



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

BASIC ASSESSMENT REPORT
And
ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

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

NAME OF APPLICANT: THE SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED

TEL NO: 012 844-8000

FAX NO: 012 844-8200

POSTAL ADDRESS: P O Box 415, Pretoria, 0001

PHYSICAL ADDRESS: 48 Tambotie Avenue, Val De Grace, Pretoria

FILE REFERENCE NUMBER SAMRAD:

FILE REFERENCE NUMBER SAMRAD:

BORROW PIT PB 1: PORTION 0 (REMAINING EXTENT) OF THE FARM LUKAU 127 JS

1. IMPORTANT NOTICE

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

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

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

It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or a permit are submitted in the exact format of, and provide all the information required in terms of, this template. Furthermore please be advised that failure to submit the information required in the 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.

2. Objective of the basic assessment process

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

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

PART A

SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

3. Contact Person and correspondence address

a) Details of

(i) Details of the EAP

Name of the Practitioner: Dr Josephine Bothma from Chameleon Environmental

Tel No.: 012 809-1704 or 082 571 6920

Fax No.: 086 6855 080

E-mail address: ce.j@mwebbiz.co.za

(ii) Expertise of the EAP.

(1) The qualifications of the EAP (with evidence).

PhD in Environmental Management. Please find proof of qualifications of EAP in Appendix A.

(2) Summary of the EAP's past experience

(In carrying out the Environmental Impact Assessment Procedure)

The EAP that prepared this report is Dr J Bothma from Chameleon Environmental. The Environmental Assessment Practitioner (EAP) has the appropriate skills and experience to undertake the required studies for the proposed project. Dr Bothma has:

- Experience in environmental studies for borrow pits and quarries.
- The EAP is registered as an Environmental Assessment Practitioner with EAPSA with registration number 0082/06.
- Proven ability to timeously produce thorough, readable and informative documents.
- Adequate recording and reporting systems to ensure the preservation of all data gathered.
- A good working knowledge of all relevant and applicable policies, legislation, guidelines, norms and standards.
- The EAP does not have any links to engineering firms, construction companies, or financial institutions, and would be able sign the required declarations of independence to be submitted to the relevant environmental authorities.

Dr Bothma has a PhD in Environmental Management with extensive experience in the environmental field. Dr Bothma is a founder member of Chameleon Environmental since August 2006, a specialist environmental consulting company based in Pretoria, South Africa but operates nationwide. The company provides a broad range of environmental consulting services to the public and private sectors.

She has:

- » Thirty-two (32) years' experience in the environmental field
- » Twenty-two (22) years' experience in Project Management
- » Project management of large environmental assessment and environmental management projects.

b) Location of the overall Activity.

Farm Name:	Portion 0 (Remaining Extent) of the Farm Lukau No 127 JS
Application area (Ha)	5.4 ha
Magisterial district:	Groblersdal
Distance and direction from nearest town	Approximately 26 Km North East of Groblersdal City Centre
21 digit Surveyor general code for each farm portion	T0JS00000000012700000

c) Locality map
(show nearest town, scale not smaller than 1:250000).

Please see locality map of the borrow pit in Appendix B.

d) Description of the scope of the proposed overall activity.

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

Please refer to Appendix C of the proposed borrow pit and infrastructure to be placed on site.

(i) Listed and specified activities

<p>NAME OF ACTIVITY</p> <p>(E.g. For Prospecting – drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc</p> <p>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, etc...etc...etc.)</p>	<p>Aerial extent of the Activity</p> <p>Ha or m²</p>	<p>LISTED ACTIVITY</p> <p>Mark with an X where applicable or affected.</p>	<p>APPLICABLE LISTING NOTICE</p> <p>(GNR 544, GNR 545 or GNR 546)</p>												
<p>A new borrow pit will be opened on Portion 0 (remaining extent) of the Farm Lukau No 127 JS.</p> <p>Gravel material will be mined from the borrow pit.</p> <p>Access to the borrow pit will be directly from the R574 to the borrow pit.</p> <p>Opencast mining will take place as it is a borrow pit to be mined. Borrow pit excavations will, therefore be present.</p> <p>The following mining components will also be found on site:</p> <ul style="list-style-type: none"> - Temporary toilets, - Generator and fuel storage, - Stockpiles: Subsoil, overburden, spoil, topsoil, - Stockpiles, - Weigh bridge; - Temporary offices. <p>The mined gravel material will be loaded and hauled to the R574 close to the borrow pit site.</p> <p>Blasting will be undertaken in the borrow pit should a bedrock be encountered.</p>	<p>5.4 ha (Actual mining area 1.2ha)</p> <table border="1" data-bbox="635 752 906 1375"> <thead> <tr> <th>Mining Component</th> <th>Area in m²</th> </tr> </thead> <tbody> <tr> <td>Temporary toilets</td> <td>15</td> </tr> <tr> <td>Generator and fuel storage</td> <td>50</td> </tr> <tr> <td>Stockpiles: Subsoil, overburden, spoil, topsoil</td> <td>800</td> </tr> <tr> <td>Gravel stockpiles</td> <td>1200</td> </tr> <tr> <td>Temporary offices</td> <td>300</td> </tr> </tbody> </table>	Mining Component	Area in m ²	Temporary toilets	15	Generator and fuel storage	50	Stockpiles: Subsoil, overburden, spoil, topsoil	800	Gravel stockpiles	1200	Temporary offices	300	<p>x</p>	<p>Activities 21, 27 and 28</p>
Mining Component	Area in m ²														
Temporary toilets	15														
Generator and fuel storage	50														
Stockpiles: Subsoil, overburden, spoil, topsoil	800														
Gravel stockpiles	1200														
Temporary offices	300														

(ii) Description of the activities to be undertaken

(Describe Methodology to be employed, including the type of commodity to be prospected/mined and for a linear activity, a description of the route of the activity)

The South African National Roads Agency SOC Limited intends to open a new gravel borrow pit approximately 26 Km North East of Groblersdal City Centre within the boundaries of the Elias Motsoaledi Local Municipality and the Sekhukhune District Municipality. The borrow pit is located on Portion of the Farm Lukau No 127 JS. The land belongs to the Republic of South Africa.

The actual area to be mined will be 1.2 ha in extent but the entire fenced area including the stockpiles, offices, toilets will be approximately 5.4 ha in extent.

An amount of approximately 70 000m³ G7 and 20 000 m³ G9 material will be mined from the borrow pit for the upgrade of the R574. This quantity might increase as additional work in the area is secured. The depth of the borrow pit should not exceed 5m in depth.

Opencast mining will take place as it is a borrow pit to be mined.

The following mining components will be found on site:

- Temporary toilets,
- Generator and fuel storage,
- Stockpiles: Subsoil, overburden, spoil, topsoil,
- Gravel stockpiles,
- Weigh bridge,
- Temporary offices.

The gravel material mined will be stockpiled within the borrow pit and hauled to the R574 close to the borrow pit. The material will be used for the upgrade of the R574 in the area.

Blasting will be undertaken in the borrow pit.

The following process will be undertaken during the mining operation:

a. Vegetation Stripping

All vegetative material would be retained to ensure proper vegetation establishment during the rehabilitation phase. The vegetation material from the area to be mined would be stripped by a bulldozer and stockpiled for use during the rehabilitation phase.

b. Topsoil Stripping

All topsoil from the area to be mined would be stripped and stockpiled by a bulldozer for redistribution over the site during the rehabilitation phase. Overburden and coarse material shall be placed concurrently in the excavations or stored adjacent to the excavation, if practicable, to be used as backfill material once the gravel has been excavated. All topsoil, subsoil and vegetative material to be stockpiled for use during the rehabilitation phase.

c. Opencast Mining

The required gravel material will be excavated by an excavator and taken to the R574 by trucks. Excavations shall take place only within the approved demarcated mining area.

e) Policy and Legislative Context

<p>APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT (a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process)</p>	<p>REFERENCE WHERE APPLIED</p>	<p>HOW DOES THIS DEVELOPMENT COMPLY WITH AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT (E.g. In terms of the National Water Act a Water Use Licence has/ has not been applied for)</p>
<p>NEMA, EIA Regulations 2014, as amended GN R. 983</p>	<p>Activities 21, 27 and 28 GNR. 983</p>	<p>Closure objectives included in BAR. Ecological study undertaken for the project.</p>
<p>National Environmental Management Act, 1998 (Act No. 107 of 1998) The National Environmental Management Act, 1998 (Act No. 107 of 1998): [NEMA] was enacted in November 1998. NEMA provides for cooperative governance by establishing principles for decision-making on matters affected the environment, institutions that will promote co-operative governance and procedures for coordinating environmental functions, public participation and sustainable development.</p>	<p>General objectives of Integrated Environmental Management as set out in section 23 of NEMA taken into account</p>	<p>Objectives of NEMA taken into account in BAR</p>
<p>Regulation 15 of the Conservation Act of Agricultural Resources Act, 1983 (Act 43 of 1983)</p>	<p>Ecological study Alien vegetation identification on site</p>	<p>Ecological study undertaken for the project</p>
<p>Disaster Management Act, 2002 (Act 57 of 2002)</p>	<p>Covid-19 Directions issued for PPP</p>	<p>Covid-19 Directions issued for PPP taken into account during Public Participation Process</p>
<p>National Heritage Resource Act 1999 (Act No. 25 of 1999) and KwaZulu-Natal Heritage Act (Act 4 of 2008) Standards and Regulations South African Heritage Resources Agency (SAHRA) Minimum Standards;</p>	<p>Development exceeding 5000 sq m required approval from SAHRA. Heritage study</p>	<p>Heritage Study undertaken for the borrow pit</p>
<p>The National Water Act (Act No. 36 of 1998) for water uses as defined in</p>	<p>Any stream crossings and</p>	<p>Any stream crossings or wetlands applicable to the</p>

<p>section 21 (c) and section 21 (i).</p> <p>The application for a General Authorisation or Water Use License (WUL) in terms of the National Water Act, 1998.</p>	<p>application of a general authorization or WUL at the Department of Water and Sanitation</p>	<p>borrow pit.</p>
--	--	--------------------

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).

Gravel material is an essential material for road building purposes. The gravel material is obtained from of the following sources:

- From commercial sources;
- From excavations within the road reserve;
- From excavations of mining areas and quarries outside the road reserve.

During the design stage of the project, the consulting engineers to the project investigated the demand for gravel material as well as the most suitable commercial sources in close proximity to the project.

It was found that no commercial sources are available in close proximity to the site that is suitable for the road works. The use of only commercial sources of gravel/aggregates for a project of this magnitude would also be inordinately expensive, and would render the project unviable. It was therefore, decided that investigations would be conducted to obtain additional rock or gravel for the project from mining area in close proximity to the road project.

