



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

**ENVIRONMENTAL IMPACT ASSESSMENT REPORT
AND
ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT**

**PROSPECTING RIGHT APPLICATION OF DIAMONDS ALLUVIAL &
DIAMONDS GENERAL NEAR SCHWEIZER-RENEKE ON THE
REMAINING EXTENT OF PORTION 2 (CYPHERFONTEIN) AND PORTION
15 (ON AVON – A PORTION OF PORTION 2) OF THE FARM
MARAETCHESFONTEIN 54, REGISTRATION DIVISION: HO, NORTH
WEST PROVINCE.**

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

NAME OF APPLICANT	Brakpan Trust
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CLAUSE

This report has been compiled by Milnex 189 CC, using information provided by **Brakpan Trust** the client as well as third parties, which information has been presumed to be correct. While Milnex 189 CC have made every endeavour to supply accurate information, and exercised all care, skill and diligence in the drafting of this report, errors and omissions may occur. Accordingly, Milnex 189 CC does not warrant the accuracy or completeness of the materials in this report. Milnex 189 CC does not accept any liability for any loss or damage which may directly or indirectly result from any advice, opinion, information, representation or omission, whether negligent or otherwise, contained in this report. Milnex 189 CC does not accept any liability for any loss or damage, whether direct, indirect or consequential, arising out of circumstances beyond the control of Milnex 189 CC, including the use and interpretation of this report by the client, its officials or their representatives or agents. This document contains information proprietary to Milnex 189 CC and as such should be treated as confidential unless specifically identified as a public document by law. Milnex 189 CC owns all copyright and all other intellectual property rights in this report. The document may not be copied, reproduced in whole or in part, or used for any manner without prior written consent from Milnex 189 CC. Copyright is specifically reserved in terms of the Copyright Act 98 of 1987 including amendments thereto. By viewing this disclaimer and by accepting this document, you acknowledge that you have read and accepted these Terms of Use and undertake to keep the information contained herein confidential and not to do any act or allow any act which is in breach of these Terms of Use.

IMPORTANT NOTICE

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

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

- (1) The environmental impact assessment process must be undertaken in line with the approved plan of study for environmental impact assessment.
- (2) The environmental impacts, mitigation and closure outcomes as well as the residual risks of the proposed activity must be set out in the environmental impact assessment report.

OBJECTIVE OF THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

2. The objective of the environmental impact assessment process is to, through a consultative process-
 - (a) determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;
 - (b) describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
 - (c) identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;
 - (d) determine the--
 - (i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and
 - (ii) degree to which these impacts-
 - (aa) can be reversed;
 - (bb) may cause irreplaceable loss of resources, and
 - (cc) can be avoided, managed or mitigated;
 - (e) identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;
 - (f) identify, assess, and rank the impacts the activity will impose on the preferred location through the life of the activity;
 - (g) identify suitable measures to avoid, manage or mitigate identified impacts; and
 - (h) identify residual risks that need to be managed and monitored.

OBJECTIVE OF THE ENVIRONMENTAL IMPACT ASSESSMENT

1) Contact Person and correspondence address

A. Details of:

i) The EAP who prepared the report

ii) Expertise of the EAP

Name of Practitioner	Qualifications	Contact details
Lizanne Esterhuizen	Honours Degree in Environmental Science (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: lizanne@milnex-sa.co.za
Percy Sehaole	Master's Degree in Environmental Science (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: percy@milnex-sa.co.za
Danie Labuschagne	Master's Degree in Environmental Management and Geography (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: danie@milnex-sa.co.za

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

Milnex 189 CC was contracted by Brakpan Trust the independent environmental consultant to undertake the Scoping and EIA process for a Prospecting Right of Diamond Alluvial & Diamond General near Schweizer-Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province. Milnex 189 CC does not have any interest in secondary developments that may arise out of the authorisation of the proposed project.

Milnex 189 CC is a specialist environmental consultancy with extensive experience in the mining industry which provides a holistic environmental management service, including environmental assessment and planning to ensure compliance with relevant environmental legislation. Milnex 189 CC benefits from the pooled resources, diverse skills and experience in the environmental and mining field held by its team that has been actively involved in undertaking environmental studies for a wide variety of mining related projects throughout South Africa. The Milnex 189 CC team has considerable experience in environmental impact assessment and environmental management, especially in the mining industry.

Lizanne Esterhuizen, Percy Sehaole & Danie Labuschagne have experience consulting in the environmental field. Their key focus is on environmental assessment, advice and management and

ensuring compliance to legislation and guidelines. They are currently involved in undertaking EIAs for several projects across the country (refer to **Appendix 2** for CV)

B. DESCRIPTION OF THE PROPERTY.

Farm Name:	1) Remaining Extent of Portion 2 (Cypherfontein) 2) Portion 15 (On Avon – a Portion of Portion 2)	of the farm Maraetchesfontein 54
Application area (Ha)	294.824ha	
Magisterial district:	HO	
Distance and direction from nearest town	The property is located approximately 11.5km North East of Schweizer-Reneke adjacent to the R504 towards Migdol.	
21 digit Surveyor General Code for each farm portion	1) T0HO00000000005400002 2) T0HO00000000005400015	

iii. Farm co-ordinates

Farms	Latitude	Longitude
1) Remaining Extent of Portion 2 (Cypherfontein) of the farm Maraetchesfontein 54	27° 7'29.82"S	25°24'11.23"E
	27° 7'40.12"S	25°22'48.44"E
	27° 7'45.75"S	25°22'48.44"E
	27° 7'51.79"S	25°22'48.59"E
2) Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54	27° 8'24.40"S	25°23'26.42"E
	27° 8'16.44"S	25°24'6.73"E
	27° 8'2.17"S	25°24'21.00"E
	27° 7'47.70"S	25°24'16.77"E

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

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

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

i) LISTED AND SPECIFIED ACTIVITIES

NAME OF ACTIVITY (All activities including activities not listed) (E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	Aerial extent of the Activity Ha or m ²	LISTED ACTIVITY Mark with an X where applicable or affected.	APPLICABLE LISTING NOTICE (GNR 983, GNR 984 or GNR 985)/NOT LISTED
Clearance of indigenous vegetation	294.824 ha- Only the areas where prospecting takes place, will be cleared. From the number of pits and trenches they plan to dig, it was calculated that only 2.47ha of vegetation will be cleared. No more than 100 pits and 60 trenches will be dug No more than 0.707 ha will be left as un-rehabilitated in two years. Concurrent backfilling will take place in order to rehabilitate.	X	GNR. 984
Office and Workshop	50m ²	-	-
Roads	+- 10 km	-	-
Stockpiling op topsoil	294.824 ha – 20m x 20m x 1.5m x 60 = 36 000m ³	-	-
Prospecting of Diamond Alluvial - Excavations	294.824 ha – 3m x 2m x 5m pit (100 pits), 20m x 20m x 2m trench (60 trenches)	X	GNR. 984
Processing Plant	1 x 10 Ft Pan – 79 200 tons to be washed	X	-

Listed activities

Description of the overall activity.	1. Listing Notice GNR 984, Activity 15: "The clearance of an area of 20 hectares or more, of indigenous vegetation." – Random indigenous vegetation clearance of over a 294.824-hectare area.
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<p>(Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaissance permit, Technical co-operation permit, Additional listed activity)</p>	<p>2. Listing Notice GNR 984, Activity 19: <i>“The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act (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)”</i> – Prospecting right with bulk samples for the mining of Diamonds Alluvial (DA) and Diamonds General (D) including associated infrastructure, structures and earthworks.</p> <p>3. Listing Notice GNR 984, Activity 21: <i>“Any activity including the operation of that activity associated with the primary processing of a mineral resource including winning, reduction, extraction, classifying, concentrating, crushing, screening and washing but excluding the smelting, beneficiation, refining, calcining or gasification of the mineral resource in which case activity 6 in this Notice applies.”</i></p> <p>4. Listing Notice GNR 983, Activity 20: <i>“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...”</i> – Prospecting right with bulk samples for the mining of Diamonds Alluvial (DA) and Diamonds General (D) including associated infrastructure, structure and earthworks.</p>
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ii) **DESCRIPTION OF THE ASSOCIATED STRUCTURES AND INFRASTRUCTURE RELATED TO THE DEVELOPMENT** (Describe Methodology or technology to be employed, and for a linear activity, a description of the route of the activity)

Brakpan Trust has embarked on a process for applying for a prospecting right for the prospecting of Diamonds Alluvial & Diamonds General near Schweizer-Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province are preferred due to the sites mineral resources. Brakpan Trust requires a prospecting right in terms of NEMA and the Mineral and Petroleum Resources Development Act to mine diamonds alluvial and diamonds general within the Mamusa Local Municipality, North West Province.

There are various operational alluvial diamond mines adjacent to these properties. Property is known for diamonds, previous prospecting was done Rooikoppie gravel outcrops can be seen on certain areas. The property is an area known to be diamond bearing.

Access roads

Several existing roads and tracks already traverse the proposed prospecting site and where practicable, these roads will be used. Access will be obtained from a grave; road off the R504.

Temporary access roads may be established for repeated access to the site if the identified site cannot be accessed via existing roads and tracks, but this should be limited and the location thereof should be corresponded with and approved by the property owner.

These roads should also be normal two-tracked farm roads.

Water Supply

Water will be sourced from the applicant's farm through borehole abstraction. Please see **Appendix 12** for the Hydrogeological Assessment.

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

Only 1 x 10 feet washing pan will be used, the amount of water for the pan will be 11 000 L/hour from which 30% is re-used.

Ablution

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

Storage of dangerous goods

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

Types of lubricants will be dependent on the machines used, this will include diesel, fuel and oil. It should be noted that no more than 80 000 cubes metres of diesel may be stored on site.

Prospecting activities and phases

Please find the Prospecting Work Programme attached as **Appendix 8**.

List of equipment's & infrastructure
1x Cat Front End Loader
1x Libell Backactor
1x 10 feet Pan with Conveyor
1 x 65 KVA Generator
1x Sorting house
Pumps and Cables

Phase 1 – Site Visit

A formal site visit will be done within 90 days after the prospecting right was executed.

Phase 2 – Desktop studies

Desktop studies will be undertaken after the site investigation was done to determine the target areas including the identification of any infrastructure to be build and any potential problems that may need to be addressed.

Phase 3 – Pitting

Pits will be dug by an excavator to look for gravel. If gravel is found, the applicant will determine the composition and quality of the gravel.

It is envisaged that 100 pits will be dug. It may be less depending on results.

294.824 ha- 3m x 2m x 5m pit (100 pits). It is planned that only 100 pits will be excavated in the first year, but it may be more if the process is quicker than planned for. It should be kept in mind that no more than 100 pits will be excavated.

The total area to be disturbed a year will be- 100 pits x (3m x 2m) = 0.06ha per year

Phase 4 – Trenches

The applicant will proceed with this way of prospecting by means of the open cast / trenching method, simultaneously or after pitting depending on the information obtained from the earlier work done. The trenches will be dug to remove and to wash the gravel. It will be washed by 16 feet washing pan to determine diamond proceeds per 100 ton of gravel.

294.824 ha- 20m x 20m x 3m trench (60 Trenches). It is planned that only 5 trenches will be excavated in the first year to determine the feasibility of the resource, **if more trenches are planed the revised quantum will be submitted to the department.** It should be kept in mind that no more than 60 trenches will be excavated.

The total area to be disturbed a year will be- 5 trenches x (20m x 20m) = 0.2ha per year. No more than 0.26 ha will be left as un-rehabilitated in two years. Rehabilitation will be done concurrently.

Phase 5 – Consolidation and interpretation

All data will be consolidated and processed to determine the diamond bearing resource on the property. This will be a continuous process throughout the prospecting work. Each phase of prospecting will be followed by desktop studies involving interpretation and modeling of all data gathered and how the applicant will proceed with the work program in terms of activity, quantity, resources expenditures and duration. A pre-feasibility study will be done to determine the preliminary economic assessment of the resource and to determine whether additional evaluation of the deposit will be warranted to increase confidence in the resource estimation. Prospecting work will be conducted by a multi-disciplinary team to determine whether the resource can be viable exploited and if the results can support an application for a mining right.

E. Policy and Legislative Context

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT (a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process);	REFERENCE WHERE APPLIED
The Constitution of South Africa (Act No. 108 of 1996)	-
The National Environmental Management Act (Act No. 107 of 1998)	S24(1) of NEMA S28(1) of NEMA
The National Water Act (Act No. 36 of 1998)	S21 (a)(b) of NWA
Management: Air Quality Act (Act No. 39 of 2004)	S21
The National Heritage Resources Act (Act No. 25 of 1999)	-
Conservation of Agricultural Resources Act (Act No. 85 of 1983)	-
Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	-
National Infrastructure Plan	-
National Forests Acts, Act 84 of 1998	Chap 3 (Part 1) 1998 S12(1) S15(1) S58(1)
Department of Environmental and Nature Conservation	-
Department of Agriculture, Forestry and Fisheries	-
National Veld & Forest Fires Act (Act 101 of 1998)	-
Mamusa Local Municipality Integrated Development Plan (IDP)	-
Dr. Ruth Segomotsi Mompati District Municipality Integrated Development Plan (IDP)	-
National Environmental Management: Waste Act, (No. 59 of 2008) (NEM:WA)	-
Occupational Health and Safety Act as amended, (No.181 of 1993)	-

Policy and Legislative Context

Legislation/Policy	Description
The Convention of Biological Diversity (Rio de Janeiro, 1992).	The purpose of the Convention on Biological Diversity is to conserve the variability among living organisms, at all levels (including diversity between species, within species and of ecosystems). Primary objectives include (i) conserving biological diversity, (ii) using biological diversity in a sustainable manner and (iii) sharing the benefits of biological diversity fairly and equitably.
South African Constitution 108 of 1996	The Constitution is the supreme law of the land and includes the Bill of rights which is the cornerstone of democracy in South Africa and enshrines the rights of people in the country. It includes the right to an environment which is not harmful to human health or well-being and to have the environment protected for the benefit of present and future generations through reasonable legislative and other measures.
Strategic Framework for Sustainable Development in South Africa	The development of a broad framework for sustainable development was initiated to provide an overarching and guiding National Sustainable Development Strategy. The Draft Strategic Framework for Sustainable Development (SFSD) in South Africa (September 2006) is a goal orientated policy framework aimed at meeting the Millennium Development Goals. Biodiversity has been identified as one of the key crosscutting trends in the SFSD. The lack of sustainable practices in managing natural resources, climate change effects, loss of habitat and poor land management practices were raised as the main threats to biodiversity.

<p>National Environmental Management Act 107 of 1998</p>	<p>This is a fundamentally important piece of legislation and effectively promotes sustainable development and entrenches principles such as the 'precautionary approach', 'polluter pays' principle, and requires responsibility for impacts to be taken throughout the life cycle of a project NEMA provides the legislative backing (Including Impact Assessment Regulations) for regulating development and ensuring that a risk-averse and cautious approach is taken when making decisions about activities.</p>
<p>Environmental Impact Assessment (EIA) regulations</p>	<p>New regulations have been promulgated in terms of Chapter 5 of NEMA and were published on 08 December 2014 in Government Notice No. R. 985. Development and land use activities which require Environmental Authorisation in terms of the NEMA EIA Regulations, 2014, are in Listing Notice 3 (GG No. R.983, LN3) identified via geographic areas with the intention being that activities only require Environmental Authorisation when located within designated sensitive areas. These sensitive/geographic areas were identified and published for each of the nine (9) Provinces.</p>
<p>National Environmental Management: Biodiversity Act No 10 of 2004</p>	<p>The Biodiversity Act provides listing threatened or protected ecosystems, in one of four categories: Critically Endangered (CR), Endangered (EN), Vulnerable (VU) or Protected (Government Gazette, 2011). The main purpose of listing threatened ecosystems is to reduce the rate of ecosystem and species extinction and includes the prevention of further degradation and loss of structure, function and composition of threatened ecosystems.</p>
<p>Conservation of Agricultural Resources Act 43 of 1967</p>	<p>The intention of this Act is to control the over-utilization of South Africa's natural agricultural resources, and to promote the conservation of soil and water resources and natural vegetation. The CARA has categorised a large number of invasive plants together with associated obligations of the land owner, including the requirement to remove categorised invasive plants and taking measures to prevent further spread of alien plants.</p>

National Forest Act 84 of 1998	<p>The protection, sustainable management and use of forests and trees within South Africa are provided for under the National Forests Act (Act 84 of 1998).</p> <p>Prohibition on destruction of trees in natural forests</p> <p>(1) No person may -</p> <ul style="list-style-type: none">(a) cut, disturb, damage or destroy any indigenous tree in a natural forest; or(b) possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any tree, or any forest product derived from a tree contemplated in paragraph (a), except in terms of-<ul style="list-style-type: none">(i) a licence issued under subsection (4) or section 23; or(ii) an exemption from the provisions of this subsection published by the Minister in the <i>Gazette</i> on the advice of the Council.
National Environmental Management: Protected Areas Act 57 of 2003	<p>This Act provides for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes. It also seeks to provide for the sustainable utilization of protected areas and to promote participation of local communities in the management of protected areas.</p>

F. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES.

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

Prospecting rights and mining permits have been applied for all around the proposed site, and the outcome of that studies suggest the possibility of encountering further diamond deposits. Proof of previous prospecting/mining activities also occurred on site.

Prospecting as defined by the MPRDA: "intentionally searching for any mineral by means of any method - which disturbs the surface or subsurface of the earth, including any portion of the earth that is under the sea or under other water; or in or on any residue stockpile or residue deposit, in order to establish the existence of any mineral and to determine the extent and economic value thereof; or in the sea or other water on land" therefore Brakpan Trust applied for a prospecting right on the mentioned properties in order to determine the presence of diamonds, as expected, and to determine whether it will be feasible to enter into further studies.

The North West Province is an important supplier of rough diamonds to the international market and is a large corner stone of the South African economy.

G. Motivation for the preferred development footprint within the approved site including a full description of the process followed to reach the proposed development footprint within the approved site.

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

Location of the site

The location of the site is preferred due to the expected presence of shallow diamonds. Access will be obtained from a gravel road off the R504.

Preferred activity

The prospecting of diamonds alluvial & diamonds general is one of the optimum preferred activities for the site. The other is agricultural and the impact thereon should be limited. The shallow diamond deposits make the site ideal for alluvial diamond mining. The mine will provide additional job opportunities than what is providing currently.

Technology alternatives

In terms of the technologies proposed, these have been chosen based on the long term success of their prospecting history. The prospecting activities proposed in the Prospecting Works Programme (**Appendix 9**) is dependent on the preceding phase as previously discussed, therefore no alternatives are indicated, but rather a phased approach of trusted prospecting techniques.

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

- i. details of the development footprint alternatives considered;

The environmental impact assessment process also needs to consider if the development of an alluvial diamond mine would be the most appropriate land use for the particular site.

Prospecting of other commodities –from the surface and desktop assessment there are no indications that there are other commodities to be mined on the site, except alluvial diamond and diamonds general.

Agriculture – The proposed area is used for cattle and boer goat grazing.

