

# **National Treasure Minerals (Pty) Limited**

## **Witkranz Prospecting Project**

**DRAFT**

**Basic Assessment Report (BAR) and Environmental Management Programme (EMPr)**

**Compiled in terms of Appendix 1 and Appendix 4 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 326) (EIA Regulations, 2014) and submitted as contemplated in Regulation 19 of Chapter 4 of the EIA Regulations, 2014**

**For**

**The application for an Environmental Authorization in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Amended Environmental Impact Assessment Regulations 2014, Government Notice R983 - Listing Notice 1 of 2014**

**DMRE Reference No.: MP 30/5/1/1/2/16913 PR**

**FEBRUARY 2022**

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Report Type: Draft BAR/EMPr  
Project Title: Witkranz Prospecting Project  
Compiled for: National Treasure Minerals (Pty) Limited  
Compiled by: P. Sekgukulu, BSc. Hons. Cand.Sci.Nat  
Reviewed by: T. Shakwane, B.Sc. Hons. Pr.Sci.Nat and Registered EAP  
Version: Draft  
Date: February 2022

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The results and conclusions of this report are limited to the Scope of Work agreed between Geovicon Environmental (Pty) Limited and National Treasure Minerals (Pty) Limited for whom this report/ investigation has been conducted. All assumptions made and all information contained within this report and its attachments depend on the accessibility to and reliability of relevant information, including maps, previous reports and laboratory results, from the Client and Contractors. All work conducted by Geovicon Environmental (Pty) Limited is done in accordance with the Geovicon Standard Operating Procedures.

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3. I have not received, nor have I been offered, any significant form of inappropriate reward for compiling this report.

---

(Electronic signature)

P. Sekgukulu, BSc. Hons. Cand.Sci.Nat

This report was reviewed by:

---

(Electronic signature)

T. Shakwane, B.Sc. Hons. (Professional Natural Scientist no: 117080)

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## EXECUTIVE SUMMARY

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National Treasure Minerals (Pty) Limited has lodged an application for a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2004 (Act 28 of 2004). National Treasure Minerals (Pty) Limited proposes to prospect for coal and pseudocoal on a portion of portion 1 of the farm Witkranz 53 IT, situated within Carolina Magisterial District.

Witkranz prospecting project will be undertaken in different phases i.e., literature review (available data interpretation and deciding whether to commence with drilling), field mapping and geophysical survey, positioning of drilling sites, diamond core drilling, logging/sampling of borehole cores and rehabilitation of the drilling site.

The commencement of the proposed Witkranz prospecting project will result in the undertaking of activities that are considered as listed activities in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) as amended (NEMA). In terms of the above-mentioned legislation, an application for an environmental authorisation must be submitted to the competent authority which application must be granted before the commencement of the proposed listed activities. In addition to the above, an environmental impact assessment must be undertaken in support of the environmental authorisation application for the proposed listed activities. In view of the above, National Treasure Minerals (Pty) Limited appointed Geovicon Environmental (Pty) Limited, an independent environmental consulting company, to undertake and manage the environmental authorisation application and the environmental impact assessment for the proposed Witkranz prospecting project. An application for an environmental authorisation for the proposed Witkranz prospecting project was submitted to the Department of Mineral Resources and Energy (DMRE), Mpumalanga Regional Office (Competent Authority) for their consideration. The application has ever since been received by the Department and a Basic Assessment Report (BAR) together with an EMPr must be compiled and submitted in terms of the requirements of the EIA Regulations, 2014.

This document (BAR and EMPr), which concerns assessment of environmental impacts and a programme for management of the impacts for the proposed activities at the Witkranz prospecting area, was compiled in terms of the amended EIA Regulations, 2014 for review by interested and affected parties including the competent authority.

Environmental baseline data used in this report has been obtained through desktop assessments for surface water, geohydrological data, topographical analyses, soil surveys, vegetation surveys, wetland surveys and geological conditions and the socio-economic aspects. Weather data was acquired from the South African Weather Service. Historic land use was determined through available data. The data accumulated and analysed is; therefore, deemed sufficient to gain a baseline indication of the present state of the environment. The use of this baseline data for impact assessments is thus justified, and reliable conclusions could be made. The impacts that could arise during and after the proposed activities at the Witkranz prospecting area were determined and ranked according to their significance. Based on the impact assessment, recommendations were made for the mitigation of significant negative environmental impacts that will result from the proposed area.

**PART A**

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BASIC ASSESSMENT REPORT

## **SECTION ONE**

---

### **INTRODUCTION**

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## 1. INTRODUCTION

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### 1.1. WHO IS DEVELOPING THE BAR AND EMPR?

#### 1.1.1. Name and contact details of the EAP who prepared the BAR and EMPR

**EAP:** Mr. Ornassis Tshepo Shakwane

**Professional registration:**

**SACNASP:** 117080

**EAPASA:** 2019/1763

**IAIA Membership No.:** 3847

**Company:** Geovicon Environmental (Pty) Limited

**Postal Address:**

P.O. Box 4050

MIDDELBURG, 1050

**Tel:** (013) 243 5842

**Fax:** (086) 632 4936

**Cell No.:** 082 498 1847

**Email:** tshepo@geovicon.co.za

#### 1.1.2. Expertise of the EAP who prepared the BAR and EMPR

Geovicon Environmental (Pty) Limited is a geological and environmental consulting company. The company was formed during 1996, and currently has more than 20 years' experience in the geological and environmental consulting field. Geovicon Environmental (Pty) Limited has successfully completed consulting work in the Mining sector (coal, gold, base metal and diamond), Quarrying sector (sand, aggregate and dimension stone), Industrial sector and housing sector. Geovicon Environmental (Pty) Limited has undertaken contracts within all the provinces of South Africa, Swaziland, Botswana and Zambia. During 2001 Geovicon Environmental (Pty) Limited entered the field of mine environmental management and water monitoring.

Geovicon Environmental (Pty) Limited is a Black Economically Empowered Company with the BEE component owning 60% of the company. Geovicon Environmental (Pty) Limited has three directors i.e., O.T Shakwane, J.M. Bate and T.G Tefu.

Mr. O.T Shakwane obtained his BSc (Microbiology and Biochemistry) from the University of Durban Westville in 1994, and completed his honours degree in Microbiology in 1995. Mr O.T Shakwane has also completed short courses on environmental law and environmental impact assessment with the University of Mpumalanga's Centre for Environmental Management. He has worked with the three state departments tasked with mining and environmental management i.e., Department of Water and Sanitation (Gauteng and Mpumalanga Region), Department of Mineral Resources and Energy (Mpumalanga Region) and Department of Agriculture, Conservation and Environment (Gauteng Region). Mr. Shakwane has been in the consulting field since 2004 and has completed various areas similar to the proposed Witkranz prospecting project as an environmental assessment practitioner. Mr

Shakwane is the environmental assessment practitioner for the environmental impact assessment for the proposed Witkranz prospecting project.

Over the past years Geovicon Environmental (Pty) Limited has formalised working relationships with companies that offer expertise in the following fields i.e., Geohydrology, Civil and Geotechnical Engineering, Geotechnical Consultancy, Survey and Mine Planning and Soil & Land Use Consultancy. Geovicon Environmental (Pty) Limited is an independent consulting company, which has no interest in the outcome of the decision regarding the Witkranz prospecting project basic assessment process.

## **1.2. WHO WILL EVALUATE AND APPROVE THE BAR AND EMPR?**

Before the proposed project can proceed, an Environmental Assessment Practitioner (EAP) must compile an application for an environmental authorisation for the proposed project. An impact assessment (basic assessment process) must be undertaken in support of the application for an environmental authorisation. The basic assessment process will determine the potential environmental impacts that may result from the proposed project and an environmental management programme will be compiled to provide measures for mitigation against the identified impacts. The above-mentioned application must be made to the competent authority and in terms of section 24D (1) of NEMA, the Minister responsible for mineral resources is the responsible competent authority for this application. In view of the above, the application for the environmental authorisation for the proposed project was submitted to the Department of Mineral Resources and Energy (DMRE), Mpumalanga Regional Office for their consideration and decision making.

In the spirit of co-operative governance and in compliance with the requirements of NEMA and the MPRDA, the competent authority may, during the processing for the environmental authorisation application, consult with other organs of state that administers laws that relate to matters affecting the environment relevant to this application. Note that during the public participation process for the proposed project, the EAP will also consult with the below listed state authorities.

The organs of state that are to be consulted may include the following:

- Department of Mineral Resources and Energy, Mpumalanga Regional Office (Competent Authority).
- National Department of Agriculture, Forestry and Fisheries, Mpumalanga Regional Office (Commenting Authority).
- South African Heritage Resources Agency (Commenting Authority).
- Department of Agriculture, Forestry and Fisheries (NDAFF).

Note however that this list is not exhaustive as more organs of state may be identified by the competent authority and EAP during the public participation process.



### **1.3. DETAILS OF THE APPLICANT**

#### **1.3.1. Name of the Applicant**

National Treasure Minerals (Pty) Limited.

#### **1.3.2. Name of the Project**

Witkranz prospecting project.

#### **1.3.3. Postal Address of Applicant**

National Treasure Minerals (Pty) Limited

P.O. Box 213

Waterkloof

Pretoria

0181

#### **1.3.4. Responsible Person**

Mongwe Mojalefa

#### **1.3.5. Contact Person**

Mongwe Mojalefa

Cell No: 074 548 9726

Fax: (086) 575 1718

E-mail: douglas@xakwa.com

### **1.4. DESCRIPTION OF THE PROPERTY (LOCATION OF THE PROJECT)**

#### **1.4.1. Regional Setting**

The Witkranz prospecting project is situated within the Carolina Magisterial District approximately 15 km north-east of Carolina and approximately 17 km south-west of Breyten, access to the area is via the R 36 Provincial Road or unnamed farm road that passes right next to the prospecting area. See Figure 1, for the location of Witkranz prospecting area and Table 1 for the distance and directions of towns around the Witkranz prospecting area.

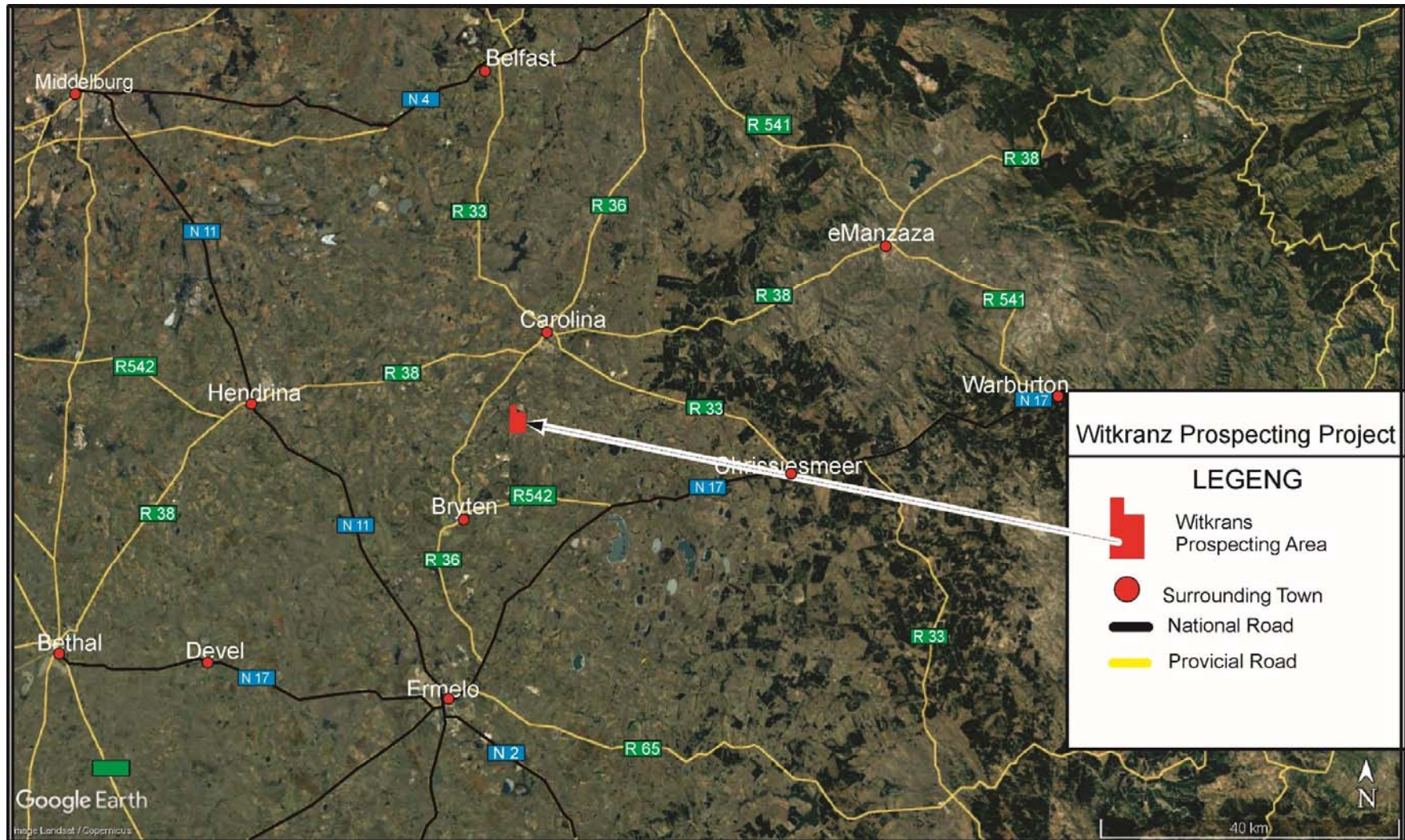


Figure 1:Regional setting

#### 1.4.2. Physical Address and Farm Name of the prospecting Area

Witkranz prospecting project is situated on a portion of portion 1 of the farm Witkranz 53 IT, Mpumalanga province.

#### 1.4.3. Magisterial District & Regional Services Council

- Magisterial District: Carolina Magisterial District, Mpumalanga
- District Municipality: Gert Sibande District Municipality
- Local Municipality: Chief Albert Luthuli Local Municipality

#### 1.4.4. Direction and Distance to Nearest Towns

**Table 1: Direction and Distance to Nearest Towns.**

<b>TOWN (Surrounding nearest towns from the proposed area)</b>	<b>DIRECTION</b>	<b>Distance (KM) from the proposed area</b>
Carolina	NE	15 km
Breyten	SW	17 km
Chrissiesmeer	SE	20 km

#### 1.4.5. Locality Plan

Refer to Figure 2 for the locality plan of the Witkranz prospecting area.





Figure 2: Locality Plan.

#### 1.4.6. Land Tenure and Use of Immediate and Adjacent Land

Land tenure for the properties within and immediately around the proposed Witkranz prospecting area is indicated on Figure 3 and described in Table 2.

**Table 2: Schedule of properties listing surface ownership within and surrounding Witkranz prospecting area.**

FARM NAME AND NUMBER	21 DIGIT SURVEYOR GENERAL CODE	DESCRIPTION OF SUB-DIVISION	SURFACE OWNER
Witkranz 53 IT	T0IT0000000005300001	Portion of portion 01*	Northern Coal Pty Ltd
	T0IT0000000005300001	Portion 01	Northern Coal Pty Ltd
	T0IT0000000005300015	Portion 15	Baaditjesbult Boerdery - Pty Ltd
	T0IT0000000005300016	Portion 16	Nel Stephanus Jacobus
Roodebloem 51 IT	T0IT0000000005100002	Portion 02	Ndzimandze Bob Fuga
	T0IT0000000005100003	Portion 03	Mbokane Simon Musa
WITRAND 52 IT	T0IT0000000005200001	Portion 01	Willie Engelbrecht - Landgoed Pty Ltd

\*Portion on which the prospecting area is applied for, also refer to **Appendix A** regulation 2(2) plan and **Appendix B** Deed's list of direct farm owners.

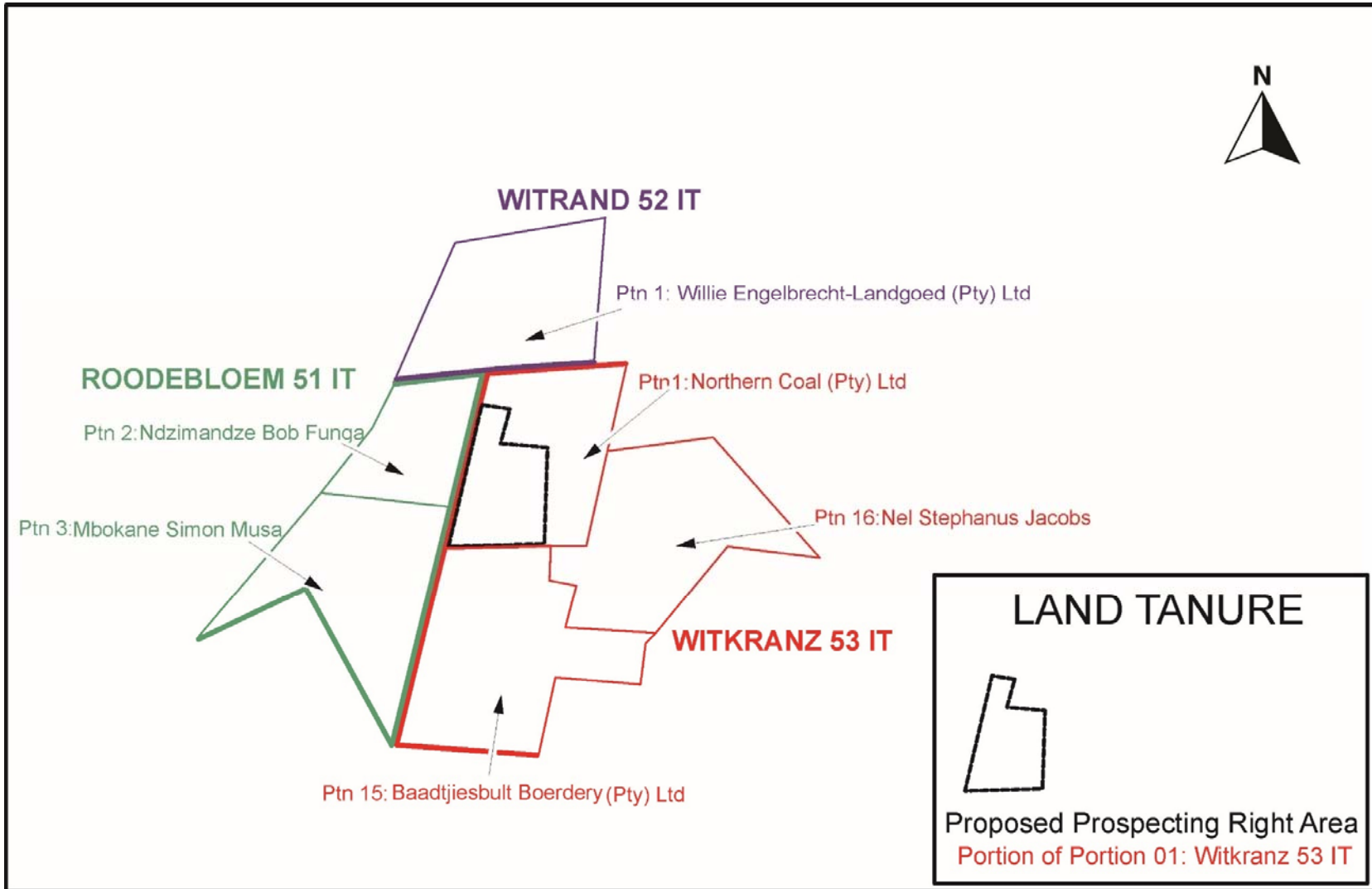


Figure 3: Land Tenure Plan for the Witkranz prospecting area.

## **SECTION TWO**

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### **DESCRIPTION OF THE SCOPE OF THE PROPOSED PROJECT**

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## **2. DESCRIPTION OF THE SCOPE OF THE PROPOSED PROJECT**

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### **2.1. LISTED ACTIVITIES AND SPECIFIED ACTIVITIES**

In terms of the NEMA, the proposed Witkranz prospecting project will result in activities that are considered as listed activities. In terms of the above-mentioned legislation, none of the above-mentioned listed activities can be conducted without an environmental authorisation. In view of the above, National Treasure Minerals (Pty) Limited has submitted an application for an environmental authorisation for all listed activities to be conducted at the proposed Witkranz prospecting area to the competent authority (DMRE). This section will give a description of the listed activities that will be included in the application for an environmental authorisation. Table 3 is compiled as prescribed by the DMRE, EIR and EMPr template and reflects all project activities applied for.

### **2.2. DESCRIPTION OF THE PROPOSED PROJECT**

National Treasure Minerals (Pty) Limited proposes to prospect for coal and psuedocoal on the Witkranz prospecting area. This will include the usage of diamond core drilling methods.



**Table 3: Proposed Witkranz prospecting area Listed Activities.**

LISTED ACTIVITY	NAME OF ACTIVITY	AERIAL EXTENT OF THE ACTIVITY	APPLICABLE LISTING NOTICE
<b>PROPOSED WITKRANZ PROSPECTING AREA LISTED AND SPECIFIC ACTIVITIES</b>			
<b>NATIONAL ENVIRONMENTAL MANAGEMENT ACT</b>			
<p><b><u>Activity 20 of Listing Notice 1:</u></b>                      Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource, including activities for which an exemption has been issued in terms of section 106 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).</p>	<p>Conducting prospecting activities within the Witkranz prospecting area for the exploration of minerals applied for using a diamond core drilling prospecting method together with all associated infrastructure and activities. These include site establishment (access to site and a campsite), pegging of drilling sites, drilling of exploration boreholes with associated sumps, logging and sampling of drilled cores and site rehabilitation.</p>	<p>0.08 hectares.</p>	<p>NO. 983</p>

### **2.2.1. Target Minerals**

Coal and pseudocoal.

### **2.2.2. Prospecting method to be used at the Witkranz prospecting area.**

The proposed Witkranz prospecting area will be explored in three phases i.e., literature review/field mapping phase and two drilling phases. Only the field mapping and drilling phases have potential for environmental impacts, thus only these two last phases will be described in this section of the report.

The field mapping phase will include the establishment of access to the site (tracks and/or existing roads), establishment of a campsite (a caravan and chemical toilet), field surveying (to determine sensitive areas), geophysical surveys (if necessary) and pegging of the drilling sites.

Drilling phase will involve the drilling of the sited drilling boreholes by drill rig, using a diamond core drilling technique. A sump will be constructed in each drilling borehole for the collection and recycling of water from the drilling operation. The sump will be constructed to be one square meter in size and have a maximum depth of 1 meter. Any soils removed from the sump (approximately one cubic meters) will be placed adjacent to the drilling site and used for rehabilitation of the site.

Boreholes will be drilled at pre-planned sites. The boreholes will be drilled to intersect all the expected reserves and will be logged by a geologist. The samples will be sent to a laboratory for quality determination. This data will form the basis for the geological modelling and financial evaluation.

National Treasure Minerals (Pty) Limited proposes to drill 10 boreholes in total throughout the life of the prospecting project.

### **2.2.3. Planned Life of Project**

The current estimated life of the proposed Witkranz prospecting project is five (5) years.

## **2.3. WITKRANZ PROSPECTING AREA SURFACE INFRASTRUCTURE DESCRIPTION**

### **2.3.1. Access**

There is a good network of both tarred and gravel roads connecting the prospecting area with surrounding towns. Existing roads to be used for the proposed area include the R36 Provincial Road, a secondary road and a number of private farm roads. Where no roads exist, tracks will be used to access the drilling sites. No clearing of natural vegetation will be undertaken.

### **2.3.2. Machinery and Vehicle Power**

Diesel powered vehicles and machinery will be used for the proposed project.

### **2.3.3. Water Supply Infrastructure**

Water for the operation of machines and for domestic use will be required within the drilling sites and campsites, respectively. Therefore, water will be obtained from the landowner's borehole or any farm dam that might exist on the property and will be trucked with a water cart to all drill sites.

### **2.3.4. Workshops and Buildings**

No workshops and office buildings will be required for this project. All machinery will be maintained at an offsite workshop. Should emergency repairs be required the repairs will be conducted on site on areas on surface covered with tarpaulins to avoid any spillages on soil.

### **2.3.5. Waste Management**

#### 2.3.5.1. Waste Identification and Management

##### Hazardous Waste

Hazardous waste to be generated includes hydrocarbon wastes (oil and liquid fuel wastes) and sewage waste. Oil waste and liquid fuels waste include used oils from machinery and vehicles and diesel/petrol waste.

##### General Waste

General waste to be generated from the proposed area is domestic waste. Domestic waste will include papers, containers, food waste, stationary and discarded PPE generated from the drilling and campsites.

#### 2.3.5.2. Waste Management Facilities

##### Hazardous Waste

Hydrocarbon waste will be collected in 210 litre drums for storage. The removal of the drums or any other appropriate receptacle will be undertaken by a waste disposal company, for disposal at a registered licensed waste disposal site. The drums will be placed on protected ground.

Chemical toilets will be used for the management of sewage waste generated on site.

##### General Waste

General waste will be collected in wheeled bins or refuse bags. The removal of this waste will be undertaken by the municipality or disposed at a registered landfill site.

### **2.4. WITKRANZ PROSPECTING PROJECT- METHOD STATEMENT**

In terms of the DMRE BAR and EMPr template, National Treasure Minerals (Pty) Limited must describe the methods and technology to be employed for the proposed project. In view of the above, a method statement for each phase of the proposed project has been provided. This identifies all actions, activities or processes associated with the proposed prospecting operation.

#### **2.4.1. Pre-Construction Phase**

##### 2.4.1.1. Data gathering

Relevant information regarding the potential of the identified prospecting area will be sourced from institutions like the Council for Geoscience. This information will be analysed and interpreted through computer modelling of existing data.

The interpretation of the said data will result in compilation of a literature review report. The said report will give indication as to what processes (in order of priority) to follow to complete the prospecting activities.

##### 2.4.1.2. Field Mapping

The field mapping will include field surveying (to determine sensitive areas), geophysical surveys and pegging of the drilling sites.

#### 2.4.1.3. Detailed site survey and investigation

Demarcation of sensitive and protected areas will be conducted by physical survey of the proposed area by a suitability qualified person. This should be done before establishment of access to the site, campsites and drilling of exploration boreholes.

#### 2.4.1.4. Geophysical surveys and data interpretation

A Handheld proton Magnetometer will be used to perform the magnetic survey over the proposed prospecting site. Please refer to Figure 4.



