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## **BASIC IMPACT REPORT & ENVIRONMENTAL** MANAGEMENT PROGRAMME REPORT

FOR THE PROPOSED MINING PERMIT FOR THE MINING OF SAND (QY) INCLUDING ASSOCIATED INFRASTRUCTURE, STRUCTURE AND EARTHWORKS ON A CERTAIN 5HA AREA ON A CERTAIN PORTION OF THE REMAINING EXTENT & PORTION 3 OF THE FARM BUFFELSHOEK 351, REGISTRATION DIVISION: KQ, LIMPOPO PROVINCE.

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#### PROJECT INFORMATION

Basic Assessment for the proposed Mining Permit for the mining of Sand (QY) including

associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion

of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ,

Limpopo Province.

Report Title: BAR & EMPr

Prepared By: Milnex CC

Date: 06/08/2022

#### **QUALITY CONTROL:**

Report Author: Report Reviewer:

Lizanne Esterhuizen

Honours Degree in Environmental Science

Signature:

Name:

**Project Name:** 

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The DEA screening tool was used in compiling this document

#### **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 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.

#### **BASIC ASSESSMENT REPORT PROCESS**

1) The environmental outcomes, impacts and residual risks of the proposed activity must be set out in the basic assessment report.

#### **OBJECTIVE OF THE BASIC ASSESSMENT PROCESS**

- 2) 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 [the] 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 avoided, managed or mitigated; and
  - 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 avoid, manage or mitigate identified impacts; and
    - iii) identify residual risks that need to be managed and monitored.

#### SCOPING OF ASSESSMENT AND CONTENT OF BASIC ASSESSMENT REPORT

1) Contact Person and correspondence address

#### A) DETAILS OF:

- i) THE EAP WHO PREPARED THE REPORT
- ii) EXPERTISE OF THE EAP

NAME OF PRACTITIONER	QUALIFICATIONS	CONTACT DETAILS
Lizanne Esterhuizen	Honours Degree in Environmental Science (refer to <b>Appendix 1</b> )	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: lizanne@milnex-sa.co.za

#### Summary of the EAP's past experience. (Attach the EAP's curriculum vitae as Appendix 2)

Milnex CC was contracted by Impulse Mining (Pty) Ltd as the independent environmental consultant to undertake the BAR and EMPr process for the proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province. The property is located approximately 10km South from town of Thabazimbi in the Limpopo province.

Milnex CC does not have any interest in secondary developments that may arise out of the authorisation of the proposed project.

Milnex CC is a specialist environmental consultancy with extensive experience in the mining industry which provides a holistic environmental management service, including environmental assessment and planning to ensure compliance with relevant environmental legislation. Milnex CC benefits from the pooled resources, diverse skills and experience in the environmental and mining field held by its team that has been actively involved in undertaking environmental studies for a wide variety of mining related projects throughout South Africa. The Milnex CC team has considerable experience in environmental impact assessment and environmental management, especially in the mining industry.

Milnex CC have experience consulting in the environmental field. Their key focus is on environmental assessment, advice and management and ensuring compliance to legislation and guidelines. They are currently involved in undertaking EIAs for several projects across the country (refer to **Appendix 2** for CV)

#### B) DESCRIPTION OF THE PROPERTY.

Farm Name:	A certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351	
Application area (Ha)	5 hectares	
Magisterial district:	Thabazimbi Local Municipality Waterberg District Municipality	
Registration Division	KQ	
Distance and direction from nearest town	The property is located approximately 10km South from town of Thabazimbi in the Limpopo province	
21 digit Surveyor General Code for each farm portion	1) T0KQ0000000035100000 2) T0KQ0000000035100003	
Minerals applied for	Sand (QY)	

#### **III. FARM CO-ORDINATES**

FARM	LONGITUDE	LATITUDE
	27° 23' 3,752"" E	24° 39' 55,168"" S
	27° 23' 6,086"" E	24° 39' 54,894"" S
	27° 23' 7,688"" E	24° 39' 54,706"" S
	27° 23' 8,358"" E	24° 39' 54,581"" S
	27° 23' 9,028"" E	24° 39' 54,456"" S
	27° 23' 10,793"" E	24° 39' 54,125"" S
	27° 23' 15,397"" E	24° 39' 53,243"" S
	27° 23' 18,132"" E	24° 39' 52,723"" S
A certain 5ha area on a certain portion of the Remaining Extent	27° 23' 20,520"" E	24° 39' 52,281"" S
& Portion 3 of the farm Buffelshoek 351	27° 23' 22,474"" E	24° 39' 51,920"" S
	27° 2 <mark>3' 22,</mark> 976"" E	24° 39' 51,827"" S
	27° 23' 23,477"" E	24° 39' 51,734"" S
	27° 23' 25,564"" E	24° 39' 51,284"" S
	27° 23' 25,815"" E	24° 39' 51,229"" S
	27° 23' 26,067"" E	24° 39' 51,175"" S
	27° 23' 27,516"" E	24° 39' 50,874"" S
	27° 23' 28,256"" E	24° 39' 53,445"" S
	27° 23' 2,868"" E	24° 39' 57,558"" S

C) LOCALITY MAP (show nearest town, scale not smaller than 1:250000 attached as Appendix 3).

A Locality map is attached in Appendix 3 and on figure 1 below.

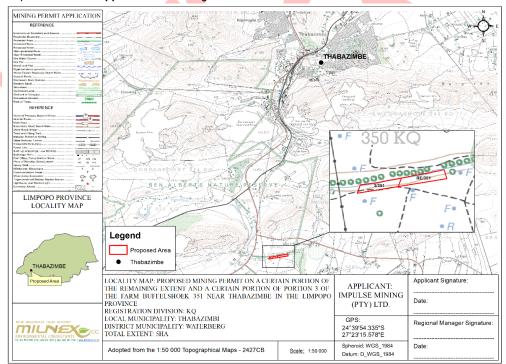


Figure 1: Locality Map

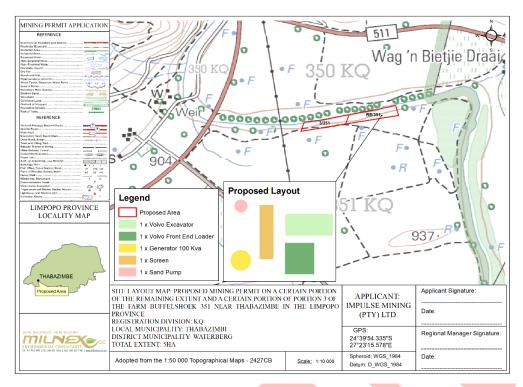


Figure 2: Site Plan Map

#### D) DESCRIPTION OF THE SCOPE OF THE PROPOSED OVERALL ACTIVITY.

#### i) LISTED AND SPECIFIED ACTIVITIES

Description of the overall activity.
(Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaissance permit, Technical co-operation permit, Additional listed activity)

- Listing Notice 1, (GNR 327), Activity 19: The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;
- 2. Listing Notice 1 (GNR 327) as amended (GNR 517), Activity 21: "Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice on in Listing Notice 3 of 2014, required to exercise the mining permit"
- 3. **Listing Notice 1 (GNR 327), Activity 27:** "The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation."
- Listing Notice 3 GNR 324, Activity 12: The clearance of an area of 300 square metres or more of indigenous vegetation; (e) Limpopo (ii) Within critical biodiversity areas identified in systematic biodiversity plans adopted by the competent authority
- 5. Listing Notice 3 GNR 324, Activity 14: The development of infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs (a) within a watercourse (c) if no development setback has been adopted, within 32metres of a watercourse (e) Limpopo (i) Outside urban areas: (ff) Critical Biodiversity areas (hh) Areas within 10 kilometres from a protected areas identified in terms of NEMPAA.

Mining Permit for the mining of **Sand (QY)** including associated infrastructure, structure and earthworks.

(E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etcetc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etcetc)	Aerial extent of the Activity Ha or m <sup>2</sup>	LISTED ACTIVITY  (Mark with an X where applicable or affected).	APPLICABLE LISTING NOTICE (GNR 544, GNR 545 or GNR 546)	WASTE MANAGEMENT AUTHORISATION  (Indicate whether an authorisation is required in terms of the Waste Management Act).  (Mark with an X)
Mining Permit:  Listing Notice 1, (GNR 327), Activity 19: The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;	The application area is 5ha	X	Listing Notice 1, (GNR 327), Activity 19:	
Mining permit:  Listing Notice 1 (GNR 327) as amended (GNR 517), Activity 21: "Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice on in Listing Notice 3 of 2014, required to exercise the mining permit"	The application area is 5ha	X	Listing Notice 1 (GNR 327) as amended (GNR 517), Activity 21	-
Clearance of indigenous vegetation:  Listing Notice 1 (GNR 327), Activity 27: "The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation."	The application area is 4. 8068ha	X	Listing Notice 1 (GNR 327), Activity 27	-
Clearance of indigenous vegetation:  Listing Notice 3 GNR 324, Activity 12: The clearance of an area of 300 square metres or more of indigenous vegetation; (e) Limpopo (ii) Within critical biodiversity areas identified in systematic biodiversity plans adopted by the competent authority		X	Listing Notice 3 GNR 324, Activity 12:	

Mining permit:			
Listing Notice 3 GNR 324, Activity 14: The development of infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs (a) within a watercourse (c) if no development setback has been adopted, within 32metres of a watercourse (e) Limpopo (i) Outside urban areas: (ff) Critical Biodiversity areas (hh) Areas within 10 kilometres from a protected areas identified in terms of NEMPAA.	X	Listing Notice 3 GNR 324, Activity 14:	



#### ii) DESCRIPTION OF THE ASSOCIATED STRUCTURES AND INFRASTRUCTURE RELATED TO THE DEVELOPMENT

(Describe Methodology or technology to be employed, and for a linear activity, a description of the route of the activity

**Impulse Mining (Pty) Ltd** has embarked on a process for applying for proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

The area is preferred due to the sites expected mineral resources. **Impulse Mining (Pty) Ltd** requires a mining permit in terms of NEMA and the Mineral and Petroleum Resources Development Act to mine for minerals mentioned above within the Thabazimbi Local Municipality, Limpopo Province (refer to a locality map attached in **Appendix 3**).

#### Access roads

Access will be obtained from gravel and tar roads off the R510 and R511 roads.

#### Water Supply

Additional water requirements related to the portable water supply for employees and workers will be supplied.

#### Ablution

Chemical toilets shall be used, no french drains and pits shall be permitted.

#### Storage of dangerous goods

During mining activities, limited quantities of diesel and fuel, oil and lubricants if any will be stored on site. These goods should be placed in a bunded area one and a half times the volume of the total amount of goods to be stored.

Types of lubricants should be dependent on the machines used, this will include diesel, fuel and oil. It should be noted that no more than 30 000 cubes metres of diesel may be stored on site.

#### **Dust suppression**

Unacceptable levels of dust fallout can be determined by implementing dust management by monitoring compliance with the requirements of the National Dust Control Regulations for an activity, in terms of nuisance or disturbance.

The National Framework for Air Quality Management in the Republic of South Africa (the National Framework), as published under Government Notice No. 1144 of 26 October 2018, underpins NEM:AQA by providing national norms and standards for air quality management to ensure compliance with legislation. The National Framework serves as the country's AQMP.

Section 32 of the NEM:AQA makes provision for the Minister or the MEC to prescribe measures for the control of dust in specific places or areas, or by specified machinery or in specific instances. While dust generally does not pose a health risk, it may be regarded as a nuisance. It is the responsibility of the owner of the dust generating activity to take reasonable measures to limit the nuisance factor.

With respect to this, the Minister has published in the gazette the regulations for the control of dust in 2013 (Notice 827, Government Gazette No. 36974). These regulations provide requirements for measures for the control of dust, which includes the requirements for monitoring, dust management plan development and implementation and reporting.

According to dust levels set out by the National Dust Control Regulations 2013 (GNR. 827). The limits have the following threshold Section 3. Dustfall standard

Table 1. Acceptable dust fall rates

Restriction Areas	Dustfall rate (D) (mg/m²/day, 30-day average)	Permitted frequency of exceeding dust fall rate
Residential Area	D < 600	Two within a year, not sequential months
Non-residential Area	600 < D < 1200	Two within a year, not sequential months

(i) **DESCRIPTION OF PLANNED INVASIVE ACTIVITIES:** (These activities do not disturb the land where prospecting/mining will take place e.g. aerial photography, desktop studies, aeromagnetic surveys, etc.).

#### The sand mining methodology:

A floating barge, with a pump mounted on top, is used to pump the sand from the river bottom. Flexible floating pipes are connected to the pump, in order to transfer the sand from the river to the small "settling pond". The entrance to the pond is equipped with a sieve to ensure that only the fine sand enters the pond. The pond is also equipped with two water outflow pipes that ensures that the water flows back into the river, as soon as the sand has settled/deposited.

After the excess water has drained/flowed back into the river, the sand is removed from the settling pond and stockpiled at the demarcated stockpiling area. Here at the stockpiling area the sand will be left to dry. After the sand has dried, the sand is loaded and transported to the relevant client.

It should be kept in mind that the only disturbance to the riverbank is that disturbance caused by the small settling pond and the entry point to the river. There will only be two entry points and two settling ponds throughout the duration of the permit but, only one of each are in use while the other is being rehabilitated. Only one truck at a time is allowed to enter the area in order to minimize the possible generation of dust and to ensure that the trucks keep within the demarcated areas.

The above mentioned pump extracts approximately 700 cubic meters per hour. The 700 cubic meters consists of 210 cubic meters of sand per hour and 490 cubic meters of water per hour, but more than 466 (95%) cubic meters of water flows back into the river through the outflow pipes.

#### For backfilling and rehabilitation, the following procedures will be as follow:

- All infrastructures will be demolished and removed from the mining area.
- All stockpiled sand will be removed from the mining site.
- The access road will be used for farming purposes by the surface owner.
- The mined area within the riverbed will be levelled.
- The surface of the stockpile area will be ripped and seeded with a seed mix of the surrounding area.
- (ii) **DESCRIPTION OF PRE-FEASIBILITY STUDIES** (Activities in this section includes but are not limited to: initial, geological modelling, resource determination, possible future funding models, etc.)

All data will be consolidated and processed to determine the diamond bearing resource on the property.

#### E) POLICY AND LEGISLATIVE CONTEXT

Title of legislation, policy or guideline:	Administering authority:	Promulgation Date:
National Environmental Management Act No. 107 of 1998 as amended.	Department of Environmental Affairs	27 November 1998
Constitution of South Africa Act 108 of 1996	National	18 December 1996
The National Heritage Resources Act (Act No. 25 of 1999)	SAHRA	1999

		T
Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	Department of Mineral Resources & Energy (DMRE)	2002
Mineral and Petroleum Resources Development Regulations, 2014.	Department of Mineral Resources & Energy (DMRE)	
National Infrastructure Plan	National	
National Environmental Management: Biodiversity Act No. 10 of 2004	Department of Environmental Affairs	7 June 2004
National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)	National & Provincial	1 July 2009
National Environmental Management: Waste Act, 2008 (Act No. 59 Of 2008). Regulations regarding the Planning & Management of Residue Stockpiles & Residue Deposits from a Prospecting, Mining, Exploration or Production Operation		
EIA regulations under NEMA	Department of Environmental Affairs	14 December 2014
Conservation of Agricultural Resources Act,1983 (Act No. 43 of 1983)	Department of Agriculture Forestry and Fisheries	1 June 1984
National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004).	National and Provincial	11 September 2004
National Water Act, 1998 (Act No. 36 of 1998).	National	20 August 1998
National Forest Act (Act 84 of 1998) (NFA)	National	30 October 1998
National Veld & Forest Fires Act (Act 101 of 1998)	National	27 November 1998
National Environmental Management: Protected Areas Act 57 of 2003		
Hazardous Substances Act (No. 15 of 1979)		
Subdivision of Agricultural Land Act (No. 70 of 1970)		
Occupational Health and Safety Act (No. 85 of 1993)		
Mine Health and Safety Act (No. 29 of 1996)		
Government Notice Regulation 704 of 1999		
Waterberg District Municipality Integrated Development Plan (IDP)	Municipal	
Thabazimbi Local Municipality Integrated Development Plan (IDP)	Municipal	
Waterberg District Environmental Management Framework Report		

#### POLICY AND LEGISLATIVE CONTEXT

Title of legislation, policy or guideline:	Reference where applied	How does this development comply with and respond to the legislation and policy context.
Constitution of South Africa Act 108 of 1996	Section 24	The Constitution is the supreme law of the Republic and all law and conduct must be consistent with the Constitution. The Chapter on the Bill of Rights contains a number of provisions, which are relevant to securing the protection of the environment. Section 24 of the Constitution of the Republic of South Africa (Act 108 of 1996) states the following:  "Everyone has the right —  (a) to an environment that is not harmful to their health or well-being; and  (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that —  i) prevent pollution and ecological degradation;  ii) promote conservation; and  iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development."  The Constitution therefore, compels government to give effect to the people's environmental right and places government under a legal duty to act as a responsible custodian of the countries environment. It compels government to pass legislation and use other measures to protect the environment, to prevent pollution and ecological degradation, promote conservation and secure sustainable development.
National Environmental Management Act No. 107 of 1998 as amended.	S24(1) of NEMA S28(1) of NEMA	NEMA provides for co-operative governance by establishing principles and procedures for decision-makers on matters affecting the environment. An important function of the Act is to serve as an enabling Act for the promulgation of legislation to effectively address integrated environmental management. Some of the principles in the Act are accountability; affordability; cradle to grave management; equity; integration; open information; polluter pays; subsidiary; waste avoidance and minimisation; co-operative governance; sustainable development; and environmental protection and justice.  The mandate for EIA lays with the National Environmental Management Act (107 of 1998) and the EIA Regulations No. 326, 327, 325, and 324 promulgated in terms of Section 24 of NEMA. The EIA Regulations determine that an Environmental Authorisation is required for certain listed activities, which might have a detrimental effect on the environment.
EIA regulations as amended under NEMA	Listing notice 1 Listing notice 2 Listing Notice 3	The National Environmental Management Act107 of 1998 (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment. These activities are detailed in Listing Notice 1 (as amended by GNR 327 of 7 April 2017), Listing Notice 2 (as amended by GNR325 of 7 April 2017) and Listing Notice 3 (as amended by GNR324 of 7 April 2017). Undertaking activities specified in the Listing Notices are only allowed once Environmental Authorisation has been obtained from the competent authority. Such Environmental Authorisation will only be considered once there has been compliance with the EIA Regulations, 2014. The Environmental Authorisation which may be granted subject to conditions.
Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	Section 10, 16, 22, 27 and 48	The Minerals and Petroleum Resources Development Act identifies the state as the official custodian of South Africa's Mineral and Petroleum Resources. Therefore, all activities relating to the reconnaissance, prospecting rights, mining rights, mining permits and retention permits are regulated by the State. One of the objectives of the Act is to 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.

Mineral and Petroleum Resources Development Regulations, 2014.	Regulations 3, 5, 10 and 14	MPRDA Regulations prescribe how an application for a permit or right must be lodged.	
The National Heritage Resources Act (Act No. 25 of 1999)	Section 35 Section 38	The National Heritage Resources Act (Act No 25 of 1999, Section 35) protects South Africa's unique and non-renewable archaeological and palaeontological heritage sites. These sites may not be disturbed without a permit from the relevant heritage resources authority. Section 38 of the NHRA provides guidelines for Cultural Resources Management and proposed developments:	
National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)	Category A Category B Category C	Section 24S of NEMA deals with the management of residue stockpiles and residue deposits and provides that Residue stockpiles and residue deposits must be deposited and managed in accordance with the provisions of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), on any site demarcated for that purpose in the environmental management plan or environmental management programme in question.  The management of residue stockpiles and residue deposits must be done in accordance with any conditions set out and any identified measures in the environmental authorisation issued in terms of NEMA, an environmental management programme and a waste management licence issued in terms of NEMA (Regulation 3(2)).  The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM:WA) regulates waste management in all aspects and created a list of waste management activities that have, or are likely to have, a detrimental effect on the environment, which requires an impact assessment and licensing process. Activities listed in Category A require a Basic Assessment process, activities listed in Category B require a Scoping and EIA process and activities under Category C must comply with the relevant requirements or standards, in order for competent authorities to consider an application in terms of NEM:WA.	
National Environmental Management: Biodiversity Act No. 10 of 2004	Chapter 4 Chapter 5	The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) is part of a suite of legislation falling under NEMA. The Act provides for the management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act, 1998; the protection of species and ecosystems that warrant protection; 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 (SANBI).  Chapter 4 of NEMBA deals with threatened and protected ecosystems and species to ensure the maintenance of their ecological integrity, their survival in the wild, the utilisation of biodiversity is managed in an ecologically sustainable way and to regulate international trade in specimens of endangered species. Chapter 5 of NEMA deals with species and organisms posing potential threats to biodiversity. The purpose of this chapter is to prevent the introduction and spread of alien species and invasive species, also to manage, control and eradicate alien species and invasive species	

National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004).	Section 21	The object of this Act is to protect the environment by providing reasonable measures for the protection and enhancement of the quality of air in the Republic; the prevention of air pollution and ecological degradation; and securing ecologically sustainable development while promoting justifiable economic and social development.  Regulations No. R248 (of 31 March 2010) promulgated in terms of Section 21(1) (a) of the National Environmental Management Act: Air Quality Act (39 of 2004) determine that an Atmospheric Emission License (AEL) is required for certain listed activities, which result in atmospheric emissions which have or may have a detrimental effect on the environment. The Regulation also sets out the minimum emission standards for the listed activities. It is not envisaged that an Atmospheric Emission License will be required for the proposed development.
National Water Act, 1998 (Act No. 36 of 1998).	Section 21	Sustainability and equity are identified as central guiding principles in the protection, use, development, conservation, management and control of water resources. The intention of the Act is to promote the equitable access to water and the sustainable use of water, redress past racial and gender discrimination, and facilitate economic and social development. The Act provides the rights of access to basic water supply and sanitation, and environmentally, it provides for the protection of aquatic and associated ecosystems, the reduction and prevention of pollution and degradation of water resources.  As this Act is founded on the principle that National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest, a person can only be entitled to use water if the use is permissible under the Act. Chapter 4 of the Act lays the basis for regulating water use.
National Forest Act (Act 84 of 1998) (NFA)	Regulation 7	The protection, sustainable management and use of forests and trees within South Africa are provided for under the National Forests Act (Act 84 of 1998).  Regulation 7 from the Act states the following:  Prohibition on destruction of trees in natural forests.  (1) No person may -  (a) cut, disturb, damage or destroy any indigenous tree in a natural forest; or  (b) possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any tree, or any forest product derived from a tree contemplated in paragraph (a), except in terms of  (i) a licence issued under subsection (4) or section 23; or  (ii) an exemption from the provisions of this subsection published by the Minister in the Gazette on the advice of the Council.
National Veld & Forest Fires Act (Act 101 of 1998)	Regulation 13 Chapter 5	The purpose of the Act is to prevent and combat veld, forest and mountain fires throughout the Republic and provides for a variety of institutions, methods and practices for achieving the purpose. Regulations 13 provides the requirement for firebreaks. Chapter 5 places a duty on all owners to acquire equipment and have available personnel to fight fires.

Conservation of Agricultural Resources Act (Act No. 85 of 1983)	The purpose of the Act is to provide for control over the utilization of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants; and for matters connected therewith.  The objects of this Act are to provide for the conservation of the natural agricultural resources of the Republic by the maintenance of the production potential of land, by the combating and prevention of erosion and weakening or destruction of the water sources, and by the protection of the vegetation and the combating of weeds and invader plants.
National Infrastructure Plan	The National Government adopted a National Infrastructure Plan in 2012. With the plan they aim to transform the South African economic landscape while simultaneously creating significant numbers of new jobs, and strengthening the delivery of basic services.  Government will over the three years from 2013/14 invest R827 billion in building and upgrading existing infrastructure.  These investments will improve access by South Africans to healthcare facilities, schools, water, sanitation, housing and electrification. On the other hand, investments in the construction of ports, roads, railway systems, electricity plants, hospitals, schools and dams will contribute to faster economic growth.  This mining activity will indirectly contribute to the growing of the South African economy by supplying SANRAL with material to build and upgrade road infrastructure.
District Municipality Integrated Development Plan (IDP)	The IDP and SDFs of the relevant municipalities was examined and relevant information was included in the EIA report.
Local Municipality Integrated Development Plan (IDP)	The IDP and SDFs of the relevant municipalities was examined and relevant information was included in the EIA report.
National Environmental Management: Protected Areas Act 57 of 2003	This Act provides for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes. It also seeks to provide for the sustainable utilization of protected areas and to promote participation of local communities in the management of protected areas.
National Environmental Management: Waste Act, 2008 (Act No. 59 Of 2008) Regulations regarding the Planning & Management of Residue Stockpiles & Residue Deposits from a Prospecting, Mining, Exploration or Production Operation	The purpose of these Regulations is to regulate the planning and management of residue stockpiles and residue deposits from a prospecting, mining, exploration or production operation.
Hazardous Substances Act (No. 15 of 1979)	The object of the Act is inter alia to 'provide for the control of substances which may cause injury or ill health to, or death of, human beings by reason of their toxic, corrosive, irritant, strongly sensitising or flammable nature or the generation of pressure thereby in certain circumstances; for the control of electronic products; for the division of such substances or products into groups in relation to the degree of danger; for the prohibition and control of such substances.'