- **Design and layout alternatives**

The location of activities will be determined based on the location of the prospecting activities, which will only be determined during phase 1 and 2 of the PWP. All the infrastructure will be temporary and/or mobile. The layout follows the limitations of the site and aspects such as, roads, site offices and workshop area as well as fencing– refer **Appendix 3**.

- **Operational alternatives**

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

The activities will commence with a site investigation and desktop studies, which will comprise of non-invasive techniques. This manner of survey will ensure that the applicant can clearly delineate areas which are suitable for further investigation and no unnecessary surface disturbance will be undertaken.

Based on the outcome of the desktop studies and site investigation, pits will be dug by an excavator for the purpose of soil sampling. If gravel is found, the applicant will determine the the composition and quality of the gravel.

The applicant will proceed with this way of prospecting by means of the open cast/trenching method, simultaneously or after pitting depending on the information obtained from the earlier work done. The trenches will be dug to remove and wash the gravel. It will be washed by a 10-foot washing pan to determine diamond proceeds per 100 tons of gravel.

All data will be consolidated and processed to determine the diamond bearing resources on the property. This will be a continuous process throughout the prospecting work programme.

No feasible alternatives to the pitting and trenching method currently exists. Impacts associated with the prospecting operations will be managed through the implementation of a management plan, developed as part of the application for authorisation.

- **No-go alternative**

This alternative considers the option of ‘do nothing’ and maintaining the status quo. The description provided in section H of this report could be considered the baseline conditions (status quo) to persist should the no-go alternative be preferred. The site is currently zoned for agricultural land uses. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for cattle and boer goat grazing.

The preferred technology for the proposed mining activity, will be to remove the diamond bearing gravel with an excavator, depositing it in the 10 – 18 feet rotary pan(s) to be washed and sorted. Please find the Prospecting Work Programme attached as **Appendix 9**.

Pros & Cons of the alternative **Dense Media Separation (DMS)**

Advantages	Disadvantages
DMS plants is used mostly for kimberlite deposits	10 times more expensive than Rotary pan
	Water consumption is high
	Operating costs are expensive

In a Dense Media Separation (DMS) plant, powdered ferrosilicon (an alloy of iron and silicone) is suspended in water to form a fluid near the density of diamond (3.52 g/cm³), to which the diamond bearing material is added to begin the separation process of the heavier minerals from the lighter material. Additional separation of the denser material occurs by centrifuge in “cyclones” that swirl the mixture at low and high speeds, forcing the diamonds and other dense minerals to the walls and then out the bottom of the cyclone. Waste water rises at the center of the cyclones and is sucked out and screened to remove waste particles. The DMS process results in a concentrate that generally weighs less than one percent of the original material fed into the plant at the beginning of the process.

Pros & Cons of the alternative **Rotary Pan Plants**

Advantages	Disadvantages
More cost effective	The industry perception that Rotary Pan Plants yield poorer diamond recoveries
Readily available	
Generate more work opportunities	
Consume less water	
Rotary Pan Plants are most often used when mining alluvial deposits	

In a Rotary Pan plant, crushed ore, when mining kimberlite, or alluvial gravel and soil is mixed with water to create a liquid slurry called “puddle” which has a density in the 1.3 to 1.5 g/cm³ range. The mix is stirred in the pan by angled rotating “teeth”. The heavier minerals, or “concentrate”, settle to the bottom and are pushed toward an extraction point, while lighter waste remains suspended and overflows out of the centre of the pan as a separate stream of material. The concentrate, representing just a small percentage of the original kimberlite ore or alluvial gravels, is drawn off for final recovery of the diamonds.

Both methods are in actual fact used for bulk material reduction and require a further process for the final diamond recovery however, for this project the Rotary Pan will be used.

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

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

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

ii. **Details of the Public Participation Process Followed**

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

Advertisement and Notices

1. Newspaper advertisement

An advertisement will be placed in English in the local newspaper (Stellalander newspaper) on **22 February 2017** (see Appendix 6) notifying the public of the EIA process and requesting Interested and Affected Parties (I&APs) to register with, and submit their comments to Milnex 189 CC. I&APs were given the opportunity to raise comments within 30 days of the advertisement.

2. Site notices

Site notices will be placed on site in English on the **01 March 2017** to inform surrounding communities and immediately adjacent landowners of the proposed development. I&APs were given the opportunity to raise comments. Photographic evidence of the site notices is included in **Appendix 6**. Below is a picture depicting where site notices were placed

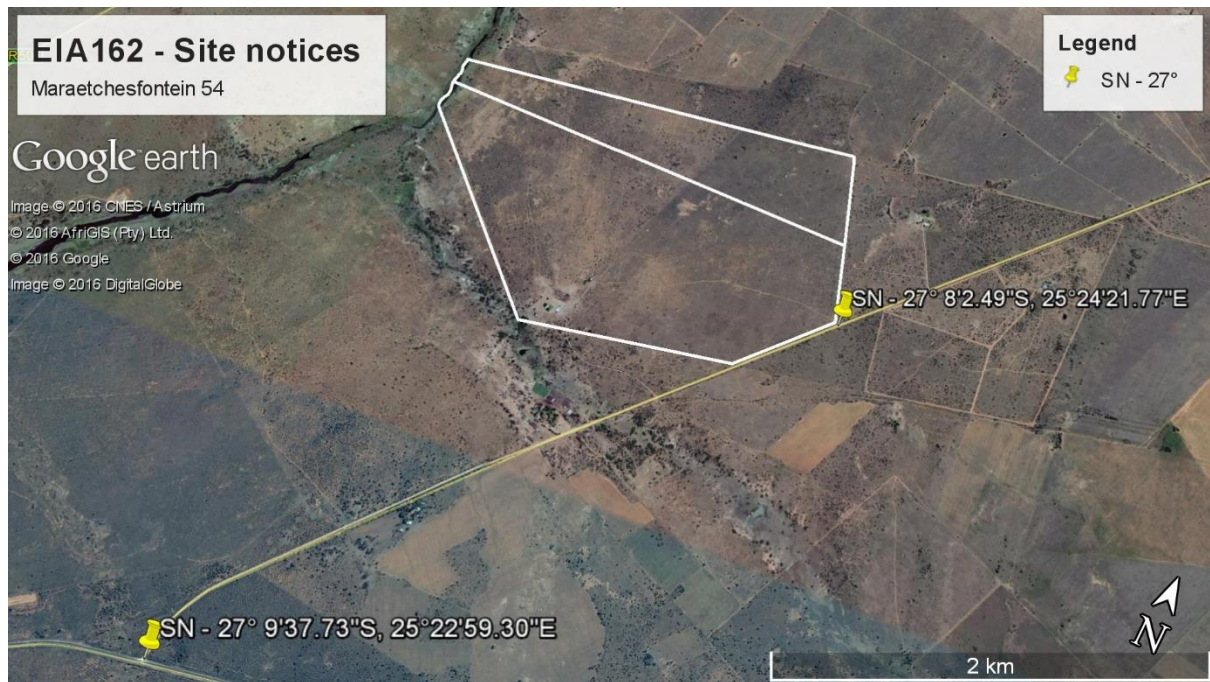


Figure 4: Site notice co-ordinates

3. Direct notification and circulation of Scoping Report to identified I&APs

Identified I&APs, including key stakeholders representing various sectors, are directly informed of the proposed development and the availability of the Scoping Report via registered post on **20 February 2017** and were requested to submit comments by **23 March 2017**. A copy of this report is also available at the Milnex offices in Schweizer-Reneke, 4 Botha Street, Schweizer-Reneke and Potchefstroom (Waterberry Street, Waterberry Square, 1st floor, Office 5B, Potchefstroom), between 7:30AM and 5PM, Monday to Thursdays and between 7:30AM and 4PM on Fridays. For a complete list of stakeholder details and for proof of registered post see **Appendix 6**. The consultees included:

- Department of Rural, Environmental and Agricultural Development
- Department of Water and Sanitation
- North West Department of Mineral Resources
- North West Department of Agriculture
- North West Department of Public Works, Roads and Transport
- North West Provincial Heritage Resources Authority
- North West Department of Agriculture and Forestry
- National Department of Agriculture, Forestry and Fisheries
- The Wildlife and Environment Society of South Africa (WESSA)
- Dr. Ruth Segomotsi Mompati District Municipality
- Municipal Manager at the Mamusa Local Municipality
- Local Councilor at the Mamusa Local Municipality

4. Direct notification of surrounding land owners and occupiers

Written notices and the availability of the Scoping Report are also provided to all surrounding land owners and occupiers on **20 February 2017**. The surrounding land owners are given the opportunity to raise comments by **23 March 2017**. For a list of surrounding land owners see **Appendix 6**.

5. Consultation

All I&AP's are invited to attend the public meeting scheduled for the **15th of March 2017 at 10:00am–11:00am** on the gravel road heading towards Migdol approximately 3.5km from the R504 at the coordinates mentioned below. The coordinates and directions (figure1) of the public meeting follows below.

Coordinates

27° 8'9.47"S

25°24'14.86"E

The public meeting is an opportunity to share information regarding the proposed development and provide I&APs with an opportunity to raise any issues and provide comments.

Directions to Public Meeting from Schweizer-Reneke

- Head out of Schweizer-Reneke towards Wolmaransstad on the R504 for approximately 5.8km
- After 5.8km turn left at the Klipspruit board onto the gravel road
- Continue on the gravel road for approximately 3.5km until where Milnex personnel will be waiting alongside the road



Figure 5: Directions from Douglas to the public meeting

The following key stakeholders and surrounding land owners are also directly informed of the public meeting via registered post 20 February 2017.

Table 1: List of Stakeholders, Land owners, & surrounding land owners

Stakeholders	Land owners	Surrounding Land owner
<ul style="list-style-type: none"> • Department of Rural, Environmental and Agricultural Development • Department of Water and Sanitation • North West Department of Mineral Resources • North West Department of Agriculture • North West Department of Public Works, Roads and Transport • North West Provincial Heritage Resources Authority • North West Department of Agriculture and Forestry • National Department of Agriculture, Forestry and Fisheries • Wildlife and Environment Society of South Africa (WESSA) • Dr. Ruth Segomotsi Mompati District Municipality • The Municipal Manager at the Mamusa Local Municipality • Local Councilor at the Mamusa Local Municipality • Wildlife and Environment Society of South Africa (WESSA) 	<ul style="list-style-type: none"> • Mr Hendrik Johannes Fouche 	<ul style="list-style-type: none"> • Mr. Pieter Renier Nieuwoudt • Mr. Jacobus Coenraad Lock • Mr. Abraham Johannes Stephanus Strauss • Welgenoeg Trust, Mrs. Johanna Dannhauser • Gawie Badenhorst Trust

6. Public Meeting

The stakeholders & interested and affected parties were informed about the proposed project with the use of site notices, press advertisement and registered letters.

Milnex representative Ms. Anica Nieuwoudt attended the meeting & no I&AP attended the meeting. Attached as **Appendix 6** is the attendance register for the meeting.

7. Direct notification and circulation of Environmental Impact Assessment (EIA) & Environmental Management Programme (EMPr)

Identified I&APs, including key stakeholders representing various sectors, land owners & surrounding land owners are directly informed of the proposed development and the availability of the Scoping Report via registered post on **15 May 2017** and were requested to submit comments by **14 June 2017**. A copy of the report is also available at the Milnex offices, Schweizer-Reneke and Potchefstroom, from 7:30 – 17:00, Monday to Friday. For a complete list of stakeholder details and for proof of registered post see **Appendix 6**. The consultees included people on table 1

8. Issues Raised by Interested and Affected Parties

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

iii. SUMMARY OF ISSUES RAISED BY I&APS

Interested and Affected Parties		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issue and or response where incorporated
List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.					
Organisation	Contact person				
Land Owner					
Maraetchesfontein RE/2/54 & 15/54	Mr Hendrik Johannes Fouche		No comments received		
Landowners or lawful occupiers on adjacent properties					
Maraetchesfontein 12/54	Mr. Pieter Renier Nieuwoudt		No comments received		
Maraetchesfontein 20/54	Mr. Jacobus Coenraad Lock	10/03/2017	Email correspondence on the 10/03/2017 at different times.		
			<u>09:55a.m.</u> Email received at with attached comments and response form, which states that Mr. Lock would like to receive project information via email and will not attend the public meeting.	<u>13:44p.m.</u> Email sent as confirmation that Milnex 189 CC received his email and gave him the dropbox link to follow for more project information.	
			<u>16:11p.m.</u> Email received states that Mr. Lock meant he only wanted project information that relates to him.	<u>15:46p.m.</u> Email sent with attached Draft Scoping Report.	
Lot 7 RE/49	Mr.Abraham Johannes Stephanus Strauss		No comments received		
Lot 7 2/49	Welgenoeg Trust Mrs. Johanna Dannhauser		No comments received		
Maraetchesfontein RE/54	Gawie Badenhorst Trust: To whom it may concern		No comments received		
The Municipality in which jurisdiction the development is located					

Mamusa Local Municipality	Municipal Manager: Mr Ruben Gincane		No comments received		
Municipal councillor of the ward in which the site is located					
Mamusa Local Municipality	Ward 7 Councilor		No comments received		
Organs of state having jurisdiction					
Department of Rural, Environmental and Agricultural Development, North West (READ)	Mrs. Eva Mahlangu	08/05/2017	Email received 08/05/2017 states that Mr. Mabula should be contacted in regards of comments for the proposed application	Email sent 08/05/2017 to Mrs. Eva to follow up on the requested comments on the proposed application.	
	Sammy Mabula	08/05/2017		Email sent 08/05/2017 to Mr. Mabula to follow up on the requested comments on the proposed application.	
		17/05/2017		Email sent 17/05/2017 to Mr. Mabula to follow up on the requested comments on the proposed application.	
		25/05/2017		Email sent 25/05/2017 to Mr. Mabula to follow up on the requested comments on the proposed application.	
The Department of Water & Sanitation (DWS)	Lindiwe Franks	04/04/2017		A CD with project information was posted via registered post on 04/04/2017.	
	Lindiwe Franks & P. Msimango	08/05/2017	Email received on 08/05/2017 acknowledged the email.	Email sent 08/05/2017 follows up with the department if they have any comments regarding this application and ask that they send their comments before or on the 23th of May 2017. Attached to the email was the Final Scoping Report, proof of CD with project information posted via registered post and letter sent to the department.	
		23/05/2017		Email sent 23/05/2017 follows up on the email sent on the 08/05/2017.	
	P. Msimango	24/05/2017	Email received on the 24/05/2017 with attached letter states the following:		

		<p>The area falls within the C31F quaternary catchment in the Lower Vaal Business Unit of the Vaal River Proto Catchment Management Agency. No application for water use licence application has been submitted as part of this project.</p> <p>2. Distance from the water course Please note that our Department rates all perennial and non-perennial rivers together with all dry river beds and natural drainage and associated riparian areas extremely sensitive to development. An option of developing furthest away from the all water course would be the preferred option.</p> <p>Please note that no development or prospecting should be done within 100 m or 1:100 year flood line of any water course and 500m of wetlands without authorisation from our Department. The water courses should be delineated in order to provide appropriate buffer to maintain such water course. The delineation should be done according to the appropriate Department of Water and Sanitation's delineation document.</p> <p>The construction camp shall not be located within the 1:100 year flood line or within 100 meters whatever is the greatest from any watercourse. Operation and storage of equipment within the riparian zone must be limited as far as possible.</p> <p>Vehicles and other machinery must be serviced well above the 1:100 year flood line or within a horizontal distance of 100 meters from any watercourse or estuary. Oils and other potential pollutants must be disposed off at an appropriate</p>		
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		<p>licensed site, with the necessary agreement from the owner of such a site.</p> <p>3. Storm Water management Any storm water must be diverted from the construction works and roads and must be managed in such a manner as to disperse runoff and to prevent the concentration of storm water flow. Where necessary, works must be constructed to attenuate the velocity of the storm water discharge and to protect the banks of the watercourse. Storm water control works must be constructed, operated and maintained in a sustainable manner throughout the project.</p> <p>Increased runoff due to vegetation clearance and/or soil compaction must be managed, and steps must be taken to ensure that storm water does not lead to bank instability and excessive levels of silt entering the watercourse. Storm water leaving the construction site must in no way be contaminated by any substance, whether such substance is a solid, liquid, vapour or gas or a combination thereof which is produced, used, stored, dumped or spilled on the premises.</p> <p>4. Invasive alien vegetation Vegetation must be monitored and managed on an on-going basis during construction and operation. Alien vegetation must not be allowed to further colonise the area, and all new alien vegetation recruitment must be eradicated or controlled, using standard methods approved by the Department.</p> <p>5. Design and layout of prospecting A detailed layout plan needs to be submitted to our Department showing all the facilities in the</p>		
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		<p>proposed development, distance from the any watercourses and bathroom facilities.</p> <p>Details of the final design must also be supplied as soon as a decision has been made, as the details of this factor may influence the environmental impact both during the construction and operational phases of the project.</p> <p>6. Construction Material with pollution generating potential must be limited in any construction activities. Any hazardous substances must be handled according to the relevant legislation relating to transport, storage and use of the substance.</p> <p>Any spillage of any hazardous materials including diesel that may occur during construction and operation must be reported immediately to our Department.</p> <p>7. Waste Management Rubbish bins and Enviro loose/mobile toilets must be there and enough for the people on site during construction. A letter of consent from a registered waste facility to allow contractor to empty the toilet facility at their sewer system should be submitted to our department.</p> <p>All sewage, grey and wash water, as well as any waste generated during the construction phase of the facilities will be collected, contained and disposed of at the permitted and / or licensed facilities of the Local Authority and this must please be confirmed in writing by the local authority.</p>		
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		<p>8. Rehabilitation Soils that have become compacted through the activities of the development must be loosened to an appropriate depth to allow seed germination. The necessary erosion prevention mechanisms must be employed to ensure the sustainability of all structures and activities and to prevent in-stream sedimentation. Rehabilitation remains the sole responsibility of the applicant and the Department.</p> <p>9. Water use entitlement The Department notes that the applicant has not submitted a request for a water use authorisation from our Department. Please be informed that engaging in water use activities is unlawful without necessary authorisation from our Department.</p> <p>10. Issues to take into consideration The applicant is to submit an EMP/EIA and it should take the following issues into consideration:</p> <p>a) Should the project continue; a site visit and pre consultation meeting must be conducted by a DWS official with the applicant, which will be followed by an application for Water Use Authorisation (proof of consultation and submission of an application). This must be submitted to DWS in terms of the National Water Act, 1998 (Act 36 of 1998) before any prospecting activities take place.</p> <p>11. Conclusion The Department therefore objects to this activity if the applicant has not provided proof of adherence to the above mentioned recommendations. This reply does not grant any</p>		
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			exemption from the requirements of any applicable Act, Ordinance, Regulation or By-law.		
NW Department of Agriculture (Dept. of Agric.)	Ms. Bonolo Mohlakoana		No comments received		
Provincial Heritage Resources Agency (PHRA) North West	Mr. Motlhabane Mosiane		No comments received		
South African Heritage Resources Agency (SAHRA)	Natasha Higgitt: Heritage Officer	02/05/2017	Letter dated 02/05/2017 states the following: a Heritage Impact Assessment must be conducted as part of the pending EIA before SAHRA can provide further comments.		
Department of Public Works, Roads and Transport in NW (DPWRT)	Director: Strategic Asset Management	17/07/2017	Letter date 17/07/2017 states that the department has noted the contents of the application and has no objections in this regard. The department has conducted a Deed Search on these properties and they are not registered.		
Department of Mineral Resources – North West (DMR)	Mr. Nephawe Mbavhalelo	20/02/2017	Mr. Nephawe Mbavhalelo called on the 20/02/2017 and asked that the locality map be emailed to him.	Ms. Percy Sehaole emailed Mr. Nephawe Mbavhalelo the locality map on 20/02/2017.	
	Mr. Pieter Swart	23/02/2017	Letter dated 23/02/2017 states that the application is acknowledged and it is assigned to Mr. Nephawe Mbavhalelo. Comment 5 states that this application is subject to the provisions of Chapter 2, Section 28 of the National Heritage Resources Act, Act 25 of 1999, then this Department will not be able to make nor issue a decision in terms of your application for Environmental Authorisation pending a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority as described in Chapter 2, Section 38.8 of the National Heritage Resources Act, Act 25 of 1999.	Proof of consulting with SAHRA on 30/03/2017.	