**Figure 4: GSM-19T Proton Precession system in action.**

#### 2.4.1.5 Pegging of drill sites

All exploration borehole sites will be staked by a suitably qualified person. The sites will; thereafter be plotted on a plan drawn to an appropriate scale.

#### 2.4.1.6 Decision to commence with prospecting activities

Once all factors are gathered, a physical inspection of the terrain will be conducted to verify certain aspects, such as, type of the terrain involved, type of methods to be used, etc. The important point to note is that a decision on whether or not to proceed with prospecting depends not only on the scientific and reliability of the methods under consideration, but also upon many fewer tangible factors, such as restrictions that might be imposed by the relevant Department when granting a prospecting right.

### **2.4.2. Construction Phase**

Construction phase will involve the establishment of access to the drilling sites (tracks and/or existing roads) and establishment of campsite (a caravan/tents and chemical toilet).

#### 2.4.2.1. Establishment of access

The R36 route runs east of the proposed area. A secondary road and a number of private farm roads and tracks lie in close proximity to the proposed prospecting area, hence access to the site will be through these roads. Where necessity arise for access to the drilling sites, tracks will be established and used as access to the drilling sites. These, tracks will be established to be more than hundred meters away from any sensitive landscapes. The tracks will also be sited away from protected areas. Vegetation clearance will be avoided during the establishment of the access tracks.

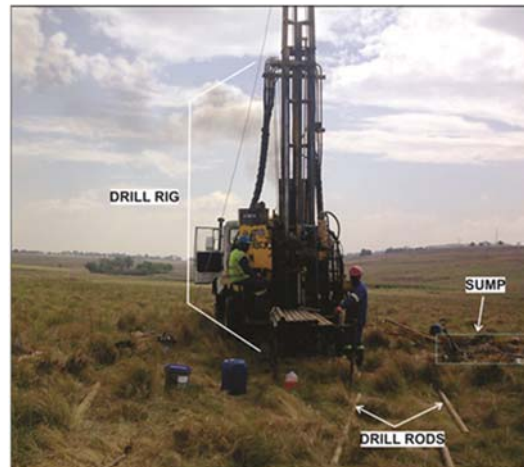
#### 2.4.2.2. Establishment of campsite

Tents and/or caravans, ablution facilities (chemical toilets) and waste storage facilities will be provided for employees. Clearing of vegetation will be avoided during the establishment of the campsite.

### 2.4.3. Operational Phase

#### 2.4.3.1. Diamond core drilling and sump construction

Geological boreholes will be drilled on a predetermined grid. During drilling of each borehole, a sump of approximately 1.0 x 1.0 x 1.0 m will be excavated for collecting excess muds (water) from the drilling operation and the water will be used for the operation of the drilling machine. Refer to Figure 5 where the drill rig is represented.



**Figure 5: Drill rig operation**

#### 2.4.3.2. Topsoil storage site

The top and sub soils removed from the sump and drilling boreholes will be stockpiled in close proximity to the sump. The sumps will be backfilled manually by spade, once drilling and sampling of boreholes is completed.

#### 2.4.3.3. Logging and sampling of the Core

This involves the physical description of the rocks intersected by the drilling process. The interpretation of these rock descriptions will assist in establishing the general stratigraphy of the area. Sampling will be taken at the desired horizons and sent to the laboratory for analyses.

#### 2.4.3.4. Site Rehabilitation

Concurrent rehabilitation (Plugging and reseeded) of disturbed areas will be undertaken as drilling continues.

Please note that the final borehole layout can only be determined once the Prospecting Right is granted; thereafter, it will be sent in to the Department of Mineral Resources and Energy (DMRE).

### 2.4.4. Decommissioning phase

#### 2.4.4.1. Final Rehabilitation

Except for farm roads, no tracks and infrastructure related to the prospecting operation will remain in place after the decommissioning phase. Where tracks have resulted in more damage, such tracks will be ripped and allowed to return to the natural state, and seeding is not done as experience has shown

that the natural process returns the site to its former state within a seasonal cycle. The sumps will be rehabilitated in such a manner to return the area to as close as possible to its pre-drilling environment. Post closure, the prospecting area will consist of re-vegetated areas with vegetation cover comparable to the surrounding areas. No prospecting related infrastructure will remain on the prospecting site. The area will conform to the pre-prospecting topography. The areas affected by prospecting will be stable and erosion free.

#### **2.4.5. Pre-feasibility study**

This involves the compilation of a final geological report, reserve determination and pre-feasibility studies.

#### **2.4.6. Mining feasibility study**

This involves the conducting of a mining feasibility study, market research, sales agreements etc.

#### **2.4.7. After Closure Phase**

The rehabilitated area will be monitored on a quarterly basis to ensure that the site returns to an acceptable state, in the event that is not happening naturally, the area will be seeded. After the decommissioning of the site and if it can be determined that the site is stable, an environmental authorisation for the decommissioning of the site and a closure certificate will be applied for in terms of the relevant laws.

## **SECTION THREE**

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### **POLICY AND LEGISLATIVE CONTEXT**

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### **3. POLICY AND LEGISLATIVE CONTEXT**

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#### **3.1. CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA (ACT NO. 108 OF 1996)**

Section 24 of the Constitution of the Republic of South Africa (Act No.108 of 1996) states that everyone has the right:

- a) to an environment that is not harmful to their health or well-being; and
- b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that;
  - (i) prevent pollution and ecological degradation;
  - (ii) promote conservation; and
  - (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

In terms of Section 24 of the Constitution of the Republic of South Africa (Act No.108 of 1996), everyone has the right to an environment that is not harmful to their health or well-being. In addition, people have the right to have the environment protected, for the benefit of present and future generations, through applicable legislations and other measures that prevent pollution, ecological degradation and promote conservation and secure ecological sustainable development through the use of natural resources while prompting justifiable economic and social development. The needs of the environment, as well as affected parties, should thus be integrated into the overall project in order to fulfil the requirements of Section 24 of the Constitution. In view of the above, a number of laws pertaining to environmental management were promulgated to give guidance on how the principles set out in section 24 of the Constitution of the Republic of South Africa (Act No.108 of 1996) would be met. Below are laws applicable to the proposed project that were promulgated to ensure that section 24 of the Constitution of the Republic of South Africa (Act No.108 of 1996) is complied with.

#### **3.2. NATIONAL ENVIRONMENTAL MANAGEMENT ACT**

Section 24(1) of the NEMA states:

“In order to give effect to the general objectives of integrated environmental management laid down in this Chapter [Chapter 5], the potential consequences for or impacts on the environment of listed activities or specified activities must be considered, investigated, assessed and reported on to the competent authority or the Minister of the Department of Mineral Resources and Energy, as the case may be, except in respect of those activities that may commence without having to obtain an environmental authorisation in terms of this Act.”

In order to regulate the procedure and criteria as contemplated in Chapter 5 of NEMA relating to the preparation, evaluation, submission, processing and consideration of, and decision on, applications for environmental authorisations for the commencement of activities, subjected to environmental impact assessment, in order to avoid or mitigate detrimental impacts on the environment, and to optimise positive environmental impacts, and for matters pertaining thereto, Regulations (EIA Regulations, 2014) were promulgated. These Regulations took effect from the 4<sup>th</sup> of December 2014.

In addition to the above, Section 28 of the NEMA includes a general “Duty of Care” whereby care must be taken to prevent, control and remedy the effect of significant pollution and environmental degradation. This section stipulates the importance to protect the environment from degradation and



pollution irrespective of the operations taking places or activities triggered / not triggered under No. 982, No. 984 and No. 985.

In view of the above, an environmental impact assessment is being undertaken to comply with the requirements of the NEMA and the NEMA EIA Regulations, 2014. The NEMA EIA Regulations of December 2014 determines requirements to be met in order to obtain an environmental authorisation. This report has; therefore, been compiled in compliance with the above regulations.

### **3.3. NATIONAL ENVIRONMENTAL MANAGEMENT AIR QUALITY ACT**

The National Environmental Management: Air Quality Act (Act No.39 of 2004) (NEM: AQA) focuses on reforming the law regulating air quality in South Africa in order to protect the environment through the provision of reasonable measures protecting the environment against air pollution and ecological degradation and securing ecological sustainable development while promoting justifiable economic and social developments. This Act provides national norms and standards regulating air quality management and control by all spheres of government. These include the National Ambient Air Quality Standards (NAAQS) and the National Dust Control Regulations (NDCR). The standards are defined for different air pollutants with different limits based on the toxicity of the pollutants to the environment and humans, number of allowable exceedances and the date of compliance of the specific standard.

On 22 November 2013 the list of activities which result in atmospheric emissions which have or may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage was published under GN R893 in Governmental Gazette No 37054, in terms of Section 21(1)(b) of the NEM: AQA.

The proposed project will not trigger any of the activities listed under the above-mentioned Regulations; however, National Treasure Minerals (Pty) Limited must ensure that emissions from their activities complies with the standards as set in the above-mentioned regulations.

### **3.4. THE NATIONAL HERITAGE RESOURCES ACT**

The National Heritage Resources Act (Act No. 25 of 1999) (NHRA) focuses on the protection and management of South Africa's heritage resources. The governing authority for this act is the South African Heritage Resources Agency (SAHRA). In terms of the NHRA, historically important features such as graves, trees, archaeology and fossil beds are protected as well as culturally significant symbols, spaces and landscapes. Section 38 of the NHRA stipulates the requirements a developer must undertake prior to development. In terms of Section 38 of the NHRA, SAHRA can call for a Heritage Impact Assessment (HIA) where certain categories of development are proposed.

A Heritage Impact Assessment (HIA) is the process to be followed in order to determine whether any heritage resources are located within the area to be developed as well as the possible impact of the proposed development thereon.

The Act also makes provision for the assessment of heritage impacts as part of an EIA process and indicates that if such an assessment is deemed adequate, a separate HIA is not required. An assessment of the proposed area will be done during the drilling programme to determine if there are any sites that require protection. Any sites identified will be marked and no drilling will be undertaken in close proximity of such a site.

### **3.5. NATIONAL ENVIRONMENTAL MANAGEMENT BIODIVERSITY ACT (ACT 10 OF 2004) (NEMBA)**

The National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEMBA) provides for the management and protection of South Africa's biodiversity within the framework established by

NEMA. The Act aims to legally provide for biodiversity conservation, sustainable, equitable access and benefit sharing and provides for the management and control of alien and invasive species to prevent or minimize harm to the environment and indigenous biodiversity. The Act imposes obligations on landowners (state or private) governing alien invasive species as well as regulates the introduction of genetically modified organisms. The Act encourages the eradication of alien species that may harm indigenous ecosystems or habitats. The NEMBA ensures that provision is made by the site developer to remove any aliens which have been introduced to the site or are present on the site.

The NEMBA also provides for listing of threatened or protected ecosystems, in one of four categories: critically endangered, endangered, vulnerable or protected. The purpose of listing protected ecosystems is primarily to conserve sites of exceptionally high conservation value.

The Act supports South Africa's obligations under sanctioned international agreements regulating international trade in specimens of endangered species, and ensures that the utilization of biodiversity is managed in an ecological sustainable way.

The BAR and EMPr has been compiled to ensure that all applicable requirements prescribed in the NEMBA are complied with.

### **3.6. MPUMALANGA NATURE CONSERVATION ACT (ACT 10 OF 1998)**

The Mpumalanga Nature Conservation Act, No. 10 of 1998, aims to consolidate and amend the laws relating to nature conservation within the province and to provide for matters connected therewith. Provincial legislation relevant to biodiversity conservation comprises of two Provincial Acts, the Mpumalanga Nature Conservation Act (Act 10 of 1998) and the Mpumalanga Tourism and Parks Agency Act (Act 5 of 2005). In relation to nature conservation, the province has developed the Mpumalanga Biodiversity Sector Plan (MBSP). This plan has been jointly developed by the Mpumalanga Tourism and Parks Agency (MTPA) and the Department of Agriculture, Rural Development, Land and Environmental Affairs (DARDLEA). The MBSP takes its mandate from the South African Constitution, the National Biodiversity Act (10 of 2004) and the Mpumalanga Nature Conservation Act 10 of 1998. Areas identified under the MBSP as sensitive were identified and where applicable measures will be proposed for ensuring that the areas are not degrade by the proposed project activities.

The BAR and EMPr has been compiled to ensure that all applicable requirements prescribed in the Act are complied with.

### **3.7. MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (MPRDA): ACT 28 OF 2002**

The Department of Mineral Resources and Energy (DMRE) is responsible for regulating the mining and minerals industry to achieve equitable access to the country's resources and contribute to sustainable development. The Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) (MPRDA) requires that an EIA be conducted and that the EMP be drafted for the mitigation of impacts identified during the environmental impact assessment for a prospecting project. During December 2014, the "One Environmental System" was implemented by Government which initiated the streamlining of the licensing processes for mining, environmental authorisations and water use. Under the One Environmental System, The Minister of Mineral Resources, will issue environmental authorisations and waste management licences in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), and the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEMWA), respectively, for mining and related activities. The Minister of Environmental Affairs will be the appeal authority for these authorisations. In view of the above the application for the

environmental authorisation for the proposed project was submitted to the Department of Mineral Resources and Energy as the competent authority.

### **3.8. NATIONAL WATER ACT (NWA): ACT NO. 36 OF 1998**

The National Water Act (Act No. 36 of 1998) (NWA) is the primary regulatory legislation, controlling and managing the use of water resources as well as the pollution thereof in South Africa. The NWA recognises that the ultimate aim of water resource management is to achieve sustainable use of water for the benefit of all users and that the protection of the quality of water resources is necessary to ensure sustainability of the nation's water resources in the interests of all water users. The NWA presents strategies to facilitate sound management of water resources, provides for the protection of water resources, and regulates use of water by means of Catchment Management Agencies, Water User Associations, Advisory Committees and International Water Management. The National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest. Further, an industry can only be entitled to use water if the use is permissible under the NWA. The enforcing authority on water users is the Department of Water and Sanitation (DWS).

Further, Regulation 704 of the NWA deals with the control and use of water for prospecting and related activities aimed at the protection of water resources.

No water use licence application will be submitted to the Department of Water and Sanitation for their consideration. However, measures will be undertaken to ensure that requirements in terms of the NWA and the GN 704 are complied with where necessary.

### **3.9. NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT (ACT NO. 59 OF 2008)**

The National Environmental Management: Waste Act (NEMWA) requires that all waste management activities must be licensed. According to Section 44 of the NEMWA, the licensing procedure must be integrated with an EIA process in terms of the NEMA.

The objectives of NEMWA involve the protection of health, wellbeing and the environment. The NEMWA provides measures for the minimisation of natural resource consumption, avoiding and minimising the generation of waste, reducing, recycling and recovering waste, and treating and safely disposing of waste.

Waste management activities are not triggered by the proposed project, hence no application in terms of the NEMWA was submitted to the Department of Mineral Resources and Energy.

### **3.10. EIA GUIDELINES**

A number of national and provincial EIA guidelines were published by different departments. These guidelines are mainly aimed at assisting relevant stakeholders by providing information and guidance and giving recommendations on a number of aspects relating to the environmental impact assessment process. The guidelines can be used by the competent authority, applicant and the EAP during the EIA process. It is therefore important that the EAP and the person compiling a specialist report must have relevant expertise when conducting the environmental impact assessments.

A number of guidelines were consulted during the compilation of this report and these include amongst them the following i.e., Guidelines on the Need and Desirability, Department of Environmental Affairs and Tourism Integrated Environmental Management Guidelines, Department of Water and Sanitation's Best Practice Guidelines and the Western Cape Provincial Department of Environmental Affairs and Development Planning Guidelines on Public Participation.

## **SECTION FOUR**

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### **NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES**

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## **4. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES**

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### **4.1. MOTIVATION FOR THE NEED AND DESIRABILITY OF THE PROJECT**

In terms of the EIA Regulations the need and desirability of any development must be considered by the relevant competent authority when reviewing an application. The need and desirability must be included in the reports to be submitted during the environmental authorisation application processes.

The section of the BAR and EMPr will indicate the need and desirability for the approval of the Witkranz prospecting project.

Assessment of the geological information available has determined that the area in question may have coal and pseudocoal reserves. In order to ascertain the above and determine the nature, location and extent of the above-mentioned mineral within the proposed prospecting area, it will be necessary for prospecting to be undertaken. The prospecting will also determine if there are any features that may have an impact on the economic extraction of the above-mentioned mineral.

The information that will be obtained from the proposed prospecting project will be necessary to determine where the mineral is located, how it can be viably extracted and the economic value of the total reserve within the prospecting area.

National Treasure Minerals (Pty) Limited predicts that substantial benefits from the area (should a viable reserve be found) will accrue to the immediate area, the sub-region and the province of Mpumalanga. These benefits must be offset against the costs of the area, including the impacts to land owners.

The potential benefits of the proposed project are:

- Potential reduction in crime because of short-term job creation during construction (providing farm safety and security measures), and also in the long-run as a result of job creation.
- Local growth in the economy of the host community and surrounding areas, and for local businesses including those that supply accommodation, transport etc.
- Economic benefits for contractors and other suppliers of goods and services.
- Economic opportunities and other potential benefits for land owners from compensation for impacts.
- Based on the environmental assessment conducted as described in this report, there are no environmental impacts associated with the proposed area that cannot be mitigated.

## **SECTION FIVE**

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### **Motivation for the Preferred Development Footprint**

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## **5. MOTIVATION FOR THE PREFERRED DEVELOPMENT FOOTPRINT**

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### **5.1. CONSIDERATION OF ALTERNATIVES**

The National Environmental Management Act 107 of 1998, Environmental Impact Assessment Regulations, 2014 requires a BAR and EMPr to identify alternatives for areas applied for. In terms of the above-mentioned regulations an alternative in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the (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.

National Treasure Minerals (Pty) Limited intends to undertake prospecting on a portion of portion 1 of the farm Witkranz 53 IT to determine whether or not the area consist of coal and pseudocoal and to also determine if the available reserves have economic value.

Therefore, a number of alternatives were considered for the proposed prospecting project. This section of the report will highlight the alternatives considered for the proposed prospecting activities.

#### **5.1.1. Location Alternatives**

The location alternative considered for the proposed project include the prospecting sites and associated campsite location and access routes. The location alternatives were selected based on a number of criteria, which include the environmental considerations (how sensitive is the area in terms of soils, wetlands, groundwater etc.), sensitive receptors (proximity to communities and farmsteads) and the dependency of the area to the required infrastructure.

#### **5.1.2. Prospecting Sites**

The prospecting sites were selected based on published relevant literature; therefore, no alternatives were considered since the anticipated minerals could be located on a portion of portion 1 of Witkranz 53 IT.

#### **5.1.3. Access Routes/Transport alternatives**

Two alternatives were considered i.e., existing road and a new road. Since the proponent would like to limit their pollution footprint, the existing access road was decided upon. The R36 route passes in close proximity to the farm, and an unnamed road passes right across the farm.

#### **5.1.4. Campsite Location**

Regarding the location of the campsite, three alternatives were considered. These locations included a static location close to the entrance of the site, a mobile campsite and an offsite campsite.

Since the site closer to the farm home steads may result in undesirable impacts on the residents of the farm steads and the offsite alternative may results in unforeseen impacts due to the unavailability of other necessary services that comes with having a local campsite these two alternatives were discarded.

The static campsite would be used during the construction phase (site establishment) of the area and the mobile alternative would be used during the operational phase of the area. Note that the mobile alternatives will move with the drilling team from site to site during the execution of the drilling programme.

### **5.1.5. Design/ Layout Alternatives**

Since no complicated surface infrastructure will be required for this area no design and layout alternatives for the proposed area were determined. The plan depicting all possible drilling sites will be compiled in consultation with the landowner and submitted with the progress to the Department of Mineral Resources and Energy (DMRE).

### **5.1.6. Technology Alternatives**

The minerals applied for are less cumbersome; hence the normal exploration technologies will be used. In view of the above, no technology alternatives were considered for this project.

### **5.1.7. Input Material Alternatives**

No in-put material alternatives were considered for this area.

### **5.1.8. Operational Alternatives**

### **5.1.9. Exploration Drilling Methods**

Drilling is used to determine the depth, thickness and quality of the mineral in question at any point across a prospecting area. Drilling is also used to determine the actual local geology of the area.

#### Non-Core Drilling Methods

Non-core drilling techniques mostly uses the rotary drilling methods. In this technique, a string of metal rods is rotated axially and a bit at the base of the string is forced downward, under controlled pressure, breaking up the ground and advancing the depth of the hole. Cuttings are swept away from the bit and lifted to the surface either by means of pumped circulating water or by jets of compressed air.

Logging of the hole drilled by non-core drilling methods is mainly based on the cuttings obtained as the drill progresses. In view for the difficulty and error bound logging, this method of drilling was discarded and may be used only for infill drilling wherever necessary.

#### Core-Drilling Methods

Core drilling techniques uses diamond drilling methods. In this technique, a hollow cylindrical drill bit impregnated with industrial diamonds is attached to a series of metal drill rods and rotated under controlled downward pressure. A circle of rock is ground away, the cutting removed by water flushing and a cylindrical core remains in the hollow centre of the drill string.

Core drilling is the only satisfactory means of obtaining representative samples of seams at depth for quality determination. In view of the above, the preferred drilling methods is the core drilling technique using the diamond drill.

#### **5.1.9.1. Transportation**

See access route alternatives.

### **5.1.10. No Go Option**

National Treasure Minerals (Pty) Limited intends to prospect for the above-mentioned minerals. Should the project not commence, the following will result i.e.:

The reserve's economic value will not be known thus no mine will commence, which will result in the potential labour force losing their employment opportunity and all support that the mine would have provided to the local businesses which will boost the economy of the country.



Potential mining operations will also assist with the establishment of small and medium businesses and infrastructure development, community development and poverty eradication as well as to boost the local economy in the surrounding previously disadvantaged communities. Since the proposed prospecting process itself will have very low environmental impacts, as detailed in the EMPr, investigating the feasibility of future mining operations should be considered.

#### **5.1.11. Concluding Statement**

Based on the above, the proposed Witkranz prospecting project, situated on a portion of portion 1 of the farm Witkranz 53 IT; accessed via the R36 Provincial Road and unnamed farm access road is preferred for the proposed prospecting project.

### **5.2. DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED AND RESULTS THEREOF**

Public participation is the cornerstone of any EIA process. The principles of the NEMA govern many aspects of EIA's, including public participation. The general objectives of integrated environmental management laid down in the NEMA include to "ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment". The National Environmental Management Principles include the principle that "The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary to achieve equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured", which basically means that the person responsible for the application (EAP) must ensure that provision of sufficient and transparent information on an ongoing basis to stakeholders are made to allow them to comment, and to ensure that the participation of previously disadvantaged people like women and the youth are undertaken.

In terms of the EIA Regulations, 2014, when applying for environmental authorisation, the Environmental Assessment Practitioner managing the application must conduct at least a public participation process where all potential and registered interested and affected parties, including the competent authority, are given a period of at least 30 days to submit comments on each of the basic assessment reports, environmental management programme, scoping report and environmental impact assessment report, and where applicable the closure plan. In this case a Basic Assessment Report (BAR) is considered.

This section of the BAR and EMPr will give an explanation of the public participation process taken in order to comply with the above-mentioned requirements. A number of public participation guidelines were published in a bid to assist persons responsible for the environmental authorisation applications. As much of the available guidelines were used in determining the public participation process, in guiding the public participation process of the proposed project.

Geovicon Environmental (Pty) Limited on behalf of National Treasure Minerals (Pty) Limited is applying for an environmental authorisation for the proposed Witkranz prospecting project. The application for the environmental authorisation is undertaken in terms of the process as laid out in part 2 of Chapter 4 under the NEMA EIA Regulations, 2014. The above-mentioned regulations require that an applicant for an environmental authorisation submit a BAR and EMPr to the competent authority after having subjected the reports to a public participation process.

In view of the above, a public participation process was initiated for the proposed Witkranz prospecting project. The public participation process for the proposed project was designed to provide sufficient and accessible information to interested and affected parties (I&APs) in an objective manner to assist them to:

- raise issues of concern and make suggestions for enhanced benefits;
- contribute local knowledge and experience;
- verify that their issues have been captured;
- verify that their issues have been considered in the technical investigations; and
- comment on the findings of the EIA.

The following will be conducted in the undertaking of the public participation process for the proposed project.

#### **5.2.1. Registration and BAR Phase**

The public participation process commenced with the provision of potential Interested and affected parties (I&AP's) 30 days to register as interested and affected parties and to comment on the draft BAR and EMPr. The registration and commenting process starts on the 3<sup>rd</sup> of February 2022 and ends on the 7<sup>th</sup> of March 2022. Note that all parties are provided enough time (at least 30 days) to comment on the report.

##### **5.2.1.1. Notification of potential interested and affected parties**

The following methods of notification were used to notify the potential interested and affected parties of the opportunity to register during the public participation process for the proposed project:

- On the 3<sup>rd</sup> of February 2022, notices were posted in the Highvelder Newspaper which is distributed in host and surrounding town of the proposed prospecting area, informing the public that the BAR is in the Carolina public library. The notices were compiled in compliance with the requirements of Regulation 41(3) of the EIA Regulations, 2014.
- Written notices were sent to all surface owners and lawful occupiers of the land on which the proposed prospecting project will be undertaken.
- Site notices inviting the public to register as interested and affected parties were also used to invite comments on the BAR and EMPr from the public.
- The draft BAR and EMPr was also submitted to all the commenting authorities for their comments.
- A copy of the draft BAR and EMPr was placed in the Carolina local library.

##### **5.2.1.2. Registered Interested and Affected Parties**

The following are currently registered as interested and affected parties for the Witkranz prospecting project:

- Department of Mineral Resources and Energy, Mpumalanga Regional Office (Competent Authority).
- National Department of Agriculture, Forestry and Fisheries, Mpumalanga Regional Office (Commenting Authority).
- South African Heritage Resources Agency (Commenting Authority).
- Department of Public Works, Roads and Transport – Mpumalanga.

- Department Of Rural Development and Land Reform.
- Department of Water and Sanitation.
- Ward 25 Councillor (Chief Albert Luthuli Local Municipality).
- Chief Albert Luthuli Local Municipality.
- Land owners and lawful occupiers within the Witkranz project's area.
- Land owners and lawful occupiers immediately adjacent to the project's area.

#### 5.2.1.3. Proof of Consultation

Proof of the above-mentioned consultation and results; thereof, will be included in the final BAR and EMPr.