	In terms of the Act, substances are divided into schedules, based on their relative degree of toxicity, and the Act provides for the control of importation, manufacture, sale, use, operation, application, modification, disposal and dumping of substances in each schedule.
Subdivision of Agricultural Land Act (No. 70 of 1970)	This Act regulates the subdivision of agricultural land and its use for purposes other than agriculture. The Directorate of Resource Conservation is responsible for the enforcement thereof. Investigations are done by the Provincial Department in support of the execution of the Act. The Act also deals with aspects associated with rezoning land.
Occupational Health and Safety Act (No. 85 of 1993)	The Occupational Health and Safety Act (No. 85 of 1993) (OHSA) provides a legislative framework for the provision of reasonably healthy and safe conditions in the workplace. It also places extensive legal duties on employees and users of machinery and makes major inroads on employers' and employees' common law rights.  The OHSA is applicable and states that any person involved with construction, upgrades or developments for use at work or on any premises shall ensure as far as reasonably practicable that nothing about the manner in which it is installed, erected or constructed makes it unsafe or creates a risk to health when properly used
Mine Health and Safety Act (No. 29 of 1996)	The Mine Health and Safety Act (No. 29 of 1996) (MHSA) aims to protect and promote the health and safety of employees and persons that may be affected by the activities at a mine and outlines both the rights and responsibilities of an employer, as well as the obligations of employees working thereat.  The following principles are considered applicable to the Proposed Project and are detailed below:  • The primary responsibility for ensuring a health and safe working environment in the mining site is placed on the mine owner. The Act sets out in detail the steps that employers must take to identify, assess records and control health and safety hazards in the mine;  • The right of workers to participate in health and safety decisions, the right to receive health and safety information, the right to training and the right to withdraw from the workplace in face of danger;  • The Act requires the establishment of institutions to promote a culture of health and safety and develop policy, legislation and regulations; and  • The responsibility for enforcing MHSA lies with the Mine Health and Safety Inspectorate. The Inspectorate's powers are recast and include the power to impose administrative fines upon employers who contravene the MHSA.  The Act also contains innovative approaches to the investigation of accidents, diseases and other occurrences that threaten health and safety.
Government Notice Regulation 704 of 1999	GNR.704 of 1999 under the NWA provides regulations on the use of water for mining and related activities aimed at the protection of water resources (requirements for clean and dirty water separation). GNR.704 requires inter alia the following:  Separation of clean (unpolluted) water from dirty water;  Collection and confinement of the water arising within any dirty area into a dirty water system;  Design, construction, maintenance and operation of the clean water and dirty water management systems so that it is not likely for either system to spill into the other more than once in 50 years;  Design, construction, maintenance and operation of any dam that forms part of a dirty water system to have a minimum freeboard of 0.8m above full supply level, unless otherwise specified in terms of Chapter 12 of the Act; and  Design, construction, and maintenance of all water systems in such a manner as to guarantee the serviceability of such conveyances for flows up to and including those arising as a result of the maximum flood with an average period of recurrence of once in 50 years.

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#### GNR.704 also stipulates that no person in control of a mine or activity may:

Locate or place any residue deposit, dam, reservoir, together with any associated structure or any other facility within the 1:100 year flood line or within a horizontal distance of 100 m from any watercourse or estuary, borehole or well, excluding boreholes or wells drilled specifically to monitor the pollution of groundwater, or on water-logged ground, or on ground likely to become water-logged, undermined, unstable or cracked;

Place or dispose of any residue or substance which causes or is likely to cause pollution of a water resource, in the workings of any underground or opencast mine excavation, prospecting diggings, pit or any other excavation; or

Use any area or locate any sanitary convenience, fuel depots, reservoir or depots for any substance which causes or is likely to cause pollution of a water resource within the 1:50 year flood line of any watercourse or estuary.



#### F) 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).

Mining has played a vital role in the economy of South Africa for over 100 years. In 2015 the mining industry contributed R286 billion towards South African Gross Domestic Product (GDP) representing 7.1% of overall GDP. Mining is a significant contributor to employment in the nation, with 457 698 individuals directly employed by the sector in 2015. This represents just over 3% of all employed nationally. (Chamber of Mines, South Africa, 17:2016)

# G) MOTIVATION FOR THE PREFERRED DEVELOPMENT FOOTPRINT WITHIN THE APPROVED SITE INCLUDING A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED DEVELOPMENT FOOTPRINT WITHIN THE APPROVED 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.

#### Location of the site

The location of the site is preferred due to the presence of river sand. The site is located approximately 10 km south of Thabazimbi. Access will be obtained from gravel roads and tar roads off the R510 and R511 roads.

#### **Preferred activity**

The mining of Sand (QY) is one of the preferred activities for the site. The presence of high amounts of river sand makes the site ideal for sand mining. The mine will provide more job opportunities than what is providing currently.

## H) A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED DEVELOPMENT FOOTPRINT WITHIN THE APPROVED SITE, INCLUDING:

#### i) DETAILS OF THE DEVELOPMENT FOOTPRINT ALTERNATIVES CONSIDERED;

#### Consideration of alternatives

The DEAT 2006 guidelines on 'assessment of alternatives and impacts' proposes the consideration of four types of alternatives namely, the no-go, site, activity, and technology alternatives. It is however, important to note that the regulation and guidelines specifically state that only 'feasible' and 'reasonable' alternatives should be explored. It also recognizes that the consideration of alternatives is an iterative process of feedback between the developer, the EAP and Interested and affected parties, which in some instances culminates in a single preferred project proposal. The following sections explore each type of alternative in relation to the proposed activity.

#### • Location alternatives

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. Also, it is expected that the applied for minerals have been deposited on this farm and therefore the applicant would like to commence with their mining activities.

According to **Figure 21** the proposed 5ha area falls within natural land cover. According to **Figure 22** the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (**Figure 23**) shows the proposed area is partially within the Krokodile river. The maps below are available under **Appendix 5**.

Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

#### Land capability

The proposed area falls within Land in Class 4. (refer to Land capability map on figure 6 and attached as Appendix 5).

According to an article on the Grain SA website by Garry Paterson from ARC-Institute for Soil, Climate and Water on the Grain SA website, agriculture rests on three pillars where natural resources are concerned. These are the soil (comprising the growth medium for the plant), the climate conditions (which supply the plant with sufficient water and heat) and the terrain (enabling the crop to be physically planted, to grow and to be harvested sustainably).

The concept of land capability combines the three natural resource elements or factors listed above (soil, climate and terrain) and uses set parameters to determine a specific class for a given area. The basis of the land capability assessment in South Africa is the well-known Land Type Survey, which is a country-wide inventory of natural resources, i.e. soil pattern, macroclimate and terrain type, carried out between 1972 and 2002 by the ARC-Institute for Soil, Climate and Water.

Each unique land type is allocated to one of eight land capability classes. These classes are based on the original USDA land capability system, whereby Classes I and II comprise areas with little or no limitations to rainfed agriculture, Classes III and IV comprise those areas which are still considered arable, but with moderate to severe restrictions. Classes V to VIII comprise non-arable land with increasingly serious restrictions, either in terms of restricted soil, steep terrain, rockiness and/or an unfavourable climatic regime. (Garry Paterson, ARC-Institute for Soil, Climate and Water, November 2014.)

#### • Activity alternatives

The environmental impact assessment process also needs to consider if the development of Sand (QY), mining would be the most appropriate land use for the particular site.

Mining of other commodities – from the surface and desktop assessment there are no indications that there are other commodities to be mined on the site except Sand (QY).

If the proposed mining permit is not granted the proposed area will remain unchanged.

#### Design and layout alternatives

Design alternatives were considered throughout the planning and design phase (i.e. where is the river sand is located?). The layout follows the limitations of the site and aspects such as, roads, infrastructure, equipment, as well as fencing—refer **Appendix 4**.

#### • Operational alternatives

The pump extracts 700 cubic meters per hour.					
210 cubic meters of sand per hour 490 cubic meters of water per hour					
More than 466 (95%) cubic meters of water flows back into the river through the outflow pipes.					

Due to the nature of the mining activities, no permanent services in terms of water supply, electricity, or sewerage services are required.

The lifetime of the project is approximately 5 years. The facility will be operational from 6 A.M. to 6 P.M., Monday to Friday, but working hours may extend to 7 P.M. and Saturdays. It is however possible that the lifetime of the project can be prolonged by a year or two and that the facility can become operational for prolonged hours or over weekends, depending on the resource.

#### No-go alternative

This alternative considers the option of 'do nothing' and maintaining the status quo. The description provided in section H of this report could be considered the baseline conditions (status quo) to persist should the no-go alternative be preferred. Should the proposed activity not proceed, the site will remain unchanged

#### <u>Technology alternatives</u>

In terms of the technologies proposed, these have been chosen based on the long term success of their mining & prospecting history. The mining activities is dependent on the preceding phase as previously discussed; therefore no alternatives are indicated.

#### Mining process

A floating barge, with a pump mounted on top, is used to pump the sand from the river bottom. Flexible floating pipes are connected to the pump, in order to transfer the sand from the river to the small "settling pond". The entrance to the pond is equipped with a sieve to ensure that only the fine sand enters the pond. The pond is also equipped with two water outflow pipes that ensures that the water flows back into the river, as soon as the sand has settled/deposited.

After the excess water has drained/flowed back into the river, the sand is removed from the settling pond and stockpiled at the demarcated stockpiling area. Here at the stockpiling area the sand will be left to dry. After the sand has dried, the sand is loaded and transported to the relevant client

#### List of equipment

- Volvo excavator
- Volvo Front End Loader
- Generator 100kva
- Screen
- Sand pump

#### <u>Dust suppression</u>

When it comes to dust suppression two main methods were considered, namely molasses stillage and the wetting (water) of roads. The table below provides a short summary of the advantages and disadvantages of each.

WATER	MOLASSES STILLAGE		
More cost effective	Much more expensive		
Could lead to the depleting of water resources	Requires less water		
	The product may be toxic to aquatic organisms. (As this product		
No damage (only if used excessively)	could have physical effects on aquatic organisms for e.g. floating,		
	osmotic damage)		
No harm to humans or animals(Only a high quantity	Not Hazardous or toxic.		
will have harm to humans or animals)	Could cause irritation to eyes, skin or when ingested and inhaled.		
Non-flammable	Non-flammable		
Eye-wash fountains not needed	Eye-wash fountains in the work place are strongly recommended		
	Working procedures should be designed to minimize worker		
	exposure to this product.		
	Storing methods are a bit more complicated. Should be stored in		
Basic storing methods	a plastic, plastic lined or stainless steel, tight closed containers		
	between 5 and 40 degrees Centigrade.		

Considering the above mentioned information, water will be used for dust suppression purposes.

#### ii) 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.

#### **NEWSPAPER ADVERTISEMENT**

An advertisement was placed in English in the local newspaper (Rustenburg Herald) on 26 August 2022 (see Appendix 6) notifying the public of the EIA process and requesting Interested and Affected Parties (I&APs) to register with, and submit their comments to Milnex CC. I&APs were given the opportunity to raise comments within 30 days of the advertisement.



#### **SITE NOTICES**

Site notices was placed (as anticipated on the coordinates below) on site in English to inform surrounding communities and immediately adjacent landowners of the proposed development. I&APs will be given the opportunity to raise comments. Photographic evidence of the site notices will be included in **Appendix 6**. Below are the coordinates where the site notices were placed.



Figure 3: Site notice co-ordinates



One of the photos of the site notices placed. Please see Appendix 6 for all the photos.

## <u>DIRECT NOTIFICATION AND CIRCULATION OF BASIC ASSESSMENT REPORT TO IDENTIFIED STALKHOLDERS,</u> <u>LANDOWNERS, SURROUNDING LANDOWNERS, OCCUPIERS & I&APS</u>

Identified I&APs, including key stakeholders representing various sectors, are directly informed of the proposed development and the availability of the **Basic Assessment Report** via registered post on **06 October 2022** and were requested to submit comments by **05 November 2022**.

A copy of the report is also available at the Milnex offices in Schweizer-Reneke, 4 Botha Street, Schweizer-Reneke and Potchefstroom (Waterberry Street, Waterberry Square, 1st floor, Office 5B, Potchefstroom), between 7:30AM and 5PM, Monday to Friday. For a complete list of stakeholder details and for proof of registered post see **Appendix 6**.

It is expected from I&APs to provide their inputs and comments within 30 days after receipt of the notification or Basic Assessment Report. When the comment period ends, all comments received will be included in the final Basic Assessment Report & EMP Report.

Table 1: List of Stakeholders, Landowners, & surrounding landowners

Stakeholders				
Department of Agriculture and Rural Development (DARD)				
Department: Mineral Resources and Energy (DMRE)				
Department of Transport and Community Safety (DTCS)				
Department of Cooperative Governance, Human Settlement and Traditional Affairs (DCoGHSTA)				
Limpopo Department of Economic Development, Environment and Tourism (LEDET)				
Department of Public Works, Roads & Infrastructure (DPWI)				
Limpopo Heritage Resources Authority (LIHRA)				
Department of Water & Sanitation (DWS)				
Office of the Regional Land Claims Commissioner: Limpopo				
Waterberg District Municipality: Municipal manager				
Thabazimbi Local Municipality: The municipal manager				
Thabazimbi Local Municipality: Ward 6 Councillor				
Thabazimbi Local Municipality: Ward 4 Councillor				
WESSA				
Interested and Affected Parties (I&APs)				
Bossie				
South African National Roads Agency SOC Ltd, (SANRAL)				
Sishen Iron Ore (Pty) Ltd				
Samrec (Pty) Ltd				
Landowner				
Thabazimbi Iron Ore Mine (Pty) Ltd				
Sishen Iron Ore Company (Pty) Ltd				
Surrounding landowners				
Johannes Petrus Coetzee				
Alfalfa Trust				
Thabazimbi Iron Ore Mine (Pty) Ltd				
Afrocol (Pty) Ltd				

#### **PUBLIC MEETING**

Please note that the Stakeholders & Interested and Affected Parties (I&APs) were informed about the proposed project with the use of press advertisement, registered letters and site notices. It was mentioned that due to COVID-19, any meetings will be conducted virtually via Zoom or Microsoft Teams upon request by the I&APs.

No meeting was requested by I&APs.

#### **ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES**

When the comment period ends, comments received was included in the comments and response table/form (See **Appendix** 6 for comments and response form).

#### iii) SUMMARY OF ISSUES RAISED BY I&APS

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

Interested and Affected Parties  List the names of persons consulted in this column, and  Mark with an X where those who must be consulted were in fact consulted.		Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issue and or response where	
Organisation	Contact person			incorporated	
Landowner					
Buffelshoek RE/351	Thabazimbi Iron Ore Mine (Pty) Ltd				
Buffelshoek 3/351	Sishen Iron Ore Company (Pty) Ltd				
Surrounding landowners					
Haakdoorndrift 1/373	Johannes Petrus Coetzee				
Haakdoorndrift 2/373	Alfalfa Trust:  Maria Elizabeth Christina du Buys				
Wachteenbietjesdraai RE/2/350, Buffelshoek RE/1/351 & Grootfontein RE/1/352	Thabazimbi Iron Ore Mine (Pty) Ltd				
Roodedam RE/1/368	Afrocol (Pty) Ltd				
Langpan 371	Elsabe Hendrina Human				
Wachteenbietjesdraai 24/350	Hendrikus Broeze				

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	Sandrivier Familietrust: A J Boshoff		
Wachteenbietjesdraai 15/350	Sandrivier Familietrust: M J Boshoff		
	Sandrivier Familietrust: L J Erasmus		
Wachteenbietjesdraai 48/350	No information available on SearchWorks		
Buffelshoek 7/351	No information available on SearchWorks		
Grootfontein 11/352	No information available on SearchWorks		
Municipality in which jurisdiction t	he development is located		
	Municipal Manager		
Thabazimbi Local Municipality	To whom it may concern		
Municipal councilor of the ward in	which the site is located		
Thabazimbi Local Municipality	Ward 6 councillor		
Thabazino Eooa Wanopany	Ward 4 councillor		
Organs of state having jurisdiction			
Department of Agriculture and Rural Development (DARD)	Head of Department: Ms Ramatsimele Jacqueline Maisel		
	Reginal Manager:		
Department: Mineral Resources and Energy (DMRE)	Mr Azwihangwisi Mulaudzi		
	Secretary		
	Ms Tebogo Mangaba		
Department of Transport and Community Safety (DTCS)	Head of Department To whom it may concern		

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

Department of Cooperative Governance, Human Settlement and Traditional Affairs (DCoGHSTA)	Head of Department To whom it may concern	
Limpopo Department of Economic Development, Environment and Tourism (LEDET)	Head of Department To whom it may concern	
Department of Public Works, Roads & Infrastructure (DPWI)	Head of Department: Mr. Dikgole Timothy Seroka	
Limpopo Heritage Resources Authority (LIHRA)	Heritage Coordinator Mr Donald Lithole	
	Luyanda Babalwa Catsha	
Department of Water & Sanitation (DWS)	Mjona Thato Danny	
	Nemafhohoni Khangwelo Munaka	
Office of the Regional Land Claims Commissioner: Limpopo	Reratiloe Mothapo	
Others		
Waterberg District Municipality	Municipal Manager  To whom it may concern	
WESSA	John Wesson	
Interested and Affected Party	Bossie	
South African National Roads Agency SOC Ltd, (SANRAL)	To whom it may concern	
Sishen Iron Ore (Pty) Ltd	Christo Reeders	
Samrec (Pty) Ltd	Brendan Botha	

#### iv) THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE SITES

#### **Baseline Environment**

The baseline environment is described with specific reference to geotechnical conditions, ecological habitat and landscape features, soil, land capability and agricultural potential, climate and the visual landscape.

#### **DFFE Screening Report**

According to the DFFE Screening Report (Appendix 7) the Environmental Sensitivity of the proposed area is as follows:

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No	EIA Reference	Classification	Status of	Distance from proposed	
	No		application	area (km)	
1	14/12/16/3/3/1/969	Solar PV	Approved	29.7	
2	14/12/16/3/1/969	Solar PV	Approved	29.7	

#### Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High	High	Medium	Low
	sensitivity	sensitivity	sensitivity	sensitivity
Agriculture Theme			X	
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural				X
Heritage Theme				
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme		Х		
Plant Species Theme				Х
Terrestrial Biodiversity Theme	X			

#### Type of environment affected by the proposed activity.

(its current geographical, physical, biological, socio- economic, and cultural character).

#### **ECOLOGICAL HABITAT AND LANDSCAPE FEATURES**

The result obtained by plotting the coordinates are as follow:

#### Dwaalboom Thornveld

The proposed area falls within vegetation unit SVcb 3, which is known as the Dwaalboom Thornveld. The Dwaalboom Thornveld is part of the Central Bushveld Bioregion, which is a sub-bioregion for the Savanna Biome.

According to Mucina and Rutherford (2006:460), the Dwaalboom Thornveld covers the Limpopo and North-West Provinces: Flats north of the Dwarsberge and associated ridges mainly west of the Crocodile River in the Dwaalboom area but including a patch around Sentrum. South of the ridges it extends eastwards from the Nietverdiend area, north of the Pilanesberg to the Northam area. Altitude 900–1 200 m.

The vegetation & landscape features can be described as plains with layer of scattered, low to medium high, deciduous microphyllous trees and shrubs with a few broad-leaved tree species, and an almost continuous herbaceous layer dominated by

grass species. *Acacia tortilis* and *A. nilotica* dominate on the medium clays (at least 21% clay in the upper soil horizon but high in the lower horizons; Figure 9.10). On particularly heavy clays (>55% clay in all horizons) most other woody plants are excluded and the diminutive *A. tenuispina* dominates at a height of less than 1 m above ground. On the sandy clay loam soils (with not more than 35% clay in the upper horizon but high in the lower horizons) *A. erubescens* is the most prominent tree. The alternation of these substrate types creates a mozaic of patches typically 1–5 km across, for example in the unit west of Thabazimbi (Mucina and Rutherford, 2006:461).

#### Some other important Taxa found on in the area:

Tall Tree: Acacia erioloba.

Small Trees: Acacia erubescens (d), A. nilotica (d), A. tortilis subsp. heteracantha (d), A. fleckii, A. mellifera subsp. detinens,

Combretum imberbe, Rhus lancea, Ziziphus mucronata.

Tall Shrubs: Acacia hebeclada subsp. hebeclada, Combretum hereroense, Diospyros lycioides subsp. lycioides, Euclea

undulata, Grewia flava, Tarchonanthus camphoratus.

Low Shrubs: Acacia tenuispina (d), Abutilon austro-africanum, Aptosimum elongatum, Hirpicium bechuanense, Pavonia

burchellii, Solanum delagoense.

Succulent Shrubs: Kalanchoe rotundifolia, Talinum caffrum.

Herbaceous Climber: Rhynchosia minima. Graminoids: Aristida bipartita (d), Bothriochloa insculpta (d), Digitaria eriantha

subsp. eriantha (d), Ischaemum afrum (d), Panicum maximum (d), Cymbopogon pospischilii,

Eragrostis curvula, Sehima galpinii, Setaria incrassata.

Herbs: Heliotropium ciliatum, Kohautia caespitosa subsp. brachyloba, Nidorella hottentotica.

Mucina and Rutherford (2006:460) also states that the conservation of this thornveld type is least threatened, with a target of 19%. Some 6% is statutorily conserved, mostly within the Madikwe Game Reserve in the west and about 14% transformed mainly by cultivation. Erosion is very low to low. This vegetation type is main use for extensive cattle grazing.

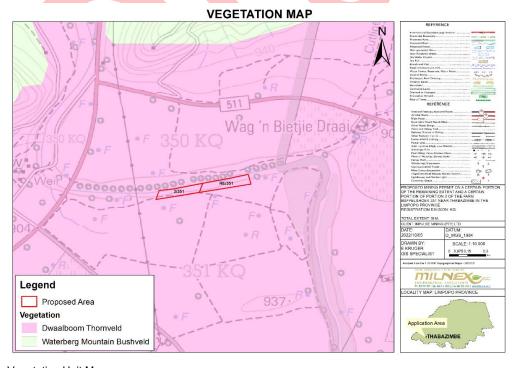


Figure 4: Vegetation Unit Map

According to the DFFE Screening Report the Plant Species theme sensitivity of the proposed area falls in Low sensitivity. Please see **Appendix 7** for the colour map.

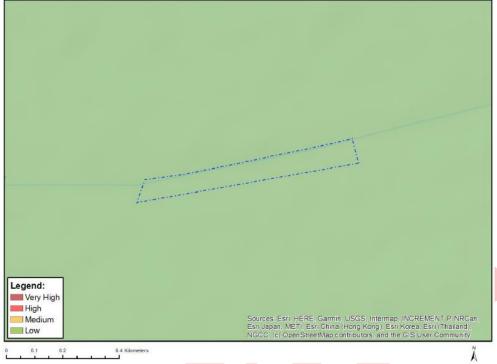


Figure 5: Plant Species Combined Sensitivity

#### **AGRICULTURAL / LAND CAPABILITY**

According to an article on the Grain SA website by Garry Paterson from ARC-Institute for Soil, Climate and Water on the Grain SA website, agriculture rests on three pillars where natural resources are concerned. These are the soil (comprising the growth medium for the plant), the climate conditions (which supply the plant with sufficient water and heat) and the terrain (enabling the crop to be physically planted, to grow and to be harvested sustainably).

The concept of land capability combines the three natural resource elements or factors listed above (soil, climate and terrain) and uses set parameters to determine a specific class for a given area. The basis of the land capability assessment in South Africa is the well-known Land Type Survey, which is a country-wide inventory of natural resources, i.e. soil pattern, macroclimate and terrain type, carried out between 1972 and 2002 by the ARC-Institute for Soil, Climate and Water.

Each unique land type is allocated to one of eight land capability classes. These classes are based on the original USDA land capability system, whereby Classes I and II comprise areas with little or no limitations to rainfed agriculture, Classes III and IV comprise those areas which are still considered arable, but with moderate to severe restrictions. Classes V to VIII comprise non-arable land with increasingly serious restrictions, either in terms of restricted soil, steep terrain, rockiness and/or an unfavourable climatic regime. (Garry Paterson, ARC-Institute for Soil, Climate and Water, November 2014.)

The proposed area falls within Land in Class IV (4). (Refer to Land capability map on figure 6 and attached as Appendix 5.

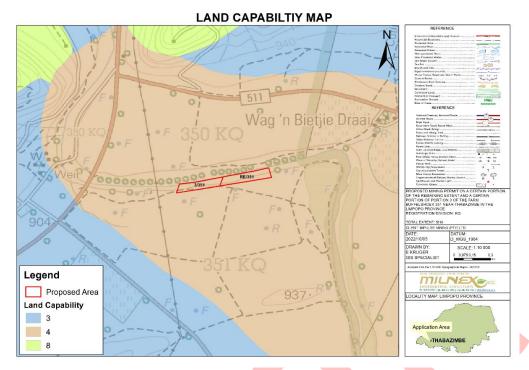


Figure 6: Land capability

According to the DFFE Screening Report the Agriculture theme sensitivity of the proposed area falls within Medium sensitivity.

Please see Appendix 7 for the colour map.

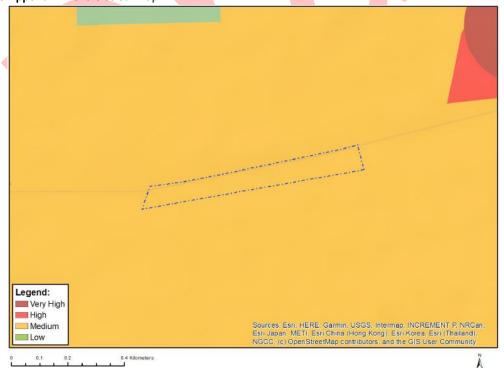


Figure 6: Agriculture Combined Sensitivity

#### THREATENED ECOSYSTEMS

Ecosystem threat status outlines the degree to which ecosystems are still intact or alternatively losing vital aspects of their structure, function and composition, on which their ability to provide ecosystem services ultimately depends (Driver et al. 2011). Datasets have been developed by SANBI (2016) in order to outline threatened ecosystems, with the primary objective of limiting the rate of ecosystem extinctions. Four established categories group these ecosystems namely: Critically Endangered (CR), Endangered (EN), Vulnerable (VU) and Protected.

According to Figure 7, the area does not fall within a threatened ecosystem

#### **PROTECTED AREAS**

Formally protected areas are protected either by national or provincial legislation. Based on the SANBI (2010) Protected Areas Map (**Figure 7**), the proposed area does not fall within a formally protected area. The Ben Alberts Nature Reserve is ± 3km from North West from the proposed area.

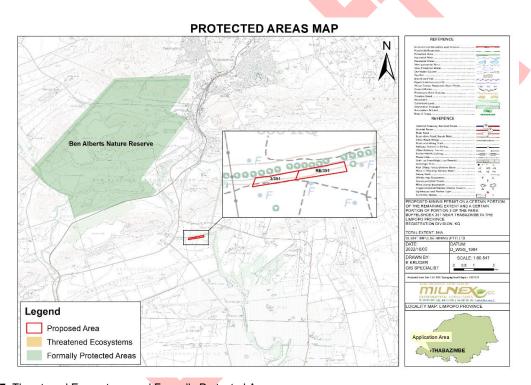


Figure 7: Threatened Ecosystems and Formally Protected Area.