	Mr. Nephawe Mbavhalelo	26/04/2017 26/05/2017	<p>Letter dated 26/04/2017 states the acceptance of the submitted scoping report and the following:</p> <ul style="list-style-type: none"> a. Comments should be provided from consulted organs of state during the public participation process. b. The application falls within the Hartsriver, proof of consultation with DWS should be provided. <p>Please note that the EIR and EMP must be compiled in line with the guidelines, including the following:</p> <ul style="list-style-type: none"> a. Proof of consultation with the landowner and interested and affected parties. b. Provide final comments from PHRA stating that the application fulfils the requirements of the relevant heritage resources authority c. Conduct vegetation studies and Geo-hydrological studies. d. Undertake under oath or affirmation that all the information submitted or to be submitted for the purpose of the application is true and correct. 	Letter dated 26/05/2017 sent to DMR with attached proof of consultation with the DWS and READ.	
	Regional Manager	12/05/2017	<p>Letter dated 12/05/2017 states that the application has been accepted and the following.</p> <p>Milnex 189 CC are requested to consult with the landowner, lawful occupier and any interested and affected party and to submit online and hard copy to this office by not later than 04/08/2017, the following:</p> <ul style="list-style-type: none"> a. Duly signed shareholders agreements b. Share certificates and shareholder's registers c. Articles and memorandum of association of the company 		

			<p>d. Details relating to funding (all agreements) and</p> <p>e. Any other agreement or documents relating to the agreement.</p>		
	Mr. Nephawe Mbavhalelo	16/05/2017 25/05/2017	Letter dated 25/05/2017 states that timeframe extension has been granted in order to finalize specialist studies until 04/09/2017	Letter sent 16/05/2017 to Mr. Mbavhalelo request for timeframe extension until 4 September 2017.	
Department of Agriculture, Forestry (DAF)	Mr. Maurice Vugeya & Mrs Mpho Gumula		No comments received		
Department of Agriculture, Forestry, and Fisheries (DAFF)	To whom it may concern		No comments received		
Department of Rural development and Land reform	Land Claims Commissioner: Regional Offices, Chief Director: Mr Lengane Bogatsu	01/03/2017	Email received 01/03/2017 states that the require is receiving attention.	Email sent 01/03/2017 is proof of land claims consultation.	
	Norah Lebogang Lethuli	07/03/2017	Email received on 07/03/2017 with attached letter dated 06/03/2017 states that no claims appear on the North West database in respect of the properties. This include the database for claims lodged by 31st December 1998 and those lodged between 1 July 2014 and 27 July 2016 in terms of the Restitution of Land Rights Amendment Act , 2014.		
Other-					
Dr. Ruth Segomotsi Mompoti District Municipality	Municipal Manager: Zebo Tshetlho		No comments received		
WESSA	Phuti Mahloko	30/05/2017 12/06/2017	Email received on 30/05/2017 requesting project information.	Email sent 12/06/2017 apologises for only responding to the email now.	
		10/07/2017	Email received 10/07/2017 acknowledges receipt of the email and state they will send comments.	Email sent 10/07/2017 with draft EIR&EMPr attached and states Mr. Phuti can send us comments before or until 10 August 2017.	

iv. THE ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE SITES

Baseline Environment

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

Lawful occupiers

The landowner is Mr Hendrik Johannes Fouche, who is also the applicant.

Type of environment affected by the proposed activity.

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

Geology and Soils

From the geological map, the following geological information is obtained:

The Council for Geo Science describes the gravel found in the area under application as follows:

Ra: Tholeiitic and calc-alkaline basalt and andesite; tuff and pyroclastic breccia.

Classification

The allanridge formation underlies the Bothaville Formation conformably but where the latter pinches out the Allanridge verstemps onto diverse older lithologies.

The formation consists mainly of two types of lava, i.e. a dark-green amygdaloidal lava and light green-grey porphyritic lava.

Mineralogy

The dark-green lava, which is by far the most prominent unit in the Allanridge formation, also constitutes the greater part of the Ventersdorp supergroup in the area. The lava is fine to medium grained in texture and the plagioclase and augite in it have been replaced by secondary minerals, such as chlorite, eqidote, calcite sericite and uralite. The amygdales in the lava consist of quartz, chalcedony, calcite, chlorite or eqidote, or any combination of these minerals. Where more than one mineral makes up an amygdale, the minerals commonly form concentric zones.

Sedimentary Rocks

The sedimentary rocks of the Allanridge formation consist of a mixture of tuff, agglomerate and volcanic breccia occur interbedded with the lava towards the top of the formation

Ecological habitat and landscape features

It is noted that protected tree species under the National Forests Act No. 84 of 1998 are listed in Table 4.9. In terms of a part of section 15(1) of Act No. 84 of 1998, no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under a license granted by the Minister.

In cases where the trees will need to be cut, disturbed, damaged or destroyed or possessed, collected, removed, transported, exported, purchased, sold or donated a flora permit and/or NFA License will be applied

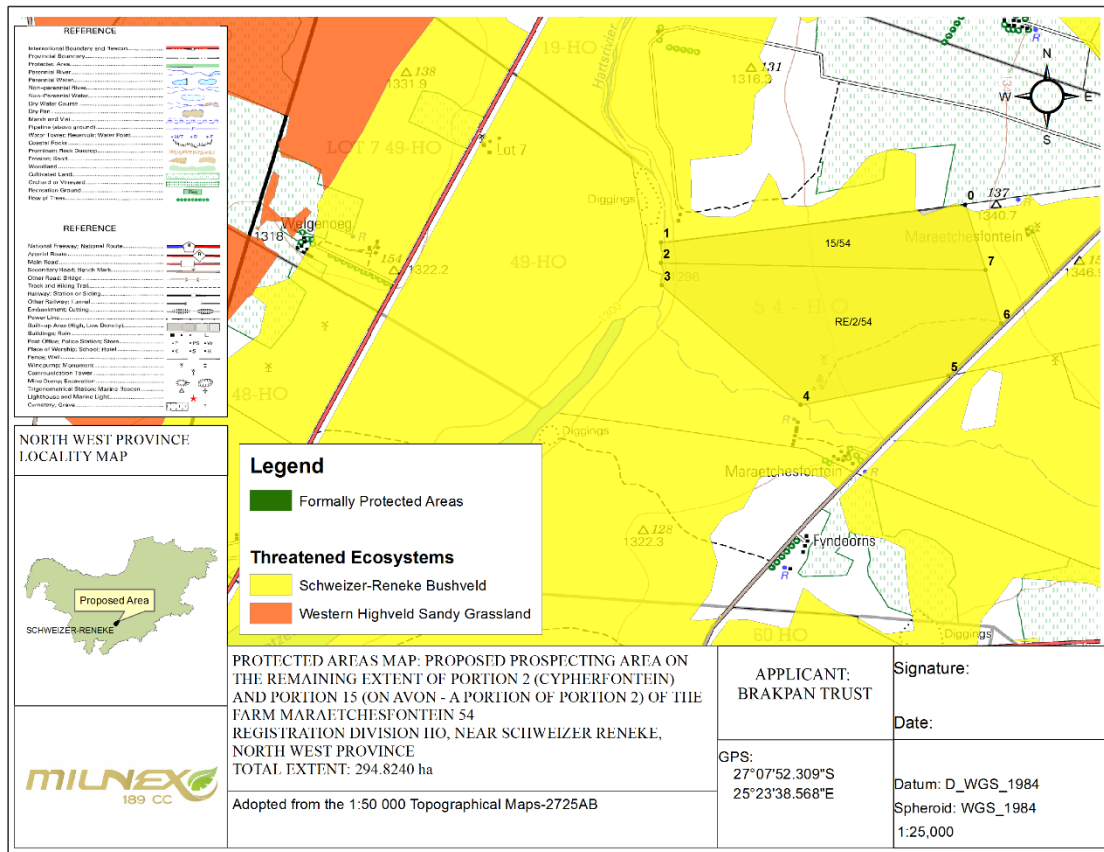


Figure 7: Protected Areas Map

Critical Biodiversity Area

According to READ (2015) “Critical biodiversity areas (CBAs) are terrestrial and aquatic areas of the landscape that need to be maintained in a natural or near-natural state in order to ensure the continued existence and functioning of species and ecosystems and the delivery of ecosystem services. In other words, if these areas are not maintained in a natural or near natural state then biodiversity targets cannot be met.

Maintaining an area in a natural state can include a variety of biodiversity compatible land uses and resource uses and can include one or more of the following: threatened ecosystems, special and important habitats, areas of high irreplaceability, ecological/biodiversity corridors, and existing or proposed protected areas and protected area development nodes. CBAs can be divided into two categories, namely: CBA 1 and CBA 2. READ (2015) also states that according to the extent of the CBA Map categories in the North-West Province, only 8% are CBA 1 and 20% are CBA 2.

According to the data for Critical Biodiversity Areas, areas of the proposed portions fall within CBA type 1 and type 2. The North West Biodiversity Sector Plan (2015) defined the management of the different CBA areas as follows:

Critical Biodiversity Area type 1

Maintain in a natural or near-natural state that maximises the retention of biodiversity pattern and ecological process:

- Ecosystems and species fully or largely intact and undisturbed.

Milnex 189 CC: EIA162 – EIR & EMP: Prospecting Right Application of Diamonds Alluvial & Diamonds General near Schweizer Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraatchesfontein 54, Registration Division: HO, North West Province.

- These are areas with high irreplaceability or low flexibility in terms of meeting biodiversity pattern targets. If the biodiversity features targeted in these areas are lost, then targets will not be met.
- These are biodiversity features that are at, or beyond, their limits of acceptable change.

Critical Biodiversity Area type 2

Maintain in a natural or near-natural state that maximises the retention of biodiversity pattern and ecological process:

- Ecosystems and species fully or largely intact and undisturbed.
- Areas with intermediate irreplaceability or some flexibility in terms of meeting biodiversity targets. There are options for loss of some components of biodiversity in these landscapes without compromising the ability to achieve biodiversity targets, although loss of these sites would require alternative sites to be added to the portfolio of CBAs.
- These are biodiversity features that are approaching but have not passed their limits of acceptable change

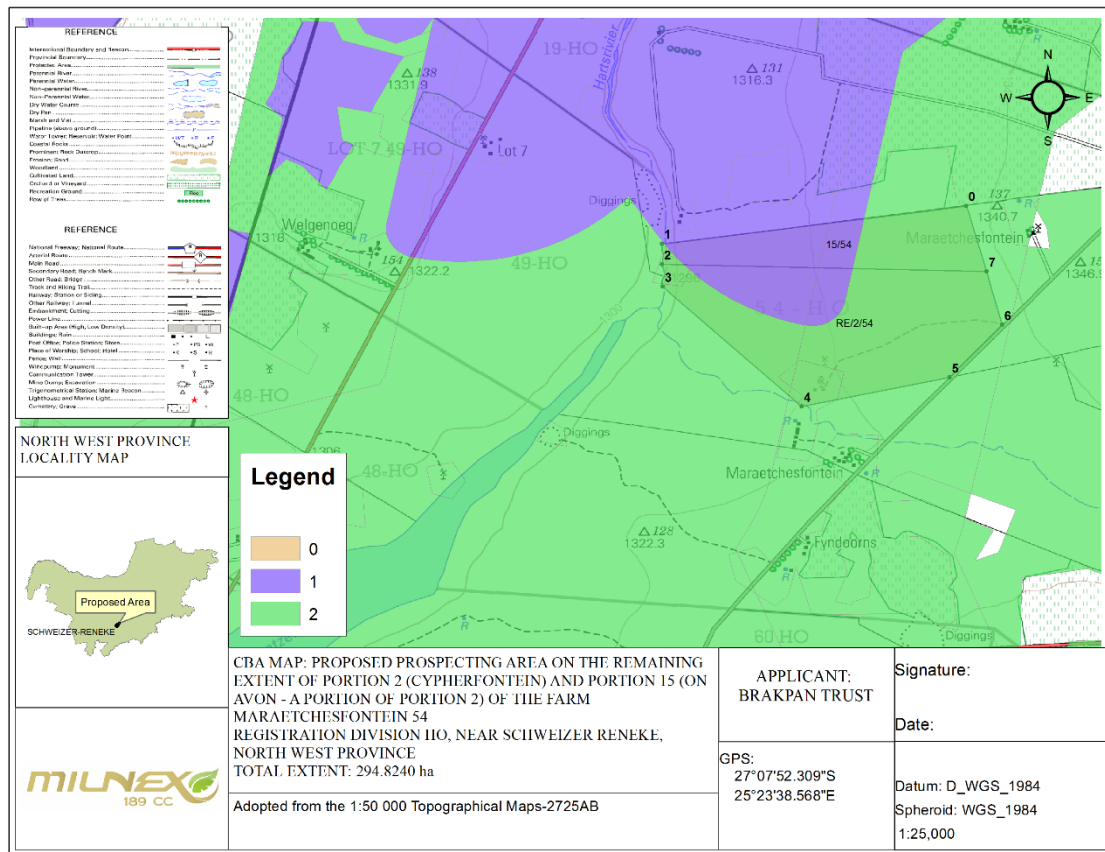


Figure 8: Critical Biodiversity Areas Map.

According to a matrix of recommended land use zones and associated activities in relation to the CBA map categories), prospecting is not permitted or it is discouraged in CBA type 1 areas. In CBA type 2 areas it is restricted to compulsory, site specific conditions and controls when unavoidable, not usually permitted

NO	LAND USE ZONE	ASSOCIATED LAND USE ACTIVITIES	PA/CA	CBA1	CBA2	ESA1	ESA2	ONA
15	Quarrying and Mining	Prospecting and Underground Mining	N	N	R	R	R	R
		Quarrying and open-cast mining (includes surface mining, dumping & dredging).	N	N	N	N	N	R
		Hydraulic Fracturing (fracking)	N	N	N	R	R	R

Notes:

1. Guidelines apply only to natural or near-natural land with natural vegetation cover within each category (on site).
2. Y = YES, permitted and actively encouraged activity;
3. N = NO, not permitted, actively discouraged activity; and,
4. R = RESTRICTED to compulsory, site-specific conditions & controls when unavoidable, not usually permitted.

(North West Biodiversity Sector Plan, 2015:57)

However, according to the Ecological Impact Assessment Report (Appendix 12) it was found that parts of the mapped CBA and NFEPA listed areas are highly degraded due to current and previous agriculture and mining activities. From an ecological perspective it is concluded that large parts of this project site has been transformed and that no protected species were found on the project site during this survey. In the already disturbed areas prospecting and / or mining may take place.

Sensitive area for Mine

According to the mine guide map, certain areas of the proposed portions fall within category B and C, which states the biodiversity priority areas for the different categories is as follows:

Category B (Highest risk for mining)

These areas are viewed as necessary to ensure protection of biodiversity, environmental sustainability, and human well-being.

Biodiversity priority areas:

- Critically endangered and endangered ecosystems
- Critical Biodiversity Areas (or equivalent areas) from provincial spatial biodiversity plans
- River and wetland Freshwater Ecosystem Priority Areas (FEPAs), and a 1km buffer around these FEPAs
- Ramsar Sites

Category C (High risk for mining)

These areas are important for conserving biodiversity, for supporting or buffering other biodiversity priority areas, for maintaining important ecosystem services for particular communities or the country as a whole.

Biodiversity priority areas:

- Protected area buffers (including buffers around National Parks, World Heritage Sites* and Nature Reserves).
- Transfrontier Conservation Areas (remaining areas outside of formally proclaimed protected areas).
- Other identified priorities from provincial spatial biodiversity plans.
- High water yield areas
- Coastal Protection Zone
- Estuarine functional zone

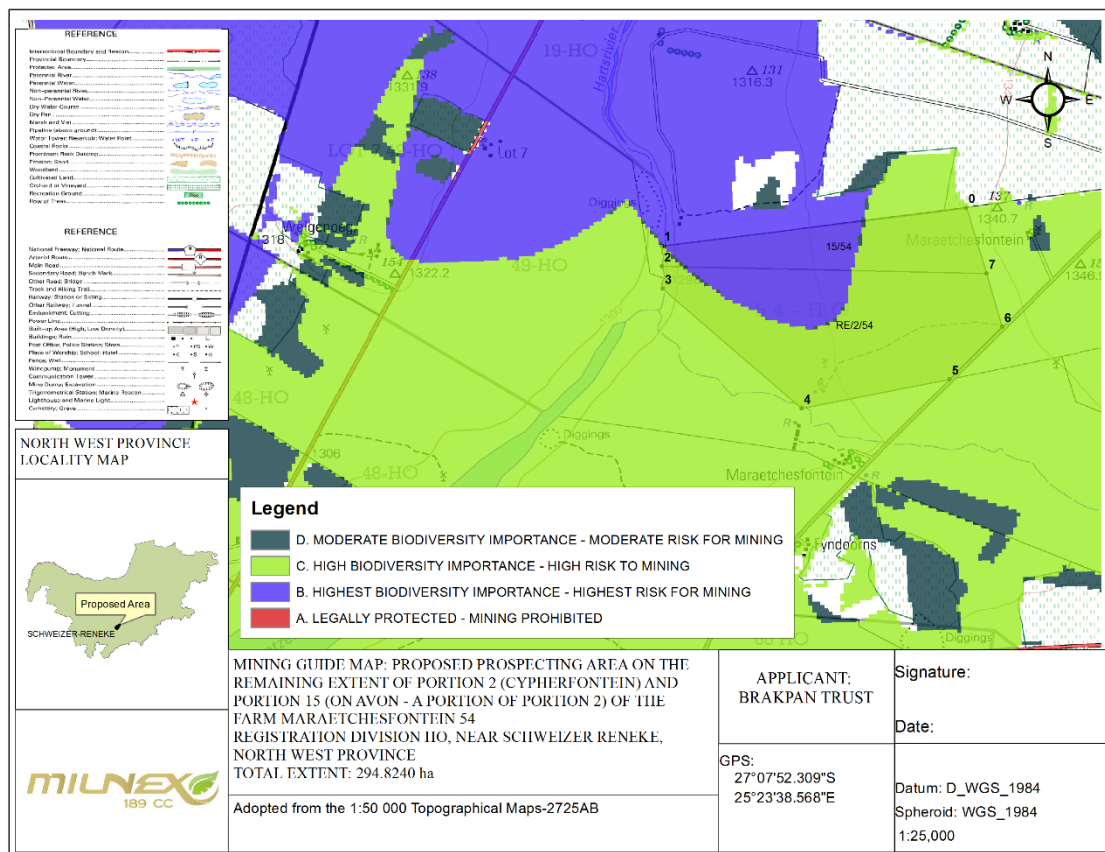


Figure 9: Sensitive area for mine

Wetland Areas

Wetland is defined as land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil (from the South African National Water Act; Act No. 36 of 1998).

