Positive
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Safety and security to existing landowners and lawful occupier	O, D	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Interference with existing land uses	O, D	Negative
Waste	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Generation and disposal of waste	O, D	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Erosion due to improper rehabilitation	D	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential soil pollution from hydrocarbons spills from vehicles used to access the site	O	Negative
Land Use	Site access to the proposed sampling site	Potential impact on the disposal of waste on the sampling area by the operational mining company	O	Negative



Aspect	Activity	Impact	Phase	Positive / Negative
Land Use	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential impact on the disposal of waste on the sampling area by the operational mining company	O	Negative
Service provision: Electricity	Site access to the proposed sampling site	Potential overlap with existing ESKOM/ other solar companies infrastructure or future planned expansion.	O	Negative
Service provision: Electricity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential overlap with existing ESKOM/ other solar companies infrastructure or future planned expansion.	O	Negative
All	Rehabilitation of disturbed sites	Rehabilitation of sampling area to predetermined land use	Re	Positive

No specialist studies were conducted for the proposed prospecting activities, as sampling will as far as possible take place on existing mining areas / impacted areas that have already been disturbed or degraded.



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ACRONYMS

DAFF Department of Forestry, Fisheries and the Environment



PART A
SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

1 CONTACT PERSON AND CORRESPONDENCE ADDRESS

1.1. Details of:

1.1.1 The EAP who prepared the report

Name of the Practitioner: Prescali Environmental Consultants.
The report was compiled by Dr Petro ERASMUS (*EAPASA*)(*Pri.Sci.Nat*).
Tel No.: 012 543 3808
Fax No. :086 621 0294
e-mail address: info@prescali.co.za

1.2. Expertise of the EAP

1.2.1. The qualifications of the EAP

(With evidence attached as Appendix 1)

Dr. P. Erasmus has qualifications in Zoology and Biochemistry and further studied in Zoology and Marine pollution. She is registered as a Pri Sci Nat. (SACNASP), Natural Professional Scientist, for Ecological and Environmental Sciences. She is also a registered Environmental Assessment Practitioner with EAPASA. Her qualifications are provided in Appendix 1.

Reviewers:

- Ms Simrin Reddy has qualifications in Environmental Sciences. Her qualifications are provided in Appendix 1.
- Ms. E. van der Linde has qualifications in Geology, Engineering Geology and Environmental Management and experience in Water and Environmental Management. She is registered as a Pri Sci Nat. (SACNASP), Natural Professional Scientist. Her qualifications are provided in Appendix 1.

1.2.2. Summary of the EAP's past experience.

(Attach the EAP's curriculum vitae as Appendix 2)

Dr. P. Erasmus has 15 years of applicable experience (a short resume with a list of projects is attached in Appendix 2 and has been employed by:

- Department: Water Affairs and Forestry (DWAF);
- M2 Environmental Connections (Pty) Ltd; and
- Prescali Environmental Consultants (Pty) Ltd.

Reviewers:

- Miss S. Reddy has 1 year 2 months applicable experience (a short resume with a list of projects is attached in Appendix 2) and has been employed by:
 - Prescali Environmental Consultants (Pty) Ltd.
- Ms. E. van der Linde has 20 years of applicable experience (a short resume with a list of projects is attached in Appendix 2 and has been employed by:
 - Department: Water Affairs and Forestry (DWAF);
 - Groundwater Consulting Services cc;
 - M2 Environmental Connections cc; and
 - Prescali Environmental Consultants (Pty) Ltd.

2. LOCATION OF THE OVERALL ACTIVITY.

The proposed prospecting activities will take place on the following farms and portions as outlined below. Please refer to Figure 3-1.

Application Area (Ha):	73 621.8804 Ha
Distance and Direction from Nearest Town:	50 km North-West of Kuruman
Magisterial District:	Kuruman



Locality Map:	Attach a locality map at a scale not smaller than 1:250 000. See Locality map append as Appendix 3 and included in report as Figure 3-1 and Figure 4-1.
----------------------	--

Applicable to all farms:			
Administrative District:	Kuruman	Registration Division:	RD

1.	Farm Name:	Sinterfontein	
	Farm Number:	748	
	Portions and SG Codes	Farm Portion	SG Code
0		C04100000000074800000	

2.	Farm Name:	Adams	
	Farm Number:	328	
	Portions and SG Codes	Farm Portion	SG Code
0		C04100000000032800000	
4	C04100000000032800004		

3.	Farm Name:	Middelplaats	
	Farm Number:	332	
	Portions and SG Codes	Farm Portion	SG Code
0		C04100000000033200000	
4	C04100000000033200004		

4.	Farm Name:	Smartt	
	Farm Number:	314	
	Portions and SG Codes	Farm Portion	SG Code
0		C04100000000031400000	
1	C04100000000031400001		

5.	Farm Name:	Rissik (in the acceptance letter this farm is referenced as Boshof 300)	
	Farm Number:	330	
	Portions and SG Codes	Farm Portion	SG Code
1		C04100000000033000001	
3	C04100000000033000003		

6.	Farm Name:	Mamatwan		
	Farm Number:	331		
	Portions and SG Codes	Farm Portion	SG Code	
		0	C04100000000033100000	
		1	C04100000000033100001	
		2	C04100000000033100002	
		3	C04100000000033100003	
		8	C04100000000033100008	
		16	C04100000000033100016	
17		C04100000000033100017		
18	C04100000000033100018			
19	C04100000000033100019			

7.	Farm Name:	Perth	
	Farm Number:	276	
	Portions and SG Codes	Farm Portion	SG Code
RE		C04100000000027600000	

8.	Farm Name:	York	
	Farm Number:	279	



	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000027900000
		1	C0410000000027900001
		2	C0410000000027900002
		8	C0410000000027900008
		11	C0410000000027900011
		13	C0410000000027900013

9.	Farm Name:	Olive Pan	
	Farm Number:	282	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000028200000
1		C0410000000028200001	

10.	Farm Name:	Gama	
	Farm Number:	283	
	SG Codes	Farm Portion	SG Code
		0	C0410000000028300000
1		C0410000000028300001	

11.	Farm Name:	Telele	
	Farm Number:	312	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000031200000
1		C0410000000031200001	

12.	Farm Name:	Dikgathlong	
	Farm Number:	268	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000026800000
		1	C0410000000026800001
2		C0410000000026800002	

13.	Farm Name:	Dibiaghomo	
	Farm Number:	226	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000022600000
		1	C0410000000022600001
		2	C0410000000022600002
3		C0410000000022600003	
4	C0410000000022600004		

14.	Farm Name:	Boshof	
	Farm Number:	300	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000030000000
		1	C0410000000030000001
3		C0410000000030000003	
4	C0410000000030000004		

15.	Farm Name:	Roldraai	
	Farm Number:	333	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000033300000
1		C0410000000033300001	

16.	Farm Name:	Drakenstein	
	Farm Number:	263	



	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000026300000
17.	Farm Name:	East	
	Farm Number:	270	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000027000000
1		C0410000000027000001	
2	C0410000000027000002		
18.	Farm Name:	Umtu	
	Farm Number:	281	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000028100000
19.	Farm Name:	Olivewood	
	Farm Number:	284	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000028400000
20.	Farm Name:	Moidraai	
	Farm Number:	310	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000031000000
21.	Farm Name:	Kongoni	
	Farm Number:	311	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000031100000
1	C0410000000031100001		
22.	Farm Name:	Klipling	
	Farm Number:	271	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000031100000
23.	Farm Name:	Hotazel	
	Farm Number:	280	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000028000000
		1	C0410000000028000001
2		C0410000000028000002	
3	C0410000000028000003		
24.	Farm Name:	Epsom	
	Farm Number:	285	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000028500000
1	C0410000000028500001		
25.	Farm Name:	Botha	
	Farm Number:	313	
	Portions and SG Codes	Farm Portion	SG Code
		0	C0410000000031300000
26.	Farm Name:	Mukulu	
	Farm Number:	265	
	Portions and SG Codes	Farm Portion	SG Code



		0	C041000000002650000
27.	Farm Name:	Gloria	
	Farm Number:	266	
	Portions and SG Codes	Farm Portion	SG Code
		0	C041000000002660000
1	C041000000002660001		
28.	Farm Name:	Wessels	
	Farm Number:	227	
	Portions and SG Codes	Farm Portion	SG Code
		0	C041000000002270000
1		C041000000002270001	
2	C041000000002270002		
29.	Farm Name:	Tigerpan	
	Farm Number:	286	
	Portions and SG Codes	Farm Portion	SG Code
0	C041000000002860000		
30.	Farm Name:	Belgravia	
	Farm Number:	264	
	Portions and SG Codes	Farm Portion	SG Code
		0	C041000000002640000
1		C041000000002640001	
31.	Farm Name:	Devon	
	Farm Number:	277	
	Portions and SG Codes	Farm Portion	SG Code
		0	C041000000002770000
1		C041000000002770001	



3. LOCALITY MAP

(Show nearest town, scale not smaller than 1:250000).

The locality maps is provided in Appendix 3 and in Figure 3-1.

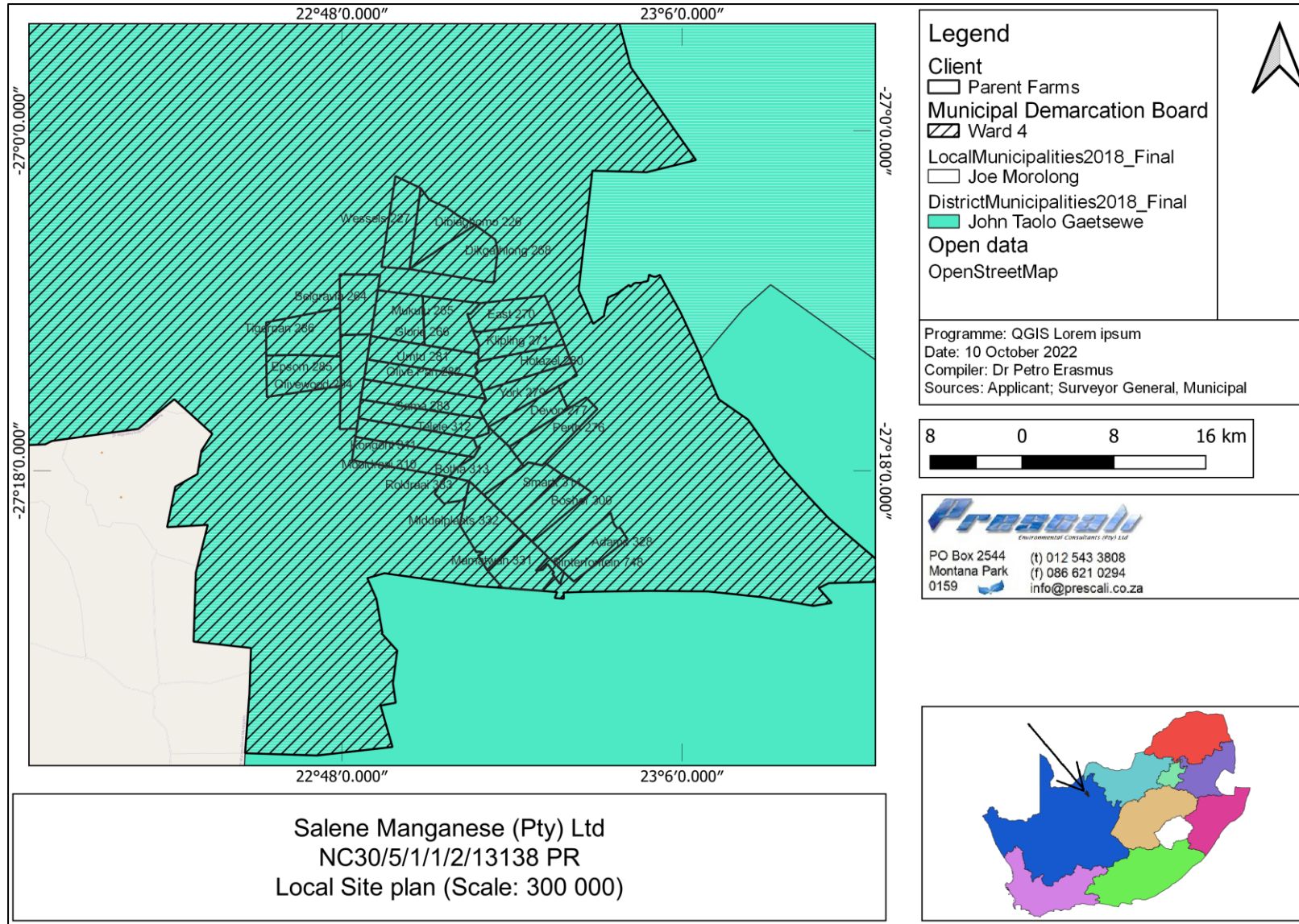


Figure 3-1: Salene Manganese Gloria Prospecting Regional Locality Map (1: 300 000)



4. DESCRIPTION OF THE SCOPE OF THE PROPOSED OVERALL ACTIVITY.

Provide a plan drawn to a scale acceptable to the competent authority but not less than 1: 10 000 that shows the location, and area (hectares) of all the aforesaid main and listed activities, and infrastructure to be placed on site

The plan, showing the location of the proposed prospecting activities with a 500 m radius around each point in which prospecting activities will take place, is provided in Figure 4-1.

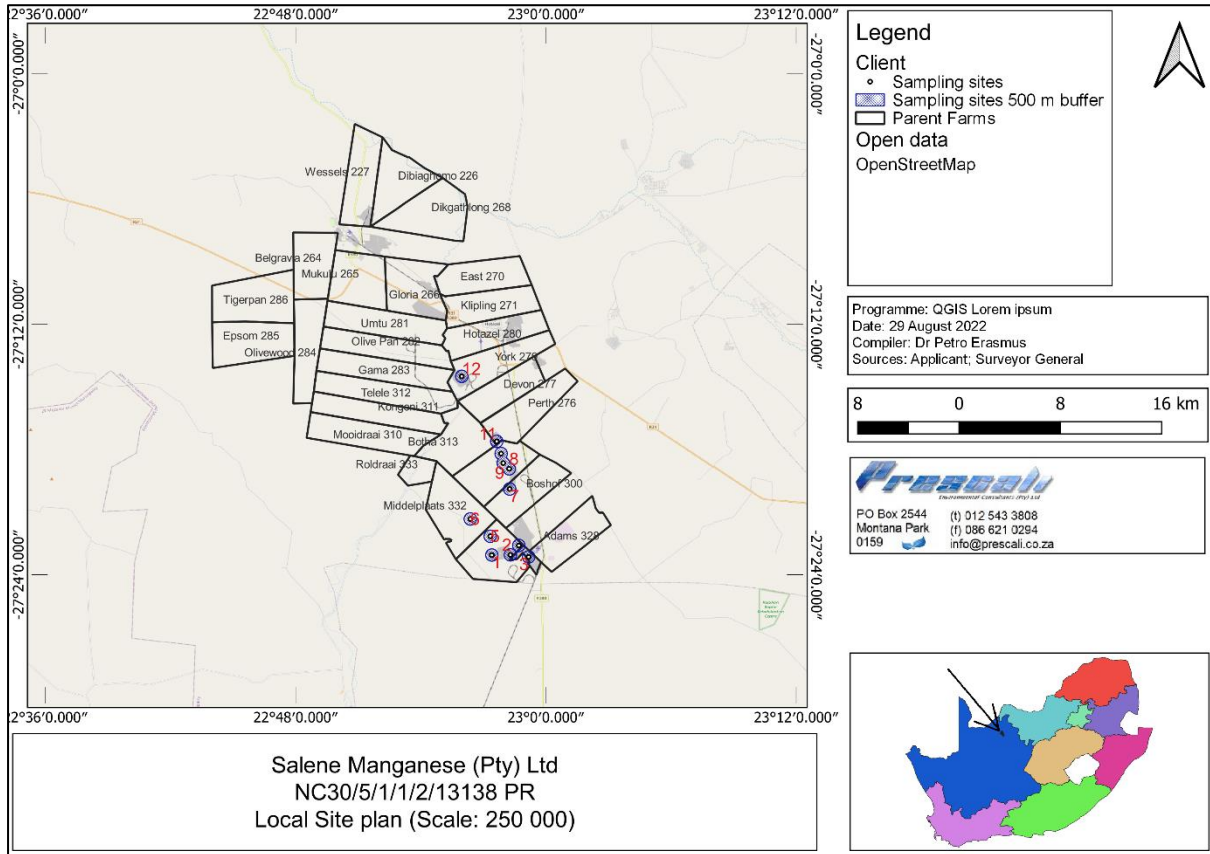


Figure 4-1: Salene Manganese Gloria Prospecting Plan Locality Map

4.1. Non-Invasive Activities:

Desktop Studies: The area is known for Manganese and Iron mining. There are thus a number of existing mines within the target area. Proper consultation will be done with holders of mining rights and prospecting rights to obtain access to the areas before any samples may be taken. Available historic prospecting data will be captured and evaluated, and a working plan of the area on a suitable scale (1:10 000 or 1:20 000) will be compiled. The desktop study will provide guidance with respect of areas to target for soil sampling on existing dumps and disturbed areas.

Mapping: Geologic mapping involves plotting the location and attitude of the various rock units, structures, economic mineral/metal occurrences, etc. as observed in the field on a base map. Geological mapping will be on a scale suitable for the local geological variability. Mapping will be done along lines spaced at regular intervals and oriented perpendicular to the expected north-south striking lithologies in the area. The mapping will primarily focus on the delineation of the KFM Formation to establish the occurrence of minerals that form part of this application.

Compilation of Data, Interpretation and Reporting: This will follow after completion of the non-invasive phase, and before the planning of the first drilling phase (if needed), and will be updated after completion of successive drilling programs (if needed).

Resource estimation: The borehole logs and analytical data/results are captured into an electronic database and validated. A geological model is then developed that forms the basis for the resource



estimate. The purpose of the resource estimate is to obtain an indication of the tonnage and grade of the potential precious and base metal deposit.

4.2. Invasive Activities:

Sampling Program: Samples will be taken from existing dumps, tailings, etc. Approximately 10 samples to be collected within a radius of approximately 500 m from each point. 12 Site points have been identified. Each surface sample will not disturb more than 1 m². Samples will be submitted for analyses to determine the mineral content. Each sample will be logged and split and quartered where assaying is warranted. One quarter will be dispatched to the assay lab, one quarter kept for a permanent record, and the halves utilized for petrological studies or stored for future reference or metallurgical test work. Samples for analysis will be bagged and numbered on site by the geologist and field assistant, and dispatched to the contracted off site accredited laboratory.

Metallurgical Sampling: The mineralized portions of collected samples and boreholes (if needed), as indicated by assay results, would provide sufficient material for metallurgical test work purposes.

Drilling: **Drilling will only be considered after completion of all the sourced historic exploration results and surface samples as described above. If the applicant decides to conduct drilling, then an amendment to the Environmental Authorisation will be submitted to the DMR and the BAR will be amended. The potential impacts of drilling is not assessed in this report.**

- Rehabilitation of the drill sites will be monitored to ensure compliance with the environmental management programme. In all instances drilling would be:
 - Under close supervision of an experienced geologist;
 - Conducted along best practice guidelines
 - Minimize environmental disturbance.
- An independent and experienced drilling contractor will be used to complete the drilling in compliance with the Mine Health and Safety Act, 1996 (Act No. 26 of 1996). Plastic lining will be employed to prevent oil spillage under the drill rigs and hydrocarbon containers. Borehole sites are GPS located and pegged with PVC flags attached to the stakes. The site is inspected and photographed prior to any disturbance. Minimal clearing of drill pads will be done, keeping disturbance to the native vegetation to an absolute minimum. No topsoil will be removed. After completion of a borehole, the collar position will be marked with a numbered concrete block, of approximately 0.5 x 0.5 x 0.5 meters, fitted with a steel rod of approximately 1 m high.
- After each drill hole is complete, logged and sampled the collar will be surveyed by an independent surveyor using a high-accuracy differential GPS. Thereafter the drill area will be rehabilitated according to the procedures as stipulated in the Environmental Management Plan and photographed. The rehabilitation process will be closely monitored to ensure that standards are not compromised. The drill sites are only considered rehabilitated when the project geologist has signed a standard drill pad rehabilitation checklist.
- The boreholes will be logged and mineralized horizons sampled by qualified geologists.

Bulk sampling and testing to be carried out: Bulk sampling will only be considered if a viable target is identified, as part of a feasibility study into the establishment of a mine, in which case an amendment to the Environmental Authorization will be considered. At this stage no bulk sampling is envisaged. In the event that bulk sample is identified, a separate application in terms of the NEMA will be submitted to the competent authority.

Other prospecting methods to be applied: Normal industry practice in terms of assaying, mineralogical testing and metallurgical testing will be followed. If prospecting results indicate the need for any other method of prospecting, then it will be planned and reported to the Department of Minerals and Energy via the relevant reporting structure.

4.3. Description of Pre-/Feasibility Studies

Any program such as this culminates with an overall completion study and in this case the objective would be to provide a pre-feasibility study at a suitably detailed level to enable the submittal of a Mining Right, NEMA and IWUL applications should the mineral resource be suitable for exploitation.



During the final year all data needs to be compiled, interpreted, summarized and evaluated in a final report. Several additional studies will need to be completed in order for an informed decision to be made on whether or not to proceed with development. Aside from all the information already discussed, expert input is frequently required in geohydrology, processing and plant design, engineering and infrastructure, mining and other specialized fields. In addition, extra specialized studies have been allowed for to cover provision of services (power, water, labour), logistics, consumables, and all other items necessary in a pre- feasibility study.

Consequently, while others costs decline in the final year, the cost of consultants is increased as much of the work is traditionally outsourced.



5. LISTED AND SPECIFIED ACTIVITIES

The activities for which an Environmental Authorisation is need is outlined in Table 5-1.

Table 5-1: Listed Activities applied for

NAME OF ACTIVITY (E.g. For prospecting – drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route)	AERIAL EXTENT OF THE ACTIVITY Ha or m ²	LISTED ACTIVITY (Mark with an X where applicable or affected).	APPLICABLE LISTING NOTICE	WASTE MANAGEMENT AUTHORIZATION (Indicate whether an authorization is required in terms of the Waste Management Act). (Mark with an X)
Sampling site	10 x 12 Sampling Site 1 Sample site= 1 m ² Total Sampling Site Area= 120 m ²	X	GNR 983 (as amended 07 April 2017) Listed Activity 20	
Drill Site	Not Identified at this point, Drilling will depend on the sampling sites and a separate Environmental will be applied for if needed	X	GNR 983 (as amended 07 April 2017) Listed Activity 20	
Rehabilitation and Closure	120 m ²	X	GNR 983 (as amended 07 April 2017) Listed Activity 22	

6. POLICY AND LEGISLATIVE CONTEXT

Table 6-1: Applicable Legislation and Guidelines taken into consideration

Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<i>(a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process);</i>		<i>(E.g., In terms of the National Water Act a Water Use License has/ has not been applied for)</i>
The Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996) Section 2 of the Constitution states that: “This Constitution is the supreme law of the Republic; law or conduct inconsistent with it is invalid, and the obligations imposed by it must be fulfilled.”	The BAR and EMPr was accordingly prepared and considered within the	The prospecting application has been submitted in terms of the National



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>Section 24 of the CA, states that everyone has the right to an environment that is not harmful to their health or well-being and to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:</p> <ul style="list-style-type: none"> • prevent pollution and ecological degradation; • promote conservation; and • secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development. <p>Section 24 guarantees the protection of the environment through reasonable legislative (and other measures) and such legislation is continuously in the process of being promulgated. Section 33(1) concerns administrative justice which includes the constitutional right to administrative action that is lawful, reasonable and procedurally fair.</p>	<p>constitutional framework set by Section 24 and 33 of the Constitution.</p>	<p>Environmental Management Act</p>
<p>The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the Environmental Assessment Regulations, 2014 (as amended)</p> <p>The overarching principle of the NEMA is sustainable development. It defines sustainability as meaning the integration of social, economic and environmental factors into planning, implementation and decision making so as to ensure the development serves present and future generations.</p> <p>Section 2 of NEMA provides for National Environmental Management Principles. These principles include:</p> <ul style="list-style-type: none"> • Environmental management must place people and their needs at the forefront of its concern. • Development must be socially, environmentally and economically sustainable. • Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated. • Environmental justice must be pursued. • Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing must be pursued. • Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle. 	<p>The BAR and EMPr was distributed for public review for periods stipulated in NEMA as part of the environmental impact assessment process. The document was also compiled to ensure compliance with the requirements as per the EIA regulations.</p> <p>Refer to Table 5-1 of the BAR for the listed activities applicable to the proposed project.</p>	<p>According to the EIA Regulations (GNR 982, 2014) the following will be submitted in support of the application for Environmental Authorisation: BAR / EMP (this document) together with the results of consultation with Interested and Affected Parties (IAPs) and State Departments.</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<ul style="list-style-type: none"> • The participation of all Interested and Affected Parties (I&APs) in environmental governance must be promoted. • Decisions must take into account the interests, needs and values of all I&APs. The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment. • Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law. • The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people’s common heritage. • The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment. <p>The EIA process to be undertaken in respect of the authorization process of the proposed mining operations is in compliance with the MPRDA, as well as the NEMA read with the Environmental Impact Assessment Regulations of 2014 (as amended). The proposed development involves ‘listed activities’, as identified in terms of the NEMA and in terms of section 24(1), the potential consequences for or impacts on the environment of listed activities must be considered, investigated, assessed and reported on to the Minister of Mineral Resources or to the relevant office of the Department responsible for mineral resources, except in respect of those activities that may commence without having to obtain an environmental authorisation in terms of the NEMA.</p>		
<p>GNR 1147 (20 November 2015) of the NEMA - Financial Provisioning Regulations In accordance with the above legislation, the holder of a mining right must make the prescribed financial provision for the costs associated with the undertaking of the management, rehabilitation and remediation of the negative environmental impacts due to prospecting, exploration and mining activities and the latent or residual environmental impacts that may become known in future.</p>	<p>The Final Rehabilitation, Decommissioning and Mine Closure plan will be compiled in accordance with GNR 1147.</p>	<p>Section 21 of Part A of this report details the calculated financial liability that Salene Manganese (Pty) Ltd must provide for the rehabilitation of the area that is going to be disturbed.</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (MPRDA) Previously South African mineral rights were owned either by the State or the private sector. This dual ownership system represented an entry barrier to potential new investors. The current Government's objective is for all mineral rights to be vested in the State, with due regard to constitutional ownership rights and security of tenure. The MPRDA was passed in order to make provision for equitable access to and sustainable development of the nation's mineral and petroleum resources, and to provide for matters connected therewith. The Preamble to the MPRDA inter alia affirms the State's obligation to:</p> <ul style="list-style-type: none">• protect the environment for the benefit of present and future generations;• ensure ecologically sustainable development of mineral and petroleum resources; and• promote economic and social development. <p>The aforesaid preamble affirms the general right to an environment provided for in section 24 of the Constitution (as set out hereinabove).</p> <p>The objects of the MPRDA, as set out in section 2 thereof serve as a guide to the interpretation of the Act.</p> <p>The objects of the MPRDA are as follows:</p> <ul style="list-style-type: none">• recognise the internationally accepted right of the State to exercise sovereignty over all the mineral and petroleum resources within the Republic;• give effect to the principle of the State's custodianship of the nation's mineral and petroleum resources;• promote equitable access to the nation's mineral and petroleum resources to all the people of South Africa;• substantially and meaningfully expand opportunities for historically disadvantaged persons, including women, to enter the mineral and petroleum industries and to benefit from the exploitation of the nation's mineral and petroleum resources;• promote economic growth and mineral and petroleum resources development in the Republic;• promote employment and advance the social and economic welfare of all South Africans;	<p>An integrated application in terms of the MPRDA and NEMA is being undertaken. The NEMA process for the proposed project is described below.</p>	<p>An application for a Prospecting Right was submitted to the DMR for which an acceptance letter was issued on 01 December 2020.</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<ul style="list-style-type: none"> • provide for security of tenure in respect of prospecting, exploration, mining and production operations; • give effect to section 24 of the Constitution by ensuring that the nation’s mineral and petroleum resources are developed in an orderly and ecologically sustainable manner while promoting justifiable social and economic development; and • ensure that holders of mining and production rights contribute towards the socio-economic development of the areas in which they are operating. <p>The national environmental management principles provided for in section 2 of the NEMA apply to all prospecting and mining operations and any matter relating to such operation. These principles apply throughout the Republic to the actions of all organs of state including inter alia the Department of Mineral Resources that may significantly affect the environment.</p> <p>Any prospecting or mining operation must be conducted in accordance with generally accepted principles of sustainable development by integrating social, economic and environmental factors into the planning and implementation of prospecting and mining projects in order to ensure that exploitation of mineral resources serves present and future generations.</p> <p>Section 38 of the MPRDA states that the holder of inter alia, a prospecting right, mining right or mining permit:</p> <ul style="list-style-type: none"> • Must at all times give effect to the general objectives of integrated environmental management laid down in Chapter 5 of NEMA; • Must consider, investigate, assess and communicate the impact of his or her prospecting or mining on the environment as contemplated in section 24(7) of NEMA; • Must manage all environmental impacts – <ul style="list-style-type: none"> ○ In accordance with an environmental management plan or approved environmental management programme, where appropriate, and ○ As an integral part of the prospecting or mining operations, unless the Minister directs otherwise. • Must as far as reasonably practicable, rehabilitate the environment affected by the prospecting or mining operations to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and 		



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<ul style="list-style-type: none"> Is responsible for any environmental damage, pollution or ecological degradation as a result of prospecting or mining operations and which may occur inside and outside the boundaries of the area to which such right, permit or permission relates. 		
<p>National Water Act, 1998 (Act No. 36 of 1998 (NWA)) In terms of the NWA, the National Government, acting through the Minister of Water Affairs, is the public trustee of South Africa’s water resources, and must ensure that water is protected, used, development, conserved, managed and controlled in a sustainable and equitable manner for the benefit of all persons (section 3(1)).</p> <p>In terms of the NWA a person may only use water without a license under certain circumstances. All other use, provided that such use qualifies as a use listed in section 21 of the Act, require a water use license. A person may only use water without a license if such water use is permissible under Schedule 1 (generally domestic type use) if that water use constitutes a continuation of an existing lawful water use (water uses being undertaken prior to the commencement of the NWA, generally in terms of the Water Act of 1956), or if that water use is permissible in terms of a general authorisation issued under section 39 (general authorisations allow for the use of certain section 21 uses provided that the criteria and thresholds described in the general authorisation is met). Permissible water use furthermore includes water use authorised by a license issued in terms of the NWA.</p> <p>Section 21 of the NWA indicates that “water use” includes:</p> <ul style="list-style-type: none"> taking water from a water resource (section 21(a)); storing water (section 21(b)); impeding or diverting the flow of water in a water course (section 21(c)); engaging in a stream flow reduction activity contemplated in section 36 (section 21(d)); engaging in a controlled activity which has either been declared as such or is identified in section 37(1) (section 21(e)); discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit (section 21(f)); disposing of waste in a manner which may detrimentally impact on a water resource (section 21(g)); 	<p>Refer to Section 10.8 where the baseline water resource of the project area is characterised.</p>	<p>None of the 12 potential sampling areas and the 500 m radius for potential sampling will be in proximity to a watercourse or wetland, thus no listed activities in terms of the NWA are triggered by the proposed project. The appointed contractor will be responsible for providing any water requirements they may need. No abstraction boreholes will be drilled.</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<ul style="list-style-type: none">• disposing in any manner of water which contains waste from, or which has heated in, any industrial or power generation process (section 21 (h));• altering the bed, banks, course or characteristics of a water course (section 21(i));• removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people (section 21(j)); and• using water for recreational purposes (section 21(k)). <p>In addition to the above and in terms of section 26 of the NWA, Regulations on the Use of Water for Mining and Related Activities Aimed at the Protection of Water Resources were published in GN R. 704 of 4 June 1999 (GN R. 704). The aforesaid GN R. 704 provides for inter alia the capacity requirements of clean and dirty water systems (Regulation 6), the protection of water resources by a person in control of a mine (Regulation 7), security and addition measures (Regulation 8) and temporary or permanent cessation of a mine or activity (Regulation 9).</p> <p>According to GN R. 704 “no person in charge of a mine may carry on any underground or opencast mining, prospecting or any other operation or activity under or within the 1:50 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, whichever is the greatest”. Insofar as the undertaking of section 21 water uses is concerned, it is anticipated that application for registration and water use licensing will be undertaken.</p>		
<p>National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA)</p> <p>The NHRA established the South African Heritage Resources Agency (SAHRA) as well as Provincial Heritage Resources Agencies. In terms of the NHRA, no person may destroy, damage, deface, excavate, alter, remove from its original position, subdivide or change the planning status of any heritage site without a permit issued by the heritage resources authority responsible for the protection of such site.</p> <p>No person may damage, disfigure, alter, subdivide or in any other way develop any part of a protected area unless, at least 60 days prior to the initiation of such changes, he/she/it has consulted with the relevant heritage resources authority. Section 34 of the NHRA provides for the protection of immovable property by providing for a prohibition on altering or demolishing any structure or part of any structure, which is older than 60 years, without a permit issued by the relevant provincial heritage resources authority. Accordingly, should the proposed</p>	Refer to Section 10.	None of the listed activities in terms of the NHRA are triggered by the proposed project as the prospecting activities will not transform the character of the already disturbed site.



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>activities, prospecting or mining activities or the closure and rehabilitation of mined land involve the altering or demolishing of any structure or part of any structure, which is older than 60 years, a permit issued by the relevant provincial heritage resources authority is required.</p> <p>No person may, without a permit issued by the responsible heritage resources authority destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite; destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite; trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.</p> <p>No person may, without a permit issued by SAHRA or a provincial heritage resources authority destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves; destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or bring onto or use at the burial ground or grave referred to above any excavation equipment or any equipment which assists in the detection or recovery of metals.</p> <p>Section 38 of the NHRA states that any person who intends to undertake developments categorised in Section 38 of the NHRA must at the very earliest stages of initiating such development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development. By way of example, the developments referred to in Section 38 of the NHRA include:</p> <ul style="list-style-type: none"> • the Site Establishment of a road, wall, power-line, pipeline, canal or other similar form of linear development or barrier exceeding 300 metres in length; • the Site Establishment of a bridge or similar structure exceeding 50 metres in length; • any development or other activity which will change the character of a site as specified in the regulations; 		



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<ul style="list-style-type: none">any other category of development provided for in regulations by SAHRA or the provincial heritage resources authority. <p>However, the abovementioned provisions are subject to the exclusion that section 38 does not apply to a development as described in subsection (1) if an evaluation of the impact of such development on heritage resources is required in terms of the Environment Conservation Act No. 73 of 1989 (EIA) (now presumably the NEMA in view of the repeal of the listed activities under the ECA: Provided that the consenting authority must ensure that the evaluation fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any comments and recommendations of the relevant heritage resources authority with regard to such development have been taken into account prior to the granting of the consent.</p>		
<p>National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA)</p> <p>The NEMBA aims to provide for the management and conservation of South Africa's biodiversity within the framework of the NEMA; the protection of species and ecosystems that warrant national protection; the sustainable use of indigenous biological resources; the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources; the establishment and functions of a South African National Biodiversity Institute; and for matters connected therewith.</p> <p>The NEMBA provides for the publishing of various lists of species and ecosystems by the Minister of Environmental Affairs and Tourism (now the Minister of Water and Environmental Affairs) as well as by a Member of the Executive Council responsible for the conservation of biodiversity of a province in relation to which certain activities may not be undertaken without a permit. In terms of Section 57 of the NEMBA, no person may carry out any restricted activity involving any species which has been identified by the Minister as "critically endangered species", "endangered species", "vulnerable species" or "protected species" without a permit. The NEMBA defines "restricted activity" in relation to such identified species so as to include, but not limited to, "hunting, catching, capturing, killing, gathering, collecting, plucking, picking parts of, cutting, chopping off, uprooting, damaging, destroying, having in possession, exercising physical control over, moving or translocating".</p> <p>The Minister has made regulations in terms of section 97 of the NEMBA with regards to Threatened and Protected Species which came into effect on 1 June 2007. Furthermore, the</p>	<p>The legislation was considered throughout the EIA process and in particular the Ecological Impact Assessment which will comply with the NEMBA.</p>	<p>Species of conservation concern which are typically associated with the prospecting area are Kuruman Thornveld, Kuruman Mountain Bushveld, Kathu Bushveld; and Olifantshoekd Plains Thornveld, however, habitat for these species within the 500 m radius of the 12-sampling area are limited due to the disturbed nature thereof. Permits may be required in terms of NEMBA in the unlikely event that species of conservation concern have habituated within the sampling footprint at any desired sampling location. Potential sampling sites (if necessary) will,</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
Minister published lists of critically endangered, endangered, vulnerable and protected species in terms of section 56(1) of the NEMBA.		however, target already disturbed areas.
<p>National Forests Act, 1998 (Act No. 84 of 1998) The purpose of this Act is to promote the sustainable management of forests. Everyone has the constitutional right to have the environment protected for the benefit of present and future generations; Natural forests and woodlands form an important part of that environment and need to be conserved and developed according to the principles of sustainable management; Plantation forests play an important role in the economy; Plantation forests have an impact on the environment and need to be managed appropriately; The State's role in forestry needs to change; and The economic, social and environmental benefits of forests have been distributed unfairly in the past. GN 1935, Government Gazette No. 46094 of 25 March 2022 for the list of protected tree species.</p>	There are no natural or plantation forests applicable to the application area. Refer to Section 10.7.1 for potential protected tree species that could occur in the area.	There are no natural or plantation forests applicable to the application area. Though unlikely to occur, no protected tree species (dead/alive) will be cut, disturbed, damaged or destroyed without a valid Forest Act Licence.
<p>Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009) The purpose of this act is: To provide for the sustainable utilisation of wild animals, aquatic biota and plants; to provide for the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora; to provide for offences and penalties for contravention of the Act; to provide for the appointment of nature conservators to implement the provisions of the Act; to provide for the issuing of permits and other authorisations; and to provide for matters connected therewith.</p> <p>Potentially important Sections are: 47. Pollution of aquatic systems (1) No person may deposit or cause or allow to be deposited - (a) in an aquatic system; or (b) in any place from where it is likely to percolate into or in any other manner enter an aquatic system, anything, whether solid, liquid or gaseous, which is or is likely to be injurious to fish or fish food or which, if it was so deposited in large quantities or numbers, would be injurious to fish. (2) No person may destroy or cause or allow to be destroyed aquatic habitat in an aquatic system, riparian vegetation or instream spawning habitat. 51. Picking, receipt, possession, acquisition or handling of indigenous plants (1) No person may, without a permit, pick an indigenous plant - (a) on a public road; (b) on land next</p>	Part A, Section 4 and Part B, Sections 4, 5 and 6	No hunting of animals will take place. No animals will be kept / restrained / poisoned. No fishing will take place Activities will not take place within 500 m from a delineated watercourse. No protected plant species will be impacted. No indigenous plants will be picked – activities to be kept to disturbed areas. Should any indigenous plant species be observed during the sampling activities the landowners / lawful occupiers will be informed.