The R574 forms part of the strategic national road network. The volume of heavy vehicles on the R574 is expected to increase significantly over the next 20 years. The road is also a prominent route to transport produce to Mozambique for export purposes.

Traffic volumes and design principals determine that the road needs to be maintained to ensure the safety of the traveling public. The additional traffic lanes are proposed to accommodate increased capacity and reduce congestion and assist traffic flow. The road upgrade will also cater for future traffic demand and support economic growth. This could benefit the communities in the area including local residents, motorists, the road freight industry and its customers.

The upgrade of the road could, therefore, ensure safer driving conditions for the travelling public by enabling vehicles to travel more efficiently and smoothly with less congestion as a result of the additional passing lanes to be constructed that will allow vehicles to safely pass slower moving trucks and vehicles. The proposed opening of the mining areas is, therefore, necessary to ensure the safety of the traveling public. This will also accommodate the predicted increase in traffic volume and avoid high driver frustration.

The mining of the required gravel material is needed for the upgrade of the R574. Should the mining of the areas not be undertaken, the necessary gravel material for the R574 will not be available and the road will not be able to be upgraded and/or expanded. The traveling public could, therefore, experience increasingly unsafe driving conditions.

a. Need and desirability of the activity in the context of the preferred location

The following factors have an impact on the availability of suitable borrow pit areas:

Highly specific rock material is required for the road upgrade, which is found in the vicinity only at the proposed borrow pit site. The following factors have an impact on the availability of suitable gravel material:

- i. This section of the R574 is located in a high rainfall area. The presence of high rainfall in the area determines that most of the material is chemically weathered material that is not suitable for road building (chemical weathered material tends to weather/transform into clay over time). This has a significant impact on the availability of suitable borrow pits and quarries for roadbuilding purposes;
- ii. The area is also covered in agricultural activity further reducing the availability of land for borrow pit purposes;
- iii. Distance from the road (R574) is also a factor and every km that a borrow pit or borrow pit is further away from the road add between R3.5 and R5.0 million in haul cost to the re- construction cost of the R574. If the haul cost becomes excessive the project will not be economically viable to implement;
- iv. Willingness of land owners to sell their land for borrow pit/borrow pit purposes is also a limiting factor.

The aforementioned constraints have a severe impact on the availability of suitable material sources for the upgrade of the R574, to such an extent that it took die Material Specialist more than a year to identify these material sources through a very complex process which included the following:

- i. Geological maps were consulted as part of a desktop study to determine suitable geological areas where road building material can be obtained;
- ii. Extensive site visits were undertaken by specialist to identify suitable material areas;
- iii. Land owners were engaged to obtain permission to test the areas;
- iv. Test pits were excavated and extensive material testing was undertaken to confirm the material quality;
- v. Drilling investigations followed to determine the depth of the material and the quality at depth;
- vi. After confirmation of the material quality drawings were prepared and submitted to the Land Owners and the Environmental Specialist;
- vii. Discussions were undertaken with landowners and where land owners objected with good reason, areas were discarded;
- viii. Final discussions were undertaken with the land owners, including discussions regarding Land acquisition;
- ix. Land acquisition is in process.

g) Motivation for the overall preferred site, activities and technology alternative.

The following are reasons for the preferred site alternative:

- The site is not within a threatened veldtype (ecosystem).
- The site is not within any priority areas, which include protected areas (nature reserves), important bird areas (IBAs) and national protected area expansion strategy (NPAES) focus areas.
- During field investigations no Red Data Listed (RDL) were found.

- The study site is not situated within a Critical Biodiversity Area (CBA).
- There are no ‘high’ sensitive habitats present on site except for the small drainage line and associated riparian zone to the east of the site.
- No red data listed (RDL) fauna or flora species were observed in the study area boundaries.
- There are no obvious fatal flaws in terms of the natural environment.
- The borrow pit has the required aggregate material to be used for the upgrade of the R574.
- The borrow pit is in close proximity to the road upgrade project.
- Discussions were held with the relevant landowner and he does not have any objection to the proposed opening of the borrow pit on the property.

No other site alternative was investigated as geological tests in the surrounding area shows insufficient quality of gravel material for construction purposes.

h) Full description of the process followed to reach the proposed preferred alternatives within the site.

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

i) Details of the development footprint alternatives considered.

With reference to the site plan provided as Appendix 4 and the location of the individual activities on site, provide details of the alternatives considered with respect to:

- (a) The property on which or location where it is proposed to undertake the activity;
 - (b) The type of activity to be undertaken;
 - (c) The design or layout of the activity;
 - (d) The technology to be used in the activity;
 - (e) The operational aspects of the activity; and
 - (f) The option of not implementing the activity.
- a. Geological tests in the surrounding area shows insufficient quality of gravel material for the upgrade of the R574. However, the tests showed sufficient gravel material on Portion 0 of the farm Lukau No 127 JU for the upgrade of the R574.
 - b. Opencast mining will take place as it is a borrow pit to be mined. Borrow pit excavations will, therefore be present.
 - c. There were no environmental restrictions pertaining to the layout of the borrow pit.
 - d. The technology used at the activity will be a bulldozer for stripping the topsoil. An excavator will be used for the opencast mining activities. The excavated gravel material will be taken to the construction site with trucks.
 - e. Open cast mining will be undertaken for the excavation of the gravel material at the borrow pit during the operational phase. The gravel material will be excavated by an excavator and taken to the construction site.
 - f. Should the mining of the gravel not be allowed, the necessary material for the upgrade of the road will not be available and it will not be able to upgrade the R574.

ii) **Details of Public Participation Process Followed**

Describe the process undertaken to consult interested and affected parties including public meetings and 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.

Please refer to the Report on the Results of Consultation in Appendix D.

A public participation process was undertaken in accordance with the EIA Regulations, 2014, as amended.

The public participation and communication process aims to identify issues in order to maximise the social and environmental benefits, and to minimise the social and environmental costs of the proposed project. Interested and affected parties (I&APs) were consulted and afforded the opportunity to participate. The I&APs were informed and involved in the project from the outset in order to promote participation and transparency.

The aim of this public participation process is to achieve the following broad goals:

- identification of all key I&APs and stakeholders;
- the active involvement of all I&APs with respect to decision making;
- an exchange of information relevant to the proposed project through Background Information Documents (BID), consultations and newspaper advertisements.
- the development of an understanding with regards to the broader project objectives and goals and knowledge of the project; and
- the identification of issues and concerns with regards to all potential alternatives associated with the proposed development.

The following approach was followed in undertaking the public participation process:

a. Identification of and Consultation with I&APs

The first step in the public participation process was to identify the key I&APs. A list of the registered I&APs is attached as Appendix D.

b. Advertising

In accordance with the EIA Regulations, 2014, as amended an advertisement was placed requesting I&APs to register their interest in the project. An advertisement was placed in **The Sekhukhune Times of 21 - 27 October 2021**. A copy of the advertisement is included in Appendix D.

c. Site Notice

Site notifications in English in A2 format requesting comments or objections were placed on site on **26 October 2021**. Photographs of the site notice are included in Appendix I.

d. Notification Letter and Background Information Document

Notification letters about the project and a Background Information Document were sent out to the particular Ward Councillor and Government Departments that would be relevant to this project.

e. Comments and Response Report

A comments and response report was drafted that included all the issues raised by the Interested and/or Affected Parties as well as the responses to the issues raised. The Comments and Response report is included in Appendix D.

f. Local Authority Involvement

A letter was forwarded to the Elias Motsoaledi Local Municipality and the Sekhukhune District Municipality. The letters are included in Appendix D.

g. Review of Draft Basic Assessment Report

The Draft Basic Assessment Report was made available to the public for review and comment, within an allocated 30-day period. A copy of the report was available in electronic format.

iii) Summary of issues raised by I&APs

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

Interested and Affected Parties		Date	Issues raised	EAPs response to issues as mandated by the applicant	Section and Paragraph Reference in This report Where the Issues and or Responses were incorporated.
List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.		Comments Received			
<u>AFFECTED PARTIES</u>					
Landowner/s	x				
Department of Rural Development and Land Reform		22 February 2022	No issues raised	No response necessary	None
Lawful occupier/s of the land	x				
Mr Sam Moloko Bakone Batubatse Tribal Authority		23 August 2021	Any projects and developments that is taking place to our constituency is as the legal entity, we are obliged to provide our inputs for the good running of that process. Doing this, we are admonished by the Constitution of our country Government plan action include the integrated development plan. The provision permits society to participate in food faith and be given a platform by those stakeholders in charge to provide those services as stipulated by the Business Act of our country. Our inputs are driven by the following exercise inside:	Thank you for the comments submitted on 23 August 2021. Chameleon Environmental was appointed to undertake the environmental studies for the project only. A Basic Assessment is undertaken for the project that will be submitted to the National Department of Forestry, Fisheries and the Environment (DFFE) for authorisation. The project will be put out to tender once the authorisation is received from DFFE. You need to consult the SANRAL website (www.nra.co.za) for the tender and tender process. Any enquiries regarding the tender or	None required.

			<ul style="list-style-type: none"> • We got full people that are registered with the Department of Trade and Industry; • The company and civil constitution are run by well experienced business minded people. • All the company workers are skilled workers, qualified qualified officials and with qualifications to some positions. • Some of the company have their own employed consultants. • The company has a good record in the field of civil and construction. • In terms of grades we are a good company that have level 4,6,7,8 and 9 at this post in terms of our data system. • Our proposal sustainability is driven by the State facts and aspects. We are also prepared to meet with you for more discussion. • The proposal is mainly for the road from Groblersdal to Nebo. 	employment opportunities should be directed to the applicant (SANRAL).	
Landowners or lawful occupiers on adjacent properties	x				
None		No comments received	No issues raised	No response necessary	None
Municipal councillor	X				
Cllr Mokwane Magdeline Kubane Ward 27		No comments	No issues raised	No response necessary	None required.

		received			
Cllr Mokganyetji Thomas Mareme Ward 24		No comments received	No issues raised	No response necessary	None required.
Cllr Malatji Meriam Nape Ward 29		No comments received	No issues raised	No response necessary	None required.
Cllr Msiza Mothibe Rhodes Ward 29		No comments received	No issues raised	No response necessary	None required.
Municipality	X				
Mr Meshack Kgwale Municipal Manager Elias Motsoaledi Local Municipality		No comments received	No issues raised	No response necessary	None required
Ms Maureen Ntshudisane Municipal Manager Sekhukhune District Municipality		No comments received	No issues raised	No response necessary	None required
Organs of state (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, DWA)	X				
Mr Vusi Maluleke Department of Economic Development, Environment and Tourism		No comments received	No issues raised	No response necessary	None required
Ms Ramatsimele Jacqueline Maisela Head of Department Limpopo Department of Agriculture		No comments received	No issues raised	No response necessary	None required
Mr Dawid Nethengwe (Water Licenses) Department of Water and Sanitation		No comments received	No issues raised	No response necessary	None required
Mr. Sello Maleka The Chief Executive Officer The Limpopo Tourism Agency		No comments received	No issues raised	No response necessary	None required
Mr Fana Hlathi Manager Head Planner for JHB Liquid Telekoms	09 February 2022	Liquid Services are not affected by this	Thanks for letting us know.	None required.	None required