#### NATIONAL PROTECTION AREA EXPANSION STRATEGY (NPAES)

According to the National Protected Area Expansion Strategy for South Africa 2016, the goal of the NPAES is to achieve cost effective protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. It sets protected area targets, maps priority areas for protected area expansion, and makes recommendations on mechanisms to achieve this.

Figure 8 below shows the proposed area does not fall within a NPAES.

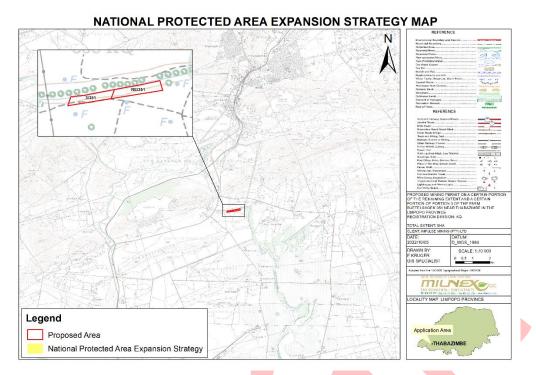


Figure 8: National Protection Area Expansion Strategy

#### STRATEGIC WATER SOURCE AREA MAP

Strategic Water Source areas are areas that supply areas of geographic interest with a varying amount of water

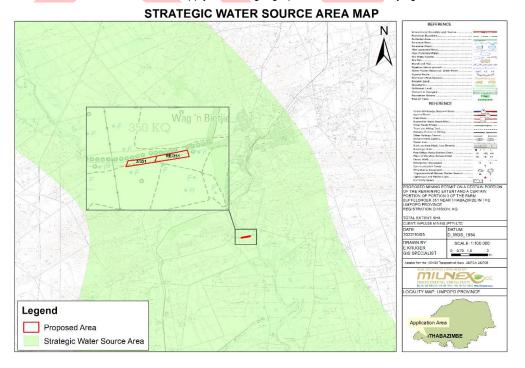


Figure 9: Strategic Water Source Area

#### CRITICAL BIODIVERSITY AREA

Critical Biodiversity Areas (CBAs) are terrestrial and aquatic areas of high biodiversity value that need to be conserved and maintained in a natural or near-natural state to ensure the continued existence and functioning of species and ecosystems and the delivery of ecosystem services (MTPA, 2014). According to the National Environmental Management Act (NEMA) (Act no. 107 of 1998) certain activities have strict guidelines or are prohibited within CBAs and ESAs. Refer to the listed activities under the NEMA: Environmental Impact Assessment Regulations of 2014 (GNR982) as promulgated in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) [as amended] for a comprehensive breakdown. The following terms are used to categorise the various land used types according to their biodiversity and environmental importance:

- Critical Biodiversity Area One (CBA1)
- Critical Biodiversity Area Two (CBA2)
- Ecological Support Area (ESA)
- Other Natural Areas (ONA) and
- Protected Area (PA).

The proposed area falls within CBA2, as illustrated on the map below (Figure 10).

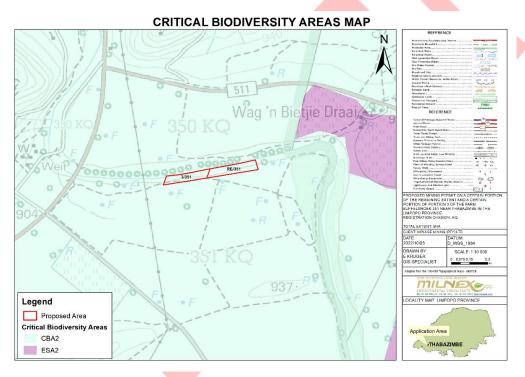


Figure 10: Critical Biodiversity Areas (CBAs) associated with the study site.

According to the DFFE Screening Report the proposed area falls within Very High Terrestrial Biodiversity sensitivity. Please see **Appendix 7** for the colour map.

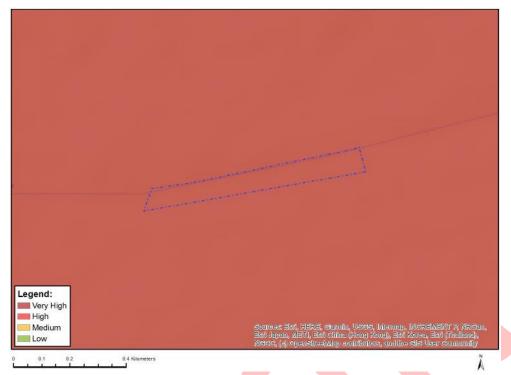


Figure 11: Terrestrial Biodiversity Combined Sensitivity

According to the DFFE Screening Report the proposed area falls within High Aquatic Biodiversity theme sensitivity. Please see **Appendix 7** for the colour map.



Figure 12: Aquatic Biodiversity Combined Sensitivity

According to the DFFE Screening report the Animal Species theme sensitivity falls in High and Medium sensitivity. Please see **Appendix 7** for the colour map.

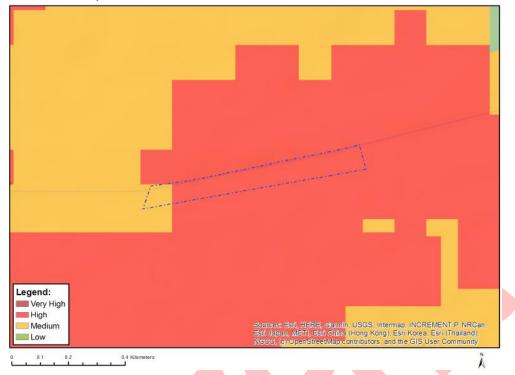


Figure 13: Animal Species theme sensitivity

#### **BIODIVERSITY PRIORITY AREAS FOR MINING**

The Mining and Biodiversity Guideline was developed in 2013 for the purpose of mainstreaming biodiversity management practices into the mining sector (DEA, DMRE, Chamber of Mines, SAMBF & SANBI 2013). This Guideline provides explicit direction in terms of where mining-related impacts are legally prohibited, where biodiversity priority areas may present high risks for mining projects, and where biodiversity may limit the potential for mining. The Guideline distinguishes between four categories of biodiversity priority areas in relation to their importance from a biodiversity and ecosystem service perspective as well as the implications for mining in these areas (Table 2).

Table: Four categories of biodiversity priority areas in relation to their biodiversity importance and implications for mining.

Category	Biodiversity Priority Areas	Risks for Mining	Implications for Mining
A. Legally Protected	Protected areas (including National Parks, Nature Reserves, World Heritage Sites, Protected Environments, Nature Reserves)     Areas declared under Section 49 of the Mineral and Petroleum Resources Development Act (No. 28 of 2002)	Mining Prohibited	Mining projects cannot commence as mining is legally prohibited. Although mining is prohibited in Protected Areas, it may be allowed in Protected Environments if both the Minister of Mineral Resources and Minister of Environmental Affairs approve it.  In cases where mining activities were conducted lawfully in protected areas before Section 48 of the Protected Areas Act (No. 57 of 2003) came into effect, the Minister of Environmental Affairs may, after consulting with the Minister of Mineral Resources, allow such mining activities to continue, subject to

			prescribed conditions that reduce environmental impacts.
B. Highest Biodiversity Importance			Environmental screening, environmental impact assessment (EIA) and their associated biodiversity specialist studies should focus on confirming the presence and significance of these biodiversity features, and to provide site-specific basis on which to apply the mitigation hierarchy to inform regulatory decision-making for mining, water use licences, and environmental authorisations.
	<ul> <li>Critically endangered and endangered ecosystems</li> <li>Critical Biodiversity Areas (or equivalent areas) from provincial spatial biodiversity plans</li> <li>River and wetland Freshwater Ecosystem Priority Areas (FEPAs) and a 1km buffer around these FEPAs</li> <li>Ramsar Sites</li> </ul>	Highest Risk for Mining	If they are confirmed, the likelihood of a fatal flaw for new mining projects is very high because of the significance of the biodiversity features in these areas and the associated ecosystem services. These areas are viewed as necessary to ensure protection of biodiversity, environmental sustainability, and human well-being.
			An EIA should include the strategic assessment of optimum, sustainable land use for an area and will determine the significance of the impact on biodiversity.
			This assessment should fully consider the environmental sensitivity of the area, the overall environmental and socio-economic costs and benefits of mining, as well as the potential strategic importance of the minerals to the country.
			Authorisations may well not be granted. If granted, the authorisation may set limits on allowed activities and impacts and may specify biodiversity offsets that would be written into licence agreements and/or authorisations.
	Protected area buffers (including buffers around National Parks, World Heritage Sites* and Nature      December 1		These areas are important for conserving biodiversity, for supporting or buffering other biodiversity priority areas, and for maintaining important ecosystem services for communities or the country.
C. High Biodiversity Importance	outside of formally proclaimed protected areas)  Other identified priorities	High Risk for Mining	An EIA should include an assessment of optimum, sustainable land use for an area and will determine the significance of the impact on biodiversity.
			Mining options may be limited in these areas, and limitations for mining projects are possible.
	from provincial spatial biodiversity plans  High water yield areas Coastal Protection Zone		Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.

	Estuarine functional zone     *Note that the status of buffer areas of World Heritage Sites is subject to a current intragovernmental process		
D. Moderate Biodiversity Importance	<ul> <li>Ecological support areas</li> <li>Vulnerable ecosystems</li> <li>Focus areas for protected area expansion (land-based and offshore protection)</li> </ul>	Moderate Risk for Mining	These areas are of moderate biodiversity value.  EIAs and their associated specialist studies should focus on confirming the presence and significance of these biodiversity features, identifying features (e.g. threatened (land-based and offshore protection) species) not included in the existing datasets, and on providing site-specific information to guide the application of the mitigation hierarchy.  Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.

Based on Figure 12, the proposed area falls within Category B: Highers Biodiversity Importance.

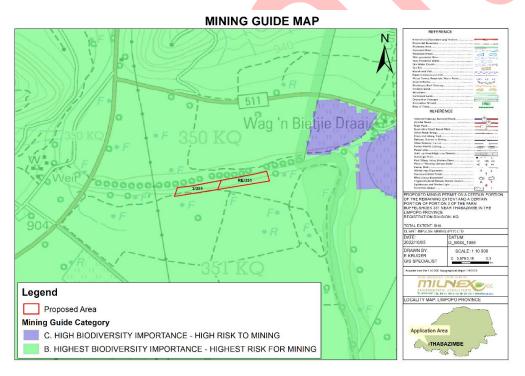


Figure 14: Biodiversity priority areas, in accordance with the Mining of Biodiversity Guidelines, associated with the study site.

#### **WETLAND AREAS**

In terms of Section 1 of the National Water Act (No. 36 of 1998) (NWA), wetlands are legally defined as: "land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil" (NWA 1998).

Wetlands are defined by the presence of unique soils and vegetation that do not occur in terrestrial and purely aquatic environments (Edwards *et al.* 2018). Wetland soils are referred to as hydric soils that develop under anaerobic conditions (condition where oxygen is virtually absent from the soil). Wetlands are also typically characterized by relatively large and dense stands of plants sticking out of shallow water or wet soil. Plants adapted to such waterlogged conditions are referred to as hydrophytes. Wetlands are distinct from true aquatic ecosystems like river ecosystems, which are characterized by fast flowing water within channels, and lake ecosystems, that are flooded to great depth; both of which are not primarily characterized by the occurrence of hydric soils and hydrophytes.

A wide variety of wetland types are present in South Africa, and can be classified into six broad types, namely floodplain wetlands, unchannelled valley bottom wetlands, channelled valley bottom wetlands, seeps, depressions and wetland flats. Owing to the large variations in climate and topography across South Africa, vegetation and habitat associated with these wetland types vary tremendously from subtropical reed beds and tall swamp forests to arid salt pans, which all support unique and varied animal life.

**Figure 15** illustrates all wetland types associated with the study site. According to the map the proposed area falls withing a Floodplain wetland. The wetland vegetation on proposed site falls within Central Bushveld Group 2 (**Figure 16**).

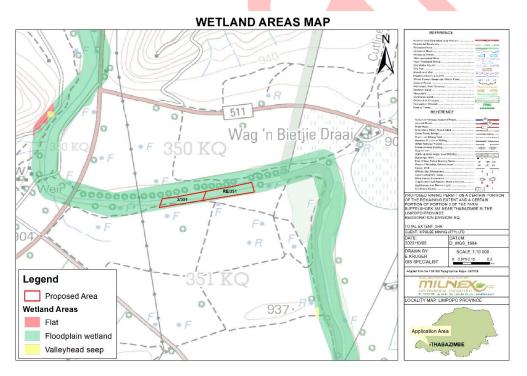


Figure 15: Wetland types located within or near the study site.

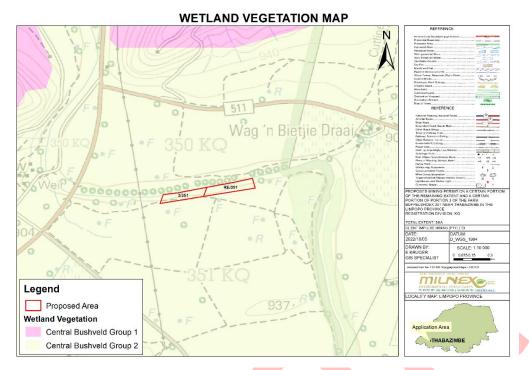


Figure 16: Wetland vegetation types associated with the study site.

#### **RIVER ECOSYSTEM STATUS**

The figure below depicts the river ecosystem status, the non-perennial river falls in Class D: Largely modified.

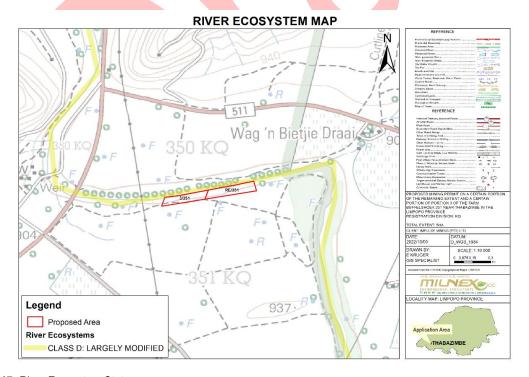


Figure 17: River Ecosystem Status

#### **IMPORTANT BIRD AND BIODIVERSITY AREAS**

Important Bird and Biodiversity Areas (IBAs) are a network of sites that are significant for the long-term viability of naturally occurring bird populations (Birdlife 2019). Many sites are also important for other forms of biodiversity; therefore, the conservation of Important Bird & Biodiversity Areas ensures the survival of a correspondingly large number of other animals and plants.

No IBAs were identified within the vicinity of the study site (Figure 18).



Figure 18: Important Bird and Biodiversity Areas associated with the study site.

#### **DESCRIPTION OF THE SOCIO-ECONOMIC ENVIRONMENT**

#### Thabazimbi Local Municipality

The Thabazimbi Local Municipality is a Category B municipality located within the Waterberg District in the south-western part of the Limpopo Province. It has Botswana as its international neighbour and is a mere two-hour drive from Pretoria. It is one of five municipalities in the district.

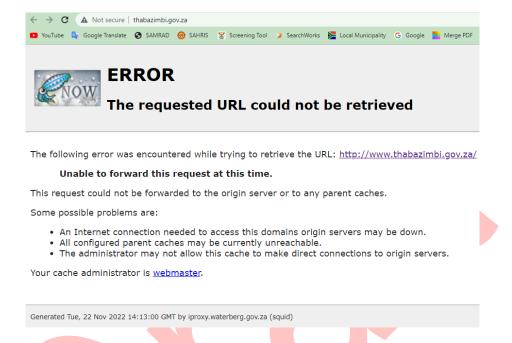
- Thabazimbi is known as 'mountain of iron', which is a Setswana name referring to the highly lucrative iron ore reef first discovered in the municipality in 1919. The municipality has Marakele National Park, which is a subsidiary of the National Parks Board, and in the same standard as the Kruger National Park and Mapungube. It has been mined since the 1930s, when iron and steel production started. Apart from iron ore, the Thabazimbi Municipality is surrounded by platinum-producing areas. Other minerals produced in the area include andalusite.
- Agriculture has also proven to be a strong economic sector in the municipality. Agricultural commodities produced are
  wheat, beans and maize. The municipality's goals are aligned with those of the Provincial Growth and Development
  Strategy in Limpopo. This will ensure that the growth trajectory also addresses the objective of poverty eradication
  through job creation and business opportunity stimulation.

Area: 11 190km<sup>2</sup>

Cities/Towns: Amandelbult Mine Town, Thabazimbi

Main Economic Sectors: Mining, agriculture, tourism

Please note the website of the Thabazimbi Local Municipality is not working to get mor information.



#### Waterberg District Environmental Management Framework Report

#### **Economic Characteristics and Drivers**

The sector that contributes most to the GDP of the Waterberg District is mining. However, the sector that employs the largest number of people is agriculture. With future developments set to take place in the Waterberg District, it is likely that current GDP and employment trends will change. In terms of the population, three local municipalities registered positive growth with Modimolle registering the biggest growth followed by Mogalakwena. Changes of municipal demarcations may have impacted on the growth trends observed.

#### Population Characteristics

The Waterberg District Municipality area has an estimated total population of 572 625. Most of the people in the District are distributed around Mogalakwena, Lephalale, as well as the Thabazimbi local municipality areas respectively. The education levels are relatively low within the Waterberg District. The working population tend to fall into two main brackets that earn between R1 to R400 and R6401 to R12 800 per month.

#### **CULTURAL AND HERITAGE ASPECTS**

According to the DFFE Screening Report the proposed area falls within low Archaeological and Cultural Heritage Theme Sensitivity. Please see map colour map under **Appendix 7.** 

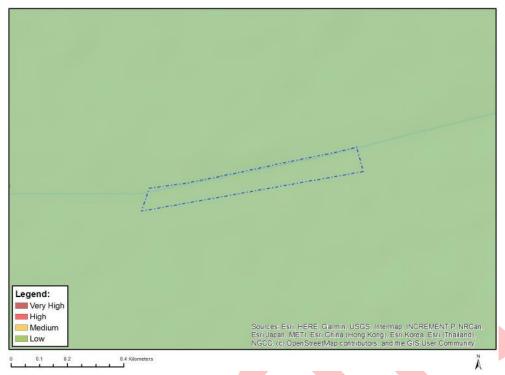


Figure 19: Archaeological and Cultural Heritage Combined Sensitivity

According to the DFFE Screening Report the proposed area falls within High Paleontology Theme Sensitivity. Please see map colour map under **Appendix 7**.



Figure 20: Relative Paleontology Theme Sensitivity

Cultural Heritage in South Africa (includes all heritage resources) is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). According to Section 3 of the Act, all Heritage resources include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

If such resources are found during the mining or development activities, they shall not be disturbed without a permit from the relevant heritage resource Authority, which means that before such sites are disturbed by development it is incumbent on the developer to ensure that a heritage impact assessment is done and the Provincial Heritage Resources Authority and SAHRA must be contacted immediately and work must stop.

If anything of Archaeological and/or paleontological significance is found during the construction and operational phase of the mine the following applies:

- NHRA 38(4)c(i) If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)e The following conditions apply with regards to the appointment of specialists: i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.

#### **Chance Find Procedure**

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following:
   1) date of the find;
   2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil),
   GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.

- The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sandbags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager).
   Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the
  affected area.

#### DESCRIPTION OF THE CURRENT LAND USES.

According to **Figure 21** the proposed 5ha area falls within natural land cover. According to **Figure 22** the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, **Grassland and Bare non** vegetation. The google earth map (**Figure 23**) shows the proposed area is partially within the Krokodileriver. The maps below are available under **Appendix 5**.

Please see figure 24 (photos) below how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

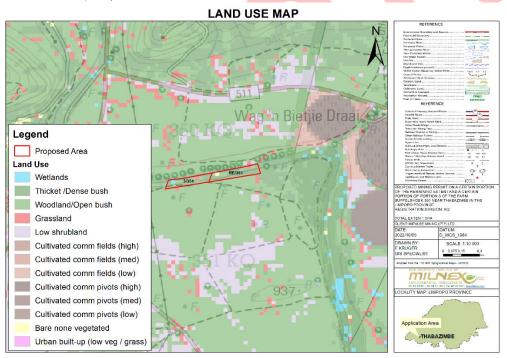


Figure 21: Land use map associated with study site and surrounding areas.

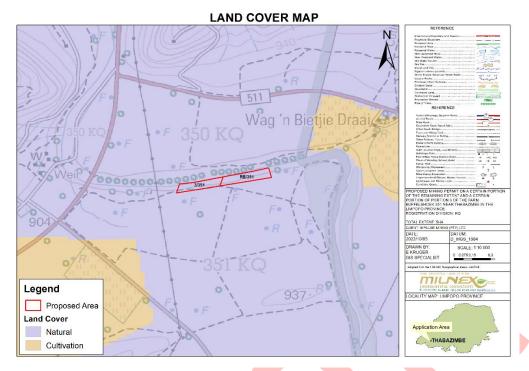


Figure 22: Landcover map associated with study site and surrounding areas.



Figure 23: Google earth map of the proposed area.



Figure 24: Photos of proposed area (Appendix 8)

- v) IMPACTS AND RISKS IDENTIFIED INCLUDING THE NATURE, SIGNIFICANCE, CONSEQUENCE, EXTENT, DURATION AND PROBABILITY OF THE IMPACTS, INCLUDING THE DEGREE TO WHICH THESE IMPACTS
- (aa) can be reversed;
- (bb) may cause irreplaceable loss of resources; and
- (cc) can be avoided, managed or mitigated;

#### Significance of potential impacts

The following sections present the outcome of the significance rating exercise. The results suggest that the mining activities will have an impact on the natural vegetation and the agricultural activities, if not properly mitigated.

#### INITIAL CLEARANCE AND SITE PREPARATION PHASE

**Direct impacts:** During this phase minor negative impacts are foreseen over the short term. The latter refers to a period of weeks. The site preparation may result in the loss or fragmentation of indigenous natural fauna and flora, loss or fragmentation of habitats, soil erosion, hydrology, and temporary noise disturbance, generation of waste, visual intrusions, increase in heavy vehicle traffic, and risk to safety, livestock and farm infrastructure, and increased risk of veld fires. The abovementioned impacts are discussed in more detail below:

• Loss, destruction or fragmentation of indigenous natural fauna and flora:

The proposed area falls mostly within the Crocodile River.

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

The rest of the proposed area falls within the Dwaalboom Thornveld.

The Dwaalboom Thornveld is part of the Central Bushveld Bioregion, which is a sub-bioregion for the Savanna Biome.

According to Mucina and Rutherford (2006:460), the Dwaalboom Thornveld covers the Limpopo and North-West Provinces: Flats north of the Dwarsberge and associated ridges mainly west of the Crocodile River in the Dwaalboom area but including a patch around Sentrum. South of the ridges it extends eastwards from the Nietverdiend area, north of the Pilanesberg to the Northam area. Altitude 900–1 200 m.

The vegetation & landscape features can be described as plains with layer of scattered, low to medium high, deciduous microphyllous trees and shrubs with a few broad-leaved tree species, and an almost continuous herbaceous layer dominated by grass species. *Acacia tortilis* and *A. nilotica* dominate on the medium clays (at least 21% clay in the upper soil horizon but high in the lower horizons; Figure 9.10). On particularly heavy clays (>55% clay in all horizons) most other woody plants are excluded and the diminutive *A. tenuispina* dominates at a height of less than 1 m above ground. On the sandy clay loam soils (with not more than 35% clay in the upper horizon but high in the lower horizons) *A. erubescens* is the most prominent tree. The alternation of these substrate types creates a mozaic of patches typically 1–5 km across, for example in the unit west of Thabazimbi (Mucina and Rutherford, 2006:461).

Mucina and Rutherford (2006:460) also states that the conservation of this thornveld type is least threatened, with a target of 19%. Some 6% is statutorily conserved, mostly within the Madikwe Game Reserve in the west and about 14% transformed mainly by cultivation. Erosion is very low to low. This vegetation type is main use for extensive cattle grazing.

#### **DEA Screening Report findings:**

- Plant Species theme sensitivity: Low sensitivity
- Aquatic Biodiversity sensitivity: Very High sensitivity
- Terrestrial Biodiversity sensitivity: Very High sensitivity.
- Animal Species sensitivity: High and Medium sensitivity

Loss or fragmentation of indigenous natural fauna and flora	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (1)	Local (1)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impacts (3)	
Significance	Negative medium impact (48)	Negative low (28)
Can impacts be mitigated?	Negative medium impact (48)  If the development is approved, contractors must ensure the mammalian species are disturbed, trapped, hunted or killed. development is approved, every effort should be made to confinit footprint to the blocks allocated for the development and have the possible edge effects on the surrounding area. The EMPr also prenumerous mitigation measures – refer to section (f) of the EMPr.  The potential impacts associated with damage to and loss of far should be effectively mitigated. The aspects that should be constituted:  The site should be fenced off prior to commencement of constitutions:	

•	The footprint associated with the construction related activities (access roads, construction platforms, workshop etc.) should be confined to the fenced off area and minimised where possible; An Environmental Control Officer (ECO) should be appointed to
	monitor the establishment phase of the construction phase;
•	All areas disturbed by construction related activities, such as access roads on the site, construction platforms, workshop area etc., should be rehabilitated at the end of the construction phase;
•	The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed. Specifications for the rehabilitation are provided throughout the
	EMPr – section (f) of the EMPr.
•	The implementation of the Rehabilitation Programme should be monitored by the ECO.

#### • Loss destruction or fragmentation of habitats -

According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.

Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

#### **DEA Screening Report findings:**

- Plant Species theme sensitivity: Low sensitivity
- Aquatic Biodiversity sensitivity: Very High sensitivity
- Terrestrial Biodiversity sensitivity: Very High sensitivity.
- Animal Species sensitivity: High and Medium sensitivity

Loss or fragmentation of habitats	Pre-mitigation impact rating	Post mitigation impact rating	
Status (positive or negative)	Negative	Negative	
Extent	Local (1)	Site (1)	
Probability	Definite (4)	Definite (4)	
Duration	Medium term (2)	Medium term (2)	
Magnitude	High (3)	Medium (2)	
Reversibility	Barely reversible (3)	Partly reversible (2)	
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resource (2)	
Cumulative impact	Medium cumulative impacts (3)		
Significance	Negative Medium impact (48)	Negative low (28)	
Can impacts be mitigated?	Exotic and invasive plant species should not be allowed to establish, if the		
	development is approved. Where ex	otic and invasive plant species are	
	found at the site continuous erac	lication should take place. If the	
	development is approved, every eff	ort should be made to confine the	

footprint to the blocks allocated for development – section (f) of the EMPr
also provides numerous mitigation measures related to fauna and flora.

<u>Loss of topsoil</u> – Topsoil may be lost due to poor topsoil management (burial, erosion, etc.) during construction related soil profile
disturbance (levelling, excavations, disposal of spoils from excavations etc.) The effect will be the loss of soil fertility on disturbed
areas after rehabilitation.

Loss of topsoil	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Geographical extent	Site (1)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Low cumulative impacts (2)	
Significance	Negative Low (24)	Negative Low (9)
Can impacts be mitigated?	then any available topsoil she surface and stockpiled for reference and stockpiled for reference and stockpiles must be erosion by establishing vege.  Dispose of all subsurface spread on undisturbed lateral and over the entire disturble.  Erosion must be controlled with the subsurface and over the entire disturble.  Erosion must be controlled with the record for constructional purpoincled in environmental performation the records below.  Record the GPS coordinates.  Record the GPS coordinates.  Record the GPS coordinates.  Record the date of cessation activities at the particular site.  Photograph the area on cess.  Record date and depth of reforming the reference and depth of respectively.	y disturb below surface in any way, ould first be stripped from the entire -spreading during rehabilitation. conserved against losses through tation cover on them. bills from excavations where they will nd. stockpiled topsoil must be evenly bed surface. There necessary on top soiled areas. If g system for each area where soil is losses. These records should be ance reports, and should include all so of each area. Inipping. It of where the topsoil is stockpiled. In of constructional (or operational) expression of constructional activities. In of each area activities. In of constructional activities. In of constructional activities. In of constructional activities. In of construction of rehabilitation and on an activity of the stripping of topsoil. In pletion of rehabilitation and on an activity of the stripping of topsoil. In pletion of rehabilitation and on an activity of the stripping of topsoil. In pletion of rehabilitation and on an activity of the stripping of topsoil. In pletion of rehabilitation and on an activity of the stripping of topsoil.

Soil erosion – Soil erosion due to alteration of the land surface run-off characteristics. Alteration of run-off characteristics may be caused by construction related land surface disturbance, vegetation removal and the establishment of roads. Erosion will cause loss and deterioration of soil resources. This will result in grazing potential being lost, and also the increased turbidity and total suspended solids in the river.

Soil erosion	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Geographical extent	Local (2)	Site (1)
Probability	Definite (4)	Possible (2)
Duration	Permanent (4)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Party reversable (2)
Irreplaceable loss of resources	Significant (3)	Marginal (2)
Cumulative impact	Low cumulative impact (1) if rehabilitated.	
Significance	Negative High (51)	Negative low (20)
Can impacts be mitigated?	The following mitigation or management measures are provided Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion.  Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly.  Include periodical site inspection in environmental performance.	
	reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence any erosion on site or downstream – refer to section (f) of the EMPr	

• <u>Temporary noise disturbance</u> - Preparation activities will result in the generation of noise over a period of months. Sources of noise are likely to include vehicles, the use of machinery such as back actors and people working on the site. The noise impact is unlikely to be significant; since there is an existing mine adjacent the proposed area but activities should be limited to normal working days and hours (6:00 – 18:00).

Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss (2)	Marginal loss (2)
Cumulative impact	Low cumulative impact (2).	·
Significance	Negative low (22)	Negative low (20)

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

Can impacts be mitigated?	Yes, management actions related to noise pollution are include		
	in section (f) of the EMPr.		

Generation of waste - general waste, construction waste, sewage and grey water - The workers on site are likely to generate
general waste such as food wastes, packaging, bottles, etc. The applicant will need to ensure that general waste is appropriately
disposed of i.e. taken to the nearest licensed landfill. Sufficient ablution facilities will have to be provided, in the form of portable/VIP
toilets. No pit latrines, French drain systems or soak away systems shall be allowed.

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Possible (2)
Duration	Medium term (1)	Medium term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Irreversible (4)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Medium cumulative impact (3) - An additional demand for landfill	
	space could result in significant cumulative impacts if services	
	become unstable or unavailable	, which in turn would negatively
	impact on the local community.	If general waste is left on site
	livestock could mistakenly eat it	which might in turn harm or kill
	them.	
Significance	Negative Medium (30)	Negative low (11)
Can impacts be mitigated?	Yes, it is therefore important the	nat all management actions and
	mitigation measures included i	n section (f) of the EMPr are
	implemented.	

Impacts on heritage objects -

#### **DEA Screening Report findings:**

- Paleontology Theme Sensitivity: High sensitivity
- Archaeological and Cultural Heritage Theme Sensitivity: Low Sensitivity

Cultural Heritage in South Africa (includes all heritage resources) is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). According to Section 3 of the Act, all Heritage resources include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

If such resources are found during the mining or development activities, they shall not be disturbed without a permit from the relevant heritage resource Authority, which means that before such sites are disturbed by development it is incumbent on the developer to ensure that a heritage impact assessment is done and the Provincial Heritage Resources Authority and SAHRA must be contacted immediately and work must stop.

If anything of Archaeological and/or paleontological significance is found during the construction and operational phase of the mine the following applies:

NHRA 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous
ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other
categories of heritage resources are found during the proposed development, SAHRA APM Unit (021 462 5402) must

be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- NHRA 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)e The following conditions apply with regards to the appointment of specialists: i) If heritage resources are
  uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the
  nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered
  heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be
  required subject to permits issued by SAHRA;

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.

#### **Chance Find Procedure**

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. No attempt should be made to remove material from their
  environment. The exposed finds must be stabilized and covered by a plastic sheet or sandbags. The Heritage agency will also
  be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.

Impacts on heritage objects	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Possible (2)
Duration	Medium term (1)	Medium term (1)
Magnitude	High (3)	Medium (2)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resource (2)

Cumulative impact	The impact would result in negligible to no cumulative effects (1).	
Significance	Negative Medium (39) Negative low (22)	
Can impacts be mitigated?	If archaeological sites or graves are exshould immediately be reported to a investigation and evaluation of the finds (f) of the EMPr.	heritage practitioner so that an

*Indirect impacts:* The nuisance aspects generally associated with the installation of infrastructure or ground preparation will also be applicable to this development, which relates primarily to the increase in vehicle traffic associated with prospecting / mining practices, the influx of job seekers to the area, risk to safety, livestock and farm infrastructure, and increased risk of veld fires.

• Increase in vehicle traffic – The movement of heavy vehicles have the potential to damage local farm roads and create dust and safety impacts for other road users in the area. Access will be obtained from gravel and tar roads off the R510 and R511 roads. The volume of traffic along this roads are medium to high and the movement of heavy vehicles along this road is likely to damage the road surface and impact on other road users. The contractor should be required to ensure that damage to the gravel road is repaired periodically if they use it. The movement of additional heavy vehicle traffic will add significantly to the current traffic load on the road. The impact on the gravel roads is therefore likely to be moderate.

Increase in vehicle traffic	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Low cumulative impact (2). If damage to roads is not repaired, then this will affect the farming activities in the area and result in higher maintenance costs for vehicles of local farmers and other road users. The costs will be borne by road users who were no responsible for the damage.	
Significance	Negative low impacts (22)	Negative low (8)
Can impacts be mitigated?	Negative low impacts (22)     Negative low (8)  The potential impacts associated with heavy vehicles can be effectively mitigated. The mitigation measures include:  The contractor must ensure that damage caused by construction on the off-gravel roads. The costs associated with the repair must be borne by the contractor;  Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers;  All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits.	
	Also refer section (f) of the EMPr. For n	nitigation measures related to traffic.

• Risk to safety, livestock/game and farm infrastructure - The presence on and movement of workers on and off the site poses a potential safety threat to local famer's, farm workers and the communities in the vicinity of the site. In addition, farm infrastructure, such as fences and gates, may be damaged and stock losses may also result from gates being left open and/or fences being damaged, or stock theft linked either directly or indirectly to the presence of farm workers on the site.

However, it should be noted that there is an existing mine adjacent the proposed area.

Risk to safety, livestock and farm infrastructure	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Partly reversible (2)	Completely reversible (1)
Irreplaceable loss of resources	Marginal resource (2)	Marginal resource (2)
Cumulative impact	Low cumulative effects (2), provide	ed losses are compensated for.
Significance	Negative low (24)	Negative low (10)
Can impacts be mitigated?	with the local farmers in the a property etc. during the compensated for. The agree the construction phase commencement of the construction workers on the fenced off area;  Contractors appointed by Improvide daily transport for locand from the site. This wout trespassing on the remaind properties;  Impulse Mining (Pty) Ltd she compensating farmers in furth damage to farm infrastruction workers. This she of Conduct to be signed contractors and neighbouring should also cover loses and caused by construction workers. The Environmental Managem outline procedures for management of the contractors appointed improved the contractors appointed im	hould enter into an agreement area whereby damages to farm construction phase will be ment should be signed before nences; and be fenced off prior to the truction phase. The movement is site should be confined to the pulse Mining (Pty) Ltd should we and semi-skilled workers to lid reduce the potential risk of liter of the farm and adjacent and hould hold contractors liable for any stock losses and/or sture that can be linked to hould be contained in the Code between the proponent, the glandowners. The agreement did costs associated with fires or known that the contained in the Code between the proponent, the glandowners associated with fires or construction related then Programme (EMPr) should ging and storing waste on site, the poses a threat to livestock if the livestock if the livestock of the livest

construction phase of the conditions contained on the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.  Contractors appointed by Impulse Mining (Pty) Ltd must ensure that construction workers who are found guilty of trespassing, stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation;
<ul> <li>The housing of construction workers on the site should be strictly limited to security personnel (if any).</li> </ul>

• Increased risk of veld fires - The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could in turn pose a threat to livestock/game, crops, wildlife, farmsteads and the communities in the area. In the process, infrastructure may also be damaged or destroyed and human lives threatened. The potential risk of grass fires was heightened by the windy conditions in the area, especially during the dry, windy winter months from May to October. Fire-fighting equipment should be provided on site during the construction phase.

Increased risk of veld fires	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Probable (3)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss (3)	Marginal loss (2)
Cumulative impact	High cumulative effects (4), provided lo	sses are compensated for.
Significance	Negative high (51)	Negative low (24)
Can impacts be mitigated?	<ul> <li>to the commencement of the consistence of the contractor should ensure that op heating are not allowed except in a contractor to ensure that construe potential fire risk, such as welding confined to areas where the risk of to reduce the risk of fires include conditions when the risk of fires is should be taken during the high rise.</li> <li>Contractor to provide adequate fire a fire fighting vehicle;</li> <li>Contractor to provide fire-fighting to the construction staff, with the accommodated on site over night;</li> <li>As per the conditions of the Code being caused by construction working that the contraction working th</li></ul>	en fires on the site for cooking or designated areas; action related activities that pose a ng, are properly managed and are fires has been reduced. Measures de avoiding working in high wind greater. In this regard special care

caused to their farms. The contractor should also compensate the
firefighting costs borne by farmers and local authorities.

#### **OPERATIONAL PHASE**

**Direct impacts:** During the operational phase the study area will serve as a mining area and the impacts are generally associated with soil erosion, change in land use, impacts associated with the, increase in storm water runoff, increased consumption of water, visual intrusion, the generation of general waste, leakage of hazardous materials, and the change in the sense of place. The operational phase will also have a direct positive impact through the provision of permanent employment opportunities and facilitating a positive economic growth. The abovementioned impacts are discussed in more detail below:

Soil erosion – The largest risk factor for soil erosion will be during the operational phase when the mining activity ensues, and soil is left bare until it is rehabilitated. Erosion will be localised within the site. This will ultimately lead to the irretrievable commitment of this resource. The measurable effect of reducing erosion by utilizing mitigation measures may reduce possible erosion significantly. The conditions of the EMP will be adhered to throughout the mining operation and commitment to rehabilitation is of paramount importance in order to obtain a closure certificate from DMRE.

Soil erosion	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Definite (4)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Completely reversible (1)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impact (3). Should	these impacts occur, there will be a
	cumulative impact on the air and water	resources in the study area in terms
	of pollution.	
Significance	Negative High (51)	Negative Low (20)
Can impacts be mitigated?	Yes, to avoid soil erosion it will be a good practice to not remove all the vegetation at once but to only clear the area as it becomes necessary and to implement concurrent rehabilitation.  The following mitigation or management measures are provided: Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion.  Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil microtopography and revegetation or soil erosion control efforts accordingly	
	Also refer to section (f) of the EMPr.	

Change in land-use - According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.

Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

Change in land use	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Possible (3)	Possible (3)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Barely reversible (3)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Low cumulative effects (2) - the right h	older should enter into a surface use
	agreement with the landowner to compensate for any financial losses.	
Significance	Negative low (26)	Negative low (10)
Can impacts be mitigated?	The proponent should establish a F	Rehabilitation Fund to be used to
	rehabilitate the area once the proposed facility has been decommissioned.	
	The fund should be funded by revenue generated during the operational	
	phase of the project. The motivation for the establishment of a Rehabilitation	
	Fund is based on the experience in the mining sector where many mines on	
	closure have not set aside sufficient funds for closure and decommissioning.	
	Also refer to section (f) of the EMPr.	

Generation of alternative land use income – Income generated through the potential mining of the minerals will provide the
farming enterprise with increased cash flow and rural livelihood, and thereby improve the financial sustainability of farming
on site.

Generation of alternative land use income	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Geographical extent	Local (2)	Local (2)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	High (3)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resources (1)	No loss of resources (1)
Cumulative impact	Medium cumulative impact (3).	
Significance	Positive medium (39)	Positive medium (39)
Can impacts be mitigated?	No mitigation required.	

Increase in storm water runoff – The development will potentially result in an increase in storm water run-off that needs to be
managed to prevent soil erosion, especially where vegetation will be cleared. Not all the vegetation should be removed at once.
 Since the proposed area is to mine sand from the river, only the areas where the stockpiles, equipment, site area, etc must be
cleared.

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

Increase in storm water runoff	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Probable (3)	Possible (2)
Duration	Long term (3)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impact (3) - Should these impacts occur, there will be	
	a cumulative impacts on the wider area.	
Significance	Negative high (51)	Negative low (24)
Can impacts be mitigated?	Yes. It is therefore important that all management actions and mitigation	
	measures included in section (f) of the EMPr. are implemented to ensure	
	that these impacts do not occur	

Increased consumption of water – Additional water requirements related to the portable water supply for employees and workers. Water will also be used for dust suppression.

According to the mine methodology water and sand will be pumped into the settling pond, please see below:

A floating barge, with a pump mounted on top, is used to pump the sand from the river bottom. Flexible floating pipes are connected to the pump, in order to transfer the sand from the river to the small "settling pond". The entrance to the pond is equipped with a sieve to ensure that only the fine sand enters the pond. The pond is also equipped with two water outflow pipes that ensures that the water flows back into the river, as soon as the sand has settled/deposited.

After the excess water has drained/flowed back into the river, the sand is removed from the settling pond and stockpiled at the demarcated stockpiling area. Here at the stockpiling area the sand will be left to dry. After the sand has dried, the sand is loaded and transported to the relevant client.

Increased consumption of water	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	Low (1)	Low (1)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Marginal loss of resources (2)	Marginal loss of resources (2)
Cumulative impact	Low cumulative impacts (2) - An additional demand on water sources could result	
	in a significant cumulative impact with regards to the availability of water.	
Significance	Negative Low (15)	Negative Low (15)
Can impacts be mitigated?	Yes, management actions and mitigation measures related to the use of water are	
	included in section (f) of the EMPr.	

Generation of waste –Workers will be present on site from 6:00 – 18:00, Monday to Saturday. Sources of general waste will be waste food, packaging, paper, etc. General waste will be stored on the site and removed on a weekly basis.

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating	
Status (positive or negative)	Negative	Negative	
Extent	Local (2)	Local (2)	
Probability	Definite (4)	Definite (4)	
Duration	Medium term (2)	Medium term (2)	
Magnitude	Medium (2)	Low (1)	
Reversibility	Barely reversible (3)	Partly reversible (2)	
Irreplaceable loss of resources	Marginal of resource (2) No loss of resource (1)		
Cumulative impact	Medium cumulative impact (3) - An additional demand for landfill space could		
	result in significant cumulative impacts with regards to the availability of		
	landfill space. If general waste is left on site livestock could mistakenly eat it,		
	which might in turn harm or kill them.		
Significance	Negative medium (32)	Negative low (14)	
Can impacts be mitigated?	Yes, management actions related to waste management are included in		
	section (f) of the EMPr.		

<u>Leakage of hazardous materials</u> - The proposed mining activity will make use of machinery that use fuel and oil. Leakage of
these oils and fuel can contaminate water supplies and must be prevented by constructing oil and diesel permeable bunds to
ensure that any spills are suitably attenuated and not released into the environment.

Leakage of hazardous materials	Pre-mitigation impact rating	Post mitigation impact rating	
Status (positive or negative)	Negative	Negative	
Extent	Local (2)	Site (1)	
Probability	Probable (3)	Possible (2)	
Duration	Long term (3)	Short term (1)	
Magnitude	Very high (3)	Medium (2)	
Reversibility	Barely reversible (3)	Partly reversible (2)	
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resource (2)	
Cumulative impact	High cumulative impacts (4) if impact occurs and not mitigated.		
Significance	Negative high (72 Negative low (24)		
Can impacts be mitigated?	Yes. It is therefore important that all management actions and mitigation		
	measures included in the section (f) of EMPr are implemented to ensure that		
	the <mark>se im</mark> pacts do not occur.		

<u>Noise disturbance</u> – Mining activities will result in the generation of noise over a period of 2-3 years. Sources of noise are likely to include vehicles, the use of machinery and people working on the site; but mining activities should be limited to normal working days and some Saturdays and hours (6:00 – 18:00).

Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss (2)	Marginal loss (2)

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

Cumulative impact	Medium cumulative impact (3).	
Significance	Negative low (26) Negative low (22)	
Can impacts be mitigated?	Yes, management actions related to noise pollution are included in section (f) of the EMPr.	

*Indirect impacts:* The operational phase will have an indirect negative impact through the change in the sense of place and an indirect positive impact through the provision of additional electrical infrastructure.

<u>Potential impact on tourism</u> – There are no tourist facilities in close proximity to the proposed area.

Potential impacts on tourism	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	N/A	N/A
Extent	N/A	N/A
Probability	N/A	N/A
Duration	N/A	N/A
Magnitude	N/A	N/A
Reversibility	N/A	N/A
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	N/A	
Significance	N/A	N/A
Can impacts be mitigated?	No mitigation required	

#### **DECOMMISIONING PHASE (MINE CLOSURE AND REHABILITATION)**

**Direct impacts:** Typically, the major social impacts associated with the decommissioning phase are linked to the loss of jobs and associated income. This has implications for the households who are directly affected, the communities within which they live. If infrastructures are removed after a 3/5 year period, the site will be returned to its natural state. Therefore, the physical environment will benefit from the closure of the mining area.

• Rehabilitation of the physical environment – The physical environment will benefit from the closure of the mining area. There is a slight chance to restore the site to its natural state, however rehabilitation will be done concurrently with all activities

Rehabilitation of the physical environment	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	High (3)
Reversibility	N/A	N/A
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	The impact would result in negli	gible to no cumulative effects (1)
Significance	Positive low (27)	Positive low (27)
Can impacts be mitigated?	No mitigation measures require	d.

• <u>Loss of employment</u> - The decommissioning of the facility has the potential to have a negative social impact on the local community.

Loss of employment	Pre-mitigation impact rating	Post mitigation impact rating	
Status (positive or negative)	Negative	Negative	
Extent	Local (2)	Local (2)	
Probability	Probable (3)	Probable (3)	
Duration	Permanent (4)	Permanent (4)	
Magnitude	Medium (2)	Medium (2)	
Reversibility	Irreversible (4)	Irreversible (4)	
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)	
Cumulative impact	Medium cumulative impacts (3)	Medium cumulative impacts (3)	
Significance	Negative medium (34)	Negative medium (34)	
Can impacts be mitigated?	The following mitigation measures	The following mitigation measures are recommended:	
		ure associated with the proposed	
	facility should be dismant decommissioning;	led and transported off-site on	
		should establish an Environmental	
		cover the costs of decommissioning	
	and rehabilitation of disturbed	areas.	

Indirect impacts: No indirect impacts are anticipated from the decommissioning phase of the proposed development

### vi) METHODOLOGY USED IN DETERMINING AND RANKING THE NATURE, SIGNIFICANCE, CONSEQUENCES, EXTENT, DURATION AND PROBABILITY OF POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS

#### Method of environmental assessment

The environmental assessment aims to identify the various possible environmental impacts that could results from the proposed development. Different impacts need to be evaluated in terms of its significance and in doing so highlight the most critical issues to be addressed.

Significance is determined through a synthesis of impact characteristics which include context and intensity of an impact. Context refers to the geographical scale i.e. site, local, national or global whereas intensity is defined by the severity of the impact e.g. the magnitude of deviation from background conditions, the size of the area affected, the duration of the impact and the overall probability of occurrence. Significance is calculated as shown in the Table below.

Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.

#### **Impact Rating System**

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the following project phases:

Construction

- Operation
- Decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact the following criteria is used:

Table: The rating system

	Table The raing System			
	NATURE			
Includ	de a brief description of the impac	t of environmental parameter being assessed in the context of the project. This criterion includes		
a brie	of written statement of the environr	mental aspect being impacted upon by a particular action or activity.		
		GEOGRAPHICAL EXTENT		
This i	s defined as the area over which t	he impact will be experienced.		
1	Site	The impact will only affect the site.		
2	Local/district	Will affect the local area or district.		
3	Province/region	Will affect the entire province or region.		
4	International and National	Will affect the entire country.		
		PROBABILITY		
This	describes the chance of occurrence	ee of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).		
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).		
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).		
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).		
	DURATION			
This	describes the duration of the impa	cts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes		
		in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period		
		of a relatively short construction period and a limited recovery time after construction,		
		thereafter it will be entirely negated (0 – 2 years).		
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated		
		by direct human action or by natural processes thereafter (2 – 10 years).		
3	Long term	The impact and its effects will continue or last for the entire operational life of the development,		
		but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).		
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process		
		will not occur in such a way or such a time span that the impact can be considered indefinite.		
	INTENSITY/ MAGNITUDE			
Desc	Describes the severity of an impact.			
2000				

1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely	
^	Mandiana	perceptible.	
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component	
		still continues to function in a moderately modified way and maintains general integrity (some	
		impact on integrity).	
3	High	Impact affects the continued viability of the system/ component and the quality, use, integrity	
		and functionality of the system or component is severely impaired and may temporarily cease.	
		High costs of rehabilitation and remediation.	
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity	
		and functionality of the system or component permanently ceases and is irreversibly impaired.	
		Rehabilitation and remediation often impossible. If possible rehabilitation and remediation	
		often unfeasible due to extremely high costs of rehabilitation and remediation.	
		REVERSIBILITY	
This	-	pact can be successfully reversed upon completion of the proposed activity.	
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.	
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.	
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.	
4	Irreversible	The impact is irreversible and no mitigation measures exist.	
	ITTCVCTSIBIC	The impact is inteversible and no marganon measures exist.	
		IRREPLACEABLE LOSS OF RESOURCES	
This	describes the degree to which resou	urces will be irreplaceably lost as a result of a proposed activity.	
1	No loss of resource	The impact will not result in the loss of any resources.	
2	Marginal loss of resource	The impact will result in marginal loss of resources.	
3	Significant loss of resources	The impact will result in significant loss of resources.	
4	Complete loss of resources	The impact is result in a complete loss of all resources.	
		CUMULATIVE EFFECT	
This	describes the cumulative effect of th	e impacts. A cumulative impact is an effect which in itself may not be significant but may become	
		tential impacts emanating from other similar or diverse activities as a result of the project activity	
-	estion.		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.	
'	140gligible cumulative impact	The impact would result in negligible to no cultulative ellects.	
2	Low cumulative impact	mpact The impact would result in insignificant cumulative effects.	
3	Medium cumulative impact	The impact would result in minor cumulative effects.	
4	High cumulative impact	The impact would result in significant cumulative effects	
		SIGNIFICANCE	
Signi	ificance is determined through a syr	thesis of impact characteristics. Significance is an indication of the importance of the impact in	
	modriso io dotorimilod timodgii d syl	of impact of an input of the impact in	

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:

(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.

		will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the acteristic which can be measured and assigned a significance rating.	
Points	Impact significance rating	Description	
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.	
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.	
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.	
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.	
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.	
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.	
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".	
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive effects.	

# THE POSITIVE AND NEGATIVE IMPACTS THAT THE PROPOSED ACTIVITY (IN TERMS OF THE INITIAL SITE LAYOUT) AND ALTERNATIVES WILL HAVE ON THE ENVIRONMENT AND THE COMMUNITY THAT MAY BE AFFECTED.