Map below depicts all wetland areas on the proposed area. The proposed area consists of an channelled valley-bottom wetland and the wetland vegetation type falls within the Eastern Kalahari Bushveld Group 2.

According to the 2013 SANBI Biodiversity Series 22 a:

Channelled valley-bottom wetland is a valley-bottom wetland with a river channel running through it. It is characterised by their position on valley floors and the absence of characteristic floodplain features and the presence of a river channel flowing through the wetland. Dominant water inputs to these wetlands are from the river channel flowing through the wetland, either as surface flow resulting from flooding or as subsurface flow, and/or from adjacent valley-side slopes (as overland flow or interflow).

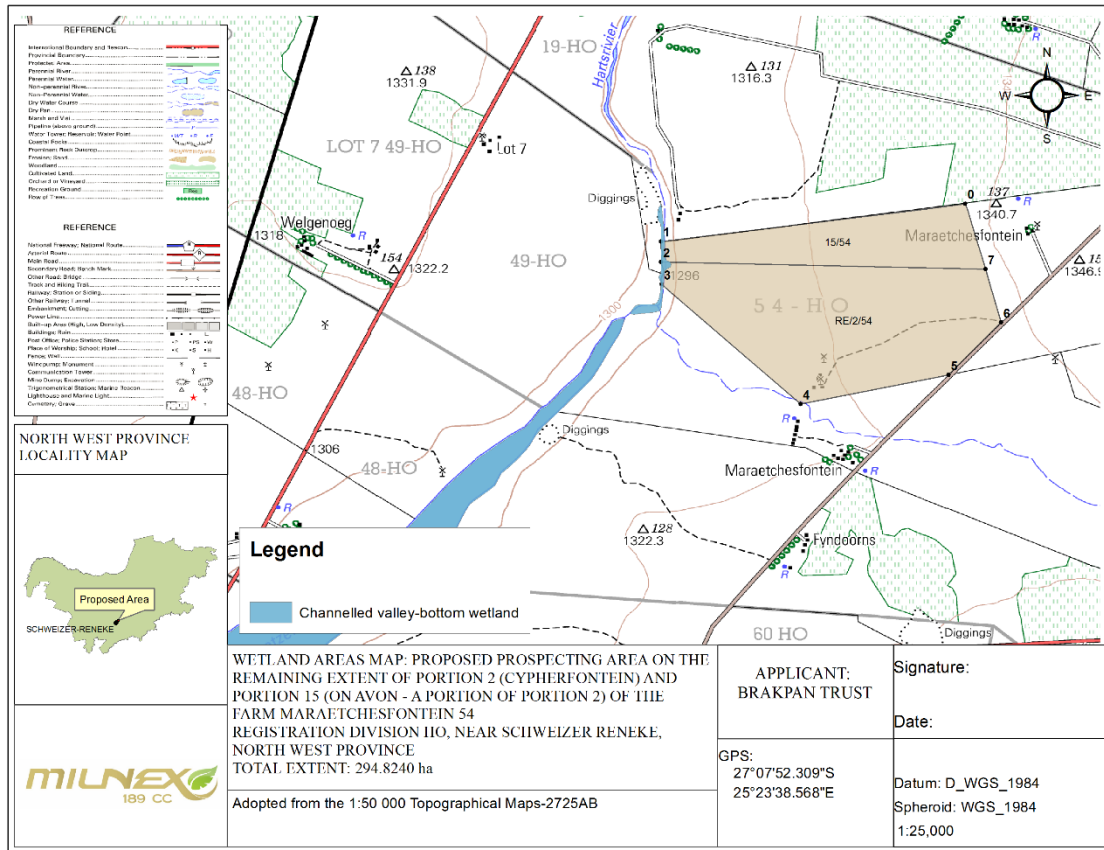


Figure 10: Wetland types present on site

According to the Ecological Impact Assessment Report (Appendix 12) there are a number of pans on and in the vicinity of the project site. These systems are all seasonal systems. The wetland and a protective buffer zone, beginning from the outer edge of the wetland temporary zone, must be designated as sensitive in a sensitivity map. The guidelines stipulate buffers to be delineated around the boundary of a wetland; the wetland and a protective buffer zone, beginning from the outer edge of the wetland temporary zone, must be designated as sensitive and a 30m buffer delineated around the edge of the wetland in which no development must be allowed to occur. In the case of the Harts River the buffer is 100m.

Milnex 189 CC: EIA162 – EIR & EMP: Prospecting Right Application of Diamonds Alluvial & Diamonds General near Schweizer-Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province.

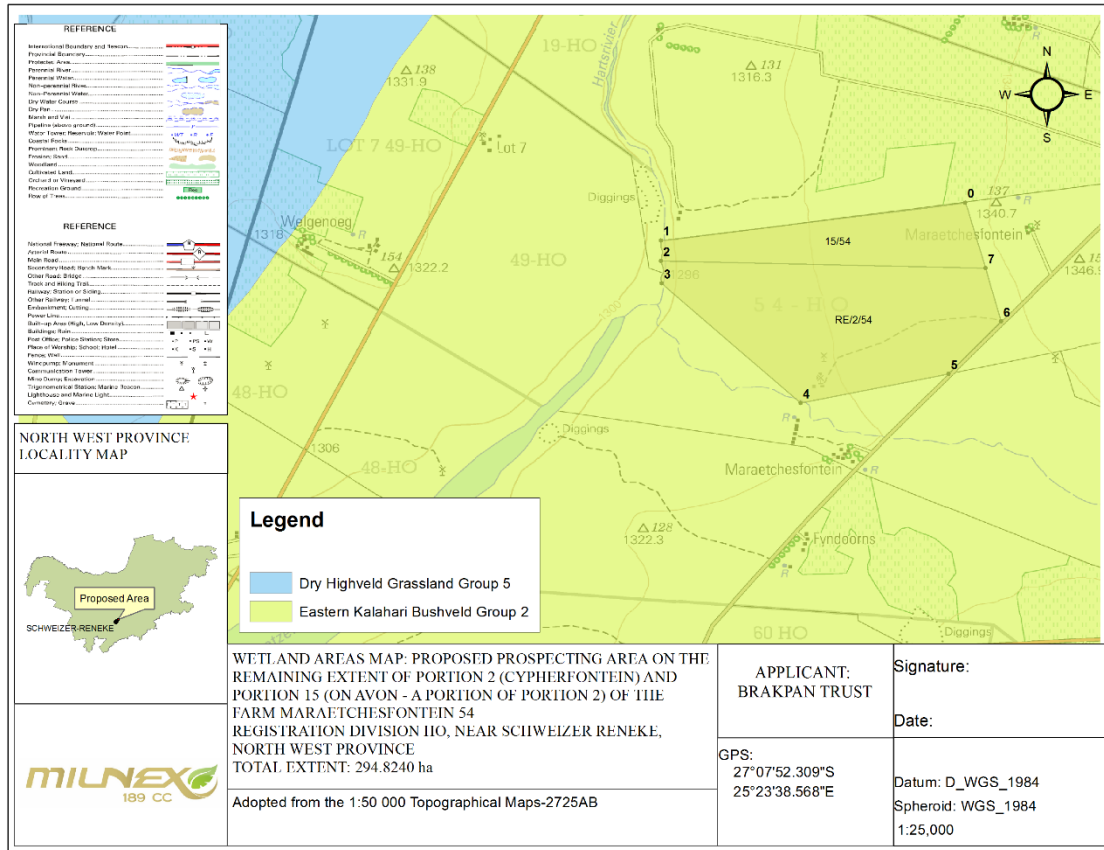


Figure 11: Wetland vegetation type

River Ecosystem Status

There is a watercourse running adjacent to the proposed site, which is classified as being Class C: Moderately Modified. The figure below depicts the river ecosystem status.

Milnex 189 CC: EIA162 – EIR & EMP: Prospecting Right Application of Diamonds Alluvial & Diamonds General near Schweizer-Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraatchesfontein 54, Registration Division: HO, North West Province.

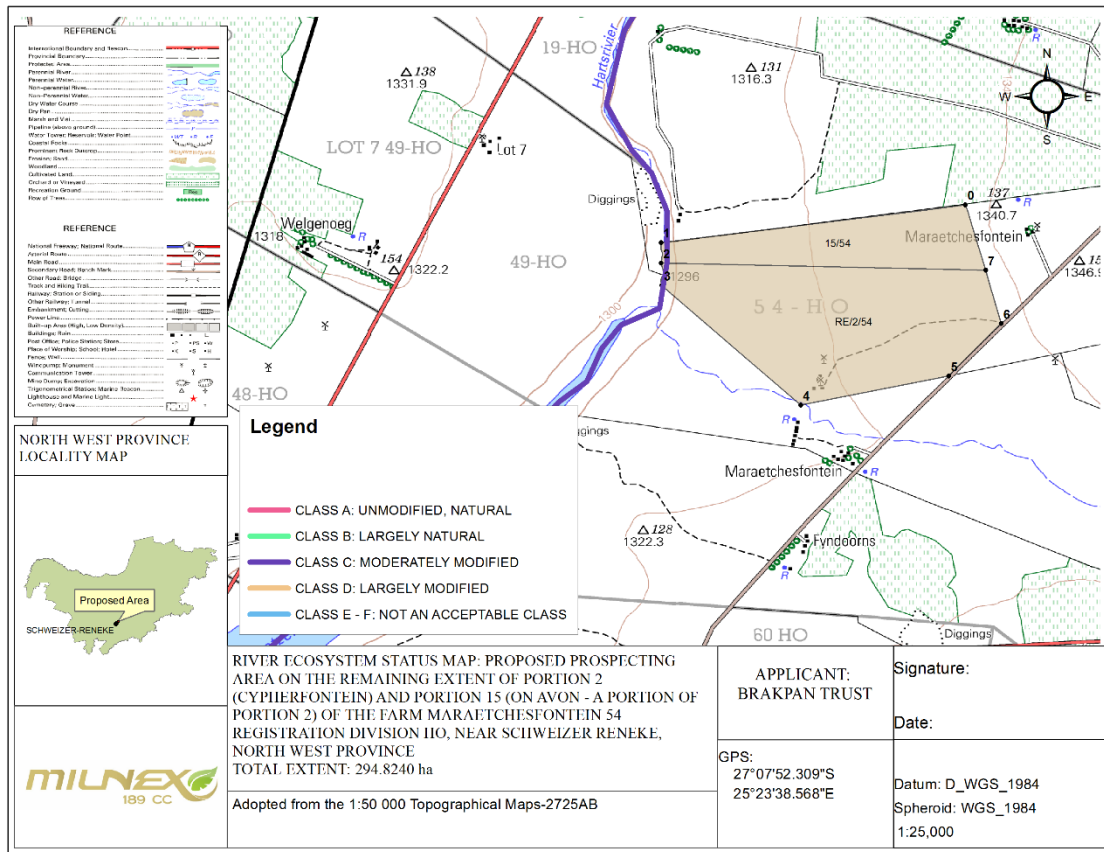
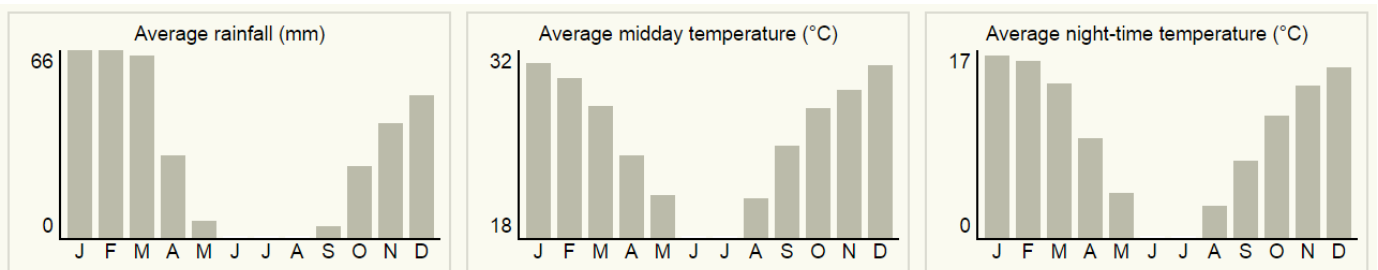


Figure 12: River Ecosystem Status

Land capability and agricultural potential

- Climate and water availability

Schweizer-Reneke normally receives about 350mm of rain per year, with most rainfall occurring mainly during summer. The chart below (lower left) shows the average rainfall values for Schweizer-Reneke per month. It receives the lowest rainfall (0mm) in June and the highest (66mm) in January. The monthly distribution of average daily maximum temperatures (centre chart below) shows that the average midday temperatures for Schweizer-reneke range from 18°C in June to 31°C in January. The region is the coldest during July when the mercury drops to 0°C on average during the night. Consult the chart below (lower right) for an indication of the monthly variation of average minimum daily temperatures. (SAexplorer:2014).



Description of the socio-economic environment

Socio-economic conditions

According to the 2014/1 Mamusa Local Municipality's IDP review the municipal area comprises a total area of 3 681 km². The land mass is 7.8% of the total area of the Dr. Ruth S Mompoti District Municipality. The administrative Centre of the municipality is in the rural area of Schweizer-Reneke situated on the banks of the Harts River and at the foot of Mamusa hills in the North-West Province. The town of Schweizer-Reneke is the only town in Mamusa Local Municipality and surrounded by agricultural farms. The municipal area covers the central part of the Southern District municipal area and neighbours the following municipalities: Lekwa-Teemane Local Municipality, Naledi Local Municipality and Greater Taung Local Municipality.

According to census 2011, The Mamusa municipality has a total population of 60 355, this however only contributes only 13% to the total population of the Dr. Ruth S Mompoti District Municipality which population totals at 463 815 people. The Global Insight survey 2009 indicated that the population was 48 465 within the Mamusa Local Municipality. The population of MLM is thus increasing and this could be attributed by migration of people from other surrounding local municipalities.

Statistic SA 2011 depicts that the Africans are in majority and constitute about 55195 people of the total population of Mamusa LM. The Whites population group is about 3330 of the total population of Mamusa LM, Coloureds constitute 1356 of the total population of Mamusa LM and the total number of Asians is 290 of the total population of Mamusa LM.

African gender groups dominate the demographic profile of the Mamusa LM. African females are in the majority at 47.4% of the population, followed by African males at 45.6%. White females are dominating at 2.2% compared to the coloureds females at 1.1%. The number of white males is lower at 2.1% and the coloureds males are currently at 0.2%. There is an increase in the Indian/ Asian population at 0.4% overall and this can be attributed to business opportunities within local sector.

According to the Water and Sanitation Backlog Study Report of 2007, the total number of households in MLM was 13,676 as compared to 14,968 from the 2001 census and 14,310 as reported by Census 2011 households.

The household structure is measured by the number of households and the average household size. The following describes the household structure. In total, there were 14,625 households in MLM. With a total population of 60355, this gives an average household size of 4.9, about 5 people per household.

The Gross Domestic measures the total number of goods and services produced in a region. The total Gross Domestic Product of MLM in 2009 was R948 461. Gross Domestic Products for Mamusa LM is highly depended on various sectors which include but not limited to Agriculture and hunting, Construction, wholesale, retail, sale and repairs of motor vehicles, restaurants, land and water transport, education, finance, real estates, health and social work and public administration activities. These are some of the sectors highlighted which contribute positively to the growth of Mamusa LM's GDP.

Cultural and heritage aspects

Heritage resources including archaeological and paleontological sites over 100 years old, graves older than 60 years, structure older than 60 years are protected by the National Heritage Resources Act no 25 of 1999. Therefore, if such resources are found during the prospecting or development activities, they will not be disturbed without a permit from the relevant heritage resource Authority, which means that before such sites are disturbed by development, the developer will ensure that a heritage impact assessment is done and the Provincial Heritage Resources Authority and SAHRA will be contacted immediately.

A Phase 1 Heritage Impact Assessment (Appendix 12) was conducted and made the findings:

The study area has been largely degraded by previous farming and mining activities (Fig. 4 & 5). A foot survey of the terrain revealed no evidence for the accumulation and preservation of intact fossil material within the superficial Quaternary sediments. The pedestrian survey revealed no indication of in situ Stone Age archaeological material. Three unifacially (x2) and bifacially (x1) trimmed Early Stone Age handaxes were recorded as isolated finds on the landscape (Fig. 6). There are also no indications of prehistoric structures or graves within the boundaries of the impact area. A historically significance building older than 60 years (GPS: S27° 8'20.19" E25°23'30.05") and two engraving localities were recorded near the western boundary of the study area (Figs. 7 – 9). Site 1 (GPS: S27°07'51.1" E25°22'53.8") is a rocky outcrop roughly 130 meters east of the Harts River (Fig. 10). At least ten individual boulders depict rock art. Rock engravings are made by pecking, scraping or incising into the rock surface. All imagery here was made by pecking. An upright stone at this site was used as a rubbing post by large mammals (particularly rhino) to get rid of skin parasites for many millennia. Such rubbing posts are common indicators of San rock art in the vicinity. Imagery at the site includes a black rhino, human figure, giraffe, zebra, hartebeest, possible eland and some indeterminate, seemingly unfinished images. Site 2 (GPS: S27°07'45.1" E25°22'51.0") is a single engraved boulder close to the eastern bank of the Harts River, about 40 meters from the water's edge (Fig. 10). The imagery is depicted on the side of the boulder, not on the top which is the common practice. At least two quadruped animals can be distinguished, but the intended species are unclear. Around these two images are groupings of numerous peck marks of varying density. Judging by the straight lines of the soil stains at the top surface of this boulder, it is likely that it was turned onto its side during mining activities in the more recent past. This boulder is situated only about 25 meters from old diggings; remnants of historical mining activities.

The farmstead and two rock engraving sites are assigned a field rating of Local Significance (conservation; mitigation not advised) (see Table 1). It is therefore advised that the engraving sites are fenced off and protected by a 10 meter wide no-go buffer zone. The remaining part of the proposed development footprint is assigned a field rating of Generally Protected C (low significance).

Description of the current land uses.

The site survey revealed that land cover on and in the immediate vicinity of the proposed area are essentially comprised of natural cover and to a lesser extent a waterbody. Below is the land cover of the farm.