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>to a public road within a distance of 100 meters measured from the centre of the road; or (c) within an area bordering a natural water course, whether wet or dry, up to and within a distance of 100 metres from the middle of a river on either side of the natural water course. (2) No person may, without a permit, pick an indigenous plant in such manner that it constitutes large-scale harvesting or for commercial purposes. (3) No person may collect firewood or pick, transport or remove an indigenous plant on land of which such person is not the owner without the owner's written permission. (4) Subsection (1)(a) and (b) do not apply to the land owner or his or her relative picking an indigenous plant which is not a specially protected or protected plant. (5) No person may - (a) receive an indigenous plant knowing that it was not picked lawfully; (b) possess an indigenous plant in respect of which there is a reasonable suspicion that it was not picked lawfully and be unable to give a satisfactory account of such possession; or (c) acquire or receive into his or her possession or handle an indigenous plant without having reasonable cause for believing, at the time of such acquisition, receipt or handling of such plant, that it was picked lawfully.</p>		
<p>National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEMAQA) The NEMAQA came into power on the 24th of February 2005. Additionally, the amendment to the Minimum Emission Standards (GN R 893) also came into effect on the 12 June 2015. This Notice provides a list of activities that may cause atmospheric emissions which have or may have a significant detrimental effect on the environment as well as the minimum emission standards (“MES”) for these activities as contemplated in section 21 of NEMAQA.</p> <p>The effect of the commencement of the NEMAQA and the listed activities, listed in GN 964 is that an atmospheric emission licence (AEL) is now required for conducting these listed activities.</p>	<p>There are no listed activities that require registration/permitting according to NEMAQA for the proposed prospecting activities.</p>	<p>No listed activities in terms of the NEMAQA are triggered by the proposed project. Therefore, no AEL is required.</p> <p>Activities associated with the proposed project are unlikely to result in exceedances of the air quality standards.</p>
<p>National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA) The NEMWA commenced on 1 July 2009 and as a result of its commencement the relevant provisions in the Environment Conservation Act No. 73 of 1989 (ECA) in respect of waste management, were repealed. The NEMWA sets out to reform the law regulating waste management and deals with waste management and control more comprehensively than was dealt with in the ECA. It also introduces new and distinct concepts never before canvassed within the realm of waste management in South Africa, such as the concept of contaminated land and extended producer responsibility. It also provides for more elaborate definitions to assist in the interpretation of the Act.</p>	<p>There are no listed activities that require registration/permitting according to NEMWA for the proposed prospecting activities</p>	<p>No Listed activities in terms of NEMWA are triggered by the proposed project. Therefore, no Waste Management Licence (WML) is required.</p> <p>Activities associated with the proposed project are unlikely</p>



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>Section 19 of the NEMWA provides for listed waste management activities and states in terms of section 19(1), the Minister may publish a list of waste management activities that have, or are likely to have a detrimental effect on the environment. Such a list was published in GNR 921 of 29 November 2013.</p> <p>In accordance with section 19(3), the Schedule to GNR 921 provides that a waste management licence is required for those activities listed therein prior to the commencement, undertaking or conducting of same. In addition, GNR 921 differentiates between Category A, B, and Category C waste management activities. Category A waste management activities are those which require the conducting of a basic assessment process as stipulated in the EIA Regulations, 2014 promulgated in terms of the NEMA as part of the waste management licence application and Category B waste management activities are those that require the conducting of a scoping and environmental impact assessment process stipulated in the EIA Regulations, 2014 as part of the waste management licence application. Category C waste management activities do not require a waste management licence, however a person who wished to commence, undertake or conduct a waste management activity listed under this category, must comply with the relevant requirements and standards,</p> <p>Section 20 of the NEMWA pertains to the consequences of listing waste management activities and states that no person may commence, undertake or conduct a waste management activity, except in accordance with the requirements or standards for that activity as determined by the Minister or in accordance with a waste management licence issued in respect of that activity, if a licence is required.</p> <p>In terms of the current statutory framework with regards to waste management, a waste management licence is required for those waste management activities identified in the Schedule to GNR 921. Certain of the waste management activities listed in the Schedule are governed by specific thresholds. Where any process or activity falls below or outside the thresholds stipulated, a waste management licence is not required.</p>		<p>to result in exceedances in the thresholds for waste storage.</p> <p>It is however noted that any minimal waste produced on site should be transferred to the nearest licensed waste disposal facility.</p>
<p><i>Integrated Development Plans and Environmental Management Frameworks</i></p>		



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<p>John Taolo Gaetsewe District Municipality IDP 2017-2022¹ From the DM IDP it is noted that the population in the Joe Morolong LM is decreasing and there is a need to ensure that service delivery in this LM is increased to make it comparable to the other LMs in the DM. <i>“Unemployment is a serious problem in the district area. 8.24% of the total population and 26% of the economically active people is unemployed. The situation is especially bad in the area of the Joe Morolong LM. The area’s job opportunities are provided by three primary economic sectors, which are agriculture, mining and retail. The other job opportunities essentially feed of these three sectors. Following the national trend, it is clear from the above-mentioned statistics that job creation must be a key priority consideration for the Municipality in formulating its strategies.”</i> In 2011 the Joe Morolong LM had an unemployment rate of 38.7%. The IDP identified housing development and increase in service delivery and infrastructure as a priority in the Joe Morolong LM.</p>	Part A, Section 10.12.	The aim of the project is to determine if any of the minerals included in the application is viable for exploitation which could open additional employment opportunities in the Local Municipality.
<p>Joe Morolong Local Municipality IDP 2021/2022² Key Performance Area 4 of the IDP speak to Local Economic Development and the Council made a resolution to create as many employment opportunities as possible. The dominant employment / economic sectors are tourism, mining and agriculture but other sectors can be exploited as well, these include construction and manufacturing. Within ward 4 (in which the application area is located) increase in basic service delivery and infrastructure was identified as key performance areas, these include water, housing, recreational facilities, electricity and road services in addition to the promotion of a safe and clean environment.</p>	Part A, Section 10.12.	The aim of the project is to determine if any of the minerals included in the application is viable for exploitation which could open additional employment opportunities in the Local Municipality.
<p>Review Of Spatial Development Framework John Taolo Gaetsewe DM³ From this report, Spatial structuring element 3: Mines and Mining activities it is noted that mining is one of the major drivers of the economy and the spatial structure of the LM. Two linear strips are identified: the Gamagara Mining corridor that is located between Postmasburg and Hotazel and the Asbestos no-go area. <i>“Expansion of the mining industry should be</i></p>	Part A, Section 10.12.	The aim of the project is to determine if any of the minerals included in the application is viable for exploitation which could open additional employment

¹ https://www.cogta.gov.za/cgta_2016/wp-content/uploads/2020/12/JOHN-TAOLLO-FINAL-IDP-17-18-1.pdf 24 August 2022

² <http://www.joemorolong.gov.za/Documents/NC%20451%20ADOPTED%20IDP%202021-22%20FINANCIAL%20YEAR.pdf> 24 August 2022

³ <https://taologgaetsewe.gov.za/wp-content/uploads/2020/07/JTG-SDF-Review-Phase-5-July-2017.pdf> 24 August 2022



Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the legislation and policy context
<i>supported in such a way that negative impacts are minimised and distressed mining communities are supported."</i>		opportunities in the Local Municipality.



7. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES.

(Motivate the need and desirability of the proposed development including the need and desirability of the activity in the context of the preferred location).

Salene Manganese will investigate the occurrence and economic viability of **other minerals** that may occur in areas that have been investigated in detail by many companies in the past for Manganese and Iron only. This will provide information on potential other economically viable mineral resources that could be mined to create employment. As only disturbed areas will be targeted during the prospecting phase as applicable to this report and application, very little or no impacts should occur. Figure 4-1 shows the 500 m radius area around the 12 identified point areas for the proposed prospecting activities.

As far as possible, the areas to be prospected (sampled) on will be already disturbed and at largely active mining areas or existing residue stockpile / deposit areas, no other areas will be disturbed especially any greenfields areas linked to ecologically sensitive area (ESA). The least intrusive method (shovels) will be used to conduct the preliminary assessment. **NOTE: Drilling will only be considered once surface sampling proves successful. This BAR only covers surface sampling activities. Should drilling be considered than an amendment to the environmental authorization will be applied for.**

As an industrial age society, we make use of various metals or materials constructed from metals. The prospecting programme is needed to determine if the minerals below is available for exploitation as new resources are needed to replace areas where mining may have been finalised or to meet an increasing demand. Potential uses of the minerals included in the prospecting application is outlined below.

Table 7-1: Uses of the minerals applied for

Metal	Potential uses
Aluminium (Al)	Aluminium and its alloys are used in aircraft construction, building materials, electrical conductors, chemicals, food processing equipment and in consumer durables such as refrigerators, air conditioners, cooking utensils. ⁴
Arsenic (As)	Overall, consumption of arsenic is small (few hundred tons per year) and it is used in metallurgical application as a result of its metalloid properties e.g., manufacture of lead shot and it improves the thermal and mechanical properties of lead, it also improves the corrosive resistance and thermal properties of copper and brass. Purified arsenic is used with silicon and germanium in semiconductor technologies ⁵
Barium (Ba)	Used for the manufacture of spark plug electrodes, vacuum tubes, florescent lamps and in the oil and gas industries to make drilling mud that lubricates the drill. In addition, it is also used to make paint, bricks, tiles glass, rubber and in fireworks ⁶ .
Bismuth (Bi)	This element is a useful component of type-metal alloys due to its low melting point and expansion on solidification, it is thus used in fire-detection equipment and thermoelectric devices. ⁷
Cadmium (Cd)	AS an anti-corrosion element it is used in electroplating of steel iron, copper, brass and other alloys. Cadmium is also used as anodes with nickel or as the cathode with silver oxide. ⁸
Caesium (Cs)	Caesium is used to scavenge traces of oxygen and other gases in electron tubes and as a catalyst and in photoelectric cells, ion propulsion systems, atomic clocks, and plasma for thermoelectric conversion. ⁹
Cobalt (Co)	Cobalt is a component of various alloys that are used in the manufacture of aircraft engines, gas turbines, high speed steels. It is also used in magnets and magnetic recording devices, a catalyst in the petroleum and chemical industries and as a drying agent in paints and ink. The radioactive isotope Co-60 is used in medical treatment and to irradiate food for preservation and consumer protection ¹⁰ .

⁴ <https://www.britannica.com/science/aluminum> 24 August 2022

⁵ <https://www.britannica.com/science/arsenic> 24 August 2022

⁶ <https://byjus.com/chemistry/barium/> 4 November 2021

⁷ <https://www.britannica.com/science/bismuth#ref280550> 24 August 2022

⁸ <https://www.britannica.com/science/cadmium#ref225131> 24 August 20202

⁹ <https://www.britannica.com/science/cesium> 24 August 2022

¹⁰ <https://byjus.com/chemistry/cobalt/> 4 November 2021



Metal	Potential uses
Copper (Cu)	Used in the creation of various alloys such as bronze. Other uses are: agricultural poison, algicide in water purification and in a number of goods such as coins, cans, cooking foil, saucepans, electricity cables, planes, and space vehicles ¹¹ .
Lead (Pb)	Lead is very ductile, easy to we'd, has a low melting point, high density and absorb gamma radiation and X-radiation and is an excellent solvent. Uses includes the manufacturing of e.g. protective shielding, storage batteries, ammunition and a solder. ¹²
Lithium (Li)	Used in batteries, Lithium also has the potential to be used as a heat transfer fluid for high power density nuclear reactors as a primary coolant. Lithium is also used in the treatment of manic-depression. ¹³
Magnesium (Mg)	Medicinal uses of Magnesium include treatment of skin related problems, Attention Deficit - Hyperactivity disorder (ADHD), anxiety, mania, and recovery after surgery. It is also used in flashbulbs ¹⁴ . Magnesite is used as a refractory metal, catalyst and a filter in the production of synthetic rubber as well as in the preparation of fertilisers ¹⁵ .
Molybdenum (Mo)	Due to its high melting temperature, Molybdenum is used in high temperature steels and in e.g. reaction vessels, aircraft, missiles, automobile parts, electrodes, heating elements and filament supports as well as in pigments and catalysts. ¹⁶
Nickel (Ni)	Nickel has the capacity to resist erosion and thus is used in the production of coins (money), wires, gas turbines, rocket engines, and alloys used for armour plating, nails and pipes. In combination with copper (Monel alloys) it is resistant to sweater corrosion and thus is used in propeller shafts of boats and desalination plants. ¹⁷
Platinum and Palladium, Platinum Group Metals (PGM)	Platinum and palladium are part of the Platinum Group Metals ¹⁸ . That is known for their purity, high melting points, catalytic / oxidation and reduction properties and corrosion resistance, PGMs are utilized in various industrial processes, technologies and commercial applications. Consumer and industrial products include flat panel monitors, glass fibre, medical tools, computer hard drives, nylon and razors. Platinum, palladium and rhodium are also used as autocatalysis and pollution control in the automotive sector.
Potassium (K)	This element is essential for life and is present in all soils and in organisms it assist in electrochemical impulse transmission and in transport across cell membranes. Uses in fertilizer, producing other compounds and making liquid soaps and detergents and in preparing various salts. ¹⁹
Phosphorous (P)	Uses include rodenticide, military smokescreen, semiconductors, fertilisers, safety matches, fireworks, plasticizers, gasoline additives, insecticides (e.g., parathion), and nerve gases. In living organisms it is a component of DNA and RNA, ATP, and bone. ²⁰
Rare Earth Elements (REE)	The REE group consists of yttrium (specifically mentioned in the application acceptance letter) and the 15 lanthanide elements of which three are specifically mentioned in the application acceptance letter (lanthanum, cerium, neodymium), others are: praseodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium) ²¹ . They are used as components in high technology devices such as smart phones, digital cameras, computer hard disks, fluorescent and light-emitting-diode (LED) lights, flat screen televisions, computer monitors, and electronic displays. Some REE's are also used in clean energy and defence technologies. Depending on the element it is also used in lights, screens, and glass, as catalysts, in magnets, batteries and steel alloys. ²²

¹¹ <https://byjus.com/chemistry/copper/> 4 November 2021

¹² <https://www.britannica.com/science/lead-chemical-element#ref278864> 24 August 2022

¹³ <https://www.britannica.com/science/lithium-chemical-element#ref278857> 24 August 2022

¹⁴ <https://byjus.com/chemistry/magnesium/> 4 November 2021

¹⁵ <https://www.britannica.com/science/magnesite> 4 November 2021

¹⁶ <https://www.britannica.com/science/molybdenum> 24 August 2022

¹⁷ <https://byjus.com/chemistry/nickel/> 4 November 2021

¹⁸ <https://www.platinumgroupmetals.net/pgm-markets/default.aspx> 4 November 2021

¹⁹ <https://www.britannica.com/summary/potassium> 24 August 2022

²⁰ <https://www.britannica.com/summary/phosphorus-chemical-element> 24 August 2022

²¹ <https://geology.com/articles/rare-earth-elements/> 4 November 2021

²² <https://www.americangeosciences.org/critical-issues/faq/how-do-we-use-rare-earth-elements> 4 November 2021



Metal	Potential uses
Rubidium (Rb)	This metal spontaneously ignites in air and reacts violently with water and is used in photoelectric cell and as a “getter” in electron tubes to scavenge the traces of sealed-in gasses. ²³
Silver (Ag)	A very good conductor of electricity and heat it is used in the manufacturing of solar panels, photography and electronic devices, thermal or infrared coatings and air conditioners. It is also used as currency in some countries and for jewellery and silverware. Other applications are uses as antibiotic coatings on medical devices and in purifier in water filers ²⁴ .
Silicon (Si)	Silicon occurs naturally in plants and some animals and is used in semiconductors, electronic circuits, switching devices, computer chips transistors, diodes and as a reducing agent in steel, brass and bronze. ²⁵
Strontium (Sr)	Strontium is used in flares, fireworks and trace bullets. Negative impacts of this element is that it can replace calcium in food, concentrate in bones and tooth and cause radiation injury. ²⁶
Sulphur (S)	Sulphur is used in amino acids, insecticides, solvents and in making rubber and rayon. ²⁷
Scandium (Sc)(REE)	Very few uses have been developed ²⁸ but are used in the aerospace industry, sports equipment and mercury vapour lamps that are used in the film and television industry to replicate sunlight ²⁹
Tantalum (Ta)	Tantalum is used as a filament for evaporating metals, high refraction glass (e.g. camera lenses)electrolytic capacitors, vacuum furnace parts, chemical process equipment, nuclear reactors, aircraft and missile parts in addition to surgical appliance as it is immune to body liquids ³⁰
Tungsten (W)	This metal has the highest melting point, greatest high-temperature strength, and lowest thermal expansion coefficient of any metal and is used in steels, lightbulb filaments, electrical contacts, rocket nozzles, chemical apparatus, high-speed rotors, and solar-energy devices. ³¹
Titanium (Ti)	Resistant to corrosion, titanium is used in desalination plants, titanium oxide is used in paints and as it is strong while being lightweight it is used in aircrafts ³² .
Vanadium (V)	As an alloy it is used with steel and iron for high-speed tool steel, high-strength low-alloy steel, and wear-resistant cast iron. Unalloyed, it is used in high-temperature applications, as a target in X-ray applications, and as a catalyst. ³³
Zinc (Zn)	Used in galvanising iron, steel and other metals it is also an essential trace element in red blood cells. Other uses include pigments, ultraviolet light absorber, dietary supplement, seed treatment and photoconductors in addition to pesticides, fluxes and wood preservatives. ³⁴

8. FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ALTERNATIVES WITHIN THE SITE.

NB!! – This section is about the determination of the specific site layout and the location of infrastructure and activities on site, having taken into consideration the issues raised by interested and affected parties, and the consideration of alternatives to the initially proposed site layout.

The identification of alternatives is a key aspect of the success of the evaluation process. All reasonable and feasible alternatives was identified and screened to determine the most suitable alternative to

²³ <https://www.britannica.com/science/rubidium> 24 August 2022

²⁴ <https://byjus.com/chemistry/silver/> 4 November 2021

²⁵ <https://www.britannica.com/summary/silicon> 24 August 2022

²⁶ <https://www.britannica.com/summary/strontium> 24 August 1022

²⁷ <https://www.britannica.com/summary/sulfur> 24 August 2022

²⁸ <https://www.britannica.com/summary/scandium> 24 August 2022

²⁹

<https://www.chemicool.com/elements/scandium.html#:~:text=Scandium%20is%20used%20in%20aluminum,the%20film%20and%20television%20industry.> 24 August 2022

³⁰ <https://www.livescience.com/38994-facts-about-tantalum.html> 24 August 2022

³¹ <https://www.britannica.com/summary/tungsten-chemical-element> 24 August 2022

³² <https://byjus.com/chemistry/titanium/> 4 November 2021

³³ <https://www.britannica.com/summary/vanadium> 24 August 2022

³⁴ <https://www.britannica.com/summary/zinc> 24 August 2022



consider and assess. There are however some significant constraints that have to be considered when identifying alternatives for a project of this scope. Such constraints include financial, environmental and social issues, which will be discussed in the evaluation of the alternatives.

Alternatives can typically be identified according to:

- Location alternatives;
- Process alternatives;
- Technological alternatives; and
- Activity alternatives (including the No-go option).

For any alternative to be considered feasible such an alternative must meet the need and purpose of the development proposal without presenting significantly high associated impacts.

Alternatives can also be distinguished into discrete or incremental alternatives. Discrete alternatives are overall development options, which are typically identified during the pre-feasibility, feasibility and or basic assessment phases of the EIA process. Incremental alternatives typically arise during the EIA process and are usually suggested as a means of addressing identified impacts. These alternatives are closely linked to the identification of mitigation measures and are not specifically identified as distinct alternatives. This section provides information on the development footprint alternatives, the properties considered, as well as the type of activity, activity layout, technological and operational aspects of the activity.

8.1. Details of the alternatives considered

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

8.1.1. Property on which or location where it is proposed to undertake the activity.

The properties on which the proposed prospecting activities will be located are within various properties in the Joe Morolong Local Municipality (LM), see Section 2 and Figure 3-1 as outlined above. Additional properties were applied for but were not included in the approval from the DMR as mineral rights are already allocated: **Heuningdraai 334, Constantia 309, Riviera 335, Simonndium 308, Nchwaning 267, Gould 329 and Santoy 230**. By its nature, the prospecting activities is a study to confirm which minerals are present in a specific area and if it is present in exploitable amounts, therefore no other properties were investigated for this application.

8.1.2. Type of activity to be undertaken

Refer to Section 4 for a full description of proposed activities. Prospecting activities will follow a non-invasive and as a last option, invasive methods. The invasive methods will as far as possible be on areas that are already disturbed and at largely active mining areas or existing residue stockpile areas, no other areas will be disturbed especially any greenfields areas linked to ecologically sensitive area (ESA). In extreme circumstances (phase two and does not form part of this application) using drilling riggs may be required should further exploration be identified. Should additional drilling be needed and amendment to the EMPr and Environmental Authorisation will be applied for.

The option of conducting conventional prospecting activities such as trenching was not considered because of the environmental implication and as the majority of the area targeted has already been disturbed by ongoing / historical mining and bulk sampling activities.

8.1.3. Design or layout of the activity

The location of the 12 sample point areas was determined taking into consideration location of existing mining and disturbed areas and a 500 m radius will allow sufficient space to collect samples to provide a good overview of the potential resource. The proposed layout will reduce the potential environmental impact as it will be located within already disturbed areas.

The alternative is to expand the location of the 12 sample sites to cover the whole of the prospecting area, this may result in environmental impacts on areas that are not currently disturbed by mining activities and is not the preferred option. In addition, by focussing on the already disturbed area, the presence of the minerals under investigation will inform the way forward and if additional exploration will be needed.



8.1.4. Technology to be used in the activity

Samples will be taken from existing residue deposits and stockpiles; no other areas will be disturbed especially any greenfields areas linked to ecologically sensitive area (ESA). Approximately 10 samples to be collected within a radius of approximately 500 m from each of the 12 sample points that have been identified (Figure 4-1). The preferred option is to use manual labour making use of picks and shovels to collect samples. As the proposed 12 locations may be located within active mining areas the required permissions will be sourced and induction as needed will be undertaken to ensure compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996) (MHSA) and any site-specific requirements.

Should drilling be identified as a next phase and amendment to the BAR/EMPr and Environmental Authorisation will be applied for.

8.1.5. Operational aspects of the activity.

Operational aspects are the continuation of the existing mining activities at the proposed 12 sampling points, these should not be impacted by the proposed prospecting activities therefore arrangements with the responsible persons / entities will be made. Any person that will perform the sampling activities as applicable to this application will comply with the MHSA and site-specific requirements.

8.1.6. Option of not implementing the activity.

The proposed prospecting activities will have very little disturbance to the environment as the sampling will take place on/within existing residue deposits / stockpiles.

The no go-option means that the mine dumps, pits and excavations will remain as is and there will be no further prospecting activities that will take place in the area. In addition, no information on the presence of the applicable minerals and if they are present in exploitable amounts will be determined.

9. DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED

Describe the process undertaken to consult interested and affected parties including public meetings and one on one consultation. NB the affected parties must be specifically consulted regardless of whether or not they attended public meetings. (Information to be provided to affected parties must include sufficient detail of the intended operation to enable them to assess what impact the activities will have on them or on the use of their land.

This section of the report provides an overview of the tasks undertaken for the Public Participation Process (PPP) to date. The PPP was conducted in terms of Chapter 6 of the NEMA and included the following:

- a) Identification of key Interested and Affected Parties (affected and adjacent landowners) and other stakeholders (organs of state and other parties);
- b) Placement of site notices on farms, and other accessible public areas;
- c) Formal notification via email, fax and post of the application to key Interested and Affected Parties and other stakeholders;
- d) Consultation and correspondence with I&APs and Stakeholders and the addressing of their comments; and
- e) Newspaper advertisements.

The objectives of PPP include:

- Provides Interested and Affected parties (I&APs) with an opportunity to voice their support, concerns and raise questions regarding the project, application or decision;
- Provides an opportunity for I&APs, Environmental Assessment Practitioners (EAPs) and the Competent Authority (CA) to obtain clear, accurate and understandable information about the environmental, social and economic impacts of the proposed activity or implications of a decision;
- Provides I&APs with the opportunity of suggesting ways of reducing or mitigating negative impacts of an activity and for enhancing positive impacts; and
- Enables the applicant to incorporate the needs, preferences and values of affected parties into the application.



The PPP must comply with several important sets of legislation that require public participation as part of an application for authorisation or approval; namely:

- The Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002 - MPRDA); and
- The National Environmental Management Act, 1998 (Act No. 107 of 1998 - NEMA).

Adherence to the requirements of the above-mentioned Acts will allow for an Integrated PPP to be conducted, and in so doing, satisfy the requirement for public participation referenced in the Acts.

During the process, the following methods are used to develop a stakeholder database which will be utilised to ensure a proper representation of stakeholders interested in or affected by the proposed Project.

This included the following:

- Search works and desktop searches are conducted in and around the project area to verify land ownership and obtain contact details;
- Responses received from newspaper advertisements, public notices and site notices;
- Responses received from distribution of the Information Pamphlet with map and Registration form;
- Identification and consultation with stakeholders including commenting authorities (local and district municipalities);
- Organs of state, other than the competent authority, such as the **Department of Forestry, Fisheries and the Environment (DFFE)** having jurisdiction in respect of any aspect of the proposed project and affected authorities; and
- Consultations with affected landowners.

The PPP commenced on 25 August 2022 when the information pamphlet was posted and emailed to the I&APs for which contact details could be sourced using a Google™ search. A site visit which included the placing of site notices in and around the fences of the various farms was done on 30 and 31 August 2022 by Ms Alicia Opperman. A registration period commenced on 25 August 2022 and I&APs was requested to register before or on 30 September 2022. The notification includes:

- Newspaper advertisement: published in Kathu Gazette on 27 August 2022 Page 2;
- Site Notices: erected at various points on 30 and 31 August 2022;
- Public Notices: distributed to identified stakeholders, landowners and residence (where possible) on 30 and 31 August 2022 and throughout the registration period as requested;
- To allow sufficient time for pre-identified I&APs for which no email, telephone or fax was available, notices was posted using registered mail on 25 August 2022; and
- Faxes and emails were forwarded to pre-identified I&APs on 25 August 2022.

Consultation meetings will be held with registered I&APs via a Virtual platform and an In Person meeting to be held in Hotazhel. **Various Virtual meetings will be held by I&APs as per their preference and an on-site meeting will be held in Hotazhel (date to be confirmed at date of printing).**

All pre-identified and registered I&APs will be notified of the availability of the Basic Assessment Report for public view for a period of 30 days (**20 October 2022 to 20 November 2022**) within which the report can be reviewed and comments forwarded to the environmental consultant. Consultation sheets and a comments and issue register will be included in the BAR as submitted to the DMR.



9.1. Summary of issues raised by I&APs

(Complete the table summarising comments and issues raised, and reaction to those responses)

A summary of the issues raised is provided in the Table below. All communication send and received is provided in Appendix 7.

Table 9-1: Summary of issues raised by I & APs

Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
<i>List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.</i>				<i>Reference in this report where the issues and or response were incorporated.</i>
AFFECTED PARTIES				
Landowner/s and Lawful occupier/s of the land				
Peter Smith- Atlantic Renewable Energy Partners (Pty)Ltd	21/11/2022	It was confirmed that the phase 1 prospecting activities does not overlap with the Solar plant footprint and it was requested that the following properties be removed from the Prospecting Right Application: Remaining extend of York A279 / Portion 11 of York A279 / Remaining extend of Portion 3 of York 279 / Remaining extend (portion 0) of Hotazhel 280.	<p>1.1 Salene acknowledges the proposed ABO Wind Hotazel PV (Pty) Ltd and Hotazel Solar Facility 2 (Pty) Ltd in respect of the following properties that overlap with a prospecting right application by Salene Manganese.</p> <p>1.2 On 13 November 2022, and as part of the public participation process for the prospecting right application, Mr Peter Smith, Project Manager and on behalf of Atlantic Renewable Energy Partners (Pty) Ltd, requested that Salene Manganese remove the overlapping areas listed above, since no prospecting activities are planned by Salene at this stage on the relevant properties.</p> <p>1.3 As mentioned during the public meeting in Hotazel on 15 November 2022, Salene Manganese</p>	Part B



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			<p>will follow a phased approach in respect of the proposed project. Phase 1 will only involve sampling from previously disturbed mining areas such as dumps. Should Phase 2 be implemented, such a phase may include drilling of areas, etc. For Phase 2, Salene Manganese will need to apply for an amendment of its Environmental Authorization as well as the Prospecting Work Programme.</p> <p>1.4 Salene Manganese at this stage propose not to remove any properties from its proposed prospecting area, since it may impact on potential future underground mining rights, not influencing your surface activities.</p> <p>1.5 However, Salene undertakes in favour of ABO Wind Hotazel PV (Pty) Ltd and Hotazel Solar Facility 2 (Pty) Ltd that it will conduct proposed Prospecting Operations in such a manner so as to not interfere with ABO Wind Hotazel PV (Pty) Ltd and Hotazel Solar Facility 2 (Pty) Ltd' development, construction and operation of the Solar PV Plant on the York Overlapping Portion, or any activities incidental thereto.</p> <p>1.6 The PR Holder shall carry out its Prospecting Operations on the York Overlapping Portion –</p> <p>1.6.1 in accordance with the Applicable Laws; and</p>	



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			1.6.2 in accordance with Good Industry Practice. 1.6.3 Any future mining activities by Salene Manganese shall be planned, in consultation with ABO Wind Hotazel PV (Pty) Ltd and Hotazel Solar Facility 2 (Pty) Ltd, so as not to interfere with development, construction and operation of the Solar PV Plant on the York Overlapping Portion, or any activities incidental.	
David Peinkie- Atlantic Renewable Energy Partners (Pty)Ltd	09/09/2022	Developing solar PV projects on the remainder farm York 279	This is noted and referenced for any future phases of prospecting that may be done.	Part B, Table 5-1
Chris Claassens- Tswalu Kalahari Reserve	02/09/2022	What is the purpose of public participation being conducted?	Salene Manganese (Pty) is applying for mining rights on various properties, Boshof 300 being one of them. With some minerals already being accepted for the same minerals and land applied for. This application for approval for collection of 10 sample in a 500m radius of 12 selected points that interest existing mining residue deposits and stockpiles. Should drilling for geological logs be required to increase the applicant's knowledge of the occurrence of the proposed minerals then an amendment to the existing environmental approval will be applied for. from the title deed it indicates that Tswalu Game Lodge (Pty)Ltd is the owner of Boshof 300.	During the assessment it was noted that the Farm Boshoff as owned by Tswalu is located outside the delineated Prospecting area. The farm applicable is Rissik 330, refer to Part A, Section 2.