(Provide a discussion in terms of advantages and disadvantages of the initial site layout compared to alternative layout options to accommodate concerns raised by affected parties)

ACTIVITY	PHASE	POTENTIAL NEGATIVE IMPACTS
Site preparation Site Clearance, establishing construction area  Earthworks / sand pumped	Construction Operation Decommissioning  Construction	Physical destruction and disturbance of:  Biodiversity (Fauna & Flora)  Air pollution  Disturbing noise  Visual impacts  Riverbanks  Habitat loss and fragmentation  Noise pollution  Excavations & pumping sand from river
from river	Operation Decommissioning	<ul> <li>Disturbance of the riverbanks and riverbed</li> <li>Riverbed deepening and widening</li> <li>Riverbank, -bed and slope instability</li> <li>Increased erosion</li> <li>Habitat loss and fragmentation</li> <li>Riverbed coarsening</li> <li>Disturbance and killing of microorganism</li> <li>Reduces respiration and photosynthesis</li> <li>Reduced presence of benthic organisms</li> <li>Increases concentration of heavy metals</li> <li>Increases turbidity and total suspended solids</li> <li>Loss of soil resources and land capability</li> </ul>

		<ul> <li>Physical destruction and disturbance of biodiversity</li> <li>Possible pollution of surface water resources</li> <li>Possible alteration of natural drainage patterns</li> <li>Possible contamination of groundwater</li> <li>Air pollution</li> <li>Disturbing noise</li> <li>Visual impacts</li> <li>Noise pollution</li> </ul>
Civil works (if any)  Erection of structures, concrete work, steel work, electrical installation, establishing pipelines, settling pond	Construction Operation Decommissioning	Loss of mineral reserves     Hazardous structures/excavations/surface subsidence     Loss of soil resources and land capability     Possible pollution of surface water resources     Possible contamination of groundwater     Air pollution     Disturbing noise     Visual impacts
Sand mining Mining (Pumping), load, and hauling	Construction Operation	<ul> <li>Loss of mineral resources</li> <li>Loss of soil resources and land capability</li> <li>Physical destruction and disturbance of:</li> <li>Disturbance of the riverbanks and riverbed</li> <li>Riverbed deepening and widening</li> <li>Riverbank, -bed and slope instability</li> <li>Increased erosion</li> <li>Habitat loss and fragmentation</li> <li>Riverbed coarsening</li> <li>Disturbance and killing of microorganism</li> <li>Reduces respiration and photosynthesis</li> <li>Reduced presence of benthic organisms</li> <li>Biodiversity within the river</li> <li>Noise impact</li> <li>Increases concentration of heavy metals</li> <li>Increases turbidity and total suspended solids</li> <li>Air pollution</li> <li>Disturbing noise</li> <li>Visual impacts</li> <li>Possible pollution of surface water resources</li> <li>Possible contamination of groundwater</li> </ul>
Sand management Storage, stockpile or final disposal	Operation Decommissioning Closure (final landform)	<ul> <li>Loss of soil resources and land capability</li> <li>Disturbance of biodiversity</li> <li>Possible pollution of surface water resources</li> <li>Possible contamination of groundwater</li> <li>Air pollution</li> <li>Disturbing noise</li> <li>Negative landscape and visual impact</li> </ul>
Dirty water management Collection, storage of dirty water for re-use,recycling	Construction Operation Decommissioning	<ul> <li>Possible pollution of surface water resources</li> <li>Possible contamination of groundwater</li> <li>Disturbing noise</li> </ul>

Stormwater management Stormwater channels and berms, collection of dirty water, storage for re-use Transport systems Use of access points, road transport to and from site for employees and supplies, movement within site boundary (haul roads, conveyors, pipelines), taxi	Construction Operation Decommissioning  Construction Operation Decommissioning	<ul> <li>Possible alteration of drainage patterns</li> <li>Possible pollution of surface water resources</li> <li>Possible contamination of groundwater</li> <li>Disturbance of biodiversity</li> <li>Noise</li> <li>Traffic impacts</li> <li>Visual impacts</li> </ul>
areas Storage and maintenance	Construction	Possible pollution of surface water resources
services/ facilities Washing vehicles and machinery, storage and handling non-process materials	Operation Decommissioning	<ul> <li>Possible contamination of groundwater resulting from hydrocarbon spills and soil erosion</li> <li>Disturbing noise</li> </ul>
Demolition Dismantling, demolition,removal of equipment	Operation (as partof maintenance) Decommissioning	<ul> <li>Hazardous structures (e.g., fuel tanks)</li> <li>Loss of soil resources and land capability</li> <li>Disturbance of biodiversity</li> <li>Water pollution</li> <li>Air pollution</li> <li>Disturbing noise</li> <li>Visual impacts</li> </ul>
Non-mineralized waste management Transportation of waste materials to waste facility	Construction Operation Decommissioning Closure (limited)	
Rehabilitation Replacing soil, slope stabilization, landscaping, revegetation, riverbanks	Construction Operation Decommissioning Closure	<ul> <li>Disturbance of biodiversity</li> <li>Alteration of natural drainage patterns</li> <li>Contamination of groundwater</li> <li>Air pollution</li> <li>Visual impacts</li> <li>Rehabilitate the banks</li> </ul>
ACTIVITY	PHASE	POTENTIAL POSITIVE IMPACTS
Job creation	Construction, Operation	Temporary employment and other economic benefits
Maintenance and aftercare Inspection and maintenance and machinery remaining facilities and rehabilitated areas	Closure	Re-establishment of biodiversity

#### viii) 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).

POTENTIAL IMPACT	POSSIBLE MITIGATION MEASURES	
Influx of persons (job seekers)	Establish and maintain site security measures	
	Control site and facility access	
Hazardous waste pollution	Implement hazardous waste, dirty water and mineralised and non-mineralised waste	
Loss of soil resources and land	management procedures     Implementation of a soil management plan	
capability through physical	Limit disturbance of soil to what is necessary	
disturbance	Stripping, storing, maintenance and replacement of topsoil in accordancewith soil	
	management procedures	
Physical destruction or	Implement a biodiversity management plan	
disturbance of biodiversity	Restrict project footprint	
	Provide alternative habitat (where appropriate and necessary)	
	Implement a monitoring programme	
	Rehabilitate disturbed areas	
	Prevention of the killing of animal species and harvesting of plant species    Implementation of dust control management   Implementation of dust con	
	<ul> <li>Implementation of dust control measures</li> <li>Pollution prevention measures (water, soil etc.)</li> </ul>	
	<ul> <li>Pollution prevention measures (water, soil etc.)</li> <li>Prevention of the disturbance of ecosystems as far as possible.</li> </ul>	
	Rehabilitated the riverbanks and slope.	
	Erosion control measure	
Surface water pollution	Appropriate design of polluting facilities and pollution prevention facilities	
	Implement and maintain stormwater controls that meet regulatory requirements	
	<ul> <li>Implement a monitoring programme (water use, process water quality, rainfall-related</li> </ul>	
	discharge quality)	
	Implement emergency response	
	Authorise all water uses as defined in the NWA	
	Regularly service the sand pump	
Groundwater contamination	<ul> <li>Appropriate design of polluting facilities (by qualified person)</li> </ul>	
	<ul> <li>Correct handling of hazardous wastes, mineralised and non-mineralised wastes</li> </ul>	
	Compensation for loss	
_	Implementation of a monitoring programme	
Dewatering	<ul> <li>Authorise all water uses as defined in the NWA Compliance with relevant license requirements</li> </ul>	
Air pollution	Implementation of air quality management plan	
	Implementation of an air quality monitoring plan	
	Control dust plumes	
	Implementation of an air complaints procedure	
	Maintenance of abatement equipmentImplement an emergency response	
Noise pollution	Maintenance of equipment and machinery in good working order	
	Equip machinery with silencers	
	Construction of noise attenuation measures	
	Implementation of noise monitoring programme	
Visual impacts	Limit the clearing of vegetation as far as possible	
	Limit the emissions of visual dust plumes	

	Use of screening berms Concurrent rehabilitation
	Painting infrastructure to compliment the surrounding environmentImplementation of a
	closure plan
	Management through care and aftercare
Traffic increases	Implement speed allaying measures where appropriate, e.g. speed humps where necessary
	Education and awareness training of workers
	Enforce strict speed limits on mine access roads
Heritage andcultural	Avoid heritage and cultural resources as far as practically possible
	Apply for the relevant permits to remove or destroy heritage sites (ifapplicable)
	Exhumation and relocation of graves according to legal requirements (ifapplicable)
	Mark remaining heritage sites on plan
Economic impact	Hire people from closest communities as far as practically possible
	<ul> <li>Local procurement of goods and services as far as practically possible</li> </ul>
	Compensation for loss of land use
	<ul> <li>Closure planning will consider skills, economic consideration and the needs of future farming</li> </ul>
Land uses	Implementation of EMPr commitments that focus on environmental and socialimpacts
	Take necessary steps to prevent negative impact on surrounding land
	Compensation for loss
	Closure planning to incorporate measures to achieve future land use plans
River	Rehabilitated the riverbanks and slope.
	Erosion control measure
	Stormwater management

#### ix) MOTIVATION WHERE NO ALTERNATIVE SITES WERE CONSIDERED.

As discussed in the previous section, the possibility to encounter further Sand (QY) on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province, was identified.

## x) STATEMENT MOTIVATING THE ALTERNATIVE DEVELOPMENT LOCATION WITHIN THE OVERALL SITE. (Provide a statement motivating the final site layout that is proposed)

The site is preferred due to its possibility of having Sand (QY) the property is also only suitable for potential grazing and cultivation, due to the climate conditions.

- I) 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.
  - i. A description of all environmental issues and risks that are identified during the environmental impact assessment process

# Process for the identification of key issues

The methodology for the identification of key issues aims, as far as possible, to provide a user-friendly analysis of information to allow for easy interpretation.

- <u>Checklist</u>: The checklist consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts.
- Matrix: The matrix analysis provides a holistic indication of the relationship and interaction between the various activities, development phases and the impact thereof on the environment. The method aims at providing a first order cause and effect relationship between the environment and the proposed activity. The matrix is designed to indicate the relationship between the different stressors and receptors which leads to specific impacts. The matrix also indicates the specialist studies, which will be submitted as part of the Environmental Impact Report in order to address the potentially most significant impacts.

# **Checklist analysis**

The site visit was conducted to ensure a proper analysis of the site specific characteristics of the study area. The table below provides a checklist, which is designed to stimulate thought regarding possible consequences of specific actions and so assist scoping of key issues. It consists of a list of structured questions related to the environmental parameters and specific human actions. They assist in ordering thinking, data collection, presentation and alert against the omission of possible impacts. The table highlights certain issues, which are further analysed in matrix format.

Table: Environmental checklist

QUESTION	YES	NO	Un- sure	Description					
1. Are any of the following located on the site earmarked for the development?									
I. A river, stream, dam or wetland	×			The majority of the proposed 5ha area falls within the Crocodile River.					
II. A conservation or open space area		×		None.					
III. An area that is of cultural importance			×	According to the DFFE Screening Report the area falls within low Archaeological and Cultural Heritage Theme Sensitivity ( <b>Appendix 7</b> ).					
IV. Site of geological significance			×	According to the DFFE Screening Report the proposed area falls within High Paleontology Theme Sensitivity (Appendix 7).					
V. Areas of outstanding natural beauty	×								
VI. Highly productive agricultural land		×		According to the Land Capability map the proposed area falls within Land in Class IV (4). The proposed area is natural and mostly within the Crocodile River.					
VII. Floodplain		×		According to the wetland areas map the proposed 5ha area falls within a Floodplain wetland.					

VIII. Indigenous forest			×	According to the Land use map the proposed area is mostly covered in Woodland/Open bush.
IX. Grass land			×	According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.  Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.
X. Bird nesting sites		×		According to the Important Bird Areas map (Appendix 7) the proposed area does not fall within an Important Bird Area (IBAs). However, it is near the Northern Turf Thornveld which is an IBA area.
XI. Red data species			×	
XII. Tourist resort		×		None.
2. Will the project potentially result	in potenti	al?		
I. Removal of people		×		None.
II. Visual Impacts	×			The visual impact will be managed
III. Noise pollution	×			The noise impact will be limited to working hours.
IV. Construction of an access road		×		Access will be obtained from existing gravel roads
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.		×		
VI. Accumulation of large workforce (>50 manual workers) into the site.		×		Employment opportunities will be created during the construction and operational phase of the project.
VII. Utilisation of significant volumes of local raw materials such as water, wood etc.		×		Sand will only be pumped from the river bottom to a small settling pond. The pond is also equipped with two water outflow pipes that ensures that the water flows back into the river.
VIII. Job creation	×			Employment opportunities will be created during the construction and operational phase of the project.
IX. Traffic generation			×	May be created when hauling the sand the various buyers.
X. Soil erosion	×			Erosion must be managed.
XI. Installation of additional bulk telecommunication transmission lines or facilities		×		None.
3. Is the proposed project located n	ear the fo	llowing?		

I. A river, stream, dam or wetland	×			The Crocodile River passes through the proposed 5ha area.
II. A conservation or open space area		×		None.
III. An area that is of cultural importance			×	According to the DFFE Screening Report the surrounding area falls within low Archaeological and Cultural Heritage Theme Sensitivity (Appendix 7).
IV. A site of geological significance			×	According to the DFFE Screening Report the surrounding area falls within High and mMedium Paleontology Theme Sensitivity ( <b>Appendix 7</b> ).
V. An area of outstanding natural beauty	×			
VI. Highly productive agricultural land			×	According to the Land Capability map the proposed area and surrounding area also falls within Land in Class IV (4), III (3) and VIII (8). In the surrounding area there are agricultural fields under central pivots irrigation.
VII. A tourist resort		×		None.
VIII. A formal or informal settlement	×			The town of Thabazimbi is approximately 8km North of the proposed area.

# Matrix analysis

The matrix describes the relevant listed activities, the aspects of the development that will apply to the specific listed activity, a description of the environmental issues and potential impacts, the significance and magnitude of the potential impacts, and the mitigation of the potential impacts. The matrix also highlights areas of particular concern, which requires more in depth assessment. Each cell is evaluated individually in terms of the nature of the impact, duration and its significance – should no mitigation measures be applied. This is important since many impacts would not be considered insignificant if proper mitigation measures were implemented. The matrix also provides an indication if mitigation measures are available.

In order to conceptualise the different impacts the matrix specify the following:

• Stressor: Indicates the aspect of the proposed activity, which initiates and cause impacts on

elements of the environment.

• Receptor:

the stressor.

• Impacts: Indicates the net result of the cause-effect between the stressor and receptor.

• **Mitigation**: Impacts need to be mitigated to minimise the effect on the environment.

# J) AN ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK

LISTED ACTIVITY	ASPECTS OF THE DEVELOPMENT		POTENTIAL IMPACTS			NCE AND M		MITIGATION OF POTENTIAL IMPACTS	SPECIALIST STUDIES /		
(The Stressor)	/ACTIVITY		Receptors	Impact description		Minor	Major	Duration	Possible Mitigation	INFORMATION	
				С	ONSTRUCTION PHASE			•			
Listing Notice 1, (GNR 327), Activity 19: The infilling or depositing of any material of more than 10 cubic metres into, or	Site clearing and preparation		Fauna & Flora		Loss or fragmentation of indigenous natural vegetation. Loss of sensitive species.	-		S	Yes	-	
the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;	Areas earmarked for settling pond will need to be cleared, topsoil will be		Air	•	Loss or fragmentation of habitats.  Air pollution due to the increase of traffic.	-		M	Yes	-	
Listing Notice 1 (GNR 327) as amended (GNR 517), Activity	stockpiled separately.	IENT	Soil		Dust from mining/prospecting activities  Soil degradation, including erosion.  Loss of topsoil.	-	_	S	Yes		
<b>21:</b> "Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other		ENVIRONMENT	Geology		Disturbance of soils and existing land use (soil compaction).  It is not foreseen that the removal of indigenous vegetation will			0			
applicable activity as contained in this Listing Notice on in Listing Notice 3 of 2014, required to exercise the mining permit"		ICAL EN	Existing services		impact on the geology or vice versa.  Generation of waste that need to be accommodated at a	-		S	Yes	-	
Listing Notice 1 (GNR 327), Activity 27: "The clearance of an area of 1 hectares or more, but less than 20 hectares of		BIOPHYSICAL	infrastructure	•	licensed landfill site.  Generation of sewage that need to be accommodated by the local sewage plant.	-		S	Yes	-	
indigenous vegetation."			Ground water	•	Pollution due to construction vehicles.	-		S	Yes	-	
Listing Notice 3 GNR 324, Activity 12: The clearance of an area of 300 square metres or more of indigenous vegetation; (e)  Limpopo (ii) Within critical biodiversity areas identified in			Surface water		Increase in storm water run-off.  Pollution of water sources due to soil erosion.  Destruction of watercourses (River/pans/dams/streams/wetlands).	-		S	Yes	-	
systematic biodiversity plans adopted by the competent authority  Listing Notice 3 GNR 324, Activity 14: The development of infrastructure or structures with a physical footprint of 10 square			Local unemployment rate	•	Job creation. Business opportunities. Skills development.	+		S	Yes	-	
metres or more; where such development occurs (a) within a watercourse (c) if no development setback has been adopted,		NMENT	Visual landscape	•	Potential visual impact on residents of farmsteads and motorists in close proximity to proposed facility.	-		L	Yes	-	
within 32metres of a watercourse <b>(e) Limpopo</b> (i) Outside urban areas: (ff) Critical Biodiversity areas (hh) Areas within 10		VIRC	Traffic volumes	•	Increase in construction vehicles.	-		S	Yes	-	
kilometres from a protected areas identified in terms of NEMPAA.		SOCIAL/ECONOMIC ENVIRONMENT	NOMIC ENV	Health & Safety	•	Air/dust pollution. Road safety. Increased risk of veld fires.	-		S	Yes	-
		SOCIAL/EC(	Noise levels	•	The generation of noise as a result of construction vehicles, the use of machinery such as drills, excavators, dumper trucks, people working on the site, etc.	-		L	Yes	-	
		_	Tourism industry	•	Since there are no tourism facilities in close proximity to the site, the construction activities will not have an impact on tourism in the area.	N/A	N/A	N/A	N/A	-	

	Heritage resources	<ul> <li>Removal or destruction of archaeological and/or paleontological sites.</li> <li>Removal or destruction of buildings, structures, places and equipment of cultural significance.</li> <li>Removal or destruction of graves, cemeteries and burial grounds.</li> </ul> OPERATIONAL PHASE	-		L	Yes	-
The key components of the proposed project are described below:  • Supporting Infrastructure  - A control facility with basic services such as	Fauna & Flora	<ul> <li>Fragmentation and loss of habitats.</li> <li>Smothered microorganisms</li> <li>Reduced respiration and photosynthesis.</li> <li>Reduced presence of benthic organisms</li> <li>Establishment and spread of declared weeds and alien invader plants (operations).</li> </ul>		-	L	Yes	-
water and electricity will be constructed on the site and will have an approximate footprint	Air quality Soil	<ul> <li>Air pollution due to the mining / prospecting activity and transport of the gravel to the designated areas.</li> <li>Soil degradation, including erosion.</li> <li>Disturbance of soils and existing land use (soil compaction).</li> <li>Loss of agricultural potential (low significance relative to</li> </ul>	-		S L	Yes	-
50m² or less. Other supporting infrastructure includes a site office and workshop area.  • Roads – Access will be obtained from existing gravel and tar roads off the R510 and R511 roads.	Geology  Existing services	Collapsible soil. Seepage (shallow water table).  Active soil (high soil heave). Erodible soil. The presence of undermined ground. Instability due to soluble rock. Steep slopes or areas of unstable natural slopes. Areas subject to flooding.	-		L	Yes	-
• Fencing - For health, safety and security reasons, the facility will be required to be fenced	infrastructure HASICAL	<ul> <li>Generation of waste that need to be accommodated at a licensed landfill site.</li> <li>Generation of sewage that need to be accommodated by the municipal sewerage system and the local sewage plant.</li> <li>Increased consumption of water, dust suppression.</li> </ul>	-		L	Yes	-
off from the surrounding farm.	Ground water	Leakage of hazardous materials. The machinery on site requires oils and fuel to function. Leakage of these oils and fuels can contaminate water supplies.		-	L	Yes	-
	Surface water	<ul> <li>Increase in storm water runoff. The development will potentially result in an increase in storm water run-off that needs to be managed to prevent soil erosion.</li> <li>Destruction of watercourses (River/pans/dams/streams/wetlands).</li> <li>Leakage of hazardous materials. The machinery on site require oils and fuel to function. Leakage of these oils and fuels can contaminate water supplies.</li> <li>Riverbed Coarsening</li> <li>Riverbed widening and deepening</li> <li>Riverbank, -bed, and slop instability</li> <li>Altered hydrological table.</li> <li>Increased turbidity and total suspended solids</li> <li>Increased concentrations f heavy metals</li> </ul>			L	Yes	-

		Ι			ı	ı		
		Local unemployment rate	<ul> <li>Job creation. Security guards will be required for 24 hours every day of the week.</li> <li>Skills development.</li> </ul>	+		L	Yes	-
	NMENT	Visual landscape	The proposed 5ha area is not used for any agriculture related activities.	-		L	Yes	-
	/IRO	Traffic volumes	Increase in vehicles collecting gravel for distribution.	-		S	Yes	-
	EN H	Health & Safety	Air/dust pollution.			0	V .	
	MIC I		Road safety.	-		S	Yes	-
	ECONO	Noise levels	The proposed development will result in noise pollution during the operational phase.	-		М	Yes	-
	SOCIAL/ECONOMIC ENVIRONMENT	Tourism industry	Since there are tourism facilities in close proximity to the site, the decommissioning activities may have an impact on tourism in the area.	N/A	N/A	N/A	N/A	-
		Heritage resources	It is not foreseen that the proposed activity will impact on heritage resources or vice versa.	N/A	N/A	N/A	N/A	-
			DECOMMISSIONING PHASE					
Du Mir	ne closure uring the mine closure the ne and its associated	Fauna & Flora	<ul> <li>Re-vegetation of exposed soil surfaces to ensure no erosion in these areas.</li> <li>Stabilise riverbanks and slopes</li> </ul>	+		L	Yes	-
	rastructure will be smantled.	Air quality	Air pollution due to the increase of traffic of construction vehicles.	-		S	Yes	-
bio	ehabilitation of Dephysical environment	Soil	<ul> <li>Backfilling of all voids</li> <li>Placing of topsoil on backfilled area</li> <li>Sloping of the settling pond if necessary</li> </ul>	+		L	Yes	-
env	vironment will be habilitated.	Geology	<ul> <li>It is not foreseen that the decommissioning phase will impact on the geology of the site or vice versa.</li> </ul>	N/A	N/A	N/A	N/A	-
	ehabilitation of ophysical environment e biophysical vironment will be nabilitated.  BIODHASICAL ENVIRONMENT	Existing services infrastructure	<ul> <li>Generation of waste that need to be accommodated at the local landfill site.</li> <li>Generation of sewage that need to be accommodated by the municipal sewerage system and the local sewage plant.</li> <li>Increase in construction vehicles.</li> </ul>	-		S	Yes	-
		Ground water	Pollution due to construction vehicles.	-		S	Yes	-
		Surface water	<ul> <li>Increase in storm water run-off.</li> <li>Pollution of water sources due to soil erosion.</li> <li>Destruction of watercourses         (River/pans/dams/streams/wetlands).     </li> </ul>	-		S	Yes	-
		Local unemployment rate	Loss of employment.	-		L	Yes	-
	OMIC	Visual landscape	Potential visual impact on visual receptors in close proximity to proposed facility.	-		S	Yes	-
	CON	Traffic volumes	Increase in construction vehicles.	-		S	Yes	-
	SOCIAL/ECONOMIC	Health & Safety	<ul> <li>Air/dust pollution.</li> <li>Road safety.</li> <li>Increased crime levels. The presence of mine workers on the site may increase security risks associated with an increase in crime levels as a result of influx of people in the rural area.</li> </ul>	-		L	Yes	-

Noise levels	The generation of noise as a result of construction vehicles, the use of machinery and people working on the site.	-		S	Yes	-
Tourism industry	Since there are no tourism facilities in close proximity to the site, the decommissioning activities will not have an impact on tourism in the area.		N/A	N/A	N/A	-
Heritage resources	It is not foreseen that the decommissioning phase will impact on any heritage resources.	-		L	Yes	-

(N/A) No impact (+) Positive Impact (-) Negative Impact (S) Short Term (M) Medium Term (L) Long Term



K) WHERE APPLICABLE, A SUMMARY OF THE FINDINGS AND IMPACTS MANAGEMENT MEASURES IDENTIFIED IN AN SPECIALIST REPORT COMPLYING WITH APPENDIX 6 OF THESE REGULATIONS AND AN INDICATION AS TO HOW THESE FINDINGS AND RECOMMENDATIONS HAVE BEEN INCLUDED IN THE FINAL REPORT.

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X where applicable)	SPECIALIST
		х	

According to the DFFE Screening Report the Environmental Sensitivity of the proposed area is as follows:

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme			X	
Animal Species Theme		Х		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme		X		
Plant Species Theme				X
Terrestrial Biodiversity Theme	X			

-	study according to DEA Screening tool	Response
Agriculture Im	pact Assessment	According to the DFFE Screening Report the Agriculture theme sensitivity of the proposed 5ha area fall within medium sensitivity.  The land capability for the proposed area falls within Land in Class IV (4).  Since the proposed 5ha area falls mostly within the Crocodile River we do not see a need for this study.
	Animal Species Assessment Aquatic Biodiversity	According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.
Biodiversity study	Impact Assessment  Plant Species Assessment	Please see <b>figure 24</b> (photos) how the proposed <b>area looks</b> like and the <b>plates</b> under <b>Appendix 8</b> for the rest of the photos.  The applicant is in the process of applying for a Water Use License,
	Terrestrial Biodiversity Impact Assessment	All infrastructure will be temporary and/or mobile.  In the Environmental Management Programme there are mitigation measure provided.
Archaeologica Impact Assess	al and Cultural Heritage sment	<ul> <li>DEA Screening Report findings:         <ul> <li>Paleontology Theme Sensitivity: High sensitivity</li> <li>Archaeological and Cultural Heritage Theme Sensitivity: Low Sensitivity</li> </ul> </li> <li>If anything of Archaeological and/or paleontological significance is found during the construction and operational phase of the mine the following applies:         <ul> <li>NHRA 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</li> </ul> </li> </ul>
Palaeontology Impact Assessment		<ul> <li>NHRA 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</li> <li>NHRA 38(4)e – The following conditions apply with regards to the appointment of specialists: i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as</li> </ul>

	soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
	If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the <b>Chance Find Protocol</b> must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.
	<ul> <li>Chance Find Procedure</li> <li>If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.</li> <li>The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.</li> <li>A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.</li> <li>Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.</li> </ul>
	<ul> <li>Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.</li> <li>The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.</li> </ul>
	<ul> <li>In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.</li> <li>Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.</li> </ul>
Noise Impact Assessment	We do not see the need for this study as there is an existing mine adjacent the proposed area and the nearest homestead is approximately 900m East from the proposed area.
Radioactivity Impact Assessment	This study is not necessary since the process of mining Stone Aggregate does not have any radioactive effects.