Communities	x	project.			
Mr Sam Moloko Bakone Batubatse Tribal Authority		23 August 2021	<p>Any projects and developments that is taking place to our constituency is as the legal entity, we are obliged to provide our inputs for the good running of that process.</p> <p>Doing this, we are admonished by the Constitution of our country Government plan action include the integrated development plan. The provision permits society to participate in food faith and be given a platform by those stakeholders in charge to provide those services as stipulated by the Business Act of our country.</p> <p>Our inputs are driven by the following exercise inside:</p> <ul style="list-style-type: none"> • We got full people that are registered with the Department of Trade and Industry; • The company and civil constitution are run by well experienced business minded people. • All the company workers are skilled workers, qualified qualified officials and with qualifications to some positions. • Some of the company have their own employed consultants. • The company has a good record in the field of civil and construction. • In terms of grades we are a 	<p>Thank you for the comments submitted on 23 August 2021.</p> <p>Chameleon Environmental was appointed to undertake the environmental studies for the project only. A Basic Assessment is undertaken for the project that will be submitted to the National Department of Forestry, Fisheries and the Environment (DFFE) for authorisation.</p> <p>The project will be put out to tender once the authorisation is received from DFFE. You need to consult the SANRAL website (www.nra.co.za) for the tender and tender process. Any enquiries regarding the tender or employment opportunities should be directed to the applicant (SANRAL).</p>	None required.

			<p>good company that have level 4,6,7,8 and 9 at this post in terms of our data system.</p> <ul style="list-style-type: none"> • Our proposal sustainability is driven by the State facts and aspects. We are also prepared to meet with you for more discussion. • The proposal is mainly for the road from Groblersdal to Nebo. 		
Dept. Land Affairs	X				
Mr Tele Maphotho Chief Director: Land Restitution Support:Department of Rural Development and Land Reform		No response	No issues raised	No response necessary	None
Traditional Leaders					
Mr Sam Moloko Bakone Batubatse Tribal Authority		23 August 2021	See issues raised above	See response above	None required
Dept. Environmental Affairs	X				
Mr Vusi Maluleke Department of Economic Development, Environment and Tourism		No comments received	No issues raised	No response necessary	None
Other Competent Authorities affected	x				
Department of Mineral Resources and Energy		No comments received	No issues raised	No response necessary	None
<u>OTHER AFFECTED PARTIES</u>					
None					
<u>INTERESTED PARTIES</u>					
None					

iv) The Environmental attributes associated with the alternatives (The environmental attributes described must include socio-economic, social, heritage, cultural, geographical, physical and biological aspects)

(1) Baseline Environment

(a) Type of environment affected by the proposed activity.

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

(i) Topography

The topography of the region is that of undulating plains and hills, with a few shallow broad valleys in which small streams or drainage lines flow. The average height above sea level for the borrow pit site is approximately 1410m. The lowest point along the R574 is at Bloed River, near the start of the route, at an elevation above average sea level of 915 m. From the start of the route at KM 0,0 the road continues to climb ever higher, while undulating up and down small hills and eventually onto a large plateau. The highest point is at Morwaneng, at the end of the route, where the elevation is about 1 632 m. The average slope (gradient) across the R574 is approximately 3,4% (i.e. 3,4 m across a 100 m area) (Flori Scientific Services, 2022).

(ii) Climate

The study site is situated within the summer rainfall region of South Africa and within the medium rainfall region of 401 mm to 600 mm per annum. The average annual rainfall for the nearby Town of Groblersdal is approximately 497 mm (en.climate-data.org). The average annual rainfall across the Sekhukhune District Municipality is typically below 600 mm. Sekhukhune district is characterised by relatively poor and unreliable rainfall, frequent droughts and periodic flooding (www.researchgate.net).

The climate is warm to hot during the summer months, with some days becoming very hot, while temperatures are typically moderate to cold, but seldom very cold, in winter. The warm summers are long, while the winters are usually short, dry and with mostly clear skies. There are always winter days of colder temperatures with light frost in the early morning hours, especially in the low lying areas around streams and between mountains. The study site is situated within the Temperate Interior Climatic Zone of South Africa, but close to the outer edge of the Cold Interior (Flori Scientific Services, 2022).

(iii) Land Use

The landuse of the study site is open, vacant plots of land that was previously ploughed and cultivated. During site investigations only a small piece was still actively cultivated. The landcover of the general region in which the study site is situated is that of open bushveld, commercial farmlands, small plots of subsistence farming and scattered settlements / townships. The biggest landuse and landcover across the area is that of large and medium sized villages / townships that have over the years extended and merge into each other (Flori Scientific Services, 2022).

(iv) Vegetation

South Africa is divided up into nine major Biomes. The study site and the surrounding area are within the Savanna Biome and the Grassland Biome. The Savanna (Bushveld) Biome is typically characterised by a lower layer of grasses, middle layer of shrubs and an upper layer of trees. The Grassland Biome is

characterised by a dominant lower layer of grasses and forbs, with the middle layer of shrubs and the upper layer of trees mostly absent, except in rocky areas or rocky outcrops (koppies) that are to some extent protected from veldfires.

Mucina & Rutherford (2010) divided the Savanna Biome (Bushveld Biome) into six bioregions, namely: Central Bushveld, Mopane, Lowveld, Sub-Escarpment Savanna, Eastern Kalahari Bushveld; and Kalahari Duneveld. The Grassland Biome is divided into four bioregions, namely: Drakensberg Grassland, Dry Highveld Grassland, Mesic Highveld Grassland, and Sub-Escarpment Grassland. The borrow pits falls within the **Central Bushveld Bioregion** of the Savanna Biome. Within these bioregions the quarry site are within the original extent of the veldtype of **Central Sandy Bushveld**.

The vegetation hierarchy of the study site is shown in Table 1 below.

Table 1: Vegetation hierarchy of the study area

Category Description	Classification
Biome	Savanna & Grassland
Bioregion	Central Bushveld & Mesic Highveld Grassland
Veldtype	Central Sandy Bushveld
Status	Central Sandy Bushveld – Least Concern / Least Threatened

(Flori Scientific Services, 2022).

v) **Vegetation of the Study Area**

The site is a previously cultivated plot of land, with some small areas still been cultivated. There are only a few scattered trees on site (*Vachellia* (Acacia) and *Searsia* (Rhus)), but no protected trees. The years of low level ploughing and the apparent regular burning during winter has left the site degraded and altered with mostly a few common local grasses and a few scattered forbs and weeds. The vegetation is not characteristic of Central Sandy Bushveld, but is best described as old fields(Flori Scientific Services, 2022).

(vi) **Watercourses in the Study Area**

There are no watercourses within the confines of the potential borrow pit site, including seasonal drainage lines and wetlands.

There are six main watercourses (rivers or streams) in the region in which the borrow pits site is situated. Starting from west to east these are: Rulokwane, Puleng, Puleng tributary, Ga-Makatle, Gemsbokspruit tributary and Gemsbokspruit. The two tributaries are unnamed and can be seen as small streams flowing into the main watercourses.

The proposed borrow pit sites is hundreds of metres away from these watercourses and will not impact on them at all. None of these watercourses named above will need to be crossed in order to access the borrow pit site (Flori Scientific Services, 2022).

(vii) **Air Quality**

The region is considered rural and the air quality very good. However, the site is located next to the R574 and the air quality is negatively affected by the traffic on the R574.

(viii) Noise

The current noise levels are high due to the proximity of the R574 close to the site.

(ix) Visual

The borrow pit is visually accessible from the R574.

(x) Sensitive Landscapes

There are no sensitive landscapes associated with the borrow pit.

(xi) Sites of Archaeological and Cultural Interests

There are no graves or any heritage area at the proposed mining area.

(xii) Socio-Economic Aspects

The mining area would have a positive impact on the regional socio-economic structure through its support of the development industry, profit generation contributing to tax revenue, job creation and the skills development of its employees.

The landowner will be compensated by SANRAL for the borrow pit.

(xiii) Cumulative Impacts

The cumulative impacts associated with the establishment of the proposed mining area could be the following:

- Additional traffic on the local road during mining of the area;
- Limited influx of people in the area during mining of the area;
- Additional water and electricity supply to the area - limited, if any.

(b) Description of the current land uses.

The land use of the study site is an open, vacant plot of land that was previously ploughed and cultivated. During site investigations only a small piece was still actively cultivated. The land cover of the general region in which the study site is situated is that of open bushveld, commercial farmlands, small plots of subsistence farming and scattered settlements / townships. The biggest land use and land cover across the area is that of large and medium sized villages / townships that have over the years extended and merge into each other.

(c) Description of specific environmental features and Infrastructure on the site.

The site was not mined before and is not fenced. There is no other infrastructure on site for instance houses or dams.

(d) Environmental and current land use map.
(Show all environmental and current land use features)

Please see map included in Appendix E.

v) Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts

(Provide a list of the potential impacts identified of the activities described in the initial site layout that will be undertaken, as informed by both the typical known impacts of such activities, and as informed by the consultations with affected parties together with the significance, probability, and duration of the impacts. Please indicate the extent to which they can be reversed, the extent to which they may cause irreplaceable loss of resources, and can be avoided, managed or mitigated).