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
Gert Theart- Olivewood	06/09/2022	Does it involve "invasive" or " non-invasive" prospecting work?	Both will be used; this application is for collecting samples on existing residue deposits.	This report
		When and where do you intend to prospect?	Will depend on the authorisation and agreements with property owners	Part A, Section 2 and 19
		Proposal of when and how you want to use which part of the surface of land	It will be no-invasive and samples will be taken from existing mining residue deposits.	Part A, Section 4
		Rehabilitation guarantee	Currently the rehabilitation guarantee has not been submitted to the DMRE and will be done when requested by the DMRE	Part A, Section 21
		What is the process of rehabilitation after the completion of the prospect?	Due to the sampling locations being on existing mine residue depositions, the main aim will be to ensure that the operational aspects of the area are not harmed /unsafe.	Part B, Section 6
Bouke Wikus Bylsma	28/09/2022	1. Will the required party follow the necessary Health and Safety regulations?	1) Yes, all personnel of Salene Manganese will comply with the Mine Health and Safety Act and its regulations as well as any site specific requirements of any of the existing mines.	Part B
		2. Is the required Company registered for prospecting and do they have a licence?	2) Salene Manganese is a reputable mining company and hold several mineral and prospecting rights. This is a new area where they are applying for a prospecting right.	N/A
		3. How long will this prospecting / drilling project be?	3) Prospecting will take place within the 5 year for which the Environmental authorisation will be valid.	Part A, Section 19
		4. What type of drilling? Elements? 5. How deep will they drill? And what will the perimeters be of the holes?	4 to 8) Currently no drilling is proposed, should the sampling of the existing residue stockpiles / deposits	Part a, Section 4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		<p>6. Will the holes be rehabilitated by the Company? 7. If holes are drilled, will it affect my borewater on the farm? 8. Who must provide water for drilling?</p>	<p>indicate the potential for the mineral being applied for an amended Environmental authorisation for the drilling will be submitted.</p>	
		<p>9. Is electricity necessary and who are responsible for paying the usage?</p>	<p>9) No electricity is required for this application.</p>	<p>N/A</p>
		<p>10. How many people and vehicles will be on the premises?</p>	<p>10) For this application it is anticipated that potentially 2 people in 1 vehicle will be needed.</p>	<p>Part B</p>
		<p>11. Who are responsible for accommodation if the team are to stay at site?</p>	<p>11) No accommodation on site is required for this phase.</p>	<p>N/A</p>
		<p>12. All hazardous spills are to be removed by the company as required by law regulations.</p>	<p>12) So noted and included in Management measures.</p>	<p>Part B</p>
		<p>13. What type of equipment will be used?</p>	<p>13) For this application a pick / shovel was indicated.</p>	<p>Part B</p>
		<p>14. Who are responsible for insurance and security regarding equipment?</p>	<p>14) Salene Manganese will be responsible for their own equipment and insurance.</p>	<p>N/A</p>
		<p>15. A signed contract must be in place and full payment has to be paid before starting project, or entering the premises.</p>	<p>15) So noted and included in Management measures.</p>	<p>Part B</p>
		<p>16. All damages on fence must be fully repaired / replaced or refunded by the Company or Contractor according to the owners' requirements.</p>	<p>16) So noted Salene Manganese will repair damages on fence should their actions cause any such damage.</p>	<p>N/A</p>
		<p>17. No wood collections will be allowed.</p>	<p>17) So noted, no wood collections will be allowed.</p>	<p>Part A, Table 6-1</p>
		<p>18. No open fires will be allowed.</p>	<p>18) So noted no open fires will be allowed.</p>	<p>N/A</p>
		<p>19. No game hunting will be allowed.</p>	<p>19) So noted no game hunting will be allowed.</p>	<p>Part A, Table 6-1</p>



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		20. No unauthorised people will be allowed during the project period.	20) Salene manganese will arrange with property owners and no unauthorised people will be allowed on site.	Part B
Kyra-South (Werksmans Attorneys)- Sebilu Resources (Pty) Ltd	04/10/2022	Appeal lodged in terms of the MPRDA over the application.	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys) -Tawana Hotazel Mining (Pty)Ltd	04/10/2022	Appeal lodged in terms of the MPRDA over the application.	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys) Hotazel Manganese Mines (Pty)Ltd (Wessels)	05/10/2022	Appeal lodged in terms of the MPRDA over the application in relation to the Wessels mine.	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys) -Hotazel Manganese Mines (Pty)Ltd (Mamatwan mines)	05/10/2022	Appeal lodged in terms of the MPRDA over the application in relation to the Mamatwan mine.	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys)- Hotazel Manganese Mines (Pty)Ltd (Middelplaats)	05/10/2022	Appeal lodged in terms of the MPRDA over the application in relation to the Middelplaats mine.	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys)- Assmang Proprietary Limited	10/10/2022	Appeal Lodged in terms of the MPRDA over the application lodged inter alia the farms Belgravia 264 and Gloria 266)	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys)- United Manganese of Kalahari Proprietary Limited	20/10/2022	Appeal Lodged in terms of the MPRDA over the application lodged inter alia on the farms Botha 313, Middelplaats 332, Moodraai 310, Smartt 314 and Roldraai 333	The appeal documentation has been forwarded to the applicant for the response.	N/A
Kyra-South (Werksmans Attorneys)- Mokala Manganese Proprietary Limited	24/10/2022	Appeal Lodged in terms of the MPRDA over the application lodged inter alia the farm Gloria 266	The appeal documentation has been forwarded to the applicant for the response.	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
Awie Pretorius Twana Hotazel Mining (Pty) Ltd	08/11/2022	I am a bit confused here because your application right covers quite an additional number of farms, now if I look at what you guys are planning to do that is only sort of extensive on five farms at this state and not the long list of farms that you started off with so can you explain how that happens that such a wide area is being applied for but you are only focusing on those five sites?	Yes. Though the application is on a greater area, the applicant does not want to waste unnecessary resources or impact on additional environmental areas, which might be greenfields areas. The applicant decided that for the first phase the aim is to see if the potential is there, focusing on sites that already has been impacted. So, this is why it's only focused on the identified areas because this is where they have identified existing residue deposits and stockpiles. But future exploration, based on the finding of this, will be expanded to include the greater area.	This report
		If I am correct, you guys are targeting twelve sites and you are going to take ten samples on each one of those, is that correct?	Correct	Part A, Section 2, 3, 4
		And also, the fact that you say you are going to use a pick and shovel to collect those samples that suggests to me that it is going to be a relatively small sample that you are going to collect. It is not going to be twenty tons of sample per site.	Each of the ten samples at the 12 sites might be about one kg, so grab samples. And it will not take more than eight hours on site.	Part A, Section 2, 3, 4
		Then I want to circle back to the whole conflict and definition of residue deposit. I'll be clear that we are talking about waste, remember what we are doing in that area is that we are mining manganese and the Salene Manganese is going to come on our side. So, we should be clear that they are not going to	Yes, the Prospecting Works Program also specifically excludes manganese. The prospecting right will not be for manganese and for other minerals that manganese offers. So, the company acknowledges that manganese is already an existing right, already taken up and in some	Part A, Section 2, 3, 4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		<p>be collecting manganese samples but waste rock like calcretes and angonite formation and that sort of thing.</p> <p>How were the residue deposits identified? Which process was followed? How did you identify that there are residue deposits on those farms?</p>	<p>cases, there is also iron ore, so the application will not include manganese or iron.</p> <p>A desktop study through Google Earth was used and we identified where there might be residue stockpiles, waste rock and so on. We did not assess any of the properties, it was exclusively desktop.</p>	<p>N/A</p>
<p>Mahlogonolo Kgothadi Twana Hotazel Mining (Pty) Ltd</p>	<p>08/11/2022</p>	<p>Can you define what you mean which stockpile are you referring to?</p>	<p>Looking at the definition of residue stockpiles and residue deposits that is stockpiles that is generated incidental or as a result of mining activities which could be either remain temporary or permanently on site. So that is what is meant with the residue deposits and reside stockpiles.</p>	<p>N/A</p>
<p>Peter Smith Hotazel PV and Hotazel Solar Facility 2 of the Farm York 279</p>	<p>08/11/2022</p>	<p>Can you go back to the previous slide very quickly with regards to the solar PV facilities. On the Farm York 270 where you say that no sampling with impact proposed PV facilities. Have you got those footprints or is that generated from the database of the renewable energy DFFE website?</p> <p>If I look at you draft Basic Assessment Report Figure 5.1, that map that you have got there, that overlaps with our solar PV Hotazel facility and the entire area is covered by our proposed PV facility infrastructure. So, there is definitely going to be an impact from your proposed sampling point and your radius of 500 m of our proposed infrastructure on Farm York 279</p>	<p>Yes, so that is information that we had from DFFE and then also Johan Geeringh from ESKOM forwarded us maps.</p> <p>Yes, but that would be for the future. So even for the 500 m radius, if it goes into a different farm, even the ten sub samples will still only be taken on the existing residue deposits. So, if you look at this map and you see the blue area, that is the 500 m radius. It stays on the existing residue deposit.</p>	<p>Part B</p> <p>Part A, Section 2, 3, 4</p>



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		That still overlaps with our PV area	Is your solar plant located on the residue deposits? It was confirmed using Google Earth and Kml files provided that the current prospecting activities (phase 1) does not overlap the surface solar panels area.	N/A
		We have got infrastructure that is covering that entire Farm portion.	That is something that needs to be taken into consideration. It was suggested that a meeting on site be held after in the in-person meeting on the 15 th November 2022. It was confirmed using Google Earth and Kml files provided that the current prospecting activities (phase 1) does not overlap the surface solar panels area.	N/A
		As the solar company is based in Cape Town, they would not be able to attend the proposed site visit. However, they could provide kml files that show the proposed footprint areas.	a KML file of the solar plant footprint was requested to enable the EAP to determine how the prospecting location will overlap with the solar surface infrastructure.	N/A
		We have also got an approved Section 53 for surface use rights from the DMRE for that whole Farm.	Noted	N/A
Eben Anthonissen Agri Kuruman & Landowner.	15/11/2022	The mining right on the Farm Macarthy, is that mine already in production or is it still in development?	It is already in production / operational. At this stage the mine has been developed but is not operational. They stopped recently as a result of a S102 amendment to the environmental authorization and to obtain a water use license.	N/A
		I would like to know if you applied for a water use license after production has started?	A water use license was applied for in 2014 during the original Mining right application but was not processed. A new water use license application was	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			submitted in 2021 which includes new water uses as well.	
		<p>The application area is so vast and so big but samples are being taken on existing mining rights. It's not invasive prospecting that's taking place. But the other farms or properties that's not being explored is included in the application area for the possibility of invasive prospecting. If you look at the bigger picture, most of those farms are commercial agricultural land. Why apply for properties if there's a possibility and to amend an environmental authorization if there's are possibility to determine feasibility of such a project for invasive drilling? Why include it now because those landowners use the value of the property in order to obtain loans and a prospecting right for possible invasive prospecting will most certainly devalue that property. Why is it necessary to include those farms?</p>	<p>The entire area is targeted for possible exploration in future. This phase is only for sampling processes. If additional sampling is identified based on this phase sampling results a revised environmental authorization and a revised prospecting works program and will be needed and additional consultation with all the interested and affected parties will be done. If Salene hadn't applied for this prospecting right are, it can be guaranteed that someone else would have applied for it.</p>	Part A, Section 2, 3, 4
		<p>Anybody can apply for those minerals but my problem here is why primarily focus on sampling? This is a prospecting area with a possibility of invasive prospecting this whole process should be handled with the necessary environmental authorizations, working through all the necessary environmental liabilities in order to justify the landowners their existence and their business on that property.</p>	<p>There is also a lot of existing operating mines in this area. That is why the application at this stage is only sampling on disturbed areas such as waste rock dumps. Salene for this phase only want to do sampling to see what is there and what is not there. Only once they can prove that there is some occurrence of the targeted minerals, they will explore further but it's not necessary that there is occurrence</p>	Part A, Section 2, 3, 4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		I understand and that's the whole purpose of exploration, but why include further properties to amend an environmental authorization if it is not going to be useful?	It is to make sure if there is something and that Salene have the opportunity and the right to begin the explorations. If Salene had not included the areas, the mining companies in this area would apply for the same. If at all there is going to be additional activities, there will be an application for additional prospecting and all the necessary specialist studies and so forth will be done in terms of the NEMA processes.	N/A
		As soon as the sampling is done and there's a possibility of invasive prospecting in the form of drilling and the EA is being amended, then all the stakeholders need to be included as well. There is a lot of environmental authorizations for renewable energy projects in the area as well. So, you should be very careful here in order not to be counter-productive.	Noted. In the BAR there is a map from ESKOM that indicates the area for the solar plants planned.	N/A
		Just for clarity: Sampling first phase then possible invasive and then bulk sampling?	Drilling is the most invasive that Salene may implement in future. No trenching is planned.	N/A
		Our mandate from organized agriculture is to promote sustainable food security. If there is any ore and the owner has the mining right for those minerals than its his property. But, if its different minerals it's not his property and remains his liability. If there is agricultural zone land and there is commercial agriculture on that farm that's why we are from organized agriculture are always a part	Noted. Thank you.	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		<p>of the process to ensure that the effects on the neighbours are not that much. So, we need to mitigate this as well and we are not looking on specific farms that are owned by mining companies we are looking on all the properties in the area because there will be detrimental effects on everybody.</p>		
		<p>What are greenfields areas?</p>	<p>That's everything outside the mining area such as the agricultural areas where there hasn't been any mining or residential development that changed the nature of the environment there.</p>	<p>N/A</p>
		<p>It's still necessary for the transparency and to empower that you are to carry on with consultation with the landowners because the application area is so big.</p>	<p>Definitely.</p>	<p>Part B</p>
		<p>This prospecting right application reserves certain farms for future prospecting but we are primarily focused now on the areas that have or are undergoing mining activities. So, the EMPr is going to focus primarily on those areas that is currently affected. Assume that there is a possible feasibility of conducting future invasive prospecting activities then that whole EMPr will be amended and it will be the whole process again, consultations with the landowners, bigger footprint, etc. The major concern at this point in time is that there is no need for a water use license or to focus on a lot of the environmental issues because it is not on commercial part of the land, it's on areas that has</p>	<p>Yes, much more complex. The area also could be much smaller.</p>	<p>N/A</p>



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		already been disturbed. So, we will closely monitor the EMPr as well, so when that does occur and the environmental authorization needs to be amended then it's going to be more complex.		
		A lot of the farms can fall out. They will be included until the prospecting right lapses on those farms. The landowner always has to be included. So even though its privately owned land and the mining company with a mining right has an environmental liability they will also be consulted. As soon as there is privately owned land with a mining right, there should be some form of agreement between the landowner and the prospecting right applicant and the mining right owner as well.	Noted.	N/A
		If there is no agreement between the land owner or the occupier, no access will be granted.	Correct.	Part B
		Prescali Consultants are currently the EAP. They are conducting the whole study going on. They are in no way connected with the applicant. If the prospecting right has been granted, we will always promote that the EAP, Prescali, become the environmental control officer. With regards to the rehabilitation, because this application and the environmental authorization are only now going to be focused on areas that already mining areas which have a rehabilitation fund or guarantee to the	Noted.	Declaration of Independence



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		DMR, it is not necessary for the applicant to have a massive rehabilitation fund. For now, the EA is limited to only waste rock dumps. As soon as the EA is being amended the rehab cost will be much more.		
		Do not get confused between prospecting activities and mining activities. Closure certificates is more mining activities. It is not the responsibility of the landowner to be a policeman on his own property. It is the responsibility of the right holder to ensure rehabilitation is conducted. There should be an insurance premium take out which empowers the landowner and all the stakeholders to invoice that right holder to obtain funding for rehabilitation from that insurance policy.	Noted.	N/A
		If the prospecting right is granted and sampling should take place on the disturbed areas or mining areas and that mining company who has the environmental liability refuses access, what then?	It is probably going to happen. It the same as with a landowner, there is just a bit more rules with the mining company. There is a process in the MPRDA which states that you can inform the regional manager and the Department if you cannot get access and the Department has to then do a litigation process.	N/A
		As soon as the reserved farms are being already granted, the environmental authorization must be expanded. It will be a public participation process all over again. Fire protection associations will be registered when the application becomes bigger.	Noted,	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
Landowners or lawful occupiers on adjacent properties				
Allen Penny Farmer on Portion 0 of the Farm Riviera 335	15/11/2022	1) Just for clarity sake, is there any representatives from Salene Manganese here?	1) Mr. Neels Hoek indicated that he is the Salene Manganese representative.	N/A
		In which capacity? From a legal perspective or just an advisory perspective?	Mr. Hoek is representing in an advisory capacity.	N/A
		Can you tell us more about Salene Manganese because we don't know who they are or what they are doing, etc.? The only thing we personally know and see is the licenses and issues and that sort of thing.	Salene Manganese is a private company. They do have one mining right in the Kathu area to mine manganese and iron ore on the Farm Macarthy. They also hold several prospecting rights. As part of their Macarthy operations, Salene identified certain minerals that may occur or may not occur such as rare earths and so on. So, the whole process of this application is to see what is the possibility of these minerals where they may occur in an economically viable situation where they can mine them. So, these applications are only for sampling. If and or if there's a possibility that there are economically viable resources somewhere then the application will be expanded to do drilling and further exploration activities on. Salene Manganese has been there for some time and they are also linked to other mining companies, where the owners are involved in chrome mining. So, it is an established company and not a fly-by night company.	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		For how long are the operating in South Africa now? Is it a local based company?	It is a local based company. They have been in South Africa for 50 years. The owners are South Africans citizens as well. They do have companies, for instance the companies that are linked to them, that are overseas companies.	N/A
		Just for clarity's sake the method that they will use for sampling is that going to be pits or trenches? Is the methodology clear in your application?	There will be no pits and no trenches. For this phase of the application, they will use a pick and shovel. They call it grab sampling, so they will take a sample and leave. It has been made clear in the BAR that if drilling is required there will be an amendment to the environmental authorization.	Part A, Section 4
		How are you going to monitor access control?	Because the current sampling is on operational mining areas, access control will have to be provided by the mining companies. We anticipate that for this specific phase, it will probably be one vehicle with the geologist and an assistance on site.	Part A, Section 4
		So will the guys be documented with ID's, photos and all that type of things?	Yes, every point will be documented with the coordinates and a photograph. And as I said earlier, you will be formally notified before anybody comes to your property.	Part B, Section 10
		What method do you have in place to keep the whole setup as far as possible to a minimum?	The reason as to why the impacts are low is because it is on existing residue deposits and residue stockpiles. So, no natural environment can be impacted here for this application. If they decide to go ahead with the drilling, the impact ratings will jump to	Part A, Section 4, Part B



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			high or very high as a bigger area is impacted.	
		Who is going to take ownership for contact between the farm owner and the mining company?	Mr. Anthonisson also indicated that the landowner already has a right, the mining company already has a right there's an agreement between those parties, so the third party which is Salene Manganese if they are successful with their application, it's their responsibility to start the discussions with the two parties".	Part B
		Because we know from experience that guys just pitch up to the property and show a license and demand entrance.	The landowners have to be consulted before the process begins. There must be a surface lease agreement stating what can and cannot be done on the property.	Part B
		Where will the environmental control officer be situated? What are his functions and duties?	Some bigger companies have their own environmental control officers who go to do site inspection to see if they are following the conditions of the EMPr. For this application due to it is potentially in house, because it is such a small sampling phase that the person who goes with the geologist or the geologist himself might act as the environmental control officer.	Part B
		Have you made provisions for rehab?	Before an environmental authorization is issued, the Department will request Salene to provide a bank guarantee for a certain amount that is calculated for rehabilitation. For this sampling it will not be much. In terms of NEMA annual financial provisional assessment needs to be conducted	Part A, Section 21



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			<p>which must be done by an independent EAP. For this application a 1m X 1m per sample area was used because its only waste rock dumps, it was very little about R5000 to R7000. But the DMR will confirm this value.</p>	
<p>Gert Theart Olivewood and Epsom</p>	<p>15/11/2022</p>	<p>Is there any documentation stating that sampling can occur?</p>	<p>We have very specifically indicated where the sampling locations are. So, if any of you here feel that we are in contradiction of the EMPr that will be approved by the DMR, you can tell the people that they are not allowed on the property. Let's say this application gets approved, then still no one is allowed to just come onto your property. The legislation makes it very clear that there needs to be proper notification. And also in all cases, if somebody wants to access your property or start drilling, etc. you need to have an access agreement between the properties. What you are and not allowed to do.</p>	<p>Part A, Section 2, 3</p>
		<p>The part where they are supposed to sign off to say that the farm was rehabilitated, is there a document to say that the farmer is happy with the rehab?</p>	<p>Yes, when you are done with your prospecting or mining you need to apply for a closure application and appoint an independent EAP who will do a risk assessment and also determine whether everything you committed to in your environmental authorization has been done. The Department will also insist that the landowner must be notified and they will have to sign off on the process</p>	<p>N/A</p>



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
G. J. Stols Dikgathlong	15/11/2022	Who is responsible to see that the rehabilitation process is done as the Department is making it the responsibility of the land owner to ensure that the rehabilitation is done?	In terms of the EMPr, the prospecting right holder or the mineral right holder they are responsible to make sure that rehabilitation takes place as per the requirements in the approved documentation. If they haven't done the approved rehabilitation, you can lodge a complaint with the DMR to say that they didn't follow the requirements of the EMPr. External audits are required to be conducted by the company to see if they are complying.	Part B
Basi Manemo Mokala	15/11/2022	How are you planning to move forward with the eight appeals?	Salene has drafted a response to the appeals and that will be submitted to the DMR and the attorneys.	N/A
		So, does that mean you cannot actually start with the sampling process?	Yes, well there is no right yet. We are still in the application phase. Those appeals need to be addressed as well by the Department. The applicant will make sure that these appeals are dealt with in a timely process.	N/A
		So, when you say there is no right, are you talking about the mining right?	This application is still in the application phase. It's only been accepted. So, what it means it that we can go and prepare the necessary reports and submit all those documents to the Department. So, Salene Manganese doesn't have any right or authority at this stage to enter any of the properties for exploration activities to be done.	N/A
Municipal councillor		None to date		
Municipality		None to date		
Organs of state (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, DWA)				



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
John Geeringh	26/08/2022	Please send me a KMZ file of the affected properties and proposed prospecting footprint. Please find attached Eskom requirements for works at or near Eskom infrastructure and servitudes.	KML file was send and the ESKOM requirements is added to the BAR as requirements for compliance.	Part B, Table 5-1
John Geeringh	26/08/2022	Eskom has some major developments planned at the Umtu substation within the prospecting area. I have forwarded your communication to the relevant portfolio manager.	KML file was send and the ESKOM requirements is added to the BAR as requirements for compliance.	Part B, Table 5-1 and Figure 5-1
Natasha Higget - SAHRA	11/11/2022	<p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of the impact to heritage resources be undertaken as part of the EA process that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA. The HIA must include an archaeological and palaeontological component. Many of the manganese mines in this area are older than 60 years and therefore, some structures may be protected in terms of section 34 of the NHRA, this includes mine dumps as per section 28(1)c of the NHRA.</p> <p>The field-based archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists).</p>	We have had many appeals from the mining companies on who's residue deposits and stockpiles the proposed grab samples will be taken and I am not sure that the requested archaeological and paleontological studies can be done until such a time that the prospecting right is issued. Would it be acceptable that once the prospecting right is issued and the grab samples is taken from the dumps that the geologist is accompanied by an archaeologist and a palaeontologist and that they both generate reports on their observations and findings to be submitted to SAHRA?	Outstanding



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		<p>The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.</p> <p>The proposed development is located within an area of moderate and high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. Some of the mined material within the dumps may contain previously uncovered fossils. As such, desktop based Palaeontological Impact Assessment (PIA) is requested to be undertaken by a qualified palaeontologist. (See https://www.palaeosa.org/heritage-practitioners.html for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a field-based assessment should the Letter of Recommendation not provide ample information to make an informed comment.</p> <p>Any other heritage resources as defined in section 3 of the NHRA that may be</p>		



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewscapes must also be assessed.		
	28/11/2022	As noted in my SAHRIS message response, a desktop assessment may suffice if access is restricted. Based on the desktop assessment, it can then be decided if the below suggested action is required.	Costing from specialists were requested and documentation will be submitted to SAHRA.	This Table.
Communities				
Dept. Land Affairs				
Natasha Romain	26/08/2022	No land claims appear on the database for the properties indicated.	Noted	N/A
Traditional Leaders				
Dept. Environmental Affairs				
Jacoline Mans	01/11/2022	The proponent must assess the sites for the presence of protected treed species that may not be cut, disturbed, damage or destroyed. Species such as Vachellia erioloba, Vachellia haematoxylon and Boscia albitrunca are known to occur in the vicinity of the sites earmarked for prospecting	Noted and document updated to reflect.	Part A: Table 6-1, Section 10.7.1
		Should an application for a Forest Act Licence application be submitted the Department would need copies of supporting documentation such as the approved Environmental Authorisation (EA), Water Use Licence (if applicable) and Flora Permit.	Noted	N/A
		The report refers to the former Department of Agriculture, Forestry and	Noted and reference corrected.	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		Fisheries which no longer exist. Kindly take note that the Forestry Branch is now in the Department of Forestry, Fisheries and the Environment (DFFE).		
		It not clear if drilling in non-disturbed areas might take place, as the statements in the report seem to contradict each other.	Noted, all references to drilling were double checked and removed where not applicable. We can confirm that should a second phase of prospecting be identified that a separate application will be lodged for any activities that may be triggered in terms of NEMA.	This Report
		Aspects for inclusion as conditions of Authorisation: 9. Disturbance of protected trees and plants are not permitted without the necessary Forest Act Licence and/or Flora Permit (both may be required), obtainable for the relevant Departments whose mandate it is to issue such permits and licenses. 10. The holder of the Environmental Authorisation (if granted), must appoint a suitably qualified specialist to do a search and rescue of plants of conservation concern that can be relocated successfully (after	Noted and included in Report.	Part B Section 16
Other Competent Authorities affected		None received to date		
OTHER AFFECTED PARTIES				
Michelle Dalgety - Agri Kuruman	02/10/2022	1. Groundwater yield and susceptibility to contamination	1. It is highly unlikely that the proposed sampling process as per this application will impact on	Part A, Section 10 and Table 11-4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			groundwater yield and result in contamination:	
		2. Dust and noise generation through connected activities	2. It is highly unlikely that the proposed sampling process as per this application will impact on dust and noise generation through connected activities	Part B of the report
		3. Sufficient and acceptable mitigation of agricultural land-use	3. The current sampling area is located on existing residue stockpiles and thus will not impact on agricultural land-use. Should future activities be deemed feasible an amendment will be applied for and the impacts re-assessed.	Part B of the report
		4. Rehabilitation	4. The current sampling area is located on existing residue stockpiles thus rehabilitation will focus on the immediate area impacted by the sampling as it is located on existing residue stockpiles	Part B of the report
		5. Impacts on the agricultural economic units"	5. It is highly unlikely that the proposed sampling process as per this application will impact on the agricultural economic units as the sampling points are located on existing residue stockpiles. Should future activities be deemed feasible an amendment will be applied for and the impacts re-assessed.	Part A, Section 10 and Table 11-4
M. Reynecke Agri Kuruman	15/11/2022	So those are the only sample points?	Currently, yes.	Part A, Section 2, 3, 4
		Then why is the application area so big?	This application is being conducted in a phased approach. If the results from this indicates that the geology does not include the minerals applied for	Part A, Section 4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			then they will expand to the other areas.	
		Based on the sampling results, you will jump directly to prospecting, let's say on the Farm Wessels?	Yes, but that will go through a public participation because drilling will trigger additional activities that will require authorization and the DMR will also be notified. So, if Salene decides to go ahead with that then there will be an amendment process that the DMR will state.	N/A
		If your samples came from 30 km away on certain farms, will you then base the drilling on a sample that is not even on that same property?	Only on the application area, but it should be remembered that the geology formation is slightly ascend to that area. So, the geologist will, based on samples, say that certain areas will be taken out of the application and certain areas will stay.	N/A
		If you look at the whole application area and you are at the furthest point on an application area and take samples and based on the furthest point samples you are going to drill on the opposite end of the application area. How?	That is a question for the geologist. The fact of the matter is Salene want to determine where there is an ore where the applicable minerals occur. It is known in Macarthy but Salene want to see if it's in this area as well and based on that Salene will expand the exploration process because this entire area here has only supported iron ore and manganese. It hasn't really supported the occurrence of other minerals. It is thus an unknown and Salene would like to determine if there is a possibility if the minerals may occur in economically viable volumes. Because it may occur but in such minute occurrences that it is not economically viable and then Salene	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			will cancel the prospecting right. So, samples need to be taken in certain areas and from there Salene will expand the exploration process.	
		It's been said now that there will be an amended EA but you highlighted the fact in your prospecting works program that according to the MPRDA, if you take samples on tailings dams, no prospecting right needs to be applied for. So, how do you determine which is tailings dams and which is not and your environmental impact? Who is actually responsible for the rehab of that? You have also made provision for trenching even though you said you are not going to do trenching and trenching can be seen as bulk sampling.	Rehabilitation for this phase of sampling will be to ensure that the sampling process does not leave holes / depressions that could impact on safety of machinery or people on the residue deposits.	Part B
		The prospecting right is also a full EIA process and full EMP. But you said that it's not necessary because it's going to be on tailings dams. I don't understand?	In the prospecting works program Salene have detailed the different types of exploration that can be done, but for this application only sampling will be done. Should any of the other activities be considered there will be an amendment for the prospecting works program and the environmental authorization. Two different types of dumps are highlighted. The ones that were placed there before the MPRDA came into effect in 2004 and which are privately owned and do not form part of the MPRDA. For those types of dumps, the company that owns them actually sells them and you don't need a prospecting right or a mining right to mine those dumps or to process those	Part A, Section 4



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
			dumps. You only need an environmental authorization but as part of this application, we cannot actually access those dumps. But that information about whether the dump is privately owned or whether it forms part of the MPRDA, only the owner knows. So, once we want to go and do explorations, we will need to consult with that specific company.	
		Then why are you applying for a prospecting right if you only need an environmental authorization?	Because not all the dumps that we are trying to access are actually privately owned and was created after the promulgation of the MPRDA.	N/A
		But why do you need a prospecting right to do sampling?	For any exploration, you need a prospecting right.	N/A
		If you get the prospecting right, then you will get the right to drill?	Salene will not be allowed as the environmental authorization applied for excludes drilling at this stage.	N/A
		Is the whole application area of mine owned properties?	No. the sampling is on mine owned properties.	Part A, Section 2, 3
		When you do the application for drilling, will we have to go through this process again?	Yes, the comments and concerns raised here will assist the identification of management measures for future phases of exploration.	Part B
		It is a concern the amount of agricultural land that is within the application. Who is responsible for rehab?	Departments will also assist. The different mining companies will have to contextually agree as to who is responsible for what. The documents thereof are public documents.	Part B
		Will the EA, final draft of the comments, minutes of meeting be circulated and final BAR?	Yes. the Final BAR will be made available again. The minutes will be forwarded. This presentation will also be circulated.	N/A



Interested and Affected Parties	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph
		No sampling will be done till the prospecting right will be registered?	Only after the environmental authorization is approved, will the Department grant the prospecting right application because they look at other things as well.	N/A
INTERESTED PARTIES		None received to date		



10. THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE ALTERNATIVES.

(The environmental attributed described must include socio-economic, social, heritage, cultural, geographical, physical and biological aspects)

10.1. Regional Location

The prospecting application area is located within Ward 4 of the Joe Morolong Local Municipality and John Taolo Gaetsewe District Municipality (Figure 10-1) on the following farms: Olive Pan 282, Gama 283, Telele 12, Dikgathlong 268, Dibiaghomo 226, Boshof 300, Roldraai 333, Drakenstein 263, East 270, Umtu 281, Olivewood 284, Mooidraai 310, Kongoni 311, Smartt 314, Middleplaats 332, Klipling 271, Hotazel 280, Epsom 285, Tigerpan 286, Botha 313, Mukulu 265, Gloria 266, Wessels 227, Adams 328, Belgravia 264, Mamatwan 331, Sinterfontein 748, York 279, Devon 277 and Perth 276.

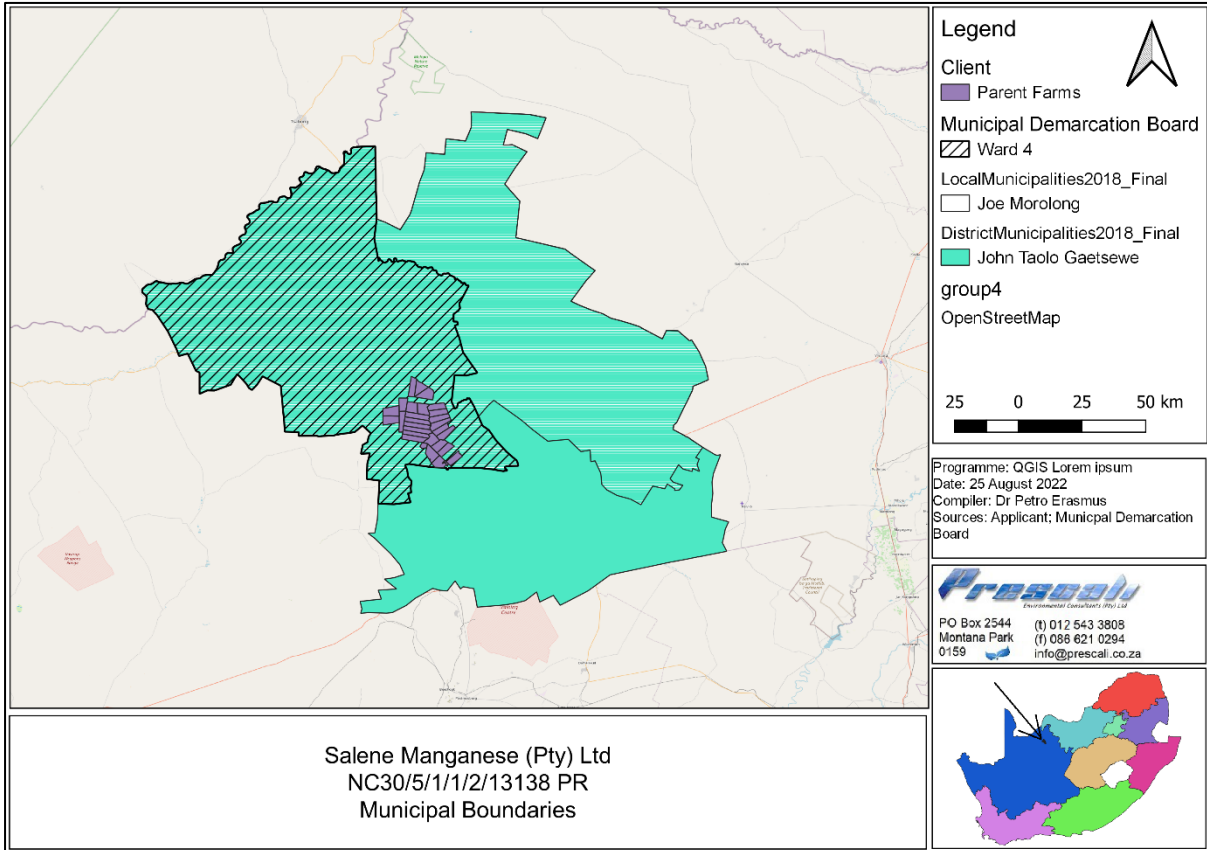


Figure 10-1: Location within District and Local Municipality Boundaries

10.2. Climate

10.2.1. Regional Climate

Simulated climate data for Hotazel were sourced from MeteoBlue³⁵ and can be described as semi-arid with rainfall predominantly falling in the summer and early autumn. Maximum temperatures may vary between 21°C and 35°C (Figure 10-2).

³⁵ https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/hotazel_south-africa_995397, August 2022

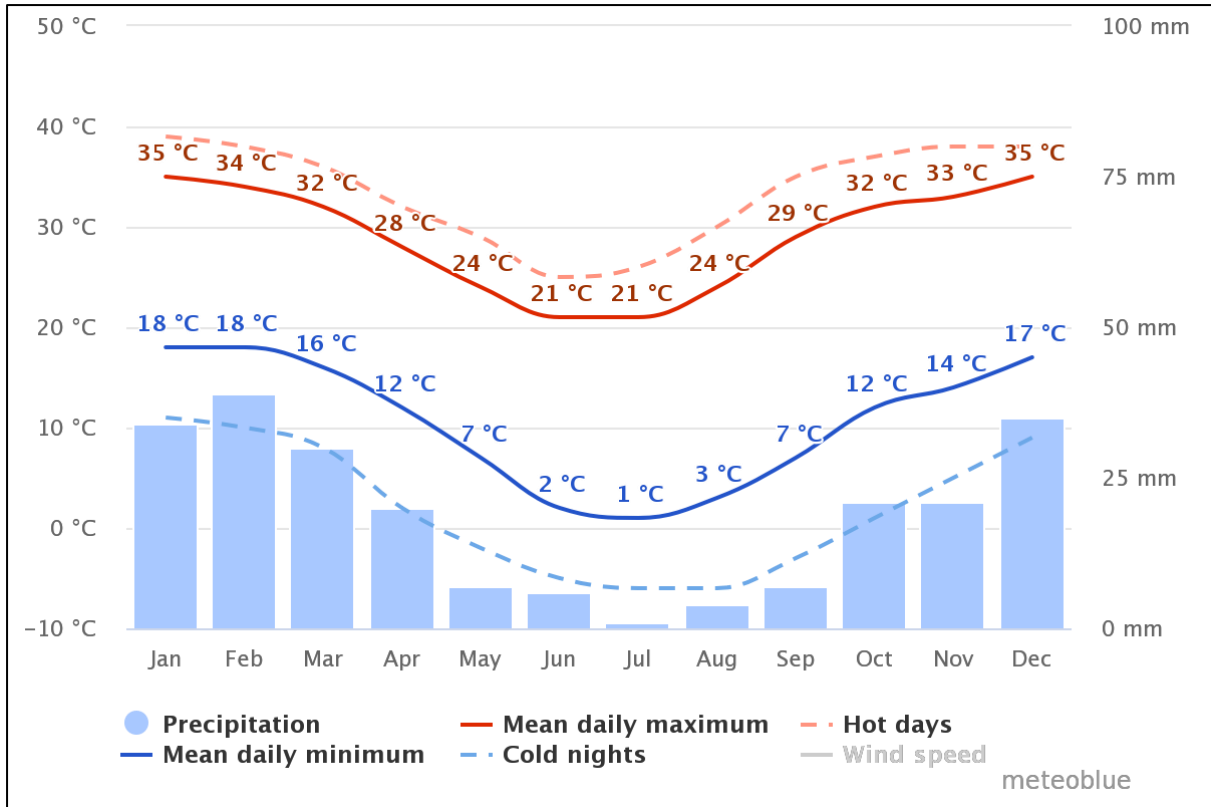


Figure 10-2: Simulated Hotazel Climate³⁵

10.2.2. Rainfall

Rainfall records extending a period of 40 years (Thari Resources (Pty) Ltd, 2012) for the Sishen Weather Station (Station No. 0356857AX) show that the mean annual precipitation (MAP) is 349 mm. The majority of rain falls in the late summer months of December, January, February and March, whilst the lowest rainfall records are recorded for the months of June, July and August (see also simulated climate for Hotazel, Figure 10-2). From the Sishen data, rainfall tends to vary widely over the years as typical of most arid and semi-arid climates. From the data available from WR2012 (Baily & Pitman, 2015)) it indicates that the proposed prospecting area is located in a rainfall area of 204 – 388 mm per year.

