



18 August 2015
483383/jord/1508012

Attention: Interested and Affected Party

Dear Interested and Affected Party

Feedback on the Application for the Amendment to the Environmental Management Programme (EMPR) for South Coast Stone Crushers, Margate, KwaZulu-Natal

In November 2014 Interested and Affected Parties (IAP's) were notified of South Coast Stone Crushers' (SCSC's) intent to update the approved Environmental Management Programme Report (EMPR) for the Margate quarry. In addition, SCSC proposed to amend the EMPR to make provision for mining an additional area to the west of the quarry. The proposed update and revision of the EMPR were at that time, subject to the requirements of the Minerals and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA).

The update of the EMPR is necessitated by the fact that the SCSC EMPR was last revised in 2000 and as such the information and management measures are outdated. The revision of the EMPR is necessitated as SCSC is proposing to extend the existing mining area by an additional 13 hectares in a westerly direction, in an effort to align the benches and optimise the available mine area.

On 04 December 2014 amendments to the National Environmental Management Act (No. 107 of 1998) (NEMA) and its associated Environmental Impact Assessment (EIA) Regulations were gazetted. The amendments had implications for the amendment of SCSC's EMPR as EMPR's for mines were previously subject to the requirements of the MPRDA, but are now subject to the requirements of the NEMA. The implication of the change is that the amendment to the EMPR will need to conform to the requirements as provided in Appendix 4 of the NEMA EIA Regulations. Under the MPRDA, an Environmental Management Programme Report (EMPR) referred to a single document in which impacts were assessed and an EMPR was documented. Under NEMA, the term Environmental Management Programme report (EMPr) refers to a stand-alone report documenting an EMPr following an assessment of all potential impacts. Although the legislation governing EMPR's/EMPr's has changed, the competent Authority remains the Department of Mineral Resources (DMR).

In order to clarify the legislative changes and associated requirements SRK Consulting (SRK) met with the DMR on 03 March 2015 to discuss the format for the update of the EMPR. It was decided that a single EMPr, which covers current operations and proposed extensions to the mine area (Appendix A), would be the most practical option. The compilation of a single updated EMPr, in the NEMA EMPr format will ensure uniformity in management and monitoring measures and eliminate user confusion brought about by two separate EMPR's under different sets of legislation.

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Subsequent to the meeting with DMR, SCSC commissioned specialist studies to inform an Assessment Report to be compiled for the entire SCSC mining area. The specialist studies include an Aquatic and Terrestrial Biodiversity Impact Assessment and Wetland Delineation and Assessment. The consolidated Assessment Report will include the findings and recommendations of all specialist studies undertaken and the management and monitoring requirements will be included in the EMPr.

The final document that will be submitted to DMR will be an EMPr with the Assessment Report appended. The EMPr will be made available for public comment prior to being released to DMR for approval. All IAPs will be informed once the EMPr is available for comment.

Please do not hesitate to contact the undersigned should you have any queries or comments.

Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd



R. Bellusci
Environmental Scientist



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Principal Scientist

Appendix A: Maps



SOUTH COAST STONE CRUSHERS: PROGRESSIVE REHABILITATION MAP

Key:

- Current Mining Area
- Proposed Mining Area (2015- 2020)
- Proposed Mining Area (2020 – 2036)
- Rehabilitation Zone (2015)



Data Source:	
Scale: 1:25 000	
Projection: TM	Datum: 11164
Central Meridian/Zone: Lo 31	
Date: 18/11/2014	Compiled by: ALLK
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