#### L) ENVIRONMENTAL IMPACT STATEMENT

# SUMMARY OF THE KEY FINDINGS

This section provides a summary of the assessment and conclusions drawn from the proposed mining area. In doing so, it draws on the information gathered as part of the environmental impact assessment process and the knowledge gained by the environmental consultant during the course of the process and presents an informed opinion on the environmental impacts associated with the proposed project. The following conclusions can be drawn for the proposed mining activity:

Potential impacts on biodiversity: It is expected that some vegetation might be lost but through implementing mitigation measures, no adverse impacts are expected.

According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.

Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

#### **DEA Screening Report findings:**

- Plant Species theme sensitivity: Low sensitivity
- Aquatic Biodiversity sensitivity: Very High sensitivity
- Terrestrial Biodiversity sensitivity: Very High sensitivity.
- Animal Species sensitivity: High and Medium sensitivity
- Potential impact on Archaeological artifacts and Palaeontological resources: Should archaeological sites or graves be exposed during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.

# **DEA Screening Report findings:**

- Paleontology Theme Sensitivity: High sensitivity
- Archaeological and Cultural Heritage Theme Sensitivity: Low Sensitivity

If anything of Archaeological and/or paleontological significance is found during the construction and operational phase of the mine the following applies:

- NHRA 38(4)c(i) If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)e The following conditions apply with regards to the appointment of specialists: i) If heritage resources
  are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on
  the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly

discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.

#### **Chance Find Procedure**

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the
  following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth
  and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. No attempt should be made to remove material from
  their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage
  agency will also be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.
- Potential impacts on land use: A certain portion of the proposed area was previously used for cultivation, but not anymore.

According to Figure 21 the proposed 5ha area falls within natural land cover. According to Figure 22 the proposed 5ha area is covered by Thicket / Dense Bush, Woodland / Open bush, Wetland, Grassland and Bare non vegetation. The google earth map (Figure 23) shows the proposed area is partially within the Krokodile river. The maps below are available under Appendix 5.

Please see figure 24 (photos) how the proposed area looks like and the plates under Appendix 8 for the rest of the photos.

The applicant is in the process of applying for a Water Use License,

All infrastructure will be temporary and/or mobile.

Potential social impacts: The presence of construction workers poses a potential risk to family structures and social networks. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on local communities. The most significant negative impact is associated with the disruption of existing family structures and social networks. > Potential negative impacts: (noise, dust, soil degradation, storm water, traffic, health and safety) associated with the operation of the facility are expected to be of low-high impact, of medium terms and site specific. These can be mitigated or negated through the implementation of practical and appropriate mitigation measures.

Positive impacts: The mining of Sand (QY) may result in socio-economic benefit to the area.

All possible negative impacts and risks that have been identified in this report can be effectively mitigated and managed by implementing the migratory measures as set out in the Environmental Management Programme (EMPr) attached in Part B.

#### ii) 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.

Refer to Locality Map attached in Appendix 4.

# iii) SUMMARY OF THE POSITIVE AND NEGATIVE IMPLICATIONS AND RISKS OF THE PROPOSED ACTIVITY AND IDENTIFIED ALTERNATIVES

- Increased noise levels
- Potential water and soil pollution impacts.
- Potential loss of fauna and flora.
- Fragmentation and loss of Habitat
- Smothering of Microorganisms in the river
- Reduced presence of benthic organisms
- Riverbed coarsening
- Altered hydrological table
- Instability of riverbed, bank and slope
- Deepening and widening of Riverbed
- Increased turbidity and total suspended solids in the river.
- Increased concentration of heavy metals in the river.
- Increased vehicle activity.
- Increased dust levels.
- Increase in water consumption
- Potential visual impacts.

All possible negative impacts and risks that have been identified in this report can be effectively mitigated and managed by implementing the mitigation measures as set out in the Environmental Management Programme (EMPr) attached in Part B.

M) 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)

Management objectives include:

- Ensure that the mining activity does not cause pollution to the environment or harm to persons.
- Minimise production of waste.
- All mining activities must be conducted in a manner that minimises noise impact, litter, environmental degradation and health hazards i.e. injuries.
- The mine must be kept neat and tidy during waste handling to prevent unsightliness and accidents.

Expected outcomes include:

- Minimum impacts on the environment as a result of mining.
- Compliance with legislative requirements.
- Mine is neat and tidy and well managed.

#### FINAL PROPOSED ALTERNATIVES

(Provide an explanation for the final layout of the infrastructure and activities on the overall site as shown on the final site map together with the reasons why they are the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment)

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. Due to the expected mineral resources, **Impulse Mining (Pty)** Ltd would like to potentially mine for Sand (QY). including associated infrastructure, structure and earthworks on certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province, therefore there will be no other alternative (i.e. to facilitate the movement of machinery, equipment, infrastructure).

#### N) ASPECTS FOR INCLUSION AS CONDITIONS OF AUTHORISATION.

Any aspects which have not formed part of the EMPr that must be made conditions of the Environmental Authorisation

- The operational activities and relevant rehabilitation of disturbed areas should be monitored against the improved EMPr and all other relevant environmental legislation.
- A copy of the EMP should be made available onsite at all times.
- Implementation of the proposed mitigation measures set out in the EMPr.

# O) DESCRIPTION OF ANY ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE. (Which relate to the assessment and mitigation measures proposed)

The uncertainties in results are mostly related to the availability of information, time available to gather the relevant information as well as the sometimes-subjective nature of the assessment methodology. If the authority feels that more specialists' studies need to be conducted, such will be corresponded to the applicant.

# P) REASONED OPINION AS TO WHETHER THE PROPOSED ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED

# Reasons why the activity should be authorized or not.

Based on the outcomes of the current Mining activities in the area the possibility to encounter high amounts of river sand, were identified.

The option of not approving the activities will result in a significant loss of possible valuable minerals being exploited. And all economic benefits will be lost.

# Q) CONDITIONS THAT MUST BE INCLUDED IN THE AUTHORISATION

- > The operational activities and relevant rehabilitation of disturbed areas should be monitored against the improved EMPr and all other relevant environmental legislation.
- A copy of the EMP should be made available onsite at all times.
- Implementation of the proposed mitigation measures set out in the EMPr.

The EMPr should be binding on all managers and contractors operating/utilizing the site.

Period for which the Environmental Authorisation is required.

For a minimum of 3 years.

#### R) 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 undertaking required to meet the requirements of this section is provided at the end of the EMPr and is applicable to both the Environmental Impact Assessment report and the Environmental Management Programme report.

I, Lizanne Esterhuizen (EAP) herewith confirms

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- 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;
- **D.** the acceptability of the project in relation to the finding of the assessment and level of mitigation proposed;

Signature of the environmental assessment practitioner:	
Milnex CC	
Name of company:	
06/08/2022	
Date:	

# S) FINANCIAL PROVISION

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

XXXXX

i) Explain how the aforesaid amount was derived.

The closure cost estimate provided above aligned with the Financial Provisioning Regulations, 2015. The amount was calculated by Milnex CC. The amount was calculated by Milnex CC.

ii) 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).

# **Financial Guarantee**

The financial guarantee for the rehabilitation for land disturbed by **Impulse Mining (Pty)** Ltd submitted together with the application for a mining permit.

# **Rehabilitation Fund**

Impulse Mining (Pty) Ltd will also make provision for rehabilitation during closure by establishing a rehabilitation trust.

iii) Motivation for the deviation.

Not applicable

T) OTHER INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

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:

i. 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 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 Appendix 2.19.1 and confirm that the applicable mitigation is reflected in 2.5.3; 2.11.6.and 2.12. herein).

The following impacts may be regarded as community impacts:

- Increased noise levels
- Potential water and soil pollution impacts.
- Potential loss of fauna and flora.
- Increased vehicle activity.
- Increased dust levels.
- Increase in water consumption
- Potential visual impacts.

Indirect socio-economic benefits are expected to be associated with the creation of employment.

ii. 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 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).

# **DEA Screening Report findings:**

- Paleontology Theme Sensitivity: High sensitivity
- Archaeological and Cultural Heritage Theme Sensitivity: Low Sensitivity

Cultural Heritage in South Africa (includes all heritage resources) is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). According to Section 3 of the Act, all Heritage resources include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

If such resources are found during the mining or development activities, they shall not be disturbed without a permit from the relevant heritage resource Authority, which means that before such sites are disturbed by development it is incumbent on the developer to ensure that a heritage impact assessment is done and the Provincial Heritage Resources Authority and SAHRA must be contacted immediately and work must stop.

If anything of Archaeological and/or paleontological significance is found during the construction and operational phase of the mine the following applies:

- NHRA 38(4)c(i) If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)c(ii) If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- NHRA 38(4)e The following conditions apply with regards to the appointment of specialists: i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the **Chance Find Protocol** must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.

#### **Chance Find Procedure**

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report
  the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the
  relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111
  Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21

- 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. No attempt should be made to remove material from
  their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage
  agency will also be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.

# U) 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 4).

From a local perspective, the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province, is preferred because the geological formation supports the possibility that the minerals applied for could be found on the proposed area.

#### **PART B**

#### **ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT**

1) Draft environmental management programme.

# A) DETAILS OF THE EAP

- i) The EAP who prepared the report
- ii) Expertise of the EAP

NAME OF PRACTITIONER	QUALIFICATIONS	CONTACT DETAILS
Lizanne Esterhuizen	Honours Degree in Environmental Science (refer to <b>Appendix 1</b> )	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: lizanne@milnex-sa.co.za

B) 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).

It is hereby confirmed that the requirements to describe the aspects of the activity that are required by the EMP is already included in Part A, section 1(h).

# C) 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 any areas that should be avoided, including buffers)

Refer to Locality Map, attached as Appendix 4.

# D) DESCRIPTION OF IMPACT MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENTS

i. **Determination of closure objectives.** (ensure that the closure objectives are informed by the type of environment described in 2.4 herein)

The overall goal for closure of the 5ha mining site is to do concurrent rehabilitation to avoid damming of water in the excavations/settling pond, ensuring that the land is stable and safe in the long-term. For post closure, the tranches will be shaped and rehabilitated and proposed future use after mining will be agricultural & Livestock/game grazing use. Closure objectives relate to the following:

#### PHYSICAL STABILITY: To level and shape excavations.

To this end the decommissioning and rehabilitation of all infrastructure areas will follow the following principles:

- All vehicles, plant (if any) and workshop equipment will be removed for salvage or resale.
- All fixed assets that can be profitably removed will be removed for salvage or resale
- All structures will be demolished, and foundations removed if they will not be used for any purpose
- The excavations/settling pond will be filled in with soil, the top 100 mm being topsoil (from stockpiles);
- Roads will be rehabilitated.
- All disturbed and exposed surfaces will be covered with at least 100 mm of topsoil and re-vegetation must be allowed to take place naturally.
- Water quality will be monitored until it reaches a steady state or for two years after closure.

- Dismantle and remove redundant fence for salvage.
- All services such as the water supply line and the power line will be demolished only for the section on the mine's property if there will be no use for them post mining.

#### SUBMISSION OF INFORMATION

- All facilities that become redundant during the life of the mine must be rehabilitated concurrently to lighten the rehabilitation process at the end of the mine's life;
- Attention must be paid to the latest developments in the mine rehabilitation
- The mine closure plan must always keep pace with the current best practices so it must bereviewed every three years; and
- All information as required by the various government departments should be captured and be readily available for submission when required.

#### **MAINTENANCE**

The necessary agreements and arrangement will be made by **Impulse Mining (Pty) Ltd** to ensure that all natural physical, chemical and biological processes for which a closure condition have been specified are monitored until they reach a steady state or for two years after closure or as long as deemed necessary at the time; and all rehabilitated areas will be monitored and maintained until such time as required to enable the mine to apply for closure of these different areas.

#### **CLOSURE GOALS AND TARGETS**

"That all residual environmental impacts associated with the mining method employed, including possible final voids, infrastructure, and stockpile will be neutralized or minimised such that the post-mining environment is able to function in a manner which conforms to the concept of sustainable development." Implement operational control measures as indicated and required by the EMP:

- Ensure post mining provision (financial) is documented and available;
- Initiate first stage rehabilitation with the aim of establishing low yield graze land, simultaneous acknowledgement of structural and service-related factors for the later residential development objective
- Address post mining objectives as stipulated in the section below

# PERFORMANCE ASSESSMENTS

The proposed mining activities are only temporary on the land, so it is vital that rehabilitation of land takes place once mining operations have stopped. However, concurrent rehabilitation should take place where applicable. Mine reclamation activities are undertaken gradually; with the shaping and contouring of excavated areas,

- removal of infrastructure,
- replacement of topsoil,
- seeding with grasses and planting of trees taking place on the mined-out areas,

The above is largely achieved through bulldozers and scrapers which is used to reshape the disturbed area.

# **INFRASTRUCTURE AREA**

The removal, decommissioning and disposal of all mining infrastructure, will comply with all conditions contained in the MPRDA, 2002 (Act No. 28 of 2002). To this end, decommissioning and rehabilitation of all infrastructure areas will follow the following principles:

- will be requested to remove all fuel storage and reticulation facilities.
- Rip and grade the above areas for placement of topsoil.
- Rip and grade mine roads for placement of topsoil.
- Maintenance of roads required for maintenance and monitoring.
- Load from stockpile, haul, place and spread a layer of topsoil on all areas on which vegetation will be established.

- Establish vegetation on topsoiled surfaces, including analysis of topsoil, application of fertilisers, application of seed and hand planting as necessary.
- Active maintenance of planted areas for a period of at least a year, including re- seeding and replanting, weed and alien vegetation control as required.
- Passive maintenance of planted areas, including re-seeding and re-planting, weed and alien vegetation control as required.
- Undertake complete groundwater quality and water level monitoring to establish long-term groundwater levels and quality trends.
- Haul roads will have consolidated basement materials lifted and disposed into pit.
- Piping and water treatment infrastructure will be maintained on site until water quality monitoring data proves that the water quality is acceptable for direct release to the receiving environment.
- The detailed closure plan that will be developed at end of mine life will address water monitoring and maintenance requirements.
- plan that will be developed at end of mine life will address water monitoring and maintenance requirements.

#### MINE RESIDUE

Topsoil deposit will be capped where necessary and vegetated with the seed mix. The following basic principles of rehabilitation form the basis of the mining method:

- Prepare a rehabilitation plan prior to the commencement of mining.
- Agree on the long-term post mining land use objective for the area with the relevant government departments, local government councils and nearby community members.
- The land use must be compatible with the climate, soil, topography of the final landformand the degree of the management available after rehabilitation.
- Progressively rehabilitate the site, where possible, so that the rate of rehabilitation is similar to the rate of mining.
- Prevent the introduction of noxious weeds and pests.
- Minimise the area cleared for mining and associated facilities to that absolutely necessary for the safe operation of the mine.

# LEADING CLOSURE OBJECTIVES

# SOCIO ECONOMIC

# **Closure Management Objectives**

The retrenchment processes will be followed as per requirements of the applicable legalprocess.

#### Specific Performance Criteria

- The rehabilitated mining environment shall be made safe and deemed safe;
- Where possible infrastructure will remain for social investment opportunities, this willbe decided in conjunction
  with the Integrated Development Plan (IDP) of the area and the local authorities (i.e. municipality). The soils and
  land capability will be rehabilitated.
- All fences erected around the mine will be dismantled and either disposed of at a permitted disposal site or sold as scrap (provided these structures will no longer be required by the post-mining landowner).
- Fences erected to cordon-off dangerous excavations will remain in place and will be maintained as required.

#### TRAFFIC AND SAFETY

Closure Management Objective

 Ensure that all roads rehabilitated and or left behind is safe in good working condition, ensuring public safety and access to site and monitoring points.

#### Monitoring and reporting

- The site manager will inspect the roads for degradation and spillages.
- Speed limits will be enforced on site where appropriate and feasible.
- All incidences and issues will be recorded, as will the actions taken to address issues andrecords of such actions kept on site.

#### **Action required**

Any degradation to roads will be repaired with consultation of the roads department.

#### TOPOGRAPHY AND EROSION CONTROL

#### **Closure Management Objectives**

The area will have contours constructed to prevent soil erosion.

#### **Specific Performance Criteria**

- Surface water bodies shall not be left in any mining voids unless the operations managerdemonstrates there will be no significant environmental impact (such as salinization, reduction in water availability, toxicity, algal problems, attraction to pest species or a local safety hazard).
- All slopes which may incur erosion will be profiled in such a way that a preferentialdown drain can be installed.
- Rehabilitated profiles must ensure free drainage of water and should be contoured to fitin with the catchment dynamics.
- Erosion control measures such as contour banks and cut off berms should be constructed and soil vegetated in rehabilitated areas.
- On gentle slopes, water will be encouraged to flow off the rehabilitated surface as surface flow, as quickly as
  possible without causing erosion.
- Where areas of potential ponding are noted, is to be re-profiled to be free draining thereby minimising the potential for ponding.

# **Monitoring and Proposed Actions**

During decommissioning, the environmental site manager together with the site manager will monitor construction activities at least weekly to ensure the trenches and dams (sludge dam) are in accordance with the specification as per design.

- After rehabilitation the site will be monitored for any pooling or erosion on site, especially after rainfall. This will be
  the responsibility of the environmental site manager.
- The area needs to be surveyed every two months to monitor differential settlement.
- The environmental site manager will ensure annual soil assessments be conducted by specialist pedologists after rehabilitation of the site.
- Weekly inspections will be conducted by the environmental site manager for any erosion which must be addressed
  immediately if observed, and together with the site manager will inspect all pipelines and associated dirty water
  channels/compartments to ensure no leaks or damage to these.
- All dirty water separation and containment facilities will also be inspected at leastweekly (and after each rainfall
  event), to ensure adequate functioning of all systems to prevent leaks into the environment which will negatively
  impact on the soils.
- The environmental site manager will ensure monthly inspection of surrounding areas forsoil compaction.
- Ensure surface water monitoring and action plans are implemented.
- Rehabilitated sites will be inspected for soil erosion on a monthly basis, together with the visual inspection regards to the vegetation cover abundance.
- The rehabilitated areas must be monitored for the type and depth of soil cover used.

- Monitoring of any ecologically sensitive species should they be observed on site will bedone as and when required.
- The site will be monitored for alien invasive species at least every 6 months. This will,however, be dependent on the species of alien invasive species on site.
- Floral surveys will be conducted on rehabilitated areas on an annual basis, together with the soil quality and depth monitoring.
- All reports will be kept at the mining offices. All incidences and issues will be recorded, as will the actions taken to
  address issues. The environmental site manager will be responsible for inspection of sites and keeping records of
  all monitoring activities.
- The site manager is responsible for ensuring that all vehicles, remaining on site during the decommission phase, are serviced on a regular basis in terms of the maintenance plans.

#### **Action Required**

- Any pooling will be addressed by filling depression and / or grading areas and re-vegetating such sites.
- Any erosion will also be addressed utilising contour berms, gabion structures if necessary or a specialist will be consulted if necessary. Any eroded soils will be liftedand returned to the affected area.
- Any deficiencies will be corrected by placing material in these areas as per the rehabilitation plan.
- Additional material or soil will be brought in if required.
- Where topographical areas are exceeded and create storm water drainage issues, excess material will be removed and area rehabilitated as per the rehabilitation plan.
- Any recommendations made by specialist pedologist after annual surveys of rehabilitated areas will be considered for implementation as proposed.
- Any eroded soil will be lifted and replaced to the area which has been eroded.
- The area will be rehabilitated as per the rehabilitation plan.
- Erosion control measures, such as gabion structures, will be considered at areas whereerosion is persistent.
- Records of soil placement and package thickness will be kept on a monthly basis during the mining phase.
- Where the soil depth is compromised the areas will be filled with topsoil.
- Material will be brought in if necessary.
- Silt build-up in water management facilities will be cleared and deposited in residuedeposits if dirty.
- Any compacted soils will be ripped and re-vegetated with indigenous flora. Vegetationwill then be monitored in these areas.
- Should any erosion be observed on site, it will be reported to the site manager and environmental site manager. The issue will be addressed and consideration given to:
- Increasing vegetative cover in problem areas through manual seeding/planting.
- Implementing erosion control measures such as contour berms or gabion baskets.

#### **CONSULTING SPECIALISTS**

- Should soil depth be inadequate in the rehabilitated areas, then more soil will be brought in and deposited on the site.
- The area will also be inspected for erosion to determine the reason for soil loss. This will be addressed immediately.
- All recommendations made by the specialists will be implemented wheredeemed appropriate.
- Manual seeding or planting should vegetative cover be inadequate.
- An alien invasive management program will be implemented for the control and eradication of alien invasive species on site. This plan will give preference to mechanical control methods.

#### SURFACE WATER CONTROL

#### **Closure Management Objectives**

- Surface water will be managed as per GN704 and all clean water will be diverted around the rehabilitated area.
- All water that falls on the rehabilitated area will be managed in such a way that noerosion will occur through the use of contour drains.
- Potential dirty water will be directed to containment dams or silt dams.
- The filled and rehabilitated area will be shaped to facilitate run-off towards thecatchment area.
- There shall be no long term reduction in the availability of water to meet localenvironmental values.

#### **Specific Performance Criteria**

- Actions shall be taken during rehabilitation to ensure that surface and groundwater hydrological patterns/flows will
  not be adversely affected by the rehabilitation.
- Surface and groundwater levels and quality will reflect original levels and water chemistry;
- Clean water diversion drains are to be installed around the area. Once the final re- profiling has been completed and the clean water diversions are constructed on the rehabilitated ground.
- Run-off from un-rehabilitated areas will be directed away from any rehabilitated areas. Runoff from rehabilitated areas will be channelled to sedimentation structures so that eroded soil does not leave the property.
- Where seepage/decant may occur deep cut off trenches will be created to intercept the ground water where it
  daylights downstream and directed or pumped to the containment dam upslope of the void.
- Natural drainage lines will be followed to reduce loss of water in the natural catchments.

#### **Monitoring and Proposed Actions**

The environmental site manager will ensure that surface water quality is monitored during the closure phase:

- A water quality report will be compiled on a quarterly basis and will show all the high-risk areas and areas deviating from current background water quality.
- Specialists' recommendations with regard to water quality issues observed, will be implemented as appropriate.
- Water management features will be upgraded as necessary if water quality issues arise from these structures.
- The rehabilitated area will be monitored for ponding.
- Any areas where ponding occurs will be filled and reshaped as per the rehabilitation plan to ensure surface water runoff from the area and discourage ponding.

# Water Quality Monitoring and Reporting

- This monitoring program will include various upstream and downstream monitoring points and various sources on site.
- Database of results will be maintained by the environmental site manager and quarterly and annual reports will be compiled and submitted to the mine management and will besubmitted to DWS.
- All samples will be submitted to an accredited laboratory for analysis.

# **ECOLOGY**

#### **Closure Management Objectives**

Areas will be fenced off once seeded to prevent surface disturbance to the site and allow for vegetation to
establish and stabilise.

#### Specific Performance criteria

- Vegetation in rehabilitated areas will have equivalent values as surrounding naturalecosystems.
- The rehabilitated ecosystem will have equivalent functions and resilience as the targetecosystem.
- Soil properties will be appropriate to support the target ecosystem.

- The rehabilitated areas will provide appropriate habitat for fauna
- Fauna utilisation, abundance and diversity appropriate to specified post mining landuse.
- Berms will be maintained. This will be undertaken by vegetating all berms to ensure thatthey are stable. The berms
  will also be inspected to ensure that there are no cracks, which could cause leakage. The berms will only be
  demolished should the area prove to be free draining with no pollution potential after rehabilitation.

#### **Monitoring and Proposed Actions**

- Services of a qualified person will be used to monitor the re-vegetation of the rehabilitated areas.
- Records of the monitoring will be kept on site.
- The environmental site manager will ensure that an alien invasive monitoring, eradication and control programme
  is established during closure and the area will be inspected at least every 3 months and more frequently in
  areas where alien specieswere observed.
- The environmental site manager will be responsible for inspecting and managing any protected flora that may be identified by specialists. Specialists will be consulted regarding relocation of these species if necessary during rehabilitation or closure.
- All incidences and issues during closure will be recorded, as will the actions taken to address issues. These will be filed and kept at the mine offices.
- Rehabilitation will be visually inspected at least monthly with regards to vegetation cover abundance.
- The rehabilitated area will be inspected monthly for general erosion and vegetative cover.
- Rehabilitated areas will be monitored for soil quality and depth annually.

# **Action Required**

- Should it be noted that designs are not being followed, rehabilitation activities will be amended to ensure corrective
  measures will be taken to ensure design specifications are achieved. Specialists will be consulted if necessary.
- The specialist's recommendations from bio-monitoring and from annual floral surveys of rehabilitated areas will be implemented as soon as possible.
- Should any erosion be observed on site, it will be reported to the site manager and environmental site manager. The issue will be addressed and consideration given to:
  - ✓ Increasing vegetative cover in problem areas through manual seeding/planting.
  - ✓ Implementing erosion control measures such as contour berms or gabionbaskets.
  - Consulting specialists.
  - Should soil depth be inadequate in the rehabilitated areas, more soil will bebrought in and deposited on the site.
  - ✓ The area will also be inspected for erosion to determine the reason for soil loss.
  - ✓ All recommendations made by the specialists will be followed.
  - ✓ Manual seeding or planting should vegetative cover be inadequate.
  - ✓ An alien invasive management programme will be implemented for the control and eradication of alien invasive species on site. This plan will give preference to mechanical control methods. Any chemicals utilised must be used responsibly.

# **LAND USE**

# **Closure Management objectives**

To ensure that rehabilitation (physical and chemical) is done to such an extent that land use potential is regained.

# **Specific Performance Criteria**

 Soil samples will be taken from rehabilitated areas annually over the full period of closure to determine soil fertility, depth compaction, acidity and mine related pollution. This should be conducted by qualified specialist who will also recommend actions and remedial measures to correct any issues observed on site.