Table 10-1: Rainfall as recorded at Sishen (Thari Resources (Pty) Ltd, 2012)

Rainfall	Sishen		
	Average	Minimum	Maximum
Total	349	105	1086
January	70	0	418
February	56	0	291
March	62	0	275
April	33	0	130
May	12	0	101
June	6	0	79
July	2	0	18
August	3	0	51
September	8	0	51
October	23	0	91
November	31	0	132
December	55	0	276

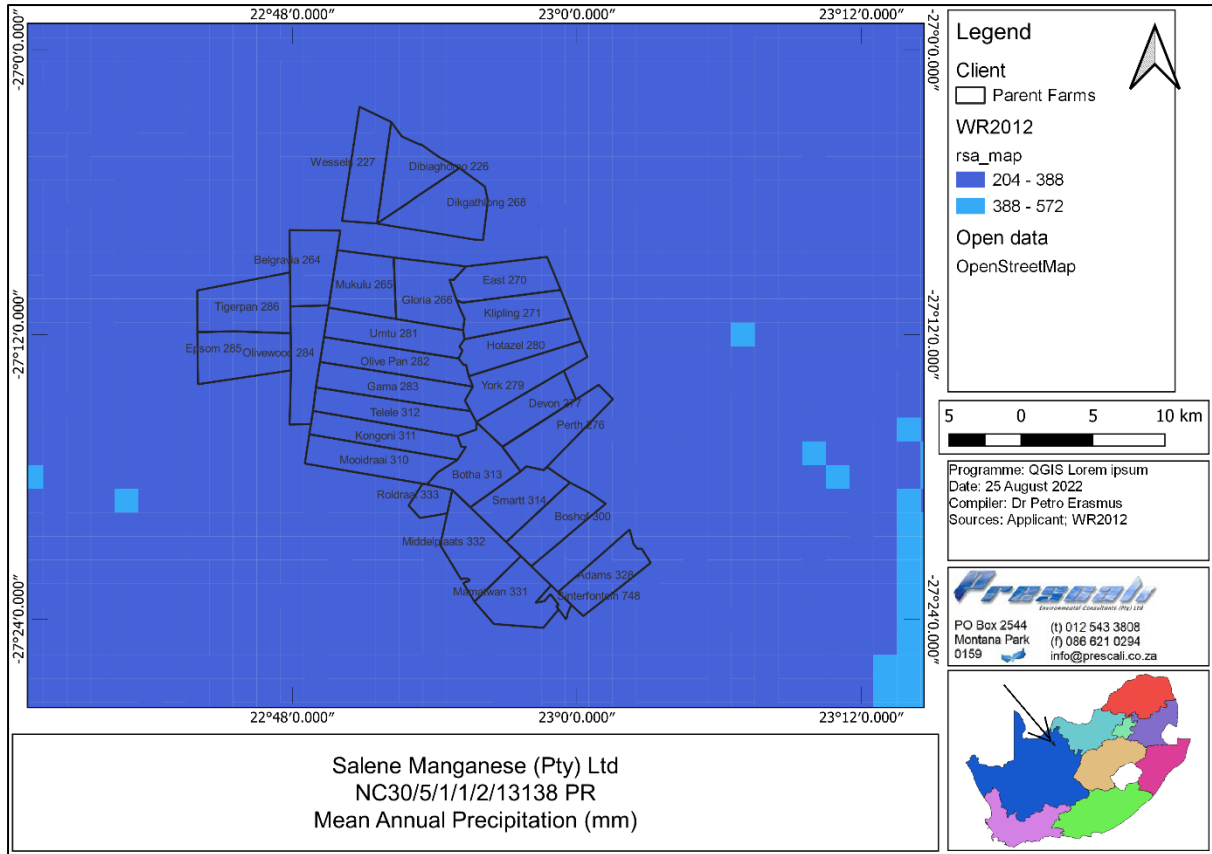


Figure 10-3: Mean Annual Rainfall Map (WR2012)

10.3. Evaporation

Figure 10-4 shows that the evaporation within the proposed prospecting area is greater than 2600 mm per annum which contributes to the arid conditions in the area.

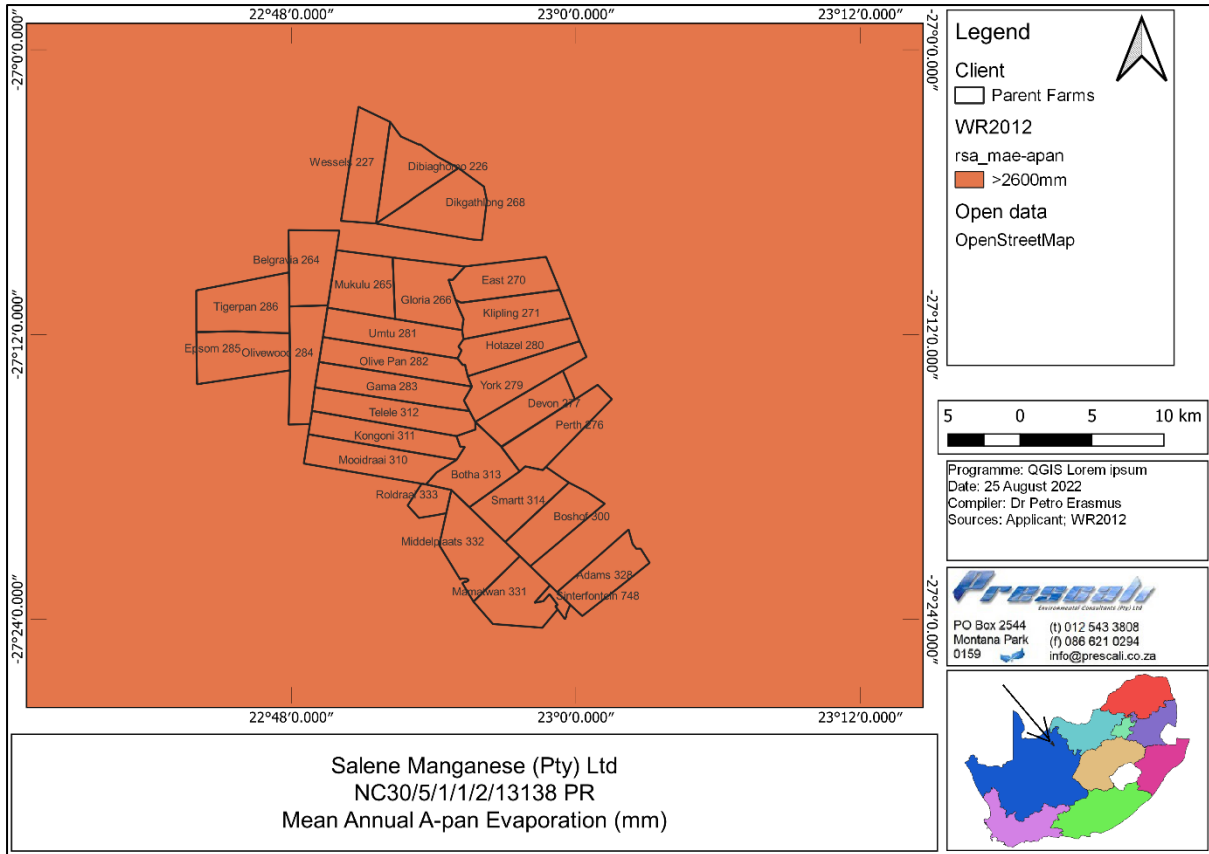


Figure 10-4: Mean Annual Evaporation Map (WR2012)

10.4. Topography

The topography of the general area is indicated in Figure 10-5 (Google Earth™) and Figure 10-6. From the contour lines it can be seen that there is a mountainous area (elevated) on the eastern side of the of the application area and on the western area there are what appears to be ridged running in a south westerly direction. It can be concluded that the prospecting area topography range from flat to undulating terrain. The topography for the 500 m radius for each of the 12 proposed surface sampling points is mainly residue deposits / stockpile areas and no longer in its natural condition.

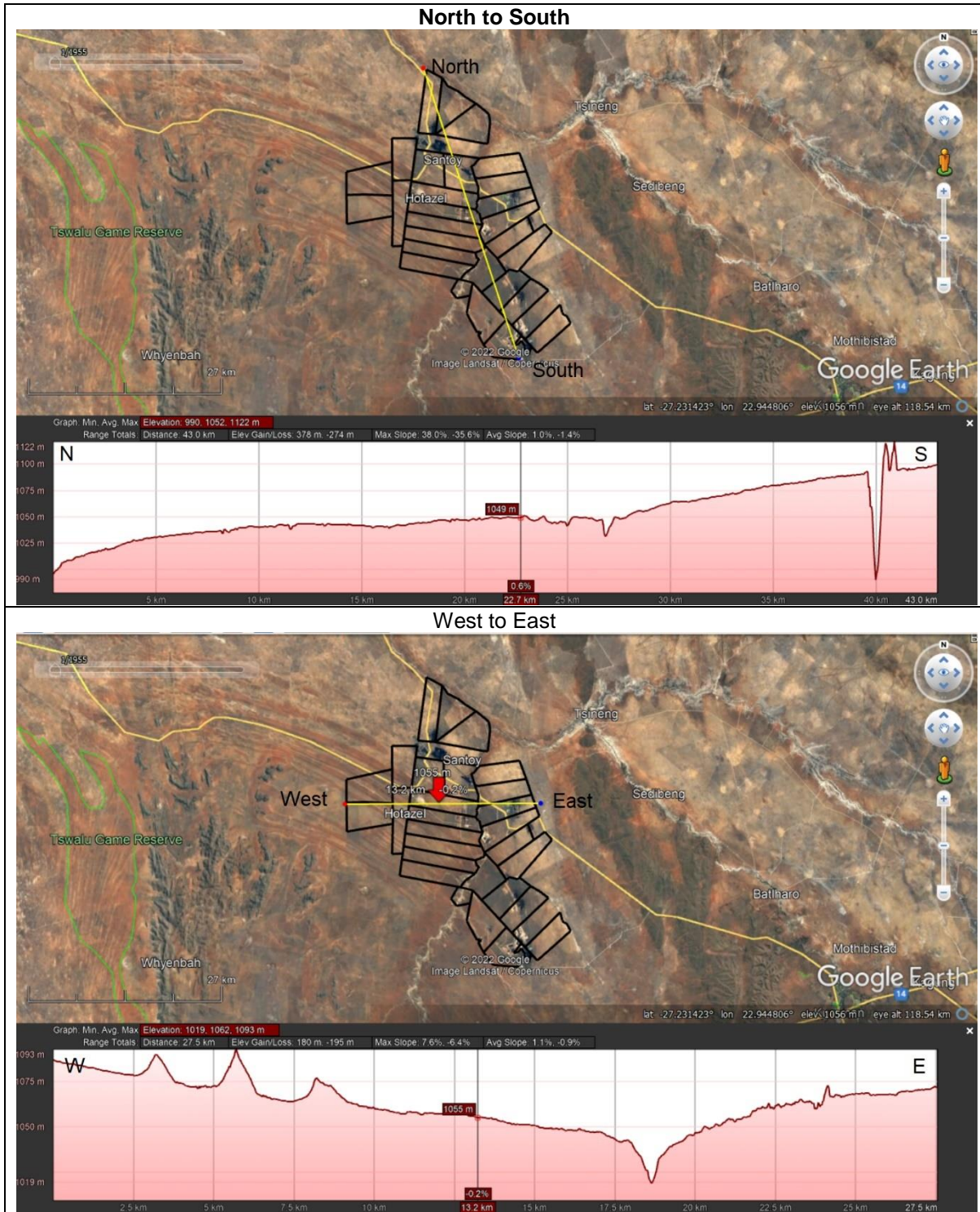


Figure 10-5 : Topography of the Prospecting Right Area (Google Earth™)

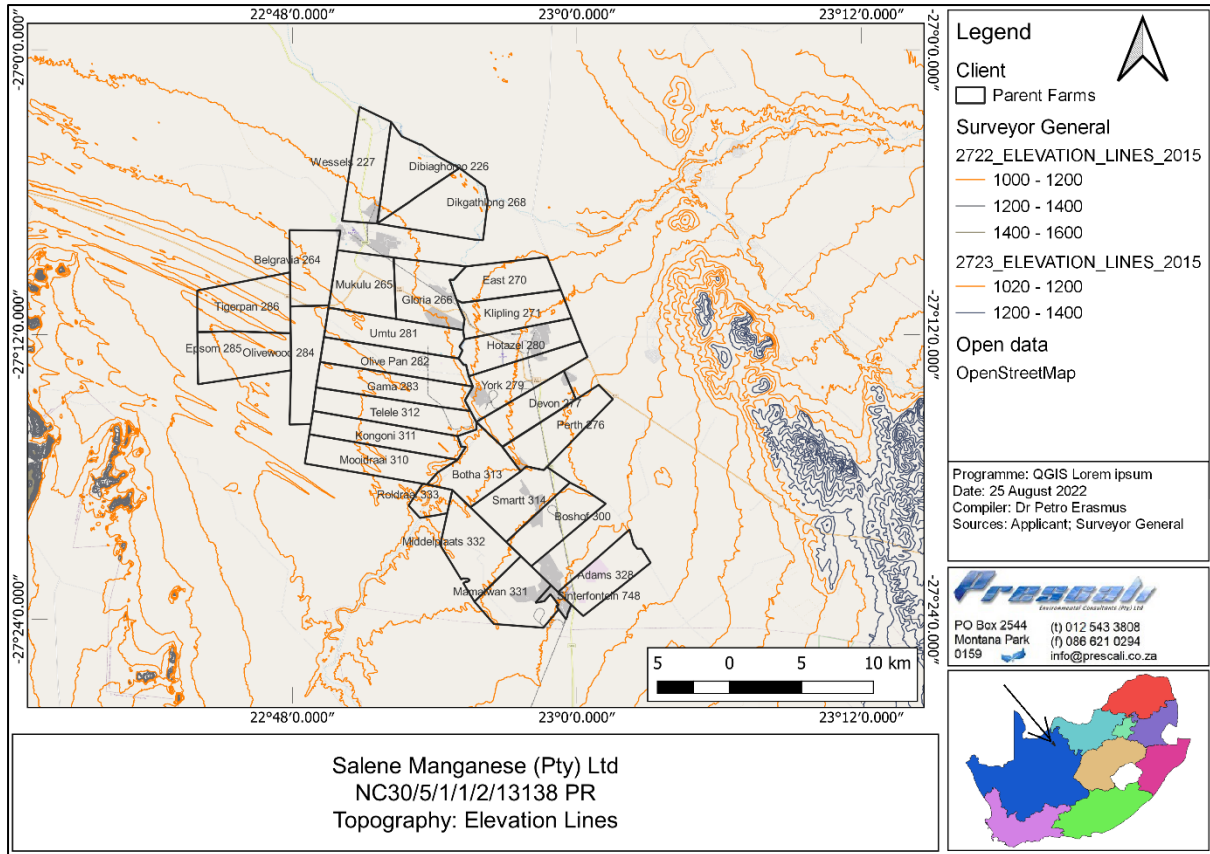


Figure 10-6: Elevation lines across the Prospecting Right Area

10.5. Geology

The regional geology is shown in Figure 10-7 as per the Mine Works Plan.

10.5.1. Regional Geology

The proposed prospecting area form part of the of the well-known Northern Cape, Kalahari Manganese field (KMF). The KMF lies northwest of Kuruman and consists of five structurally preserved erosional relics of the Hotazel Formation which comprises Superior-type iron formation with interbedded units of manganese ore. The Mamatwan-Wessels basin (or main Kalahari deposit) is the largest of the five deposits, comprising a basin with a strike length of 41 km and width varying between 5 and 20 km . The total area underlain by the basin is about 425 km² (Miyano and Beukes 1987 as cited in the Mine Works Plan (MWP)). Of the other four deposits, the Hotazel and Langdon Annex deposits, which lie east of the main deposit, have been virtually mined out. The Avontuur and Leinster deposits lying north of the main deposit are small and of subeconomic grade. Almost the entire manganese field is covered by the Kalahari Formation, the only outcrop being at Black Rock, where the Hotazel Formation forms a small koppie. In the southeastern portion of the basin, the Hotazel Formation is near surface and is directly overlain by the Kalahari Formation. The middle body is only 1-3 m thick and thus subeconomic. The average thickness of the upper body is 5 m and limited exploitation of this unit has taken place (Miyano and Beukes 1987 as referenced in the MWP). In the southern portion of the KMF, however, the upper body may reach 30 m in thickness and the middle body is often absent. The amount of the sequence preserved in any area is related to the severity of paleo-erosion.

The lower manganese body is characterised by a braunite-kutnahorite mineral assemblage and is considered to represent a primary to early diagenetic sediment. This is referred to as Mamatwan-type ore and represents approximately 97% of the total manganese resource of the Kalahari deposit (Miyano and Beukes 1987 as cited in the MWP). Along the northwestern margin of the area, intense faulting, thrusting and associated hydrothermal activity have removed carbonates and silica, thereby upgrading the ore to a coarse-grained braunite 11- hausmannite-bixbyite assemblage, known as Wessels- type ore (Miyano and Beukes 1987; Gutzmer and Beukes 1995 as cited in the MWP). The transition from Mamatwan- to Wessels-type ore is not well constrained. Local thrusting has duplicated the ore horizon in places, as is the case at Wessels and Black Rock. The Hotazel and Langdon Annex deposits



represent portions of the Hotazel Formation that have been downfaulted into graben structures. Here, hydro- thermal and supergene enrichment have produced an ore with a manganese content in excess of 60 %, often referred to as Hotazel supergrade ore (Miyano and Beukes 1987 as cited in the MWP). The Avontuur and Leinster deposits contain a low-grade jacobsonite type of ore.

The prospecting area have been investigated in detail by many companies in the past, but mainly for manganese and iron only. Salene Manganese will focus on the potential occurrence of other minerals in the area which is still largely unknown. Recently obtained information and references in old literature, corroborated by anecdotal evidence do, however suggest the presence of other types of mineralization (which have a comparable history of origin and deposition to the manganese mineralization) in the area as well. During routine multi-element analysis of exploration samples (on the farm Macarthy 559), elevated concentrations of certain elements were detected. Such levels of concentration are considered to warrant further investigation (exploration) on these, and associated elements as listed in the application

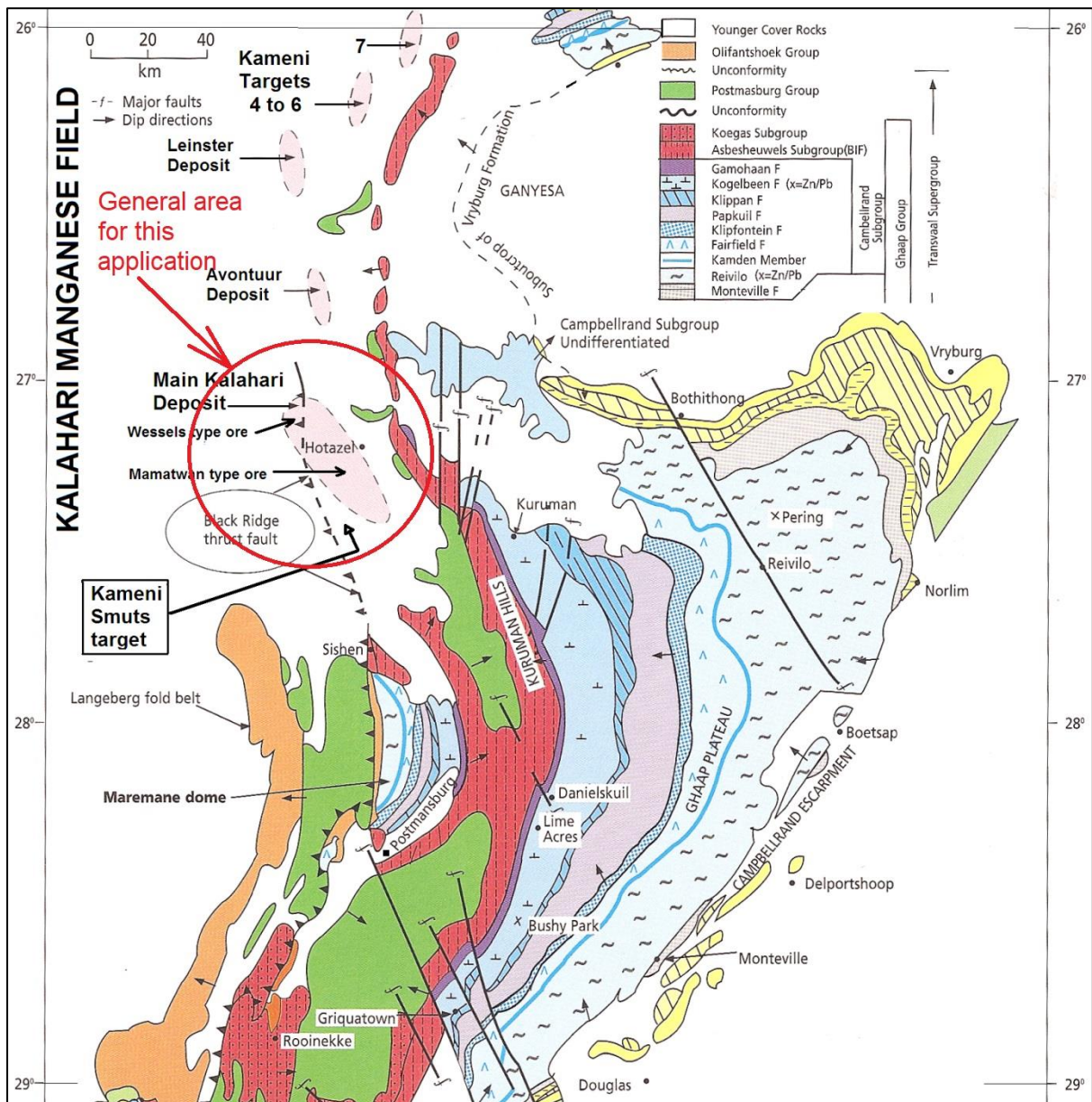


Figure 10-7: Simplified geology map of the Postmasburg and Kalahari manganese fields (Figure adapted from Cairncross et al, 1997 as cited in the Mine Works Plan)

10.5.2. Site Specific Geology

Site specific information as applicable to some of the farms included in the prospecting area was sourced from available reports and it is believed that this geology may be applicable to most of the



prospecting area. Should a second phase of prospecting be identified site specific geology information will become available during such exploration.

Gloria 266 Kipling 271 and Umtu 281 (Nariansamy, M. & Smyth, N., 2021): The Hotazel Formation on these farms is overlain by Early Permian Dwyka diamictite (tillite) of the Karoo Supergroup or Cenozoic Kalahari calcrete, clay and windblown sand. From the information available, the general stratigraphy on these farms consists of the following:

- Kalahari Formation (or "beds"), consisting of sand, clay and limestone;
- Dwyka Formation, consisting of tillite);
- Mooidraai Formation, consisting of dolomite;
- Hotazel Formation which consists of Banded Iron Formation (BIF). The ore is contained within a mineralised zone which is made up of three manganese rich zones; the Upper Manganese Ore Body (UMO), the Middle Manganese Ore Body (MMO) and the Lower Manganese Ore Body (LMO); and
- Ongeluk Formation, consisting of basaltic lava.

10.6. Soil and Land Capability

On a regional scape (all properties forming part of this application) the following soil series were identified (Figure 10-8):

- 3 Clovelly (Cv30/Cv33) - 45 Hutton (Hu30/Hu33) - 40 Fernwood (Fw20); and
- 3 Hu31/Hu34 - 60 Hu36 - 20 Mispah (Ms10).

Available information on Gloria 266 Kipling 271 and Umtu 281 (Nariansamy, M. & Smyth, N., 2021) indicate the presence of the following soil types Clovelly, Molopo, Witbank, Brandvlei and Kinkelbos. The soils are very sandy (90% sand fraction), while in the Ga-Mogara drainage channel the clayey-sand texture consisting of 18 to 24% clay particles and 72 to 80% sand particles.

It is highly likely that Anthrosols (heavily modified soil types) will also be present within the prospecting right area.

Due to the sandy nature of the soils in the area it has limited agricultural potential (Nariansamy, M. & Smyth, N., 2021).

Given the limited rainfall, lack of irrigation and high temperatures in the area, none of these soils are likely to contribute to sustainable national food production. The soils are therefore not considered sufficient for viable cultivated commercial farming and only considered marginal suitable for small scale commercial livestock farming.

Table 10-2: Land Capability Classes for soil forms within the proposed prospecting area

Land Capability	Soil Forms
Arable Class II	Hutton (Hu)
Arable Class II	Clovelly (Cv)
Grazing- Class V	Mispah (Ms)
Class IV, V or VI – Low suitability	Fernwood (Fw)
Wildlife/Wilderness – Class VIII	Anthrosols
Non-Arable	Built up areas e.g., residential, mining, commercial, access roads

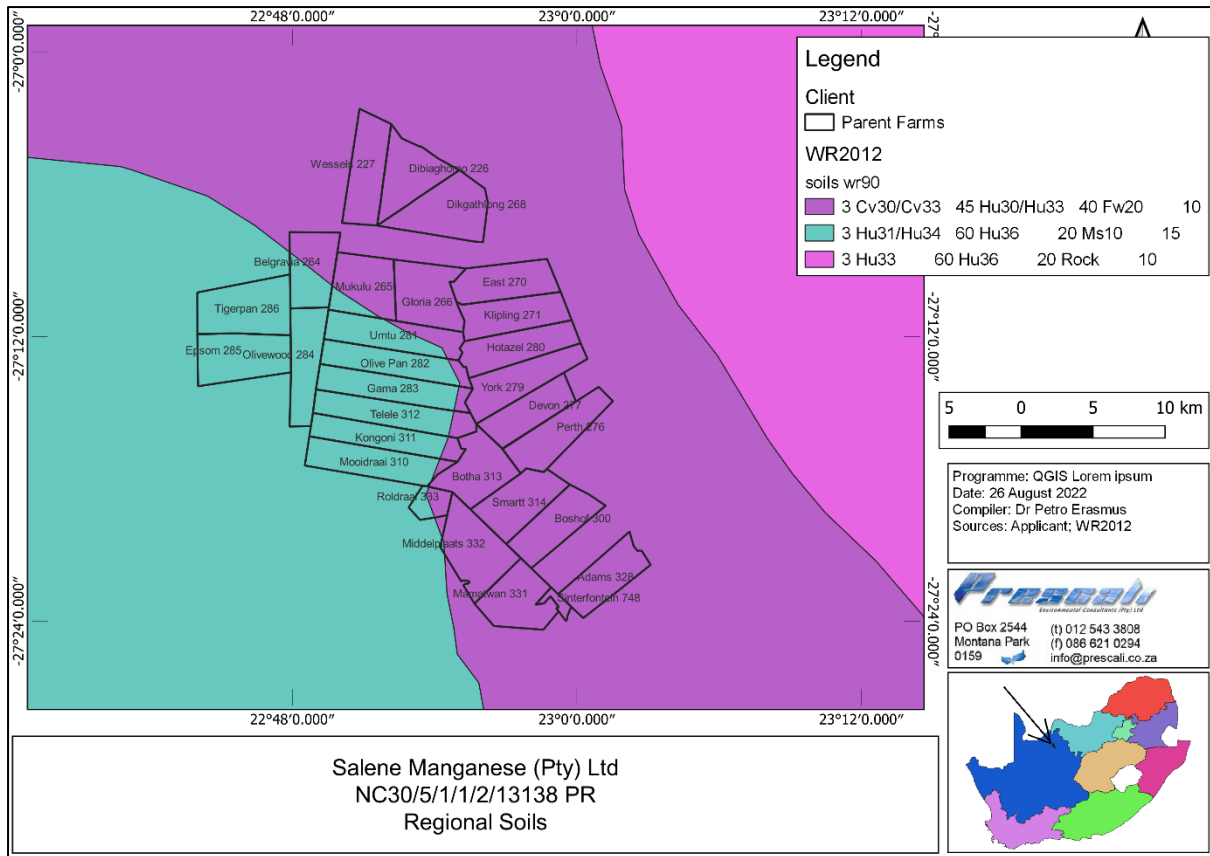


Figure 10-8: Generalised Soil Map

10.7. Terrestrial Biodiversity

The desktop assessment indicated that the proposed prospecting area falls within the following classification areas in term of biodiversity as per the Northern Cape assessment done in 2016 (Figure 10-9):

- Critical Biodiversity area 1: northern part of the application area;
- Ecological support area: mostly associated with drainage lines and outcrops as noted in the topography section (Part A: Section 10.4);
- Other Natural areas: most of the application area; and
- Unclassified areas that are located at active mining areas.

Sampling site assessment in terms of the CBA areas indicated the CBA classifications (Figure 10-10, Figure 10-11, Table 10-3).

Table 10-3: CBA classification comparison with Google Maps™ verification

Sampling site: 500 m radius	CBA Classification	Google Maps™ verification
1	N/A and Other natural	Residue deposit & Other natural
2	N/A	Residue deposit & Other natural
3	N/A and Other natural	Residue deposit & Other natural
4	N/A	Residue deposit & Mining
5	Other natural	Residue deposit & Other natural
6	N/A and Other natural	Residue deposit & Other natural
7	N/A	Residue deposit & Other natural
8	N/A and Other natural	Residue deposit & Other natural
9	N/A and Other natural	Residue deposit & Other natural
10	N/A, ESA1 and Other natural	Residue deposit & Other natural
11	N/A, ESA1 and Other natural	Residue deposit & Other natural
12	N/A and Other natural	Residue deposit & Other natural

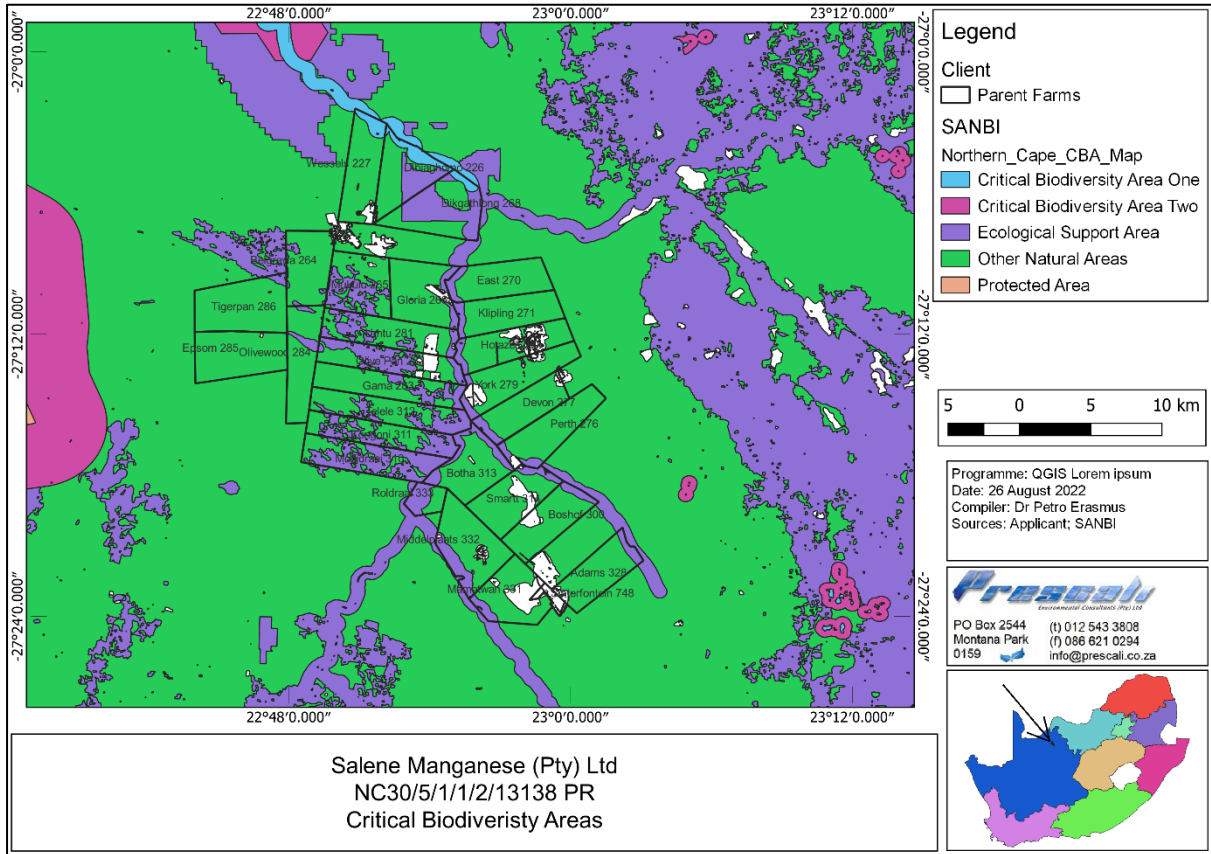


Figure 10-9: Critical Biodiversity Area (CBA) Map – whole prospecting area

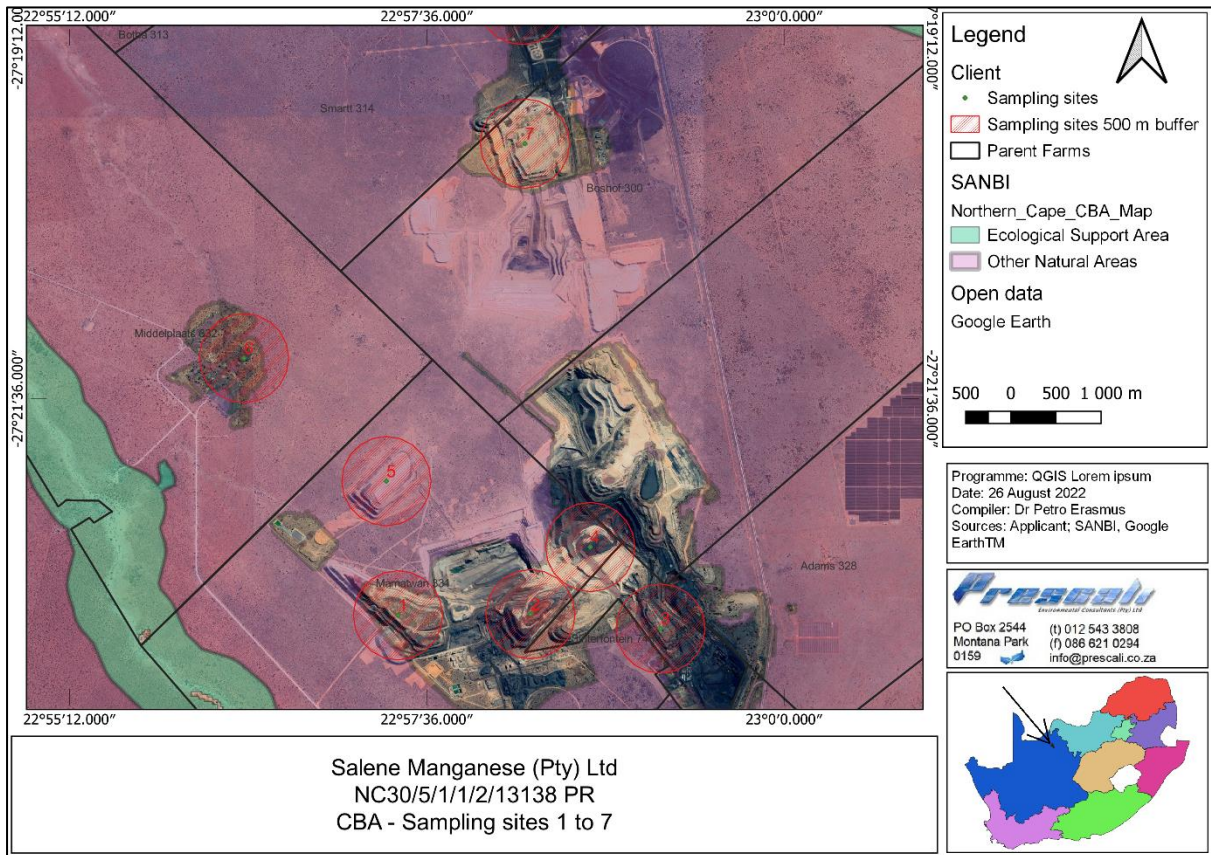


Figure 10-10: CBA at proposed sampling sites and 500 m radius boundary – Sites 1 to 7

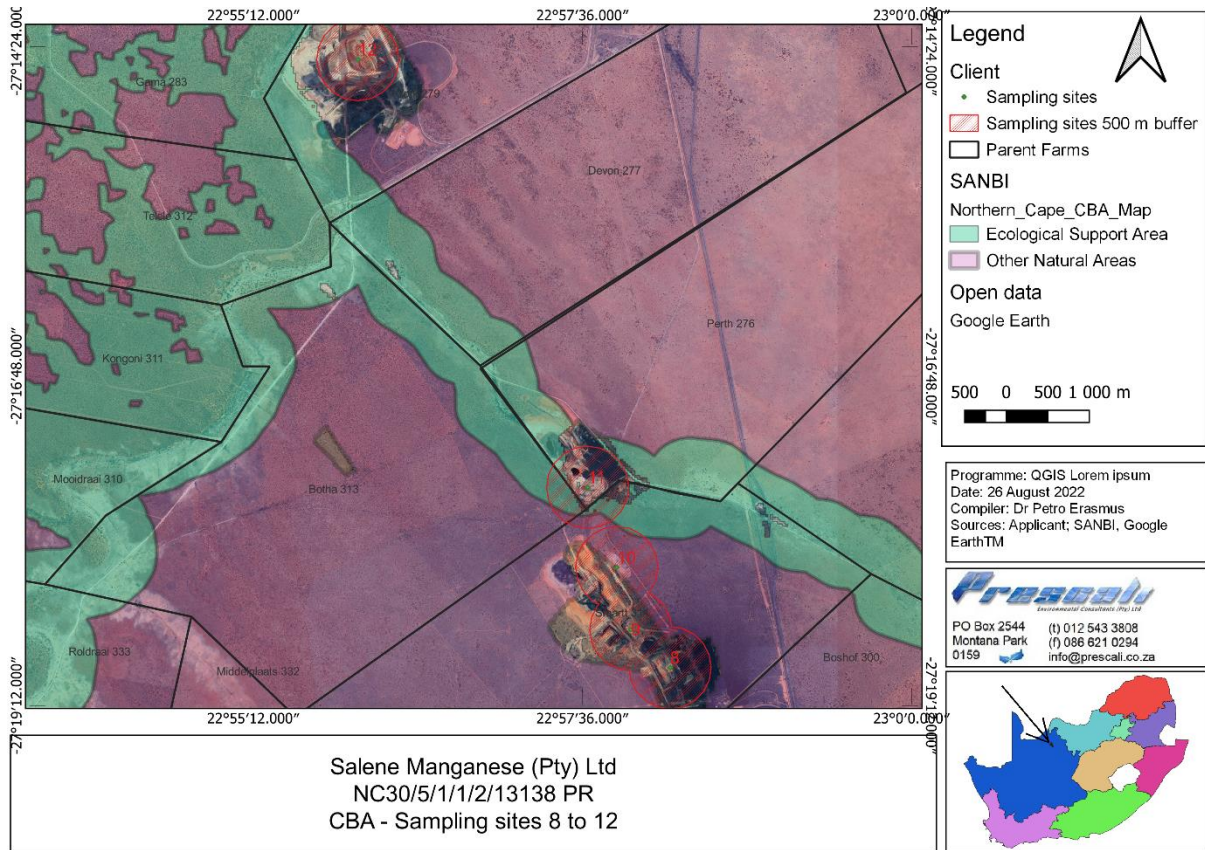


Figure 10-11: CBA at proposed sampling sites and 500 m radius boundary – Sites 8 to 12

From the latest information available from EGIS³⁶ the prospecting application area does not intersect with a declared protected or conservation area (Figure 10-12).