The *potential* impacts associated with the mining area have been identified as the following:

CONSTRUCTION PHASE:

1. Vegetation stripping

Potential Impacts:

- a. Dust Pollution
- b. Soil Erosion
- c. Noise Impact
- d. Water pollution
- e. Visual impact
- f. Terrestrial ecology
- g. Impact on uncovered heritage aspects
- h. Contamination of site due to hydrocarbon spillage
- i. Emissions from heavy vehicles

2. Stripping and stockpiling of topsoil

Potential Impacts:

- a. Clearing of vegetation
- b. Visual intrusion as a result of establishment of the borrow pit
- c. Dust nuisance caused by machinery stripping topsoil
- d. Noise nuisance caused by machinery stripping topsoil
- e. Infestation of weeds and alien vegetation on topsoil heaps
- f. Loss of topsoil due to incorrect storm water management
- g. Contamination of site due to hydrocarbons
- h. Impact on uncovered heritage aspects
- i. Emissions from heavy vehicles

OPERATIONAL PHASE

1. Blasting

Potential Impacts:

- a. Health and safety risk posed by blasting activities
- b. Dust nuisance caused by blasting activities
- c. Noise nuisance caused by blasting activities

2. Excavations

Potential Impacts:

- a. Visual intrusion associated with the excavation activities
- b. Dust nuisance caused by excavation activities
- c. Noise nuisance generated by excavation equipment
- d. Contamination of surface or groundwater due to effluent runoff from excavation
- e. Unsafe working conditions for employees
- f. Potential damage to uncovered cultural and heritage aspects
- g. Contamination of site due to hydrocarbons
- h. Emissions from heavy vehicles
- i. Water pollution

3. Stockpiling and Transporting of gravel material

Potential Impacts:

- a. Visual intrusion associated with the stockpiled material and heavy vehicles transporting the gravel material
- b. Loss of material due to ineffective storm water handling
- c. Dust nuisance from stockpiled material and heavy vehicles transporting material
- d. Degradation of access roads
- e. Noise nuisance caused by heavy vehicles
- f. Contamination of site due to hydrocarbons
- g. Emissions from heavy vehicles
- h. Water pollution

DECOMMISSIONING PHASE and CLOSURE

1. Sloping and landscaping during rehabilitation

Potential Impacts

- a. Soil erosion
- b. Health and safety risk posed by unsloped areas
- c. Dust nuisance caused during sloping and landscaping activities
- d. Noise nuisance caused during sloping and landscaping activities
- e. Contamination of site due to hydrocarbons
- f. Emissions from heavy vehicles

2. Replacing the topsoil and revegetating the disturbed area

Potential Impacts:

- a. Loss of reinstated topsoil due to absence of vegetation
- b. Infestation of the area with weed and invader plants

ALL phases: Proper functioning of sanitation systems

vi) Methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;

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

Potential environmental impacts on the environment will be determined in terms of the following in order to determine the significance of each impact:

Nature:

A brief description of the environmental aspect being impacted upon by a particular action or activity is presented. Also:

- Probability (how likely is it that the impact will occur?)
- Magnitude (how severe will the impact be?)
- Duration (how long will the impact last?)
- Scale of the impact (what size of the area will be affected?)

Thereafter, mitigation measures will be proposed in order to reduce or eliminate negative impacts and enhance positive impacts. The impact of the proposed activity on the environment will be considered for the pre- construction, construction and operational phases. The necessary mitigation measures will be consolidated in the form of an Environmental Management Programme (EMPr).

Assessment of significance – method:

The significance of every environmental impact identified will be determined using the following approach:

In assessing the potential significance of an impact two aspects will be considered:

- i) Occurrence
- ii) Severity

Occurrence will be sub-divided into:

- Probability of occurrence
- Duration of occurrence

Severity will be sub-divided into:

- Magnitude (severity) of impact
- Scale/extent of impact

In order to assess each of these factors for each impact, ranking scales were employed as follows:

Probability:

- 5 - Definite/don't know
- 4 - Highly probable
- 3 - Medium probability
- 2 - Low probability
- 1 - Improbable
- 0 - None

Duration:

- 5 - Permanent
- 4 - Long-term*
- 3 - Medium-term (5-15 years)
- 2 - Short-term (0-5 years)
- 1 - Immediate
- 0 - None

Scale:	Magnitude:
5 – International	10 - Very high/don't know
4 – National	8 - High
3 – Regional	6 - Moderate
2 – Local	4 - Low
1 - Site only	2 - Minor
0 – None	0 - None

*impact ceases after operational life of the activity

Once the above factors had been ranked for each impact, the overall risk (environmental significance) of each impact will be assessed using the following formula: $SP = (\text{magnitude (M)} + \text{duration (D)} + \text{scale(S)}) \times \text{probability (P)}$. The maximum value is 100 significance points (SP). Environmental impacts will be rated as either of High, Moderate or Low significance on the following basis:

- SP greater or the same as 60 indicates high environmental significance;
- SP 31 greater or the same as 59 indicates moderate environmental significance;
- $SP \leq 30$ indicates low environmental significance.

Please see actual assessment in Appendix F.

vii) 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 the advantages and disadvantages of the initial site layout compared to alternative layout options to accommodate concerns raised by affected parties)

The following are reasons for the preferred site alternative on Portion 0 of the Farm Lukau No 127 JS:

- The site is not within a threatened veldtype (ecosystem).
- The site is not within any priority areas, which include protected areas (nature reserves), important bird areas (IBAs) and national protected area expansion strategy (NPAES) focus areas.
- During field investigations no Red Data Listed (RDL) were found.
- The study site is not situated within a Critical Biodiversity Area (CBA).
- There are no 'high' sensitive habitats present on site.
- No red data listed (RDL) fauna or flora species were observed in the study area boundaries.
- There are no obvious fatal flaws in terms of the natural environment.
- The borrow pit has the required aggregate material to be used for the upgrade of the R574.
- The borrow pit is in close proximity to the road upgrade project.
- Discussions were held with the relevant landowner and he does not have any objection to the proposed opening of the borrow pit on the property.

Advantages pertaining to the mining of the borrow pit:

The gravel material will be used for the upgrade of the R574. The opening of the borrow pit could encourage business, industry and investment and assist in alleviating the high unemployment in the region as a whole.

The possible negative impacts associated with the opening of the borrow pit are the possible short term impacts associated with the construction phase i.e.

- a. Dust Pollution
- b. Soil Erosion
- c. Noise Impact
- d. Visual impact
- e. Terrestrial ecology
- f. Impact on uncovered heritage aspects
- g. Contamination of site due to hydrocarbon spillage
- h. Emissions from heavy vehicles
- i. Possible water pollution

With the implementation of the EMPr, the significance of the impacts associated with the opening of the borrow pit is foreseen to be low.

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).

The following measures will be implemented by SANRAL to prevent or remedy any possible pollution or degradation of the environment:

a. Possible dust and air pollution

- Dust will be suppressed through a watering management programme, especially during windy conditions.
- Dust generated will be carefully monitored by the OHS&E and should be suppressed by means of watering regularly.
- Access roads will be watered regularly, especially in the dry winter months and in periods of high wind.
- Vegetation will not be unnecessary stripped.
- Domestic fires will be prohibited on site.
- Heavy vehicle will be serviced regularly to ensure emission control.
- All heavy vehicles, excavators and generators used for the mining will be in good working condition and will be serviced regularly.
- Should a vehicle have a break down, it will be serviced immediately.

b. Soil Erosion

- Topsoil, if any, will be removed over the whole mining area and stored in a perimeter berm. The height of the topsoil berm will not exceed 3m.
- The topsoil berm will be inspected for erosion daily.
- Minimal amounts of topsoil shall be lost due to erosion, either by wind or water. This can be facilitated through the grassing of topsoil stockpiles, where needed.
- Condition of soil in walk or drive areas should be checked daily for erosion.
- Access road condition will be checked daily.
- If erosion is noted at walk and drive areas, access road or topsoil berms, the erosion channel will be fixed by placing cut vegetation, sandbags or rocks within the erosion channel and the cause of the erosion will be mitigated through the creation of runoff channels.

c. Possible Noise Pollution

- The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation.
- Vehicles must be driven at a moderate speed (50 kph) on private roads.
- Noise generated from the trucks that transport the material and the excavator that is used to mine the material shall only be carried out during normal working hours.
- Extended working hours will be in accordance with contract documentation.
- SANRAL shall be obligated to maintain vehicles used at the mining area in a good condition;
- SANRAL will be obliged to ensure that all personnel on site apply occupational health and safety requirements with respect to hearing protection.

d. Possible Visual impact

- Concurrent rehabilitation of the mining area will take place.

- All unused material would be levelled to ensure that the mining area blends back into the existing landscape fabric.
- No stockpiled material is to be retained on site.
- The mining area will be shaped to ensure no stockpiled heaps.
- All stockpiled topsoil and vegetative material will be spread over the bottom of the mining area to ensure proper seed bed for the re-establishment of vegetative growth. Placing a berm of topsoil along the perimeter of the mining site to obscure the visual impact of the excavation.
- Re-vegetation of the mining area after mining operation has ceased.
- The access gravel road will be rehabilitated and the area will be fenced following the mining of the area.

e. Aquatic and Terrestrial Ecology

Construction Phase / Site Establishment Phase:

- During the construction phase all temporary laydown areas, ablution facilities; site offices, etc. must only be within the larger demarcated study area.
- During the initial Construction Phase / site establishment phase existing access roads must be used as far as possible. These roads need to be continually maintained during the construction phase. Keeping in mind that other landowners and inhabitants of the area use some of these roads.
- Ensure small footprint during construction phase.
- All excess materials brought onto site for construction to be removed after construction.
- 32m Buffer zones, from the edge of the banks of all watercourses need to be implemented where necessary.
- No temporary site offices or lay-down areas are allowed within 50m of the edge of any watercourses. Temporary site offices or lay-down areas should be established on level ground and not along any steep hill slopes or gradients. And must be within disturbed areas as far as possible.
- All hazardous materials must be stored appropriately to prevent these contaminants from entering the water environment;
- All excess materials brought onto site for construction must be removed after construction.
- A Site-specific rehabilitation plan are crucial and non-negotiable for the borrow pit site, including access roads. These to be implemented on closure of the borrow pit site. During the active life of the borrow pit routine rehabilitation and upgrade of eroded areas, access roads, etc. must be conducted.

Operational Phase

- No site offices, parking areas, ablution facilities, etc. may be set up outside of the demarcated study area.
- All access roads to the site must be maintained at all times. Many of these roads are gravel / sand public roads used by surrounding farmers and landowners. During the entire operational phase / life of the borrow pit these roads must be maintained and dust-suppression must be used.
- Perimeter fences to be routinely monitored and maintained. Assurances need to be in place that local livestock as well as wild animals will not be able to enter the mining site.
- An Erosion Plan to be implemented and monitored during construction phase and operational phases of the project. Even though the erosion potential is low.
- All hazardous materials must be stored appropriately to prevent these contaminants from entering the soils and natural environment.
- Under no circumstances may farm livestock as well as wild animals be interfered with.