#### 5.2.1.4. Finalisation of Interested and Affected Party Database

On expiry of registration period, the database of interested and affected parties will be finalised. All parties who indicated the interest of being registered as interested and affected parties will be added to the list of interested and affected parties.

Note: All organs of state, which have jurisdiction in respect of any aspect of the proposed project and the competent authority are automatically registered as interested and affected parties.

### **5.2.2. Draft Basic Assessment Report**

The draft BAR and EMPr is made available for comment to all relevant stakeholders during the above-mentioned registration phase of the proposed project's public participation process.

#### 5.2.2.1. Comments, Issues and Responses on the Draft Basic Assessment Report

The comments and issues that will be raised by the interested and affected parties will be addressed and included in the final BAR and EMPr.

## **5.2. ENVIRONMENTAL ATTRIBUTES (BASELINE INFORMATION)**

### **5.2.1. Geology**

#### 5.2.1.1. Regional Geology

The Witbank Coalfield is a basin like feature that extends from Brakpan in the West through to Balfast in the East. The northern boundary is the sub-crop against the pre-Karoo basement rocks of predominantly the Waterberg sandstones and south is a predominantly pre-Karoo basement ridge called the Smith ridge. The basin was formed in the shallow cratonic paralic environment with slow but consistent subsidence during the late Carboniferous and early Permian. This basin was first exploited before the beginning of the 20th Century in the Brakpan (Apex Mines region) and has been the focus of concerted exploration and exploitation since.

The basin is the type area for the multiple Seam deposit type with the development of five major Seam horizons which may in places be composite Seams. The major controls on the development of the coal are proximity to undulations of the "basement" topography, through erosion channeling and sediment influx into swamp beds and finally erosion of the current erosion surface. The primarily economic coal Seams have been the No. 2 Seam, The No. 4 and No. 4 Lower Seam and in place the No. 5 Seam. Structurally the coal horizons are unreformed with each displaying a very slight dip to the south east of less than a degree and minor discrete faulting events that have a southwest to northeast trend of graben features and other minor faulting events. The most distinctive post-depositional feature is the intrusion of dolerites

related to the Lesotho Basalts that have resulted in a variety of sills and dykes of various ages. The most prominent of the dykes in the area is the Ogies dyke a 12 to 20m thick essentially vertical intrusion with an east-west strike. The No. 4 Dolerite sill, a 20 to 70m thick multiple flow event, has a preferential intrusion horizon above the No. 5 coal Seam, but in places it transgresses through the coal bearing strata to the pre-Karoo basement and forms in other places a barrier to erosion. The large amount of exploitation in the region has resulted in the development of an efficient coal transportation infrastructure that is now resulting in previously uneconomic coal Seams such as the No. 1 and No. 2 Lower coal Seams becoming economic propositions.

### **5.2.2. Climate**

#### 5.2.2.1. Regional Climate

Witkrantz prospecting project area falls within the summer rainfall region of South Africa, in which more than 80% of the annual rainfall occurs from October to March. Eighty five percent of the rain falls during summer thunderstorms occurring every 3 - 4 days in summer. They occur in the form of conventional thunderstorms, are usually of short duration and high intensity and accompanied by lightning, strong winds, and sometimes hail.

#### 5.2.2.2. Mean Monthly Rainfall and Evaporation

The mean annual precipitation of the area is 607 mm. This is appreciably lower than the MAP for the area (Quaternary mean annual precipitation = 688 mm). The mean annual evaporation of area is 1 446 mm (S-Pan). The monthly average rainfall, rainfall days, and evaporation rates are presented in Table 4. The Mpumalanga Highveld has distinct wet and dry seasons. 92% of the area's mean annual rainfall

falls between October and April inclusively. 67% of the area's mean annual evaporation occurs in this period (Midgley et al., 1990).

**Table 4: Mean monthly rainfall, rain days and evaporation data for the site.**

Month	Ave Rainfall (mm)	Ave rain days	Ave Evaporation (mm S-Pan)
October	72.0	8.2	137.4
November	105.6	11.2	137.1
December	105.7	11.2	155.7
January	101.5	10.6	163.1
February	75.9	7.6	139.8
March	67.7	7.9	137.2
April	31.8	4.2	104.1
May	9.5	2.2	90.8
June	5.4	0.8	74.6
July	4.4	0.8	80.5
August	8.0	1.2	101.9
September	21.1	2.8	123.6
<b>Mean Annual</b>	<b>607*</b>	<b>68.5</b>	<b>1 446</b>

#### 5.2.2.3. Climatic Water Balance

The Department of Water and Sanitation require a climatic water balance that incorporates a list of years which have the wettest six months of the year, either November to April or May to October. In this case November to April is wetter than May to October. The wettest six months between November and April are listed in Table 5.

**Table 5: Wettest years between November and April**

Rating	Year	Total rainfall between November and April (mm)
Wettest year	1984	937.5
2 <sup>nd</sup> wettest year	1961	857
3 <sup>rd</sup> wettest year	1918	832.3
4 <sup>th</sup> wettest year	1991	811
5 <sup>th</sup> wettest year	1990	794.5
6 <sup>th</sup> wettest year	1967	799

7 <sup>th</sup> wettest year	1975	773
8 <sup>th</sup> wettest year	1987	762.5
9 <sup>th</sup> wettest year	1923	760.2
10 <sup>th</sup> wettest year	1915	756.2

#### 5.2.2.4. Peak Rainfall Data

##### 5.2.2.4.1. Maximum Monthly Rainfall Data

The maximum monthly rainfall data was distilled from the daily rainfall record and is presented in Table 6.

**Table 6: Maximum monthly rainfall data (mm).**

Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
209	295.5	238.7	242	196	202.5	97.5	69	71.5	44	66.7	147

##### 5.2.2.4.2. Peak 24-hr Rainfall Data

The peak 24-hr rainfall depths are presented in Table 7.

**Table 7: Peak 24-hr rainfall depths for the site.**

Recurrence Interval (year)	24-hour rainfall depth (mm)
2	41
10	77
20	93
50	113
100	130
200	148

The area is generally a summer-rainfall region, with very dry winters. Figure 17 shows a climate diagram for the Eastern Highveld Grassland vegetation unit.

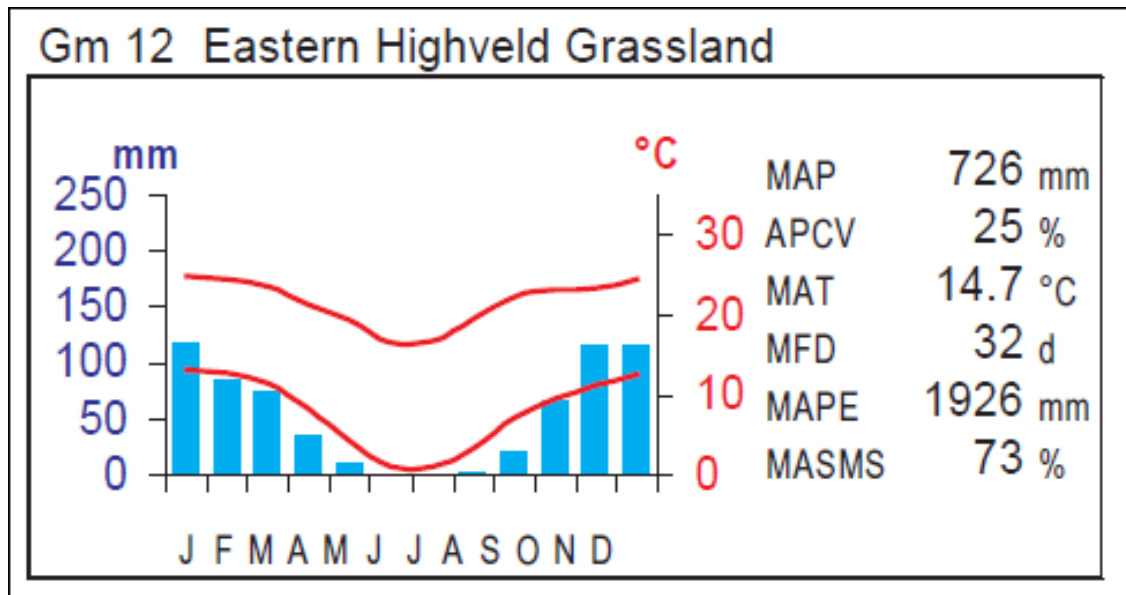


Figure 6: Climate diagram for the Eastern Highveld Grassland subdivision

**MAP – Mean Annual Precipitation**

**MFD – Mean Frost Days**

**APCV – Annual Precipitation Coefficient of variation**

**MAPE – Mean Annual Potential Evaporation**

**MAT – Mean Annual Temperature**

**MASMS – Mean Annual Soil Moisture Stress**

5.2.2.5. Mean monthly temperature

The mean maximum and minimum temperatures, extrapolated from the Pretoria, Middelburg, Belfast and Carolina weather stations are presented in Table 8.

Table 8: Mean monthly temperature data for 0515320 (Carolina).

Month	Temperature (°C)		
	Mean	mean max	Mean min
January	18,9	24,5	13,4
February	18,4	23,8	12,9
March	17,6	23,2	12,0
April	15,0	21,0	9,0
May	12,1	19,0	5,2
June	9,0	16,2	1,8
July	9,7	17,1	2,4
August	11,9	19,4	4,5

September	14,8	22,2	7,5
October	16,3	22,8	9,6
November	17,3	23,1	11,4
December	18,4	24,1	12,8
Total	179,4	256,4	102,5
Average	27,6	39,4	15,8



### 5.2.2.6. Wind Direction and Speed at the Mine

Wind direction and speed for the Carolina area is provide in Table 9 below.

**Table 9: Average Wind Speed and Direction.**

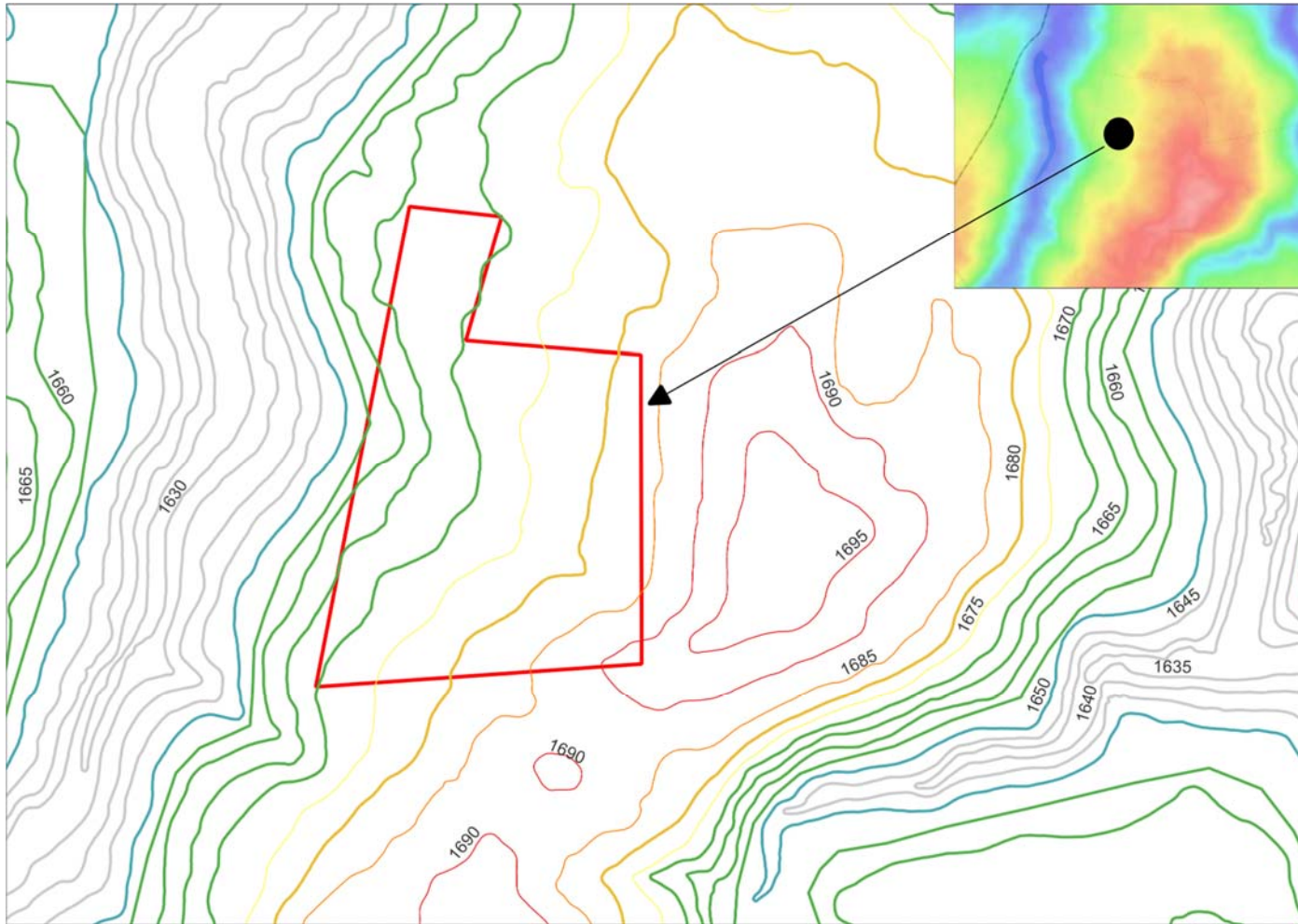
	N		NE		E		SE		S		SW		W		NW	
	N	V	N	V	N	V	N	V	N	V	N	V	N	V	N	V
<b>Jan</b>	110	2,7	214	3,0	139	3,1	82	4,3	32	3,0	65	2,9	90	3,4	115	2,9
<b>Feb</b>	78	2,7	213	3,3	169	3,2	143	4,1	41	3,0	50	3,3	74	3,0	91	2,9
<b>Mar</b>	93	2,5	217	3,1	179	2,9	103	3,3	40	2,6	48	2,8	73	3,2	90	2,7
<b>Apr</b>	89	2,4	174	2,8	124	2,8	75	3,1	40	2,5	84	3,2	111	3,3	128	2,9
<b>May</b>	105	2,4	127	2,8	107	2,9	83	3,2	48	3,0	67	3,5	111	3,5	124	3,0
<b>Jun</b>	78	2,3	121	2,6	102	2,6	55	3,2	45	3,1	106	4,0	113	3,6	137	2,9
<b>Jul</b>	95	2,3	139	2,6	97	2,9	64	3,7	38	3,1	89	3,7	111	3,5	128	3,0
<b>Aug</b>	108	2,7	161	3,5	102	3,2	41	4,2	34	3,2	81	4,5	123	4,5	187	3,3
<b>Sep</b>	116	2,9	207	3,5	120	3,6	59	4,1	31	3,0	73	3,9	109	3,9	162	3,7
<b>Oct</b>	106	2,9	212	3,4	123	3,9	52	3,3	24	3,4	59	3,5	112	3,7	172	3,6
<b>Nov</b>	102	3,0	186	3,4	133	3,4	45	3,9	30	3,1	69	3,1	153	3,9	164	3,4
<b>Dec</b>	108	2,9	208	3,2	138	3,1	55	3,8	33	3,2	61	3,1	125	3,0	141	3,3
<b>Year</b>	99	2,6	182	3,1	128	3,1	71	3,7	36	3,0	71	3,5	109	3,6	137	3,2

The area is prone to host extreme events on a regular basis. These events include the following:

- The area is prone to drought conditions.
- Regular frost occurs during the winter months.
- Rainfall occurs as scattered thunderstorms.

### 5.2.3. Topography

The elevation of the surrounding area ranges from 1605 m above sea level to 1690 m above sea level (**Error! Reference source not found.**). The surrounding area is considered undulating and consists of hills and valleys, often with streams in the valleys and pans in the hills.



\*\*the black dot indicates the centre of the proposed prospecting area. Map extracted from topographic-map.com.

**Figure 7: Elevation figure.**

#### **5.2.4. Land Use**

The land in the area is mainly used for crop production and limited grazing. Adjacent land is used for crop production, grazing and has a farm dam and farm properties.

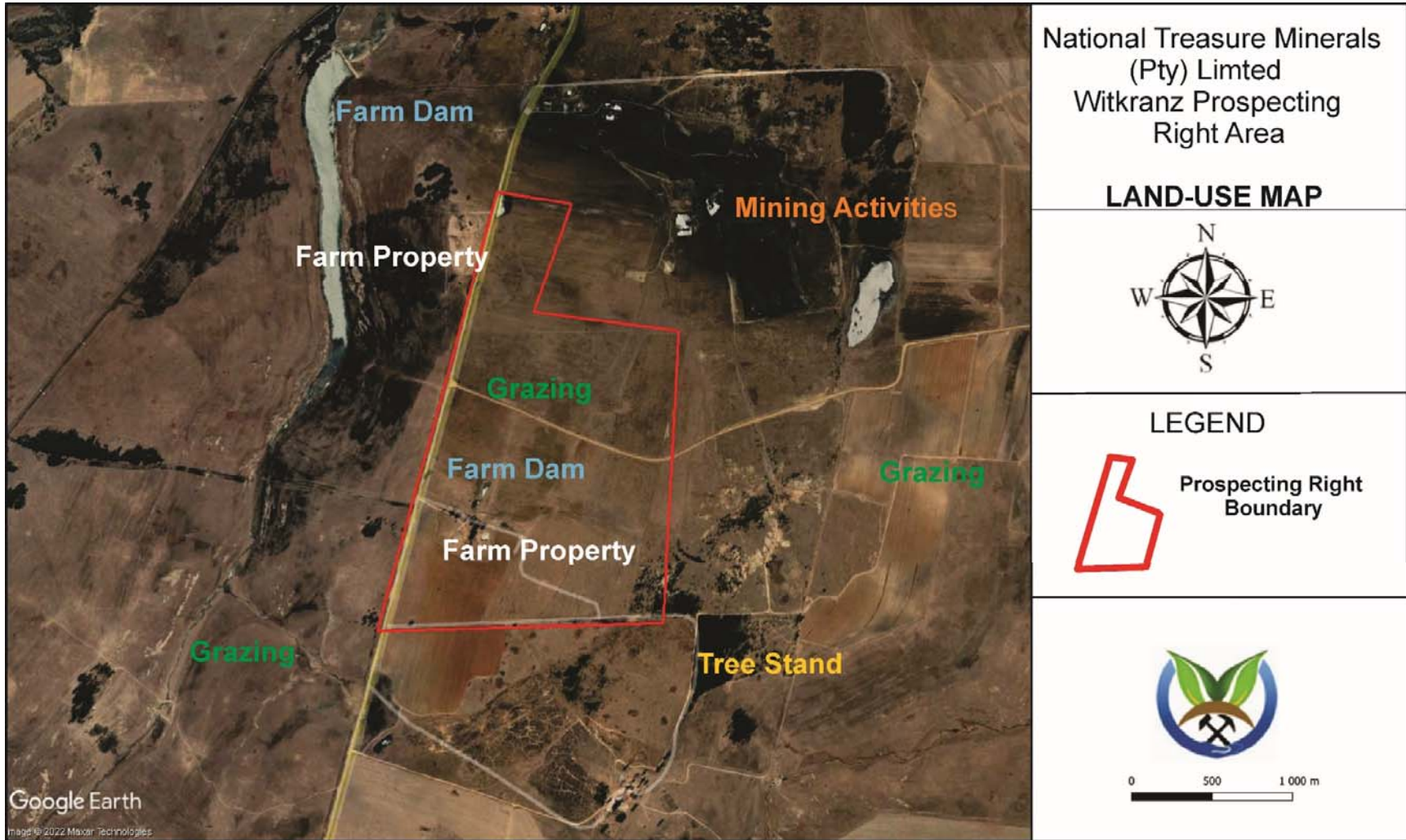


Figure 8: Current land-use map.

### 5.2.5. Natural Vegetation/Plant Life

The list of the dominant taxa in the Eastern Highveld Grassland vegetation unit / ecosystem is shown in **Error! Reference source not found.** below.

**Table 10: List of natural vegetation**

SCIENTIFIC NAME	COMMON NAME
<b>Graminoids (Grass like plants)</b>	
<i>Aristida aequiglumis</i>	Three-awn
<i>Aristida congesta</i>	Tassel three-awn
<i>Aristida junciformis</i>	Gongoni three-awn
<i>Brachiaria serrata</i>	Velvet signal grass
<i>Cynodon dactylon</i>	Couch grass
<i>Digitaria monodactyla</i>	One finger grass
<i>Digitaria tricholaenoides</i>	Purple finger grass
<i>Elionurus muticus</i>	Wire grass
<i>Eragrostis chloromelas</i>	Narrow curly leaf
<i>Eragrostis curvula</i>	Weeping love grass
<i>Eragrostis plana</i>	Tough love grass
<i>Eragrostis racemosa</i>	Narrow heart love grass
<i>Eragrostis sclerantha</i>	Love grass
<i>Heteropogon contortus</i>	Spear grass
<i>Loudetia simplex</i>	Common russet grass
<i>Microchloa caffra</i>	Pincushion grass
<i>Monocymbium ceresiiforme</i>	Boat grass
<i>Setaria sphacelata</i>	Bristle grass
<i>Sporobolus africanus</i>	Ratstail dropseed
<i>Sporobolus pectinatus</i>	Dropseed
<i>Themeda triandra</i>	Red grass

<i>Trachypogon spicatus</i>	Giant spear grass
<i>Tristachya leucothrix</i>	Trident grass
<i>Tristachya rehmannii</i>	Trident grass
<b>Herbs (Forbs, plants)</b>	
<i>Berkheya setifera</i>	Rasperdissedoring
<i>Haplocharpa scaposa</i>	Tonteldoosbossie
<i>Justicia anagalloides</i>	-
<i>Pelargonium luridum</i>	-
<i>Acalypha angustata</i>	Copper leaf
<i>Chamaecrista mimosoides</i>	Fishbone cassia
<i>Dicoma anomala</i>	Maagbitterwortel
<i>Euryops gilfillanii</i>	-
<i>Euryops transvaalensis</i>	-
<i>Helichrysum aureonitens</i>	-
<i>Helichrysum caespitium</i>	Speelwonderboom
<i>Helichrysum calicomum</i>	-
<i>Helichrysum oreophilum</i>	-
<i>Helichrysum rugulosum</i>	-
<i>Ipomoea crassipes</i>	-
<b>Geophytic herbs</b>	
<i>Gladiolus crassifolius</i>	-
<i>Haemanthus humilis</i>	-
<i>Hypoxis rigidula</i>	Kaffertulp
<i>Ledebouria ovatifolia</i>	-
<b>Succulent herbs</b>	
<i>Aloe ecklonis</i>	Ecklone's aloe

<b>Low shrubs</b>	
<i>Anthospermum rigidum</i>	-
<i>Stoebe plumose</i>	-

### 5.2.6. Animal life

The list of animal life found in the Eastern Highveld Grassland vegetation unit / ecosystem is listed in **Error! Reference source not found.**,

and **Error! Reference source not found.**

**Table 11:List of Mammals at the GM 12 Eastern Highveld Grassland biome**

Species	Common Name	Conservation Status	
		Regional (SANBI, 2016)	IUCN (2017)
<i>Aonyx capensis</i>	Cape Clawless Otter	NT	NT
<i>Atilax paludinosus</i>	Water Mongoose	LC	LC
<i>Canis mesomelas</i>	Black-backed Jackal	LC	LC
<i>Crociodura mariquensis</i>	Swamp Musk Shrew	NT	LC
<i>Cynictis penicillata</i>	Yellow Mongoose	LC	LC
<i>Damaliscus pygargus</i>	Blesbok	LC	LC
<i>Dasymys incomtus</i>	African Marsh rat	NT	LC
<i>Gerbilliscus brantsii</i>	Highveld Gerbil	LC	LC
<i>Hystrix africaeaustralis</i>	Cape Porcupine	LC	LC
<i>Leptailurus serval</i>	Serval	NT	LC
<i>Lepus saxatilis</i>	Scrub Hare	LC	LC
<i>Orycteropus afer</i>	Aardvark	LC	LC
<i>Otomys auratus</i>	Vlei Rat (Grassland type)	NT	NT
<i>Pedetes capensis</i>	Springhare	LC	LC
<i>Rhabdomys pumilio</i>	Four-striped Grass Mouse	LC	LC
<i>Suricata suricatta</i>	Suricate	LC	LC
<i>Sylvicapra grimmia</i>	Common Duiker	LC	LC



**Table 12: List of Bird Species at the GM 12 Eastern Highveld Grassland biome.**

Species	Common Name	Status
<i>Acridotheres tristis</i>	Indian myna	Common resident
<i>Bubulcus ibis</i>	Cattle egret	Common resident
<i>Colius striatus</i>	Mouse bird	Common resident
<i>Streptopelia capicola</i>	Cape Turtle-Dove	Common resident
<i>Vanellus armatus</i>	Blacksmith Plover	Common resident