The Critical Biodiversity Areas (CBA) and Protected areas are important for the persistence of a viable representative sample of all ecosystem types and species as well as the long-term ecological functioning of the landscape as a whole.

³⁶ https://egis.environment.gov.za/data_egis/data_download/current 26/08/2022

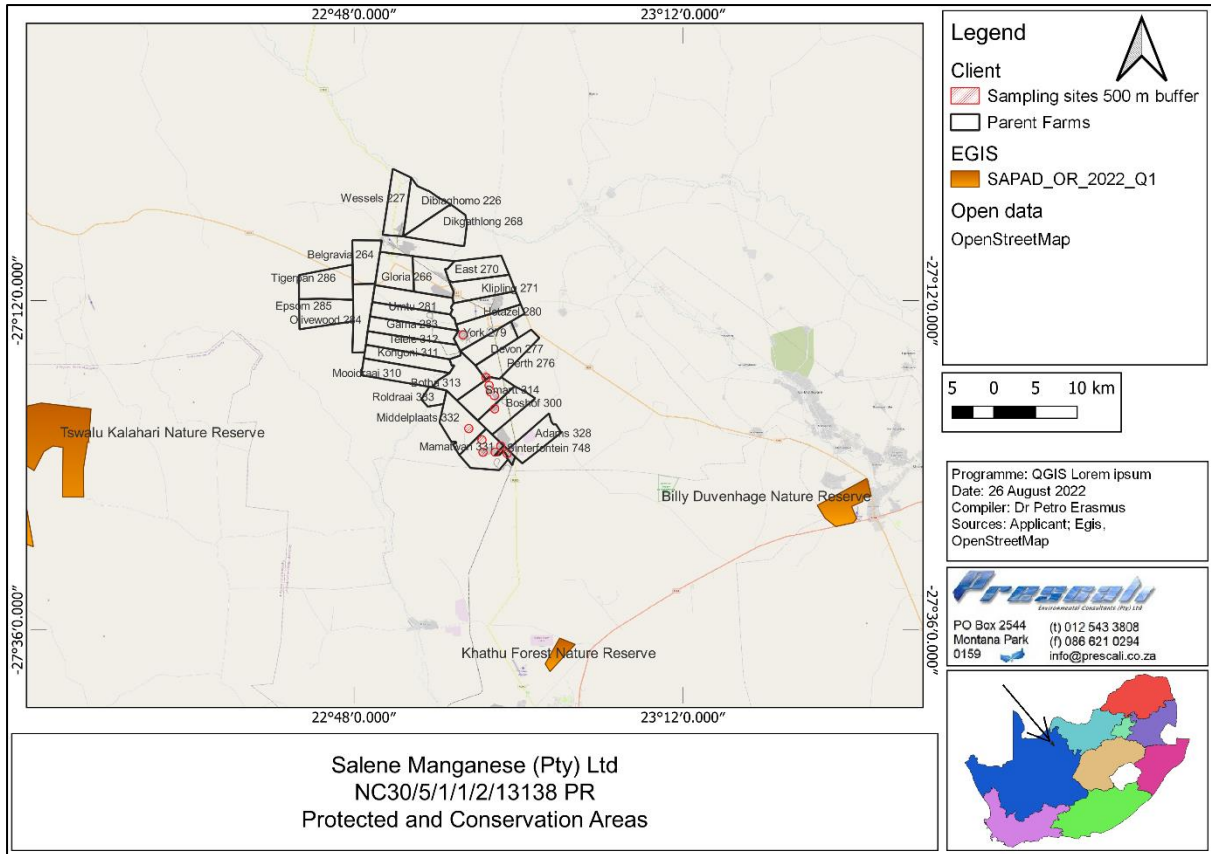


Figure 10-12: Protected and Conservational areas

10.7.1. Flora

Based on the classification (Mucina & Rutherford, 2006) the prospecting area is located within the Savannah Biome and from the National Vegetation Map (2018) (Figure 10-13) the applicable units are:

- Gordonia Duneveld;
- Kathu Bushveld; and
- Southern Kalahari Mekgacha.

As the prospecting activities will be located within disturbed areas (Residue deposits / stockpiles and mining) no vegetation is expected to be present at the locations where samples will be collected.

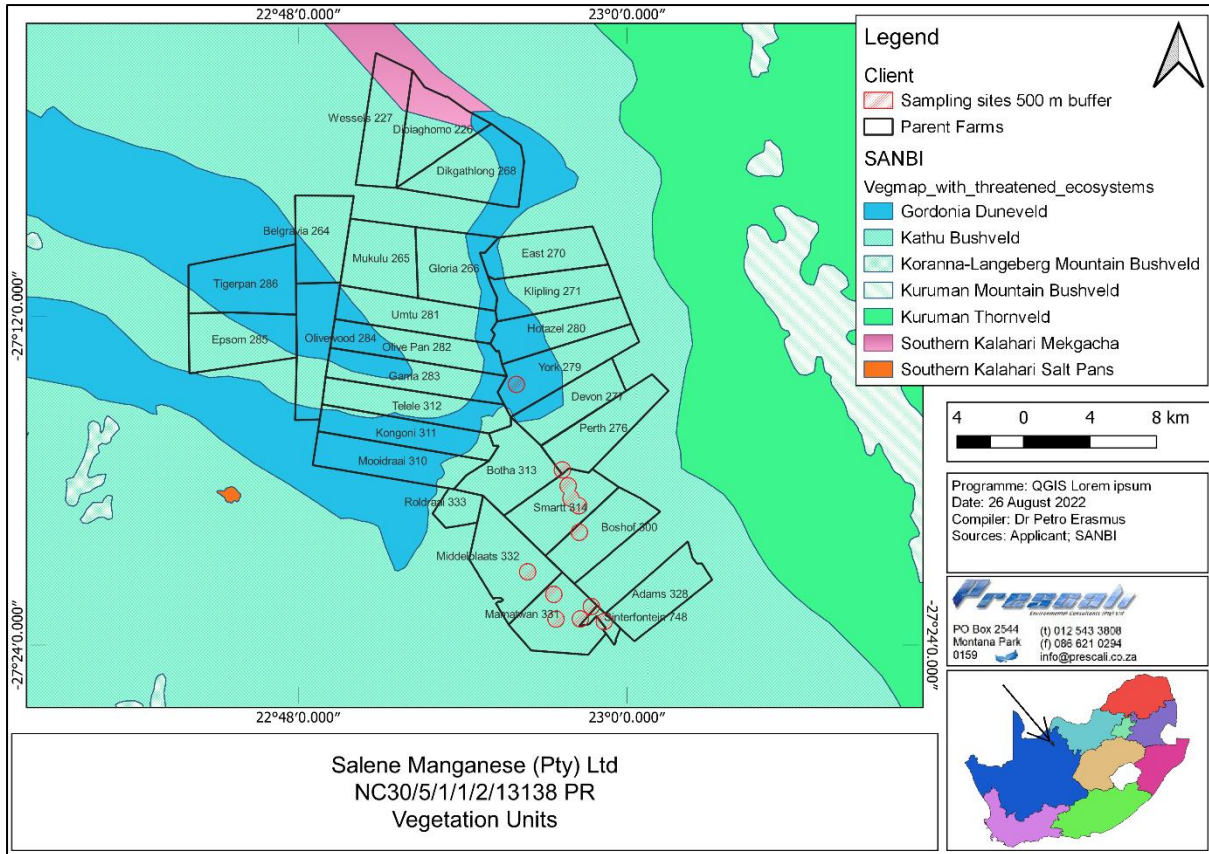


Figure 10-13: National Vegetation Map

A search on the SANBI POSA ³⁷ website for the area as indicated in Figure 10-14, indicated that the plant species as indicated in Appendix 5 could occur within the prospecting right application- and suourong area. From the list in Appendix 5 the Near Endangered species (IUSC) were extracted and are indicated in Table 10-4.

Table 10-4: Near Endangered Plant Species occurring within / near the prospecting application area

Family	Species	Diagnostic	Ecology
Amaranthaceae	<i>Hermbstaedtia odorata</i>	herb;	Indigenous
Asparagaceae	<i>Asparagus exuvialis</i>	shrub;	Indigenous
Cyperaceae	<i>Cyperus longus</i>	cyperoid; helophyte; herb;	Indigenous
Fabaceae	<i>Prosopis velutina</i>	shrub; tree;	Not indigenous; Naturalised; Invasive
Fabaceae	<i>Indigofera daleoides</i>	herb;	Indigenous
Fabaceae	<i>Tephrosia purpurea</i>	herb;	Indigenous
Fabaceae	<i>Prosopis glandulosa</i>	shrub; tree;	Not indigenous; Naturalised
Fabaceae	<i>Rhynchosia confusa</i>	climber; herb;	Indigenous
Limeaceae	<i>Limeum viscosum</i>	herb;	Indigenous
Limeaceae	<i>Limeum aethiopicum</i>		Indigenous; Endemic
Pedaliaceae	<i>Harpagophytum procumbens</i>	herb;	Indigenous
Poaceae	<i>Eragrostis mexicana</i>	graminoid;	Not indigenous; Naturalised
Poaceae	<i>Digitaria sanguinalis</i>	graminoid;	Not indigenous; Naturalised
Poaceae	<i>Lamarckia aurea</i>	graminoid;	Not indigenous; Naturalised; Invasive
Poaceae	<i>Eragrostis barrelieri</i>	graminoid;	Not indigenous; Naturalised

³⁷ <http://posa.sanbi.org/sanbi/Explore> 29 August 2022

Family	Species	Diagnostic	Ecology
Poaceae	<i>Cymbopogon pospischilii</i>	graminoid;	Indigenous
Vahliaceae	<i>Vahlia capensis</i>	herb;	Indigenous

As the prospecting activities will be located within disturbed areas (Residue deposits / stockpiles and mining) limited vegetation is expected to be present at the locations where samples will be collected.

With regards to Protected tree species as per GN 1935 of 25 March 2022 and from comments received from the Department of Forestry, Fisheries and the Environment (DFFE) the following protected species are known to occur in the prospecting application area:

- *Vachellia erioloba* (Camel Thorn),
- *Vachellia haematoxylon* (Grey cmel thorn, giraffe thorn) and
- *Boscia albitrunca* (Shepards Tree).

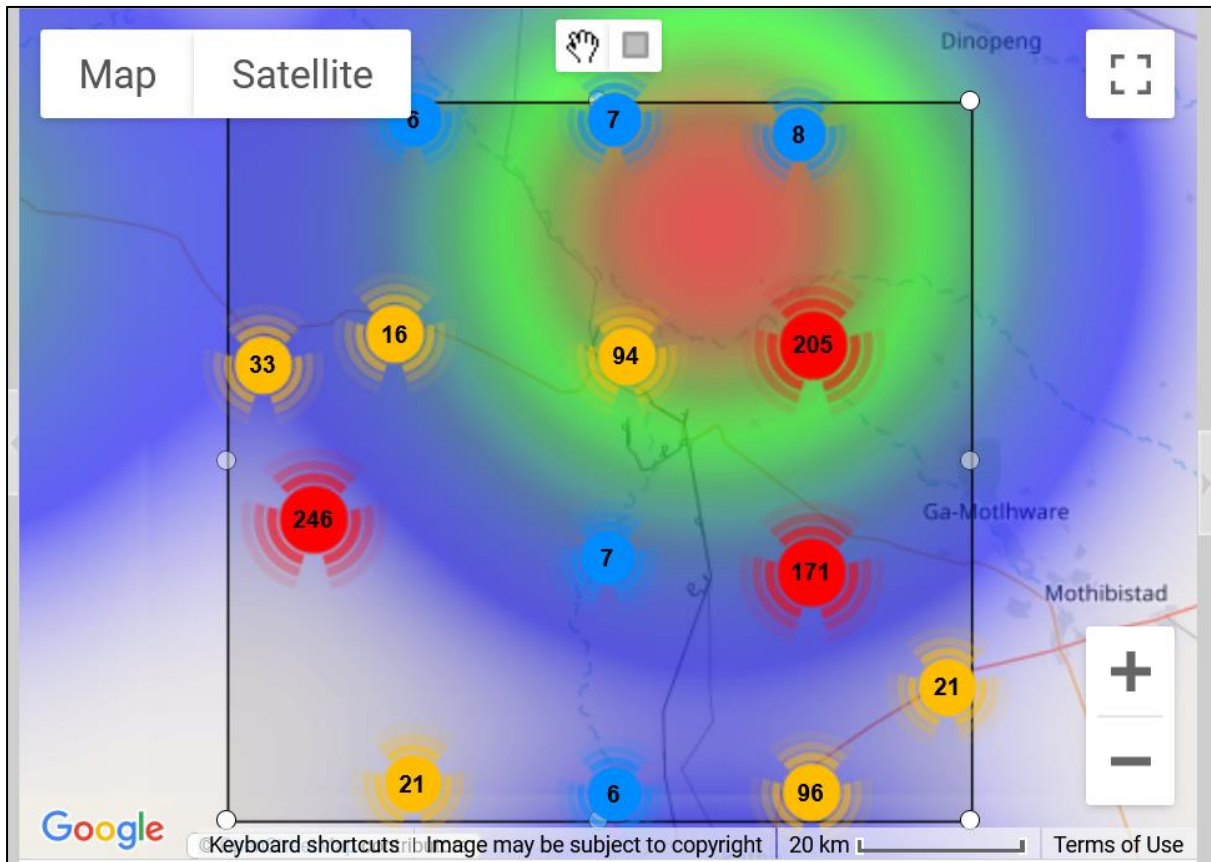


Figure 10-14: SANBI POSA search area.

10.7.2. Fauna

A desktop assessment (30 August 2022) on the Virtual Museum database indicated that the following animals may occur within the quaternary degree squares: 2722BB; 2722BD; 2723AA and 2723AC.

Table 10-5: List of animal species that could occur on site

	Family	Scientific name	Common name	Red category	list
Spiders	Theraphosidae	<i>Harpactirella sp.</i>			
Spiders	Theraphosidae	<i>Idiothele nigrofulva</i>			
Spiders	Theraphosidae	<i>Harpactira baviana</i>			
Lepidoptera	Hesperiidae	<i>Leucochitonea levubu</i>	White-cloaked skipper	Least Concern (SABCA 2013)	
Lepidoptera	Hesperiidae	<i>Pelopidas mathias</i>	Black-branded swift	Least Concern (SABCA 2013)	



	Family	Scientific name	Common name	Red list category
Lepidoptera	Hesperiidae	<i>Spialia ferax</i>	Striped sandman	Least Concern (SABCA 2013)
Lepidoptera	Hesperiidae	<i>Spialia mafa</i>	Mafa sandman	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides damarensis</i>	Damara russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides gowani</i>	Karoo russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides simplex</i>	Dune russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Azanus jesous</i>	Topaz babul blue	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Cigaritis natalensis</i>	Natal silverline	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Cigaritis phanes</i>	Silvery silverline	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Crudaria leroma</i>	Silver-spotted grey	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Leptotes pirthous</i>	Common zebra blue	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Tarucus sybaris linearis</i>	Dotted pierrot	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Acraea neobule</i>	Wandering donkey acraea	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Danaus chrysippus orientis</i>	African plain tiger	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Vanessa cardui</i>	Painted lady	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Belenois aurota</i>	Pioneer caper white	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Catopsilia florella</i>	African migrant	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Eurema brigitta</i>	Broad-bordered grass yellow	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Teracolus agoye bowkeri</i>	Speckled sulphur tip	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Teracolus eris</i>	Banded gold tip	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Teracolus subfasciatus</i>	Lemon traveller	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Belenois aurota</i>	Pioneer caper white	Least Concern (SABCA 2013)
Lepidoptera	Hesperiidae	<i>Spialia delagoae</i>	Delagoa sandman	Least Concern (SABCA 2013)
Lepidoptera	Hesperiidae	<i>Spialia ferax</i>	Striped sandman	Least Concern (SABCA 2013)
Lepidoptera	Hesperiidae	<i>Spialia mafa</i>	Mafa sandman	Least Concern (SABCA 2013)
Lepidoptera	Hesperiidae	<i>Spialia spio</i>	Mountain sandman	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides damarensis</i>	Damara russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides molomo krooni</i>	Mottled russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Aloeides simplex</i>	Dune russet	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Argyraspedes argyraspis</i>	Warrior silver-spotted copper	Least Concern (SABCA 2013)



	Family	Scientific name	Common name	Red list category
Lepidoptera	Lycaenidae	<i>Cigaritis natalensis</i>	Natal silverline	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Cigaritis phanes</i>	Silvery silverline	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Cupidopsis jobates</i>	Tailed meadow blue	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Stugeta subinfuscata reynoldsi</i>	Dusky marbled sapphire	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Tarucus sybaris linearis</i>	Dotted pierrot	Least Concern (SABCA 2013)
Lepidoptera	Lycaenidae	<i>Tylopaedia sardonys</i>	King copper	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Acraea neobule</i>	Wandering donkey acraea	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Danaus chrysippus orientis</i>	African plain tiger	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Hypolimnas misippus</i>	Common diadem	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Junonia oenone</i>	Dark blue pansy	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Vanessa cardui</i>	Painted lady	Least Concern (SABCA 2013)
Lepidoptera	Nymphalidae	<i>Ypthima asterope hereroica</i>	African three-ring	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Belenois aurota</i>	Pioneer caper white	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Catopsilia florella</i>	African migrant	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Pontia helice</i>	Southern meadow white	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Teracolus agoye bowkeri</i>	Speckled sulphur tip	Least Concern (SABCA 2013)
Lepidoptera	Pieridae	<i>Teracolus subfasciatus</i>	Lemon traveller	Least Concern (SABCA 2013)
Mammals	Manidae	<i>Smutsia temminckii</i>	Ground Pangolin	Vulnerable (2016)
Mammals	Mustelidae	<i>Mellivora capensis</i>	Honey Badger	Least Concern (2016)
Mammals	Leporidae	<i>Lepus capensis</i>	Cape Hare	Least Concern
Mammals	Muridae	<i>Gerbilliscus leucogaster</i>	Bushveld Gerbil	Least Concern (2016)
Mammals	Muridae	<i>Thallomys nigricauda</i>	Black-tailed Thallomys	Least Concern (2016)
Mammals	Bathyergidae	<i>Cryptomys hottentotus</i>	Southern African Mole-rat	Least Concern (2016)
Mammals	Erinaceidae	<i>Atelerix frontalis</i>	Southern African Hedgehog	Near Threatened (2016)
Mammals	Felidae	<i>Felis nigripes</i>	Black-footed Cat	Vulnerable (2016)
Mammals	Felidae	<i>Felis silvestris</i>	Wildcat	Least Concern (2016)
Mammals	Herpestidae	<i>Herpestes sanguineus</i>	Slender Mongoose	Least Concern (2016)
Mammals	Leporidae	<i>Lepus capensis</i>	Cape Hare	Least Concern
Mammals	Muridae	<i>Mastomys natalensis</i>	Natal Mastomys	Least Concern (2016)
Mammals	Muridae	<i>Mus (Nannomys) minutoides</i>	Southern African Pygmy Mouse	Least Concern



	Family	Scientific name	Common name	Red list category
Mammals	Nesomyidae	<i>Dendromus melanotis</i>	Gray African Climbing Mouse	Least Concern (2016)
Mammals	Nycteridae	<i>Nycteris thebaica</i>	Egyptian Slit-faced Bat	Least Concern (2016)
Mammals	Pedetidae	<i>Pedetes capensis</i>	South African Spring Hare	Least Concern (2016)
Mammals	Bathyergidae	<i>Fukomys damarensis</i>	Damara Mole-rat	Least Concern (2016)
Mammals	Molossidae	<i>Tadarida aegyptiaca</i>	Egyptian Free-tailed Bat	Least Concern (2016)
Mammals	Muridae	<i>Gerbilliscus brantsii</i>	Highveld Gerbil	Least Concern (2016)
Mammals	Muridae	<i>Gerbilliscus leucogaster</i>	Bushveld Gerbil	Least Concern (2016)
Mammals	Muridae	<i>Gerbilliscus paeba</i>	Paeba Hairy-footed Gerbil	Least Concern (2016)
Mammals	Muridae	<i>Thallomys nigricauda</i>	Black-tailed Thallomys	Least Concern (2016)
Mammals	Pedetidae	<i>Pedetes capensis</i>	South African Spring Hare	Least Concern (2016)
Mammals	Vespertilionidae	<i>Miniopterus natalensis</i>	Natal Long-fingered Bat	Least Concern (2016)
Mammals	Vespertilionidae	<i>Miniopterus schreibersii</i>	Schreibers's Long-fingered Bat	Near Threatened
Mammals	Vespertilionidae	<i>Neoromicia capensis</i>	Cape Serotine	Least Concern (2016)
Reptiles	Agamidae	<i>Agama aculeata</i>	Common Ground Agama	Least Concern (SARCA 2014)
Reptiles	Gekkonidae	<i>Chondrodactylus bibronii</i>	Bibron's Gecko	Least Concern (SARCA 2014)
Reptiles	Lacertidae	<i>Heliobolus lugubris</i>	Bushveld Lizard	Least Concern (SARCA 2014)
Reptiles	Lacertidae	<i>Pedioplanis lineoocellata</i>	Spotted Sand Lizard	Least Concern (SARCA 2014)
Reptiles	Lacertidae	<i>Pedioplanis namaquensis</i>	Namaqua Sand Lizard	Least Concern (SARCA 2014)
Reptiles	Pelomedusidae	<i>Pelomedusa galeata</i>	South African Marsh Terrapin	Not evaluated
Reptiles	Scincidae	<i>Trachylepis punctatissima</i>	Speckled Rock Skink	Least Concern (SARCA 2014)
Reptiles	Gekkonidae	<i>Pachydactylus capensis</i>	Cape Gecko	Least Concern (SARCA 2014)
Reptiles	Agamidae	<i>Agama aculeata</i>	Common Ground Agama	Least Concern (SARCA 2014)
Reptiles	Varanidae	<i>Varanus albigularis</i>	Rock Monitor	Least Concern (SARCA 2014)

Bird species that have been recorded on POSA (Desktop search 29 August 2022) are indicated in Appendix 6.

For the following no data has been reported on the Virtual Museum database, however it is highly likely that species will be present:

- Frogs;
- Odonata; and
- Scorpion.

10.8. Surface Water

10.8.1. Affected River basin

The prospecting area is located within the Lower Vaal Water Management Area (WMA), specifically the Molopo Sub-WMA (DWAf, 2004). This WMA border on Botswana in the north and is semi-arid to arid (Section 10.2) resulting in endorheic rivers that typically cease to flow after some distance due to infiltration into the river bed and evaporation.

Minerals mined in this area are iron, manganese and diamonds, while farming ranges from extensive livestock production and rainfed cultivation and intensive irrigation enterprises (DWAf, 2004).

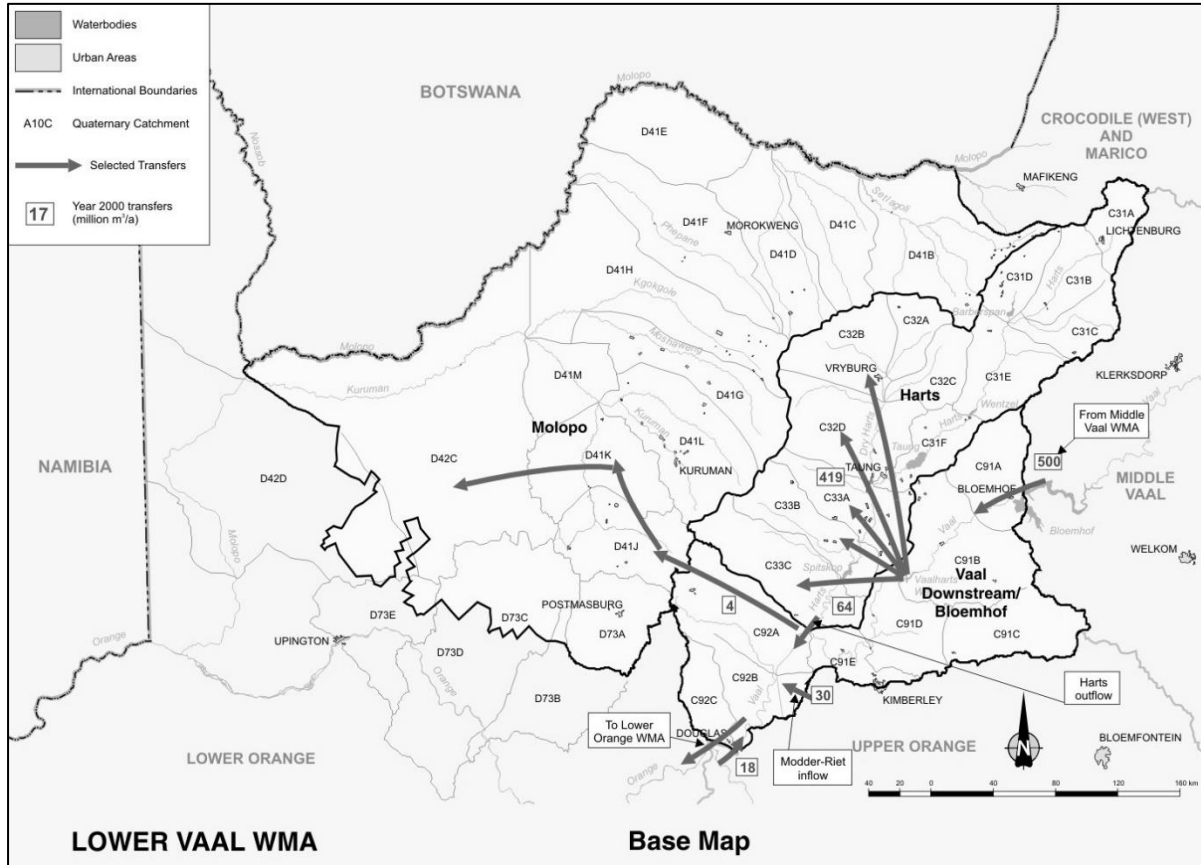


Figure 10-15: Lower Vaal Water Management Area (DWAf, 2004)

10.8.2. Quaternary catchment

The project area is located within quaternary catchment D41K, D41L and D41M. D41K is traversed by the Ga-Mogara River until it confluence with the Kuruman River, D41L and D41M is traversed by the Kuruman River, which eventually drains southwards along the Molopo River and joins the Orange River at Augrabies Falls.

Table 10-6: Quaternary catchment information (WR212)

Catchment	Area (km ²)	MAE (mm)	MAP (mm)	MAR (mcm)
D41	Gross: 53 367 Net: 31 717	2234	355	59,24
D41K	Gross: 4 216 Net: 2 664	2351	344	6,53
D41L	Gross: 5 383 Net: 2 437	2250	391	10,78
D41M	Gross: 2 628 Net: 2 157	2399	305	2,05
D41K Prospecting area	467,4982			0,724
D41L Prospecting area	5,4941			0,011
D41M Prospecting area	84,5012			0,066
Total Prospecting area	557,4935			0,801

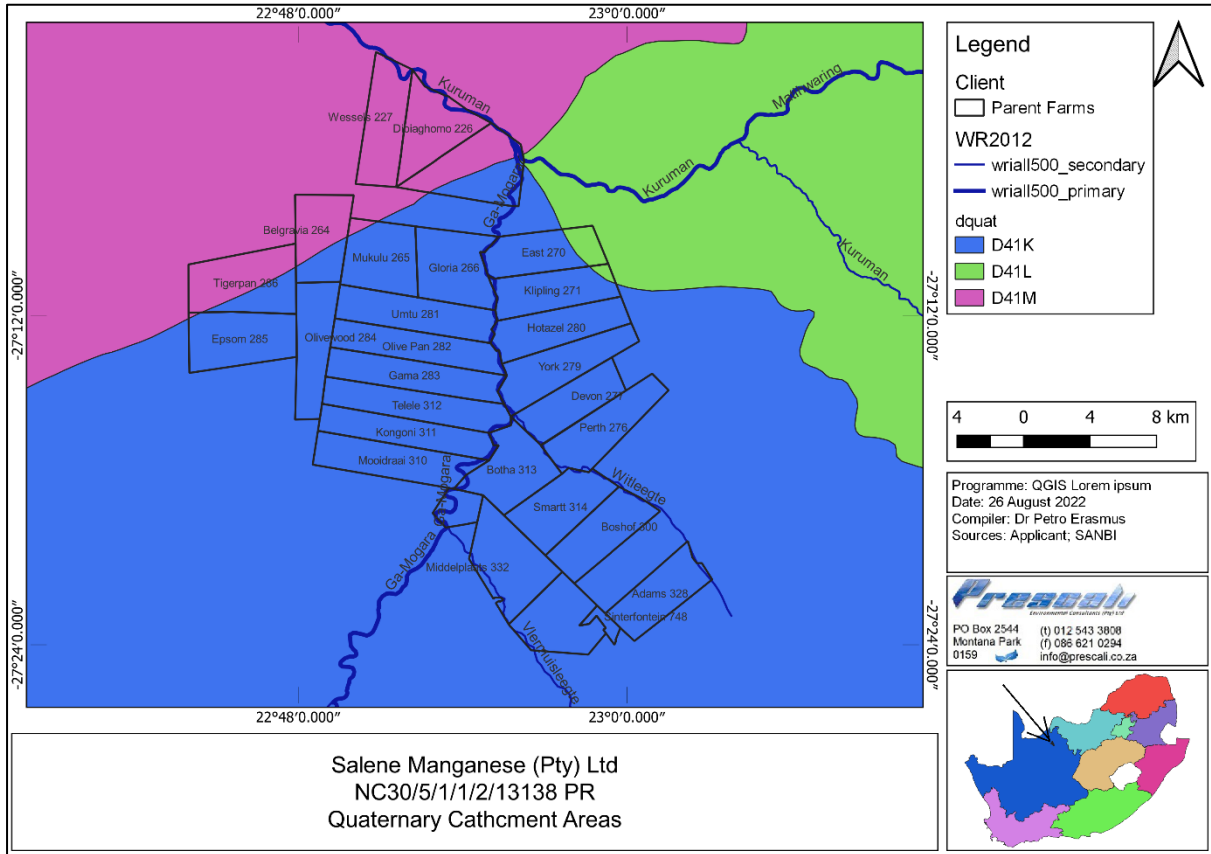


Figure 10-16: Quaternary Drainage area and watercourses

10.8.3. Site specific water resources

The Ga-Mogara River flows through the biggest part of the prospecting application area and two of its tributaries Witleegte and Vlermuisleegte intersects the prospecting application area as well (Figure 10-16). The Kuruman River form the most northern boundary of the prospecting application area.

Figure 10-17 shows the 12 sites 500 m radius sampling area relative to the surface water and it shows that with the exception of sampling sites 11 and 12, the 500 m radius in which samples will be collected are located outside of the regulated sites for watercourses and wetlands (IN = Inland natural). From Table 10-3 it is confirmed that these two sites can be considered “Not natural” due to the existing mining activities taking place as confirmed using Google Earth™.

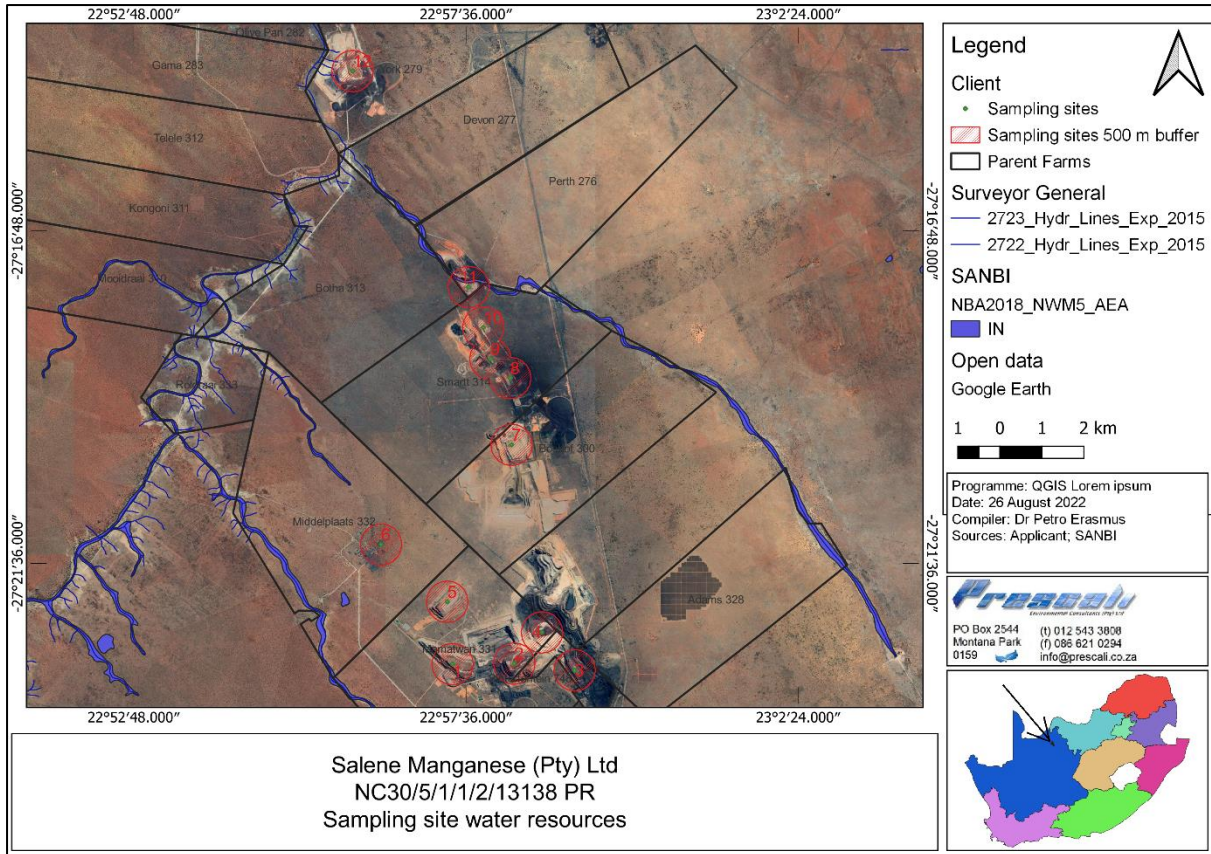


Figure 10-17: Sampling Areas location in relation to surface water resources

10.8.4. Wetland areas

Figure 10-18 shows other wetlands (Inland natural) within and around the prospecting application area. Most of the wetlands are associated with the rivers traversing the area though three depression wetland have been identified:

Number	Farm	Bioregion	Type	Wetland Condition Class
1	East 270	Eastern Kalahari Bushveld	Depression	A/B
2	Olivewood 284 and Olive pan 282	Kalahari Duneveld	Depression	D/E/F
3	Middelplaats 332	Eastern Kalahari Bushveld	Depression	D/E/F

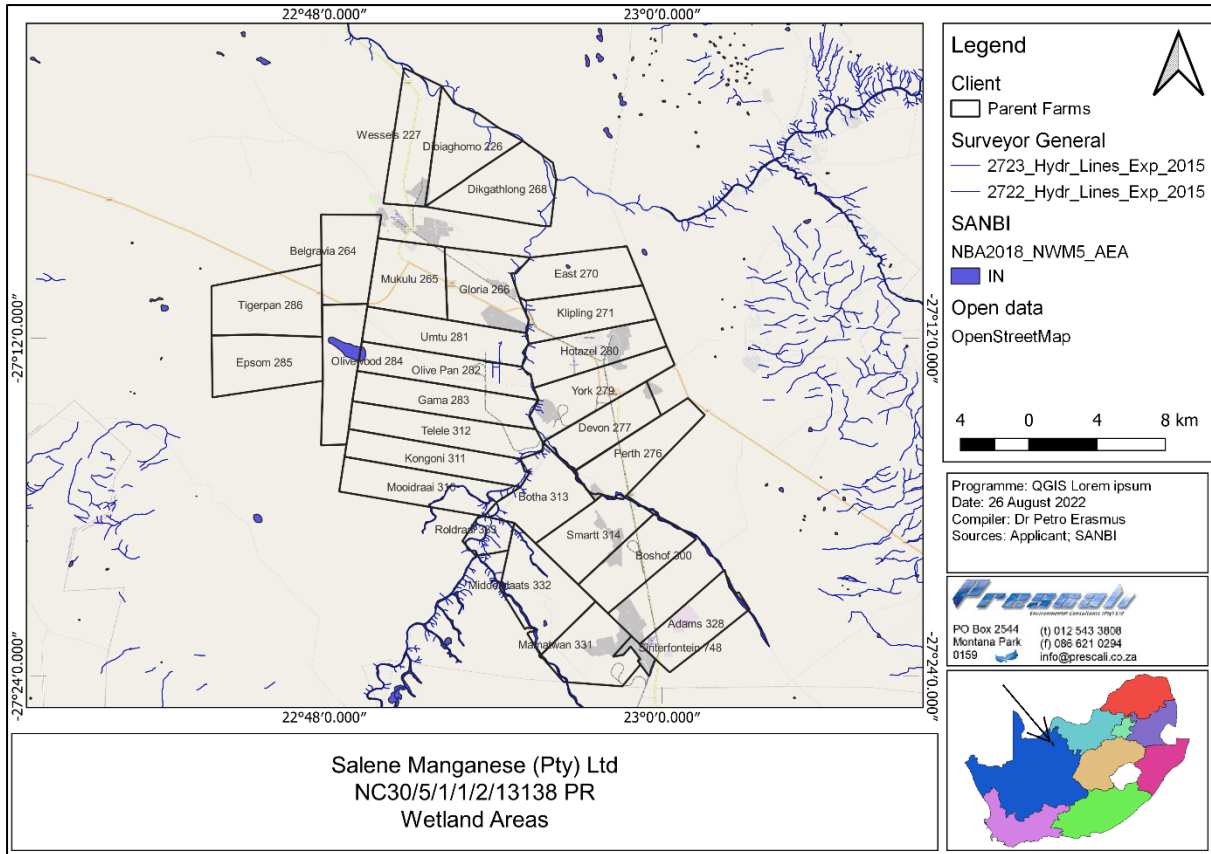


Figure 10-18: Wetlands within the prospecting application area

10.9. Groundwater

From WR2012 the Lithology description is described as “porous unconsolidated to semi-consolidated Kalahari sediment, acid, intermediate or alkaline intrusives & dolomite, chert and subordinate limestone”. Figure 10-20 shows the groundwater aquifer type and yields. Figure 10-21 shows average groundwater levels of the prospecting application area. The entire proposed prospecting area has an average groundwater level of 54,23 mbgl. Transmissivity across the prospecting application area range between 25 to 250 m²/day. The 100 m²/day follows along the Ga-Mogara River.