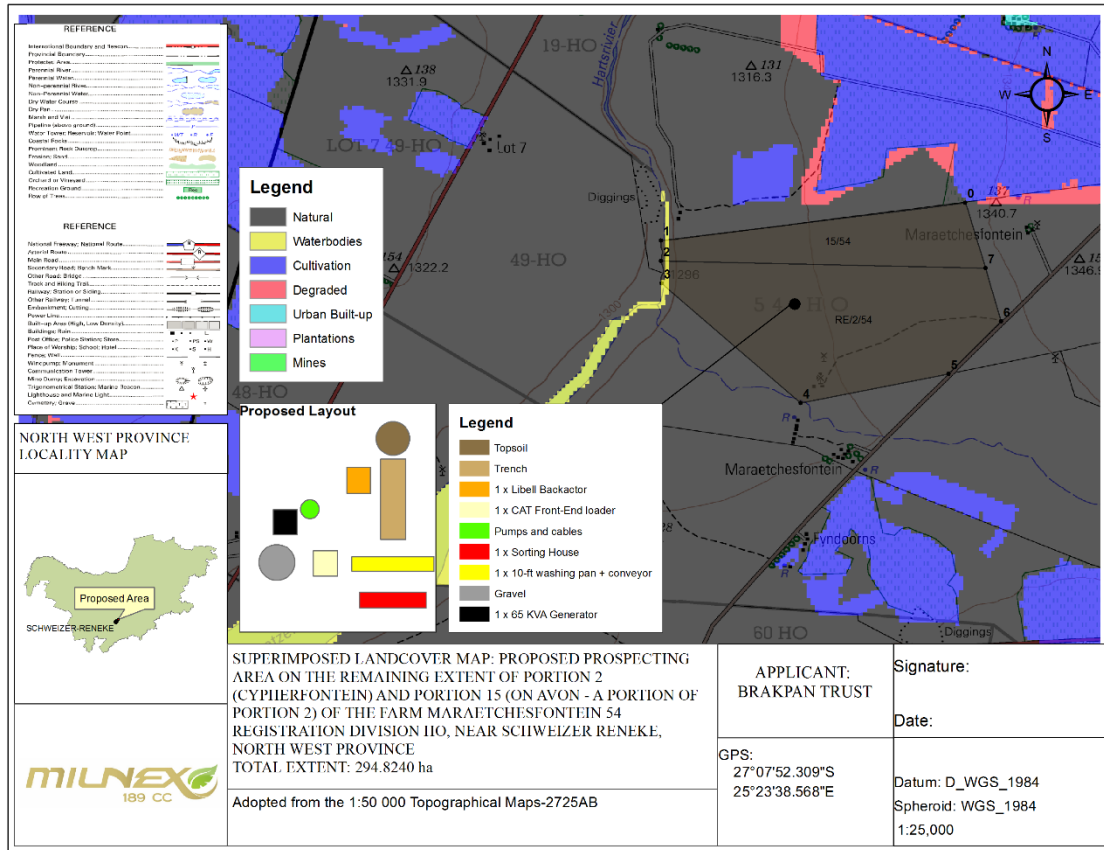


Figure 13: Land cover

v. IMPACTS AND RISKS IDENTIFIED INCLUDING THE NATURE, SIGNIFICANCE, CONSEQUENCE, EXTENT, DURATION AND PROBABILITY OF THE IMPACTS, INCLUDING THE DEGREE TO WHICH THESE IMPACTS

Significance of potential impacts

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

INITIAL CLEARANCE AND SITE PREPARATION PHASE

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

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

According to Mucina and Rutherford (2006:516), the Schweizer-Reneke Bushveld vegetation covers the North West Province. Schweizer-Reneke area in the east to Amalia in the west and from the farming areas

of around Broedersput in the north to Never Mind (Christiana District) in the south. This Bushveld is situated on an altitude of 1250m – 1400m.

The region is characterised by plains, slightly undulating plains and some hills, supporting open woodland with a fairly dense shrub layer, with *Acacia erioloba*, *A. karroo*, *A. tortilis*, *Rhus lancea* trees and *A. hebeclada*, *Diospyros lycioides*, *Grewia flava*, *Tarchonanthus camphoratus* shrubs.

Mucina and Rutherford (2006:516) also states that the conservation of this Bushveld type, is endangered with a target of 16%. None conserved in statutory conservation areas. Largely (42%) transformed almost all by cultivation. Erosion is very low.

Loss or fragmentation of indigenous natural fauna and flora	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impacts (3), since the pitting and trenching will only be 2.47ha at any given time in extent per year.	
Significance	Negative medium (30)	Negative low (28)
Can impacts be mitigated?	<p>If the development is approved, contractors must ensure that no mammalian species are disturbed, trapped, hunted or killed. If the development is approved, every effort should be made to confine the footprint to the blocks allocated for the development and have the least possible edge effects on the surrounding area. The EMP also provides numerous mitigation measures – refer to section (f) of the EMP.</p> <p>The potential impacts associated with damage to and loss of farmland should be effectively mitigated. The aspects that should be covered include:</p> <ul style="list-style-type: none"> • The site should be fenced off prior to commencement of construction activities; • The footprint associated with the construction related activities (access roads, construction platforms, workshop etc.) should be confined to the fenced off area and minimised where possible; • An Environmental Control Officer (ECO) should be appointed to monitor the establishment phase of the construction phase; • All areas disturbed by construction related activities, such as access roads on the site, construction platforms, workshop area etc., should be rehabilitated at the end of the construction phase; • The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s 	

	<p>appointed. Specifications for the rehabilitation are provided throughout the EMPr – section (f) of the EMPr.</p> <ul style="list-style-type: none"> The implementation of the Rehabilitation Programme should be monitored by the ECO.
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- Loss destruction or fragmentation of habitats – There is a high probability. It is noted that the proposed prospecting site is abutted by the Harts River

Loss or fragmentation of habitats	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	medium cumulative impacts (3)	
Significance	Negative low (42)	Negative low (28)
Can impacts be mitigated?	Exotic and invasive plant species should not be allowed to establish, if the development is approved. Where exotic and invasive plant species are found at the site continuous eradication should take place. If the development is approved, every effort should be made to confine the footprint to the blocks allocated for development – section (f) of the EMPr also provides numerous mitigation measures related to fauna and flora.	

- Loss of topsoil – Topsoil may be lost due to poor topsoil management (burial, erosion, etc.) during construction related soil profile disturbance (levelling, excavations, disposal of spoils from excavations etc.) The effect will be the loss of soil fertility on disturbed areas after rehabilitation. This will result in grazing and cultivation potential being lost.

Loss of topsoil	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Geographical extent	Site (1)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal (2)	Marginal (2)
Cumulative impact	Medium cumulative impacts (3)	
Significance	Negative medium (36)	Negative low (22)
Can impacts be mitigated?	<p>The following mitigation or management measures are provided:</p> <ul style="list-style-type: none"> If an activity will mechanically disturb below surface in any way, then any available topsoil 	

	<p>should first be stripped from the entire surface and stockpiled for re-spreading during rehabilitation.</p> <ul style="list-style-type: none"> • Topsoil stockpiles must be conserved against losses through erosion by establishing vegetation cover on them. • Dispose of all subsurface spoils from excavations where they will not impact on undisturbed land. • During rehabilitation, the stockpiled topsoil must be evenly spread over the entire disturbed surface. • Erosion must be controlled where necessary on top soiled areas. <p>Establish an effective record keeping system for each area where soil is disturbed for constructional purposes. These records should be included in environmental performance reports, and should include all the records below.</p> <ul style="list-style-type: none"> • Record the GPS coordinates of each area. • Record the date of topsoil stripping. • Record the GPS coordinates of where the topsoil is stockpiled. • Record the date of cessation of constructional (or operational) activities at the particular site. • Photograph the area on cessation of constructional activities. • Record date and depth of re-spreading of topsoil. • Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time. <p>Section (f) of the EMP also provide mitigation measures related to topsoil management.</p>
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- **Soil erosion** – Soil erosion due to alteration of the land surface run-off characteristics. Alteration of run-off characteristics may be caused by construction related land surface disturbance, vegetation removal and the establishment of roads. Erosion will cause loss and deterioration of soil resources. This will result in grazing and cultivation potential being lost.

Soil erosion	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Geographical extent	Site (1)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal (2)	Marginal (2)
Cumulative impact	Negligible cumulative impact (1).	
Significance	Negative low (20)	Negative low (18)

Can impacts be mitigated?	<p>The following mitigation or management measures are provided: Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion.</p> <p>Include periodical site inspection in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence any erosion on site or downstream – refer to section (f) of the EMPr..</p>
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- Temporary noise disturbance - Preparation activities will result in the generation of noise over a period of months. Sources of noise are likely to include vehicles, the use of machinery such as back actors and people working on the site. The noise impact is unlikely to be significant; but activities should be limited to normal working days and hours (6:00 – 18:00).

Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Definite (4)	Probable (3)
Duration	Short term (1)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	The impact would result in negligible to no cumulative effects (1).	
Significance	Negative low (20)	Negative low (9)
Can impacts be mitigated?	Yes, management actions related to noise pollution are included in section (f) of the EMPr.	

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

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local/district (2)	Local/district (2)
Probability	Definite (4)	Definite (4)
Duration	Short term (1)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Medium cumulative impact (3) - An additional demand for landfill space could result in significant cumulative	

	impacts if services become unstable or unavailable, which in turn would negatively impact on the local community.	
Significance	Negative medium (26)	Negative low (13)
Can impacts be mitigated?	Yes, it is therefore important that all management actions and mitigation measures included in section (f) of the EMP are implemented.	

- **Impacts on heritage objects** – Heritage resources including archaeological and paleontological sites over 100 years old, graves older than 60 years, structure older than 60 years are protected by the National Heritage Resources Act no 25 of 1999. The specialist assigned the farmstead and two rock engraving sites a field rating of Local Significance (conservation; mitigation not advised) (see Table 1). It is therefore advised that the engraving sites are fenced off and protected by a 10 meter wide no-go buffer zone.

Impacts on heritage objects	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Possible (2)	Possible (2)
Duration	Short term (1)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	Low cumulative impact (2). Should these impacts occur, there may be a cumulative impact on the preservation of heritage objects in the area.	
Significance	Negative low (24)	Negative low (12)
Can impacts be mitigated?	If archaeological sites or graves are exposed during construction work, it should immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made. Also refer to section (f) of the EMP.	

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

- **Increase in vehicle traffic** – The movement of heavy vehicles during the clearance of vegetation and topsoil has the potential to damage local farm roads and create dust and safety impacts for other road users in the area. Access will be obtained from gravel road off the R504. While the volume of traffic along this road is low, the movement of heavy vehicles along this road is likely to damage the road surface and impact on other road users. The contractor should be required to ensure that damage to the road is repaired periodically. The movement of additional heavy vehicle traffic is will add significantly to the current traffic load on the road. The impact on the R504 is therefore likely to be moderate.

Increase in vehicle traffic	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative

Extent	Local (2)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Short term (1)	Short term (1)
Magnitude	High (3)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Medium cumulative impact (3). If damage to roads is not repaired then this will affect the farming activities in the area and result in higher maintenance costs for vehicles of local farmers and other road users. The costs will be borne by road users who were no responsible for the damage.	
Significance	Negative medium impacts (33)	Negative low (11)
Can impacts be mitigated?	<p>The potential impacts associated with heavy vehicles can be effectively mitigated. The mitigation measures include:</p> <ul style="list-style-type: none"> • The contractor must ensure that damage caused by construction on the gravel road of the R504 is repaired. The costs associated with the repair must be borne by the contractor; • Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers; • All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits. <p>Also refer section (f) of the EMP. For mitigation measures related to traffic.</p>	

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

Risk to safety, livestock and farm infrastructure	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Short term (1)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Low cumulative effects (2), provided losses are compensated for.	
Significance	Negative low (20)	Negative low (11)
Can impacts be mitigated?	Key mitigation measures include:	

	<ul style="list-style-type: none"> • Brakpan Trust should enter into an agreement with the local farmers in the area whereby damages to farm property etc. during the construction phase will be compensated for. The agreement should be signed before the construction phase commences; • The construction area should be fenced off prior to the commencement of the construction phase. The movement of construction workers on the site should be confined to the fenced off area; • Contractors appointed by Brakpan Trust should provide daily transport for low and semi-skilled workers to and from the site. This would reduce the potential risk of trespassing on the remainder of the farm and adjacent properties; • Brakpan Trust should hold contractors liable for compensating farmers in full for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. This should be contained in the Code of Conduct to be signed between the proponent, the contractors and neighbouring landowners. The agreement should also cover loses and costs associated with fires caused by construction workers or construction related activities (see below); • The Environmental Management Programme (EMPr) should outline procedures for managing and storing waste on site, specifically plastic waste that poses a threat to livestock if ingested; • Contractors appointed Brakpan Trust must ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms. • Contractors appointed by Brakpan Trust must ensure that construction workers who are found guilty of trespassing, stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation; • The housing of construction workers on the site should be strictly limited to security personnel (if any).
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- Increased risk of veld fires - The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could in turn pose a threat to livestock, crops, wildlife and farmsteads in the area. In the process, farm infrastructure may also be damaged or destroyed and human lives threatened. The potential risk of grass fires was heightened by the windy conditions in the area, especially during the dry, windy winter months from May to October. In terms of potential mitigation measures, a fire-break should be constructed around the perimeter of the site

prior to the commencement of the construction phase. In addition, fire-fighting equipment should be provided on site during the construction phase.

Increased risk of veld fires	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Region (3)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Medium term (2)	Short term (1)
Magnitude	High (3)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Negligible cumulative effects (1), provided losses are compensated for.	
Significance	Negative medium (33)	Negative low (9)
Can impacts be mitigated?	<p>The mitigation measures include:</p> <ul style="list-style-type: none"> • A fire-break should be constructed around the perimeter of the site prior to the commencement of the construction phase; • Contractor should ensure that open fires on the site for cooking or heating are not allowed except in designated areas; • Contractor to ensure that construction related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include avoiding working in high wind conditions when the risk of fires is greater. In this regard special care should be taken during the high risk dry, windy winter months; • Contractor to provide adequate firefighting equipment on-site, including a fire fighting vehicle; • Contractor to provide fire-fighting training to selected construction staff; • No construction staff, with the exception of security staff, to be accommodated on site over night; • As per the conditions of the Code of Conduct, in the advent of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate farmers for any damage caused to their farms. The contractor should also compensate the firefighting costs borne by farmers and local authorities. 	

OPERATIONAL PHASE

Direct impacts: During the operational phase the study area will serve as an prospecting area and the impacts are generally associated with soil erosion, change in land use, impacts associated with the, increase in storm water runoff, increased consumption of water, visual intrusion, the generation of general

waste, leakage of hazardous materials, and the change in the sense of place. The operational phase will also have a direct positive impact through the provision of permanent employment opportunities and facilitating a positive economic growth. The abovementioned impacts are discussed in more detail below:

- **Soil erosion** – The largest risk factor for soil erosion will be during the operational phase when the prospecting activity ensues and soil is left bare until rehabilitation is initiated. Erosion will be localised within the site. This will ultimately lead to the irretrievable commitment of this resource. The measurable effect of reducing erosion by utilizing mitigation measures may reduce possible erosion significantly.

Soil erosion	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local/Regional (2)	Local/Regional (2)
Probability	Definite (4)	Unlikely (1)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impact (3). Should these impacts occur, there will be a cumulative impact on the air and water resources in the study area in terms of pollution.	
Significance	Negative High (51)	Negative Low (26)
Can impacts be mitigated?	Yes, to avoid soil erosion it will be a good practice to not remove all the vegetation at once but to only clear the area as it becomes necessary and to implement concurrent rehabilitation. Also refer to section (f) of the EMP.	

- **Change in land-use** – The use of the area for the operation of the prospecting activity will result in certain areas not being used for livestock grazing anymore. The impact on farm income due to the loss of grazing will be more than offset by the income from Brakpan Trust.

Change in land use	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impacts (3).	
Significance	Negative medium (32)	Negative medium (28)
Can impacts be mitigated?	The proponent should establish a Rehabilitation Fund to be used to rehabilitate the area once the proposed facility has been decommissioned. The fund should be funded by revenue generated during the operational phase of the project. The motivation for the establishment of a	

	<p>Rehabilitation Fund is based on the experience in the mining sector where many mines on closure have not set aside sufficient funds for closure and decommissioning.</p> <p>Also refer to section (f) of the EMP.</p>
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- Generation of alternative land use income – Income generated through the alluvial diamond mine will provide the farming enterprise with increased cash flow and rural livelihood, and thereby improve the financial sustainability of farming on site.

Generation of alternative land use income	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Geographical extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	Medium (2)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resources (1)	No loss of resources (1)
Cumulative impact	Low cumulative impact (2).	
Significance	Positive Low (24)	Positive Low (24)
Can impacts be mitigated?	No mitigation required.	

- Increase in storm water runoff – The development will potentially result in an increase in storm water run-off that needs to be managed to prevent soil erosion, especially where vegetation will be cleared. Not all the vegetation should be removed at once. Only the specific trench being excavated at the specific time should be cleared.

Increase in storm water runoff	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impact (3) - Should these impacts occur, there will be cumulative impacts on the wider area.	
Significance	Negative medium (28)	Negative low (12)
Can impacts be mitigated?	Yes. It is therefore important that all management actions and mitigation measures included in section (f) of the EMP are implemented to ensure that these impacts do not occur	

- Increased consumption of water - Approximately 10 000-17 000 liters of water per hour will be required for the washing of the gravel in the rotary per pan. The water will be sourced from groundwater sources.

Increased consumption of water	Pre-mitigation impact rating	Post mitigation impact rating
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Status (positive or negative)	Negative	Negative
Extent	Region (3)	Region (3)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	Medium (2)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Marginal loss of resources (2)	Marginal loss of resources (2)
Cumulative impact	High cumulative impacts (4) - An additional demand on water sources could result in a significant cumulative impact with regards to the availability of water.	
Significance	Negative high (60)	Negative medium (40)
Can impacts be mitigated?	Yes, management actions and mitigation measures related to the use of water are included in section (f) of the EMP.	

- Generation of waste – Approximately 15 Workers will be present on site from 6:00 – 18:00, Monday to Saturday. Sources of general waste will be waste food, packaging, paper, etc. General waste will be stored on the site and removed on a weekly basis by a contractor.

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	Low (1)	Low (1)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Medium cumulative impact (3) - An additional demand for landfill space could result in significant cumulative impacts with regards to the availability of landfill space.	
Significance	Negative low (15)	Negative low (15)
Can impacts be mitigated?	Yes, management actions related to waste management are included in section (f) of the EMP.	

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

Leakage of hazardous materials	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Unlikely (1)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	

Significance	Negative medium (36)	Negative low (22)
Can impacts be mitigated?	Yes. It is therefore important that all management actions and mitigation measures included in the section (f) of EMP are implemented to ensure that these impacts do not occur.	