Mine Closure (Rehabilitation)

- All standard borrow pit mining operation procedures and regulations to be implemented. Rehabilitation plan for the borrow pit and general study area must be compiled prior to mine closure and assurances must be given that it will be implemented.
- The rehabilitation will have a positive impact on the site and area, although it will not be able to restore the area back to its original state.

f. Possible Impact on Uncovered Cultural or Archaeological site

- If an artefact or grave on-site is uncovered, work in the immediate vicinity shall be stopped immediately and it should immediately be reported to a heritage consultant so that an investigation and evaluation of the finds can be made. The Contractor shall take reasonable precautions to prevent any person from removing or damaging any such article.
- The South African Heritage Resources Agency (SAHRA) shall be contacted such that an archaeological/heritage resources consultant can be appointed to record the site and excavate if necessary. Work may only resume once clearance is given in writing by the archaeologist/heritage resources consultant.

g. Possible contamination of site due to hydrocarbons spillage

- All heavy vehicles, excavators and generators used for the mining will be in good working condition.
- A drip tray will be available to place underneath haul vehicles while the vehicles are parked at night.
- Should a vehicle have a break down, it will be serviced immediately. If soil contamination with diesel and oils occurred, the spill will be cleared up promptly. If the spill is small, it will be cleaned with a spill kit. If a major spill occurs where a spill kit is insufficient for clean-up, a specialised company will be used to clean the spill.
- Proper functioning of heavy vehicles will be ensured.

h. Possible establishment and spread of alien vegetation

- Every 3 months casual labour will be employed to circumnavigate the site to hand pull out known alien vegetation that may have established in the disturbed area. Special attention will be given to the perimeter topsoil berm.
- Casual labour will be provided with photographs of the alien vegetation that could establish.

i. Sanitation Facilities

- Chemical toilet facilities shall preferably be used on site. The toilets shall be serviced every second week by a service provider.

j. Safety of sloped areas

The mining area will be shaped to ensure no stockpiled heaps. The borrow pit will be free draining.

k. Unsafe working conditions for employees

- Appropriate safety clothing will be worn at all times i.e. head gear, shoes, ear plugs.

With the implementation of the mitigation measures, the risk pertaining to the implementation of this project is considered to be low.

ix) Motivation where no alternative site were considered.

No alternative site was considered for this project for the following reasons:

The following factors have an impact on the availability of suitable borrow pit areas:

- i. Highly specific rock material is required for the upgrade of the R574, which is found only at the proposed borrow pit site.
- ii. Distance from the R574 is an important factor and every km that a borrow pit is further away from the project adds between R3.5 and R5.0 million in haul cost to the project. If the haul cost becomes excessive the project will not be economically viable to implement;
- iii. Geological maps were consulted as part of a desktop study to determine suitable geological areas where road building material can be obtained;
- iv. Extensive site visits were undertaken by a geologist and specialist to identify this as a suitable material area;
- v. The land owner was engaged to obtain permission to test the area;
- vi. Discussions were undertaken with the landowner regarding land acquisition.

x) Statement motivating the alternative development location within the overall site. (Provide a statement motivating the final site layout that is proposed)

The following are reasons for the preferred development location:

- The site is not within a threatened veldtype (ecosystem).
- The site is not within any priority areas, which include protected areas (nature reserves), important bird areas (IBAs) and national protected area expansion strategy (NPAES) focus areas.
- During field investigations no Red Data Listed (RDL) were found.
- The study site is not situated within a Critical Biodiversity Area (CBA).
- There are no 'high' sensitive habitats present on site.
- No red data listed (RDL) fauna or flora species were observed in the study area boundaries.
- There are no obvious fatal flaws in terms of the natural environment.
- The borrow pit has the required aggregate material to be used for the upgrade of the R574.
- The borrow pit is in close proximity to the road upgrade project.
- Discussions were held with the relevant landowner and he does not have any objection to the proposed opening of the borrow pit on the property.
- No other site alternative was investigated as geological tests in the surrounding area shows insufficient quality of gravel material for construction purposes.

- 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.** (Including (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.)

The process of identifying possible impacts included:

- Discussions with Interested and/or Affected Parties including the landowner;
- Discussions with consulting engineers to the project;
- Specialist aquatic and ecological studies undertaken;
- Previous experience with regard to ECO work on projects.

The possible risks associated with the opening of the borrow pit are the following:

- a. Dust Pollution
- b. Soil Erosion
- c. Noise Impact
- d. Visual impact
- e. Terrestrial ecology
- f. Impact on uncovered heritage aspects
- g. Contamination of site due to hydrocarbon spillage
- h. Emissions from heavy vehicles
- i. Possible water pollution

The assessment of the significance of each is included in Table F. With the mitigation measures suggested and included in the EMP, the risk is seen as medium to low.

The EIA identified the potential positive and negative environmental (biophysical and social) impacts associated with the establishment of the mining areas. Mitigatory measures describe possible action for the mitigation of the identified potentially negative environmental impacts, and address current and future problems relating to the proposed project. The philosophy of identifying mitigation measures for negative impacts is based on the reduction of the impact during the planning and design phase and the management of the impacts during the construction and operational phases.

j) Assessment of each identified potentially significant impact and risk

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

NAME OF ACTIVITY (E.g. For prospecting – drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc 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, beams, roads, pipelines, power lines, conveyors, etc...etc... etc.)	POTENTIAL IMPACT (Including the Potential impact for cumulative impacts) (e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, air pollution etc....etc...)	ASPECTS AFFECTED	PHASE In which impact is anticipated (e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)	SIGNIFICANCE if not mitigated	MITIGATION TYPE (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 through management and monitoring through rehabilitation.	SIGNIFICANCE if mitigated
Vegetation Stripping	- Dust - Soil erosion - Noise - Visual - Terrestrial ecology - Uncovering graves - Hydrocarbon spillage - Emission from heavy vehicles	- Workers - Travelling public - Fauna and flora	Construction phase	Medium	- Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for	Low

					uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles	
Stripping and stockpiling of topsoil, subsoil, overburden and spoil	<ul style="list-style-type: none"> - Dust - Soil erosion - Noise - Visual - Terrestrial ecology - Uncovering graves - Hydrocarbon spillage - Emission from heavy vehicles - Alien vegetation infestation 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Construction phase	Medium	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles Removal of alien vegetation 	Low
Excavations	<ul style="list-style-type: none"> - Dust - Soil erosion - Noise - Visual - Uncovering graves - Hydrocarbon 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Operational Phase	Medium	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures 	Low

	spillage - Emission from heavy vehicles - Alien vegetation infestation				- Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles Removal of alien vegetation	
Blasting	a. Health and safety risk posed by blasting activities b. Dust nuisance caused by blasting activities c. Noise nuisance caused by blasting activities	- Workers - Travelling public - Fauna and flora	Operational Phase	High	<ul style="list-style-type: none"> • Blasting shall only be carried out during normal working hours. • Should noise generating activities have to occur at night (e.g. drilling of blast holes), landowners in the vicinity of the drilling should be warned about the noise well in advance and the activities should be kept to a minimum. Compliance with the appropriate legislation with respect to noise will be mandatory. • All surrounding structures shall be checked for stability and 	Medium

					<p>current condition. Appropriate measures should be taken to minimise the risk to nearby structures and to ensure that nobody is present inside any potentially unsafe structures during blasting.</p> <ul style="list-style-type: none"> • Farmers' shall be informed in time to ensure enough time to make appropriate arrangements. In particular, owners of domestic animals must be given sufficient warning so as to make proper arrangements to ensure the safety of their animals. • The blasting specification shall be adhered to pertaining to fly-rock etc. <ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on 	
--	--	--	--	--	--	--

					terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles Removal of alien vegetation	
Stockpiling and transporting of gravel material	<ul style="list-style-type: none"> - Dust - Soil erosion - Noise - Visual - Uncovering graves - Hydrocarbon spillage - Emission from heavy vehicles - Alien vegetation infestation 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Operational Phase	Medium	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles Removal of alien vegetation 	Low
Sloping and Landscaping	<ul style="list-style-type: none"> - Dust - Soil erosion 	<ul style="list-style-type: none"> - Workers - Travelling 	Decommissioning and closure	Medium	<ul style="list-style-type: none"> - Control through dust suppression 	Low

	<ul style="list-style-type: none"> - Noise - Visual - Uncovering graves - Hydrocarbon spillage - Emission from heavy vehicles - Alien vegetation infestation 	<ul style="list-style-type: none"> public - Fauna and flora 	<ul style="list-style-type: none"> phase 		<ul style="list-style-type: none"> - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles Removal of alien vegetation 	

The supporting impact assessment conducted by the EAP must be attached as an appendix marked as **Appendix**

k) Summary of specialist reports.

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

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X Where applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED.
<p>Terrestrial Ecological Assessment (Fauna and Flora) and Aquatic (Wetland) Ecological Assessment for the borrow pit sites for the upgrade and rehabilitation of the national route R574, Flori Scientific Services, 2022</p>	<p>Construction Phase / Site Establishment Phase:</p> <ul style="list-style-type: none"> • Recommended mitigating measures as proposed in this study and report should be implemented if the findings of this report are to remain pertinent. • The only bufferzones required for the project are along watercourses and only in the case of one borrow pit site (Km 36,8 - Gembokspruit 132 JS). • There are a few scattered marula trees on one borrow pit site (Km 13,2 – Tusschenin 21 S). A tree permit application process will be required to remove / destroy any of these trees, which seems likely to occur. • Mitigating measures include the following: <ul style="list-style-type: none"> o Impacts on the existing natural environment related to the project are ‘MODERATE’ within the localised area of the sites, but ‘LOW’ when taken over the entire region where the borrow pit sites are situated. o Any temporary storage, lay-down areas or accommodation facilities to be setup in existing 	<p>X (all were included)</p>	<p>Plans and EMPr</p>

	<p>disturbed areas only.</p> <ul style="list-style-type: none"> o Ensure small footprint during construction phase. o 32m Buffer zones, from the edge of the banks of all watercourses need to be implemented where necessary. o No temporary site offices or lay-down areas are allowed within 50m of the edge of any watercourses. 6. Temporary site offices or lay-down areas should be established on level ground and not along any steep hill slopes or gradients. And must be within disturbed areas as far as possible. o All hazardous materials must be stored appropriately to prevent these contaminants from entering the water environment; o All excess materials brought onto site for construction must be removed after construction. o Site-specific rehabilitation plan are crucial and non-negotiable for each borrow pit site, including access roads. These to be implemented on closure of the borrow pit site. During the active life of the borrow pit routine rehabilitation and upgrade of eroded areas, access roads, etc. must be conducted. o It is uncertain whether a General Authorisation (GA) process or Water Use Licence Application (WULA) process will be required the one borrow pit, which is within 100 m of a watercourse. This will still need to be verified. 		
Phase 1 Cultural Heritage Impact Assessment: borrow	For this proposed project, the assessment has determined that no sites, features or objects of	x	EMPr

<p>pit sites for the upgrade and rehabilitation of the national route R574, Dr J Van Schalkwyk, 2021</p>	<p>cultural heritage significance occur in the project area, therefore no permits are required from SAHRA or the PHRA.</p> <ul style="list-style-type: none"> • If heritage features are identified during construction, as stated in the management recommendation, these finds would have to be assessed by a specialist, after which a decision will be made regarding the application for relevant permits. <p>From a heritage point of view, it is recommended that the proposed development be allowed to continue on acceptance of the measures: Should archaeological sites or graves be exposed in other areas during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.</p>		

Attach copies of Specialist Reports as appendices

Copy of report attached as Appendix K.

I) Environmental impact statement

(i) Summary of the key findings of the environmental impact assessment;

The primary findings for the opening of the gravel borrow pit would probably result in:

- No negative environmental impacts of high significance with mitigation;
- Potential positive impacts due to increased economic activity, employment and training and capacity building.