- Only after the levelled areas have been inspected and approved by the Mine Manager/Site Manager will topsoil
  be placed. The topsoil layer must be as even as possible, i.e. it must be smooth and the depth must remain
  consistent throughout.
- Once the topsoil has been replaced, vehicle movement will be restricted to prevent compaction of the topsoil. All
  runoff from freshly top soiled areas will be channelled to pollution control structures so that eroded soil does no
  leave the property.
- Rehabilitated areas will be vegetated within the same growing season (before or during the rainy season). A
  suitable seed bed will be prepared to enhance the penetration and absorption of water, thereby giving the seed
  the best possible chance to germinate. The seeding depth should be very shallow to provide better germination.
  For most grass species seeding depth is approximately 5- 15mm.
- Rehabilitated areas will be re-vegetated with local indigenous flora as far as possible.
- Once the seed mixture has been sown the land must be rolled using to ensure consolidation around the seeds and effective moisture retention. Access to seededareas will be restricted to protect the newly established pasture.

# **Monitoring and Measurement**

- A detailed monitoring and reporting programme will be established and followed.
- Rehabilitated areas will be monitored for vegetation cover and alien invasiveencroachment at least monthly by visual means.
- Areas of failed growth will be fertilised if necessary and re-seeded or planted withseedling plugs. All
  exotic and invasive vegetation should be removed.

#### **GROUND WATER**

#### **Closure Management Objective**

- A cut-off intercept drain will be constructed to capture any seepage.
- Monitoring will continue to detect and report on changes in round water regime

# Groundwater Quality and Quantity Monitoring and Reporting

- Up slope and down slope groundwater monitoring will be conducted on a quarterlybasis during the closure phase;
- Water management features will be upgraded as necessary if water quality issues arisefrom these structures.
- The environmental site manager will be responsible for the implementation andmaintenance of the groundwater monitoring and results obtained.
- The groundwater quality and levels will be monitored on a quarterly basis.
- All monitoring boreholes must be demarcated and protected to prevent damage ortampering.
- All samples will be submitted to an accredited laboratory for analysis.

# **General Monitoring and Reporting**

- The environmental site manager and site manager will inspect all water management facilities and associated pipelines at least weekly to ensure there are no leaks which would result in loss of water and that they are functioning optimally.
- The environmental site manager will be responsible for inspection of sites and keeping records of all monitoring activities
- All incidences and issues will be recorded, as will the actions taken to address issues. These will be kept at the mine offices.

# **Action Required**

Should significant changes in qualities or levels be observed then:

- All high risk facilities will be inspected to ensure no severe problems occur in these areas which have resulted in poor quality leachate.
- Any issues observed will be reported to the environmental site manager and respective site manager.
- A geo-hydrologist will be consulted with regards to any additional mitigation or management activities which can assist in resolving potential pollution, such as cut-off drains.
- Should substantial decreases in groundwater levels or quality be observed in boreholes utilised by surrounding community then the applicant will need to find solutions in conjunction with affected parties.
- Should spikes be observed in water consumption then these will be investigated immediately and sources identified.
- All leaks identified will be repaired.
- Silt build-up in water management facilities / dams will be cleared and deposited in soil stockpiles if clean or in residue deposits if dirty.

# **AIR QUALITY AND NOISE**

#### **Closure Management Objectives**

Dust suppression should be undertaken at site especially during the dry season and during windy conditions.

# Monitoring and proposed actions

- Dust suppression techniques and/or frequency will be altered as necessary should dust levels become excessive and exceed target values during rehabilitation.
- Air quality monitoring and reporting will be conducted according to the GNR 827 Dust control regulations;
- The environmental site manager will be responsible for managing the air quality database and implementing
  actions, should target levels and frequencies be exceeded. PM10 and PM2.5 monitoring will be conducted if
  required as per the air quality act and also fall within the responsibility of the environmental site manager.
- Ambient noise will be monitored bi-annually on the mine boundary in at least four compass directions.
- Occupational noise will be monitored on a monthly basis as part of Safety, Health and Environment.
- The environmental site manager will be responsible for managing noise level database and implement actions should acceptable noise levels be exceeded.
- The site manager will be responsible for ensuring that all vehicles, including those of contractors, are maintained as per their maintenance plan.
- All incidences and issues will be recorded, as will the actions taken to address issues. These will be kept at the
  mine offices.
- Specialists will be consulted where necessary.

#### **Action required**

- Should ambient dust levels exceed recommended standards and frequencies as per the Air Quality Act, then the management plan for dust will be re-evaluated and assessed to improve dust control on site. Actions could include:
- Use of dust binding agents in areas of high dust generation.
- Consideration of sprinkler systems in areas of high dust generation.
- More frequent spraying.
- Should ambient noise levels exceed target levels:
- Additional noise measurements will be taken at all sensitive receptors beyond the mine boundary in question, initially those nearest to the mine and working further away until levels are within acceptable levels.
- Should levels at sensitive receptors still exceed target levels, and it is due to mining activities, then the noise management plan will be re-evaluated to reduce noise at thesesensitive receptors to within acceptable limits.

Provide a rehabilitation plan that describes and shows the scale and aerial extent of the main mining activities, including the anticipated mining area at the time of closure.

The Rehabilitation & Closure Plan is attached as Appendix 9.

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

XXXXX

(a) Confirm that the financial provision will be provided as determined.

#### **Financial Guarantee**

The financial guarantee for the rehabilitation for land disturbed **Impulse Mining (Pty)** Ltd submitted together with the application for the mining permit.

# **Rehabilitation Fund**

Impulse Mining (Pty) Ltd will also make provision for rehabilitation during closure by establishing a rehabilitation trust.



# E) IMPACTS TO BE MITIGATED IN THEIR RESPECTIVE PHASES

Measures to rehabilitate the environment affected by the undertaking of any listed activity paragraph ();

ACTIVITIES	PHASE	SIZE AND SCALE	MITIGATION MEASURES	COMPLIANCE WITH	TIME PERIOD FOR IMPLEMENTATION
		of disturbance		STANDARDS	
(E.g. For prospecting - drill site, site	(of operation in	(volumes, tonnages			Describe the time period when the
camp, ablution facility, accommodation,	which activity will	and hectares or m²)	(describe how each of the recommendations in		measures in the environmental
equipment storage, sample storage, site	take place.		herein will remedy the cause of pollution or	(A description of how	management programme must be
office, access route etcetc			degradation and migration of pollutants)	each of the	implemented Measures must be
	State;			recommendations	implemented when required.
E.g. For mining,- excavations, blasting,	Planning and			herein will comply with	With regard to Rehabilitation specifically this
stockpiles, discard dumps or dams,	design,			any prescribed	must take place at the earliest opportunity.
Loading, hauling and transport, Water	Pre-Construction'			environmental	.With regard to Rehabilitation, therefore
supply dams and boreholes,	Construction,			management standards	state either:
accommodation, offices, ablution, stores,	Operational,			or practices that have	Upon cessation of the individual activity
workshops, processing plant, storm water	Rehabilitation,			been identified by	Or.
control, berms, roads, pipelines, power	Closure, Post			Competent Authorities)	Upon the cessation of mining, bulk sampling
lines, conveyors, etcetc)	closure).				or prospecting as the case may be.
Clearance of vegetation	Pumping sand from	5ha	1. Site clearing must take place in a phased	Compliance with Duty of	Duration of operations on the mining
	the river and		manner, as and when required.	Care as detailed within	activities.
	creating a settling		2. Areas which are not to be mined within two	NEMA	
	pond- (construction		months must not be cleared to reduce erosion		
	and operation		risks.		
	phase)		3. The area to be cleared must be clearly		
			demarcated and this footprint strictly		
			maintained.		
			4. Spoil that is removed from the site must be		
			removed to an approved spoil site or a licensed		
			landfill site.		

		1	5.	The necessary silt fences and erosion control		
			J.	measures must be implemented in areas where		
				•		
Operation of mode	Dominion and from		4	these risks are more prevalent.	O-marking and with Date of	Duration of countings on the minimum
Construction of roads	Pumping sand from		1.	Planning of access routes to the site for	Compliance with Duty of	Duration of operations on the mining
	the river -			construction/mining purposes shall be done in	Care as detailed within	activities.
	(construction and			conjunction with the Contractor and the	NEMA	
	operation phase)			Landowner. All agreements reached should be		
				documented and no verbal agreements should		
				be made. The Contractor shall clearly mark all		
				access roads. Roads not to be used shall be		
				marked with a "NO ENTRY for mining vehicles"		
				sign.		
			2.	Construction routes and required access roads		
				must be clearly defined.		
			3.	Damping down of the un-surfaced roads must		
				be implemented to reduce dust and nuisance.		
			4.	Soils compacted by construction/mining		
				activities shall be deep ripped to loosen		
				compacted layers and re-graded to even		
				running levels.		
			5.	The contractor must ensure that damage		
				caused by related traffic from a gravel road is		
				repaired continuously. The costs associated		
				with the repair must be borne by the contractor.		
			6.	Dust suppression measures must be		
				implemented for heavy vehicles such as wetting		
				of gravel roads on a regular basis and ensuring		
				that vehicles used to transport the gravel are		
				fitted with tarpaulins or covers.		
			7.	All vehicles must be road-worthy, and drivers		
				must be qualified and made aware of the		
				potential road safety issues and need for strict		
				speed limits.		
				albana 1991		

Mining Sand (QY) – Soils and geology	Pumping sand from	5ha	1.	The Contractor should, prior to the	Compliance with Duty of	Duration of operations on the mine
	the river -			commencement of earthworks determine the	Care as detailed within	'
	(construction and			average depth of topsoil (If topsoil exists), and	NEMA	
	operation phase)			agree on this with the ECO. The full depth of		
	operation prices)			topsoil should be stripped from areas affected		
				by construction and related activities prior to the		
				commencement of major earthworks. This		
				should include the building footprints, working		
				areas and storage areas. Topsoil must be		
				reused where possible to rehabilitate disturbed		
				areas.		
			2.	Care must be taken not to mix topsoil and		
				subsoil or any other material, during stripping.		
			3.	The topsoil must be conserved on site in and		
				around mining permit area.		
			4.	Subsoil and overburden in the mining area		
			. (	should be stockpiled separately to be returned		
				for backfilling in the correct soil horizon order.		
			5.	If stockpiles are exposed to windy conditions or		
				heavy rain, they should be covered either by		
				vegetation or geofabric, depending on the		
				duration of the project. Stockpiles may further		
				be protected by the construction of berms,		
				trenches or low brick walls around their bases.		
			6.	Stockpiles should be kept clear of weeds and		
				alien vegetation growth by regular weeding.		
			7.	Where contamination of soil is expected,		
				analysis must be done prior to disposal of soil to		
				determine the appropriate disposal route. Proof		
				from an approved waste disposal site where		
				contaminated soils are dumped if and when a		
				spillage/leakage occurs should be attained and		
				given to the project manager.		

			8.	The impact on the geology will be permanent.		
Mining Sand (QY) – Soils and geology	Pumping sand from the river - (construction and operation phase)	5ha	4.	The impact on the geology will be permanent. There is no mitigation measure.  The mining activities must aim to adhere to the relevant noise regulations and limit noise to within standard working hours to reduce disturbance of dwellings in close proximity to the development.  Mine, workshops, and other noisy fixed facilities should be located well away from noise sensitive areas. Once the proposed final layouts are made available by the Contractor(s), the sites must be evaluated in detail and specific measures designed into the system.  Truck traffic should be routed away from noise sensitive areas, where possible.  Noise levels must be kept within acceptable limits.  Noisy operations should be combined so that	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the mining area
			6. 7. 8. 9.	they occur where possible at the same time.  Mine workers to wear necessary ear protection gear.  Noisy activities to take place during allocated hours.  Noise from labourers must be controlled.  Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site.  The Contractor must take measures to discourage labourers from loitering in the area		

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

and causing noise disturbance. Where possible
labour shall be transported to and from the site
by the Contractor or his Sub-Contractors by the
Contractors own transport.
11. Implementation of enclosure and cladding of
processing plants.
12. Applying regular and thorough maintenance
schedules to equipment and processes. An
increase in noise emission levels very often is a
sign of the imminent mechanical failure of a
machine.

# F) IMPACT MANAGEMENT ACTIONS

(A description of impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated in paragraphs (c) and (d) will be achieved).

ACTIVITY	POTENTIAL	ASPECTS	PHASE	MITIGATION	STANDARD TO BE
(whether listed or not listed).	IMPACT	AFFECTED	In which impact is anticipated	ТҮРЕ	ACHIEVED
(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etcetc).	(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etcetc)		(e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)	(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc)  E.g.  • Modify through alternative method.  • Control through noise control  • Control through management and monitoring  • Remedy through rehabilitation	(Impact avoided, noise levels, dust levels, rehabilitation standards, end use objectives) etc.
Clearance of vegetation	Loss or fragmentation of habitats	Fauna & flora	(construction and operation phase)	<ol> <li>Existing vegetation</li> <li>Vegetation removal must be limited to the mining area.</li> <li>Vegetation to be removed as it becomes necessary rather than removal of all vegetation throughout the site in one step.</li> <li>No vegetation to be used for firewood.</li> <li>Exotic and invasive plant species should not be allowed to establish, if the development is approved.</li> <li>There should be a preconstruction walk-through of the development footprint/project site in order to locate individuals of plant species of conservation concern. A search and rescue exercise must be done to locate and relocate any protected species to a suitable and similar</li> </ol>	Minimisation of impacts to acceptable limits

13. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.  Demarcation of mining area  14. All plants not interfering with mining operations shall be left undisturbed clearly marked and indicated on the site plan.  15. The mining area must be well demarcated, and no construction/mining activities must be allowed outside of this demarcated footprint.
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16. Vegetation removal must be phased in order to reduce impact of construction/mining.  17. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.  18. Strict and regular auditing of the mining process to ensure containment of the mining and laydown areas.  19. Soils must be kept free of petrochemical solutions that may be kept on site during construction/mining. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora.  19. Utilisation of resources  20. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.  Exotic vegetation  21. Alien vegetation on the site will need to be controlled.  22. The Contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.  23. The spread of exotic species occurring throughout the site should be controlled.  24. Weed control measures must be applied to eradicate any noxious weeds (category 1a &1b species) on disturbed areas.  Herbicides  25. Herbicides  26. Herbicides  27. Herbicides  28. The contractor should be allowed according to seatered executive areas fiscilines. The executation exhalls he

Mining Sand (QY)	Loss of topsoil	Soil	(construction and	28. 29. 30.	surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.  The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.  Fauna  Rehabilitation to be undertaken as soon as possible after the mining activities have been completed.  No trapping or snaring to fauna on the construction/mining site should be allowed.  No faunal species must be disturbed, trapped, hunted, or killed by maintenance staff during any routine maintenance at the development.  Any fauna threatened by the construction and operation activities should be removed to safety by the ECO or appropriately qualified environmental officer.  All construction vehicles should adhere to a low-speed limit (<30km/h) to avoid collisions with susceptible species such as snakes and tortoises.  If trenches need to be dug for electrical cabling or other purposes, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are exposed should contain soil ramps allowing fauna to escape the trench.  The Contractor should, prior to the commencement of	Minimisation of impacts to
wiining Sand (QY)	Loss of topsoil	SOII	operation phase)	1.	earthworks determine the average depth of topsoil, and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil	acceptable limits

	must be reused where possible to rehabilitate disturbed areas.  2. Care must be taken not to mix topsoil and subsoil or any other material, during stripping.  3. The topsoil must be conserved on site in and around mining permit area.  4. Subsoil and overburden in the mining area should be stockpiled separately to be returned for backfilling in the correct soil horizon order.  5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases.  6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding.  7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager.  Establish an effective record keeping system for each area where soil is disturbed for mining purposes. These records should be included in environmental performance reports, and should include all the records below.  • Record the GPS coordinates of each area.  • Record the GPS coordinates of where the topsoil is stockpiled.
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			•	Record the date of cessation mining activities at the particular site.  Photograph the area on cessation of mining activities.  Record date and depth of re-spreading of topsoil.  Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time.	
Erc	rosion Soil Air Water	(construction and operation phase)	<ol> <li>2.</li> <li>4.</li> <li>7.</li> </ol>	An effective system of run-off control should be implemented, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. Periodical site inspection should be included in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence of any erosion on site or downstream.  Implement an effective system of run-off control, where it is required, that collects and safely disseminates runoff water from all hardened surfaces and prevents potential down slope erosion.  Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly Wind screening and stormwater control should be undertaken to prevent soil loss from the site.  The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion.  Other erosion control measures that can be implemented are as follows:  Brush packing with cleared vegetation  Mulch or chip packing	Minimisation of impacts to acceptable limits

			10. 11. 12. 13.	<ul> <li>Planting of vegetation</li> <li>Hydroseeding/hand sowing</li> <li>Sensitive areas need to be identified prior to construction/ mining so that the necessary precautions can be implemented.</li> <li>All erosion control mechanisms need to be regularly maintained.</li> <li>Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces.</li> <li>Retention of vegetation where possible to avoid soil erosion.</li> <li>Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time.</li> <li>Re-vegetation of disturbed surfaces should occur immediately after construction/mining activities are completed. This should be done through seeding with indigenous grasses.</li> <li>No impediment to the natural water flow other than approved erosion control works is permitted.</li> <li>To prevent stormwater damage, the increase in stormwater run-off resulting from construction/mining activities must be estimated and the drainage system assessed accordingly.</li> <li>Stockpiles not used in three (3) months after stripping</li> </ul>	
			16.	• .	
Air Pollution	Air	(construction and operation phase)	1.	Dust control Wheel washing and damping down of un-surfaced and un-vegetated areas. Retention of vegetation where possible will reduce dust travel.	Minimisation of impacts to acceptable limits

3. Clearing activities must only be done during agreed working times and permitting weather conditions to avoid drifting of sand and dust into neighbouring areas. 4. Dawer or sprinklers when necessary to reduce dust. 5. The Contractor shall be responsible for dust control on site to ensure no unisance is caused to the neighbouring communities. 6. A speed limit of 30km/h must not be exceeded on site. 7. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the Contractor shall be attended to immediately by the Contractor. 8. Any dust reads that are utilised by the workers must be regularly maintained to ensure that dust levels are controlled.  Odour control 9. Regular servicing of vehicles in order to limit gaseous emissions. 10. Regular servicing of onsite toilets to avoid potential odours.  Rehabilitation 11. The Contractor should commence rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks.  Fire prevention 12. No open fires shall be allowed on site under any circumstance, All cooking shall be done in demacrated areas that are safe and cannot cause runaway fires. 13. The Contractor shall have operational fire-fighting equipment available on site at all times. The level of	2 Classing activities are a culture dama devices arread
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13. The Contractor shall have operational fire-fighting	
	· · · · · · · · · · · · · · · · · · ·
equipment available on site at all times. The level of	
	equipment available on site at all times. The level of

		1	firefighting equipment must be assessed and evaluated	
			through a typical risk assessment process.	
Noise	(construction and	1		Minimisation of impacts to
Noise	(construction and	1.	The mining activities must aim to adhere to the relevant	•
	operation phase)		noise regulations and limit noise to within standard	acceptable limits
			working hours in order to reduce disturbance of	
			dwellings in close proximity to the development.	
		2.	Mine, crushers, workshops and other noisy fixed	
			facilities should be located well away from noise	
			sensitive areas. Once the proposed final layouts are	
			made available by the Contractor(s), the sites must be	
			evaluated in detail and specific measures designed in	
		1	to the system.	
		3.	Truck traffic should be routed away from noise sensitive	
			areas, where possible.	
		4.	Noise levels must be kept within acceptable limits.	
		5.	Noisy operations should be combined so that they occur	
			where possible at the same time.	
		6.	Mine workers to wear necessary ear protection gear.	
		7.	Noisy activities to take place during allocated hours.	
		8.	Noise from labourers must be controlled.	
		9.	Noise suppression measures must be applied to all	
			equipment. Equipment must be kept in good working	
			order and where appropriate fitted with silencers which	
			are kept in good working order. Should the vehicles or	
			equipment not be in good working order, the Contractor	
			may be instructed to remove the offending vehicle or	
			machinery from the site.	
		10.	The Contractor must take measures to discourage	
			labourers from loitering in the area and causing noise	
			disturbance. Where possible labour shall be transported	
			to and from the site by the Contractor or his Sub-	
			Contractors by the Contractors own transport.	
		11.	Implementation of enclosure and cladding of processing	
			plants.	
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			12.	Applying regular and thorough maintenance schedules	
				to equipment and processes. An increase in noise	
				emission levels very often is a sign of the imminent	
				mechanical failure of a machine.	
Impact on potential	Heritage and	(construction and	1.	Any finds must be reported to the nearest National	Minimisation of impacts to
cultural, heritage	Palaeontology	operation phase)		Monuments office to comply with the National Heritage	acceptable limits
artefacts and				Resources Act (Act No 25 of 1999) and to DEA.	
fossils.			2.	Local museums as well as the South African Heritage	
				Resource Agency (SAHRA) should be informed if any	
				artefacts/ fossils are uncovered in the affected area.	
			3.	The Contractor must ensure that his workforce is aware	
				of the necessity of reporting any possible historical,	
				archaeological or palaeontological finds to the ECO so	
				that appropriate action can be taken.	
			4	Known sites should be clearly marked in order that they	
				can be avoided. The work force should also be informed	
				that fenced-off areas are no-go areas.	
			5.	The ECO must also survey for heritage and	
			•	palaeontological artefacts during ground breaking and	
				digging or drilling. He/she should familiarise themselves	
				with formations and its fossils or a palaeontologist	
				should be appointed during the digging and excavation	
				phase of the development.	
			6	All digging, excavating, drilling or blasting activities must	
			0.	be stopped if heritage and/or palaeontological artefacts	
				are uncovered and a specialist should be called in to	
				determine proper management, mitigation, excavation	
				and/or collecting measures.	
			7	Any discovered artefacts or fossils shall not be removed	
			/.	·	
				under any circumstances. Any destruction of a site can only be allowed once a permit is obtained and the site	
				·	
				has been mapped and noted. Permits shall be obtained	
				from SAHRA should the proposed site affect any world	
				heritage/palaeontology sites or if any	

	heritage/palaeontology sites are to be destroyed or
	altered.
	8. Under no circumstances shall any artefacts be
	removed, destroyed or interfered with by anyone on the
	site; and contractors and workers shall be advised of the
	penalties associated with the unlawful removal of
	cultural, historical, archaeological or palaeontological
	artefacts, as set out in the NHRA (Act No. 25 of 1999),
	Section 51. (1).
	9. If anything of Archaeological and/or paleontological
	significance is found during the construction and
	operational phase of the mine the following applies:
	NHRA 38(4)c(i) – If any evidence of archaeological sites
	or remains (e.g. remnants of stone-made structures,
	indigenous ceramics, bones, stone artefacts, ostrich
	eggshell fragments, charcoal and ash concentrations),
	fossils or other categories of heritage resources are
	found during the proposed development, SAHRA APM
	Unit (021 462 5402) must be alerted as per section
	35(3) of the NHRA. Non-compliance with section of the
	NHRA is an offense in terms of section 51(1)e of the
	NHRA and item 5 of the Schedule;
	NHRA 38(4)c(ii) – If unmarked human burials are
	uncovered, the SAHRA Burial Grounds and Graves
	(BGG) Unit (012 320 8490), must be alerted
	immediately as per section 36(6) of the NHRA. Non-
	compliance with section of the NHRA is an offense in
	terms of section 51(1)e of the NHRA and item 5 of the
	Schedule;
	NHRA 38(4)e – The following conditions apply with
	regards to the appointment of specialists: i) If heritage
	resources are uncovered during the course of the
	development, a professional archaeologist or
<u> </u>	

palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA: If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist. **Chance Find Procedure** If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find. The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include

Waste management	Pollution	(construction and	<ul> <li>photographs of the find, from various angles, as well as the GPS co-ordinates.</li> <li>A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.</li> <li>Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.</li> <li>Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.</li> <li>The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sandbags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.</li> <li>In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.</li> <li>Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.</li> <li>Litter management</li> </ul>	Minimisation of impacts to
		operation phase)	Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction site.	acceptable limits

2. The Contractor shall supply waste collection bins where
such is not available and all solid waste collected shall
be disposed of at registered/licensed landfill.
3. Good housekeeping practices should be implemented
to regularly maintain the litter and rubble situation on the
construction site.
4. If possible and feasible, all waste generated on site
must be separated into glass, plastic, paper, metal and
wood and recycled. An independent contractor can be
appointed to conduct this recycling.
5. Littering by the employees of the Contractor shall not be
allowed under any circumstances. The ECO shall
monitor the neatness of the work sites as well as the
Contractor campsite.
6. Skip waste containers should be maintained on site.
These should be kept covered and arrangements made
fo <mark>r them to</mark> be collected regularly.
7. All waste must be removed from the site and
transported to a landfill site promptly to ensure that it
does not attract vermin or produce odours.
8. Where a registered waste site is not available close to
the construction site, the Contractor shall provide a
method statement with regard to waste management.
9. A certificate of disposal shall be obtained by the
Contractor and kept on file, if relevant.
10. Under no circumstances may solid waste be burnt on
site.
11. All waste must be removed promptly to ensure that it
does not attract vermin or produce odours.
· ·
Hazardous waste
12. All waste hazardous materials must be carefully stored
as advised by the ECO, and then disposed of offsite at

	a licensed lendfill site, where practical Insinaration may
	a licensed landfill site, where practical. Incineration may
	be used where relevant.
	13. Contaminants to be stored safely to avoid spillage.
	14. Machinery must be properly maintained to keep oil
	leaks in check.
	15. All necessary precaution measures shall be taken to
	prevent soil or surface water pollution from hazardous
	materials used during construction and any spills shall
	immediately be cleaned up and all affected areas
	rehabilitated.
	Sanitation
	16. The Contractor shall install mobile chemical toilets on
	the site.
	17. Staff shall be sensitised to the fact that they should use
	these facilities at all times. No indiscriminate sanitary
	activities on site shall be allowed.
	18. Toilets shall be serviced regularly and the ECO shall
	inspect toilets regularly.
	19. Toilets should be no closer than 50m or above the 1:100
	year flood line from any natural or manmade water
	bodies or drainage lines or alternatively located in a
	place approved of by the Engineer.
	20. Under no circumstances may open areas, neighbours
	fences or the surrounding bush be used as a toilet
	facility.
	21. The construction of "Long Drop" toilets is forbidden, but
	rather toilets connected to the sewage treatment plant.
	22. Potable water must be provided for all construction staff.
	Remedial actions
	23. Depending on the nature and extent of the spill,
	contaminated soil must be either excavated or treated
	on-site.
<u> </u>	

				25. 26. 27. 28.	Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site.  The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material.  If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure.  Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use.  Contaminated remediation materials must be carefully	
					removed from the area of the spill so as to prevent further release of petrochemicals to the environment, and stored in adequate containers until appropriate disposal.	
Water Use and Quality	Water pollution	Water	(construction and operation phase)		Water Use Develop a sustainable water supply management plan to minimise the impact to natural systems by managing water use, avoiding depletion of aquifers and minimising impacts to water users.  Water must be reused, recycled or treated where possible.  Water Quality The quality and quantity of effluent streams discharged to the environment including stormwater should be managed and treated to meet applicable effluent discharge guidelines.	