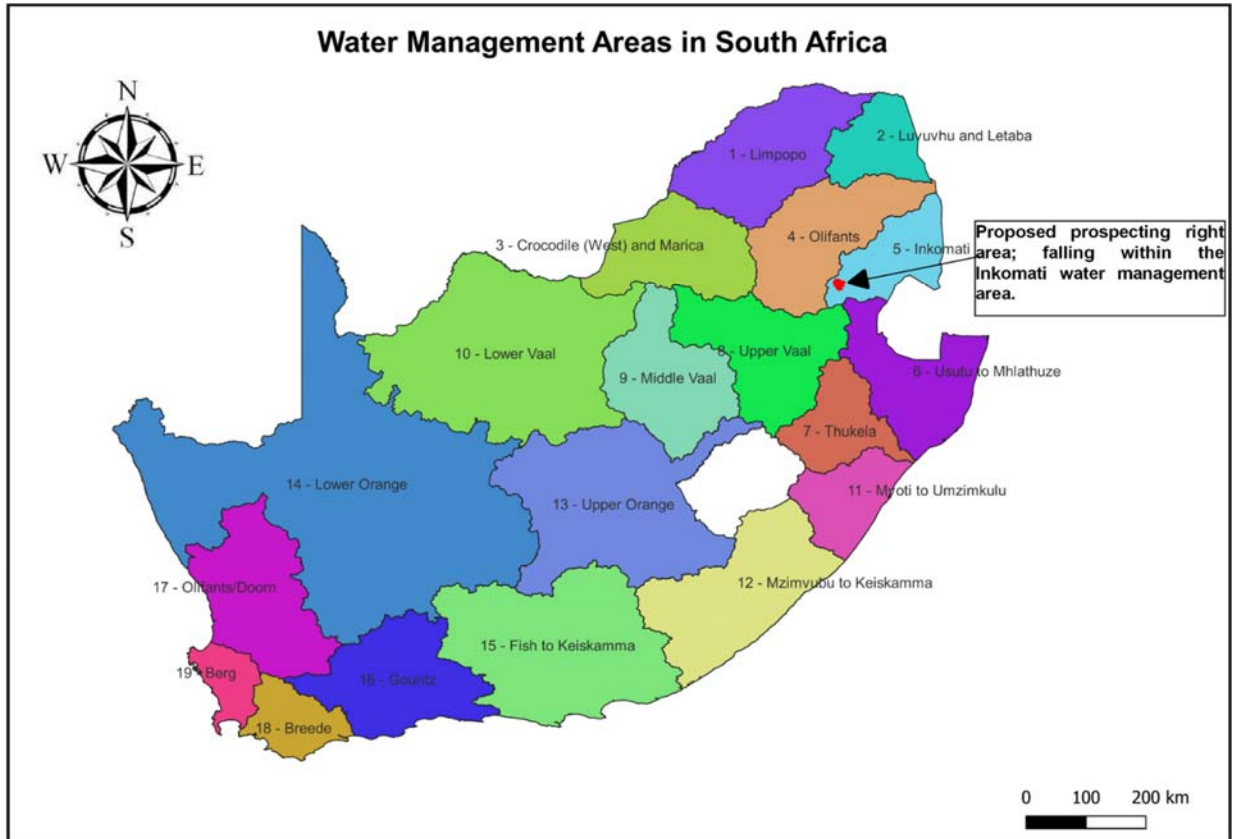
**Table 13: List of Invertebrates at the GM 12 Eastern Highveld Grassland biome.**

Species	Common Name	Conservation Status	
		Regional (SANBI, 2016)	IUCN (2017)
Amphibians			
<i>Amietia delalandii</i>	Common River Frog	LC	Unlisted
<i>Strongylopus fasciatus</i>	Striped Stream Frog	LC	LC

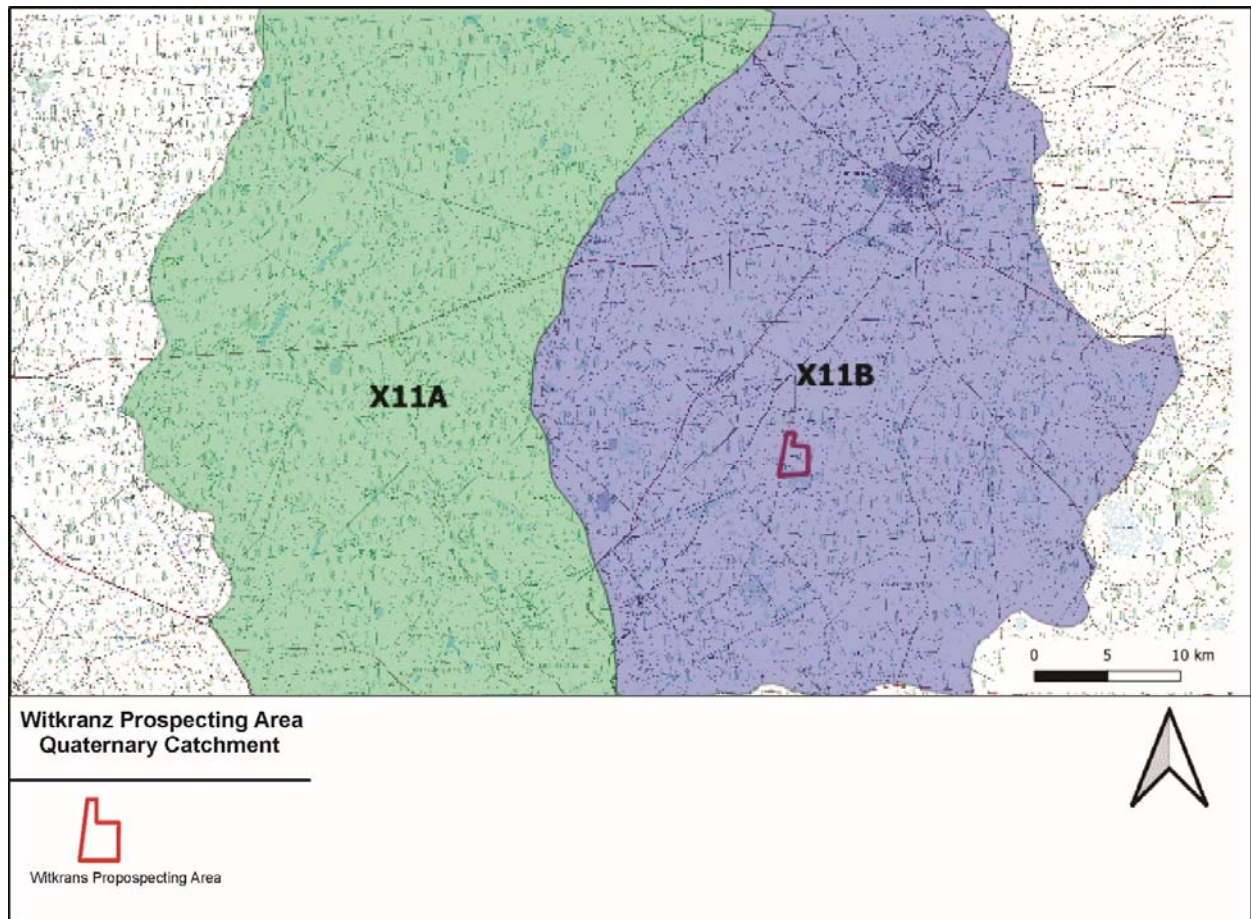


**5.2.7. Surface Water**

The Witkrantz prospecting area falls within the Inkomati Water Management Area Figure 9. The site is located in the quaternary catchment X11B near the Boesmanspruit Stream **Error! Reference source not found..**



**Figure 9: Water management areas**



**Figure 10: Quaternary catchment areas of the proposed prospecting area.**

#### **River diversions**

No river diversions are planned for the prospecting activities covered by this report.

#### **Water Use**

The likely downstream users were determined by examining aerial photography and literature surveys.

The downstream users were therefore considered in the stream. The downstream usage classes are evaluated below:

- Domestic users – local inhabitants may consume this river water and will likely also use the water for laundry.
- Recreational users – it is likely that local inhabitants will swim in the streams.
- Aquatic users – fishing.
- Irrigation users – the river water is might to be used for small-scale or informal irrigation.
- Livestock – the river water is likely to be used for drinking by livestock.

#### **Water Authority**

The catchment area is government water-controlled catchment. The authority in charge is the Department of Water and Sanitation (Mpumalanga Regional Office).

## **5.2.8. Groundwater**

### **5.2.8.1. Aquifer classification.**

According to literature the Karoo Supergroup sediments typically act as secondary aquifers (intergranular and fractured rock aquifers). However, the multi-layered weathering system present on these rocks could prove to have up to two aquifer systems present in the form of a shallow, regolith aquifer with a weathered, intergranular soft rock base associated with the contact of fresh bedrock and the weathering zone; and a fractured bedrock aquifer. These aquifer systems are discussed below.

#### **Saturated Zone**

In the saturated zone, at least four aquifer types may be inferred from knowledge of the geology of the area:

- A shallow aquifer formed in the weathered zone, perched on the fresh bedrock.
- An intermediate aquifer formed by fracturing of the Karoo sediments.
- Aquifers formed within the more permeable coal seams and sandstone layers.
- Aquifers associated with the contact zones of the dolerite intrusives.

Although these aquifers vary considerably regarding geohydrological characteristics, they are seldom observed as isolated units. Usually, they would be highly interconnected by means of fractures and intrusions. Groundwater will thus flow through the system by means of the path of least resistance in a complicated manner that might include any of these components.

#### **Shallow perched aquifer**

A near surface weathered zone is comprised of transported colluvium and *in-situ* weathered sediments and is underlain by consolidated sedimentary rocks (sandstone, shale and coal). Groundwater flow patterns usually follow the topography, often coming very close to surface in topographic lows, sometimes even forming natural springs. Experience of Karoo geohydrology indicates that recharge to the perched groundwater aquifer is relatively high, up to 3% of the Mean Annual Precipitation (MAP).

#### **Fractured Karoo rock aquifers**

The host geology of the area consists of consolidated sediments of the Karoo Supergroup and consists mainly of sandstone, shale and coal beds of the Vryheid Formation of the Eccca Group. Most of the groundwater flow will be along the fracture zones that occur in the relatively competent host rock. The geology map does not indicate any major fractures zones in this area, but from experience it can be assumed that numerous major and minor fractures do exist in the host rock. These conductive zones effectively interconnect the strata of the Karoo sediments, both vertically and horizontally into a single, but highly heterogeneous and anisotropic unit.

#### **Aquifers associated with coal seams**

The coal seam forms a layered sequence within the hard rock sedimentary units. The margins of coal seams or plastic partings within coal seams are often associated with groundwater. The coal itself tends to act as an aquitard allowing the flow of groundwater at the margins.

#### **Aquifers associated with dolerite intrusives**

Dolerite intrusions in the form of dykes and sills are common in the Karoo Supergroup, and are often encountered in this area. These intrusions can serve both as aquifers and aquifuges. Thick, unbroken dykes inhibit the flow of water, while the baked and cracked contact zones can be highly conductive. These conductive zones effectively interconnect the strata of the Eccca sediments both vertically and horizontally into a single, but highly heterogeneous and anisotropic unit on the scale of mining. These structures thus tend to dominate the flow of groundwater. Unfortunately, their location and properties

are rather unpredictable. Their influence on the flow of groundwater is incorporated by using higher than usual flow parameters for the sedimentary rocks of the aquifer.

### **Unsaturated zone**

Although a detailed characterization of the unsaturated zone is beyond the scope of this study, a brief description thereof is supplied.

The unsaturated zone in the proposed mining area is in the order of between 1 and 20 meters thick and consists of colluvial sediments at the top, underlain by residual sandstone/siltstone/mudstone of the Ecca Group that becomes less weathered with depth.

**According to the Parsons Classification system, the aquifer could be regarded as a minor aquifer system, but also a sole aquifer system in some cases where groundwater is the only source of domestic water**

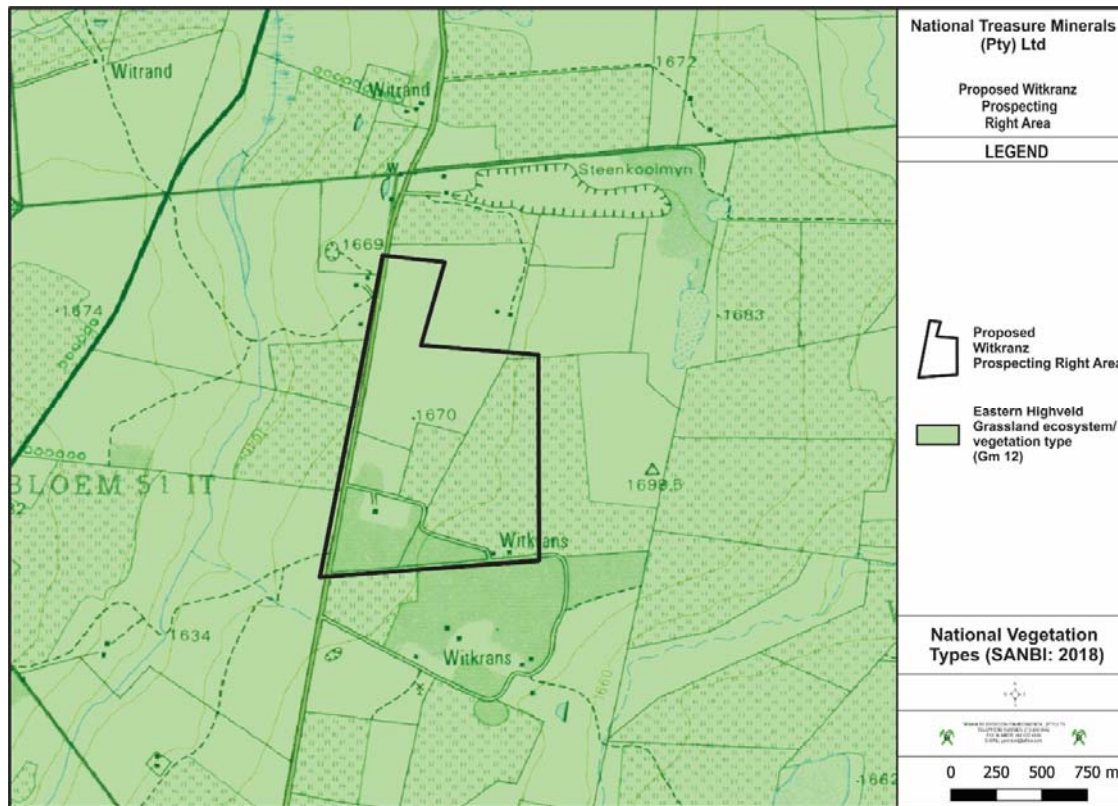
## **5.2.9. Sensitive Landscapes**

### **5.2.10.1 Sensitive Landscapes**

National Treasure Minerals (Pty) Limited recognises that all streams and wetlands should be treated as sensitive landscapes. To this extent, Geovicon Environmental (Pty) Limited an independent consultant, undertook a desktop study over the Witkranz prospecting right area to determine the presence of any sensitive areas. According to the study there are sites that resembles sensitive landscapes which were identified in close proximity to the site. See **Appendix C** for the Screening Tool Report.

### **Desktop Ecological Assessment- Witkranz Prospecting Right Application.**

The proposed Witkranz prospecting right area is situated in the Eastern Highveld Grassland vegetation type/ ecosystem (Gm 12) in the Grassland Biome See Figure 11 for a visual indication (South African National Biodiversity Institute – SANBI; VEGMAP 2018).



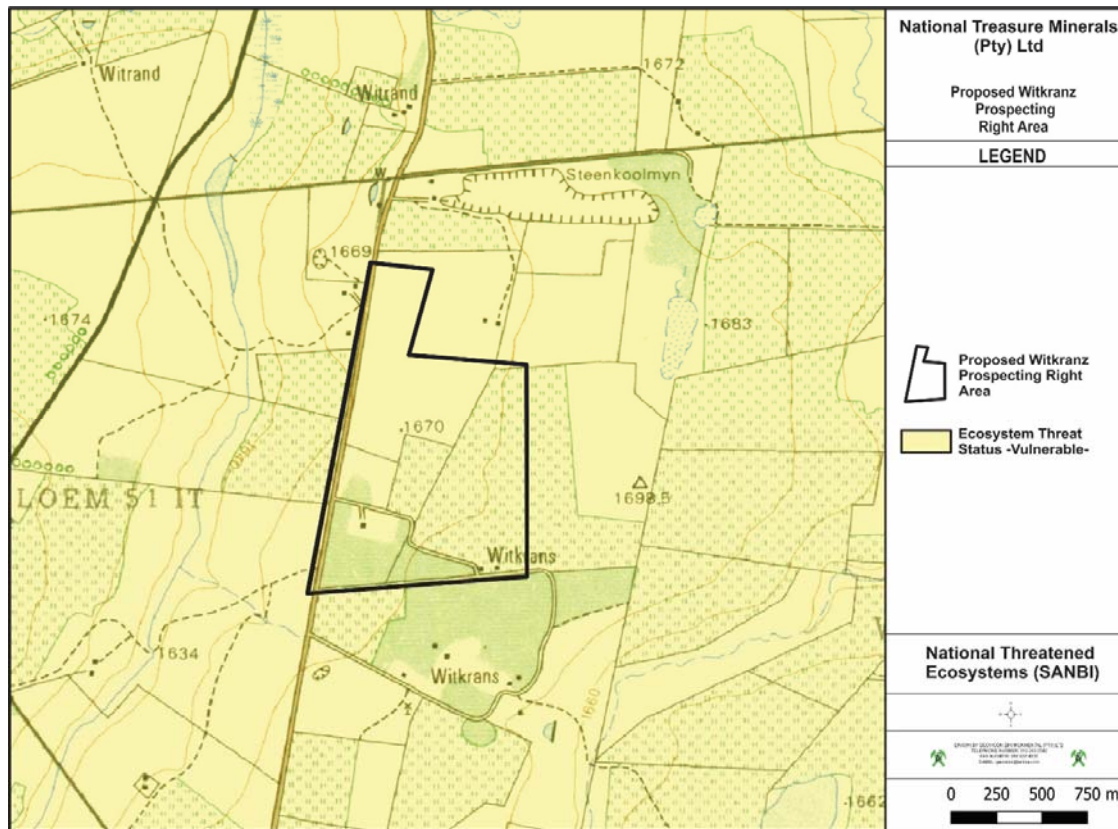
**Figure 11: National vegetation types in the vicinity of the proposed Witkrantz prospecting right area**

Mucina & Rutherford (2006) describes the vegetation that represent the above-mentioned vegetation type.

The list of the dominant taxa in the Eastern Highveld Grassland vegetation unit / ecosystem is shown in table 10.

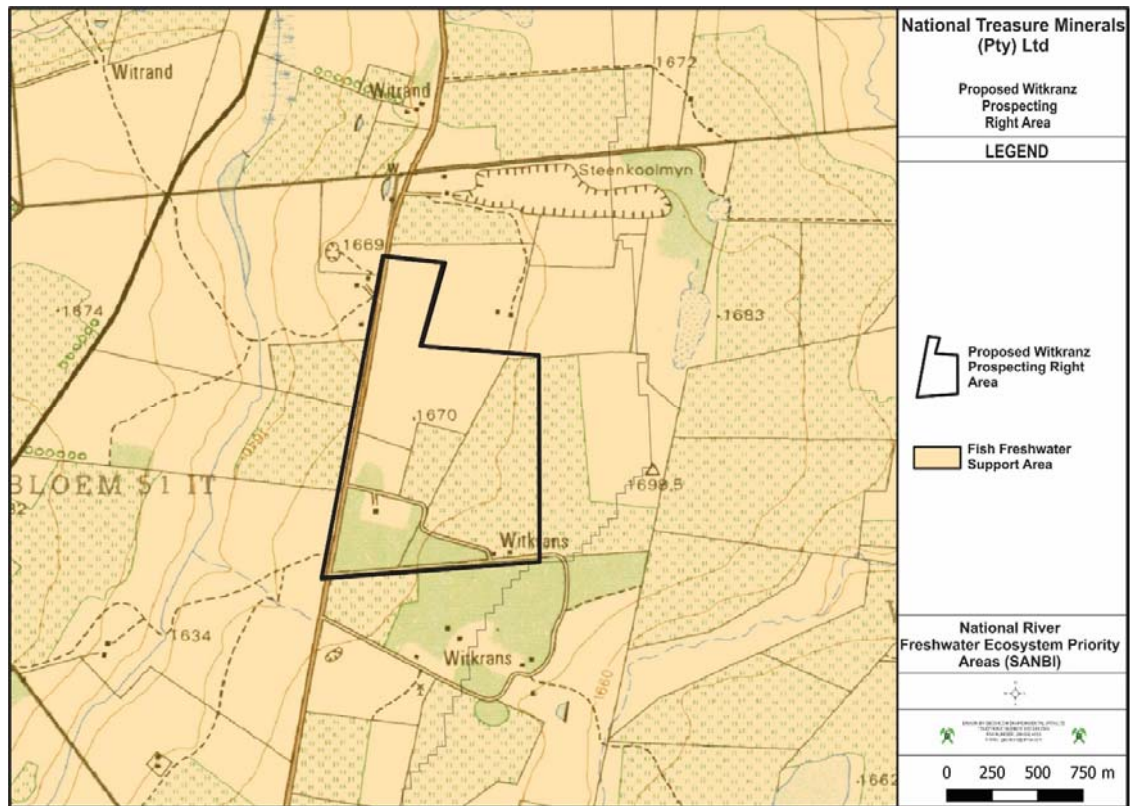
According to Government Notice 1002, (Government Gazette No. 34809 9 December 2011), vulnerable ecosystems are considered threatened ecosystems since it is ecosystems that have a high risk of undergoing significant degradation of ecological structure, function or composition as a result of human intervention, although they are not critically endangered ecosystems or endangered ecosystems





**Figure 12: National Threatened Ecosystems in the vicinity of the proposed Witkrantz prospecting area**

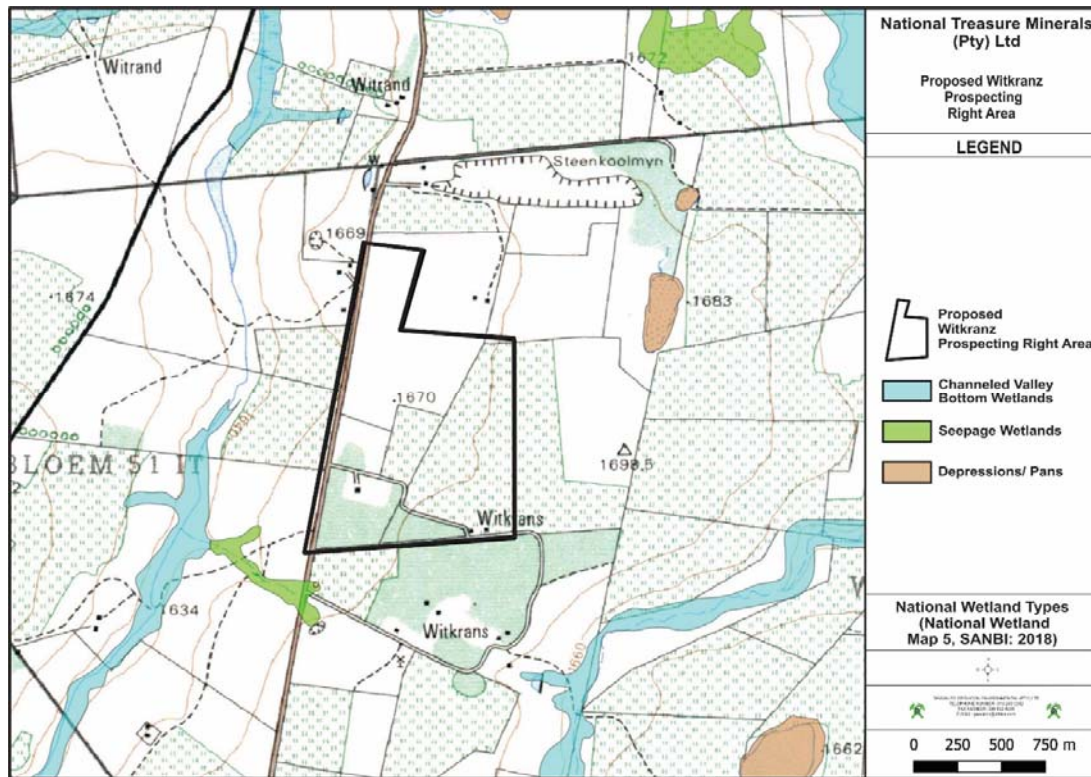
The proposed Witkrantz prospecting right area is situated in the vicinity of National River Freshwater Ecosystem Priority Areas. According to the Mpumalanga Biodiversity Sector Plan A river FEPA is described as the river reach that is required for meeting biodiversity targets for river ecosystems and threatened fish species. In managing the condition of a river FEPA, it is important to manage not only the river itself, but also the network of streams and wetlands as well as land-based activities in the sub-catchment that supports the river FEPA. A proportion of tributaries and wetlands need to remain healthy and functional in order for the river FEPA to be kept in a good ecological condition. This requires that management activities are focussed on maintaining water quantity and quality and the integrity of natural habitat in the sub-catchment. Fish support areas (that are not already FEPAs) are sub quaternary catchments that are not in top ecological condition, but are still important for supporting threatened and near-threatened indigenous freshwater fish populations that are of conservation concern.



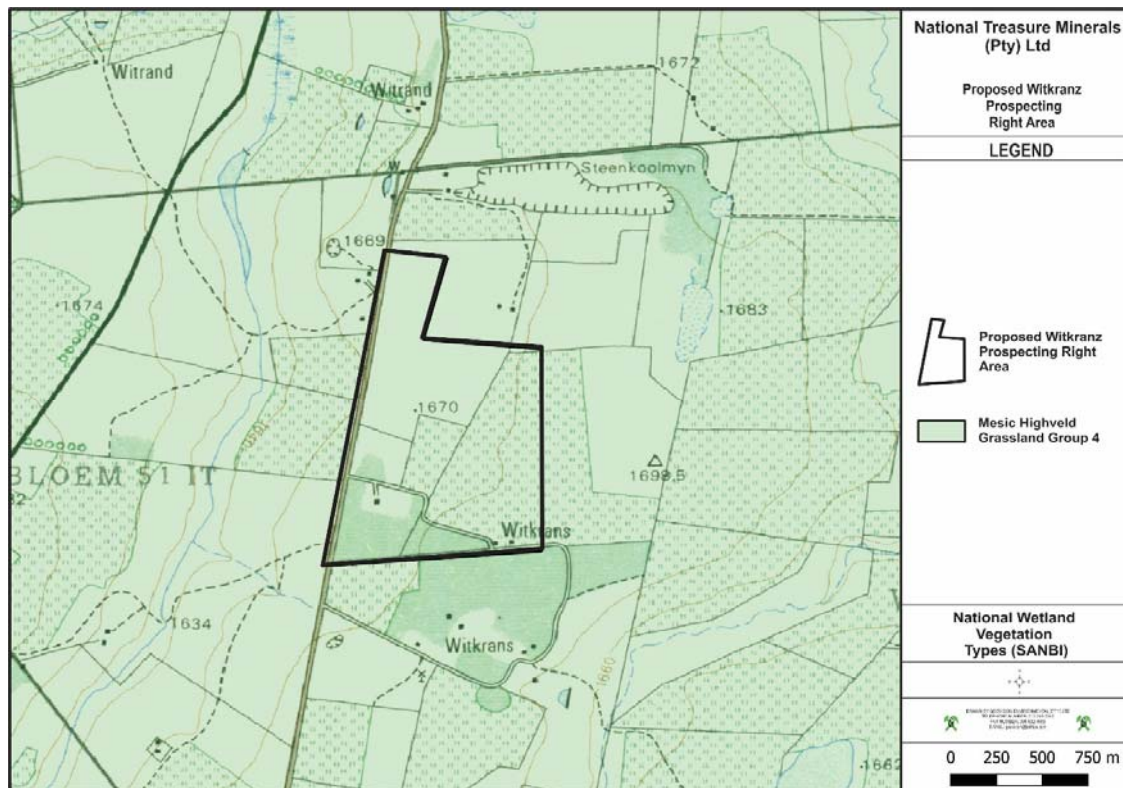
**Figure 13: National River Freshwater Ecosystem Priority Areas in the vicinity of the proposed Witkrantz prospecting right area**

According to the South African National Biodiversity Institute, GIS-based electronic application, 2018: National Biodiversity Assessment - National Wetlands Map 5, the identified wetland areas are situated in the vicinity of the following wetland types viz. depressions / pans, seepage wetlands and channelled valley bottom wetlands (Figure 14) falling into the Mesic Highveld Grassland, Group 4 and the Mesic Highveld Grassland Group 5, wetland ecosystem types (Figure 15).