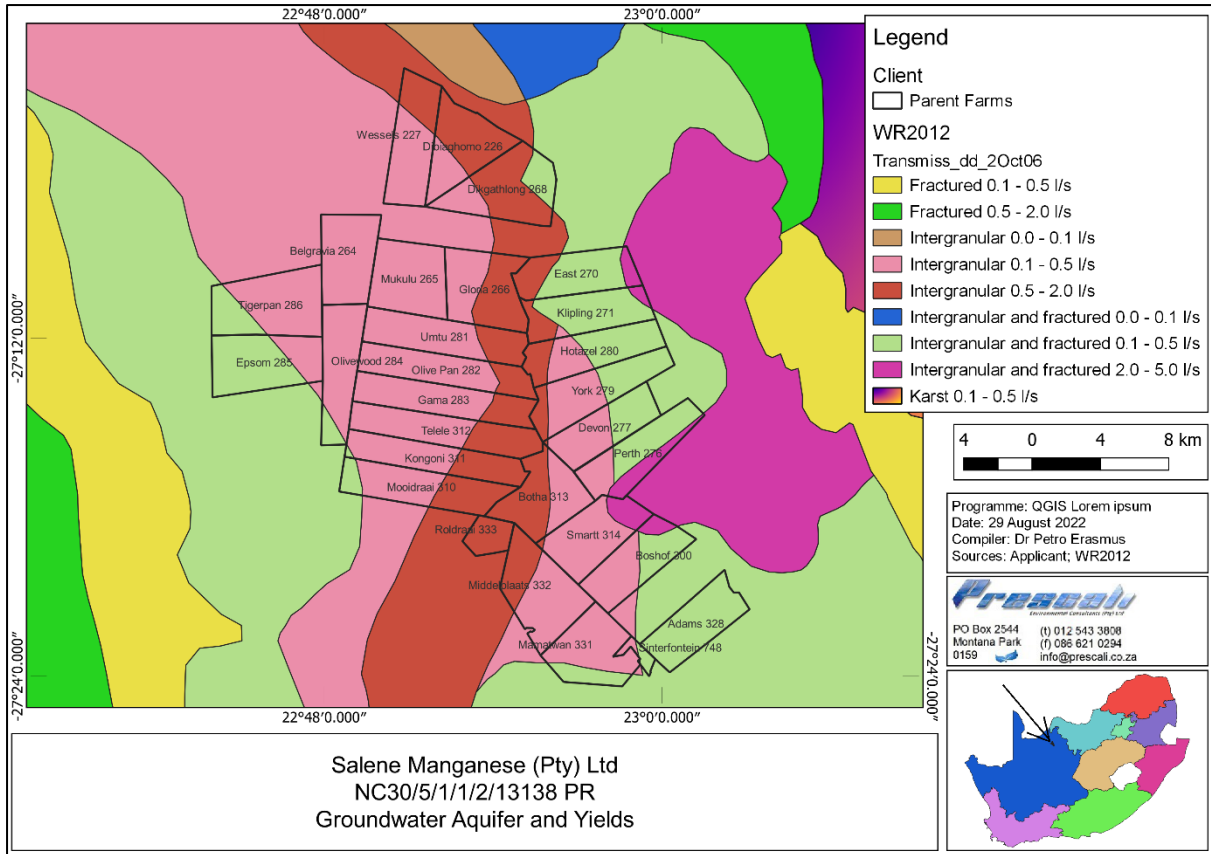


Figure 10-19: Aquifer types and yields

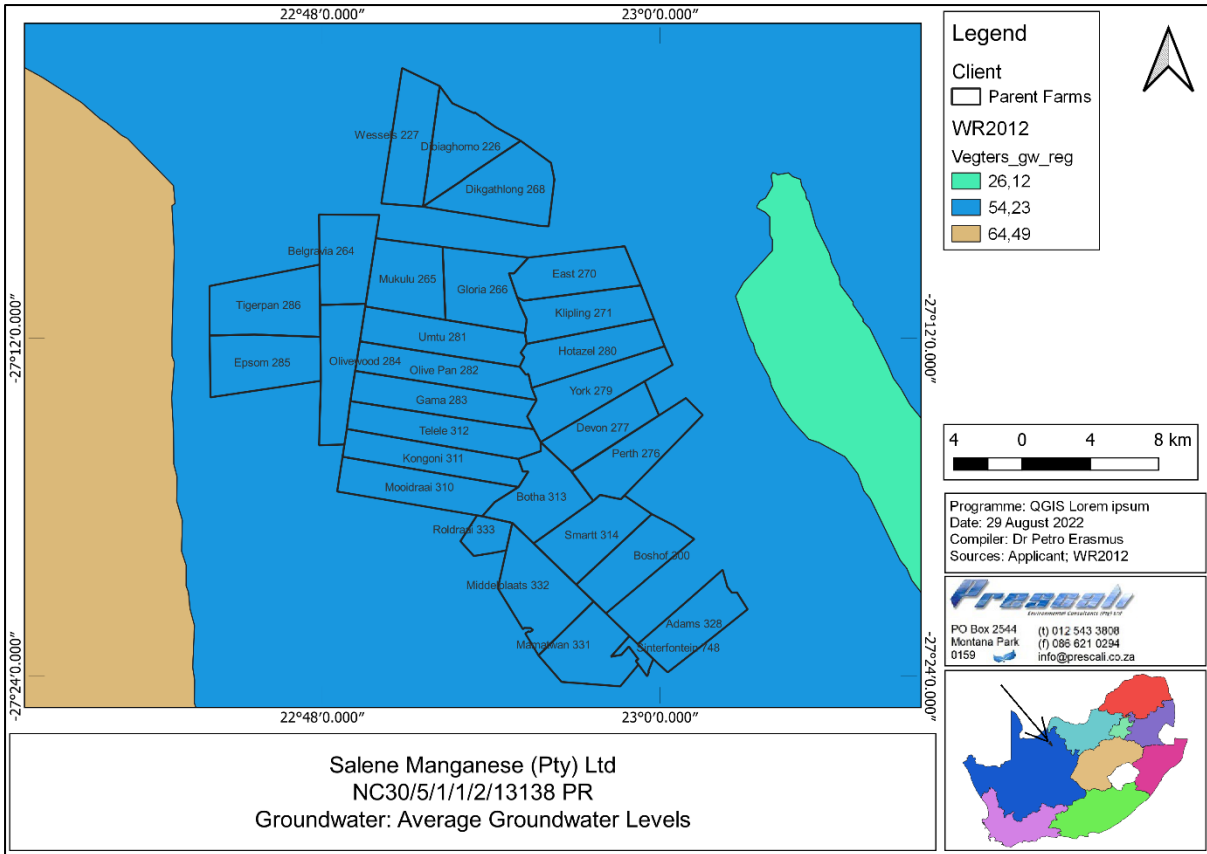


Figure 10-20: Average groundwater Levels

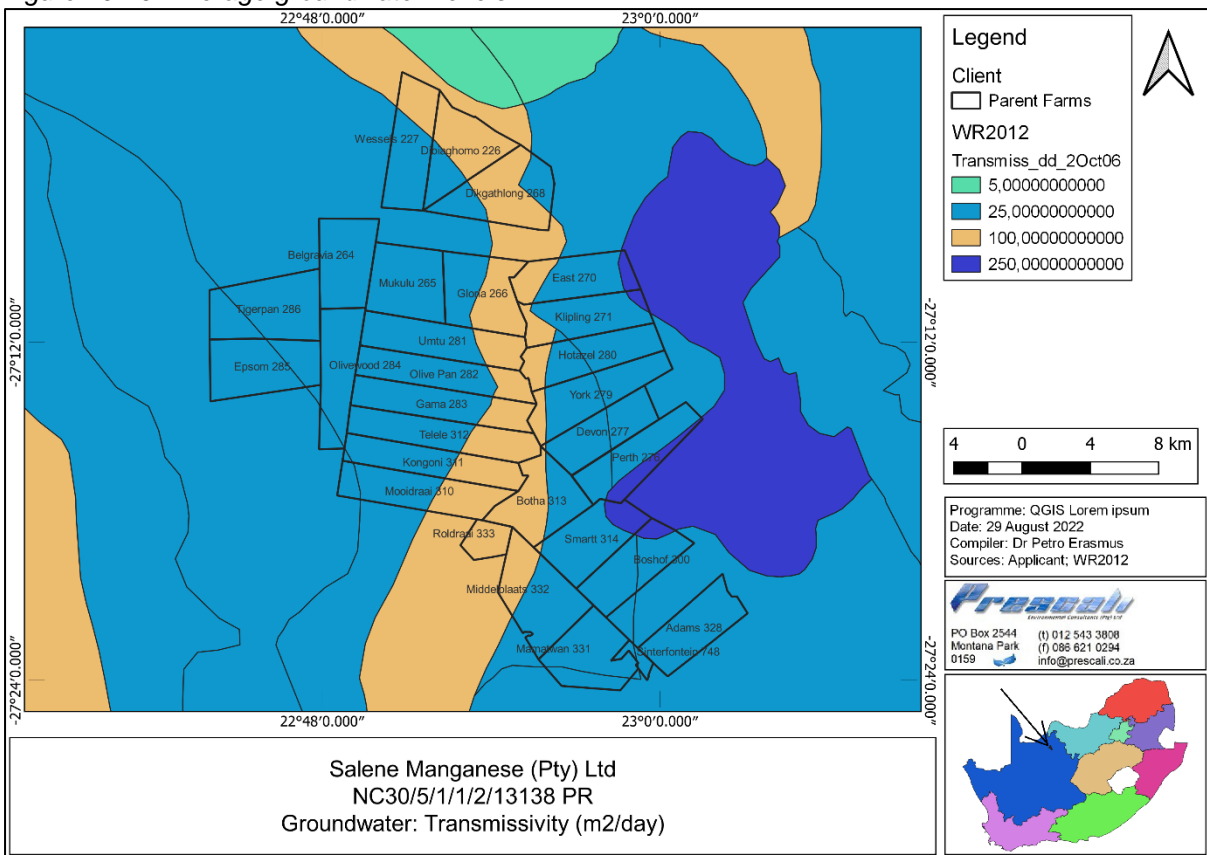


Figure 10-21: Groundwater Transmissivity

10.10. Air Quality



There are several mining operations in and around the prospecting application area which presently contribute to the existing levels of atmospheric pollution. Given the arid nature of the area in combination with existing mining operations, current levels of particulate matter (PM) in the atmosphere are expected to be elevated. Existing land uses such as mining and agriculture contribute to baseline pollutant concentrations via the following sources:

- Mining sources: Particulates represent the main pollutant of concern at mining operations. The amount of dust emitted by these activities depends on the physical characteristics of the material, the way in which the material is handled and the weather conditions.
- Unpaved and paved roads: Emissions from unpaved roads constitute a major source of emissions to the atmosphere in the South African context. Dust emissions from unpaved roads vary in relation to the vehicle traffic and the silt loading on the roads. Emission from paved roads is significantly less than those originating from unpaved roads, however they do contribute to the particulate load of the atmosphere. Particulate emissions occur whenever vehicles travel over a paved surface. The fugitive dust emissions are due to the re-suspension of loose material on the road surface.
- Wind erosion and open areas: Windblown dust generates from natural and anthropogenic sources. Erodible surfaces may occur as a result of agriculture and/or grazing activities.
- Vehicle tailpipe emissions: Emissions resulting from motor vehicles can be grouped into primary and secondary pollutants. While primary pollutants are emitted directly into the atmosphere, secondary pollutants form in the atmosphere as a result of chemical reactions. Significant primary pollutants emitted combustion engines 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).

10.11. Heritage and Cultural Resources

The proposed activities will (as far as possible) take place within existing mining / residue deposit and stockpile areas at the 12 locations as identified (Figure 4-1) thus it is unlikely that areas of heritage and palaeontological significance will be affected by the sampling activities.

Located south of the prospecting application area, the Gamagara Municipality area owns an endemic camel-thorn tree forest, which enjoys a National Heritage status. The tree gave Kathu its name; the “town under the trees”. The Kathu forest situated north of the town of Kathu has been declared a protected woodland in terms of section 12(1) (c) of the National Forests Act (1998) by the Minister of Agriculture, Forestry and Fisheries. This was confirmed in the Government gazette dated 10 July 2009. The Kathu Forest is a unique woodland of exceptionally large camel thorn trees (*Vachellia erioloba*). The woodland of approximately 4000 hectares is one of only two such woodlands in the world. The Kathu forest was registered as a national heritage site in 1995. The farms and portions that make up the forest are currently privately owned.

10.12. Socio Economy Situation

Information in this section was sourced from the Joe Morolong LM Integrated Development Plant (IDP) 2021-2022.

The Joe Morolong LM (previously the Moshaweng LM) is a category B municipality that covers approximately 20 215 km² with one semi-urban area, villages (183) and commercial farms. There are Tribal authorities with eight (8) Paramount chiefs.

Based on the 2016 Census information, the LM population is 84 000 consisting of 55% females and 45% males. This LM shows a negative population growth as a result of migrations to Ga-Segonyana and Gamagara. 97% of the population is Black African, followed by White (2%) and coloured (1%). The most spoken language is Setswane (92%), followed by Afrikaans (3%) and other (3%).

With regards to services, there are 168 schools, 4 police stations, 24 clinics and 3 community health centres.

The priority economic sectors are Agriculture, mining and community services and the following mining houses: UMK, South 32, Assmang Blackrock, Tshipi-e-Ntle, Kalagadi, Kudumane Mining Resources, Baga Phadima Sand Mining, Sebilo, Mokala Manganese, East Manganese, Khwara and Lehating. The number of employment (jobs) created per sector are:



Sector	Number of jobs created
Agriculture related work	720
Manufacturing	144
Mining, Quarrying	471
Electricity, gas, water	116
Construction	283
Wholesale, Retail	432
Transport	122
Business services	100
Community services	1 693
Undetermined	87 171

Employment statistics indicate that 89 530 people are economical active:

Employed	Unemployed	Discouraged work seeker	Other not economically active	Not applicable
7 828	4 912	6 200	29 569	41 022

Education levels in the LM are:

Education Level	%
No schooling	15%
Some primary school	25 %
Primary	5%
Some Secondary school	33%
Grade 12	15%
Under graduate	2%

10.13. Description of the current land uses

The land use in the prospecting application area is mining, agricultural and residential. The 2020 land cover (as available from the EGIS website) is indicated in Figure 10-22.

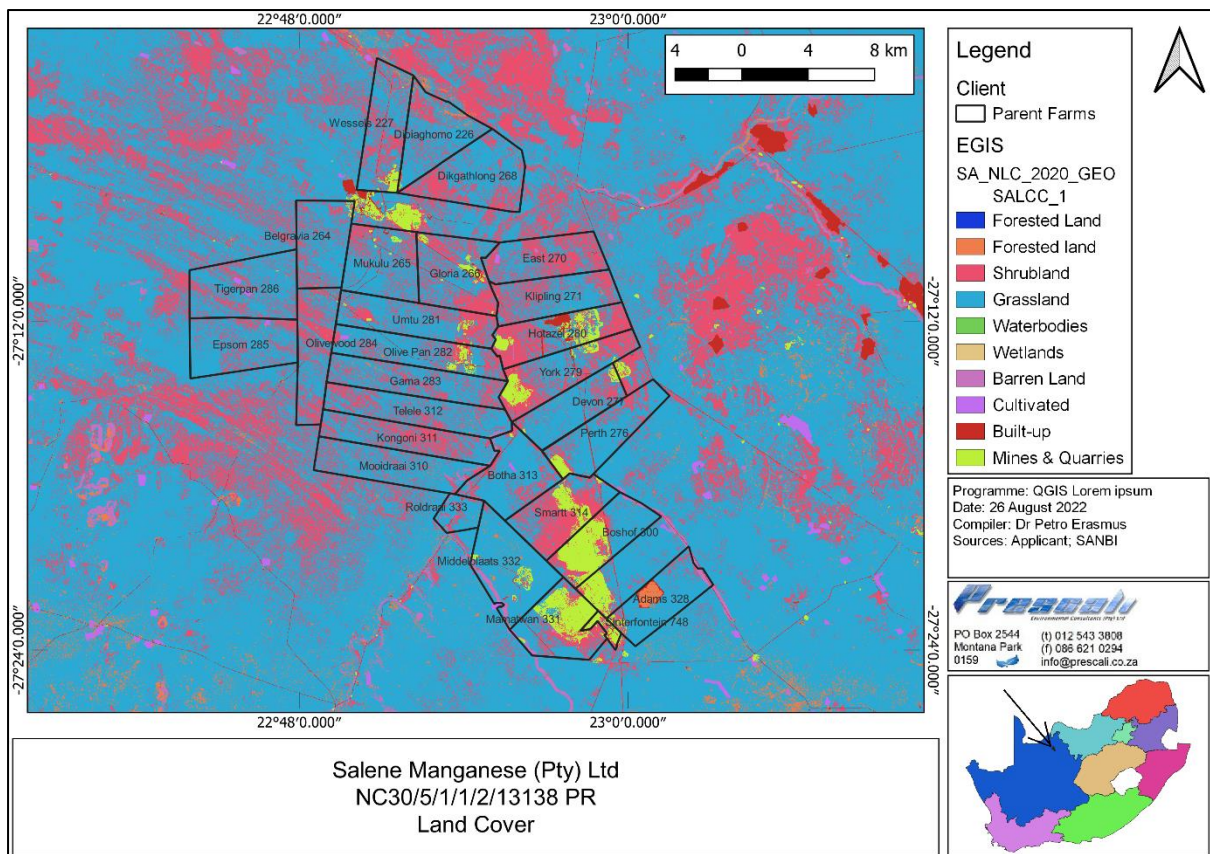


Figure 10-22: Land cover



10.14. Description of specific environmental features and infrastructure on the site

The proposed sampling activities as applicable to this report, will take place mainly in already disturbed areas such as mining residue stockpiles /deposit area, no other areas will be disturbed especially any Greenfields areas. Existing access roads will be used to access the site.

Should it be deemed viable to expand the sampling plan an amendment to the Environmental authorisation and BAR/EMPr will be needed.

10.15. Environmental and current land use map

(Show all environmental, and current land use features)

Please refer to Figure 10-22.

11.POSITIVE AND NEGATIVE IMPACTS IDENTIFIED THAT THE PROPOSED ACTIVITY AND ALTERNATIVES WILL HAVE ON THE ENVIRONMENT AND THE COMMUNITY THAT MAY BE AFFECTED

The proposed prospecting activities to be undertaken include the use of both invasive and non-invasive prospecting techniques. There will therefore be physical disturbance to selected areas within the application area although this disturbance will be limited to the identified sampling sites and not the entire application area. Samples will be taken from existing residue deposits / stockpile areas. Approximately 10 samples to be collected within a radius of approximately 500 m from each of the 12 sample points that have been identified. Each surface sample will not disturb more than 1 m². Initial sampling collection will be done using picks and shovels.

The positive impact of the proposed activity is the discovery of economically viable mineral resources within the Joe Morolong Local Municipalities.

It should be noted that this report made available to I&AP's for review and comment and their comments and concerns will be taken into account in this BAR. Furthermore, it should be noted that the impact scores themselves will include the results of the public response and comment. Please refer to Section 11.1 for the Methodology used in determining and ranking the nature, significance, consequence, extent, duration and probability of potential environmental impacts and risks.

The access roads may over time and continuous use deteriorate and become damaged. The potential exists for a group of unfamiliar workers to enter the project area during the prospecting activities. This impact could potentially affect the local communities; however, the impact will be minimal as people on site will be limited to the Applicant, contractor and geologists for the topographical and geophysical surveys.

The removal of natural vegetation to accommodate the sampling of may reduce the habitat available for fauna species and may reduce animal populations and species compositions within the area, at least temporarily. Access to the application area for the topographical, geophysical survey and sampling will be required which may interrupt the existing land uses, i.e., mining. However, this impact will be minimal as it is of short duration. Provisions have been made for the rehabilitation of all areas disturbed during prospecting.

It is unlikely that the prospecting activities will generate general waste during the operational phase. Any waste that is generated must be collected during site visits to be disposed of at appropriate landfill sites.

A summary of the positive and negative impacts of the proposed activity are provided in below.

Table 11-1: Identified Positive and Negative Impacts

Aspect	Activity	Impact	Phase	Positive / Negative
All	Planning of prospecting activities	No impacts are foreseen due to the non-invasive nature of the planning phase	All	N/A
All	Consultation of affected parties	N/A	All	N/A



Aspect	Activity	Impact	Phase	Positive / Negative
All	Potential construction of roads and infrastructure	None foreseen as existing access roads will be used to access the proposed sampling areas	Co	N/A
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Temporary disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Loss of CBA1 and ESA and other sections of area classed as other natural Areas	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement of Faunal community due to temporary habitat loss, disturbance (noise, dust, and vibration) and/or direct mortalities	O	Negative
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Continued disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Encroachment by alien invasive plant species	O, CI	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Negative



Aspect	Activity	Impact	Phase	Positive / Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Further impacts due to the spread and/or establishment of alien and/or invasive species	O	Negative
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Further impacts due to the spread and/or establishment of alien and/or invasive species	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbances such as dust, vibrations poaching and noise.	O	Negative
Groundwater	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Degradation of aquifers	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts of existing groundwater users	O	Negative
Heritage Resources	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on potential burial grounds and graves	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on archaeological resources	O	Negative
Noise	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Noise nuisance	O	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Pollution of soil	O	Negative
Air	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Air Quality	O	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Deterioration and damage to existing access roads and tracks	O, D	Negative
Socio-economic	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential job creation	O, D	Positive
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Safety and security to existing landowners and lawful occupier	O, D	Negative
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Interference with existing land uses	O, D	Negative



Aspect	Activity	Impact	Phase	Positive / Negative
Waste	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Generation and disposal of waste	O, D	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Erosion due to improper rehabilitation	D	Negative
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential soil pollution from hydrocarbons spills from vehicles used to access the site	O	Negative
Land Use	Site access to the proposed sampling site	Potential impact on the disposal of waste on the sampling area by the operational mining company	O	Negative
Land Use	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential impact on the disposal of waste on the sampling area by the operational mining company	O	Negative
Service provision: Electricity	Site access to the proposed sampling site	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	O	Negative
Service provision: Electricity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	O	Negative
All	Rehabilitation of disturbed sites	Rehabilitation of sampling area to predetermined land use	Re	Positive

11.1. Methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks

(Describe how the significance, probability, and duration of the aforesaid identified impacts that were identified through the consultation process was determined in order to decide the extent to which the initial site layout needs revision).

11.1.1. Assessment Criteria

The criteria for the description and assessment of environmental impacts were drawn from the EIA Guidelines (DEAT, 1998) and as amended from time to time (DEAT, 2002).

The level of detail as depicted in the EIA Guidelines (DEAT, 2002) was fine-tuned by assigning specific values to each impact. In order to establish a coherent framework within which all impacts could be objectively assessed, it was necessary to establish a rating system, which was applied consistently to all the criteria. For such purposes each aspect was assigned a value, ranging from one (1) to five (5), depending on its definition. This assessment is a relative evaluation within the context of all the activities and the other impacts within the framework of the project.

An explanation of the impact assessment criteria is defined below.

Table 11-2: Impact Assessment Criteria

EXTENT	
Classification of the physical and spatial scale of the impact	
Footprint	The impacted area extends only as far as the activity, such as footprint occurring within the total site area.
Site	The impact could affect the whole, or a significant portion of the site.
Regional	The impact could affect the area including the neighbouring farms, the transport routes and the adjoining towns.



National	The impact could have an effect that expands throughout the country (South Africa).
International	Where the impact has international ramifications that extend beyond the boundaries of South Africa.
DURATION	
The lifetime of the impact that is measured in relation to the lifetime of the proposed development.	
Short term	The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than that of the Site Establishment phase.
Short to Medium term	The impact will be relevant through to the end of a Site Establishment phase (1.5 years).
Medium term	The impact will last up to the end of the development phases, where after it will be entirely negated.
Long term	The impact will continue or last for the entire operational lifetime i.e. exceed 30 years of the development, but will be mitigated by direct human action or by natural processes thereafter.
Permanent	This is the only class of impact, which will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient.
INTENSITY	
The intensity of the impact is considered by examining whether the impact is destructive or benign, whether it destroys the impacted environment, alters its functioning, or slightly alters the environment itself. The intensity is rated as	
Low	The impact alters the affected environment in such a way that the natural processes or functions are not affected.
Medium	The affected environment is altered, but functions and processes continue, albeit in a modified way.
High	Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases.
PROBABILITY	
This describes the likelihood of the impacts actually occurring. The impact may occur for any length of time during the life cycle of the activity, and not at any given time. The classes are rated as follows:	
Improbable	The possibility of the impact occurring is none, due either to the circumstances, design or experience. The chance of this impact occurring is zero (0 %).
Possible	The possibility of the impact occurring is very low, due either to the circumstances, design or experience. The chances of this impact occurring is defined as 25 %.
Likely	There is a possibility that the impact will occur to the extent that provisions must therefore be made. The chances of this impact occurring is defined as 50 %.
Highly Likely	It is most likely that the impacts will occur at some stage of the development. Plans must be drawn up before carrying out the activity. The chances of this impact occurring is defined as 75 %.
Definite	The impact will take place regardless of any prevention plans, and only mitigation actions or contingency plans to contain the effect can be relied on. The chance of this impact occurring is defined as 100 %.

The status of the impacts and degree of confidence with respect to the assessment of the significance must be stated as follows:

- **Status of the impact:** A description as to whether the impact would be positive (a benefit), negative (a cost), or neutral.
- **Degree of confidence in predictions:** The degree of confidence in the predictions, based on the availability of information and specialist knowledge.

Other aspects to take into consideration in the specialist studies are:

- Impacts should be described both before and after the proposed mitigation and management measures have been implemented.
- All impacts should be evaluated for the full-lifecycle of the proposed development, including Site Establishment, operation and decommissioning.
- The impact evaluation should take into consideration the cumulative effects associated with this and other facilities which are either developed or in the process of being developed in the region.



- The specialist studies must attempt to quantify the magnitude of potential impacts (direct and cumulative effects) and outline the rationale used. Where appropriate, national standards are to be used as a measure of the level of impact.

11.1.2. Mitigation

The impacts that are generated by the development can be minimised if measures are implemented in order to reduce the impacts. The mitigation measures ensure that the development considers the environment and the predicted impacts in order to minimise impacts and achieve sustainable development.

11.1.3. Determination of Significance-Without Mitigation

Significance is determined through a synthesis of impact characteristics as described in the above paragraphs. It provides an indication of the importance of the impact in terms of both tangible and intangible characteristics. The significance of the impact “without mitigation” is the prime determinant of the nature and degree of mitigation required. Where the impact is positive, significance is noted as “positive”. Significance is rated on the following scale:

Table 11-3: Significance-Without Mitigation

NO SIGNIFICANCE	The impact is not substantial and does not require any mitigation action.
LOW	The impact is of little importance, but may require limited mitigation.
MEDIUM	The impact is of importance and is therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels.
HIGH	The impact is of major importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.

11.1.4. Determination of Significance- With Mitigation

Determination of significance refers to the foreseeable significance of the impact after the successful implementation of the necessary mitigation measures. Significance with mitigation is rated on the following scale:

Table 11-4: Significance-With Mitigation

NO SIGNIFICANCE	The impact will be mitigated to the point where it is regarded as insubstantial.
LOW	The impact will be mitigated to the point where it is of limited importance.
LOW TO MEDIUM	The impact is of importance, however, through the implementation of the correct mitigation measures such potential impacts can be reduced to acceptable levels.
MEDIUM	Notwithstanding the successful implementation of the mitigation measures, to reduce the negative impacts to acceptable levels, the negative impact will remain of significance. However, taken within the overall context of the project, the persistent impact does not constitute a fatal flaw.
MEDIUM TO HIGH	The impact is of major importance but through the implementation of the correct mitigation measures, the negative impacts will be reduced to acceptable levels.
HIGH	The impact is of major importance. Mitigation of the impact is not possible on a cost-effective basis. The impact is regarded as high importance and taken within the overall context of the project, is regarded as a fatal flaw. An impact regarded as high significance, after mitigation could render the entire development option or entire project proposal unacceptable.

11.1.5. Assessment Weighting

Each aspect within an impact description was assigned a series of quantitative criteria. Such criteria are likely to differ during the different stages of the project’s life cycle. In order to establish a defined base upon which it becomes feasible to make an informed decision, it was necessary to weigh and rank all the criteria.

11.1.6. Ranking, Weighting and Scaling

For each impact under scrutiny, a scaled weighting factor is attached to each respective impact (refer Table 11-5).

The purpose of assigning weights serves to highlight those aspects considered the most critical to the various stakeholders and ensure that each specialist's element of bias is taken into account. The weighting factor also provides a means whereby the impact assessor can successfully deal with the complexities that exist between the different impacts and associated aspect criteria.

Simply, such a weighting factor is indicative of the importance of the impact in terms of the potential effect that it could have on the surrounding environment. Therefore, the aspects considered to have a relatively high value will score a relatively higher weighting than that which is of lower importance.

Table 11-5: Description of assessment parameters with its respective weighting

EXTENT		DURATION		INTENSITY		PROBABILITY		WEIGHTING FACTOR (WF)		SIGNIFICANCE RATING (SR)	
Footprint	1	Short term	1	Low	1	Improbable	1	Low	1	Low	0-19
Site	2	Short to Medium	2			Possible	2	Low to Medium	2	Low to Medium	20-39
Regional	3	Medium term	3	Medium	3	Likely	3	Medium	3	Medium	40-59
National	4	Long term	4			Highly Likely	4	Medium to High	4	Medium to High	60-79
International	5	Permanent	5	High	5	Definite	5	High	5	High	80-100
MITIGATION EFFICIENCY (ME)						SIGNIFICANCE FOLLOWING MITIGATION (SFM)					
High			0.2			Low			0 - 19		
Medium to High			0.4			Low to Medium			20 - 39		
Medium			0.6			Medium			40 - 59		
Low to Medium			0.8			Medium to High			60 - 79		
Low			1.0			High			80 - 100		

11.1.7. Identifying the Potential Impacts Without Mitigation Measures (WOM)

Following the assignment of the necessary weights to the respective aspects, criteria are summed and multiplied by their assigned weightings, resulting in a value for each impact (prior to the implementation of mitigation measures).

Equation 1:

$$\text{Significance Rating (WOM)} = (\text{Extent} + \text{Intensity} + \text{Duration} + \text{Probability}) \times \text{Weighting Factor}$$

11.1.8. Identifying the Potential Impacts with Mitigation Measures (WM)

In order to gain a comprehensive understanding of the overall significance of the impact, after implementation of the mitigation measures, it was necessary to re-evaluate the impact.

11.1.8.1. Mitigation Efficiency (ME)

The most effective means of deriving a quantitative value of mitigated impacts is to assign each significance rating value (WOM) a mitigation efficiency (ME) rating (refer to Table 11-5).

The allocation of such a rating is a measure of the efficiency and effectiveness, as identified through professional experience and Empirical evidence of how effectively the proposed mitigation measures will manage the impact.

Thus, the lower the assigned value the greater the effectiveness of the proposed mitigation measures and subsequently, the lower the impacts with mitigation.



Equation 2:

$$\text{Significance Rating (WM)} = \text{Significance Rating (WOM)} \times \text{Mitigation Efficiency}$$

or $\text{WM} = \text{WOM} \times \text{ME}$

11.1.9. Significance Following Mitigation (SFM)

The significance of the impact after the mitigation measures are taken into consideration. The efficiency of the mitigation measure determines the significance of the impact. The level of impact is therefore seen in its entirety with all considerations taken into account

11.2. The possible mitigation measures that could be applied and the level of risk.

(With regard to the issues and concerns raised by affected parties provide a list of the issues raised and an assessment/discussion of the mitigations or site layout alternatives available to accommodate or address their concerns, together with an assessment of the impacts or risks associated with the mitigation or alternatives considered).

The mitigation measures have addressed in the Section 12 under Environmental Impact Assessment.

11.3. Motivation where no alternative sites were considered

Minerals are site specific and accordingly alternative sites were not selected for this project as the aim of the prospecting activities is to determine if the selected minerals are present in viable quantities. The locations for the proposed sampling areas (12) were based on the potential location of existing mining impacts such as residue deposits / stockpile, no other areas will be disturbed especially any greenfields areas. If prospecting does not indicate the desired mineral to be mined, alternative sites will be considered by the applicant and an amendment will be applied for. All sensitive features have been considered and will be excluded from the prospecting activities.

11.4. Statement motivating the alternative development location within the overall site

(Provide a statement motivating the final site layout that is proposed)

Since exploration is temporary in nature no permanent structures will be constructed, negotiations and agreements will be made with the applicable mining companies / farm owners / surface right users to use any existing infrastructure such as access roads, etc. In addition to the information provided, each of the phases is dependent on the results and success of the preceding phase. The location and extent of sampling will be determined based on information derived from the surveys.

As discussed above, the proposed application area has been selected due to the geology of the site and the anticipated favourable tectono-stratigraphic setting of the prospect area. There are no protected areas within the application area. The land or properties affected are existing residue deposits / stockpiles and therefore the potential discovery of additional viable minerals within the application area would be beneficial in terms of waste reduction should the minerals be present in viable quantities.

The impacts of the development alternative are low-medium to low and would reduce to low should the proposed mitigation measures be implemented accordingly.

11.5. Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site.

(In respect of the final site layout plan) through the life of the activity. (Including (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.)

In order to identify the potential impacts associated with the proposed prospecting activities the following steps were undertaken:

- The stakeholder consultation process is currently undertaken in a manner to be interactive, providing landowners and identified stakeholders with the opportunity to provide input into the project. This is a key focus, as the local residence has capabilities of providing site specific information, which may not be available in desktop research material. Stakeholders are requested to provide their views on the project and any potential concerns which they may have. All comments and concerns are captured and formulated into the impact assessment.
- A detailed desktop investigation was undertaken to determine the environmental setting in which the project is located. Based on the desktop investigations various resources were used



to determine the significance and sensitivity of the various environmental considerations. The desktop investigation involved the use of:

- Detailed mapping based on existing data sources applicable to the study area;
- Geographic Information System base maps;
- Literature and existing data/reports for the study area
- A site visit will be conducted to ensure that the information gathered as part of the desktop investigation reflects the current status of the land.
- The ratings of the identified impacts were undertaken in a quantitative manner as provided in Impact Assessment Section. The ratings were undertaken in a manner to calculate the significance of each of the impacts. The EAP also assesses the outcomes of the calculation to determine whether the outcome reflects the perceived and the actual views.
- The identification of management measures are done based on the significance of the impacts and measures that have been considered appropriate and successful, specifically as Best Practical and Economical Options.



12. ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK

(This section of the report must consider all the known typical impacts of each of the activities (including those that could or should have been identified by knowledgeable persons) and not only those that were raised by registered interested and affected parties).

Table 12-1: Impact Assessment Rating (Pl: Planning, Co: Construction, Op: Operation, Cl: Closure, Dc: Decommissioning, Re: Rehabilitation)

Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
All	Planning of prospecting activities	No impacts are foreseen due to the non-invasive nature of the planning phase	All	N/A	N/A	N/A	N/A	N/A	N/A		
All	Consultation of affected parties	N/A	All	N/A	N/A	N/A	N/A	N/A	N/A		
All	Potential construction of roads and infrastructure	None foreseen as existing access roads will be used to access the proposed sampling areas	Co	N/A	N/A	N/A	N/A	N/A	N/A		
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Temporary disturbance of wildlife due to increased human presence and possible use of machinery	O	Footprint	Short term	Low	Possible	Low to medium	Low	Medium - High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
		and/or vehicles									
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Site	Short term	Low	Possible	Low to medium	Low	Medium - High	Low
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	O	Site	Short term	Low	Possible	Low to medium	Low	Medium - High	Low
	Site clearance (if	Loss of CBA1 and	O	Site	Short term	Low	Possible	Low to medium	Low	High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	needed) to allow for collection of 10 samples in a 500 m radius	ESA and other sections of area classed as other natural Areas									
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement of Faunal community due to temporary habitat loss, disturbance (noise, dust, and vibration) and/or direct mortalities	O	Site	Short term	Low	Possible	Low to medium	Low	Medium - High	Low
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Continued disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	O	Footprint	Short to Medium term	Low	Possible	Low to medium	Low	Medium - High	Low
	Site clearance (if needed) to allow for collection of	Encroachment by alien invasive plant species	O, CI	Footprint	Medium term	Low	Possible	Low to medium	Low	Medium	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	10 samples in a 500 m radius										
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Site	Short to Medium term	Low	Possible	Low to medium	Low	Medium - High	Low
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	O	Site	Short to Medium term	Low	Possible	Low to medium	Low	Medium - High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Site	Short term	Low	Possible	Low to medium	Low	Medium - High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	O	Site	Short term	Low	Possible	Low to medium	Low	Medium - High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Further impacts due to the spread and/or establishment of alien and/or invasive species	O	Site	Medium term	Low	Possible	Low to medium	Low	High	Low
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Further impacts due to the spread and/or establishment of alien and/or invasive species	O	Site	Medium term	Low	Possible	Low to medium	Low	High	Low
	Collection of surface samples	Displacement, direct mortalities	O	Site	Short to Medium term	Low	Possible	Low to medium	Low	High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	from 10 points in a radius of 500 m for each of the 12 sites	and disturbance of faunal community due to habitat loss and disturbances such as dust, vibrations poaching and noise.									
Ground water	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Degradation of aquifers	O	Site	Medium term	Low	Possible	Low to medium	Low	Medium - High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts of existing groundwater users	O	Site	Medium term	Low	Possible	Low to medium	Low	Medium	Low
Heritage Resources	Collection of surface samples from 10 points in a radius of 500	Impacts on potential burial grounds and graves	O	Footprint	Short to Medium term	Low	Improbable	Low to medium	Low	High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	m for each of the 12 sites										
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on archaeological resources	O	Footprint	Short to Medium term	Low	Improbable	Low	Low	High	Low
Noise	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Noise nuisance	O	Site	Short to Medium term	Low	Possible	Low to medium	Low	Medium - High	Low
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Pollution of soil	O	Site	Short to Medium term	Low	Possible	Low	Low	High	Low
Air	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Air Quality	O	Site	Short to Medium term	Low	Possible	Low to medium	Low	Medium	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Deterioration and damage to existing access roads and tracks	O, D	Site	Medium term	Low	Possible	Low to medium	Low	High	Low
Socio-economic	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential job creation	O, D	Regional	Medium term	Medium	Possible	Low	Low	High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Safety and security to existing landowners and lawful occupier	O, D	Site	Medium term	Medium	Possible	Low to medium	Low - Medium	Medium - High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Interference with existing land uses	O, D	Site	Medium term	Medium	Possible	Low to medium	Low - Medium	Medium	Low
Waste	Collection of surface samples	Generation and disposal of waste	O, D	Site	Short term	Low	Possible	Low	Low	High	Low



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	from 10 points in a radius of 500 m for each of the 12 sites										
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Erosion due to improper rehabilitation	D	Footprint	Short term	Low	Possible	Low to medium	Low	High	Low
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential soil pollution from hydrocarbon s spills from vehicles used to access the stie	O	Footprint	Short term	Low	Possible	Low to medium	Low	High	Low
Land Use	Site access to the proposed sampling site	Potential impact on the disposal of waste on the sampling area by the operational mining company	O	Site	Short term	Medium	Likely	High	Medium	Medium	Low-Medium
Land Use	Collection of surface samples from 10	Potential impact on the disposal of waste on	O	Site	Short term	Medium	Likely	High	Medium	Medium	Low-Medium



Aspect	Activity	Impact	Phase	Extend	Duration	Intensity	Probability	Weighing Factor	Significance	Mitigation Efficiency	Significance with Mitigation
	points in a radius of 500 m for each of the 12 sites	the sampling area by the operational mining company									
Service provision: Electricity	Site access to the proposed sampling site	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	O	Site	Short term	Medium	Possible	High	Medium	Medium	Low-Medium
Service provision: Electricity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	O	Site	Short term	Medium	Possible	High	Medium	Medium	Low-Medium
All	Rehabilitation of disturbed sites	Rehabilitation of sampling area to predetermined land use	Re	Footprint	Short term	Low	Possible	Low to medium	Low	High	Low



13. SUMMARY OF SPECIALIST REPORTS.

(This summary must be completed if any specialist reports informed the impact assessment and final site layout process and must be in the following tabular form): -

List of studies undertaken	Recommendations of specialist reports	Specialist recommendations that have been included in the eia report <i>(mark with an x where applicable)</i>	Reference to applicable section of report where specialist recommendations have been included.
No specialists were appointed for this project and all information is based on available documentation for the area			

14. ENVIRONMENTAL IMPACT STATEMENT

14.1. Summary of the key findings of the environmental impact assessment

The findings are that the proposed prospecting activities will result in low, low-medium and medium impact for the identified aspects of the physical and socio-economic environment. Low impacts in terms of disturbances such as dust, lighting and noise may arise from the sampling activities. The highest rating, medium were identified on the operational aspects of the residue deposits / stockpiles on which the proposed sampling activities will take place.

All-natural areas including watercourses/wetlands and primary vegetation areas have been excluded from sampling sites.

All historical features such as buildings and graves/graveyards have been excluded from sampling sites.

There is a risk of hydrocarbon pollution due to leakage from vehicles and machinery, but this can be managed and mitigated to acceptable levels.

Monitoring of the required mitigation measures is to take place on site at a continuous basis by the project manager, contractors and Environmental Control Office (ECO).

Annual monitoring audits are to take place by an appointed independent environmental assessment practitioner.

14.1.1. Final Site Map

Provide a map at an appropriate scale which superimposes the proposed overall activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. Attach as Appendix 4

The whole applicable area sensitivity is indicated in Figure 14-1.

Figure 14-2 shows the location of the 12 sampling sites where about 10 samples will be taken from each sampling site within a 500 m radius. The exact location of the 10 sub-sampling points cannot be pinpointed as the prospecting activities are conducted in phases, and each phase depends on the success of the previous phase. Within the 500 m radius of the 12 surface sample points, 10 samples will be collected. When the geologist goes to site they will have to determine where they will get a representative sample. **Again from this figure it is noted that some of the sites and 500 m radius fall within areas classified as Very High. Reference is again made to Table 10-3 that indicate that the proposed area is already disturbed by the mining activities thus it is proposed that the sensitivity rating of Very High for these already impacted areas can be reduced to Medium.**

Should drilling be needed for phase two, the drill points will be identified after the first sampling phase have confirmed the presence of the ore body. The sensitive areas for future phases will be identified during the planning phase of the project and no activities will be undertaken at any sensitive area. A detailed map can be produced after the sampling surveys has been undertaken, although the map will be subjected to changes depending on the results of the preliminary sampling.

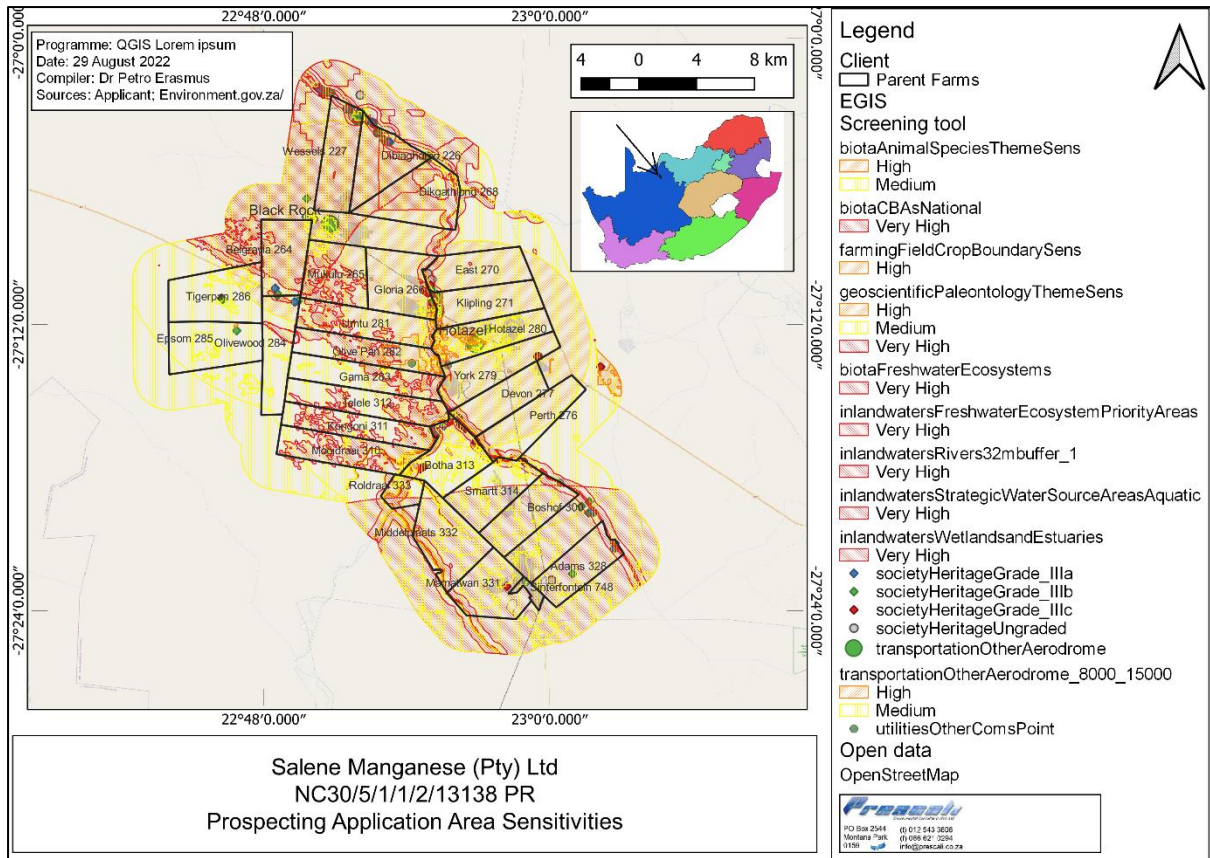


Figure 14-1: Application area sensitivities

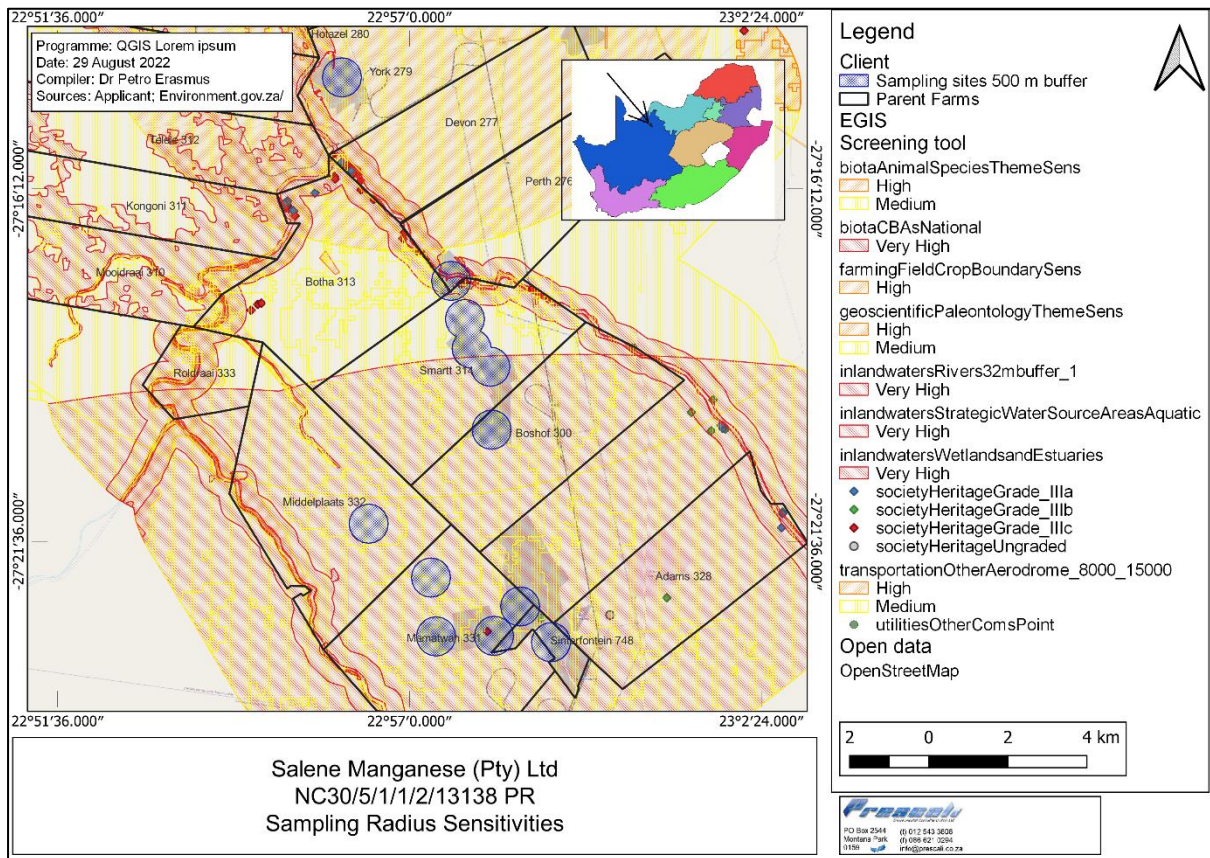


Figure 14-2: Final Site Map with sensitivities for the 500 m radius around each sampling point (medium, high and very high) as per the Screening tool



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

Refer to Table 11-1 which highlights all the positive and negative impacts for the proposed prospecting activities. The proposed activities have low significance since these are short term activities that will take place on already disturbed areas, however socio-economic impacts such as employment has a medium significance. The probability of occurrence of an impact was determined and most of these activities can be controlled and impacts can be reduced or avoided. Generally, depending on the type of prospecting activities proposed, prospecting activities have low impact on the environment. The planned activities negative impacts can be controlled and avoided or minimised therefore the layout does not require revision. Mitigation measures will be utilised to control, avoid and/or minimise all identified potential impacts.

15. PROPOSED IMPACT MANAGEMENT OBJECTIVES AND THE IMPACT MANAGEMENT OUTCOMES FOR INCLUSION IN THE EMPR

Based on the assessment and where applicable the recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation.

Impact management objectives are described in terms a Mitigation Hierarchy proposed as follows:

- **Avoid at Source:** Reduce at Source: avoiding or reducing at source through the design of the Project (e.g., avoiding by placing or re-routing activity away from sensitive areas or reducing by restricting the working area or changing the time of the activity).
- **Abate on Site:** add something to the design to abate the impact (e.g., pollution control equipment, installation of noise silencers, operate in daylight hours).
- **Abate at Receptor:** if an impact cannot be abated on-site then control measures can be implemented off-site (e.g., noise barriers to reduce noise impact at a nearby residence or fencing to prevent animals straying onto the site).
- **Repair or Remedy:** some impacts involve unavoidable damage to a resource (e.g. agricultural land due to creating access, work camps or materials storage areas) and these impacts can be addressed through repair, restoration or reinstatement measures.
- **Compensate in Kind; Compensate Through Other Means:** where other mitigation approaches are not possible or fully effective, then compensation for loss, damage and disturbance might be appropriate (e.g., planting to replace damaged vegetation, financial compensation for damaged crops or providing community facilities for loss of resources, recreation and amenity space)

The EMPr will seek to achieve a required end state and describe how activities could have an adverse impact on the environment will be mitigated, controlled and monitored. The EMPr will address the environmental impacts during the Operational, and Decommissioning Phases of the proposed project as no impacts were identified during the Planning and Construction phases. Due regard will be given to environmental protection during the entire project. A number of environmental recommendations will therefore be made to achieve environmental protection. The environmental and social objectives will be set to allow prospecting in an environmental and socially responsible manner while ensuring that sustainable closure can be achieved. To achieve closure, the correct decisions need to be taken during the planning phase of the project.

The overall goal for environmental management for the proposed is to manage and operate the project in a manner that:

- Minimises the ecological footprint of the project on the local environment;
- Facilitates harmonious co-existence between the project and other land uses / operational mining activities in the area;
- Contributes to the environmental baseline and understanding of environmental impacts of Prospecting activities in a South African context.

The following environmental management objectives are recommended for the proposed mineral prospecting development and associated infrastructure (none identified):

- Monitor soils (if any are present at the sampling site) so as to avoid unnecessary erosion, and implement erosion control measures to preserve the quality of the soil for rehabilitation;
- Development planning must restrict the area of impact to minimum and designated areas only;



- Monitor and prevent contamination, and undertake appropriate remedial actions;
- Limit the visual and noise impact on receptors;
- Avoid impact on possible heritage and archaeological resources;
- Ensure that accurate information regarding the prospecting activities to be undertaken and the resultant lack of requirements for site access and labour is communicated to I&APs;
- Prevent the unnecessary destruction of, and fragmentation, of the vegetation community (including portions of a CBA1, CBA2 and ESA and a section classed as high and highest biodiversity importance);
- Adhere to an open and transparent communication procedure with stakeholders at all times;
- Enhance project benefits and minimise negative impacts through consultation with stakeholders;
- To limit interference with existing land uses as far as possible during prospecting;
- Limit the impact on the groundwater and surface water features through the implementation of the EMPr and the impact mitigation measures;
- Promote health and safety of workers;
- Limit dust and other emissions to within allowable limits; **and**
- **Plan any future phases of prospecting so that it will not interfere with the electricity generation infrastructures operations.**

16. ASPECTS FOR INCLUSION AS CONDITIONS OF AUTHORISATION.

Any aspects which must be made conditions of the Environmental Authorisation

Refer to Section 18.2 for the main management measures that should be included in the authorisation. In addition, the appointed contractors should adhere and be compliant with the health and safety requirements of the different mining areas in which the sampling will be conducted. Should drilling be required the correct procedure will be followed to obtain the required permissions and work instructions from the relevant surface occupiers. **Drilling will only be considered once sampling as outlined in this report for the 12 sites proves successful. This BAR only covers basic surface sampling activities. Should drilling be considered, an amendment to the environmental authorization will be applied for.**

17. DESCRIPTION OF ANY ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE.

(Which relate to the assessment and mitigation measures proposed)

- The EAP does not accept any responsibility in an event that additional information comes to light at a later stage of the process;
- All information provided by the EAP was correct at the time it was provided;
- The data from unpublished researches and open resources is valid and accurate;
- The scope of this investigation is limited to accessing the potential environmental impacts associated with the proposed project;
- The public participation process has sought to involve key stakeholders and individual landowners. It is assumed that where participation has been sought from the organisational representative/s, that these parties have the authority to comment on behalf of their organisation;
- Third party information provided by the applicant is correct at the time of writing this report;
- Prospecting activities will take place in phases and each phase is determined and dependent on the previous phase. Accordingly, the final drilling locations **should an additional prospecting phase be needed**, if any, will only be determined later and an application for an amendment of the environmental authorisation will be lodged.

18. REASONED OPINION AS TO WHETHER THE PROPOSED ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED

18.1. Reasons why the activity should be authorized or not.

No fatal flaws were identified in terms of this project as long as the mitigation and recommendations proposed are adhered to. The impact assessment indicated no critical issues that cannot be lowered to an acceptable level through the suggested mitigation measures, resulting in a fatal flaw. All sensitive areas identified throughout the process will be excluded from the proposed development.



It is recommended by the EAP that the proposed prospecting could be authorised, on the assumption that the environmental and social management commitments included in this BAR/EMPr are adhered to, the project description remains as per the description provided in this document and considering the positive social impacts associated with the project. It should also be ensured that proper rehabilitation is provided for and that risks are controlled by having emergency plans in place.

It is therefore the opinion of the EAP that the proposed activity should be authorised.

18.2. Conditions that must be included in the authorisation

Salene Manganese (Pty) Ltd should comply with all applicable legislation including those outlined in Part A, Section 6.

- Access agreements will be entered into with all holders of existing Mining Rights in order to comply with respective access and MHS standards.
- Notice must be given to landowners and surrounding landowners 1 month prior to any prospecting activities being conducted on their areas of responsibility;
- Landowners and land occupiers should be engaged at least 1 month prior to any site activities being undertaken;
- A map detailing the sub-sampling locations (10 within the 500 m radius of the sampling point) should be provided to the landowners as well as the DMR after completion of the prospecting activities;
- A record must be kept of the implementation of the EMPr measures and monitoring of the efficiency of the implemented measures;
- Measures and recommendations suggested in this report should be followed;
- An Environmental Control Officer should be appointed to do regular monitoring as suggested in the EMPr;
- In the unlikely event that graves / other sites of cultural / heritage significance are identified, these should be protected *in situ* and a 30 m buffer area should be applied where no prospecting activities may take place;
- All wetlands and watercourses should be protected *in situ* and a 30m buffer area should be applied where no prospecting activities may take place;
- The combined sensitivity map and the findings indicated in Table 10-3 as well as Part A, Section 14.1.1, should be followed where no activity may take place within highly sensitive areas;
- Rehabilitation should take place immediately after work has ceased and should be done in a responsible manner.
- Disturbance of protected trees and plants are not permitted without the necessary Forest Act Licence and/or Flora Permit (both may be required), obtainable for the relevant Departments whose mandate it is to issue such permits and licenses and
- The holder of the Environmental Authorisation (if granted), must appoint a suitably qualified specialist to do a search and rescue of plants of conservation concern that can be relocated successfully (after obtaining the necessary permits or licences to do so, but prior to any disturbance of the natural vegetation).

19. PERIOD FOR WHICH THE ENVIRONMENTAL AUTHORISATION IS REQUIRED.

The Prospecting Right has been applied for a period of five (5) years. The Environmental Authorisation should therefore allow for the five years of prospecting and one year for decommissioning and rehabilitation.

Name Of Activity	Aerial Extent Of The Activity	Applicable Listing Notice	Time Frame For Authorization
Sampling site	10 x 12 Sampling Site 1 Sample site= 1 m ² Total Sampling Site Area= 120 m ²	GNR 983 (as amended 07 April 2017) Listed Activity 20	5 Years
Rehabilitation and Closure	120 m ²	GNR 983 (as amended 07 April 2017) Listed Activity 22	1 Year after completion of prospecting



20. UNDERTAKING

Confirm that the undertaking required to meet the requirements of this section is provided at the end of the EMPr and is applicable to both the Basic assessment report and the Environmental Management Programme report.

The EAP undertakes that the information provided is correct, and that the comments and inputs from stakeholders and Interested and Affected parties have been correctly recorded in the report.

21. FINANCIAL PROVISION

State the amount that is required to both manage and rehabilitate the environment in respect of rehabilitation.

The preliminary estimate of the rehabilitation cost is (inclusive of contingencies and VAT): **R4 678.76**. Due to the low monetary amount calculated for the financial provisioning using the method as outlined, the applicant will provide the minimum financial rehabilitation as requested by the DMRE before the issuing of the prospecting permit if / when approved in terms of the MPRDA.



Table 21-1: Quantum calculations

Calculation of the Quantum							
Applicant:	Salene Manganese (Pty) Ltd			Reference: NC30/5/1/1/2/13138 PR			
EAP:	Prescali Environmental Consultants (Pty) Ltd			Date: 29/08/2022			
No	Description	Unit	A	B	C	D	E=A*B*C*D
			Quantity	Master rate	Multiplication factor	Weighting factor 1	Amount (Rands)
1	Dismantling of processing plant and related structures (including overland conveyors and powerlines) - Vermiculite and SSP plant	m ³	0	16,14	1	1	R0,00
2 (A)	Demolition of steel buildings and structures (including floor slabs)	m ²	0	224,76	1	1	R0,00
2 (B)	Demolition of reinforced concrete buildings and structures (gate house, admin office, truckers ablution, clinic)	m ²	0	331,22	1	1	R0,00
3	Rehabilitation of access roads (13m width for 2,8 km)	m ²	0	40,22	1	1	R0,00
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	390,37	1	1	R0,00
4(B)	Demolition and rehabilitation of non-electrified railway lines	m	0	212,92	1	1	R0,00
5	Demolition of housing/and or administration facilities	m ²	0	449,51	1	1	R0,00
6	Opencast rehabilitation including final voids and ramps (vermiculite pit)	ha	0	228777,57	1	0,04	R0,00
7	Sealing of shafts adits and inclines	m ³	0	120,66	1	1	R0,00
8 (A)	Rehabilitation of overburden and spoils (vermiculite)	ha	0,012	152098,35	1	1	R1 825,18
8(B)	processing waste deposits and evaporation ponds (non-polluting potential)	ha	0	195655,69	1	1	R0,00
8©	Rehabilitation of processing waste deposits and evaporation ponds (non-polluting potential)	ha	0	568276,85	1	1	R0,00
9	Rehabilitation of subsided areas	ha	0	121541,19	1	1	R0,00
10	General surface rehabilitation, including grassing of all denuded areas	ha	0,012	124443,64	1	1	R1 493,32
11	River diversions	ha	0	124443,64	1	1	R0,00
12	Fencing	ha	0	141,95	1	1	R0,00
13	Water management		0	47316,97	1	1	R0,00
14	2 to 3 years of maintenance and aftercare	ha	0	16560,94	1	1	R0,00
15 (A)	Specialist study			65000			R 0.00
15 (B)	Specialist study			0			R 0.00
Sub Total 1 (Sum of items 1 to 15)							R3 318,50
Add 6% if Sub Total 1 is ≥ R 1000							
Add 12% if Sub Total 1 is ≤ R 1000							
1	Preliminary and General	6% of Subtotal 1		Weighting factor 2 (Step 4.4)			
		12% of Subtotal 1		R398,22	1,05		R418,13
2	Contingency	10.0% of Subtotal 1					R331,85
Sub Total 2 (Sub Total 1 plus sum of management and contingency)							R4 068,49
VAT (15%)							R610,27
GRAND TOTAL (Subtotal 3 plus VAT)							R4 678,76

21.1. Explain how the aforesaid amount was derived.

The Regulations Pertaining to the Financial Provision for Prospecting, Mining or Production Operations promulgated under section 44(aE), (aF), (aG), (aH) read with sections 24(5)(b)(ix), 24(5)(d), 24N, 24P and 24R of the National Environmental Management Act, 1998 (Act No.107 of 1998) (20 November



2015) have been considered and this is anticipated to result in an increase in the rehabilitation costs estimated using above mentioned quantum.

21.2. Confirm that this amount can be provided for from operating expenditure.

(Confirm that the amount, is anticipated to be an operating cost and is provided for as such in the Mining work programme, Financial and Technical Competence Report or Prospecting Work Programme as the case may be).

The Applicant has direct access to sufficient financial resources required as per the budget to enable it to conduct the proposed prospecting operation optimally in accordance with the Prospecting Work Program. The applicant has provided proof of financial ability during the application phase on the DMR SAMRAD system.

22. SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

22.1. Compliance with the provisions of sections 24(4)(a) and (b) read with section 24 (3) (a) and (7) of the National Environmental Management Act (Act 107 of 1998) the EIA report must include the: -

22.1.1. Impact on the socio-economic conditions of any directly affected person.

Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any directly affected person including the landowner, lawful occupier, or, where applicable, potential beneficiaries of any land restitution claim, attach the investigation report as an Appendix.

Current land uses inside the prospecting area, such as existing mining areas and residue deposits / stockpiles may be temporarily impacted for the proposed sampling of the 12 areas as outlined in this report. These are however, small areas. These areas will be rehabilitated post sampling and activities and the areas will once again become available for depositing of waste material. Far areas that are not activity used for depositing where the area may be leased / used for grazing, the surface right users may have issues like leaving the gates open which poses security concerns and opening of many access roads.

The potential exists for a group of unfamiliar workers to enter the project area during the prospecting activities. This impact could potentially affect the local communities; however, the impact will be negligible as the people on site will be limited to the Applicant, contractor and geologists for the sampling phase.

The consultation process will allow directly affected parties to raise their concerns. Further to this, it must be noted that I&AP's, including directly affected parties such as landowners, have the opportunity to review and comment on this report. The results of the public consultation have been included in the final report submitted to the department for adjudication.

22.1.2. Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act.

Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) with the exception of the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act, attach the investigation report as Appendix 2.19.2 and confirm that the applicable mitigation is reflected in 2.5.3; 2.11.6 and 2.12. herein).

Mitigation measures proposed in this report include that no sample site will be located within 30 m of any identified heritage site (Figure 14-2) based on the desktop work undertaken. Should any paleontological or cultural artefacts be discovered, work at the point of discovery must stop, the location be clearly demarcated and SAHRA is contacted immediately. Work at the discovery site may only be recommenced on instruction from SAHRA.

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

(the EAP managing the application must provide the competent authority with detailed, written proof of an investigation as required by section 24(4)(b)(i) of the Act and motivation if no reasonable or feasible alternatives, as contemplated in sub-regulation 22(2)(h), exist. The EAP must attach such motivation as Appendix).

This BAR and EMPr has been compiled in accordance with the NEMA (1998), EIA Regulations (2014, amended April 2017) and MPRDA (2002). The EAP managing the application confirms that this BAR and EMPr is being submitted for Environmental Authorisation in terms of the National Environmental



Management Act, 1998 in respect of listed activities that have been triggered by application in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (as amended). Should the DMR require any additional information, this will be provided upon request. No reasonable or feasible alternatives exist for this Prospecting Right Application and as such, motivation for no alternatives has been provided in the relevant sections above.



PART B ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

1. DETAILS OF THE EAP

(Confirm that the requirement for the provision of the details and expertise of the EAP are already included in PART A, section 1(a) herein as required).

The details of the EAP are provided in Section 1.1 of PART A of this document.

2. DESCRIPTION OF THE ASPECTS OF THE ACTIVITY

(Confirm that the requirement to describe the aspects of the activity that are covered by the draft environmental management programme is already included in PART A, section (1)(h) herein as required).

The requirement to describe the aspects of the activity that are covered by the final environmental management programme is already included in PART A.

3. COMPOSITE MAP

(Provide a map (Attached as an Appendix) at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers)

Refer to Figure 14-1, Figure 14-2 and Appendix 4.

4. DESCRIPTION OF IMPACT MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENTS

4.1. Determination of closure objectives.

(ensure that the closure objectives are informed by the type of environment described)

- Rehabilitation of areas disturbed as a consequence of prospecting to a land capability that will support and sustain a predetermined post-closure land use;
- Removal of all infrastructure/equipment that cannot be beneficially re-used, as per agreements established, and returning the associated disturbed land to the planned final land use;
- Removal of existing contaminated material from affected areas;
- Establishment of final landforms that are stable and safe in the long run;
Establishment and implementation of measures that meet specific closure related performance objectives.

Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.

4.2. Volumes and rate of water use required for the operation.

It is unlikely that water will be required for the sampling process as outlined in this report (12 sites with 10 samples each in a 500 m radius).

4.3. Has a water use licence (WUL) has been applied for?

No, a WUL is not required. The volume of water to be used during prospecting activities will not trigger any NWA listed activities. The Department of Water and Sanitation will be consulted as a project stakeholder.



5. IMPACTS TO BE MITIGATED IN THEIR RESPECTIVE PHASES

Measures to rehabilitate the environment affected by the undertaking of any listed activity.

Table 5-1: Mitigation measures

Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
All	Planning of prospecting activities	All		N/A		
All	Consultation of affected parties	All		Stakeholder engagement will continue throughout the prospecting activities to ensure the community and landowners are kept informed and allowed to raise issues. The Applicant shall attend applicable community meetings with the affected communities / Stakeholder. Any issues raised will then be addressed through a grievance mechanism.	NEMA, Public Participation Guidelines	All phases
All	Potential construction of roads and infrastructure	Co		N/A		
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	<ul style="list-style-type: none"> • Vegetation clearing for prospecting sites should be kept to a minimum in order to reduce the disturbance footprint; • Compaction of soil must be avoided as far as possible, and the use of heavy machinery must be restricted in areas outside of the proposed prospecting sites to reduce the compaction of soils; • All measures should be implemented to minimize the potential of dust generation; • Local residents should be notified of any potentially noisy activities or work and these activities should be undertaken at reasonable times of the day. These works should not take place at night or on weekends; • Noise attenuation on engines must be adequate, and the noisy activities must be restricted as far as is possible to times and locations whereby the potential for noise nuisance is reduced; • Ensure proper storage of fuels; 	SANS 10103, ECA Noise Regulations, NEMAQA, Dust Regulations, NWA, MPRDA, Regulations GN R527, DWAF BPG, NHRA	Throughout operation and decommissioning



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
				<ul style="list-style-type: none">• On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic;• Workforce should be kept within defined boundaries and to agreed access routes;• No invasive prospecting activities to be undertaken within 500 m of a watercourse; and• Should any watercourse be affected, then the necessary water use licences should be obtained from the Department of Water and Sanitation.• Local residents (landowners and directly adjacent landowners) should be notified of any potentially noisy activities or work and these activities should be undertaken at reasonable times of the day. This work should not take place at night or on weekends;• The contractor must attempt to restrict noisy activities as far as is possible to times and locations whereby the potential for noise nuisance is reduced;• On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic;• Workforce should be kept within defined boundaries and to agreed access route;• Should any artefacts be uncovered during the Site Establishment phase, these must be handled in accordance with the requirements of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA); and• If a possible heritage site (including graves) or artefact is discovered during Site Establishment, all		



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
				operations in the vicinity of the discovery (at least 30 m buffer) should stop and a qualified specialist contracted to evaluate and recommend appropriate actions; <ul style="list-style-type: none"> • Any spills of hydrocarbons or fluids used during operation, must be cleaned up immediately; and • Soils in sampling areas where disturbances will be encountered must be stripped and stockpiled outside affected areas for use after completion of the sampling program. 		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	120	<ul style="list-style-type: none"> • Demarcation of sensitive areas in consultation with relevant specialists and ECO; • Utilise local labour if possible; • Minimise removal of vegetation as far as possible; • Identification and relocation of protected species by a qualified ecologist (and application or the relevant biodiversity permits where required); • Minimize dust generation; • Limit vehicle access; • Implement alien vegetation management; • Ongoing identification of risks and impacts; • Emergency preparedness; • Monitoring and review; and • Avoid disturbance of fauna as much as possible, especially bird nesting sites 	NEMA, MPRDA, NEMBA, NEMAQA, Dust regulations, NWA, DWAF Best Practice Guideline	Throughout operation
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	120	Refer to "Site clearance (if Needed) to allow for collection of 10 samples in a 500 m radius" under Biodiversity above.		