- **Noise disturbance** - Prospecting activities will result in the generation of noise over a period of 3-5 years. Sources of noise are likely to include vehicles, the use of machinery such as backactors, rotary pans and people working on the site, as well as occasional blasting; but prospecting activities should be limited to normal working days and some Saturdays and hours (6:00 – 18:00).

Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Definite (4)	Probable (3)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	The impact would result in negligible to no cumulative effects (1).	
Significance	Negative low (22)	Negative low (10)
Can impacts be mitigated?	Yes, management actions related to noise pollution are included in section (f) of the EMP.	

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

- **Potential impact on tourism** – The tourism sector in the Mamusa Local Municipality is not well established. The impact of the proposed prospecting of diamond alluvial and diamonds general on the areas sense of place with mitigation is likely to be low. In addition, the site will be visible only from a gravel road off the R504. The impact of the proposed mine on the tourism potential of the area and the MLM is therefore likely to be low.

Potential impacts on tourism	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Unlikely (1)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Low (1)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	N/A	
Significance	Negative low (5)	Negative low (5)
Can impacts be mitigated?	No mitigation required	

DECOMMISSIONING PHASE (MINE CLOSURE AND REHABILITATION)

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

- Rehabilitation of the physical environment – The physical environment will benefit from the closure of the prospecting area since the site will be restored to its natural state.

Rehabilitation of the physical environment	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Extent	Site (1)	Site (1)
Probability	Probable (3)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	Low (1)	Medium (2)
Reversibility	N/A	N/A
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	
Significance	Negative low (8)	Negative low (18)
Can impacts be mitigated?	No mitigation measures required.	

- Loss of employment - Given the relatively large number of people employed during the operational phase, the decommissioning of the facility has the potential to have a negative social impact on the local community.

Loss of employment	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Possible (2)
Duration	Permanent (4)	Permanent (4)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	
Significance	Negative medium (36)	Negative low (24)
Can impacts be mitigated?	<p>The following mitigation measures are recommended:</p> <ul style="list-style-type: none"> • All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning; • Brakpan Trust should establish an Environmental Rehabilitation Trust Fund to cover the costs of decommissioning and rehabilitation of disturbed areas. 	

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

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

Method of environmental assessment

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

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

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

Impact Rating System

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

- Construction
- Operation
- Decommissioning

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

Table: *The rating system*

NATURE		
Include a brief description of the impact of environmental parameter being assessed in the context of the project. This criterion includes a brief written statement of the environmental aspect being impacted upon by a particular action or activity.		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.

2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may

		temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible and no mitigation measures exist.
IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.
4	High cumulative impact	The impact would result in significant cumulative effects
SIGNIFICANCE		
Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:		

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

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

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

- Increased ambient noise levels resulting from geophysics site fly-overs and increased traffic movement during all prospecting phases.
- Potential water and soil pollution impacts resulting from hydrocarbon spills and soil erosion which may impact on environmental resources utilized by communities, landowners and other stakeholders.
- Potential water and soil pollution impacts resulting from hydrocarbon spills and soil erosion which may impact on ecosystem functioning.
- Potential decrease in water levels due to abstraction.
- Increased vehicle activity with in the area resulting in the possible destruction and disturbance of fauna and flora.
- Poor access control to farms which may impact on cattle movement, breeding and grazing practices.
- Influx of persons (job seekers) to site as a result of increased activity and the possible resultant increase in opportunistic crime.
- Potential visual impacts caused by prospecting activities.

- Prospecting will be undertaken by specialist sub - contractors and it is not anticipated that employment opportunities for local and / or regional communities will result from the prospecting activities.
- Prospecting activities may result in localised visual impacts.

viii. THE POSSIBLE MITIGATION MEASURES THAT COULD BE APPLIED AND THE LEVEL OF RISK.

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

No adverse environmental or social impacts associated with the prospecting activity have been identified through the Scoping & EIR process. Mitigation measures as set out in the Environmental Management Programme (EMPr) attached in Part B must be implemented in order to minimise any potential impacts.

All comments received during the review period of the Scoping and EIR report, as well as response provided is captured and recorded within the Comments and Response Report and will be attached in the final EIR.

ix. MOTIVATION WHERE NO ALTERNATIVE SITES WERE CONSIDERED.

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. No other properties have been secured by Brakpan Trust in the Schweizer-Reneke area to potentially prospect for alluvial diamonds and diamonds general. From a local perspective the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province are preferred due to the sites underlying diamond & alluvial diamond bearing gravel, therefore there will be no other alternative (i.e. to facilitate the movement of machinery, equipment, infrastructure).

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

Design alternatives were considered throughout the planning and design phase (i.e. where is the rock bed located?). In this regard discussions on the design were held between the EAP and the developer. The layout follows the limitations of the site and aspects such as, roads, site offices and workshop area as well as fencing.

A. FULL DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS AND RISKS THE ACTIVITY WILL IMPOSE ON THE PREFERRED SITE (IN RESPECT OF THE FINAL SITE LAYOUT PLAN) THROUGH THE LIFE OF THE ACTIVITY.

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

Process for the identification of key issues

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

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

Checklist analysis

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

Table: Environmental checklist

QUESTION	YES	NO	Un-sure	Description
1. Are any of the following located on the site earmarked for the development?				
I. A river, stream, dam or wetland	X			According to the Ecological Impact Assessment Report there are a number of pans on and in the vicinity of the project site. These systems are all seasonal systems.
II. A conservation or open space area		X		None.
III. An area that is of cultural importance		X		According to the heritage specialist the proposed area is of no paleontological significance. The farmstead and two rock engraving sites are assigned a field rating of Local Significance (conservation; mitigation not advised) (see Table 1). It is therefore advised that the engraving sites are fenced off and protected by a 10 meter wide no-go buffer zone. The remaining part of the proposed development footprint is assigned a field rating of Generally Protected C (low significance).
IV. Site of geological significance		X		None.
V. Areas of outstanding natural beauty		X		
VI. Highly productive agricultural land			X	According to the land capability map the proposed portions fall within Class 4, which states it may be used for cultivating crops. However according to the landcover map the proposed area is naturally covered. The proposed area is used for cattle- and boer goat grazing
VII. Floodplain		X		None
VIII. Indigenous forest		X		None
IX. Grass land		X		None.
X. Bird nesting sites			X	
XI. Red data species		X		According to the Ecological Impact Assessment Report during the site assessment no protected trees were

XII. Tourist resort		×		None.
2. Will the project potentially result in potential?				
I. Removal of people		×		None.
II. Visual Impacts		×		The proposed portion is approximate 3.4km from the R504 on a gravel road. The visual impact will be managed by placing stockpiles on the boundaries closer to the road.
III. Noise pollution		×		The noise impact is unlikely to be significant.
IV. Construction of an access road		×		Access will be obtained from the gravel road off the R504 tar road.
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.		×		None.
VI. Accumulation of large workforce (>50 manual workers) into the site.		×		Approximately 15 employment opportunities will be created during the construction and operational phase of the project.
VII. Utilisation of significant volumes of local raw materials such as water, wood etc.	×			10 Ft washing pans which utilise approximately 11 000 L per hour each from which 30% is re-used.
VIII. Job creation	×			Approximately 15 employment opportunities will be created during the construction and operational phase of the project.
IX. Traffic generation		×		None.
X. Soil erosion		×		Only areas earmarked for prospecting will be cleared. The prospecting will be phased and the topsoil stockpiled separately. Concurrent rehabilitation will take place. The soil also has a low erosion potential.
XI. Installation of additional bulk telecommunication transmission lines or facilities		×		None.
3. Is the proposed project located near the following?				
I. A river, stream, dam or wetland	×			According to the topographical map the Harts River is adjacent the proposed portions and according to the wetland areas map this is also a Channelled valley-bottom wetland. According to the Ecological Impact Assessment Report a number of ephemeral pans are present in the region.
II. A conservation or open space area		×		None.
III. An area that is of cultural importance			×	
IV. A site of geological significance		×		None.
V. An area of outstanding natural beauty		×		Most of the area is covered in natural vegetation, however there are also degraded and cultivation land according to the landcover map.
VI. Highly productive agricultural land		×		According to the land capability map the area around the proposed portions fall within Class 4, which states its arable land.
VII. A tourist resort		×		None.
VIII. A formal or informal settlement		×		None.

Matrix analysis

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

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

- **Stressor:** Indicates the aspect of the proposed activity, which initiates and cause impacts on elements of the environment.
- **Receptor:** Highlights the recipient and most important components of the environment affected by the stressor.
- **Impacts:** Indicates the net result of the cause-effect between the stressor and receptor.
Impacts need to be mitigated to minimise the effect on the environment.
- **Mitigation:**

J. AN ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK

LISTED ACTIVITY (The Stressor)	ASPECTS OF THE DEVELOPMENT /ACTIVITY	POTENTIAL IMPACTS		SIGNIFICANCE AND MAGNITUDE OF POTENTIAL IMPACTS			MITIGATION OF POTENTIAL IMPACTS	SPECIALIST STUDIES / INFORMATION	
		Receptors	Impact description	Minor	Major	Duration	Possible Mitigation		
CONSTRUCTION PHASE									
<i>Listing Notice GNR 984, Activity 15: "The clearance of an area of 20 hectares or more, of indigenous vegetation."</i>	<u>Site clearing and preparation</u> Areas earmarked for prospecting will need to be cleared, topsoil will be stockpiled separately.	BIOPHYSICAL ENVIRONMENT	Fauna & Flora	<ul style="list-style-type: none"> Loss or fragmentation of indigenous natural vegetation. Loss of sensitive species. Loss or fragmentation of habitats. 		-	L	Yes	-
			Air	<ul style="list-style-type: none"> Air pollution due to the increase of traffic of construction vehicles. 	-		M	Yes	-
			Soil	<ul style="list-style-type: none"> Soil degradation, including erosion. Loss of topsoil. Disturbance of soils and existing land use (soil compaction). 		-	S	Yes	-
			Geology	<ul style="list-style-type: none"> It is not foreseen that the removal of indigenous vegetation will impact on the geology or vice versa. 	-		S	Yes	-
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that need to be accommodated at a licensed landfill site. Generation of sewage that need to be accommodated by the local sewage plant. 	-		S	Yes	-
			Ground water	<ul style="list-style-type: none"> Pollution due to construction vehicles. 	-		S	Yes	-
			Surface water	<ul style="list-style-type: none"> Increase in storm water run-off. Pollution of water sources due to soil erosion. Destruction of watercourses (pans/dams/streams). 		-	S	Yes	-
		SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> Job creation. Business opportunities. Skills development. 		+	S	Yes	-
			Visual landscape	<ul style="list-style-type: none"> Potential visual impact on residents of farmsteads and motorists in close proximity to proposed facility. 	-		L	Yes	-
			Traffic volumes	<ul style="list-style-type: none"> Increase in construction vehicles. 	-		S	Yes	-
			Health & Safety	<ul style="list-style-type: none"> Air/dust pollution. Road safety. Increased risk of veld fires. 		-	S	Yes	-

			Noise levels	<ul style="list-style-type: none"> The generation of noise as a result of construction vehicles, the use of machinery such as drills, excavators, rotary pans, dumper trucks and people working on the site. 			L	Yes	-	
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the proposed activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	Yes	-	
			Heritage resources	<ul style="list-style-type: none"> Removal or destruction of archaeological and/or paleontological sites. Removal or destruction of buildings, structures, places and equipment of cultural significance. Removal or destruction of graves, cemeteries and burial grounds. 			S	Yes	-	
<p><u>Listing Notice GNR 984, Activity 15:</u> "The clearance of an area of 20 hectares or more, of indigenous vegetation."</p>	<p><u>Site clearing and preparation</u> Areas earmarked for prospecting will need to be cleared, topsoil will be stockpiled separately. This will inevitably result in the removal of indigenous vegetation located on the site.</p>	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">BIOPHYSICAL ENVIRONMENT</p>	Fauna & Flora	<ul style="list-style-type: none"> Loss or fragmentation of indigenous natural vegetation. Loss of sensitive species. Loss or fragmentation of habitats. 	-		L	Yes	-	
			Air quality	<ul style="list-style-type: none"> Air pollution due to the increase of traffic. 	-		M	Yes	-	
			Soil	<ul style="list-style-type: none"> Soil degradation, including erosion. Disturbance of soils and existing land use (soil compaction). Loss of agricultural potential (low significance relative to agricultural potential of the site). 			M	Yes	-	
			Geology	<ul style="list-style-type: none"> It is not foreseen that the removal of indigenous vegetation will impact on the geology or vice versa. 	N/A	N/A	N/A	N/A	-	
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that need to be accommodated at a licensed landfill site. Generation of sewage that need to be accommodated by the local sewage plant. 	-		M	Yes	-	
			Ground water	<ul style="list-style-type: none"> Pollution due to construction vehicles. 	-		S	Yes	-	
			Surface water	<ul style="list-style-type: none"> Increase in storm water run-off. Pollution of water sources due to soil erosion. Destruction of watercourses (pans/dams/streams). 	-		M	Yes	-	
		<p style="writing-mode: vertical-rl; transform: rotate(180deg);">SOCIAL/ECONOMIC ENVIRONMENT</p>	Local unemployment rate	<ul style="list-style-type: none"> Job creation. Skills development. 			+	S	N/A	-
			Visual landscape	<ul style="list-style-type: none"> Potential visual impact on residents of farmsteads and motorists in close proximity to proposed facility due to dust. 	-		M	Yes	-	
			Traffic volumes	<ul style="list-style-type: none"> Increase in construction vehicles. 	-		S	Yes	-	

			Health & Safety	<ul style="list-style-type: none"> Air/dust pollution. Road safety. 	-			Yes	-
			Noise levels	<ul style="list-style-type: none"> The generation of noise as a result of construction vehicles, and people working on the site. 	-		M	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the proposed activity will not have an impact on tourism in the area. 	N/A	N/A	N/A	Yes	-
			Heritage resources	<ul style="list-style-type: none"> Removal or destruction of archaeological and/or paleontological sites. Removal or destruction of buildings, structures, places and equipment of cultural significance. Removal or destruction of graves, cemeteries and burial grounds. 	N/A	N/A	N/A	N/A	-
OPERATIONAL PHASE									
<p><u>Listing Notice GNR 984, Activity 19:</u> “The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resource4s Development Act (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>The key components of the proposed project are described below:</p> <ul style="list-style-type: none"> <u>Supporting Infrastructure</u> - A control facility with basic services such as water and electricity will be constructed on the site and will have an approximate footprint 50m² or less. Other supporting infrastructure includes a site office and workshop area. <u>Roads</u> – Access will be obtained from gravel road off the R504. <u>Fencing</u> - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. 	BIOPHYSICAL ENVIRONMENT	Fauna & Flora	<ul style="list-style-type: none"> Fragmentation of habitats. Establishment and spread of declared weeds and alien invader plants (operations). 	-		L	Yes	-
			Air quality	<ul style="list-style-type: none"> Air pollution due to the mining activity, crusher plant and transport of the gravel to the designated areas. 	N/A	N/A	N/A	N/A	-
			Soil	<ul style="list-style-type: none"> Soil degradation, including erosion. Disturbance of soils and existing land use (soil compaction). Loss of agricultural potential (low significance relative to agricultural potential of the site). 		-	L	Yes	-
			Geology	<ul style="list-style-type: none"> Collapsible soil. Seepage (shallow water table). Active soil (high soil heave). Erodible soil. The presence of undermined ground. Instability due to soluble rock. Steep slopes or areas of unstable natural slopes. Areas subject to seismic activity. Areas subject to flooding. 		-	S	Yes	-
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that need to be accommodated at a licensed landfill site. Generation of sewage that need to be accommodated by the municipal sewerage system and the local sewage plant. Increased consumption of water. Approximately 11 000 L per hour 		-	L	Yes	-
			Ground water	<ul style="list-style-type: none"> Leakage of hazardous materials. The machinery on site require oils and fuel to function. Leakage of these oils and fuels can contaminate water supplies. 	-		L	Yes	-
			Surface water	<ul style="list-style-type: none"> Increase in storm water runoff. The development will potentially result in an increase in storm water run-off that needs to be managed to prevent soil erosion. Destruction of watercourses (pans/dams/streams). 		-	L	Yes	-

				<ul style="list-style-type: none"> Leakage of hazardous materials. The machinery on site require oils and fuel to function. Leakage of these oils and fuels can contaminate water supplies. 					
		SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> Job creation. Security guards will be required for 24 hours every day of the week and general laborers will also be required for the cleaning of the panels. Skills development. 		+	L	Yes	-
			Visual landscape	<ul style="list-style-type: none"> The proposed portions are used for livestock grazing which will still take place simultaneously with the prospecting activity, however this depends on the location of the activity. 		-	L	Yes	-
			Traffic volumes	<ul style="list-style-type: none"> Increase in vehicles collecting gravel for distribution. 	-		S	Yes	-
			Health & Safety	<ul style="list-style-type: none"> Air/dust pollution. Road safety. 	N/A	N/A	N/A	N/A	-
			Noise levels	<ul style="list-style-type: none"> The proposed development will result in noise pollution during the operational phase. 	-	-	L	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the decommissioning activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	Yes	-
			Heritage resources	<ul style="list-style-type: none"> It is not foreseen that the proposed activity will impact on heritage resources or vice versa. 	N/A	N/A	N/A	N/A	-
DECOMMISSIONING PHASE									
-	<p><u>Mine closure</u> During the mine closure the Mine and its associated infrastructure will be dismantled.</p> <p><u>Rehabilitation of biophysical environment</u> The biophysical environment will be rehabilitated.</p>	BIOPHYSICAL ENVIRONMENT	Fauna & Flora	<ul style="list-style-type: none"> Re-vegetation of exposed soil surfaces to ensure no erosion in these areas. 	+		L	Yes	-
			Air quality	<ul style="list-style-type: none"> Air pollution due to the increase of traffic of construction vehicles. 	-		S	Yes	-
			Soil	<ul style="list-style-type: none"> Backfilling of all voids Placing of topsoil on backfill 	+		L	Yes	-
			Geology	<ul style="list-style-type: none"> It is not foreseen that the decommissioning phase will impact on the geology of the site or vice versa. 	N/A	N/A	N/A	N/A	-
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that need to be accommodated at the local landfill site. Generation of sewage that need to be accommodated by the municipal sewerage system and the local sewage plant. Increase in construction vehicles. 	-		S	Yes	-
			Ground water	<ul style="list-style-type: none"> Pollution due to construction vehicles. 	-		S	Yes	-
			Surface water	<ul style="list-style-type: none"> Increase in storm water run-off. Pollution of water sources due to soil erosion. Destruction of watercourses (pans/dams/streams). 	-		S	Yes	-
		SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> Loss of employment. 		-	L	Yes	-
			Visual landscape	<ul style="list-style-type: none"> Potential visual impact on visual receptors in close proximity to proposed facility. 	-		S	Yes	-
			Traffic volumes	<ul style="list-style-type: none"> Increase in construction vehicles. 	-		S	Yes	-