**Figure 14: National Wetland Types in the vicinity of the proposed Witkrantz prospecting right area**



**Figure 15: National wetland vegetation types in vicinity of the proposed Witkrantz prospecting right area**

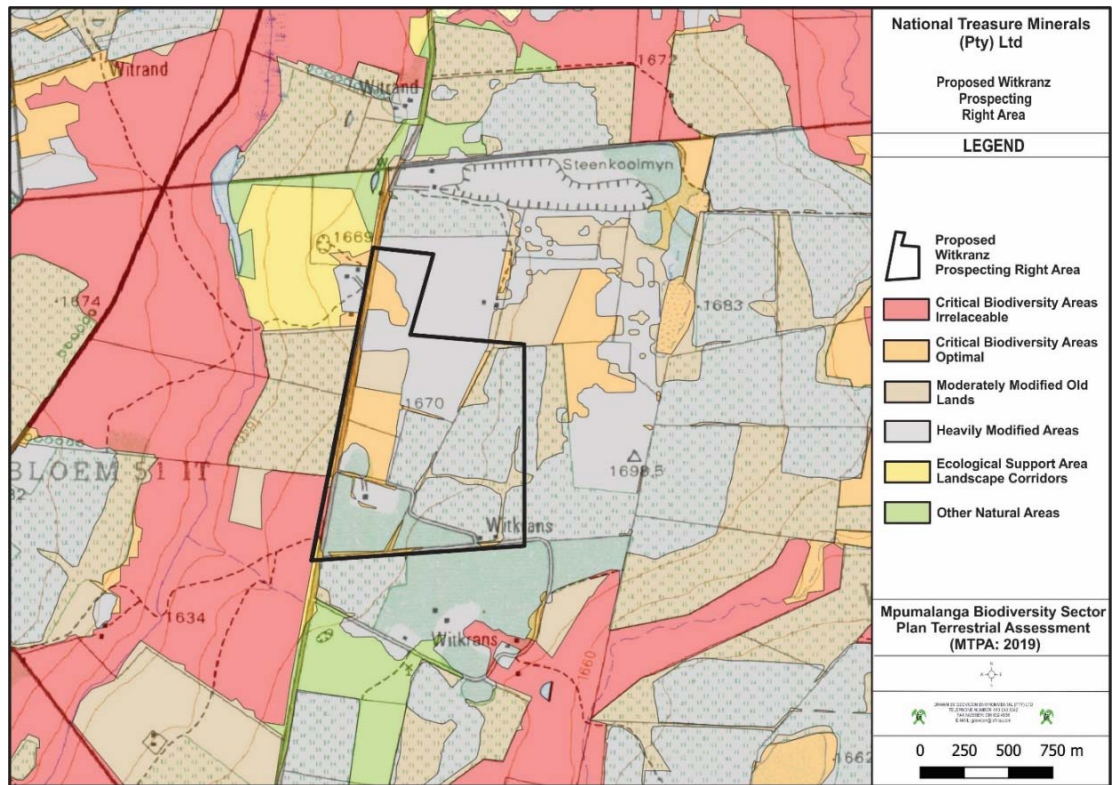


According to the Mpumalanga Biodiversity Sector Plan GIS based electronic application (MTPA, 2019), the proposed Witkranz prospecting right area is situated over terrestrial assessment categories of predominantly Heavily Modified areas. According to the MBSP Handbook (2015) **Heavily Modified Areas** described as areas that are currently transformed and where biodiversity and ecological function has been lost to the point that it is not worth considering for conservation at all. **Moderately Modified – Old lands** are areas which were modified within the last 80 years but were at some point abandoned, including old mines and old cultivated lands, collectively termed “old lands”; and “Heavily Modified”, meaning areas that are currently transformed and where biodiversity and ecological function has been lost to the point that it is not worth considering for conservation at all.

**Critical Biodiversity Areas (CBAs)** are described as all areas required to meet biodiversity pattern and process targets; Critically Endangered ecosystems, critical linkages (corridor pinch-points) to maintain connectivity; CBAs are areas of high biodiversity value that must be maintained in a natural state. Critical Biodiversity Areas are further subdivided into categories CBA irreplaceable and CBA optimal areas. The category of CBA Irreplaceable includes: (1) Areas required to meet targets and with irreplaceability values of more than 80%; (2) Critical linkages or pinch-points in the landscape that must remain natural; (3) Critically Endangered Ecosystems. The category of CBA optimal are the areas optimally located to meet both the various biodiversity targets and other criteria defined in the analysis. Although these areas are not ‘irreplaceable’ they are the most efficient land configuration to meet all biodiversity targets and design criteria. See figure x for a visual illustration.

**Ecological Support Areas (ESAs)** are described as areas that are not essential for meeting targets, but that play an important role in supporting the functioning of CBAs and that deliver important ecosystem services

The areas that surround the proposed Witkranz prospecting right area are irreplaceable critical biodiversity areas, other natural areas, heavily modified areas, moderately modified old lands and ecological support areas: landscape corridors.

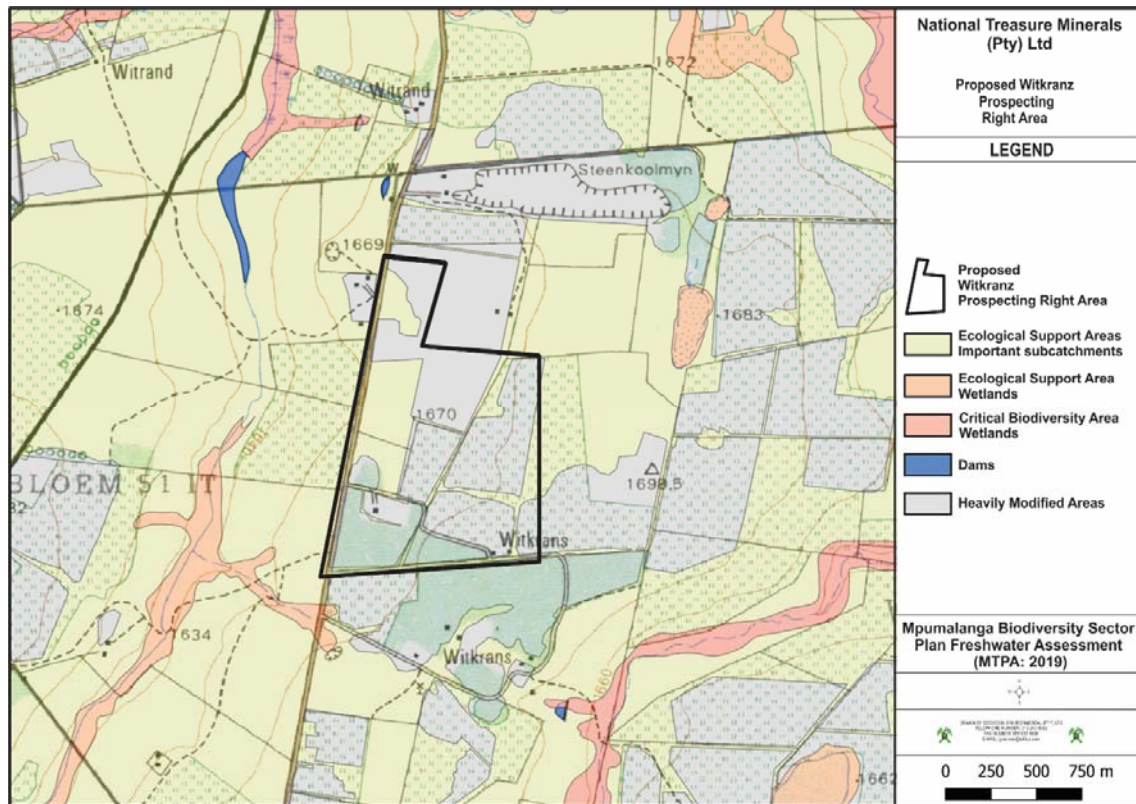


**Figure 16: Mpumalanga Biodiversity Sector Plan Terrestrial Assessment for the proposed Witkrantz prospecting area**

According to the Mpumalanga Biodiversity Sector Plan GIS -based electronic application the proposed Witkrantz prospecting area is situated over the following freshwater assessment categories:

The proposed Witkrantz prospecting area is primarily situated over freshwater assessment categories of heavily modified areas and ecological support areas: important sub catchments. **Heavily modified areas** are described as areas in which significant or complete loss of natural habitat and ecological function has taken place due to activities such as ploughing, building of dams, hardening of surfaces, open-cast mining, cultivation, and so on. **Ecological Support Areas Important sub -catchments** are described as sub-catchments that either contain river FEPAs and/or Fish Support Areas.

The areas that surround the boundary of the proposed Witkrantz prospecting area are underlain by mostly heavily modified areas, ecological support area important sub catchments, ecological support area wetlands, dams and critical biodiversity area wetlands



**Figure 17: Mpumalanga Biodiversity Sector Plan Freshwater Assessment for the proposed Witkrantz prospecting right area**

### **5.2.9 Air Quality**

Potentially air pollution from human activities may arise as a result of particulates entering the atmosphere. The sources of air pollution from human activities comprise of three broad categories i.e., stationary sources (agriculture, mining, quarrying, manufacturing, mineral products, industries and power generation), community sources (homes or buildings, municipal waste and sewage sludge incinerators, fireplaces, cooking facilities, laundry services and cleaning plants) and mobile sources combustion-engine vehicles and fugitive emissions from vehicle traffic). Air pollutants are generally classified into suspended particulate matter (dust, fumes, mists and smokes), gaseous pollutants (gases and vapours) and odours.

Assessment of the proposed prospecting right area has determined that all three categories of air pollution sources are found at the proposed area.

#### **5.2.10. Noise**

The proposed project area is predominantly a farming area. Noise from the area is mainly from farming activities with use of associated infrastructure and land use activities. Potential noise sources from the area may therefore be emanating from the following sources i.e.: roads and surrounding land uses.

#### **5.2.11. Socio-Economic Status**

Chief Albert Luthuli Local Municipality is located within the Gert Sibande district, Mpumalanga. The municipality boasts both mining and agricultural sectors that contribute significantly to the local, provincial and national GDP.

##### **5.2.11.1. Population density, growth and location**

The mid-year population estimates for 2015 for Mpumalanga Province is estimated at 4 283 900 (7.8% of the total national population) and has remained steady in the period between 2002 and 2015 (Stats SA, Statistics release P0 302, 2016). The population figure for Gert Sibande District was 1 308 129 (Census 2011) and new statistics released by Statistics SA ([www.localgovernment.co.za](http://www.localgovernment.co.za)) for 2016 estimate the district's population at 1 445 624.

The Chief Albert Luthuli Local Municipality population was 395 466 in 2011 and increased to 455 228 in 2016 (Stats SA, [www.localgovernment.co.za](http://www.localgovernment.co.za)), thus comprising 30.5% of the district. The number of households also increased from 119 874 to 150 420 during this same period. However, the average household size decreased from 3.2% to 3%.

##### **5.2.11.2. Major economic activities and sources of employment**

Mining in the Chief Albert Luthuli Local Municipality is the highest contributor to both economic growth and job creation. Given the abundance of coal reserves in Mpumalanga (and being the key mineral within Chief Albert Luthuli Local Municipality); the local space is likely to benefit from the resources abundantly found within the locality; at the expense of agriculture.

The Economy of the municipality is driven by the Mining sector which contributed 50% in 2009 followed by electricity at 12.1% and Finance at 10.8%. Agriculture and manufacturing don't seem to be performing well within the local space.

## **SECTION SIX**

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### **ENVIRONMENTAL IMPACT ASSESSMENT**

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## **6. ENVIRONMENTAL IMPACT ASSESSMENT**

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### **6.1. ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOLLOWED**

#### **6.1.1. Approach to Environmental Impact Assessment**

**The term 'environment' is used in the broadest sense in an EIA. It covers the physical, biological, social, economic, cultural, historical, institutional and political environments.**

An Environmental Impact Assessment is a good planning tool. It identifies the environmental consequences of a proposed project from the beginning and helps to ensure that the project, over its life cycle, will be environmentally acceptable and integrated into the surrounding environment in a sustainable way.

#### **6.1.2. Environmental Impact Assessment Process Followed**

Under Section 24 of the National Environmental Management Act (NEMA), the Minister promulgated the regulations pertaining to environmental impact assessments (EIA Regulations, 2014) under Government Notice No. 326 in Government Gazette 38282 of 4 December 2014. These EIA regulations repealed the 2010 EIA regulations and therefore any process relating to environmental authorisations must be undertaken under the EIA Regulations, 2014.

Chapter 4 of the EIA Regulations, 2014 deals with the provisions for application for environmental authorisation. In view of the above, National Treasure Minerals (Pty) Limited is obliged to comply with provisions of Chapter 4 for the intended environmental authorisation application for the activities (listed activities) within the proposed project.

Part 2 of chapter 4 of the EIA Regulations, 2014 contemplate process to be undertaken for the application for environmental authorisation for the proposed project, which is the BAR process. The process to be followed is describe below.

##### **6.1.2.1. Pre-application consultation with the Competent Authority**

In terms of section 24D (1) of the National Environmental Management Act, 1998 (Act 107 of 1998), the Minister responsible for mineral resources is the competent authority for environmental matters relating to mining and associated activities. In view of the above, the application for the environmental authorisation for the proposed project was submitted to the Department of Mineral Resources and Energy (DMRE), Mpumalanga Regional Office for their consideration and decision making.

##### **6.1.2.2. BAR Phase**

In compliance with Regulation 19 of the EIA Regulations, 2014, the BAR and EMPr will be submitted to the competent authority within 90 days after the acknowledgement of the environmental authorisation application.

As part of the public participation, the draft BAR and EMPr is made available to the competent authority, potential and registered interested and affected parties for their comment for a period of 30 days during the EIA phase.

### 6.1.2.3. Information Gathering

Environmental baseline data has been obtained via desktop studies, pertaining to surface water, geohydrological data, topographical analyses, soil surveys, vegetation surveys, wetland surveys and geological conditions. The data accumulated and analysed is sufficient to gain a baseline indication of the present state of the environment. The use of this baseline study for impact assessments is thus justified and reliable conclusions could be made.

### 6.1.2.4. Decision on the BAR application

In compliance with Regulation 20 of the EIA Regulations, 2014, the competent authority will within 107 days of receipt of the BAR and EMPr grant or refuse the environmental authorisation.

## 6.2. ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

The following prediction and evaluation of impacts is based on the proposed Witkranz prospecting area and associated activities.

The evaluation distinguishes between significantly adverse and beneficial impacts and allocates significance against national regulations, standards and quality objectives governing:

- Health & Safety;
- Protection of Environmentally Sensitive Areas;
- Land use; and
- Pollution levels.

Irreversible impacts are also identified. See Table 15 for the results.

The significance of the impacts is determined through the consideration of the following criteria:

Probability	: likelihood of the impact occurring
Area (Extent)	: the extent over which the impact will be experienced.
Duration	: the period over which the impact will be experienced.
Intensity	: the degree to which the impact affects the health and welfare of humans and the environment (includes the consideration of unknown risks, reversibility of the impact, violation of laws, precedents for future actions and cumulative effects).

**Table 14: The above criteria are expressed for each impact in tabular form according to the following definitions:**

Probability	Definition
Low	There is a slight possibility (0 – 30%) that the impact will occur.
Medium	There is a 30 –70% possibility that the impact will occur.
High	The impact is definitely expected to occur (70% +) or is already occurring.
Area (Extent)	Definition
Small	0 – 40 ha
Medium	40 – 200 ha
Large	200 + ha
Duration	Definition
Short	0 – 5 years
Medium	5 – 50 years
Long	51 – 200 years

Permanent	200 + years
Intensity	Definition
Low	<p>Does not contravene any laws.</p> <p>Is within environmental standards or objectives.</p> <p>Will not constitute a precedent for future actions.</p> <p>Is reversible.</p> <p>Will have a slight impact on the health and welfare of humans or the environment.</p>
Medium	<p>Does not contravene any laws.</p> <p>Will not constitute a precedent for future actions.</p> <p>Is not within environmental standards or objectives.</p> <p>Is not irreversible.</p> <p>Will have a moderate impact on the health and welfare of humans or the environment.</p>
High	<p>Contravene laws.</p> <p>May constitute a precedent for future actions.</p> <p>Is not within environmental standards or objectives.</p> <p>Is irreversible.</p> <p>Will have a significant impact on the health and welfare of humans or the environment.</p>
Significance and Risk Category	Definition
Negligible	The impact/risk is insubstantial and does not require management
Low	The impact/risk is of little importance, but requires management
Medium	The impact/risk is important; management is required to reduce negative impacts to acceptable levels
High	The impact/risk is of great importance, negative impacts could render options or the entire project unacceptable if they cannot be reduced or counteracted by significantly positive impacts, and management of these impacts is essential
Positive (No risk identified)	The impact, although having no significant negative impacts, may in fact contribute to environmental or economical health



**6.3. RESULTS OF THE ENVIRONMENTAL IMPACT ASSESSMENT**

**6.3.1. Assessment of the Witkranz prospecting area impacts/risks**

**Table 15: Results of the Environmental Impact Assessment for Witkranz prospecting area.**

6.3.1.1. Construction Phase

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES																				
		E	P	D	I	S																					
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>																											
<b>Site Establishment: Establishment of the access (tracks) to the prospecting site, Establishment of the campsite, Site physical surveying and pegging of drilling sites</b>																											
<p>The establishment of access, campsite and the surveying with pegging of the drilling sites may result in the stripping of soils if the site establishment of not properly conducted. This may result in the loss of soils and erosion that may render the area unusable.</p> <p>During site establishment, machinery and vehicles used for the prospecting operation may result in hydrocarbon leakages, which may result in the contamination of the soils within the access tracks, campsite and drilling sites.</p>	Soil/Land capability	<table border="1"> <tr> <td colspan="5">Without mitigation</td> </tr> <tr> <td>S</td> <td>L</td> <td>S</td> <td>M</td> <td>M</td> </tr> <tr> <td colspan="5">With mitigation</td> </tr> <tr> <td>S</td> <td>L</td> <td>S</td> <td>L</td> <td>L</td> </tr> </table>					Without mitigation					S	L	S	M	M	With mitigation					S	L	S	L	L	<p>Establishment of the site will be undertaken according to the prospecting method statement.</p> <p>No soil stripping will be allowed during site establishment.</p> <p>Ensure minimal disturbance of soil when conducting geophysical surveys and geological mapping (if necessary).</p> <p>Any area that may result into the disturbance of the soils must be rehabilitated immediately on discovery.</p> <p>Machinery to be used for the operation will be of good working conditions. Any hydrocarbon spill from the site establishment will be remediated as soon as possible.</p>
Without mitigation																											
S	L	S	M	M																							
With mitigation																											
S	L	S	L	L																							

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>							
<p>Current land use over the area to be used for site establishment will cease completely. This may have an impact on the land owners' livelihood should they not be able to use the land.</p> <p>Drilling activities may infringe the livelihood and operations of activities occurring within and immediately adjacent the prospecting right area.</p>	Land use	Without mitigation					<p>Use sites that are unused and that are in the degraded state for the proposed development. This will be done in agreement with the land owner. The siting of the boreholes will be conducted to ensure that rocky ridges, sensitive grass lands, indigenous trees and shrubs, sites of geological importance and farmlands actively used for crop farming are avoided.</p> <p>Buffer zones will be instituted around farm dwellers immediately and adjacent to the prospecting areas. No prospecting activities will be undertaken within the instituted buffer zones.</p>
		S	M	S	M	M	
With mitigation							
S	L	S	L	L			
<p>The establishment of the site (access, campsite and drilling sites) may result in the removal of vegetation cover if the establishment is not done correctly.</p> <p>This may render the land unusable to the land owners after completion of the area.</p>	Natural vegetation	Without mitigation					<p>Use sites with most disturbed vegetation cover for the development.</p> <p>No strip of topsoil and vegetation will be allowed during site establishment.</p> <p>Ensure minimal disturbance of vegetation when conducting geophysical surveys and geological mapping.</p> <p>Any area that may result into the disturbance of the vegetation cover must be rehabilitated immediately on discovery.</p> <p>Pictures of possible plant species that may be present in the prospecting right area will be made available to the drilling crew for easy identification and avoidance.</p>
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>							
							No trees or shrubs will be felled or damaged for the purpose of obtaining firewood.
<p>Animal burrows and habitats remaining within the proposed development site may be destroyed during construction. This may result in the migration of remaining animal life away from the affected areas.</p> <p>Poaching of wild animals and livestock by the labourers will result in the loss of wild live and loss of livestock to the land owner.</p>	Animal Life	Without mitigation					<p>Establishment of the site will be undertaken according to the prospecting method statement.</p> <p>No soil stripping will be allowed during site establishment.</p> <p>Any area that may result into the disturbance of the soils must be rehabilitated immediately on discovery.</p> <p>Use sites with most degraded environment for the site development.</p> <p>Poaching will be prohibited at the prospecting site.</p> <p>Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no animal burrows and habitats. If any burrows or habitat exist, the location of the proposed boreholes must be changed.</p>
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
<p>Exposure of soils during construction by the stripping of vegetation and soils may cause erosion, which may lead to increased silt loads in surface water runoff. This may result in the contamination of the clean water environment.</p>	Surface and Ground Water	Without mitigation					<p>Site establishment will not be undertaken within sensitive landscapes. These areas will be avoided. A distance of 100 meters will be created between the sites and the sensitive landscapes. The</p>
		S	L	S	M	M	
		With mitigation					

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>							
Waste generated from the site may result in the contamination of surface and ground water should not management of such waste be undertaken.		S	L	S	L	L	<p>applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands</p> <p>Avoid stripping of areas within the construction sites.</p> <p>Rehabilitate areas that may have been mistakenly stripped.</p> <p>Storm water upslope of the campsite and drill sites should be diverted around these areas.</p> <p>Proper waste management facilities will be put in place at the campsite and drilling site.</p> <p>Any hydrocarbon spill from the site establishment will be remediated as soon as possible.</p>
Construction activities during the establishment of the site will include material loading and hauling. These activities will result in the mobilisation of particulates that will migrate away from the site to the nearby local residents. This will be a nuisance to the communities and will result in aesthetic impacts associated with fugitive dust emissions. On-site dust fall may have health and nuisance implications to employees at the existing offices.	Air Quality	Without mitigation					Ensure that source specific management measures for Witkranz prospecting area are complied with.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
	Noise	Without mitigation					

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>							
The noise level generated from the construction activities may exceed the SANS 10103 Levels for Residential areas and may exceed the maximum rating levels for ambient noise indoors. This may have an impact in the surrounding residents and employees using/delivering the machinery.		S	L	S	L	L	Ensure that proper management measures as well as technical changes are undertaken to reduce the impacts on surrounding residents and employees. This include ensuring that less noisy equipment is used, that equipment is kept in good working order and that the equipment must be fitted with correct and appropriate noise abatement measures and where possible use white-noise generators instead of tonal reverse alarms on heavy vehicles operating on roads.
		Without mitigation					
		S	L	S	L	N	
The activities undertaken during construction and associated infrastructure will be visible from the nearby roads and properties. However, due to the undulating topography, visibility for the most part will most probably be restricted to short distances.	Visual Aspects	Without mitigation					Inform the land owner on the type of machinery and equipment to be used at the prospecting site.  Ensure that lighting is conducted in manner that will reduce the impacts on visual aspects at night times.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
The site may be located in close proximity to a heritage site and may result in the destruction of the identified heritage site.	Sites of Archaeological and Cultural Importance	Without mitigation					The establishment of the construction infrastructure complex will be such that the development is always away from the any heritage sites.
		S	M	S	H	H	
		With mitigation					

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>PRE-CONSTRUCTION AND CONSTRUCTION PHASES</b>							
		S	L	S	L	L	<p>A buffer of more than fifty meters will be created between the grave yards and the proposed site development.</p> <p>A management plan will be drafted for the sustainable preservation of the grave yard should graveyards be identified on site.</p> <p>Any grave site must have access for descendants.</p>
<p>The commencement of the proposed area may result in an influx of 'outsiders' seeking jobs, which may be caused by increase in local unemployment levels. This may result in the have potential increase in crime. It must however be noted that prospecting activities would unlikely attract job seeker due to its small nature of its scale.</p>	<p>Socio economic aspects</p>	Without mitigation					<p>Recruitment will not be undertaken on site.</p>
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	

6.3.1.2. Operational Phase

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
<b>Drilling and rehabilitation of the exploration boreholes</b>							
Topsoil removal, storage and replacement during the excavation of the sumps will result. This will result in the disruption of the soils profile.	Soils	Without mitigation					Ensure that topsoil is properly stored, away from the streams and drainage areas. The soils must be used for the backfilling and rehabilitation of the sumps. The rehabilitated sump must be seeded with recommended seed mix.
		S	M	S	L	L	
		With mitigation					
		S	L	S	L	N	
The use of vehicles during the siting, pegging and drilling of the exploration boreholes may result in the spillages of hydrocarbon liquids from the vehicles and machinery. This will result in the contamination of the vegetation cover and soils. The material removed from the drilling exercises will contain carbonaceous material, which has a potential for pollution should it be allowed stay for a prolonged period at the drilling site. The above material, if not properly managed, may result in the contamination of the surrounding soils and vegetation cover, which may render the land not usable after the backfilling operation.	Natural Vegetation and Soils	Without mitigation					Ensure that the drilling of the exploration boreholes is done in such a manner that the environment is protected from probable spillages and contamination by carbonaceous material. All boreholes and sumps will be rehabilitated to pre-drilling conditions. Tarpaulins will be placed on the ground to prevent oil, grease, hydraulic fluid and diesel spills during emergency repairs. All oil spills will be remedied using approved methodologies. The contaminated soils will be removed and disposed of at a licensed waste disposal facility.
		S	M	S	M	M	
		With mitigation					
		S	L	S	L	L	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
<p>During drilling activities, veld fires can manifest especially during the winter months from the drilling sites and their campsite. If not controlled, the fires can destroy large areas of veld and could result in the loss of vegetation to landowners and surrounding land owners.</p>							<p>Pictures of possible plant species that may be present in the prospecting right area will be made available to the drilling crew for easy identification and avoidance.</p> <p>All waste generated from the drilling sites and the campsite will be collected in proper receptacles and removed to registered disposal facilities e.g., sewage treatment plant, solid waste disposal site or hydrocarbon recycling or treatment facilities.</p> <p>Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no protected and/or critical natural vegetation. If any protected and/or critical natural vegetation occurs, the location of the proposed boreholes must be changed.</p> <p>No trees or shrubs will be felled or damaged for the purpose of obtaining firewood</p> <p>The outbreak of any uncontrolled fire shall be reported to the site manager immediately and the necessary steps shall be taken to control and extinguish the fire.</p> <p>Smoking shall be prohibited in the vicinity of flammable substances.</p>



NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
Animal burrows and habitats will be destroyed by the preparation of the backfilling sites. This will further result in the migration of animals away from these areas of disturbance. It must however be noted that no significant amount of animal life exists due to the agricultural activities currently undertaken at the proposed prospecting sites.	Animal Life	Without mitigation					<p>The rehabilitation of the disturbed areas must be conducted such that the rehabilitated areas will encourage the migration of animals back into the rehabilitated areas.</p> <p>Poaching of wild animals and livestock will be prohibited.</p> <p>Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no animal burrows and habitats. If any burrows or habitat exist, the location of the proposed boreholes must be changed</p>
		S	L	S	L	L	
		Without mitigation					
		S	L	S	L	N	
The drilling operations may result in the generation of surface water runoff contaminated with drilling muds and cuttings should spillages occur. The sedimentation and possible contamination with carbonaceous material will have negative impacts on the surrounding clean water environment. These will cause an increase in the turbidity and will decrease acidity of the water in the streams, which will affect the aquatic habitat of the wetland, hence important habitats may be lost.	Surface Water	Without mitigation					<p>No prospecting operations will be undertaken within 100 metres from the nearby steams and wetland areas. The applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands</p> <p>The sumps will be excavated for the collection mud and excess water from the drilling sites. The sump will be sized such that it will be able to contain the water and mud that will be generated during the prospecting operation. Storm water generated around the drilling site will be diverted away to the clean water environment. No concrete mixing and vehicle maintenance will be allowed on site. All hydrocarbons will be stored on protected storage areas away from the streams.</p>
		S	L	S	M	L	
		With mitigation					
		S	L	S	L	L	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
The prospecting operations will require the drilling of boreholes. The boreholes may result in the drawdown, which may affect the yield to the surrounding groundwater users. Material used for backfilling may leach pollutants that will result in the pollution of the surrounding groundwater regime. This may even spread beyond the backfilling site via plume migration.	Groundwater	Without mitigation					Ensure that the land owners' borehole yield is observed during the drilling operation. Should it be proven that the operation is indeed affecting the quantity and quality of groundwater available to users and surrounding water resources, the affected parties must be compensated.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
The prospecting operation will require vehicular movement. This will result in the generation of dust by movement of vehicles and due to blowing winds. Vehicles and machinery will also generate diesel or petrol fumes. Generated dust will migrate towards the predominant wind direction and may settle on surrounding properties including nearby vegetation.	Air Quality	Without mitigation					Dust suppression must be conducted during the operational phase of the area.  Correct speed will be maintained at the proposed area site.  Vehicle maintenance must be conducted regularly to avoid excessive diesel fumes.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
Noise generated from prospecting operations activities may add to the current noise levels. This may have impacts on surrounding property owners and occupiers.	Noise	Without mitigation					Ensure that proper management measures as well as technical changes are undertaken to reduce the impacts on surrounding residents and employees. This include ensuring that less noisy equipment is use, that equipment is kept in good working order and that the equipment must be fitted with
		S	L	S	M	L	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
		With mitigation					correct and appropriate noise abatement measures and where possible use white-noise generators instead of tonal reverse alarms on heavy vehicles operating on roads. Correct speed will be maintained at the proposed area site. Limit operation of machinery and vehicle movement between sunrise and sunset.
		S	L	S	L	L	
The drill rigs and towers used during the drilling operations will be visible from the nearby residents and properties.	Visual Aspects	Without mitigation					Ensure that the period used for the drill rigs is optimised to ensure that the drill rigs are moved from one site to another over short periods.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
Operation may affect the day-to-day operation of the land owners hence result in direct impact on their livelihood.	Socio economic aspects	Without Mitigation					Ensure that all safety measures (EMPR) are implemented to prevent the impacts on the property owners. Ensure that negotiations on compensation are undertaken before the drilling programme can commence. This will include any other conditions that the landowner may deem necessary for the prospecting operation.
		S	L	S	L	L	
		With Mitigation					
		S	L	S	L	N	
Operation will result in the employment of locals and support on local businesses.	Socio economic aspects	Positive					The applicant will ensure that as far as possible locals will be used during the operation of the prospecting area.

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>OPERATIONAL PHASE</b>							
The drilling operation may result in the destruction of graves and any other heritage sites during operational phase of the area.	Sites of archaeological and cultural importance	Without Mitigation					<p>Locate exploration borehole more than one hundred meters from the identified heritage sites.</p> <p>Should any cultural or heritage materials be identified, these areas will be demarcated and treated as no-go areas during the prospecting activities. Detailed heritage studies would then be undertaken if it is deemed that these sites would be affected by the prospecting activities. Any finds will be reported to the nearest National Monuments office to comply with the National Heritage Resources Act (Act No 25 of 1999) and to DEA. Local museums as well as the South African Heritage Resource Agency (SAHRA) will be informed if any artefacts are uncovered in the affected area. The prospecting workforce will be made aware of the necessity of reporting any possible historical or archaeological finds to the ECO so that appropriate action can be taken. Any discovered artefacts shall not be removed under any circumstances. Any destruction of a site can only be allowed once a permit is obtained and the site has been mapped and noted. Permits shall be obtained from the South African Heritage Resources Association (SAHRA) should the proposed site affect any world heritage sites or if any heritage sites are to be destroyed or altered.</p>
		S	M	S	H	H	
		With Mitigation					
		S	S	S	L	L	

6.3.1.3. Decommissioning and Closure Phases

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>DECOMMISSIONING AND CLOSURE PHASES</b>							
<b>Decommissioning of prospecting site (Site Rehabilitation)</b>							
The removal of the campsite equipment and the rehabilitation of the drilling sites and associated access infrastructure will result in the affected soil and land use being restored. This will also result in the resumption of the use of the land since the infrastructure would have been removed.	Soils, Land Capability and Land Use	Positive impact					Ensure that rehabilitation is conducted in accordance with a rehabilitation method statement approved by the mine management. See description of the rehabilitation plan and management actions in the EMPr.  Ensure that contamination of the rehabilitate area by carbonaceous material and hydrocarbon liquids are prevented.
Positive impacts will result due to the reduction in areas of disturbance and the return of land use of the affected areas and making available an area that was covered by the campsite and drilling sites.	Land Use	Positive impact					
The use of vehicles/machinery during the rehabilitation of the exploration sites may result compaction of soils and in the spillages of	Soils and Natural Vegetation	Without mitigation					
		S	M	S	M	M	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>DECOMMISSIONING AND CLOSURE PHASES</b>							
hydrocarbon liquids from the vehicles and machinery. This will result in the contamination and destruction of the vegetation cover and soils.		With mitigation					<p>Ensure that the rehabilitation work is done in such a manner that the environment is protected from probable spillages and contamination by carbonaceous material.</p> <p>All boreholes and sumps will be rehabilitated to pre-drilling conditions.</p> <p>Tarpaulins will be placed on the ground to prevent oil, grease, hydraulic fluid and diesel spills during emergency repairs. All oil spills will be remedied using approved methodologies. The contaminated soils will be removed and disposed of at a licensed waste disposal facility.</p> <p>All waste generated from the rehabilitation sites will be collected in proper receptacles and removed to registered disposal facilities e.g., sewage treatment plant, solid waste disposal site or hydrocarbon recycling or treatment facilities.</p>
		S	L	S	L	L	
During the decommissioning and closure phases equipment will be removed, stockpiled soils will be used for rehabilitation, remaining sumps will be backfilled, levelled, topsoiled and the area re-seeded. During the process of rehabilitation surface water runoff from the rehabilitation site may have elevated silt load, which may cause pollution of the nearby water environment.	Surface Water	Without mitigation					<p>Ensure that water leaving the site do not have elevated silt load.</p> <p>Ensure that the rehabilitated areas are free draining and that water from these areas is clean.</p>
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	

NATURE OF THE IMPACT	ENVIRONMENTAL ASPECT	IMPACT ASSESSMENT					MITIGATION MEASURES
		E	P	D	I	S	
<b>DECOMMISSIONING AND CLOSURE PHASES</b>							
Rehabilitation and removal of the prospecting sites and equipment will require vehicular movement. This will result in the generation of dust by movement of vehicles and due to blowing winds. Vehicles and machinery will also be generated diesel or petrol fumes. Generated dust will migrate towards the predominant wind direction and may settle on surrounding properties including nearby vegetation.	Air Quality	Without mitigation					Dust suppression must be conducted during the decommissioning phase of the area whenever excessive dust is generated.  Correct speed will be maintained at the proposed area rehabilitation sites.  Vehicle maintenance must be conducted regularly to avoid excessive diesel fumes.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	
Noise will be generated during the removal of equipment and rehabilitation of the sites. This noise is not expected to exceed occupational noise limits and will be short lived.	Noise	Without mitigation					Where necessary, provide employees with ear plugs and employees must be instructed to use the ear plugs.  Ensure that equipment is well maintained and fitted with the correct and appropriate noise abatement measures.
		S	L	S	L	L	
		With mitigation					
		S	L	S	L	N	

#### **6.4. SUMMARY OF SPECIALIST REPORTS**

For this basic assessment draft report, only the desktop study was conducted hence no specialist reports are summarized.

#### **6.5. ENVIRONMENTAL IMPACT STATEMENT**

National Treasure Minerals (Pty) Limited has applied for a prospecting right over the Witkranz prospecting area. The prospecting operation will involve the systematic removal of coal and pseudocoal. The prospecting operation will involve the exploration for the above-mentioned minerals within the prospecting right area. Diamond core drilling will be used for the exploration and a campsite will be established on site. Each drilling site will have an access route in the form of a track and a sump for the collection of waste water generated during the drilling operation.

##### **6.5.1. Description of affected environment**

The proposed project is situated within the Chief Albert Luthuli Local Municipality situated in an area characterised by elevated undulating plateau with streams such as the Boesmanspruit. A variety of soil types were identified within the project area, which include recharge, interflow and responsive soils. The land uses over the project area correspond to the soils found in the area and include mainly agriculture and grazing.

##### **6.5.2. Summary of key findings of the environmental impact assessment**

During the proposed prospecting operation impacts may occur on soils, natural vegetation, surface water, groundwater, sensitive landscapes, air quality, noise, visual aspects, and sites of archaeological and cultural importance should the prospecting method statement not be adhered to. Alternatives considered for the location campsite and drilling sites has shown that the selected locations would be the most favourable. National Treasure Minerals (Pty) Limited will undertake measures to ensure that the identified impacts are minimised. Assessment of the impacts with the proposed mitigation measures has shown the significance of the impacts on all affected environmental aspects to be reduced from to low and negligible significance.

Land use will not change. Several landowners and land occupiers within the proposed area may be affected although on a temporary basis due to the need to access the sites and establishment and use of the campsite. Measures such as safety along the roads and dust suppression will be undertaken to ensure that the impacts on the land owners and land occupiers are minimised.

Assessment of the vegetation within the footprint (proposed boreholes) of the development area has shown limited presence of natural vegetation.

Storm water runoff from the dirty water areas of the drilling sites, its associated surface infrastructure (campsite) may have a detrimental impact on the surrounding water environment should this water be released to the environment. In order to prevent the occurrence of the above-mentioned impacts, dirty water collection sump will be used to collect all dirty water from the drilling site. The water collected from the sump will re-used, evaporated and the sump will be rehabilitated once the drilling is finished. Sediments will be created from the site during the construction, operational and decommissioning phase, which may impact negatively on the surrounding water environment, will be treated should they contain hydrocarbon waste.

All workers will be housed in the campsite to be established on site. The employees will be given strict instruction not to undertake activities that will affect the environment and that may have an impact on



the landowner. Waste generated from the site will be collected in proper receptacle and disposed of in registered waste disposal sites.

### **6.5.3. Final Master Layout Plan**

The final maps showing the layouts of the proposed area will be submitted to the DMRE on granting of the prospecting project. The map will be developed to superimpose the proposed prospecting area together and associated infrastructure with the environmental sensitivities within the proposed area site, however a proposed draft layout plan is attached as **Appendix D**.

### **6.6. ASPECTS FOR INCLUSION AS CONDITIONS OF THE ENVIRONMENTAL AUTHORISATION**

In authorising the proposed Witkranz prospecting project; the following conditions should form part of the environmental authorisation:

- National Treasure Minerals (Pty) Limited may not alter the location of any of the project activities included in this environmental impact assessment without obtaining the required environmental authorisation to do so under NEMA.
- National Treasure Minerals (Pty) Limited will not undertake any new activity/ies that was not part of this environmental impact assessment and that will trigger a need for an environmental authorisation without proper authorisation.
- The EMPr must be implemented fully at all stages of the proposed project
- National Treasure Minerals (Pty) Limited must limit night-time operations. This would be relevant for all work taking place at night within 150 m from the closest receptors in this community. If night work is conducted, such must be conducted in agreement with the land owners and affected parties (lawful land occupier and labours).

### **6.7. DESCRIPTION OF ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE**

The EIA Regulations, 2014 outline specific requirements that a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures must be provided in the BAR.

The assessments undertaken are based on conservative methodologies and these methods attempts to determine potential negative impacts that could occur on the affected environmental aspects. These impacts may however be of smaller magnitude than predicted, while benefits could be of a larger extent than predicted.

This section outlines various limitations to the specialist studies that have been undertaken and indicates, where appropriate, the adequacy of predictive methods used for the assessment. This has been done to provide the authorities and interested and affected parties with an understanding of how much confidence can be placed in this impact assessment.

The impact assessment has investigated the potential impact on key environmental media relating to the specific environmental setting for the site. A number of desktop assessment were undertaken and result thereof and are presented in this report.

The information provided in this BAR and EMPr is therefore considered sufficient for decision-making purposes.

## **6.8. REASONED OPINION AS TO WHETHER THE PROPOSED PROJECT SHOULD OR SHOULD NOT CONTINUE**

### **6.8.1. Reason why the activity should be authorised or not**

According to the impact assessment undertaken for the proposed area, the key impacts of the area are on soils, natural vegetation and land owners/occupiers.

The area will also have positive impacts due to the employment to be created although it will be for a short term.

The public will also be requested for their comments. All comments to be received during Public Participation Process will be included in the final BAR and EMPr. These comments will be addressed the as far as possible to the satisfaction of the interested and affected parties.

The management of the impacts identified in the impact assessment for all phases of the proposed area will be undertaken through a range of programmes and plans contained in the EMPr. In consideration of the programmes and plans contained within the EMPr, layouts and method statements compiled for the area, which is assumed will be effectively implemented, there will be significant reduction in the significance of potential impacts.

Based on the above, it is; therefore, the opinion of the EAP that the activity should be authorised.

### **6.8.2. Conditions that must be included in the authorisation**

See section 6.6 above.

## **6.9. PERIOD FOR WHICH THE ENVIRONMENTAL AUTHORISATION**

Based on the prospecting method statement, the environmental authorisation should be given for five (5) years.

## **6.10. UNDERTAKING**

The signed undertaking will be presented to the DMRE on execution of the Witkranz prospecting project.

## **6.11. FINANCIAL PROVISION**

According to Appendix 3 of the EIA Regulations, 2014, where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts must be provided in the BAR and EMPr. In order to avoid duplication, the financial provision for the proposed area has only been provided under the relevant section of the EMPr.

## **6.12. OTHER INFORMATION REQUIRED BY THE COMPETENT AUTHORITY**

Aside from the BAR and EMPr no other information has been requested by the competent authority.

## **6.13. OTHER MATTERS REQUIRED IN TERMS OF SECTION 24 (4) (A) AND (B) OF THE ACT**

Any matter required in terms of the above section of the Act will be complied together with National Treasure Minerals (Pty) Limited.

**PART B**

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**ENVIRONMENTAL MANAGEMENT PROGRAMME**

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## 1. DETAILS OF THE EAP

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EAP: Mr. Ornassis Tshepo Shakwane

Professional registration:

SACNASP: 117080

EAPASA: 2019/1763

IAIA Membership No.: 3847

Company: Geovicon Environmental (Pty) Limited

Postal Address:

P.O. Box 4050

MIDDELBURG, 1050

Tel: (013) 243 5842

Fax: (086) 632 4936

Cell No.: 082 498 1847

Email: [tshepo@geovicon.co.za](mailto:tshepo@geovicon.co.za)

### 1.1. EXPERTISE OF THE EAP WHO PREPARED THE BAR AND EMPR

Geovicon Environmental (Pty) Limited is a geological and environmental consulting company. The company was formed during 1996, and currently has more than 20 years' experience in the geological and environmental consulting field. Geovicon Environmental (Pty) Limited has successfully completed consulting areas in the Mining sector (coal, coal, gold, base metal and diamond), Quarrying sector (sand, aggregate and dimension stone), Industrial sector and housing sector. Geovicon Environmental (Pty) Limited has undertaken contracts within all the provinces of South Africa, Swaziland, Botswana and Zambia. During 2001 Geovicon Environmental (Pty) Limited entered the field of mine environmental management and water monitoring.

Geovicon Environmental (Pty) Limited is a Black Economically Empowered Company with the BEE component owning 60% of the company. Geovicon Environmental (Pty) Limited has three directors i.e., O.T Shakwane, J.M. Bate and T.G Tefu.

Mr. O.T Shakwane obtained his BSc (Microbiology and Biochemistry) from the University of Durban Westville in 1994, and completed his honours degree in Microbiology in 1995. Mr O.T Shakwane has also completed short courses on environmental law and environmental impact assessment with the University of Mpumalanga's Centre for Environmental Management. He has worked with the three state departments tasked with mining and environmental management i.e., Department of Water and Sanitation (Gauteng and Mpumalanga Region), Department of Mineral Resources and Energy (Mpumalanga Region) and Department of Agriculture, Conservation and Environment (Gauteng Region). Mr. Shakwane has been in the consulting field since 2004 and has completed various areas similar to the proposed Witkranz prospecting project as an environmental assessment practitioner. Mr Shakwane is the environmental assessment practitioner for the environmental impact assessment for the proposed Witkranz prospecting project.

Over the past years Geovicon Environmental (Pty) Limited has formalised working relationships with companies that offer expertise in the following fields i.e., Geohydrology, Civil and Geotechnical

Engineering, Geotechnical Consultancy, Survey and Mine Planning and Soil & Land Use Consultancy. Geovicon Environmental (Pty) Limited is an independent consulting company, which has no interest in the outcome of the decision regarding the Witkrantz prospecting project basic assessment process.

The curriculum vitae of the EAP is attached as **Appendix E**.

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## **2. DESCRIPTION OF THE ASPECTS OF THE ACTIVITY**

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### **2.1. DATA GATHERING**

Relevant information regarding the potential of the identified Prospecting Right area will be sourced from institutions like the Council for Geoscience. This information will be analysed and interpreted through computer modelling of existing data.

The interpretation of the said data will result in compiling a literature review report. The said report will give indication as to what processes (in order of priority) to follow to complete the prospecting activities.

### **2.2. FIELD MAPPING**

The field mapping will include field surveying (to determine sensitive areas), geophysical or geomagnetic surveys and pegging of the drilling sites.

### **2.3. DETAILED SITE SURVEY AND INVESTIGATION**

Demarcation of sensitive and protected areas will be conducted by a physical survey of the proposed area by a suitability qualified person. This should be done before establishment of access to the site, caravan structure and drilling of exploration boreholes.

### **2.4. GEOPHYSICAL SURVEYS AND DATA INTERPRETATION**

Geophysical surveys will be used over the proposed prospecting site.

### **2.5. PEGGING OF DRILL SITES**

All exploration borehole sites will be staked by a suitably qualified person. The sites will thereafter be plotted on a plan drawn to an appropriate scale.

### **2.6. ESTABLISHMENT OF ACCESS**

There is a good network of both tarred and gravel roads connecting the prospecting area with surrounding towns. Existing roads to be used for the proposed area include the R36 Provincial Road, a secondary road and a number of private farm roads. Where necessary, arise for access to the drilling sites, tracks will be established as access to the drilling site. These, tracks will be established to be more than a hundred meters away from any sensitive landscapes. The tracks will also be sited away from protected areas. Vegetation clearance will be avoided during the establishment of the access roads.

### **2.7. ESTABLISHMENT OF CARAVAN SITE**

Caravans, ablution facilities (chemical toilets) and waste storage facilities will be provided for employees. Clearing of vegetation will be avoided during the establishment of the caravan site.

### **2.8. DIAMOND DRILLING FOR BOREHOLES AND SUMP CONSTRUCTION**

Geological boreholes will be drilled on a predetermined grid. During drilling of each borehole, a sump of approximately 1.0 x 1.0 x 1.0 m will be excavated for collecting of excess muds (water) from the drilling operation and for recycling of the water used for the operation of the drilling machine.

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## **2.9. TOPSOIL STORAGE SITE**

The top and sub soils removed from the sump and drilling boreholes will be stockpiled in close proximity to the sump. The sumps will be backfilled manually by spade, once drilling and sampling of boreholes is completed.

## **2.10. LOGGING AND SAMPLING OF THE CORE**

This involves the physical description of the rocks intersected by the drilling process. The interpretation of these rock descriptions will assist in establishing the general stratigraphy of the area. Sampling will be taken at the desired horizons and sent to the laboratory for analyses.

## **2.11. SITE REHABILITATION**

Concurrent rehabilitation (Plugging and reseeded) of disturbed areas will be undertaken as drilling continues.

## **2.12. FINAL REHABILITATION**

Except for farm roads, no tracks and infrastructure related to the prospecting operation will remain in place after the decommissioning phase. Where tracks have resulted in more damage, such tracks will be ripped and allowed to return to the natural state, and seeding is not done as experience has shown that the natural process returns the site to its former state within a seasonal cycle. The sumps will be rehabilitated in such a manner to return the area to as close as possible to its pre-drilling environment.

Post closure, the Prospecting Right area will consist of re-vegetated areas with vegetation cover comparable to the surrounding areas. This will be unaffected by the prospecting activities. No prospecting related infrastructure will remain on the prospecting site. The area will conform to the pre-prospecting topography. The areas affected by prospecting will be stable and erosion free.

## **2.13. AFTER CLOSURE PHASE**

The rehabilitated area will be monitored on a quarterly basis to ensure that the site returns to an acceptable state, in the event that is not happening naturally, the area will be seeded. After the decommissioning of the site and if it can be determined that the site is stable, an Environmental Authorisation for the decommissioning of the site and a closure certificate will be applied for in terms of the relevant laws.

Please note that the borehole layout can only be determined once the Prospecting Right is granted, thereafter it will be sent to the Department of Mineral Resources and Energy (DMRE).

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## **3. COMPOSITE MAP**

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The map superimposing the proposed project, its associated structures and infrastructure on the environmental sensitivities of the preferred site will be provided on approval of the EMPr.

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## **4. DESCRIPTION OF THE MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENTS**

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### **4.1. GENERAL CLOSURE PRINCIPLES AND OBJECTIVES**

The following are the closure objectives, general principles and objectives guiding closure of the Witkranz prospecting area closure planning:

- Rehabilitation of areas disturbed as a consequence of prospecting to a land capability that will support and sustain a predetermined post-closure land use;

- Removal of all infrastructure/equipment that cannot be beneficially re-used, as per agreements established, and returning the associated disturbed land to the planned final land use;
- Removal of existing contaminated material from affected areas;
- Establishment of final landforms that are stable and safe in the long run;
- Establishment and implementation of measures that meet specific closure related performance objectives;
- Monitoring and maintenance of rehabilitated areas forming part of site closure to ensure the long-term effectiveness and sustainability of measures implemented.

#### **4.2. MANAGEMENT OF ENVIRONMENTAL DAMAGE, ENVIRONMENTAL POLLUTION AND ECOLOGICAL DEGRADATION CAUSED BY THE WITKRANZ PROSPECTING AREA ACTIVITIES**

The following actions will be undertaken by National Treasure Minerals (Pty) Limited to ensure that the closure objectives are attained.

##### **4.2.1. Infrastructure Areas**

- All infrastructure and equipment used during the prospecting operation will be removed from the site.
- All haul roads that were used for access during prospecting will be allowed to re-establish to its pre-prospecting condition. Should unsatisfactory results be noted, the area will be physically rehabilitated.
- All rehabilitated areas will be maintained for a period of 2 years, where after the frequency will be reassessed. Where necessary, vegetation cover will be maintained by annual application of fertiliser.
- Maintenance with respect to erosion will be conducted on a minimum three-monthly basis if and where required.

##### **4.2.1.1. Buildings (Offices, Workshops and Stores)**

Mobile structures will be used and such structures will be removed from the sites during decommissioning of the site.

#### **4.3. POTENTIAL RISK OF ACID MINE DRAINAGE**

No potential risk of acid mine drainage.

#### **4.4. STEPS TAKEN TO INVESTIGATE, ASSESS AND EVALUATE THE IMPACTS OF THE ACID MINE DRAINAGE**

Since there is no risk of acid mine drainage, there will be no need for steps to be taken to investigate, assess and evaluate the impacts of acid mine drainage.

#### **4.5. ENGINEERING AND DESIGNS SOLUTIONS TO BE IMPLEMENTED TO AVOID OR REMEDY ACID MINE DRAINAGE**

Since there is no risk of acid mine drainage, there will be no need for measures to remedy residual or cumulative impacts from acid mine drainage.

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#### **4.6. MEASURES TO REMEDY RESIDUAL OR CUMULATIVE IMPACTS FROM ACID MINE DRAINAGE**

Since there is no risk of acid mine drainage, there will be no need for measures to remedy residual or cumulative impacts from acid mine drainage.

#### **4.7. VOLUMES AND RATES OF WATER USE REQUIRED FOR THE PROPOSED PROJECT**

Since there is no risk of acid mine drainage, this section will not be applicable.