4. Discharge to surface water should not result in
contaminant concentrations in excess of local ambient
water quality criteria outside a scientifically established
mixing zone.
5. Efficient oil and grease traps or sumps should be
installed and maintained at refueling facilities,
workshops, fuel storage depots, and containment areas
and spill kits should be available with emergency
response plans.
Stormwater
6. The site must be managed in order to prevent pollution
of drains, downstream watercourses or groundwater,
due to suspended solids and silt or chemical pollutants.
7. Silt fences should be used to prevent any soil entering
the stormwater drains.
8. Temporary cut off drains and berms may be required to
ca <mark>pture storm</mark> water and promote infiltration.
9. Promote a water saving mind set with
construction/mining workers in order to Contractor
ensure less water wastage.
10. Hazardous substances must be stored at least 40m
from any water bodies on site to avoid pollution.
11. The installation of the stormwater system must take
place as soon as possible to attenuate stormwater from
the construction phase as well as the operation phase.
12. Earth, stone and rubble is to be properly disposed of, or
utilized on site so as not to obstruct natural water path
ways over the site. i.e. these materials must not be
placed in stormwater channels, drainage lines or rivers.
13. There should be a periodic checking of the site's
drainage system to ensure that the water flow is
unobstructed.

14. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.  Groundwater resource protection  15. Process solution storage ponds and other impoundments designed to hold non fresh water or nontreated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.
Sanitation  16. Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).  17. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.  Concrete mixing  18. Concrete contaminated water must not enter soil or any natural drainage system as this disturbs the natural acidity of the soil and affects plant growth.
Public areas  19. Food preparation areas should be provided with adequate washing facilities and food refuse should be stored in sealed refuse bins which should be removed from site on a regular basis.  20. The Contractor should take steps to ensure that littering by construction/mining workers does not occur and persons should be employed on site to collect litter from

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

	the site and immediate surroundings, including litter
	accumulating at fence lines.
	21. No washing or servicing of vehicles on site.

# **G) IMPACT MANAGEMENT ACTIONS**

(A description of impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated in paragraphs (c) and (d) will be achieved).

ACTIVITY	POTENTIAL IMPACT	MITIGATION	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
Whether listed or not listed.	TOTERTIAL IIIII AOT	TYPE	TIME I ENIOD I ON IMILEE MENTATION	COM EIANGE WITH GTANDARDS
Whether listed of flot listed.		1112	Describe the time period when the	
(E.g. Excavations,	(e.g. dust, noise,		measures in the environmental	(A description of how each of the
blasting, stockpiles,	drainage surface	(modify, remedy, control, or stop)	management programme must be	recommendations in 2.11.6 read with
discard dumps or dams,	disturbance, fly rock,	through	implemented Measures must be	2.12 and 2.15.2 herein will comply with
Loading, hauling and	surface water	(e.g. noise control measures, storm-water control, dust control,	implemented when required.	
transport, Water supply	contamination,	rehabilitation, design measures, blasting controls, avoidance,	With regard to Rehabilitation specifically	any prescribed environmental management standards or practices
	groundwater	relocation, alternative activity etc. etc)	this must take place at the earliest	,
dams and boreholes, accommodation, offices,	contamination, air	relocation, alternative activity etc. etc)	·	*
	•	Fa	opportunityWith regard to Rehabilitation, therefore state either:	Competent Authorities)
ablution, stores,	pollution etcetc)	E.g.		
workshops, processing		Modify through alternative method.	Upon cessation of the individual activity	
plant, storm water control,		Control through noise control	or.	
berms, roads, pipelines,		Control through management and monitoring	Upon the cessation of mining, bulk	
power lines, conveyors,		Remedy through rehabilitation	sampling or prospecting as the case may	
etcetcetc.).			be.	
Clearance of vegetation	Loss or fragmentation of	Existing vegetation	Duration of operation	The implementation of the
	habitats	Vegetation removal must be limited to the mining site.		recommended mitigation measures
		2. Vegetation to be removed as it becomes necessary rather than		will result in the minimisation of
		removal of all vegetation throughout the site in one step.		impacts to acceptable standards,
		3. No vegetation to be used for firewood.		thereby ensuring compliance with
		4. Exotic and invasive plant species should not be allowed to		NEMA and Duty of Care as prescribed
		establish, if the development is approved.		by NEMA.
		5. There should be a preconstruction walk-through of the		
		development footprint/project site in order to locate individuals of		
		plant species of conservation concern. A search and rescue		
		exercise must be done to locate and relocate any protected		
		species to a suitable and similar habitat where these plants can		
		grow without any disturbance;		

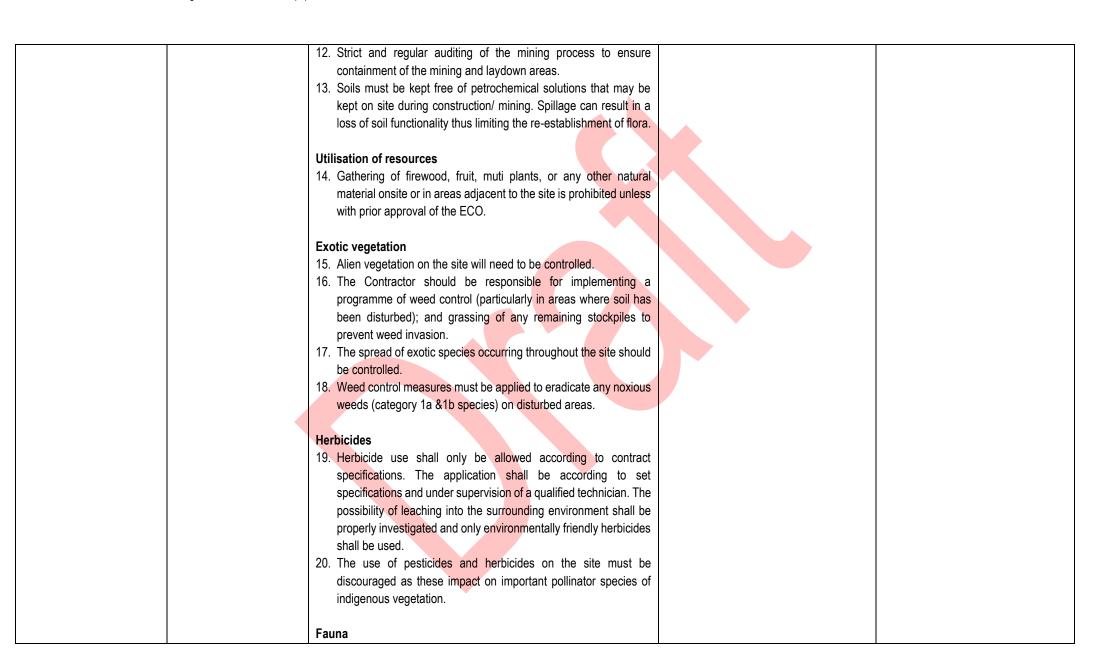
 In case protected trees are found permits must be obtained from the relevant department/s to remove these individuals. The contractor must apply for these permits in a phased manner as mining proceeds.

### Rehabilitation

- All damaged areas shall be rehabilitated upon completion of the contract.
- Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction.
- 3. All natural areas impacted during construction/mining must be rehabilitated with locally indigenous grasses typical of the representative botanical unit.
- Rehabilitation must take place in a phased approach as soon as possible.
- Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for reseeding.
- 6. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.
- 7. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.

## **Demarcation of mining area**

- 8. All plants not interfering with mining operations shall be left undisturbed clearly marked and indicated on the site plan.
- 9. The mining area must be well demarcated and no construction activities must be allowed outside of this demarcated footprint.
- 10. Vegetation removal must be phased in order to reduce impact of construction mining.
- 11. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.



		<ol> <li>Rehabilitation to be undertaken as soon as possible after mining has been completed.</li> <li>No trapping or snaring to fauna on the construction/mining site should be allowed.</li> <li>No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</li> <li>Any fauna threatened by the construction and operation activities should be removed to safety by the ECO or appropriately qualified environmental officer.</li> <li>All construction vehicles should adhere to a low speed limit (&lt;30km/h) to avoid collisions with susceptible species such as snakes and tortoises.</li> <li>If trenches need to be dug for electrical cabling or other purposes, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are exposed should contain soil ramps allowing fauna to escape the trench.</li> </ol>		
Mining Sand (QY) – excavations	Loss of topsoil	<ol> <li>The Contractor should, prior to the commencement of earthworks determine the average depth of topsoil, and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction/mining and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas.</li> <li>Care must be taken not to mix topsoil and subsoil or any other material, during stripping.</li> <li>The topsoil must be conserved on site in and around mining permit area.</li> <li>Subsoil and overburden in the mining area should be stockpiled separately to be returned for backfilling in the correct soil horizon order.</li> <li>If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending</li> </ol>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

	on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases.  6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding.  7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager.  Establish an effective record keeping system for each area where soil is disturbed for mining purposes. These records should be included in environmental performance reports, and should include all the records below.  Record the GPS coordinates of each area.  Record the GPS coordinates of where the topsoil is stockpiled.  Record the date of cessation mining activities at the particular site.  Photograph the area on cessation of mining activities.  Record date and depth of re-spreading of topsoil.  Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time.		
Erosion	<ol> <li>An effective system of run-off control should be implemented, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion.</li> <li>Periodical site inspection should be included in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence of any erosion on site or downstream.</li> </ol>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

3.	Implement an effective system of run-off control, where it is
	required, that collects and safely disseminates run-off water from
	all hardened surfaces and prevents potential down slope erosion.
4.	Monitor the area regularly after larger rainfall events to determine

- where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly
- 5. Wind screening and stormwater control should be undertaken to prevent soil loss from the site.
- 6. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion.
- 7. Other erosion control measures that can be implemented are as follows:
  - Brush packing with cleared vegetation
  - Mulch or chip packing
  - Planting of vegetation
  - Hydroseeding/hand sowing
- 8. Sensitive areas need to be identified prior to construction/mining so that the necessary precautions can be implemented.
- 9. All erosion control mechanisms need to be regularly maintained.
- 10. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces.
- 11. Retention of vegetation where possible to avoid soil erosion.
- 12. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time.
- 13. Re-vegetation of disturbed surfaces should occur immediately after construction/mining activities are completed. This should be done through seeding with indigenous grasses.
- 14. No impediment to the natural water flow other than approved erosion control works is permitted.
- 15. To prevent stormwater damage, the increase in stormwater runoff resulting from construction/mining activities must be estimated and the drainage system assessed accordingly. A drainage plan

	must be submitted to the Engineer for approval and must include		
	the location and design criteria of any temporary stream		
	crossings.		
	16. Stockpiles not used in three (3) months after stripping must be		
	seeded/backfilled to prevent dust and erosion.		
Air Pollution	Dust control	Duration of operation	The implementation of the
	1. Wheel washing and damping down of un-surfaced and un-		recommended mitigation measures
	vegetated areas.		will result in the minimisation of
	Retention of vegetation where possible will reduce dust travel.		impacts to acceptable standards,
	3. Clearing activities must only be done during agreed working times		thereby ensuring compliance with
	and permitting weather conditions to avoid drifting of sand and		NEMA and Duty of Care as prescribed
	dust into neighbouring areas.		by NEMA.
	4. Damping down of all exposed soil surfaces with a water bowser		
	or sprinklers when necessary to reduce dust.		
	5. The Contractor shall be responsible for dust control on site to		
	ensure no nuisance is caused to the neighbouring communities.		
	6. A speed limit of 30km/h must not be exceeded on site.		
	7. Any complaints or claims emanating from the lack of dust control		
	shall be attended to immediately by the Contractor.		
	8. Any dirt roads that are utilised by the workers must be regularly		
	maintained to ensure that dust levels are controlled.		
	Odour control		
	9. Regular servicing of vehicles in order to limit gaseous emissions.		
	10. Regular servicing of onsite toilets to avoid potential odours.		
	Rehabilitation		
	11. The Contractor should commence rehabilitation of exposed soil		
	surfaces as soon as practical after completion of earthworks.		
	Fire prevention		
	12. No open fires shall be allowed on site under any circumstance. All		
	cooking shall be done in demarcated areas that are safe and		
	cannot cause runaway fires.		
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	13. The Contractor shall have operational fire-fighting equipment		
	available on site at all times. The level of firefighting equipment		
	must be assessed and evaluated through a typical risk		
	assessment process.		
Noise	1. The mining activities must aim to adhere to the relevant noise	Duration of operation	The implementation of the
	regulations and limit noise to within standard working hours in		recommended mitigation measures
	order to reduce disturbance of dwellings in close proximity to the		will result in the minimisation of
	development.		impacts to acceptable standards,
	2. Pans, power plants, crushers, workshops and other noisy fixed		thereby ensuring compliance with
	facilities should be located well away from noise sensitive areas.		NEMA and Duty of Care as prescribed
	Once the proposed final layouts are made available by the		by NEMA.
	Contractor(s), the sites must be evaluated in detail and specific		
	measures designed in to the system.		
	3. Truck traffic should be routed away from noise sensitive areas,		
	where possible.		
	4. Noise levels must be kept within acceptable limits.		
	5. Noisy operations should be combined so that they occur where		
	possible at the same time.		
	6. Mine workers to wear necessary ear protection gear.		
	7. Noisy activities to take place during allocated hours.		
	Noise from labourers must be controlled.		
	9. Noise suppression measures must be applied to all equipment.		
	Equipment must be kept in good working order and where		
	appropriate fitted with silencers which are kept in good working		
	order. Should the vehicles or equipment not be in good working		
	order, the Contractor may be instructed to remove the offending		
	vehicle or machinery from the site.		
	10. The Contractor must take measures to discourage labourers from		
	loitering in the area and causing noise disturbance. Where		
	possible labour shall be transported to and from the site by the		
	Contractor or his Sub-Contractors by the Contractors own		
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	transport.		
	11. Implementation of enclosure and cladding of processing plants.		

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	12. Applying regular and thorough maintenance schedules to		
	equipment and processes. An increase in noise emission levels		
	very often is a sign of the imminent mechanical failure of a		
	machine.		
Impact on potential	1. Any finds must be reported to the nearest National Monuments	Duration of operation	The implementation of the
cultural, heritage artefacts	office to comply with the National Heritage Resources Act (Act No		recommended mitigation measures
and fossils.	25 of 1999) and to DEA.		will result in the minimisation of
	2. Local museums as well as the South African Heritage Resource		impacts to acceptable standards,
	Agency (SAHRA) should be informed if any artefacts/ fossils are		thereby ensuring compliance with
	uncovered in the affected area.		NEMA and Duty of Care as prescribed
	3. The Contractor must ensure that his workforce is aware of the		by NEMA.
	necessity of reporting any possible historical, archaeological or		
	palaeontological finds to the ECO so that appropriate action can		
	be taken.		
	4. Known sites should be clearly marked in order that they can be		
	avoided. The workeforce should also be informed that fenced-off		
	areas are no-go areas.	Y The second sec	
	5. The ECO must also survey for heritage and palaeontological		
	artefacts during ground breaking and digging or drilling. He/she		
	should familiarise themselves with formations and its fossils or a		
	palaeontologist should be appointed during the digging and		
4	excavation phase of the development.		
	6. All digging, excavating, drilling or blasting activities must be		
	stopped if heritage and/or palaeontological artefacts are		
	uncovered and a specialist should be called in to determine proper		
	management, mitigation, excavation and/or collecting measures.		
	7. Any discovered artefacts or fossils shall not be removed under		
	any circumstances. Any destruction of a site can only be allowed		
	once a permit is obtained and the site has been mapped and		
	noted. Permits shall be obtained from SAHRA should the		
	proposed site affect any world heritage/palaeontology sites or if		
	any heritage/palaeontology sites are to be destroyed or altered.		
	8. Under no circumstances shall any artefacts be removed,		
	destroyed or interfered with by anyone on the site; and contractors		

and workers shall be advised of the penalties associated with the	
unlawful removal of cultural, historical, archaeological or	
palaeontological artefacts, as set out in the NHRA (Act No. 25 of	
1999), Section 51. (1).	
9. If anything of Archaeological and/or paleontological significance	
is found during the construction and operational phase of the	
mine the following applies:	
NHRA 38(4)c(i) – If any evidence of archaeological sites or	
remains (e.g. remnants of stone-made structures, indigenous	
ceramics, bones, stone artefacts, ostrich eggshell fragments,	
charcoal and ash concentrations), fossils or other categories of	
heritage resources are found during the proposed development,	
SAHRA APM Unit (021 462 5402) must be alerted as per section	
35(3) of the NHRA. Non-compliance with section of the NHRA is	
an offense in terms of section 51(1)e of the NHRA and item 5 of	
the Schedule;	
NHRA 38(4)c(ii) – If unmarked human burials are uncovered, the	
SAHRA Burial Grounds and Graves (BGG) Unit (012 320 8490),	
must be alerted immediately as per section 36(6) of the NHRA.	
Non-compliance with section of the NHRA is an offense in terms	
of section 51(1)e of the NHRA and item 5 of the Schedule;	
NHRA 38(4)e – The following conditions apply with regards to the	
appointment of specialists: i) If heritage resources are uncovered	
during the course of the development, a professional	
archaeologist or palaeontologist, depending on the nature of the	
finds, must be contracted as soon as possible to inspect the	
heritage resource. If the newly discovered heritage resources	
prove to be of archaeological or palaeontological significance, a	
Phase 2 rescue operation may be required subject to permits	
issued by SAHRA;	
If fossil remains or trace fossils are discovered during any phase of	
construction, either on the surface or exposed by excavations the	

Chance Find Protocol must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a paleontologist.

### **Chance Find Procedure**

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS coordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.

	<ul> <li>Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.</li> <li>The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sandbags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.</li> <li>In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.</li> <li>Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.</li> </ul>		
Waste Management	<ol> <li>Litter management</li> <li>Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction/mining site.</li> <li>The Contractor shall supply waste collection bins where such is not available and all solid waste collected shall be disposed of at registered/licensed landfill.</li> <li>Good housekeeping practices should be implemented to regularly maintain the litter and rubble situation on the construction/mining site.</li> <li>If possible and feasible, all waste generated on site must be separated into glass, plastic, paper, metal and wood and recycled. An independent contractor can be appointed to conduct this recycling.</li> <li>Littering by the employees of the Contractor shall not be allowed under any circumstances. The ECO shall monitor the neatness of the work sites as well as the Contractor campsite.</li> </ol>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

- Skip waste containers should be maintained on site. These should be kept covered and arrangements made for them to be collected regularly.
- All waste must be removed from the site and transported to a landfill site promptly to ensure that it does not attract vermin or produce odours.
- 8. Where a registered waste site is not available close to the construction/mining site, the Contractor shall provide a method statement with regard to waste management.
- A certificate of disposal shall be obtained by the Contractor and kept on file, if relevant.
- 10. Under no circumstances may solid waste be burnt on site.
- 11. All waste must be removed promptly to ensure that it does not attract vermin or produce odours.

#### Hazardous waste

- 12. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of offsite at a licensed landfill site, where practical. Incineration may be used where relevant.
- 13. Contaminants to be stored safely to avoid spillage.
- 14. Machinery must be properly maintained to keep oil leaks in check.
- 15. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction/mining and any spills shall immediately be cleaned up and all affected areas rehabilitated.

#### Sanitation

- 16. The Contractor shall install mobile chemical toilets on the site.
- 17. Staff shall be sensitised to the fact that they should use these facilities at all times. No indiscriminate sanitary activities on site shall be allowed.
- 18. Toilets shall be serviced regularly and the ECO shall inspect toilets regularly.

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		19. Toilets should be no closer than 50m or above the 1:100 year
		flood line from any natural or manmade water bodies or drainage
		lines or alternatively located in a place approved of by the
		Engineer.
		20. Under no circumstances may open areas, neighbours fences or
		the surrounding bush be used as a toilet facility.
		21. The construction of "Long Drop" toilets is forbidden, but rather
		toilets connected to the sewage treatment plant.
		22. Potable water must be provided for all construction staff.
		Remedial actions
		23. Depending on the nature and extent of the spill, contaminated soil
		must be either excavated or treated on-site.
		24. Excavation of contaminated soil must involve careful removal of
		soil using appropriate tools/machinery to storage containers until
		treated or disposed of at a licensed hazardous landfill site.
		25. The ECO must determine the precise method of treatment for
		polluted soil. This could involve the application of soil absorbent
		materials as well as oil-digestive powders to the contaminated
		soil.
		26. If a spill occurs on an impermeable surface such as cement or
		concrete, the surface spill must be contained using oil absorbent
		material.
		27. If necessary, oil absorbent sheets or pads must be attached to
		leaky machinery or infrastructure.
		28. Materials used for the remediation of petrochemical spills must be
		used acc <mark>ording to product specifications</mark> and guidance for use.
		29. Contaminated remediation materials must be carefully removed
		from the area of the spill so as to prevent further release of
		petrochemicals to the environment, and stored in adequate
		containers until appropr <mark>iate d</mark> isposal.
Water Use and Quality	Water pollution	Water Use
		1. Develop a sustainable water supply management plan to
		minimise the impact to natural systems by managing water use,

- avoiding depletion of aquifers and minimising impacts to water users.
- 2. Water must be reused, recycled or treated where possible.

## **Water Quality**

- 3. The quality and quantity of effluent streams discharged to the environment including stormwater should be managed and treated to meet applicable effluent discharge guidelines.
- Discharge to surface water should not result in contaminant concentrations in excess of local ambient water quality criteria outside a scientifically established mixing zone.
- Efficient oil and grease traps or sumps should be installed and maintained at refueling facilities, workshops, fuel storage depots, and containment areas and spill kits should be available with emergency response plans.

#### Stormwater

- The site must be managed in order to prevent pollution of drains, downstream watercourses or groundwater, due to suspended solids and silt or chemical pollutants.
- 7. Silt fences should be used to prevent any soil entering the stormwater drains.
- 8. Temporary cut off drains and berms may be required to capture stormwater and promote infiltration.
- Promote a water saving mind set with construction/mining workers in order to Contractor ensure less water wastage.
- New stormwater construction must be developed strictly according to specifications from engineers in order to ensure efficiency.
- 11. Hazardous substances must be stored at least 20m from any water bodies on site to avoid pollution.
- 12. The installation of the stormwater system must take place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase.

- 13. Earth, stone and rubble is to be properly disposed of, or utilized on site so as not to obstruct natural water path ways over the site. i.e. these materials must not be placed in stormwater channels, drainage lines or rivers.
- 14. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed.
- 15. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.

## **Groundwater resource protection**

16. Process solution storage ponds and other impoundments designed to hold non fresh water or un-treated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.

### Sanitation

- Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).
- 18. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.

# **Concrete mixing**

 Concrete contaminated water must not enter soil or any natural drainage system as this disturbs the natural acidity of the soil and affects plant growth.

#### Public areas

20. Food preparation areas should be provided with adequate washing facilities and food refuse should be stored in sealed refuse bins which should be removed from site on a regular basis. Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

21. The Contractor should take steps to ensure that littering by
construction workers does not occur and persons should be
employed on site to collect litter from the site and immediate
surroundings, including litter accumulating at fence lines.
22. No washing or servicing of vehicles on site.

Mechanisms for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon, including

- H) MONITORING OF IMPACT MANAGEMENT ACTIONS
- I) MONITORING AND REPORTING FREQUENCY
- J) RESPONSIBLE PERSONS
- K) TIME PERIOD FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
- L) MECHANISM FOR MONITORING COMPLIANCE

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
Clearance of vegetation	Loss or fragmentation of habitats	<ul> <li>Conduct regular internal audits</li> <li>Conduct regular external audits</li> </ul>	<ul> <li>Environmental Manager</li> <li>Suitable qualified environmental auditor</li> </ul>	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Mining of the applied for minerals	Loss of topsoil Erosion Air Pollution Noise Impact on potential cultural, heritage artefacts and fossils	<ul> <li>Conduct regular internal audits</li> <li>Conduct regular external audits</li> </ul>	<ul> <li>Environmental Manager</li> <li>Suitable qualified environmental auditor</li> </ul>	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Waste management	Pollution	<ul> <li>Conduct regular internal audits</li> <li>Conduct regular external audits</li> </ul>	<ul> <li>Environmental Manager</li> <li>Suitable qualified environmental auditor</li> </ul>	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a

Milnex CC: BAR291MP – BAR & EMPr: Proposed Mining Permit for the mining of Sand (QY) including associated infrastructure, structure and earthworks on a certain 5ha area on a certain portion of the Remaining Extent & Portion 3 of the farm Buffelshoek 351, Registration Division: KQ, Limpopo Province.

				suitably qualified auditor on an annual basis.  Reports should be made available to the competent authority if required.
Water Use and Quality	Water pollution	<ul> <li>Conduct regular internal audits</li> <li>Conduct regular external audits</li> </ul>	<ul> <li>Environmental Manager</li> <li>Suitable qualified environmental auditor</li> </ul>	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.

## M) THE FREQUENCY OF THE SUBMISSION OF THE PERFORMANCE ASSESSMENT REPORT.

External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the Competent Authority if required.

## N) ENVIRONMENTAL AWARENESS PLAN

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

Impulse Mining (Pty) Ltd will implement an Environmental Awareness Plan which will include various mechanisms for informing employees of environmental risks resulting from their work, including:

- Induction training for full –time staff and contractors;
- In-house training sessions to be held with relevant employees;
- On the job training regarding environmental issues
- Training and skills development

The above measures will be implemented through an Environmental Communication Strategy to be implemented.

See the attached Appendix 10 for the Awareness plan

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

**Impulse Mining (Pty) Ltd** will implement an incident reporting and reporting procedure in order to identify risks timeously and implement actions to avoid or minimise environmental impacts.

# O) SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

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

No specific information requirements have been detailed by the Competent Authority.

# -END OF THE REPORT-