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
Biodiversity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O, CI	120	Refer to "Site clearance (if Needed) to allow for collection of 10 samples in a 500 m radius" under Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	120	Refer to "Site clearance (if Needed) to allow for collection of 10 samples in a 500 m radius" under Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	120	Refer to "Site clearance (if Needed) to allow for collection of 10 samples in a 500 m radius" under Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	120	Refer to "Site clearance (if Needed) to allow for collection of 10 samples in a 500 m radius" under Biodiversity above.		
	Collection of surface samples from 10 points in	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
	a radius of 500 m for each of the 12 sites					
Groundwater	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
Heritage Resources	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
Noise	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	<ul style="list-style-type: none"> • Trucks, machinery and equipment must be regularly serviced to ensure they are in proper working condition and to reduce risk of leaks. All leaks must be cleaned up immediately using spill kits or as per the emergency response plan. For large spills a hazardous materials specialist shall be utilized; • Accidental hydrocarbon spillages must be reported immediately, and the affected soil should be removed, and rehabilitated or if this is not possible, disposed of at a suitably licenced waste disposal facility 	NWA, DWAF BPG, NEMA	Throughout operation



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
Air	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		
Socio-economic	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	120	Should any temporary employment opportunities be generated it is advised that the applicant advertise in a local newspaper.	Company Employment policy	As needed
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites" under land use below.		
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	120	Refer to "Site Access" under Land use below.		
Waste	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	120	<ul style="list-style-type: none"> • Waste generated on site must be recycled as far as possible. Recyclable waste must not be stored on site for excessive periods to reduce risk of environmental contamination; and • A Waste Management System must be implemented, and provide for adequate waste storage (in the form of enclosed containers) waste separation for recycling, and frequent removal of non-recyclable waste for permanent disposal at an appropriately licensed waste disposal facility. No waste material is to be disposed of on site. 	DWAF Minimum requirements for waste disposal, NEMWA	Throughout operation
Soil	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	D	120	Refer to "Collection of surface samples from 10 points in a radius of 500 m from each of the 12 sites" as outlined for Biodiversity above.		



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	As per access road used and incident	<ul style="list-style-type: none">• All hazardous substances (e.g., fuel, grease, oil, brake fluid, hydraulic fluid) must be handled, stored and disposed of in a safe and responsible manner so as to prevent pollution of the environment or harm to people or animals.• Appropriate measures must be implemented to prevent spillage and appropriate steps must be taken to prevent pollution in the event of a spill in a way that does not pose any danger of pollution even during times of high rainfall;• Hazardous substances must be confined to specific and secured areas, and stored at all time within bunded areas;• Adequate spill prevention and clean-up procedures should be developed and implemented during the prospecting activities; and• Should any major spills of hazardous materials take place, such should be reported in terms of the Section 30 of the NEMA.	NWA, NEMWA, DWAF Best Practice Guideline, NEMA	Throughout operation
Land Use	Site access to the proposed sampling site	O	As per applicable site existing mining access	<ul style="list-style-type: none">• All employees and visitors to the site must undergo a site induction which shall include basic environmental awareness and site-specific environmental requirements;• Landowners/lawful occupiers must be notified prior to accessing properties. A date and time that is suitable to landowners/lawful occupiers and is reasonable to the applicant should be negotiated and agreed upon;• The number, identity of workers, work location and work to be done must be provided to the landowner/lawful occupier prior to going on site;• Consideration must be taken by the applicant and/or contractors when on site not to interfere with the existing land uses and practices.	NEMA, OHS and MHSA	Throughout operation



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
Land Use	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	As per applicable site existing mining operations	<ul style="list-style-type: none"> • Where possible, sampling sites should be located along existing access roads to reduce the requirement for additional access roads; • Any new temporary access routes to a sample site should result in minimal disturbance to existing vegetation; • Prior to accessing any portion of land, the Applicant must enter into formal written agreements with the affected landowner. This formal agreement should additionally stipulate landowners' special conditions which would form a legally binding agreement; All farm gates must be closed immediately upon entry/exit; • Under no circumstances may the contractor damage any farm gates, fences, etc.; • On-site vehicles must be limited to approved access routes and areas on the site so as to minimize excessive environmental disturbance to the soil and vegetation on site, and to minimize disruption of traffic (where relevant); • All vehicles using public roads must be in a roadworthy condition and their loads secured. They must adhere to the speed limits and all local, provincial and national regulations with regards to road safety and transport; • All measures should be implemented to minimize the potential of dust generation; and • Workers must be easily identifiable by clothing and ID badges. Workers should carry with them, at all times a letter from the applicant stating their employment, title, role and manager contact details. 	NWA, NEMWA, OHSS, MHSA	Throughout operation
Service provision: Electricity	Site access to the proposed sampling site	O	120	<ul style="list-style-type: none"> • Any amendments to this document must take into consideration the planned ESKOM activities and correspondence with ESKOM will be a priority should future additional activities, e.g. drilling be 	NEMA, DWAF Best Practice Guideline	



Aspect	Activity	Phase	Size & Scale (m ²)	Mitigation Measures	Compliance with Standards	Time period for implementation
				located within the ESKOM expansion areas. Of importance here is the proposed UMTO substation expansion, corridors and solar plants (planned and existing), refer to Figure 5-1. <ul style="list-style-type: none"> The prospecting right holder will comply with the requirements as outlined in the document "Eskom requirements for works at or near Eskom infrastructure and servitudes" in Appendix 8. A solar plant is located on York 279 and the location of any future prospecting activities needs to be planned in accordance with the development in mind. 		
Service provision: Electricity	Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	120	The prospecting right holder will comply with the requirements as outlined in the document "Eskom requirements for works at or near Eskom infrastructure and servitudes" in Appendix 8.	Eskom requirements	As needed
All	Rehabilitation of disturbed sites	Re	120	<ul style="list-style-type: none"> Restoration and rehabilitation of disturbed areas must be implemented as soon as prospecting activities are completed; Sites must be restored to the original condition with vegetation cover (where applicable) equalling the surrounding vegetation cover; All debris and contaminated soils must be removed and suitably disposed of; Contours and natural surrounding must be reformed; Natural drainage patterns must be restored; Temporary access routes/roads must be suitably rehabilitated; and Sites must be monitored by the ECO (including relevant specialist's inputs if, necessary) for adequate rehabilitation until the desired rehabilitation objectives have been achieved. 	MPRDA, Rehab Plan, NEMA	Rehabilitation

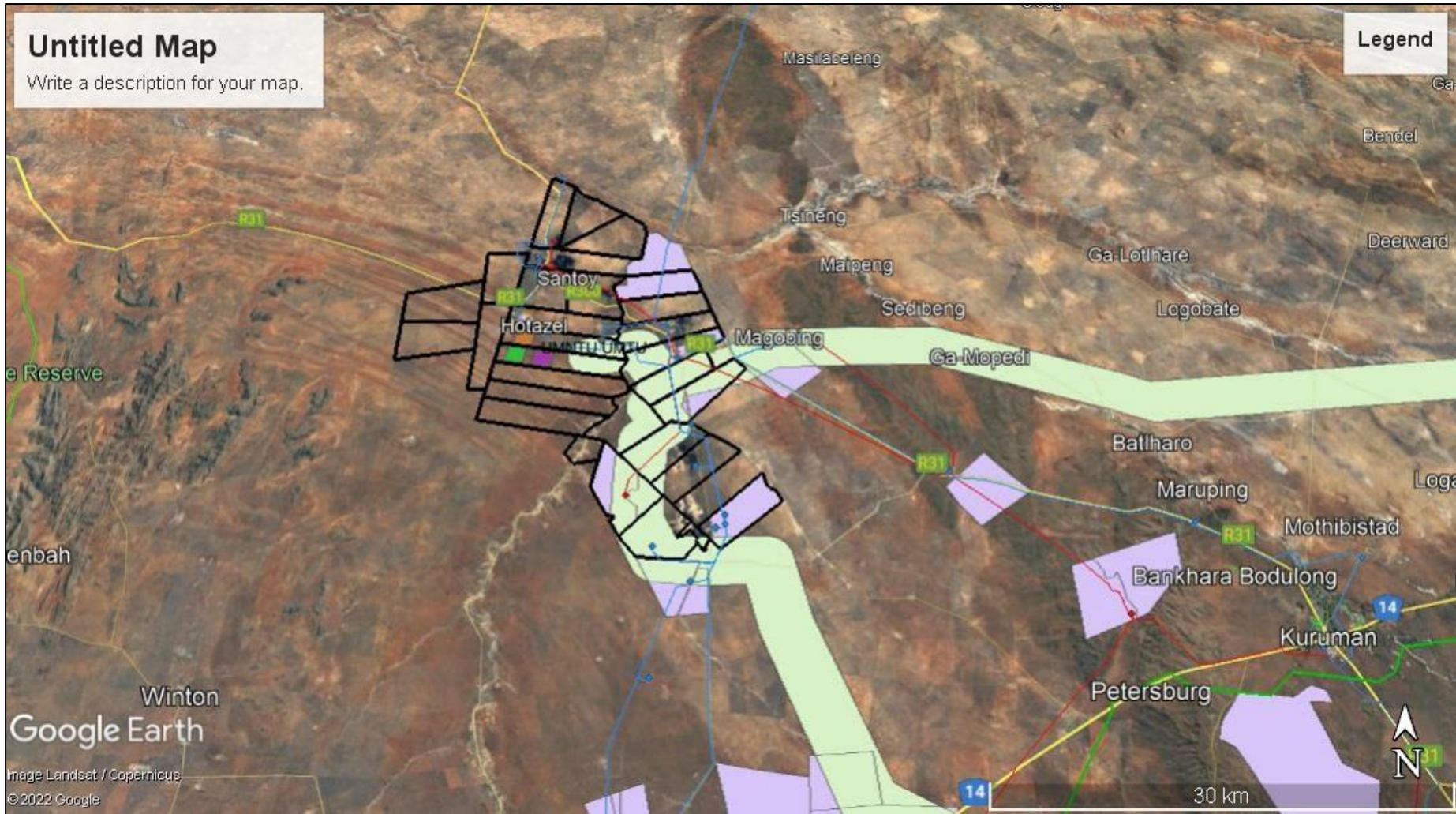


Figure 5-1: ESKOM Umto Substation, Solar Plants (Potential and existing) and corridors³⁸

6. IMPACT MANAGEMENT ACTIONS AND OUTCOMES



Table 6-1: Summary of Impact Management Actions and Outcomes

Activity	Phase	Impact	Aspects Affected	Mitigation Type	Standard to be Achieved
Planning of prospecting activities	All	No impacts are foreseen due to the non-invasive nature of the planning phase	All	N/A	N/A
Consultation with affected parties	All	N/A	All	N/A	N/A
Potential construction of roads and infrastructure	Co	None foreseen as existing access roads will be used to access the proposed sampling areas	All	N/A	N/A
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Temporary disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g. speed limit enforcement, vehicle maintenance)	NEMA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	Loss of CBA1 and ESA and other sections of area classed as other natural Areas	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g.	NEMA, NEMBA, CARA, Threatened or Protected

³⁸ As per Email from Mr John Geering dated 26 August 2022



Activity	Phase	Impact	Aspects Affected	Mitigation Type	Standard to be Achieved
				speed limit enforcement, vehicle maintenance)	Species (TOPS) regulations, NEMAQA
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Displacement of Faunal community due to temporary habitat loss, disturbance (noise, dust, and vibration) and/or direct mortalities	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Continued disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O, CI	Encroachment by alien invasive plant species	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g. speed limit enforcement, vehicle maintenance)	NEMA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g. speed limit enforcement, vehicle maintenance)	NEMA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g., speed limit enforcement, vehicle maintenance)	NEMA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA



Activity	Phase	Impact	Aspects Affected	Mitigation Type	Standard to be Achieved
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Further impacts due to the spread and/or establishment of alien and/or invasive species	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	O	Further impacts due to the spread and/or establishment of alien and/or invasive species	Biodiversity	Avoid and control through implementation of EMP mitigation measures (e.g., speed limit enforcement, vehicle maintenance)	NEMA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbances such as dust, vibrations poaching and noise.	Biodiversity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Degradation of aquifers	Groundwater	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Impacts of existing groundwater users	Groundwater	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Impacts on potential burial grounds and graves	Heritage Resources	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Impacts on archaeological resources	Heritage Resources	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Noise nuisance	Noise	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines



Activity	Phase	Impact	Aspects Affected	Mitigation Type	Standard to be Achieved
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Pollution of soil	Soil	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Air Quality	Air	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	Deterioration and damage to existing access roads and tracks	Air	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	Potential job creation	Socio- economic	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	Safety and security to existing landowners and lawful occupier	Socio- economic	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	Interference with existing land uses	Socio- economic	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O, D	Generation and disposal of waste	Waste	Avoid and control through implementation of EMP mitigation measures (e.g. speed limit enforcement, vehicle maintenance)	DWAF minimum requirement for waste disposal
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	D	Erosion due to improper rehabilitation	Soil	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a	O	Potential soil pollution from hydrocarbons spills from	Soil	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust



Activity	Phase	Impact	Aspects Affected	Mitigation Type	Standard to be Achieved
radius of 500 m for each of the 12 sites		vehicles used to access the stie			regulations, NWA, DWAF best Practice Guidelines
Site access to the proposed sampling site	O	Potential impact on the disposal of waste on the sampling area by the operational mining company	Land Use	Avoidance and control through preventative measures (e.g. communication with landowners, site access control) Remedy through application of mitigation measures in EMP	NEMA, MPRDA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Potential impact on the disposal of waste on the sampling area by the operational mining company	Land Use	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Site access to the proposed sampling site	O	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	Service provision: Electricity	Avoidance and control through preventative measures (e.g. communication with landowners, site access control) Remedy through application of mitigation measures in EMP	NEMA, MPRDA, NEMBA, CARA, Threatened or Protected Species (TOPS) regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	O	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	Service provision: Electricity	Control through implementation of EMPR mitigation measures	SANS10103, ECA, Noise Regulations, NEMAQA, Dust regulations, NWA, DWAF best Practice Guidelines
Rehabilitation of disturbed sites	Re	Rehabilitation of sampling area to predetermined land use	All	Control through implementation of EMPR mitigation measures	MPRDA In accordance with Rehabilitation plan



7. FINANCIAL PROVISION

7.1. Determination of the amount of Financial Provision.

On the 20th of November 2015 the Minister promulgated the Financial Provisioning Regulations under the NEMA, which will come into effect in 2021. The regulations aim to regulate the determine and making of financial provision as contemplated in the NEMA for the costs associated with the undertaking of management, rehabilitation and remediation of environmental impacts from prospecting, prospecting, mining or production operations through the lifespan of such operations and latent or residual environmental impacts that may become known in the future. These regulations provide for, *inter alia*:

- Determination of financial provision: An applicant or holder of a right or permit must determine and make financial provision to guarantee the availability of sufficient funds to undertake rehabilitation and remediation of the adverse environmental impacts of prospecting, prospecting, mining or production operations, as contemplated in the Act and to the satisfaction of the Minister responsible for mineral resources.
- Scope of the financial provision: Rehabilitation and remediation; decommissioning and closure activities at the end of operations; and remediation and management of latent or residual impacts.
- Regulation 6: Method for determining financial provision – An applicant must determine the financial provision through a detailed itemisation of all activities and costs, calculated based on the actual costs of implementation of the measures required for:
 - Annual rehabilitation – annual rehabilitation plan
 - Final rehabilitation, decommission and closure at end of life of operations – rehabilitation, decommissioning and closure plan; and
 - Remediation of latent defects.
- Regulation 10: An applicant must:
 - Ensure that a determination is made of the financial provision and the plans contemplated in regulation 6 are submitted as part of the information submitted for consideration by the Minister responsible for mineral resources of an application for environmental authorisation, the associated environmental management programme and the associated right or permit in terms of the MPRDA; and
 - Provide proof of payment or arrangements to provide the financial provision prior to commencing with any prospecting, prospecting, mining or production operations.
- Regulation 11: Requires annual review, assessment and adjustment of the financial provision. The review of the adequacy of the financial provision including the proof of payment must be independently audited (annually) and included in the audit of the EMPR as required by the EIA regulations.

Please refer to Part A, Section 21 for the financial provisioning calculation.

7.2. Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under the Regulation.

Considering the relatively limited impact of the proposed prospecting activities, the closure objectives are aimed at re-instating the landform, land use and vegetation units to the same as before prospecting operations take place unless a specific, reasonable alternate land use is requested by the landowner. As such, the intended end use for the disturbed prospecting areas and the closure objectives will be defined in consultation with the relevant landowner. Proof of such consultation will be submitted together with the Application for Closure Certificate. The overall aim of the rehabilitation plan is to rehabilitate the environment to a condition as close as possible to that which existed prior to prospecting. This shall be achieved with a number of specific objectives.

- i. **Making the area safe.** i.e., Decommission prospecting activities so as to ensure that the environment is safe for people and animals. This entails refilling excavations, sealing boreholes, etc.
- ii. **Recreating a free draining landform.** This entails earthworks infilling, reshaping, levelling, etc. to recreate as close as possible the original topography and to ensure a free draining landscape.
- iii. **Re-vegetation.** This involves either reseeded or allowing natural succession depending on the area, climate etc.



- iv. **Storm water management and erosion control.** Management of stormwater and prevention of erosion during rehabilitation. E.g., cut off drains, berms etc. and erosion control where required.
- v. **Verification of rehabilitation success.** Entails monitoring of rehabilitation.
- vi. **Successful closure.** Obtain closure certificate.

8. CONFIRM SPECIFICALLY THAT THE ENVIRONMENTAL OBJECTIVES IN RELATION TO CLOSURE HAVE BEEN CONSULTED WITH LANDOWNER AND INTERESTED AND AFFECTED PARTIES.

The environmental objectives in relation to closure will be consulted with the farmers and affected parties. It will be explained that should the prospecting yield negative results, then the end use for area will revert to its pre-prospecting land use (minutes to be incorporated on the final report). The end-use of the area will therefore not be changed by the prospecting operations.

As such, the purpose of the PPP and stakeholder engagement process is to:

- Introduce the proposed project;
- Explain the environmental authorisations required;
- Explain the environmental studies already completed and yet to be undertaken (where applicable);
- Determine and record issues, concerns, suggestions, and objections to the project;
- Provide opportunity for input and gathering of local knowledge;
- Establish and formalise lines of communication between the I&AP's and the project team;
- Identify all significant issues for the project; and
- Identify possible mitigation measures or environmental management plans to minimise and/or prevent negative environmental impacts and maximize and/or promote positive environmental impacts associated with the project.

9. PROVIDE A REHABILITATION PLAN THAT DESCRIBES AND SHOWS THE SCALE AND AERIAL EXTENT OF THE MAIN PROSPECTING ACTIVITIES, INCLUDING THE ANTICIPATED PROSPECTING AREA AT THE TIME OF CLOSURE.

The following main strategies will be implemented:

- Rehabilitation of areas disturbed as a consequence of prospecting to a land capability that will support and sustain a predetermined post-closure land use or the current land use by the operational mining company as the sites are located on residue deposits/ stockpiles;
- Removal of all infrastructure/equipment that cannot be beneficially re-used, as per agreements established, and returning the associated disturbed land to the planned final land use or the current land use by the operational mining company as the sites are located on residue deposits/ stockpiles;
- Removal of existing contaminated material from affected areas;
- Establishment of final landforms that are stable and safe in the long run or the current land use by the operational mining company as the sites are located on residue deposits/ stockpiles;
- Establishment and implementation of measures that meet specific closure related performance objectives.

9.1. Integrated rehabilitation and closure plan

The main aim in developing this rehabilitation plan is to mitigate the impacts caused by the prospecting activities and to restore land back to a satisfactory standard as agreed with the operational mine. It is best practice to develop the rehabilitation plan as early as possible so as to ensure the optimal management of rehabilitation issues that may arise. It is important that the project's closure plan is defined and understood from before starting the process and is complementary to the rehabilitation goals. Rehabilitation and closure objectives need to be tailored to the project at hand and be aligned with the EMPR. The overall rehabilitation objectives for this project are as follows:

- Maintain and minimise impacts to the ecosystem within the prospecting area;
- Re-establishment of the pre-developed land capability to allow for a suitable post-prospecting land use;
- Prevent soil, surface water and groundwater contamination;
- Comply with the relevant local and national regulatory requirements; and



- Maintain and monitor the rehabilitated areas.

Successful rehabilitation must be sustainable, and requires an understanding of the basic baseline environment, as well as project management to ensure that the rehabilitation program is a success.

It is noted that a separate application for environmental authorisation must be submitted for closure in accordance with EIA Regulations, 2014 Listing Notice 1 Activity 22:

The decommissioning of any activity requiring

- i. A closure certificate in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); or
- ii. A prospecting right, mining permit, production right or exploration right, where the throughput of the activity has reduced by 90% or more over a period of 5 years excluding where the competent authority has in writing agreed that such reduction in throughput does not constitute closure.

9.2. Phase 1: Making safe

The areas disturbed by the surface sampling from the residue deposits / stockpiles will be made safe by ensuring that there are no pits / holes that could pose a danger to people walking on top of these or to machinery traversing the stockpiles as part of the daily operations of the operating mine.

Should drilling be done in future (and after approval is received from the DMR in terms of NEMA requirements), rehabilitations of the boreholes will take place in line with the DWAF (2008) Best Practice Guideline A6: Water Management for Underground Mines: all prospecting boreholes that will not be required for later monitoring or other useful purposes should be plugged and sealed with cement to prevent possible cross flow and contamination between aquifers. Cement and liquid concrete are hazardous to the natural environment on account of the very high pH of the material, and the chemicals contained therein. As a result, the contractor shall ensure that:

- Concrete shall not be mixed directly on the ground;
- The visible remains of concrete, either solid, or from washings, shall be physically removed immediately and disposed of as waste, (Washing of visible signs into the ground is not acceptable); and
- All excess aggregate shall also be removed.

9.3. Phase 2: Landform design, erosion control and revegetation

For the surface sampling phase landform design rehabilitation will be done to the satisfaction of the site manager of the operational mine to ensure safety of people / machinery and equipment. As the proposed sites are operational mines erosion control will be addressed by making the sampling sites safe, no rehabilitation will take place unless it is an old defunct stockpile / deposit.

For the potential drilling phase (after approval has been sourced and received), landform, erosion control and re-vegetation is an important part of the rehabilitation process. Landform and land use are closely interrelated, and the landform should be returned as closely as possible to the original landform or as agreed with the operational mine. Community expectations, compatibility with local land use practices and regional infrastructure, or the need to replace natural ecosystems and faunal habitats all support returning the land as closely as possible to its original appearance and productive capacity. This requires the following:

- Shape, level and de-compact the final landscape after removing all the project infrastructure (if any), dress with topsoil and, where necessary, vegetate with indigenous species. Commission specialists to assist in planning re-vegetation and the management of environmental impact, as required.
- Remove access roads (if any) with no beneficial re-use potential by deep ripping, shaping and levelling after the removal and disposal of any culverts, drains, ditches and/or other infrastructure. Natural drainage patterns are to be reinstated as closely as possible.
- Shape all channels and drains to smooth slopes and integrate into the natural drainage pattern.
- Construct contour banks and energy dissipating structures as necessary to protect disturbed areas from erosion prior to stabilisation.
- Promote re-vegetation through the encouragement of the natural process of secondary succession.



- Natural re-vegetation is dependent on de-compaction of subsoils and adequate replacement of the accumulated reserves of topsoil (for example, over the sampling sites), so as to encourage the establishment of pioneer vegetation.
- Remove alien and/or exotic vegetation.
- Undertake a seeding programme only where necessary, and as agreed with the re-vegetation specialist

9.4. Phase 3: Monitoring and maintenance

As the surface sites are residue deposits / stockpiles it will be difficult to show that rehabilitation was done if the stockpile / deposit is in an operational phase due to continued depositing by the operational mine on the stockpiles / deposits. It is this proposed that immediately after taking the samples that photographic evidence of the sampling site be taken to show that it is safe and does not pose a danger to human / machinery / equipment. If the sampling site was an old defunct deposit / stockpile area, vegetation establishment will need to be monitored one year post sampling.

For the potential drilling phase (after approval has been sourced and received), the post-operational monitoring and management period following decommissioning of prospecting activities must be implemented by a suitable qualified independent party for a minimum of one (1) year unless otherwise specified by the competent authority. The monitoring activities during this period will include but not be limited to:

- Biodiversity monitoring; and
- Re-vegetation of disturbed areas where required.

Provision must be made to monitor any unforeseen impact that may arise as a result of the proposed prospecting activities and incorporated into post closure monitoring and management.

9.5. Post-closure monitoring and maintenance

For the surface sampling phase as applicable to this report no monitoring will be done on active operational residue stockpiles / deposits. If sampling was done on old defunct deposit / stockpile area, vegetation establishment will need to be monitored one year post sampling.

For the potential drilling phase (after approval has been sourced and received), prior to decommissioning and rehabilitation activities, a monitoring programme shall be developed and submitted to the relevant authority for approval, as a part of the Final Rehabilitation Plan. It is recommended that the post-closure monitoring include the following:

- Confirmation that any waste, wastewater or other pollutants that is generated as a result of decommissioning will be managed appropriately, as per the detailed requirements set out in the Final Rehabilitation Plan,
- Confirmation that all de-contaminated sites are free of residual pollution after decommissioning.
- Confirmation that acceptable cover has been achieved in areas where natural vegetation is being re-established. 'Acceptable cover' means re-establishment of pioneer grass communities over the disturbed areas at a density similar to surrounding undisturbed areas, non-eroding and free of invasive alien plants.

Annual environmental reports will be submitted to the Competent Authority and other relevant Departments for at least one-year post-decommissioning. The frequency and duration of this reporting period may be increased to include longer term monitoring, at intervals to be agreed with the Designated Authority. The monitoring reports shall include a list of any remedial action necessary to ensure that infrastructure that has not been removed remains safe and pollution free and that rehabilitation of project sites are in a stable, weed and free condition.

9.6. Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.

The rehabilitation plan is compatible with the closure objectives in that it seeks to ensure that negative impacts on the receiving environment that could not be prevented or mitigated during prospecting are



rehabilitated. The appropriate disposal of waste will ensure that land is usable, in alignment with surrounding land uses and that no hazardous materials are left on site post-prospecting.

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

Operational rehabilitation has been catered for in the Budget lodged with the application in the Prospecting Work Programme. In terms of decommissioning rehabilitation (or the so-called Rehabilitation Quantum the calculation of the preliminary estimate of the rehabilitation cost is outlined in Part A, Section 21.

9.7. Confirm that the financial provision will be provided as determined.

The Budget has been prepared by the applicant as part of the Prospecting Work Programme and that includes a provision for Rehabilitation in the prospecting budget. The applicant confirms herewith that the amount (as requested by the DMRE) can be (and will be) provided from operating expenditure. The quantum must be approved by the DMR after which the applicant will provide for the quantum by way of bank guarantee.



10.MECHANISMS FOR MONITORING COMPLIANCE WITH AND PERFORMANCE ASSESSMENT AGAINST THE ENVIRONMENTAL MANAGEMENT PROGRAMME AND REPORTING THEREON, INCLUDING

- a) Monitoring of Impact Management Actions
- b) Monitoring and reporting frequency
- c) Responsible persons
- d) Time period for implementing impact management actions
- e) Mechanism for monitoring compliance

Table 10-1: Mechanisms for monitoring compliance

Source activity monitoring and reporting	Impacts requiring monitoring programmes	Functional requirements for monitoring	Roles and responsibilities	Frequency and time periods for implementing impact management actions
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Temporary disturbance of wildlife due to increased human presence and possible use of machinery and/or vehicles	N/A	N/A	N/A
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Destruction of and fragmentation of portions of vegetation community (note that most of the sampling activities (12 sites) will take place on previously disturbed areas)	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Loss of CBA1 and ESA and other sections of area classed as other natural Areas	Vegetation species removed	Application, Contractor, Specialists	Before sampling commence
N/A	Displacement of Faunal community due to temporary habitat loss, disturbance (noise, dust, and vibration) and/or direct mortalities	N/A	N/A	N/A
N/A	Continued disturbance of wildlife due to increased human	N/A	N/A	N/A



Source activity monitoring and reporting	Impacts requiring monitoring programmes	Functional requirements for monitoring	Roles and responsibilities	Frequency and time periods for implementing impact management actions
	presence and possible use of machinery and/or vehicles			
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Encroachment by alien invasive plant species	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	Fauna species	Application, Contractor, Specialists	Before sampling commence
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Disturbance and mortalities of reptiles and other herpetofauna due to rock and soil sampling	See above	See above	See above
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	See above	See above	See above
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Ongoing displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbance because of sampling.	See above	See above	See above
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Further impacts due to the spread and/or establishment of alien and/or invasive species	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place
Site clearance (if needed) to allow for collection of 10 samples in a 500 m radius	Further impacts due to the spread and/or establishment of alien and/or invasive species	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Displacement, direct mortalities and disturbance of faunal community due to habitat loss and disturbances such as dust, vibrations poaching and noise.	See above	See above	See above
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Degradation of aquifers	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling



Source activity monitoring and reporting	Impacts requiring monitoring programmes	Functional requirements for monitoring	Roles and responsibilities	Frequency and time periods for implementing impact management actions
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts of existing groundwater users	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on potential burial grounds and graves	Presence at sampling site	Application, Contractor, Specialists	As needed
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Impacts on archaeological resources	Presence at sampling site	Application, Contractor, Specialists	As needed
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Noise nuisance	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Pollution of soil	Identification of spills and removal of contaminated soils and disposal to suitable waste landfill site	Application, Contractor, Specialists	As needed
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Air Quality	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Deterioration and damage to existing access roads and tracks	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential job creation	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Safety and security to existing landowners and lawful occupier	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Interference with existing land uses	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling



Source activity monitoring and reporting	Impacts requiring monitoring programmes	Functional requirements for monitoring	Roles and responsibilities	Frequency and time periods for implementing impact management actions
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Generation and disposal of waste	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Erosion due to improper rehabilitation	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential soil pollution from hydrocarbons spills from vehicles used to access the site	Identification of spills and removal of contaminated soils and disposal to suitable waste landfill site	Application, Contractor, Specialists	As needed
Site access to the proposed sampling site	Potential impact on the disposal of waste on the sampling area by the operational mining company	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential impact on the disposal of waste on the sampling area by the operational mining company	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Site access to the proposed sampling site	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Collection of surface samples from 10 points in a radius of 500 m for each of the 12 sites	Potential overlap with existing ESKOM / other solar companies infrastructure or future planned expansion.	Not identified for surface sampling	Not identified for surface sampling	Not identified for surface sampling
Rehabilitation of disturbed sites	Rehabilitation of sampling area to predetermined land use	Vegetation establishment	Application, Contractor, Specialists	1 year after sampling took place



11. INDICATE THE FREQUENCY OF THE SUBMISSION OF THE PERFORMANCE ASSESSMENT/ ENVIRONMENTAL AUDIT REPORT.

Regular monitoring of all the environmental management procedures and mitigation measures shall be carried out by Salene in order to ensure that the provisions of this EMP are adhered to. Formal monitoring and performance assessment of the EMP will be undertaken on an annual basis.

12. ENVIRONMENTAL AWARENESS PLAN

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

The following Environmental Awareness Training will be implemented by Salene Manganese in order to inform employees and contractors of the environmental risk that may result from their work, or the risk of their interaction with the sensitive environment. The training will be conducted as part of the induction process for all new employees (including contractors) that will perform work in terms of the proposed activities. Proof of all training provided must be kept on-site. The Environmental Awareness Training will, as a minimum cover the following topics within Table 12-1

Table 12-1: Environmental Awareness Plan

Air Quality	Activities that may result or mitigate impact on air quality; speeding on roads, the requirements for dust suppression, etc. Negative impacts on the receiving environment if mitigation measures are not implemented.
Surface and groundwater	Risks to surface and groundwater, e.g., fuel and chemical handling and further risks of erosion or damage to riparian vegetation. How incidents should be reported, and emergency requirements. The importance to re-use water and to prevent spillages.
Cultural Heritage	To respect all cultures and believes. How to report any sightings of heritage importance as identified during operation activities (e.g., fossils).
Fauna	Overview of the fauna found on/around site and the uniqueness thereof. Mitigation measures that all contractors and employees need to abide by. No contractor or personnel allowed to catch or kill any species, and how any sightings should be reported if further actions are required (e.g., to catch and release).
Flora	Overview of the flora diversity on site, and the rare and endangered nature thereof. Measures taken by the company to protect species. No contractor or personnel allowed to remove, harvest or destroy any flora species unless clearly instructed based on the operational plans.
Waste management	Measures to avoid waste generation and to participate in waste minimisation/reduction.
Traffic strategies.	To stay on designated roads and not create new roads on areas that will not be used for prospecting purposes. To be aware of the fauna species and to be on the lookout and avoid collisions.
Emergency Preparedness and Response	How to report any emergency or incident. Incident and emergency reporting requirements.
General rules and conduct	Respect for the sensitive environment. Do not litter. Respect for each other and for different cultures. Safety and health requirements



12.2. Manner in which risks will be dealt with in order to avoid pollution or the degradation of the environment.

All employees must be provided with environmental awareness training to inform them of any environmental risks which may result from their work and the manner in which the risks must be dealt with in order to avoid pollution or the degradation of the environment. Employees should be provided with environmental awareness training before prospecting operations start. All new employees should be provided with environmental awareness training. Induction courses will be provided to all employees by a reputable trainer.

13. SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

(Among others, confirm that the financial provision will be reviewed annually).

All potential risks have been identified within this document and are to be communicated to all contractors and all contractors and is indicated in the EMPr which will be available to all staff. Environmental training needs for each section should be identified and addressed to ensure environmental management is part of day-to-day operations. The environmental risk responsibilities guide the training requirements of each individual. Environmental training recommended for the different levels of management guide the training needs identification process. This is a minimum guideline and any additional training can be added where section specific issues or high-risk items require training and awareness. It is the responsibility of the line manager to ensure environmental training needs for individual staff members are identified, agreed to, facilitated and tracked.

An environmental audit report will be submitted annually as per DMR requirements.

The financial provision will be updated on an annual basis and submitted to the DMR.

14. UNDERTAKING

The EAP herewith confirms

- a) the correctness of the information provided in the reports
- b) the inclusion of comments and inputs from stakeholders and I&APs ;
- c) the inclusion of inputs and recommendations from the specialist reports where relevant; and
- d) that the information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected. parties are correctly reflected herein.

Signature of the environmental assessment practitioner: Christina Petronella Erasmus

Name of company: Prescali Environmental Consultants (Pty) Ltd

Date: 21 November 2022

-END-



15. REFERENCES

- Baily, A., & Pitman, W. (2015). *Water Resources of South Africa 2012 Study (WR2012)*. WRC Report K5/2143/1. Pretoria: Water Research Commission.
- Climate. (2020, 09 09). *Climate data*. Retrieved from <https://en.climate-data.org/africa/south-africa/north-west/brits-7152/#climate-graph>
- CSIR. (2011). *NFEPA_Wetlands.shp*. Pretoria: South African National Biodiversity Institute.
- DEAT. (1998). *Guideline Document: EIA Regulations, Implementation section 21, 22, and 26 of the Environmental Conservation Act*. Pretoria: Department of Environmental Affairs and Tourism.
- DEAT. (2002). *Impact Significance, Integrated Environmental Management, Information series 5*. Pretoria.
- DWAF. (2004). *National Water Resource Strategy. First Edition*. Pretoria: Department of Water and Sanitation.
- Gamagara, L. M. (2019). *Final Second Review Integrated Development Plan (IDP) Gamagara Local Municipality*. Kathu.
- Meteoblue. (2020, 09 09). *Meteoblue*. Retrieved from https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/brits_south-africa_1015621
- Mucina, L., & Rutherford, M. (2006). *The vegetation of South Africa, Lesotho and Swaziland*. Pretoria: National Biodiversity Institute.
- Nariansamy, M., & Smyth, N. (2021). *Scoping Report for Changes to Surface Infrastructure at the Mokala Mine*. Johannesburg: SRK Consulting SA (Pty) Ltd.
- Red Kite, E. S. (2020). *Terrestrial Ecology Assessment for Salene Manganese (Macarthy)*. Red Kite.
- SES, S. E. (2016). *Environmental Impact Assessment (EIA) and Environmental Management Programme (EMPr) report for the proposed development of the Coza (Jenkins Section) Mine*. Synergistics Environmental Services (Pty) Ltd.
- SLR. (2015). *Scoping Report for the proposed Kolomela Mine expansion Project*. Postmasburg: SLR. Synergistics Environmental Services. (2015). *Appendix H: Groundwater Impact Report*. Kuruman: Synergistics Environmental Services (Pty).
- Thari Resources (Pty) Ltd. (2012). *Environmental Management Plan*. Thari Resources (Pty) Ltd.
- TLM, T. L. (2018). *Integrated Development Plan- Revised 2018/2019 -2019/2020- 2020/2021*. Postmasburg.

16. APPENDICES

Appendix 1: Qualifications of the EAP

Appendix 2: Experience of the EAP

Appendix 3: Locality Map

- Locality map at a scale not smaller than 1:250000
- Proposed location of prospecting areas with 500 m radius

Appendix 4: Final Site map

Appendix 5: Terrestrial biodiversity Flora species list

Appendix 6: Bird species list

Appendix 7: Public Participation Process

Appendix 7. 1: Issues and Response Report

Appendix 7. 2: Site Notices / Background Information Documents / Newspaper Advert

Appendix 7. 3: Proof of consultation:

- IAP list
- IAP Notification (Post / Fax / Email / Hand delivered Notifications)
- Draft Basic Assessment distribution / Open day meeting invitation and confirmation

Appendix 7. 4: Formal letters or Registration as I&AP received

Appendix 7. 5: Meetings (**Minutes, Attendance, Presentation**)

Appendix 8: Eskom Requirements