#### **4.8 WATER USE LICENCE APPLICATION**

No water use activities will be undertaken during the proposed prospecting operation; hence no water use licence will be applied for.



5. ENVIRONMENTAL MANAGEMENT PROGRAMME

Table 16: Environmental Management Programme for the proposed Witkranz prospecting project.

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Interventions	Actions And	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
<b>CONSTRUCTION PHASE</b>											
<b>Establishment of access, to prospecting sites, establishment of the campsite, physical surveying of the site and pegging of drilling boreholes</b>											
Loss of soils, erosion of the soils and impacts on land owner's livelihood.	Soils, Land Use and Land Capability.	To ensure that the activities in the development of the prospecting sites and associated infrastructure do not have detrimental impacts on the soils, land use and land capability.	Ensure that the establishment of the prospecting sites is undertaken in accordance with the approved EMPr.	<p>Establishment of the site will be undertaken according to the prospecting method statement.</p> <p>Buffer zones will be instituted around farm dwellers immediately and adjacent to the prospecting areas. No prospecting activities will be undertaken within the instituted buffer zones.</p> <p>No soil stripping will be allowed during site establishment.</p> <p>Should it be necessary to conduct geophysical surveys and geological mapping, ensure minimal disturbance of soil.</p> <p>Any area that may result into the disturbance of the soils must be rehabilitated immediately on discovery.</p> <p>Machinery to be used for the operation will be of good working conditions. Any hydrocarbon spill from the site establishment will be remediated as soon as possible.</p> <p>Use sites that are unused and that are in the degraded state for the proposed development. This must be done in agreement with the land owner. The sitting of the boreholes must be conducted such that ensure that rocky ridges, sensitive grass lands, indigenous trees and shrubs, sites of geological importance and farmlands</p>	Appointed contractor and site manager.	Visual monitoring through inspections.	Environmental Control Officer (ECO) during construction.	During construction phase.			
					Appointed contractor.	Visual monitoring and inspections	ECO monthly.	During construction phase.			
					Appointed contractor.	Visual monitoring and inspections.	ECO monthly.	During construction phase.			
					Appointed contractor and the applicant site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.			
					Appointed contractor.	Visual monitoring and inspections	ECO monthly.	During construction phase.			
					Appointed contractor.	Undertake regular inspections.	ECO monthly.	During construction phase.			

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						actively used for crop farming are avoided.				
Loss of natural vegetation in the affected areas.	Flora.	To ensure that the establishment of the prospecting site and associated infrastructure/equipment do not have detrimental impact on the area's flora.	The management of the impact will comply with the company's biodiversity management plan.  Ensure that protected species should they be identified are not destroyed.		Use sites with most disturbed vegetation cover for the development. Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no protected and/or critical natural vegetation. If any protected and/or critical natural vegetation occurs, the location of the proposed boreholes must be changed	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	
					No strip of topsoil and vegetation will be allowed during site establishment.	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	
					Ensure minimal disturbance of vegetation when conducting geophysical surveys and geological mapping.	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	
					Any area that may result into the disturbance of the vegetation cover must be rehabilitated immediately on discovery.	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	
Migration of animal life due to disturbance caused proposed area	Animal Life	Ensure that the animal life within in the area is not affected by the proposed area	Maintenance of the current status on animal life within the area		Establishment of the site will be undertaken according to the prospecting method statement.	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	
					No soil stripping will be allowed during site establishment. Any area that may result into the disturbance of the soils must be	Appointed contractor and site manager.	Visual monitoring and inspections.	ECO monthly.	During construction phase.	

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Interventions	Actions And	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						<p>rehabilitated immediately on discovery.</p> <p>Use sites with most degraded environment for the site development.</p> <p>Poaching will be prohibited at the prospecting site. Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no animal burrows and habitats. If any burrows or habitat exist, the location of the proposed boreholes must be changed</p>		<p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p>	<p>Visual monitoring and inspections.</p> <p>Visual monitoring and inspections.</p>	<p>ECO monthly.</p> <p>ECO monthly.</p>	<p>During construction phase.</p> <p>During construction phase.</p>
Deterioration of water quality in the nearby streams and within the groundwater regime.		Surface and Ground Water.	Ensure that the establishment of the area and its associated infrastructure does not have detrimental impact on nearby stream and the groundwater regime.		<p>The quality of streams and groundwater within the site will comply with the target DWS target water quality objectives.</p> <p>Construction will be in compliance with the regulations under the GN704.</p>	<p>Site establishment will not be undertaken within sensitive landscapes. These areas will be avoided. A distance of 100 meters will be created between the sites and the sensitive landscapes. The applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands</p> <p>Avoid stripping of areas within the construction sites.</p> <p>Rehabilitate areas that may have been mistakenly stripped.</p> <p>Storm water upslope of the campsite and drill sites should be diverted around these areas.</p> <p>Proper waste management facilities will be put in place at the campsite and drilling site. Any hydrocarbon spill</p>		<p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p>	<p>Regular inspections</p> <p>Regular inspections</p> <p>Regular inspections</p> <p>Regular inspections</p> <p>Regular inspections</p>	<p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p>	<p>During construction phase.</p> <p>During construction phase</p> <p>During construction phase</p> <p>During construction phase</p> <p>During construction phase.</p>

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						from the site establishment will be remediated as soon as possible.				
Wetland destruction and loss of habitat.		Sensitive Landscapes.	Ensure that the construction activities do not have detrimental impacts on the sensitive landscapes.		Maintain the current state of the sensitive landscapes within the area (farm dams and seepage zone).	Construction activities will be limited to be more than hundred meters from the edge of the dams and seepage zone. The applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands	Appointed contractor and site manager.	Inspection to ensure compliance with the action plan will be conducted at the construction site.	ECO will conduct the inspections monthly.	Whenever construction is undertaken near the sensitive landscapes.
Air pollution through air pollutants' emissions, from the construction site.		Air quality.	Ensure that all operations during the construction phase do not result in detrimental air quality impacts.		The construction will be undertaken such that the ambient air quality does not exceed the National Air Quality Standards.	Wet suppression using will be conducted at areas with excessive dust emissions.  Traffic will be restricted to demarcated areas and traffic volumes and speeds within the construction site will be controlled.	Appointed contractor and site manager.  Appointed contractor and site manager.	Visual inspections of areas with possible dust emissions.  Regular inspections.	ECO monthly.  ECO monthly.	Throughout the construction phase.  Throughout the construction phase.
Increased noise levels.		Noise aspects.	Ensure that the noise levels emanating from the construction sites will not have detrimental effects on the mine employees and surrounding communities/land owners.		The noise levels from the construction sites will be managed and measures will be taken to ensure that noise levels are below the National Noise Control Regulations, SANS10103:2008 guidelines.	Limit the maximum speed to 60 km/h or less, subject to risk assessment. Less noisy equipment will be used, the equipment will be kept in good working order and the equipment will be fitted with correct and appropriate noise abatement measures.  Ensure that the employees are issued with earplugs and that they are instructed to use them.  Educate employees on the dangers of hearing loss due to mine machinery noise.	Appointed contractor and site manager.  Site manager.  Site manager.	Undertake site checks on speeds used.  Speed checking will be conducted.  Use of earplugs will be checked and reported.	Site manager.  Site manager checking as regularly as possible.  Site manager will check the use of the earplugs as regularly as possible.	Throughout the construction phase.  Throughout the duration of the construction phase  Throughout the duration of the construction phase.
Visual impacts on the surrounding communities and road users from the construction.		Visual aspects.	Ensure that all operations during the construction phase do not result in detrimental visual impacts on surrounding		Measures will be undertaken by the mine to ensure that the visual aspects from the site are complying with the	The land owner will be informed on the type of machinery and equipment to be used at the prospecting sites.	Applicant and site manager.	The constructed perimeter berms will be inspected for compliance	Mine Engineer on a monthly basis.	Throughout the construction phase.

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management (Impact Management Outcomes)	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
			properties, communities and road users.	relevant visual standards and objectives.		Lighting will be conducted in manner that will reduce the impacts on visual aspects at night times.	Appointed contractor.	with the design specifications. Night time inspection of the site will be undertaken.	The site manager once	During construction phase.
Damage or destruction of sites with archaeological and cultural significance.		Sites of archaeological and cultural importance.	Ensure that the construction activities do not have detrimental impacts on the heritage sites.	The construction will be undertaken in compliance with the requirements of the National Heritage Resources Act, 1999 (Act 25 of 1999) and recommendations from the specialist.	The establishment of the sites will be away from any identified grave site or heritage sites. A buffer of hundred meters will be created between the sites and the proposed camp and drilling sites.		Appointed contractor and site manager.	The site will be monitored for any damages on a regular basis.	ECO monthly	Throughout the construction phase when activities are in close proximity to the heritage sites.
Impact from the influx of job seekers and employment of farm labourers.		Socio-economic aspects.	Ensure that measures are taken to discourage influx of job seekers and employment of farm labourers.	Measures taken will be in line with the company's recruitment policies.	Recruitment will not be undertaken on site.		Appointed contractor and site manager.	Visual monitoring.	Site manager	Throughout the pre- and construction phase.
<b>OPERATIONAL PHASE</b>										
<b>Diamond Core drilling of the exploration boreholes, use of campsite and rehabilitation of the drilling sites</b>										
Soil profile disruption, contamination of soils, destruction of natural vegetation and loss of land use.		Soils, Natural Vegetation, Land Use and Land Capability.	Ensure that the operation of the drilling sites and use of campsite and rehabilitation of drilling site do not have detrimental impacts on the soils, natural vegetation and current land use.	The land use and capability of the sites where the operations will be undertaken will continue after the proposed area.	Ensure that the drilling of the exploration boreholes is done in such a manner that the environment is protected from probable spillages and contamination by carbonaceous material. Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no protected and/or critical natural vegetation. If any protected and/or critical natural vegetation occurs, the location of the proposed boreholes must be changed.		Appointed contractor and site manager.	Regular inspections	ECO monthly.	During the operational phase of the area.
					All boreholes and sumps will be rehabilitated to pre-drilling conditions.		Appointed contractor.	Regular inspections	ECO monthly.	During the operational phase of the area.

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						<p>Tarpaulins will be placed on the ground to prevent oil, grease, hydraulic fluid and diesel spills during emergency repairs. All oil spills will be remedied using approved methodologies. The contaminated soils will be removed and disposed of at a licensed waste disposal facility.</p> <p>All waste generated from the drilling sites and the campsite will be collected in proper receptacles and removed to registered disposal facilities e.g., sewage treatment plant, solid waste disposal site or hydrocarbon recycling or treatment facilities.</p> <p>No trees or shrubs will be felled or damaged for the purpose of obtaining firewood. The outbreak of any uncontrolled fire shall be reported to the site manager immediately and the necessary steps shall be taken to control and extinguish the fire. Smoking shall be prohibited in the vicinity of flammable substances.</p>	<p>Appointed contractor.</p> <p>Appointed contractor.</p> <p>Appointed contractor.</p>	<p>Regular inspections.</p> <p>Inspection of the site will be conducted.</p> <p>Inspection of the site will be conducted.</p>	<p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p>	<p>During the operational phase of the area.</p> <p>During the operational phase of the area.</p> <p>During the operational phase of the area.</p>
Migration of animal life due to disturbance caused proposed area		Animal Life	Ensure that the animal life within in the area is not affected by the proposed area	Maintenance of the current status on animal life within the area	<p>Sites will be operated according to the prospecting method statement.</p> <p>As much as possible sites with degraded environment will be used or the drilling purposes.</p> <p>Poaching will be prohibited at the prospecting site. Before the drilling activities can commence, a biodiversity specialist must do a site inspection on the proposed marked drilling sites (proposed boreholes) to assess if there are no animal burrows</p>	<p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p>	<p>Visual monitoring and inspections.</p> <p>Visual monitoring and inspections.</p> <p>Visual monitoring and inspections.</p>	<p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p>	<p>During operational phase.</p> <p>During operational phase.</p> <p>During operational phase.</p>	

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						and habitats. If any burrows or habitat exist, the location of the proposed boreholes must be changed				
	The drilling operation and use of campsite may result in the generation of surface water runoff contaminated with silt (sedimentation) and possibly hydrocarbon fluids should spillages occur.	Surface and Ground Water.	Ensure that the drilling operation does not have detrimental impacts on the surface and ground water environment.		Clean surface and ground water environment/regime will not be affected.	<p>No prospecting operations will be undertaken within 100 metres from the nearby steams and 100 meters from the nearby wetland areas. The applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands</p> <p>The sumps will be excavated for the collection mud and excess water from the drilling sites. The sump will be sized such that it will be able to contain the water and mud that will be generated during the prospecting operation.</p> <p>Storm water generated around the drilling site will be diverted away to the clean water environment. No concrete mixing and vehicle maintenance will be allowed on site. All hydrocarbons will be stored on protected storage areas away from the streams.</p> <p>Ensure that the land owners' borehole yield is observed during the drilling operation. Should it be proven that the operation is indeed affecting the quantity and quality of groundwater available to users and surrounding water resources, the affected parties must be compensated.</p> <p>Ensure minimum distance as per legislation is kept from the waste disposal site. Ensure that an experienced geologist must oversee the drilling process.</p>	<p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager.</p> <p>Appointed contractor and site manager</p>	<p>Visual monitoring and inspections.</p> <p>Visual monitoring and inspections.</p> <p>Visual monitoring and inspections.</p> <p>Regular meetings with landowners.</p> <p>Visual monitoring and inspections.</p>	<p>ECO monthly.</p> <p>ECO monthly.</p> <p>ECO monthly.</p> <p>Site manager.</p> <p>ECO monthly.</p>	<p>During operational phase.</p> <p>During operational phase.</p> <p>During operational phase.</p> <p>During operational phase.</p> <p>During operational phase.</p>

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management (Impact Management Outcomes)	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
Generation of dust and fuel fumes by vehicular movement.		Air quality.	Ensure that the air quality in the vicinity of the prospecting sites and sites' access routes are not detrimentally altered.	The air quality in the vicinity of the drilling sites and sites' access routes will be maintained to stay within the national air quality standards.	Dust suppression must be conducted during the operational phase of the area.  Correct speed will be maintained at the proposed area site.  Vehicle maintenance must be conducted regularly to avoid excessive diesel fumes.	Appointed contractor and site manager.  Appointed contractor and site manager.  Appointed contractor and site manager.	Visual inspections of areas with possible dust emissions.  Regular speed checks.  Regular inspections.	ECO monthly.  Site manager monthly.  ECO monthly.	Throughout the operational phase.  Throughout the operational phase.  During operational phase.	
Wetland destruction and loss of habitat.		Sensitive Landscapes.	Ensure that the drilling operation does not have detrimental impacts on the farms dams and identified seepage zone.	Maintain the current state of the wetlands within the area.	Operation of the drilling site will be limited to be more than hundred meters from the edge of the sensitive landscapes. The applicant must also apply for a GA before drilling within 500m of nearby streams and/or wetlands	Appointed contractor.	Inspection to ensure compliance with the action plan.	ECO monthly.	During operational phase.	
Increased noise levels.		Noise aspects.	Ensure that the noise levels emanating from the operational sites will not have detrimental effects on the mine employees and surrounding communities/land owners.	The noise levels from the sites will be managed and measures will be taken to ensure that noise levels are below the National Noise Control Regulations, SANS10103:2008 guidelines.	Limit the maximum speed to 60 km/h or less, subject to risk assessment. Less noisy equipment will be used, the equipment will be kept in good working order and the equipment will be fitted with correct and appropriate noise abatement measures.  Ensure that the employees are issued with earplugs and that they are instructed to use them.  Educate employees on the dangers of hearing loss due to mine machinery noise.	Appointed contractor and site manager.  Site manager.  Appointed contractor.	Site checks regularly.  Regular monitoring and site check.  Use of earplugs will be checked and reported.	Site manager.  Site manager.  Site manager.	During operational phase.  During operational phase.  During operational phase.	



Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
Visual impacts on the surrounding communities and road users from the construction.		Visual aspects.	Ensure that the drilling operations do not result in detrimental visual impacts on surrounding properties, communities and road users.		Measures will be undertaken by the mine to ensure that the visual aspects from the site are complying with the relevant visual standards and objectives.	The land owner will be informed on the type of machinery and equipment to be used at the prospecting sites.  Lighting will be conducted in manner that will reduce the impacts on visual aspects at night times.	Applicant and site manager.  Appointed contractor.	The constructed perimeter berms will be inspected for compliance with the design specifications.  Night time inspection of the site will be undertaken.	Mine Engineer on a monthly basis.  The site manager once	During operational phase.  During operational phase.
Damage or destruction of sites with archaeological and cultural significance.		Sites of archaeological and cultural importance.	Ensure that the operational activities does not have detrimental impacts on the heritage sites.		The drilling operations will be undertaken in compliance with the requirements of the National Heritage Resources Act, 1999 (Act 25 of 1999) and recommendations from the specialist.	The drilling sites will be away from any identified grave site or heritage sites. A hundred-meter buffer will be created between the sites and the proposed camp and drilling sites.	Appointed contractor.	The site will be monitored for any prospecting related damages on a regular basis.	ECO monthly.	Throughout the operational phase.
Safety, intrusion and livelihood impacts on the landowners and occupiers.		Socio-economic aspects.	Ensure that the drilling operation does not significantly disrupt the daily living and movements of the land owners and occupiers.		The mine will ensure that all safety standards are met and that access to landowners and occupiers are not detrimentally affected.	Announce any road closures and other disruptions and maintain roads used for the operation in good order.  Keep communication with land owners and land occupiers open during the operational phase of the area. Ensure that negotiations on compensation are undertaken before the drilling programme can commence. This will include any other conditions that the landowner may deem necessary for the prospecting operation.  Ensure that safety measures are implemented to prevent impacts on land owners and occupiers.	Appointed contractor and site manager.  Applicant and site manager.  Site manager.	Liaison with affected parties.  Meetings with the landowners. Minutes of any meeting held with landowners and agreements will be recorded and filed.  Regular checks and inspections.	Site manager as and when necessary.  Site manager as and when meetings are held.  Site manager.	Throughout the operational phase.  Throughout the operational phase.  Throughout the operational phase.

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Interventions	Actions And	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
<b>DECOMMISSIONING AND CLOSURE PHASE</b>											
<b>Removal of infrastructure and final rehabilitation of disturbed areas</b>											
Compaction and contamination of soils within the rehabilitation site.	Soils.	Ensure that the soils in the vicinity of the rehabilitation site is not detrimentally impacted.	Rehabilitated areas will be maintained to comply with the closure objectives.	All vehicles and machinery used at the rehabilitation site will be kept in good working order.  No repairs of vehicles or machinery will be conducted at the rehabilitation site unless it is emergency repairs, which will be conducted on protected ground.  Movement of mine vehicles and machinery will be limited to demarcated routes, which will be rehabilitated when no longer in use.	Appointed contractor.  Appointed contractor.  Appointed contractor.	Vehicles and machinery will be inspected regularly and any oil incidences will be reported.  All incidents of emergency repairs will be inspected and occurrence recorded.  Rehabilitation site will be inspected to monitor areas with compaction or hydrocarbon contamination.	Site manager will conduct the inspections monthly.  Site manager.  ECO will conduct the inspections monthly.	Throughout the decommissioning and closure phases.  Throughout the decommissioning and closure phases.  Throughout the decommissioning and closure phases.			
Re-instatement of soil productivity, land capability, land use and topographical patterns.	Soils, Land Capability, Land Use and Topography.	Ensure that the rehabilitation of the sites re-instate the soil productivity, land capability, land use and topographical patterns	Rehabilitated areas will be maintained to comply with the closure objectives.	All infrastructure will be removed from the site in accordance to the rehabilitation plan.	Appointed contractor.	Removal of the infrastructure will be inspected.	Site manager will conduct the inspections.	During decommissioning phase.			
Pollution of surface water environment.	Surface Water.	Ensure that the rehabilitation of the site does not have detrimental impacts on the surface water environment.	The surface water leaving the rehabilitation site will comply with the DWS target water quality parameters.	The site area will be rehabilitated to be free draining.  Erosion protection measures such as the use of contour berms and repair of gullies will be undertaken until such time that the rehabilitated surfaces can be shown to be sustainable.	Appointed contractor.  Appointed contractor.  Rehabilitation officer.	Progress of rehabilitation will be monitored.  Areas where grass has not yet been established will be monitored for excessive erosion.	ECO will conduct monitoring of the rehabilitation annually.	Throughout the decommissioning and closure phases.			

Impact Reference	Activity	Environmental Attribute	Impact Objectives	Management	Targets (Impact Management Outcomes)	Management Actions And Interventions	Responsibility For Actions/Intervention	Monitoring Action	Responsibility and Frequency For Monitoring	Time period for Management Action
						Existing roads should be used where possible and new disturbed areas should be minimised.		Rehabilitation site will be inspected for misuse.		
Air pollution from rehabilitation site.		Air quality.	Ensure that rehabilitation do not have detrimental impacts on air quality.	Decommissioning and rehabilitation of the site will be conducted in such a manner that the ambient air quality does not exceed the air quality standards.	Where necessary, wet suppression will be conducted at areas with excessive dust emissions. Vehicles and machinery will be well maintained.  The traffic volumes and speed within the rehabilitation site will be controlled.	Appointed contractor.  Site manager and appointed contractor.	Visual inspections of areas with possible dust emissions will be conducted  Site inspections will be conducted.	ECO will conduct inspections monthly.  Site manager will conduct inspections monthly.	Throughout the decommissioning phase.  Throughout the decommissioning phase.	
Generated noise from the rehabilitation site.		Noise.	Ensure that the rehabilitation activities do not have detrimental impacts on people.	Ensure that the noise from the rehabilitation activities do not exceed the SANS 10103 Rating Level.	Smaller or less noisy equipment should where possible be used when working near receptors.  Equipment will be well maintained and fitted with the correct and appropriate noise abatement measures.	Appointed contractor and site manager.  Site manager and appointed contractor.	Regular site check.  Regular site check.	Site manager.  Site manager.	Throughout the decommissioning phase.  Throughout the decommissioning phase.	
Damage or destruction of sites with archaeological and cultural significance.		Sites of archaeological and cultural importance.	Ensure that the rehabilitation does not have detrimental impacts on heritage sites.	Should heritage sites be identified, rehabilitation in close proximity to the sites will not be damaged or destroyed by the rehabilitation activities.	A hundred-meter buffer will be maintained between any site and the rehabilitation site.	Appointed contractor and the site manager.	The sites will be monitored for any rehabilitation related damages.	ECO will monitor the site monthly.	Throughout the decommissioning phase.	

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## **6. FINANCIAL PROVISION**

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Section 24 P of NEMA requires an applicant applying for an environmental authorisation related to mining to comply with the prescribed financial provision for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts before the Minister responsible for mineral resources issues the environmental authorisation. The above-mentioned financial provision may be in the form of an insurance, bank guarantee, trust fund or cash.

Regulations pertaining to the financial provision for prospecting, exploration, mining or production operations (GNR 1147) were promulgated on the 20<sup>th</sup> of November 2015. National Treasure Minerals (Pty) Limited has undertaken the financial provision determination in line with the requirements of section 11 of the Regulations pertaining to the Financial Provision for prospecting, Exploration, Mining or Production Operations (GNR 1147). The financial provision determination for the proposed area is submitted to the Department of Mineral Resources and Energy (DMRE) for their consideration.

### **6.1 DESCRIPTION OF CLOSURE OBJECTIVES AND EXTENT TO WHICH THEY HAVE BEEN ALIGNED TO THE DESCRIBED BASELINE ENVIRONMENT**

The closure objectives for the proposed project as detailed under section 4.1 of the EMPr, were determined in consideration of physical (infrastructure), biophysical (environmental) and socio-economic measures as well as alignment to the closure components provided by the Department of Mineral Resources and Energy (DMRE). See section 4.1 for the closure objectives.

### **6.2 CONFIRMATION THAT THE ENVIRONMENTAL OBJECTIVES IN RELATION TO CLOSURE HAVE BEEN CONSULTED WITH LANDOWNERS AND INTERESTED AND AFFECTED PARTIES**

The draft BAR and EMPr is made available to the interested and affected parties during the public participation process for the proposed project. Note that the consultation of interested and affected parties included the owners of the properties directly affected by the proposed project and owners of land immediately adjacent the proposed project area.

The above confirms that the land owners and interested and affected parties will be consulted regarding the environmental objectives in relation to the closure of the proposed project.

### **6.3 REHABILITATION PLAN FOR THE PROPOSED PROJECT**

In terms of NEMA EIA Regulations, 2014, a Basic Assessment Report and EMPr must indicate the impact management measures. One of the impact management measures for the proposed prospecting activity is the rehabilitation of the disturbance caused by the prospecting activities. For the purpose of this report the rehabilitation measures for the proposed prospecting project will be provided in the form of a rehabilitation plan, described below.

The rehabilitation plan for the proposed projects describes the physical activities that will be undertaken to implement the closure plan during the course of the prospecting activities. The plan will include the following that are discussed below i.e.:

- Prospecting borehole layout
- Detail rehabilitation standards; and
- Detail the rehabilitation schedule.

### **6.3.1 Prospecting Borehole Layout**

The prospecting layout for the proposed prospecting project will be developed to minimise negative impacts on the environment such that after land use is achieved. This layout will be developed to be in line with the closure objectives provided in this report.

The development of the prospecting layout for the proposed prospecting project will take into consideration all identified no-go areas within the prospecting right area.

In view of the above the layout plan has been developed such that the following is achieved i.e.:

- Minimise the disturbed area;
- Avoid impacts on identified sensitive areas; and
- Views of affected communities and interested and affected parties to be considered

### **6.3.2 Rehabilitation Standards**

The following rehabilitation standards have been developed for the proposed prospecting project. These have been developed to ensure that rehabilitation will achieve the following at the project area i.e., preserve the environment, protect against environmental damage and repair any disturbance caused during the prospecting activities.

- Rehabilitation plans will be developed before commencement of the prospecting project
- All legal requirements will be met before commencement of the prospecting project
- All disturbed areas will be rehabilitated to restore affected environment
- Disturbed areas will be maintained for the duration of the prospecting activities such that no secondary impacts result
- All possible source of contaminants will be identified and measures taken to prevent and manage spillages
- Adequate monitoring programme must be developed and implemented
- Ensure communication with affected communities and interested and affected parties

### **6.3.3 Decommissioning of The Prospecting Operation**

#### **6.3.3.1 Contractor Campsite**

No permanent structures will be constructed at the campsite, rather mobile structures will be used. Since these are mobile, all structures (tents or caravans, solid waste receptacles, water tanks, chemical toilet, additional storage area etc.) will be removed (mobile). Waste stored on site will be disposed of in an appropriate manner. Any industrial waste from the site will be recycled (sold) or disposed of properly. In view of the above no demolishing and dismantling will be undertaken.