The essence of the Basic Assessment process is aimed at ensuring informed decision-making and environmental accountability, and to assist in achieving environmentally sound and sustainable development.

In conclusion, it is believed the information contained in this report and the documentation attached hereto is sufficient to make a decision in respect of the activity applied for. This report covers the full suite of potential environmental issues related to the proposed development, and that sufficient information regarding the identification, assessment and potential mitigation of impacts has been presented to facilitate informed decision making by the appropriate authorities.

Based on the specialist studies undertaken within this BAR, both benefits and negative impacts are anticipated as a result of the proposed project. The findings of this BAR have highlighted these impacts and prioritised them in terms of high, medium or low significance. It is therefore recommended that this project be authorised by the authorities with the condition that the mitigation measures as stipulated in the EMPr should be adhered to. The authorities need to use this document to aid the decision-making process with respect to the future outcome of this application.

(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 area that should be avoided, including buffers. Attach as **Appendix**

Please see final site map included in Appendix C.

(iii) Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

The possible negative impacts related to the opening of the borrow pit are associated with the construction phase of the gravel material:

- a. Dust Pollution
- b. Soil Erosion
- c. Noise Impact
- d. Visual impact
- e. Impact on terrestrial ecology
- f. Impact on uncovered heritage aspects
- g. Contamination of site due to hydrocarbon spillage

- h. Emissions from heavy vehicles
- i. Water pollution

These negative impacts have a low significance and can be mitigated during the construction period.

The positive impacts associated with the opening of the borrow pit are the following:

The gravel aggregate will be used to upgrade the R574 close to the borrow pit. The upgrade of the road could ensure safer driving conditions for the travelling public by enabling vehicles to travel more efficiently and smoothly with less congestion as a result of the additional passing lanes to be constructed that will allow vehicles to safely pass slower moving trucks and vehicles. The proposed opening of the mining areas is, therefore, necessary to ensure the safety of the traveling public. This will also accommodate the predicted increase in traffic volume and avoid high driver frustration.

The opening of the borrow pit could encourage business, industry and investment and assist in alleviating the high unemployment in the region as a whole.

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.

The following impact management measures will be implemented by SANRAL to prevent or remedy any possible pollution or degradation of the environment:

a. Possible dust and air pollution

- Dust will be suppressed through a watering management programme, especially during windy conditions.
- Dust generated will be carefully monitored by the OHS&E and should be suppressed by means of water regularly.
- Access roads will be watered regularly, especially in the dry winter months and in periods of high wind.
- Vegetation will not be unnecessary stripped.
- Domestic fires will be prohibited on site.
- Heavy vehicle will be serviced regularly to ensure emission control.

b. Soil Erosion

- Topsoil, if any, will be removed over the whole mining area and stored in a perimeter berm. The height of the topsoil berm will not exceed 3m.
- The topsoil berm will be inspected for erosion daily.
- Minimal amounts of topsoil shall be lost due to erosion, either by wind or water. This can be facilitated through the grassing of topsoil stockpiles, where needed.
- Condition of soil in walk or drive areas should be checked daily for erosion.
- Access road condition will be checked daily.
- If erosion is noted at walk and drive areas, access road or topsoil berms, the erosion channel will be fixed by placing cut vegetation, sandbags or rocks within the erosion channel and the cause of the erosion will be mitigated through the creation of runoff channels.

c. Possible Noise Pollution

- The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation.
- Vehicles must be driven at a moderate speed (50 kph) on private roads.

- Noise generated from the trucks that transport the material and the excavator that is used to mine the material shall only be carried out during normal working hours.
- Extended working hours will be in accordance with contract documentation.
- SANRAL shall be obligated to maintain vehicles used at the mining area in a good condition;
- SANRAL will be obliged to ensure that all personnel on site apply occupational health and safety requirements with respect to hearing protection.

d. Possible Visual impact

- Concurrent rehabilitation of the mining area will take place.
- All unused material would be levelled to ensure that the mining area blends back into the existing landscape fabric.
- No stockpiled material is to be retained on site.
- The mining area will be shaped to ensure no stockpiled heaps and that the area blends in with the existing landscape.
- All stockpiled topsoil and vegetative material will be spread over the bottom of the mining area to ensure proper seed bed for the re-establishment of vegetative growth. Placing a berm of topsoil along the perimeter of the mining site to obscure the visual impact of the excavation.
- Re-vegetation of the mining area after mining operation has ceased.
- The access gravel road to the borrow pit will be rehabilitated and the borrow pit will be fenced following the mining of the area.

e. Aquatic and Terrestrial Ecology

Construction Phase / Site Establishment Phase:

- Recommended mitigating measures as proposed in this study and report should be implemented if the findings of this report are to remain pertinent.
- Mitigating measures include the following:
 - o Impacts on the existing natural environment related to the project are ‘MODERATE’ within the localised area of the sites, but ‘LOW’ when taken over the entire region where the borrow pit sites are situated.
 - o Any temporary storage, lay-down areas or accommodation facilities to be setup in existing disturbed areas only.
 - o Ensure small footprint during construction phase.
 - o 32m Buffer zones, from the edge of the banks of all watercourses need to be implemented where necessary.
 - o No temporary site offices or lay-down areas are allowed within 50m of the edge of any watercourses. Temporary site offices or lay-down areas should be established on level ground and not along any steep hill slopes or gradients. And must be within disturbed areas as far as possible.
 - o All hazardous materials must be stored appropriately to prevent these contaminants from entering the water environment;
 - o All excess materials brought onto site for construction must be removed after construction.
 - o Site-specific rehabilitation plan are crucial and non-negotiable for each borrow pit site, including access roads. These to be implemented on closure of the borrow pit site. During the active life of the borrow pit routine rehabilitation and upgrade of eroded areas, access roads, etc. must be conducted.
 - o It is uncertain whether a General Authorisation (GA) process or Water Use Licence Application (WULA) process will be required the one borrow pit, which is within 100 m of a watercourse. This will still need to be verified.

Operational Phase:

- No site offices, parking areas, ablution facilities, etc. may be set up outside of the demarcated study area.
- All access roads to the site must be maintained at all times. Many of these roads are gravel / sand public roads used by surrounding farmers and landowners. During the entire operational phase / life of the borrow pit these roads must be maintained and dust-suppression must be used.
- Perimeter fences to be routinely monitored and maintained. Assurances need to be in place that local livestock as well as wild animals will not be able to enter the mining site.
- An Erosion Plan to be implemented and monitored during construction phase and operational phases of the project. Even though the erosion potential is low.
- All hazardous materials must be stored appropriately to prevent these contaminants from entering the soils and natural environment.
- Under no circumstances may farm livestock as well as wild animals be interfered with.
- **Mine Closure (Rehabilitation)**
- All standard borrow pit mining operation procedures and regulations to be implemented. Rehabilitation plan for the borrow pit and general study area must be compiled prior to mine closure and assurances must be given that it will be implemented.
- The rehabilitation will have a positive impact on the site and area, although it will not be able to restore the area back to its original state.

f. Possible Impact on Uncovered Cultural or Archaeological site

- If an artefact or grave on-site is uncovered, work in the immediate vicinity shall be stopped immediately and it should immediately be reported to a heritage consultant so that an investigation and evaluation of the finds can be made. The Contractor shall take reasonable precautions to prevent any person from removing or damaging any such article.
- The South African Heritage Resources Agency (SAHRA) shall be contacted such that an archaeological/heritage resources consultant can be appointed to record the site and excavate if necessary. Work may only resume once clearance is given in writing by the archaeologist/heritage resources consultant.

g. Possible contamination of site due to hydrocarbons spillage

- All heavy vehicles, excavators and generators used for the mining will be in good working condition.
- A drip tray will be available to place underneath haul vehicles while the vehicles are parked at night.
- Should a vehicle have a break down, it will be serviced immediately. If soil contamination with diesel and oils occurred, the spill will be cleared up promptly. If the spill is small, it will be cleaned with a spill kit. If a major spill occurs where a spill kit is insufficient for clean-up, a specialised company will be used to clean the spill.
- Proper functioning of heavy vehicles will be ensured.

h. Possible establishment and spread of alien vegetation

- Every 3 months casual labour will be employed to circumnavigate the site to hand pull out known alien vegetation that may have established in the disturbed area. Special attention will be given to the perimeter topsoil berm.
- Casual labour will be provided with photographs of the alien vegetation that could establish.

i. Sanitation Facilities

- Chemical toilet facilities shall preferably be used on site. The toilets shall be serviced every second week by a service provider.

j. Safety of sloped areas

The mining area will be shaped to ensure no stockpiled heaps. The borrow pit will be free draining.

k. Emissions from heavy vehicles, excavator and generators

- All heavy vehicles, excavators and generators used for the mining will be in good working condition and will be serviced regularly.
- Should a vehicle have a break down, it will be serviced immediately.

l. Unsafe working conditions for employees

- Appropriate safety clothing will be worn at all times i.e. head gear, shoes, ear plugs.

n) Aspects for inclusion as conditions of Authorisation.

Any aspects which must be made condition of the Environmental Authorisation

- a. A Site Environmental Control Officer must be appointed for implementation of the EMPr;
- b. All mining activities must take place in accordance with the approved EMPr;
- c. Rehabilitation of mining area must be done concurrently with mining activities (whenever and wherever possible)
- d. Dump structures must not be left on the surface after the mining has ceased. This include topsoil stockpiles and gravel stockpiles.
- e. Should any archaeological artefact be exposed during mining activities, mining must be stopped. Under no circumstances shall any artefact be destroyed. The area must be fenced off and the South African Heritage Agency must be contacted as soon as possible.

o) Description of any assumption, uncertainties and gaps in knowledge.

(Which relate to the assessment and mitigation measures proposed)

- a. The following assumptions have been made for the purposes of this report:
 - All information received from sources contributing to this project is correct;
 - That SANRAL will consider the recommendations derived from this study, and
 - The Department of Mineral Resources and Energy would be the decision making authority with regard to this application.
- b. Limitations

None.
- c. Knowledge Gaps

None

p) Reasoned opinion as to whether the proposed activity should or should not be authorised

i) Reasons why the activity should be authorized or not.

The activity should be authorised by the Department of Mineral Resources and Energy as the significance of the environmental impacts identified is medium to low while there are positive impacts that will benefit the community as a whole.

ii) Conditions that must be included in the authorisation

- a. A Site Environmental Control Officer (SECO) must be appointed for implementation of the EMPr;
- b. All mining activities must take place in accordance with the approved EMPr;
- c. Rehabilitation of mining area must be done concurrently with mining activities (whenever and wherever possible)
- d. Dump structures must not be left on the surface after the mining has ceased. This include topsoil stockpiles and gravel stockpiles.
- e. Should any archaeological artefact be exposed during mining activities, mining must be stopped. Under no circumstances shall any artefact be destroyed. The area must be fenced off and the South African Heritage Agency must be contacted as soon as possible.

q) Period for which the Environmental Authorisation is required.