			Health & Safety	<ul style="list-style-type: none"> Air/dust pollution. Road safety. Increased crime levels. The presence of mine workers on the site may increase security risks associated with an increase in crime levels as a result of influx of people in the rural area. 	-			Yes	-
			Noise levels	<ul style="list-style-type: none"> The generation of noise as a result of construction vehicles, the use of machinery and people working on the site. 	-		S	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the decommissioning activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	Yes	-
			Heritage resources	<ul style="list-style-type: none"> It is not foreseen that the decommissioning phase will impact on any heritage resources. 	N/A	N/A	N/A	N/A	-

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

K. SUMMARY OF THE KEY FINDINGS OF THE ENVIRONMENTAL IMPACT ASSESSMENT

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

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X where applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED.
Ecological Impact Assessment Report	<p>The project site and the surrounding area were assessed for any sensitive ecosystems, including drainage lines and wetlands. It was found that large portions of the study area has been converted to crop fields and diamond diggings as well as farm steads. A number of ephemeral pans are present in the region. Several man-made excavations, the result of diamond mining activities are also present. The vegetation of the project site belongs to the Schweizer Reneke Thornveld (SVk 3) which has a conservation status of endangered. According to the North West Province’s Biodiversity sector Plan (2015) the project site is situated in a Critical Biodiversity Area (CBA1) and the site is also listed as part of the National threatened ecosystems and has a status as vulnerable.</p> <p>According to SANBI’s POSA species list some protected trees, Red Data and protected species, as listed in terms of the National Forest Act (Act 84 of 1998), the North West Province Conservation Act (Act 9 of 2009) and the National Threatened species list (SANBI 2016) might occur on the site. During the site assessment no protected trees were found on the project site.</p> <p>It was found that parts of the mapped CBA and NFEPA listed areas are highly degraded due to current and previous agriculture and mining activities. From an ecological perspective it is concluded that large parts of this project site has been transformed and</p>	X	<p>Dust – p.20, 49, 88, 89, 97, 110.</p> <p>Erosion – p.47, 53, 64, 87, 93, 96, 106, 109</p> <p>Appendix 11 - Management plan</p> <p>Weed control measures – p.90, 93, 94, 95, 107, 108.</p> <p>Appendix 7 - Protected trees and plants shall</p>

	<p>that no protected species were found on the project site during this survey. In the already disturbed areas prospecting and / or mining may take place.</p> <p>Recommendations:</p> <p><u>General</u></p> <ul style="list-style-type: none"> • An Environmental Control Officer (ECO) must be appointed to oversee that the aspects stipulated in the Environmental Permit be carried out properly; • Preconstruction environmental induction for all construction staff on site to ensure that basic environmental principles are adhered to; • The areas to be cleared as well as the construction area should be clearly demarcated; • All construction vehicles should adhere to clearly defined and demarcated roads; • Dust suppression and erosion management should be an integrated component of the construction approach; • No dumping of building waste or spoil material from the development should take place on areas other than a licenced landfill site; • All hazardous materials should be stored appropriately to prevent contamination of the project site. Any accidental chemical, fuel and oil spills that occur at the project site should be cleaned up appropriately as related to the nature of the spill; • In case is mining is going to take place in or within the 100m buffer zone of the Harts River, the mining equipment must be accommodated outside the 100m buffer zone to reduce the impact. <p><u>Flora</u></p> <ul style="list-style-type: none"> • Weed control measures must be applied to eradicate any noxious weeds (category 1a &1b species) on disturbed areas. • There should be a preconstruction walk-through of the development footprint/project site in order to locate individuals of plant species of conservation concern. Although no individuals of Camel Thorn or protected species could be located on the project site, a search and rescue exercise must be done to locate and relocate any protected species to a suitable and similar habitat where these plants can grow without any disturbance; • In case Camel Thorn or Shepherd’s trees are found permits must be obtained from DAFF to remove these individuals. The contractor must apply for these permits in a phased manner as mining proceeds. 		<p>not be removed or damaged without prior approval and permits or licenses from the relevant authority.</p> <p>Construction vehicles – p.50, 89, 91, 111</p>
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	<p>Fauna</p> <ul style="list-style-type: none"> Any fauna threatened by the construction and operation activities should be removed to safety by the ECO or appropriately qualified environmental officer. All construction vehicles should adhere to a low speed limit (<30km/h) to avoid collisions with susceptible species such as snakes and tortoises. Trenches and deep excavations should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are exposed should contain soil ramps allowing fauna to escape the trench. 		
<p>Hydrogeological Assessment</p>	<p>A desk study was performed to gather relevant geological and hydrogeological information. A hydro-census followed the desk study to establish borehole information in the region of the site. Information on nine boreholes could be gathered. The purpose of this survey was to gather relevant hydrogeological information to study the groundwater regime, current groundwater use and borehole coordinates in the area.</p> <p>The water demand on the groundwater aquifer for the proposed prospecting activities can be sustained from the farm portion boundary catchment area. The following conclusions, supporting the favourable outcome, could be made during the study:</p> <ul style="list-style-type: none"> The hydro-census data gives a broad picture that groundwater abstracted in the area is low. The water demand for the prospecting activities will be 68.5m³/d. The recommended abstraction rate from the one borehole BH 1 is 121m³/d. The groundwater recharge on the farm portion is 207.6m³/d. The delineated groundwater catchment area is 2 948 240m³ in extent. <p>Recommendations:</p> <ul style="list-style-type: none"> Groundwater must be abstracted at the recommended rate for borehole BH 1 that was submitted to borehole yield testing procedures. Use water sparingly as it is a scarce commodity. The groundwater monitoring as described in Section 7 in this report must be followed. Static water levels reaching five metres below the original static water level must be reported to the appointed hydrogeological consultant. 	<p>X</p>	<p>p.10, 75</p>
<p>Heritage Impact Assessment</p>	<p>The study area has been largely degraded by previous farming and mining activities (Fig. 4 & 5). A foot survey of the terrain revealed no evidence for the accumulation and preservation of intact fossil material within the superficial Quaternary sediments. The</p>	<p>X</p>	<p>p. 49, 63, 81</p>

	<p>pedestrian survey revealed no indication of in situ Stone Age archaeological material. Three unifacially (x2) and bifacially (x1) trimmed Early Stone Age handaxes were recorded as isolated finds on the landscape (Fig. 6). There are also no indications of prehistoric structures or graves within the boundaries of the impact area. A historically significance building older than 60 years (GPS: S27° 8'20.19" E25°23'30.05") and two engraving localities were recorded near the western boundary of the study area (Figs. 7 – 9). Site 1 (GPS: S27°07'51.1" E25°22'53.8") is a rocky outcrop roughly 130 meters east of the Harts River (Fig. 10). At least ten individual boulders depict rock art. Rock engravings are made by pecking, scraping or incising into the rock surface. All imagery here was made by pecking. An upright stone at this site was used as a rubbing post by large mammals (particularly rhino) to get rid of skin parasites for many millennia. Such rubbing posts are common indicators of San rock art in the vicinity. Imagery at the site includes a black rhino, human figure, giraffe, zebra, hartebeest, possible eland and some indeterminate, seemingly unfinished images. Site 2 (GPS: S27°07'45.1" E25°22'51.0") is a single engraved boulder close to the eastern bank of the Harts River, about 40 meters from the water's edge (Fig. 10). The imagery is depicted on the side of the boulder, not on the top which is the common practice. At least two quadruped animals can be distinguished, but the intended species are unclear. Around these two images are groupings of numerous peck marks of varying density. Judging by the straight lines of the soil stains at the top surface of this boulder, it is likely that it was turned onto its side during mining activities in the more recent past. This boulder is situated only about 25 meters from old diggings; remnants of historical mining activities.</p> <p>Recommendations: The affected area is underlain by intrusive volcanic rocks that are considered to be of no paleontological significance. It is highly unlikely that fossil remains will be encountered during excavation activities within the study area. There are no major palaeontological grounds to suspend excavation activities within the proposed development footprint. Due to the degraded condition of the terrain as a result of previous farming and mining activities, impact on potential <i>in situ</i> archaeological remains or historically significant structures within the study area is considered unlikely. The farmstead and two rock engraving sites are assigned a field rating of Local Significance (conservation; mitigation not advised) (see Table 1). It is therefore advised that the engraving sites are fenced off and protected by a 10 meter wide no-go buffer zone. The remaining part of the proposed development footprint is assigned a field rating of Generally Protected C (low significance).</p>		
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Specialist Report is attached as **Appendix 12**

L. ENVIRONMENTAL IMPACT STATEMENT

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

- Potential impacts on biodiversity: It is expected that some vegetation might be lost but through implementing mitigation measures, no adverse impacts are expected. It should be kept in mind that not the whole 294.824 ha will be cleared.
- Potential in groundwater amounts: Due to the water being abstracted from a borehole, groundwater resources will be depleted if not properly managed. The specific yield should be determined before abstraction continues. This will provide the applicant with the correct amount of water to be abstracted. If not determined, great implications will exist.
- Potential impacts on land use: The farm is currently utilised for livestock grazing. The activity which will be subject to concurrent rehabilitation may have an impact on the land use.
- Potential social impacts: The presence of construction workers poses a potential risk to family structures and social networks. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on local communities. The most significant negative impact is associated with the disruption of existing family structures and social networks.
- Potential negative impacts: (noise, dust, soil degradation, storm water, traffic, health and safety) associated with the operation of the facility are expected to be of low-high impact, of medium terms and site specific. These can be mitigated or negated through the implementation of practical and appropriate mitigation measures.
- Positive impacts: The prospecting of alluvial diamonds and diamonds general will have socio-economic benefit to the area.

All possible negative impacts and risks that have been identified in this report can be effectively mitigated and managed by implementing the migratory measures as set out in the Environmental Management Programme (EMPr) attached in Part B. It is therefore recommended that the environmental authorisation for the prospecting right be granted.

B. Final Site Map

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

Refer to Locality Map attached in **Appendix 4**.

C. Summary of the positive and negative implications and risks of the proposed activity and identified alternatives

- Increased noise levels
- Potential water and soil pollution impacts.

- Potential loss of fauna and flora.
- Increased vehicle activity.
- Increased dust levels.
- Increase in water consumption and possible depletion of groundwater resources.
- Potential visual impacts.

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

M. PROPOSED IMPACT MANAGEMENT OBJECTIVES AND THE IMPACT MANAGEMENT OUTCOMES FOR INCLUSION IN THE EMPr (Based on the assessment and where applicable the recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation)

Management objectives include:

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

Expected outcomes include:

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

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

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. Due to the expected mineral resources, Brakpan Trust would like to potentially prospect for Diamonds Alluvial & Diamonds General near Schweizer-Reneke on the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province therefore there will be no other alternative (i.e. to facilitate the movement of machinery, equipment, infrastructure).

O. ASPECTS FOR INCLUSION AS CONDITIONS OF AUTHORISATION.

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

- The operational activities and relevant rehabilitation of disturbed areas should be monitored against the improved EMPr and all other relevant environmental legislation.

- A copy of the EMP should be made available onsite at all times.
- Implementation of the proposed mitigation measures set out in the EMP.

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

The uncertainties in results are mostly related to the availability of information, time available to gather the relevant information as well as the sometimes-subjective nature of the assessment methodology. In terms of addressing the key issues the EAP is satisfied that there is sufficient information to conduct the significance rating and provide the environmental authority with sufficient information to make an informed decision. Specialists' studies were conducted for this applicant.

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

Reasons why the activity should be authorized or not.

Based on the outcomes of other diamond mines in the area the possibility to encounter further Diamond Reserves were identified.

The proposed prospecting area is targeted as, historically, several alluvial diamonds and diamond general occurrences are known in the area, and a number of these have been exploited in the past. There are also various alluvial diamond operations within the vicinity of the prospecting area.

No other properties have been secured by the applicant and the site is therefore regarded as the preferred site, and alternatives are not considered.

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

R. CONDITIONS THAT MUST BE INCLUDED IN THE AUTHORISATION

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

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

Period for which the Environmental Authorisation is required.

For a minimum of 10 years.

D. UNDERTAKING

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

The undertaking required to meet the requirements of this section is provided at the end of the EMP and is applicable to both the Environmental Impact Assessment report and the Environmental Management Programme report.

I, **Lizanne Esterhuizen** (EAP) herewith confirms

- A. the correctness of the information provided in the reports
- B. the inclusion of comments and inputs from stakeholders and I&APs ;
- C. the inclusion of inputs and recommendations from the specialist reports where relevant; and
- D. the acceptability of the project in relation to the finding of the assessment and level of mitigation proposed;



Signature of the environmental assessment practitioner:

Milnex 189 CC – Environmental Consultants

Name of company:

04 – 09 - 2017

Date:

T. FINANCIAL PROVISION

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

CALCULATION OF THE QUANTUM

Applicant: Brakpan Trust
 Evaluator:

Ref No.: NW30/5/1/1/2/12057PR
 Date: 04/09/2017

No.	Description	Unit	A	B	C	D	E=A*B*C*D
			Quantity	Master Rate	Multiplication factor	Weighting factor 1	Amount (Rands)
1	Dismantling of processing plant and related structures	m3	150	13,7	1	1	2055
2 (A)	Demolition of steel buildings and structures	m2		190,3	1	1	0
2(B)	Demolition of reinforced concrete buildings and structures	m2	0	280,46	1	1	0
3	Rehabilitation of access roads	m2	0	34,05	1	1	0
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	330,5	1	1	0
4 (A)	Demolition and rehabilitation of non-electrified railway lines	m	0	180,3	1	1	0
5	Demolition of housing and/or administration facilities	m2	0	380,6	1	1	0
6	Opencast rehabilitation including final voids and ramps	ha	0,26	193716,3	0,52	1	26190,44376
7	Sealing of shaft adits and inclines	m3	0	102,17	1	1	0
8 (A)	Rehabilitation of overburden and spoils	ha	0,1	133017,19	1	1	13301,719
8 (B)	Rehabilitation of processing waste deposits and evaporation ponds (non-polluting potential)	ha	0,1	165670,5	1	1	16567,05
8 (C)	Rehabilitation of processing waste deposits and evaporation ponds (polluting potential)	ha	0	481185,7	1	1	0
9	Rehabilitation of subsided areas	ha	0	111381,9	1	1	0
10	General surface rehabilitation	ha	0,01	105372,05	1	1	1053,7205
11	River diversions	ha	0	105372,05	1	1	0
12	Fencing	m	20	120,2	1	1	2404
13	Water management	ha	0	40065,4	1	1	0
14	2 to 3 years of maintenance and aftercare	ha	0,05	14022,9	1	1	701,145
15 (A)	Specialist study	Sum				1	0
15 (B)	Specialist study	Sum				1	0
Sub Total 1							62273,07826

1	Preliminary and General	7472,769391	weighting factor 2	7472,769391
			1	
2	Contingencies	6227,307826		6227,307826
Subtotal 2				75973,16
VAT (14%)				10636,24
Grand Total				86609

It is envisaged that 100 pits will be dug. It may be less depending on results.

294.824 ha- 3m x 2m x 5m pit (100 pits). It is planned that only 100 pits will be excavated in the first year, but it may be more if the process is quicker than planned for. It should be kept in mind that no more than 100 pits will be excavated. The total area to be disturbed a year will be- 100 pits x (3m x 2m) = 0.06ha per year

294.824 ha- 20m x 20m x 3m trench (60 Trenches). It is planned that only 5 trenches will be excavated in the first year to determine the feasibility of the resource, **if more trenches are planned the revised quantum will be submitted to the department.** It should be kept in mind that no more than 60 trenches will be excavated.

The total area to be disturbed a year will be- 5 trenches x (20m x 20m) = 0.2ha per year. No more than 0.26 ha will be left as un-rehabilitated in two years. Rehabilitation will be done concurrently.

A. Explain how the aforesaid amount was derived.

The closure cost estimate provided above is aligned with the Guideline Document for the Evaluation of Quantum of Closure related Financial Provision Provided by a Mine, by the DMR (January, 2005). The amount was calculated by Milnex 189 CC.

- ii) Confirm that this amount can be provided for from operating expenditure.**
 (Confirm that the amount, is anticipated to be an operating cost and is provided for as such in the Mining work

programme, Financial and Technical Competence Report or Prospecting Work Programme as the case may be).

Financial Guarantee

The financial guarantee for the rehabilitation for land disturbed by Brakpan Trust was submitted together with the application for a prospecting right.

Rehabilitation Fund

Brakpan Trust will also make provision for rehabilitation during closure by establishing a rehabilitation trust.

U. DEVIATIONS FROM THE APPROVED SCOPING REPORT AND PLAN OF STUDY.

i. Deviations from the methodology used in determining the significance of potential environmental impacts and risks.

None of the methodologies approved for the scoping report were deviated

ii. Motivation for the deviation.

Not applicable

V. OTHER INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

W. COMPLIANCE WITH THE PROVISIONS OF SECTIONS 24(4)(A) AND (B) READ WITH SECTION 24 (3) (A) AND (7) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998). THE EIA REPORT MUST INCLUDE THE:

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

(Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any directly affected person including the landowner, lawful occupier, or, where applicable, potential beneficiaries of any land restitution claim, attach the investigation report as **Appendix 2.19.1** and confirm that the applicable mitigation is reflected in 2.5.3; 2.11.6.and 2.12.herein).

The following impacts may be regarded as community impacts:

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

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

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

Heritage resources including archaeological and paleontological sites over 100 years old, graves older than 60 years, structure older than 60 years are protected by the National Heritage Resources Act no 25 of 1999. A Phase 1 Heritage Impact Assessment was conducted and the specialist assigned the farmstead and two rock engraving sites a field rating of Local Significance (conservation; mitigation not advised) (see Table 1). It is therefore advised that the engraving sites are fenced off and protected by a 10 meter wide no-go buffer zone.

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

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

From a local perspective the Remaining Extent of Portion 2 (Cypherfontein) and Portion 15 (On Avon – a Portion of Portion 2) of the farm Maraetchesfontein 54, Registration Division: HO, North West Province is preferred based on the outcomes of other diamond mines in the area to encounter further Diamond Reserves.

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

1) Draft environmental management programme.

A. Details of the EAP

Name of Practitioner	Qualifications	Contact details
Lizanne Esterhuizen	Honours Degree in Environmental Science (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: lizanne@milnex-sa.co.za
Percy Sehaole	Master's Degree in Environmental Science (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: percy@milnex-sa.co.za
Danie Labuschagne	Master's Degree in Environmental Management and Geography (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No. : (053) 963 2009 e-mail address: danie@milnex-sa.co.za

It is hereby confirmed that the requirements for the provision of the details and expertise of the EAP are contained in Part A, section 1(a) as required. The Curriculum Vitae for the responsible EAP is contained in **Appendix 1 and 2**.

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

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

F. COMPOSITE MAP

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

Refer to Locality Map, attached as in **Appendix 4**.