#### **6.3.3.2 Roads**

All constructed roads that will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to the satisfaction of the Regional Manager.

Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre prospecting situation.

### 6.3.3.3 Drilling site

#### Drilling Sump

The sumps will be backfilled and covered with topsoil.

#### Borehole

The borehole logs will be removed from site and the borehole plugged and covered with topsoil.

Drill Rig, Drill Rod Stand and Drill Rig stockpile

The rods and stand will be placed in the drill rig that will be driven away from site.

#### Geologist sampling area

This area will have a tent/gazebo, sampling equipment and waste collection receptacles that will be placed at the LDV and taken away from the site.

### 6.3.3.4 Post Closure Land Use

Post closure, the prospecting area will consist of re-vegetated areas with vegetation cover comparable to the surrounding areas. No prospecting related infrastructure will remain on the prospecting site. The land use after prospecting will conform to the pre-prospecting topography. After rehabilitation, the areas affected by prospecting will be stable and erosion free.

### 6.3.3.5 Rehabilitation Schedule

Table 18 below provides the schedule of actions for rehabilitation, decommissioning and closure of the prospecting project, which will ensure avoidance, minimisation and management of residual or latent impacts from the proposed prospecting activities linked to the prospecting works programme including assumptions and schedule drivers.

A campsite will only be used if the applicant cannot find a suitable accommodation nearby the prospecting area.

Roads will not ideally be constructed however should the existing roads not provide the required access, tracks or road will be used.

Concurrent rehabilitation of disturbed areas will be undertaken as drilling continues. In view of the above, the schedule provides rehabilitation of a campsites and roads.

**Table 17: Rehabilitation Schedule**

Rehabilitation Actions	Assumptions and Schedule drivers
<b>Rehabilitation, Decommissioning and Closure</b>	
Activity/Area: Contractor Campsite	
Areas within the camp sites where vegetation has been removed and where the site has been compacted must be scarified and ripped.	All spills and waste material from the site would have been removed before rehabilitation.

Rehabilitation Actions	Assumptions and Schedule drivers
<p>Before and during the prospecting operation and after rehabilitation photographs of the camp sites will be taken and kept on record.</p>	<p>Monitoring of the rehabilitated area will be conducted to ensure that the area maintains a sustainable environment.</p>
<p>Activity/Area: Roads</p>	
<p>Any foreign material (used to construct roads) will be removed and disposed of in an approved manner prior to rehabilitation.</p>	<p>All spills and waste material from the site would have been removed before rehabilitation.</p>
<p>Roads and tracks with significant damage will be ripped or ploughed. Where necessary, fertilizer will be applied over the area.</p>	<p>Monitoring of the rehabilitated area will be conducted to ensure that the area maintains a sustainable environment.</p>
<p>Should the revegetation show to be slow, soil analyses will be conducted and the seeding be done in accordance top the results of the analyses.</p>	<p>Except for farm roads, no tracks and infrastructure related to the prospecting operation will remain in place after the decommissioning phase.  Ripping shall be at 90° to the inherent slope</p>
<p>Activity/Area: Drill Site</p>	
<p>Drill site sumps</p>	
<p>Sumps will either be emptied of the water or allowed water to evaporate.</p>	<p>Rehabilitation of the drilling site will commence immediately after completion of the drilling.</p>
<p>The sumps will be backfilled with subsoils and thereafter topsoil removed from the sump.</p>	<p>The area disturbed is small – approximately 1 m x 1 m x1 m per sump per drill site.</p>
<p>Where necessary, fertilizer will be applied over the area.</p>	<p>All spills and waste material from the site would have been removed before rehabilitation.</p>
<p>The area will be allowed to seed naturally. Should the revegetation show to be slow, soil analyses will be conducted and the seeding be done in accordance top the results of the analyses.</p>	<p>Monitoring of the rehabilitated area will be conducted to ensure that the area maintains a sustainable environment.  The sumps will be rehabilitated in such a manner to return the area to as close as possible to its pre-drilling environment.</p>
<p><i>Drill site boreholes</i></p>	
<p>All unused borehole logs will be removed from site and disposed of in an appropriate manner.</p>	<p>Rehabilitation of the drilling site will commence immediately after completion of the drilling.</p>
<p>The borehole plug must be placed at least 0.5 m below surface.</p>	<p>All spills and waste material from the site would have been removed before rehabilitation.</p>
<p>The borehole will then be covered and levelled with topsoil.</p>	

Rehabilitation Actions	Assumptions and Schedule drivers
Where necessary, fertilizer will be applied over the area.	Monitoring of the rehabilitated area will be conducted to ensure that the area maintains a sustainable environment.
<b>Post Site Closure</b>	
Activity/Area: Entire Prospecting Right Area (Care, Maintenance and Monitoring)	
Visual inspection of all rehabilitated areas will be conducted (ad hoc inspections will be conducted).	A dedicated manager will be employed for ensuring that the area is inspected and all areas requiring attention will be identified and issues addressed.
Follow up erosion control and seeding over areas showing erosion gullies and significantly slow revegetation will be conducted.	Post closure, the prospecting area will consist of re-vegetated areas with vegetation cover comparable to the surrounding areas. The area will conform to the pre-prospecting topography. The areas affected by prospecting will be stable and erosion free.

**6.4 COMPATIBILITY OF THE REHABILITATION PLAN WITH THE CLOSURE OBJECTIVES**

The rehabilitation plan will be drafted to be compatible with the closure objectives.

**6.5 DETERMINATION OF THE QUANTUM OF THE FINANCIAL PROVISION REQUIRED TO MANAGE AND REHABILITATE THE ENVIRONMENT**

The financial pecuniary provision for Witkranz prospecting area will be determined based on the requirements of Chapter 2.4.1 of the *Guideline document for the evaluation of the quantum of closure-related financial provision provided by a Mine, revision 1.6, September 2004, DMRE*. The financial provision for the first year will be determined and will, with its associated reports be submitted to the competent authority.

**6.6 METHOD OF PROVIDING FOR THE FINANCIAL PROVISION**

According to Regulation 8 of the Regulations pertaining to the financial provision for prospecting, exploration, mining or production operations (GNR 1147), an applicant or holder of a right or permit must make financial provision by one or a combination of the following:

- financial guarantee from a bank registered in terms of the Banks Act, 1990 (Act No. 94 of 1990) or from a financial institution registered by the Financial Services Board as an insurer or underwriter;
- deposit into an account administered by the Minister responsible for mineral resources; or
- contribution to a trust fund established in terms of applicable legislation.

National Treasure Minerals (Pty) Limited has opted to use a financial guarantee to provide for the determined quantum for financial provision.



**Table 18: Financial provision for Witkrantz Prospecting Right**

<b>"Rules-based" assessment of the quantum for financial provision</b>								
<b>CALCULATION OF THE QUANTUM</b>								
<b>Mine:</b>	NATIONAL TREASURE MINERALS (PTY) LTD			<b>Location:</b>	Witkrantz Prospecting Project			
<b>Evaluators:</b>	O.T Shakwane of Geovicon Environmental (Pty) Limited			<b>Date:</b>	25-Jan-22			
<b>No.:</b>	<b>Description:</b>	<b>Unit:</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E=A*B*C*D</b>	
			<b>Quantity</b>	<b>Master rate</b>	<b>Multiplication factor</b>	<b>Weighting factor 1</b>	<b>Amount (Rands)</b>	
			<b>Step 4.5</b>	<b>Step 4.3</b>	<b>Step 4.3</b>	<b>Step 4.4</b>		
1	Dismantling of processing plant & related structures	m <sup>3</sup>	0.00	R 18.36	1.00	1.10	R 0.00	
2 (A)	Demolition of steel buildings & Structures	m <sup>2</sup>	0.00	R 255.82	1.00	1.10	R 0.00	
2 (B)	Demolition of reinforced concrete buildings & structures	m <sup>2</sup>	0.00	R 376.99	1.00	1.10	R 0.00	
3	Rehabilitation of access roads	m <sup>2</sup>	0.00	R 45.78	1.00	1.10	R 0.00	
4 (A)	Demolition & rehabilitation of electrified railway lines	m	0.00	R 444.30	1.00	1.10	R 0.00	
4 (B)	Demolition & rehabilitation of non electrified railway lines	m	0.00	R 242.34	1.00	1.10	R 0.00	
5	Demolition of housing &/or administration facilities	m <sup>2</sup>	0.00	R 511.63	1.00	1.10	R 0.00	
6	Opencast rehabilitation including final voids & ramps	ha	0.00	R 268 200.17	1.00	1.10	R 0.00	
7	Sealing of shafts, adits & inclines	m <sup>3</sup>	0.00	R 137.33	1.00	1.10	R 0.00	
8 (A)	Rehabilitation of overburden & spoils	ha	0.08	R 178 800.11	1.00	1.10	R 15 734.41	
8 (B)	Rehabilitation of processing waste deposits & evaporation ponds (basic)	ha	0.00	R 222 692.31	0.80	1.10	R 0.00	
8 (C)	Rehabilitation of processing waste deposits & evaporation ponds (acidic)	ha	0.00	R 646 804.03	0.80	1.10	R 0.00	
9	Rehabilitation of subsidised areas	ha	0.00	R 149 733.48	1.00	1.10	R 0.00	
10	General surface rehabilitation (Plugging of 10 boreholes)	ha	0.08	R 141 639.86	1.00	1.10	R 12 464.31	
11	River diversions	ha	0.00	R 141 639.86	1.00	1.10	R 0.00	
12	Fencing	ha	0.00	R 161.56	1.00	1.10	R 0.00	
13	Water management	ha	0.00	R 53 855.46	1.00	1.10	R 0.00	
14	2 to 3 years of maintenance & aftercare	ha	0.08	R 18 849.42	1.00	1.10	R 1 658.75	
15 (A)	Specialist study	SUM	0.00	R 200 000.00	1.00	1.00	R 0.00	
15 (B)	Specialist study	SUM	0.00	R 0.00	1.00	1.00	R 0.00	
<b>Sub Total 1</b>								
(Sum of items 1 to 15 Above)							<b>R 29 857.47</b>	
<b>Multiply by Weighting factor 2</b>		1.1		R 2 985.75			R 2 985.75	
1	Preliminary and general	Add 12% if subtotal 1 is less than R100,000,000.00						R 3 582.90
2	Contingencies	Add 10% of subtotal 1						R 2 985.75
<b>Sub Total 2</b>								
(Subtotal 1 plus sum of management & contingencies)							<b>R 39 411.85</b>	
VAT (15%)							R 5 911.78	
(Subtotal 2 plus VAT)				<b>GRAND TOTAL</b>			<b>R 45 323.63</b>	

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## **7. MECHANISM FOR MONITORING COMPLIANCE WITH AND PERFORMANCE ASSESSMENT AGAINST THE ENVIRONMENTAL MANAGEMENT PROGRAMME AND REPORTING THEREOF**

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### **7.1 INSPECTIONS AND MONITORING**

During the impact assessment, potential impacts on the environment were identified. Mitigation measures were also specified for prevention and management of the impact so as to minimise their effect on the environment. This section will describe how the mine intends to ensure that the mitigation measures are being undertaken and that their effectiveness is proven.

A monitoring programme has been developed for the identified impacts and their mitigation measures. This monitoring programme will be undertaken and results thereof used to determine the effectiveness of the mitigation measures. The ECO will have an overall responsibility for ensuring that all monitoring is conducted according to the approved EMPr.

### **7.2 MONITORING COMPLIANCE WITH AND PERFORMANCE ASSESSMENT AGAINST THE ENVIRONMENTAL MANAGEMENT PROGRAMME AND REPORTING THEREOF**

As part of the general terms and conditions for a prospecting right, and in order to ensure compliance with the environmental management programme and to assess the continued appropriateness and adequacy of the environmental management programme, National Treasure Minerals (Pty) Limited will:

- Conduct monitoring on a continuous basis (see EMPr)
- Conduct performance assessments of the environmental management programme annually
- Compile and submit a performance assessment report to the minister in which compliance with the approved environmental management programme is demonstrated

The performance assessment report will as a minimum contain the following:

- Information regarding the period applicable to the performance assessment
- The scope of the assessment
- The procedure used for the assessment
- The interpreted information gained from monitoring the approved environmental management programme
- The evaluation criteria used during the assessment
- The results of the assessment

Recommendations on how and when non-compliance and deficiencies will be rectified

### **7.3 PROCEDURE FOR ENVIRONMENTAL RELATED EMERGENCIES AND REMEDIATION**

National Treasure Minerals (Pty) Limited has developed procedures for environmental related emergencies for Witkrantz prospecting area which is explained in more detail below.

Note that these procedures will be revised by the responsible person. The date of commencement of the revised procedures will always be indicated to prevent confusion

**7.3.1 Introduction**

An effective, comprehensive, well considered and tested environmental emergency preparedness and response plan has the potential to save lives, prevent unnecessary damage to the company and other property and to manage environmental risk. The aim is to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. However, the emergency preparedness and response should be reviewed and revised where necessary.

**7.3.2 What is an Environmental Emergency?**

An environmental emergency is an unplanned event, which has the potential to result in a significant adverse environmental impact and/or could result in legal liability to National Treasure Minerals (Pty) Limited in terms of environmental legislation requirements. The following define most likely potential environmental emergencies:

- Hydrocarbon spills or leaks
- Surface fires, including veld fires
- A chemical spill
- Transportation accidents
- Other environmental emergencies requiring special services

**7.3.3 Purpose of the procedure**

To provide guidance to all mine employees and contractors in the event of an environmental emergency at Witkranz prospecting area and related to its activities.

This procedure is developed so as to provide guidance to ensure that:

Danger to the environment, personnel, contractors and the non-employee is minimised.

- Legal liability is managed and minimised.
- Public relations are effectively managed during and following emergencies.
- Reporting is effective and corrective/follow-up actions are implemented.

**7.3.4 Who should use these procedures?**

This procedure contains information relevant to all employees and contractors of the mine. It is the responsibility of all employees to familiarise themselves with the contents of this procedure. Furthermore, mine management should ensure that all contractors have access to this procedure and the requirements contained herein (See Table 19).

**7.3.5 Responsibilities**

**Table 19: Responsibilities**

<b>Mine Management</b>	National Treasure Minerals (Pty) Limited is responsible for the safety and well-being of employees working at Witkranz prospecting area as well as the protection of the environment from unnecessary negative impacts. The management of the prospecting area has a responsibility to initiate a warning process should an emergency occur or should something at the
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	prospecting area deteriorate in an uncontrolled manner presenting a risk to employees, the public or the environment.
<b>Local Government(s)</b>	Local governments have the responsibility to warn residents of a hazardous situation, these warnings must be based on information provided by the prospecting area.
<b>All employees, contractors and other relevant parties</b>	All employees, contractors and other relevant parties should ensure that they are familiar with this procedure.

### 7.3.6 Notification process

There are six main steps in managing an emergency, from the identification of the situation to final close off. They are as follows:

- Find and identify
- Ensure human safety
- Reporting
- Containment and clean-up
- Corrective action
- Monitoring

### 7.3.7 Emergency equipment and supplies

There is a directory of emergency equipment and other supplies on site as well as person/s responsible for the equipment.

### 7.3.8 Communication systems

Communication is critical during an emergency on site so that efforts to manage the situation are coordinated to produce the desired results. The communication channels that are available on site include:

- Internal phone line system
- Hand held radios
- Cellular phones

### 7.3.9 Training

The mine management ensures that employees are trained regarding potential emergencies that may occur at Witkrantz prospecting area

### 7.3.10 Review of procedure

To ensure that the procedure is adequate, management will review the procedure at any time deemed necessary and change the emergency procedures at Witkrantz prospecting area.

### 7.3.11 Emergency Response flowchart for National Treasure Minerals (Pty) Limited

The emergency response at Witkrantz prospecting area is undertaken, as shown in Figure 18

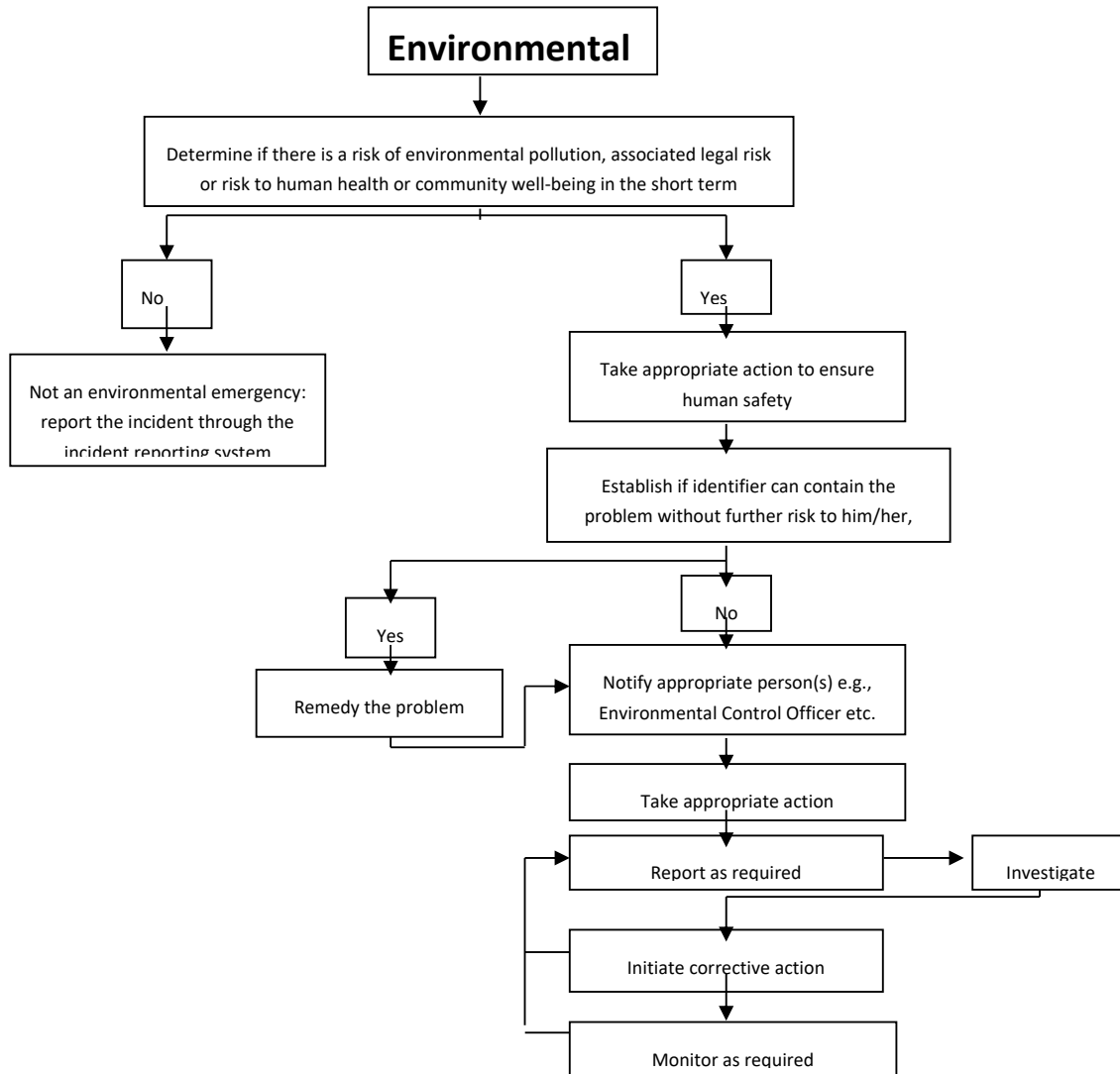


Figure 18: Emergency response.

## 7.4 ENVIRONMENTAL AWARENESS PLAN

In terms of section 39(3)(c) of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), Witkranz prospecting area must compile and implement an environmental awareness plan. The above-mentioned environmental awareness plan must describe the manner in which the site manager (in this case Witkranz prospecting area) will inform their employees of any environmental risk which may result from their work and the manner in which the environmental risks will be addressed to avoid pollution or/and degradation of the environment. This document, therefore concerns the details of the environmental awareness plan for Witkranz prospecting area as required by the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002).

### 7.4.1 Objectives and Legal Requirements

The following are the objectives of the environmental awareness plan

- To identify the necessary training needs for different categories of employees in the mine
- To train all employees on environmental issues on the mine

The following legislation apply to this environmental awareness plan

- Employment Equity Act, 1998 (Act 55 of 1998)
- National Environmental Management Act, 1998 (Act 77 of 1998)
- Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002).

#### **7.4.2 Manner of informing employees of risks to avoid pollution and degradation of the environment**

The identification of environmental training and environmental awareness needs are derived from an analysis of the type of role different categories of employees play at Witkranz prospecting area. The following categories are considered, viz:

- Senior Management
- Middle management (Environmental Officers)
- Supervisors
- Operators
- Visitors and contractors

Each of these categories have different responsibilities and therefore have different knowledge requirements and environmental awareness training needs, to obtain that knowledge.

The different categories and environmental awareness and training needs are summarised below in Table 20:

**Table 20: Environmental Awareness Matrix.**

Occupation Category	EMP Responsibility	Required knowledge and output	Training required	Interval
Senior management	Managing	Understand the EMP objectives	Induction and post-leave awareness/training	Annually
		Knowledge of the prospecting area's significant impacts and risks.	EMP Workshops	Once off
		Review the EMP actions	EMP objectives and actions /Management reviews	Annually
		Knowledge of EMP Procedures (awareness and emergency)	Specific training program on EMP	Once off, refresh annually
Middle and Junior management	Implementing and daily management	Knowledge of prospecting area's significant environmental impacts	EMP Review workshops	Annually
		Setting of EMP objectives for environmental improvement	EMP Review workshops	Annually
		Knowledge of EMP procedures (awareness and emergencies)	Specific training programmes on EMP	Once off, refresh annually
	Adhering to procedures to control impacts	Understand EMP objectives	Induction and post-leave training	Annually
		Knowledge of significant impacts	Induction and post-leave training	Annually
		Knowledge of procedures (awareness and emergency)	EMP Review workshop	Annually
Plant and machine operators, assemblers and elementary occupations	Executing assigned EMP actions	General awareness of EMP impacts and objectives.	Induction and post-leave training	Continuously
	Controlling work activities to prevent impacts.			

Occupation Category	EMP Responsibility	Required knowledge and output	Training required	Interval
		Understand environmental requirements relating to work activities and consequences of not following requirements	Induction and post-leave training	Annually
		Knowledge of procedures	Training and information sharing	Continuously
Visitors and contractor	Managing and controlling daily actions to prevent or control impacts	Basic awareness of EMP	Induction or specific modules/ awareness programme	Once off, annual review if applicable
		Environmental requirements of work activities	Induction or specific awareness programme	Once off, annual review if applicable
		Knowledge of procedures	Training and information sharing	Continuously
		Understanding environmental consequences of personal actions and performance.	Induction or specific modules/ awareness programme	Once off, annual review if applicable
		Compliance to procedures	Induction or specific awareness programmes.	
Personnel requiring specific training and awareness identified on site by management, Environmental Officer, training department, etc.	Managing and controlling daily actions to prevent impacts	Examples include but are not limited to: Waste management Hazardous chemical handling	Specific training programme on EMP procedures.	As required



### **7.4.3 Induction for all employees, including contractors**

All employees (including contractor employees) undergo induction. Witkranz prospecting area's induction includes training and awareness on environmental issues on the prospecting area and is compulsory for all new employees. The induction programme as mentioned above, have an environmental management component. On an annual basis the environmental section of the induction gets updated. Consideration is given to the following:

- Significant environmental impacts as identified in the EMP
- Procedures: environmental awareness and emergency procedures
- Trends in incidents
- Trends in audit findings

### **7.4.4 General environmental awareness training**

General awareness training is offered to operators, processors and the other various sections of the mine during the safety toolbox talks. This is conducted on rotational basis. New environmental awareness topics are determined and new topics are introduced after all the shifts have received training/awareness on the current topic. The following is undertaken to ensure that the above awareness training is conducted.

- A monthly environmental awareness topic for discussion is distributed to all mine sections. These topics are discussed at the safety toolbox talks, by SHE (Safety, Health and Environmental) representative and environmental officers if available.
- The topics are displayed on the notice boards of all mine sections.
- Ad hoc environmental awareness sessions to various departments/sections are conducted on request. The presentations focus on the environmental issues relevant to individual tasks.

### **7.4.5 Provision for job specific environmental awareness training**

Job specific training is developed to address urgent training needs as identified /required. The training material focus on the following:

- Waste prevention and control (implementation of the waste management procedure).
- Water management (Leaking pipes and taps)
- Hydrocarbon and chemical spill reporting and clean-up
- Storing and handling of chemicals
- Rehabilitation
- Dust management on the mine

Supervisory staff within specific mine sections are equipped with the necessary knowledge and information to guide their employees on environmental aspects applicable in performing a specific task.

### **7.4.6 Competency training**

Management (training official/environmental officer) is responsible for the environmental awareness training of middle management and supervisors. This training is conducted through workshops. If

required, external organisations may be requested to provide training to selected employees (e.g., EMP auditing).

Competence and the effectiveness of training and development initiatives as described in the matrix, are determined through the following:

- Trend analysis and reporting
- Analysis of work areas during visits and audits
- Trend analysis of monthly incidents (or zero tolerance if available) as recorded per mine section.

#### **7.4.7 Review of awareness and training material**

The content of all awareness and training material will be updated at least once a year.

#### **7.4.8 Roles and responsibilities**

In the case where there is no training department on site, a responsible person should be identified (Mine manager, Environmental Officer or Consultant) to ensure that the objective of this procedure is met.

**7.5 UNDERTAKING TO COMPLY**

I, ....., the undersigned and duly authorised thereto by **National Treasure Minerals (Pty) Limited** have studied and understand the contents of this document in its entirety and hereby duly undertake to adhere to the conditions as set out therein including the amendment(s) agreed to by the Regional Manager.

Signed at ..... this.....day of.....20.....

.....  
**Signature of applicant**

.....  
**Designation**

**APPROVAL**

Approved in terms of Section 39(4) of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002)

Signed at.....this.....day of.....20.....

.....  
**REGIONAL MANAGER**

**REGION:**.....