5 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.

By implementing the environmental management principles outlined in this report, SANRAL will ensure that the construction, operation and decommissioning of the borrow pit will not result in a material degradation of the local biophysical and social environments.

SANRAL undertakes to implement concurrent rehabilitation of the borrow pit. Areas that are due for rehabilitation during the operational phase (where practical and possible) will be rehabilitated immediately following the mining of an area.

Funds are available within the guarantee submitted by SANRAL for the project for the rehabilitation of the borrow pit.

s) Financial Provision

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

i) Explain how the aforesaid amount was derived.

The rehabilitation cost for the borrow pit was determined by means of the SARS quantum scales.

The quantum for the borrow pit is calculated at R108,234.00 for the rehabilitation of the borrow pit. Please refer to Appendix H for the quantum for the borrow pit.

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

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

SANRAL confirms that this amount is available and can be provided for the rehabilitation of the mining area in terms of the guarantee submitted.

t) Specific Information required by the competent Authority

i) 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:-

(1) Impact on the socio-economic conditions of any directly affected

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

A potential socio-economic impact is that the landowner will not be able to use the land for grazing purposes for the duration of the borrow pit activity. However, the landowner of the proposed mining area will be compensated by SANRAL for the area to be used for the excavation of the gravel material.

No other person will be affected by the mining of the area as it is not situated in close proximity to any community.

(2) Impact on any national estate referred to in section 3(2) of the

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

There is no heritage or archaeological impacts associated with the borrow pit.

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**).

None

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

1) Draft environmental management programme.

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

It is confirmed that the details of the EAP as included in Part A section 3(ii).

- 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 confirmed that a description of the aspects is included in Part A.

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)

Please see composite map included in Appendix C.

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)

After the utilisation of the borrow pit, it will be rehabilitated and closed. Rehabilitation of the borrow pit would entail infilling with natural spoils as far as possible. Proper fencing around the borrow pit and clearly visible signage indicating a dangerous area will be put into place.

1. Shaping of Borrow pit

The mining area will be shaped to ensure no stockpiled heaps. The borrow pit will be free draining.

2. Closure Measures

The following will be undertaken:

- a. Removal of mobile equipment and all scrap material;
- b. All unused material would be levelled to ensure that the borrow pit blends back into the existing landscape fabric. No stockpiled material is to be retained on site. Waste will not be permitted to be deposited in the excavations. Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings.
- c. Removal of all containers used as offices, workshops and stores. Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped. Areas containing French drains, if any, shall be compacted and covered with a final layer of topsoil to a height of 10cm above the surrounding ground surface;
- c. Clean-up of any fuel or lubricant spillage;

- e. Ensuring that all stormwater control mechanisms are in place.
- f. Ensuring alien vegetation is removed during and at the end of each contract;
- g. Ensuring that the access road is maintained and properly rehabilitated;
- h. Waste or bitumen will not be permitted to be deposited in the excavations. Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings.
- i. Vegetative growth on the slopes is usually not possible at a borrow pit.
- j. Any permanent structures and facilities including brick-built personnel amenities, soak-aways, workshop aprons and workshop floors, gas stores and any electrical supply from the grid need to be removed and the area rehabilitated.
- k. Photographs of the camp and office sites, before and during the mining operation and after rehabilitation, shall be taken at selected fixed points and kept on record.
- l. The area will be fenced.
- m. The area will be reverted back to the landowner.

ii) Volumes and rate of water use required for the operation.

It is anticipated that borehole water will be used for the operation of the borrow pit. The water will be transported from the licensed borehole from the land owner. It is not anticipated that large volumes of water will be used as water for dust suppression on the access road will be minimal, (10 000L – 20 000L/day). Potable drinking water will be sourced in town. Chemical toilets will be used which uses very little water.

iii) Has a water use licence has been applied for?

No water course will be affected by the borrow pit and no water use license is applicable to this borrow pit area.

iv) Impacts to be mitigated in their respective phases

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

ACTIVITIES	PHASE	SIZE AND SCALE of disturbance	MITIGATION MEASURES	COMPLIANCE WITH STANDERDS	TIME PERIOD FOR IMPLEMENTATION
<p>E.g. For prospecting – drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc</p> <p>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, beams, roads, pipelines, power lines, conveyors, etc...etc... etc.)</p>	<p>(of operation in which activity will take place.</p> <p>State; Planning and design, Pre-Construction, Construction, Operational, Rehabilitation, Closure, Post Closure).</p>	<p>(volumes, tonnages and hectares or m²)</p>	<p>(describe how each of the recommendations in herein will remedy the cause of pollution or degradation and migration of pollutants)</p>	<p>(A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)</p>	<p>Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.</p> <p>With regard to Rehabilitation specifically this must take place at the earliest opportunity. .With regard to Rehabilitation, therefore state either:- ..</p> <p>Upon cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.</p>
<p>Vegetation stripping</p>	<p>Construction,</p>	<p>5.4 ha</p>	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or 	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPr</p>	<p>The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.</p>

			<ul style="list-style-type: none"> artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles 		
Stripping and stockpiling of topsoil, subsoil, vegetative material and spoil	Construction	5.4 ha	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles 	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPr</p>	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.
Blasting	Operational	5.4 ha	<ul style="list-style-type: none"> - Control through dust suppression - Control through noise control measures - Control measures to lower impacts on terrestrial ecology - Control measures for hydrocarbon spillage 	Approved EMPr	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.

			- Control measures to lower emissions from heavy vehicles		
Excavations	Operational	5.4 ha	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles 	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPr</p>	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.
Stockpiling and transporting of gravel material	Operational	5.4 ha	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for 	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPr</p>	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.

			uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles		
Sloping and Landscaping	Decommissioning and closure phases	5.4 ha	- Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering of graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles	SANS noise control legislation Dust standards Safety standards Approved EMPr	Upon cessation of mining activities. Progressive rehabilitation to be implemented

e) Impact Management Outcomes

(A description of impact management outcomes, identifying the standard of impact management required for the aspects Contemplated in paragraph ());

ACTIVITY (whether listed or not listed).	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE In which impact is	MITIGATION TYPE	STANDARD TO BE ACHIEVED
--	-------------------------	-------------------------	------------------------------------	------------------------	--------------------------------

<p>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, beams, roads, pipelines, power lines, conveyors, etc...etc... etc.)</p>	<p>e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, air pollution etc....etc...)</p>		<p>anticipated (e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)</p>	<p>(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. <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring • Remedy through rehabilitation. </p>	<p>(Impact avoided, noise levels, dust levels, rehabilitation standards, end use objectives) etc.</p>
<p>Vegetation stripping</p>	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	<p>Construction</p>	<ul style="list-style-type: none"> Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	<ul style="list-style-type: none"> - No dust nuisance or complaints from landowners or public - No soil erosion and complaints from landowners - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation. - Earth berms should be placed to the side of the road to obscure the mining activities from the travelling public, if possible. - Impact to the terrestrial

					<p>ecology low. Mitigation measures as per specialist study</p> <ul style="list-style-type: none"> - No artefact or grave destroyed - Spillage contained - Low emissions - No alien vegetation at borrow pit
<p>Stripping and stockpiling of topsoil</p>	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	<p>Construction</p>	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	<ul style="list-style-type: none"> - No dust nuisance or complaints from landowners or public - No soil erosion and complaints from landowners - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation. - Earth berms should be placed to the side of the road to obscure the mining activities from the travelling public, if possible. - Impact to the terrestrial ecology low. Mitigation measures as per specialist study

					<ul style="list-style-type: none"> - No artefact or grave destroyed - Spillage contained - Low emissions - No alien vegetation at borrow pit
Excavations	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Operational	<ul style="list-style-type: none"> Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	<ul style="list-style-type: none"> - No dust nuisance or complaints from landowners or public - No soil erosion and complaints from landowners - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation. - Earth berms should be placed to the side of the road to obscure the mining activities from the travelling public, if possible. - Impact to the terrestrial ecology low. Mitigation measures as per specialist study - No artefact or grave destroyed - Spillage contained

					<ul style="list-style-type: none"> - Low emissions - No alien vegetation at borrow pit
Blasting	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Operational	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures 	<ul style="list-style-type: none"> - No dust nuisance or complaints from landowners or public - No soil erosion and complaints from landowners - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation.
Stockpiling and transporting of gravel material	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Operational	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of 	<ul style="list-style-type: none"> - No dust nuisance or complaints from landowners or public - No soil erosion and complaints from landowners - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation. - Earth berms should be

				alien vegetation	<p>placed to the side of the road to obscure the mining activities from the travelling public, if possible.</p> <ul style="list-style-type: none"> - Impact to the terrestrial ecology low. Mitigation measures as per specialist study - No artefact or grave destroyed - Spillage contained - Low emissions - No alien vegetation at borrow pit
Sloping and Landscaping	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Workers - Travelling public - Fauna and flora 	Closure and Decommissioning phase	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	<ul style="list-style-type: none"> - No dust nuisance or complaints - No soil erosion - Noise levels shall be kept to a minimum. The working hours shall be limited to between 07:00 hrs and 18:00 hrs on weekdays, and 07:00 hrs and 17:00 hrs on Saturdays, or as per contract documentation. - Earth berms should be placed to the side of the road to obscure the mining activities from the travelling public, if possible. - Impact to the terrestrial

					<p>ecology low. Mitigation measures as per specialist study</p> <ul style="list-style-type: none">- No artefact or grave destroyed- Spillage contained- Low emissions- No alien vegetation at borrow pit
--	--	--	--	--	---

f) Impact Management Actions

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

<p>ACTIVITY whether listed or not listed.</p> <p>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, beams, roads, pipelines, power lines, conveyors, etc...etc... etc.)</p>	<p>POTENTIAL IMPACT</p> <p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, air pollution etc....etc...)</p>	<p>MITIGATION TYPE</p> <p>(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.</p> <p>E.g.</p> <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring <p>Remedy through rehabilitation.</p>	<p>TIME PERIOD FOR IMPLEMENTATION</p> <p>Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.</p> <p>With regard to Rehabilitation specifically this must take place at the earliest opportunity. .With regard to Rehabilitation, therefore state either:-..</p> <p>Upon cessation of the individual activity</p> <p>or.</p> <p>Upon the cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.</p>	<p>COMPLIANCE WITH STANDARDS</p> <p>(A description of how each of the recommendations in 2.11.6 read with 2.12 and 2.15.2 herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)</p>
<p>Vegetation stripping</p>	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion 	<p>The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.</p>	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPR</p>

	<ul style="list-style-type: none"> - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 		
Stripping and stockpiling of topsoil	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPR</p>
Blasting	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion 	The measures in the Environmental Management Programme must be implemented during the	<p>SANS noise control legislation</p> <p>Dust standards</p>

		- Control through noise control measures	operational phases for the borrow pit.	Safety standards Approved EMPR
Excavations	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.	<ul style="list-style-type: none"> Tree permit SANS noise control legislation Dust standards Safety standards Approved EMPR
Stockpiling and transporting of gravel material	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts 	The measures in the Environmental Management Programme must be implemented during the construction and operational phases for the borrow pit.	<ul style="list-style-type: none"> SANS noise control legislation Dust standards Safety standards Approved EMPR

		<ul style="list-style-type: none"> - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 		
Sloping and Landscaping	<ul style="list-style-type: none"> - Dust - Soil Erosion - Noise - Visual - Terrestrial Ecology - Uncovering graves or artefacts - Hydrocarbon spillage - Emissions from heavy vehicles 	<ul style="list-style-type: none"> - Control through dust suppression - Control measures to prevent soil erosion - Control through noise control measures - Control measures to lower visual intrusion - Control measures to lower impacts on terrestrial ecology - Control measures for uncovering graves or artefacts - Control measures for hydrocarbon spillage - Control measures to lower emissions from heavy vehicles - Control measures for removal of alien vegetation 	The measures in the Environmental Management Programme must be implemented during the decommissioning and closure phases for the borrow pit.	<p>SANS noise control legislation</p> <p>Dust standards</p> <p>Safety standards</p> <p>Approved EMPR</p>

i) Financial Provision

(1) Determination of the amount of Financial Provision.

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

After the utilisation of the borrow pit, it will be rehabilitated and closed. Rehabilitation of the borrow pit would entail infilling with natural spoils as far as possible. Cutting terraces into the steep walls could prevent vertical surfaces. Proper fencing around the borrow pit and clearly visible signage indicating a dangerous area will be put into place.

1. Shaping of Borrow pit

The mining area will be shaped to ensure no stockpiled heaps. The borrow pit will be free draining.

2. Closure Measures

The following will be undertaken:

- a. Removal of mobile equipment and all scrap material;
- b. All unused material would be levelled to ensure that the borrow pit blends back into the existing landscape fabric. No stockpiled material is to be retained on site. Waste will not be permitted to be deposited in the excavations. Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings.
- c. Removal of all containers used as offices, workshops and stores. Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped. Areas containing French drains, if any, shall be compacted and covered with a final layer of topsoil to a height of 10cm above the surrounding ground surface;
- c. Clean-up of any fuel or lubricant spillage;
- e. Ensuring that all stormwater control mechanisms are in place.
- f. Ensuring alien vegetation is removed during and at the end of each contract;
- g. Ensuring that the access road is maintained and properly rehabilitated;
- h. Waste or bitumen will not be permitted to be deposited in the excavations. Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings.
- i. Vegetative growth on the slopes is usually not possible at a borrow pit.
- j. Any permanent structures and facilities including brick-built personnel amenities , soak-aways, workshop aprons and workshop floors, gas stores and any electrical supply from the grid need to be removed and the area rehabilitated.
- k. Photographs of the camp and office sites, before and during the mining operation and after rehabilitation, shall be taken at selected fixed points and kept on record.
- l. The area will be fenced.
- m. The area will be reverted back to the landowner.

(b) Confirm specifically that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.

It is confirmed that the environmental objectives pertaining to the closure have been consulted with the landowner. The land belongs to the Republic of South Africa and

Land Restitution Support at the Department of Rural Development and Land Reform was consulted in this regard.

- (c) 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.**

Please Appendix G for the rehabilitation plan and the closure report for the borrow pit.

- (d) Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.**

The rehabilitation of the borrow pit was discussed with the landowner and is therefore compatible with closure objectives of the borrow pit.

The rehabilitation plan is also compatible with the specialist report compiled by Flori Scientific Services submitted as part of this study.

- (e) Calculate and state the quantum of the financial Provision required to manage and rehabilitate the environment in accordance with the applicable guideline.**

The rehabilitation cost for the borrow pit was determined by means of the SARS quantum scales.

The quantum for the borrow pit is calculated at R108,234.00 for the rehabilitation of the borrow pit.

Please refer to Appendix H for the quantum calculated.

- (f) Confirm that the financial provision will be provided as determined.**

SANRAL confirms that this amount is available and can be provided for the rehabilitation of the borrow pit in terms of the guarantee provided.

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

- g) Monitoring of impact Management Actions
- h) Monitoring and reporting frequency
- i) Responsible persons
- j) Time period for implementing impact management actions
- k) Mechanism for monitoring compliance

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIRMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
<p>CONSTRUCTION PHASE</p> <p>1. Vegetation stripping by heavy vehicles</p> <p>2. Stripping and stockpiling of topsoil by heavy vehicles</p> <p>OPERATIONAL PHASE</p> <p>1. Excavations by heavy vehicles</p> <p>2. Stockpiling and transporting of gravel material by heavy vehicles</p>	<p>CONSTRUCTION PHASE</p> <p>Potential Impacts:</p> <p>a. Dust Pollution</p> <p>b. Soil Erosion</p> <p>c. Noise Impact</p> <p>d. Visual impact</p> <p>e. Terrestrial ecology</p> <p>f. Impact on uncovered heritage aspects</p> <p>g. Contamination of site due to hydrocarbon spillage</p> <p>h. Emissions from heavy vehicles</p> <p>2. Stripping and stockpiling of topsoil</p> <p>Potential Impacts:</p>	<p>See Appendix J</p>	<p>See Appendix J</p>	<p>See Appendix J</p>

<p>DECOMMISSIONING PHASE</p> <p>1. Sloping and Landscaping during rehabilitation</p> <p>2. Replacing the topsoil and revegetating the disturbed area</p>	<p>a. Clearing of vegetation b. Visual intrusion as a result of establishment of the borrow pit. c. Dust nuisance caused by machinery stripping topsoil d. Noise nuisance caused by machinery stripping topsoil e. Infestation of weeds and alien vegetation on topsoil heaps f. Loss of topsoil due to incorrect storm water management g. Contamination of site due to hydrocarbons h. Impact on uncovered heritage aspects i. Emissions from heavy vehicles</p> <p>OPERATIONAL PHASE</p> <p>Potential Impacts: a. Visual intrusion associated with the excavation activities b. Dust nuisance caused by excavation activities c. Noise nuisance generated by excavation equipment d. Contamination of surface or groundwater due to effluent runoff from</p>			
---	--	--	--	--

	<p>excavation</p> <p>e. Unsafe working conditions for employees</p> <p>f. Potential damage to uncovered cultural and heritage aspects</p> <p>g. Contamination of site due to hydrocarbons</p> <p>h. Emissions from heavy vehicles</p> <p>2. Stockpiling and Transporting of gravel material</p> <p>Potential Impacts:</p> <p>a. Visual intrusion associated with the stockpiled material and heavy vehicles transporting the gravel material</p> <p>b. Loss of material due to ineffective storm water handling</p> <p>c. Dust nuisance from stockpiled material and heavy vehicles transporting material</p> <p>d. Degradation of access roads</p> <p>e. Noise nuisance caused by heavy vehicles</p> <p>f. Contamination of site due to hydrocarbons</p>			
--	---	--	--	--

	<p>g. Emissions from heavy vehicles</p> <p>DECOMMISSIONING PHASE</p> <p>Potential Impacts</p> <ul style="list-style-type: none"> a. Soil erosion b. Health and safety risk posed by unsloped areas c. Dust nuisance caused during sloping and landscaping activities d. Noise nuisance caused during sloping and landscaping activities e. Contamination of site due to hydrocarbons f. Emissions from heavy vehicles <p>2. Replacing the topsoil and revegetating the disturbed area.</p> <p>Potential Impacts:</p> <ul style="list-style-type: none"> a. Loss of reinstated topsoil due to absence of vegetation b. Infestation of the area with weed and invader plants <p>ALL phases: Proper functioning of sanitation</p>			
--	---	--	--	--

	systems			

l) Indicate the frequency of the submission of the performance assessment /Environmental audit report.

A performance assessment/environmental audit report shall be submitted to the Department yearly. A final audit report will be submitted to the Department following the final rehabilitation of the borrow pit.

m) 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.

SANRAL shall ensure that its employees are adequately trained with regard to the implementation of the EMP, as well as regarding environmental legal requirements and obligations.

a. Induction Training:

All employees and visitors on site will have an **Induction** training on environmental awareness. Where possible, the presentation needs to be conducted in the language of the employees.

The environmental training should, as a minimum, include the following:

- Information on Environmental Risks

Employees will be adequately trained with regard to the following potential environmental risks:

- The risk of non-conformance with all environmental policies, procedures, plans and systems.
- The risk of not strictly implementing the approved EMP.
- The potential consequences of departure from specified operating procedures.
- The significant environmental impacts, actual or potential, as a result of their work activities.

- General awareness training and training on dealing with emergency situations:

Employees will be given general awareness training and training on dealing with emergency situations by means of the following:

- Understanding, and importance of, and the reasons why, the environment must be protected.
- Basic awareness and understanding of the key environmental features of the work site and environments.
- The mitigation measures required to be implemented when carrying out their work activities.
- The environmental benefits of improved personal performance.
- Their roles and responsibilities in achieving conformance with the environmental policy and procedures, including emergency preparedness and response requirements.
- What to do in the case of a hydrocarbon spill.
- Who to contact in the case of an emergency.

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

Employees will be adequately trained with regard to dealing with environmental risks by means of the following:

- Details regarding archaeological and/or historical sites that may be unearthed during construction, and the procedures to be followed should these be encountered.
- The procedures which should be followed should a grave be encountered or unearthed during the construction phase.
- Details of and encouragement to minimise the production of waste and re-use, recover and recycle waste where possible.
- Ways to minimise the environmental impacts.
- How to identify erosion and how to fix it.
- The importance of not littering.
- Prevention and handling of fire
- The need to use water sparingly.
- The importance of dust management.
- How to identify alien vegetation and the best practice for removing it.
- Requirements of the EMPr.

n) Specific information required by the Competent Authority
 (Among others, confirm that financial provision will be reviewed annually)

By implementing the environmental management principles outlined in this report, SANRAL will ensure that the construction, operation and decommissioning of the borrow pit will not result in a material degradation of the local biophysical and social environments.

SANRAL undertakes to implement concurrent rehabilitation of the borrow pit. Areas that are due for rehabilitation during the operational phase (where practical and possible) will be rehabilitated immediately following the mining of an area.

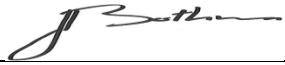
Funds are available within the financial guarantee that was submitted by SANRAL.

The financial provision will be reviewed annually.

2) UNDERTAKING

The EAP herewith confirms

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



Signature of the environmental assessment practitioner:

Chameleon Environmental

Name of company:

2022-03-05

Date:

-END-