G. DESCRIPTION OF IMPACT MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENTS

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

Closure objectives for the alluvial diamond and general diamond mine will aim to ensure that the residual post-closure impacts be minimized and be acceptable to relevant parties. To achieve these closure objectives, the following will be implemented:

- All prospecting related infrastructure, foundations and concrete areas will be decommissioned, removed from the site and appropriately disposed of. Reclaimable structures such as metal, electrical installations or equipment will be sold for re-use or as scrap.
 - All disturbed areas within the site not already vegetated will be re-vegetated with appropriate indigenous, ecologically adapted species appropriate to the area and the final land use as soon as possible after operation ceases. Progress of vegetation growth/establishment, stability and drainage/erosion will be monitored and, in the event of adverse trends being identified, corrective measures will be implemented.
 - Vegetation monitoring will consider, inter alia, the establishment of perennial ground cover and infestation by alien invasive plant species. The encroachment of indigenous vegetation into the area will be used as an indication of a stable, self-sustaining vegetation cover with little risk of retrogressing to a situation where are and water pollution may occur.
- Final landforms must be resilient to perturbation and also be self-sustaining to obviate/limit further/ongoing interventions and maintenance by Brakpan Trust
 - The remaining impacts be of an acceptable nature with minimal deterioration over time.
 - The final outcome of the mine site rehabilitation would be productive systems, where required sustaining either livestock or wildlife.
 - Environmental and human quality of life, including health and safety requirements in general, would not be compromised; and
 - Closure is achieved in an efficient and cost-effective manner as possible and with minimum socioeconomic changes.

The above goal is underpinned by more specific objectives listed below.

1. **Upfront planning/development**

To provide overall guidance and direction to closure planning and/or the implementation of progressive closure measures over the remaining over the prospecting life.

2. **Physical stability**

To ensure that surface infrastructure and prospecting residue and/or disturbances that are present at processing plant decommissioning will be removed and/or stabilised in a manner that these will not compromise post-closure land use and be sustainable long-term landforms.

- Closure, removal and disposal of all surface infrastructure that has no beneficial post-closure use.
- Shaping and vegetating the remaining earth embankments, trenches, etc. to stabilise slopes and integrate with surrounding topography.

3. **Environmental quality**

To ensure that local environmental quality is not adversely affected by possible physical effects arising from prospecting operations and the prospecting site after closure. This will be achieved by:

- Avoiding and/or limiting the following during prospecting operations which could result in adverse effects that could not be readily addressed and/or mitigated at mine closure.
 - Dust fall-out areas surrounding the prospecting site.
- Wash-off and/or mobilisation of chemically contaminated soils and sediments from the prospecting site that could have long term adverse effects on local aquatic health and/or other water uses.
- Possible shallow groundwater contamination adversely affecting the quality of the local water resource and its beneficial use.
- Limiting the potential for dust generation on the rehabilitated prospecting site that could cause nuisance and/or health effects to surrounding landowners;
- Limiting the possible adverse water quality and quantity effects arising from the rehabilitated prospecting site to ensure that long term beneficial use of local resources is not compromised;
- Conducting soil clean-up/remediation to ensure that the planned land use could be implemented and maintained;

4. Health and safety

To limit the possible health and safety treats due to terrain hazards to humans and animals utilizing the rehabilitated prospecting site after closure by:

- Demonstrating through upfront soil testing that any resultant inorganic and organic pollution present on the site is acceptable;
- Removal of potential contaminants such as hydrocarbons and chemicals off site;
- Shaping of embankments and trenches to safe slopes and reintegrating of these into surrounding topography.
- Ensuring that the environmental quality as reflected above is achieved.

5. Land capability / land use

To ensure that the required land capability to achieve and support the planned land use can be achieved over the prospecting site by:

- Clean-up and reclamation of contaminated soil areas in order not to compromise the above land use planning earmarked for implementation;
- To ensure that the overall rehabilitated prospecting site is free draining
- Transferring prospecting related surface infrastructure to third parties for beneficial use after closure.

6. Aesthetic quality

To ensure that the rehabilitated prospecting site will display, at a minimum, an acceptable aesthetic appearance that would not compromise the planned land use by leaving behind:

- A prospecting area that is properly cleared-up with no fugitive/scattered waste piles
- Rehabilitated prospecting area that is free draining and disturbed areas that are suitably vegetated.
- Rehabilitated prospecting residues that are suitably landscaped, blending with the surrounding environment as far as possible.
- Shaped and rehabilitated terrace and hard stand areas, roughly emulating the local natural surface topography.

7. Landscape viability

To create a landscape that is self-sustaining and over time will evolve/converge to the desired ecosystem structure, function and composition by:

- Conducting surface profiling, with associated material movement optimisation, to obtain a landscape resembling the natural landscapes to support the succession trajectory towards a climax ecological system.
- Establishing woody patches and create “rough and loose” areas for pioneer specie establishment around the respective patches.
- Establishing pioneer species as follows:

- Collected and prepared seeds for broad casting;
- Seedlings grown on on-site nursery;
- Cuttings collected from surrounding veld areas;
- Conducting rehabilitation monitoring and corrective action as required.

8. Biodiversity

To encourage, where appropriate, the re-establishment of native vegetation on the rehabilitated mine site such the terrestrial biodiversity is largely re-instated over time, by:

- Stabilising disturbed areas to prevent erosion in the short- to medium term until a suitable vegetation cover has established; and
- Establishing viable self-sustaining vegetation communities of local fauna, as far as possible.

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

The Rehabilitation & Closure Plan is attached as **Appendix 8**.

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

CALCULATION OF THE QUANTUM

Applicant: **Brakpan Trust**
 Evaluator:

Ref No.: **NW30/5/1/1/2/12057PR**
 Date: **04/09/2017**

No.	Description	Unit	A	B	C	D	E=A*B*C*D
			Quantity	Master Rate	Multiplication factor	Weighting factor 1	Amount (Rands)
1	Dismantling of processing plant and related structures	m3	150	13,7	1	1	2055
2 (A)	Demolition of steel buildings and structures	m2		190,3	1	1	0
2(B)	Demolition of reinforced concrete buildings and structures	m2	0	280,46	1	1	0
3	Rehabilitation of access roads	m2	0	34,05	1	1	0
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	330,5	1	1	0
4 (A)	Demolition and rehabilitation of non-electrified railway lines	m	0	180,3	1	1	0
5	Demolition of housing and/or administration facilities	m2	0	380,6	1	1	0
6	Opencast rehabilitation including final voids and ramps	ha	0,26	193716,3	0,52	1	26190,44376
7	Sealing of shafts adits and inclines	m3	0	102,17	1	1	0
8 (A)	Rehabilitation of overburden and spoils	ha	0,1	133017,19	1	1	13301,719
8 (B)	Rehabilitation of processing waste deposits and evaporation ponds (non-polluting potential)	ha	0,1	165670,5	1	1	16567,05
8 (C)	Rehabilitation of processing waste deposits and evaporation ponds (polluting potential)	ha	0	481185,7	1	1	0
9	Rehabilitation of subsided areas	ha	0	111381,9	1	1	0
10	General surface rehabilitation	ha	0,01	105372,05	1	1	1053,7205
11	River diversions	ha	0	105372,05	1	1	0
12	Fencing	m	20	120,2	1	1	2404
13	Water management	ha	0	40065,4	1	1	0
14	2 to 3 years of maintenance and aftercare	ha	0,05	14022,9	1	1	701,145
15 (A)	Specialist study	Sum				1	0
15 (B)	Specialist study	Sum				1	0
						Sub Total 1	62273,07826
1	Preliminary and General		7472,769391	weighting factor 2		1	7472,769391
2	Contingencies		6227,307826				6227,307826
						Subtotal 2	75973,16
						VAT (14%)	10636,24
						Grand Total	86609

It is envisaged that 100 pits will be dug. It may be less depending on results.

294.824 ha- 3m x 2m x 5m pit (100 pits). It is planned that only 100 pits will be excavated in the first year, but it may be more if the process is quicker than planned for. It should be kept in mind that no more than 100 pits will be excavated. The total area to be disturbed a year will be- 100 pits x (3m x 2m) = 0.06ha per year

294.824 ha- 20m x 20m x 3m trench (60 Trenches). It is planned that only 5 trenches will be excavated in the first year to determine the feasibility of the resource, **if more trenches are planed the revised quantum will be submitted to the department.** It should be kept in mind that no more than 60 trenches will be excavated.

The total area to be disturbed a year will be- 5 trenches x (20m x 20m) = 0.2ha per year. No more than 0.26 ha will be left as un-rehabilitated in two years. Rehabilitation will be done concurrently.

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

Financial Guarantee

The financial guarantee for the rehabilitation for land disturbed Brakpan Trust was submitted together with the application for the prospecting right.

Rehabilitation Fund

Brakpan Trust will also make provision for rehabilitation during closure by establishing a rehabilitation trust.

ii) Impacts to be mitigated in their respective phases

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

ACTIVITIES	PHASE	SIZE AND SCALE of disturbance	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
<p>(E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc</p> <p>E.g. For mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)</p>	<p>(of operation in which activity will take place.</p> <p>State; Planning and design, Pre-Construction' Construction, Operational, Rehabilitation, Closure, Post closure).</p>	<p>(volumes, tonnages and hectares or m²)</p>	<p>(describe how each of the recommendations in herein will remedy the cause of pollution or degradation and migration of pollutants)</p>	<p>(A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)</p>	<p>Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.</p> <p>With regard to Rehabilitation specifically this must take place at the earliest opportunity. .With regard to Rehabilitation, therefore state either:-.</p> <p>Upon cessation of the individual activity Or.</p> <p>Upon the cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.</p>
<p>Clearance of vegetation</p>	<p>Pitting and trenching phase- (construction and operation phase)</p>	<p>294.824 ha- Only the areas where prospecting takes place, will be cleared.</p> <p>From the number of pits and trenches they plan to dig, it was calculated that only 2.47ha of vegetation will be cleared. No more than 100 pits and</p>	<ol style="list-style-type: none"> 1. Site clearing must take place in a phased manner, as and when required. 2. Areas which are not to be prospected on within two months must not be cleared to reduce erosion risks. 3. The area to be cleared must be clearly demarcated and this footprint strictly maintained. 4. Spoil that is removed from the site must be removed to an approved spoil site or a licensed landfill site. 5. The necessary silt fences and erosion control measures must be implemented in areas where these risks are more prevalent. 	<p>Compliance with Duty of Care as detailed within NEMA</p>	<p>Duration of operations on the prospecting activities.</p>

		<p>60 trenches will be dug</p> <p>No more than 0.707 ha will be left as un-rehabilitated in two years. Concurrent backfilling will take place in order to rehabilitate.</p>			
Construction of roads	Pitting and trenching phase- (construction and operation phase)		<ol style="list-style-type: none"> 1. Planning of access routes to the site for construction/prospecting purposes shall be done in conjunction with the Contractor and the Landowner. All agreements reached should be documented and no verbal agreements should be made. The Contractor shall clearly mark all access roads. Roads not to be used shall be marked with a "NO ENTRY for prospecting vehicles" sign. 2. Construction routes and required access roads must be clearly defined. 3. Damping down of the un-surfaced roads must be implemented to reduce dust and nuisance. 4. Soils compacted by construction/prospecting activities shall be deep ripped to loosen compacted layers and re-graded to even running levels. 5. The contractor must ensure that damage caused by related traffic to the gravel access road off the R370 is repaired continuously. The costs associated with the repair must be borne by the contractor; 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.

			<ol style="list-style-type: none"> 6. Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport the gravel are fitted with tarpaulins or covers; 7. All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits. 		
Prospecting of Alluvial Diamonds – Soils and geology	Pitting and trenching phase- (construction and operation phase)	<p>294.824 ha- Only the areas where prospecting takes place, will be cleared.</p> <p>From the number of pits and trenches they plan to dig, it was calculated that only 2.47ha of vegetation will be cleared. No more than 100 pits and 60 trenches will be dug</p> <p>No more than 0.707 ha will be left as un-rehabilitated in two years. Concurrent backfilling will take place in order to rehabilitate.</p>	<ol style="list-style-type: none"> 1. The Contractor should, prior to the commencement of earthworks determine the average depth of topsoil (If topsoil exists), and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas. 2. Care must be taken not to mix topsoil and subsoil during stripping. 3. The topsoil must be conserved on site in and around the pit/trench area. 4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order. 5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms, 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the mine

			<p>trenches or low brick walls around their bases.</p> <p>6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding.</p> <p>7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager.</p> <p>8. The impact on the geology will be permanent. There is no mitigation measure.</p>		
Prospecting Alluvial Diamonds – excavations	Pitting and trenching phase- (construction and operation phase)	<p>294.824 ha- Only the areas where prospecting takes place, will be cleared.</p> <p>From the number of pits and trenches they plan to dig, it was calculated that only 2.47ha of vegetation will be cleared. No more than 100 pits and 60 trenches will be dug</p> <p>No more than 0.707 ha will be left as un-rehabilitated</p>	<p>1. The prospecting activities must aim to adhere to the relevant noise regulations and limit noise to within standard working hours in order to reduce disturbance of dwellings in close proximity to the development.</p> <p>2. Mine, pans, workshops and other noisy fixed facilities should be located well away from noise sensitive areas. Once the proposed final layouts are made available by the Contractor(s), the sites must be evaluated in detail and specific measures designed in to the system.</p> <p>3. Truck traffic should be routed away from noise sensitive areas, where possible.</p> <p>4. Noise levels must be kept within acceptable limits.</p> <p>5. Noisy operations should be combined so that they occur where possible at the same time.</p>	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting area

		<p>in two years. Concurrent backfilling will take place in order to rehabilitate.</p>	<ol style="list-style-type: none"> 6. Mine workers to wear necessary ear protection gear. 7. Noisy activities to take place during allocated hours. 8. Noise from labourers must be controlled. 9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site. 10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport. 11. Implementation of enclosure and cladding of processing plants. 12. Applying regular and thorough maintenance schedules to equipment and processes. An increase in noise emission levels very often is a sign of the imminent mechanical failure of a machine. 		
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b) Impact Management Outcomes

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

ACTIVITY (whether listed or not listed).	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	MITIGATION TYPE	STANDARD TO BE ACHIEVED
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<p>(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.).</p>	<p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc....etc...)</p>		<p>In which impact is anticipated (e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)</p>	<p>(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc) E.g. <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring • Remedy through rehabilitation.. </p>	<p>(Impact avoided, noise levels, dust levels, rehabilitation standards, end use objectives) etc.</p>
<p>Clearance of vegetation</p>	<p>Loss or fragmentation of habitats</p>	<p>Fauna & flora</p>	<p>Pitting and trenching phase-(construction and operation phase)</p>	<p>Existing vegetation 1. Vegetation removal must be limited to the prospecting area. 2. Vegetation to be removed as it becomes necessary rather than removal of all vegetation throughout the site in one step. 3. No vegetation to be used for firewood. 4. Exotic and invasive plant species should not be allowed to establish, if the development is approved. Rehabilitation 5. All damaged areas shall be rehabilitated upon completion of the contract. 6. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction. 7. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit. 8. Rehabilitation must take place in a phased approach as soon as possible.</p>	<p>Minimisation of impacts to acceptable limits</p>

				<p>9. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding.</p> <p>10. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</p> <p>11. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.</p> <p>Demarcation of prospecting area</p> <p>12. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan.</p> <p>13. The prospecting area must be well demarcated and no construction/prospecting activities must be allowed outside of this demarcated footprint.</p> <p>14. Vegetation removal must be phased in order to reduce impact of construction/prospecting.</p> <p>15. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.</p> <p>16. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas.</p> <p>17. Soils must be kept free of petrochemical solutions that may be kept on site during construction/prospecting. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora.</p> <p>Utilisation of resources</p> <p>18. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p>Exotic vegetation</p> <p>19. Alien vegetation on the site will need to be controlled.</p> <p>20. The Contractor should be responsible for implementing a programme of weed control (particularly in</p>	
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				<p>areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>21. The spread of exotic species occurring throughout the site should be controlled.</p> <p>Herbicides</p> <p>22. Herbicide use shall only be allowed according to contract specifications. The application shall be according to set specifications and under supervision of a qualified technician. The possibility of leaching into the surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.</p> <p>23. The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.</p> <p>Fauna</p> <p>24. Rehabilitation to be undertaken as soon as possible after the prospecting activities have been completed.</p> <p>25. No trapping or snaring to fauna on the construction/prospecting site should be allowed.</p> <p>26. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</p>	
Prospecting Alluvial Diamonds and diamonds general – excavations	Loss of topsoil	Soil	Pitting and trenching phase-(construction and operation phase)	<p>1. The Contractor should, prior to the commencement of earthworks determine the average depth of topsoil, and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas.</p> <p>2. Care must be taken not to mix topsoil and subsoil during stripping.</p> <p>3. The topsoil must be conserved on site in and around the pit/trench area.</p>	Minimisation of impacts to acceptable limits

				<ol style="list-style-type: none"> 4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order. 5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases. 6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding. 7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager. <p>Establish an effective record keeping system for each area where soil is disturbed for prospecting purposes. These records should be included in environmental performance reports, and should include all the records below.</p> <ul style="list-style-type: none"> • Record the GPS coordinates of each area. • Record the date of topsoil stripping. • Record the GPS coordinates of where the topsoil is stockpiled. • Record the date of cessation prospecting activities at the particular site. • Photograph the area on cessation of prospecting activities. • Record date and depth of re-spreading of topsoil. • Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time. 	
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	Erosion	Soil Air Water	Pitting and trenching phase-(construction and operation phase)	<ol style="list-style-type: none"> 1. An effective system of run-off control should be implemented, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. 2. Periodical site inspection should be included in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence of any erosion on site or downstream. 3. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 4. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 5. Other erosion control measures that can be implemented are as follows: <ul style="list-style-type: none"> o Brush packing with cleared vegetation o Mulch or chip packing o Planting of vegetation o Hydroseeding/hand sowing 6. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 7. All erosion control mechanisms need to be regularly maintained. 8. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 9. Retention of vegetation where possible to avoid soil erosion. 10. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 11. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting activities are completed. This should be done through seeding with indigenous grasses. 12. No impediment to the natural water flow other than approved erosion control works is permitted. 	Minimisation of impacts to acceptable limits
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				<p>13. To prevent stormwater damage, the increase in stormwater run-off resulting from construction/prospecting activities must be estimated and the drainage system assessed accordingly.</p> <p>14. Stockpiles not used in three (3) months after stripping must be seeded or backfilled to prevent dust and erosion.</p>	
	Air Pollution	Air	Pitting and trenching phase-(construction and operation phase)	<p>Dust control</p> <ol style="list-style-type: none"> 1. Wheel washing and damping down of un-surfaced and un-vegetated areas. 2. Retention of vegetation where possible will reduce dust travel. 3. Clearing activities must only be done during agreed working times and permitting weather conditions to avoid drifting of sand and dust into neighbouring areas. 4. Damping down of all exposed soil surfaces with a water bowser or sprinklers when necessary to reduce dust. 5. The Contractor shall be responsible for dust control on site to ensure no nuisance is caused to the neighbouring communities. 6. A speed limit of 30km/h must not be exceeded on site. 7. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the Contractor. 8. Any dirt roads that are utilised by the workers must be regularly maintained to ensure that dust levels are controlled. <p>Odour control</p> <ol style="list-style-type: none"> 9. Regular servicing of vehicles in order to limit gaseous emissions. 10. Regular servicing of onsite toilets to avoid potential odours. <p>Rehabilitation</p> <ol style="list-style-type: none"> 11. The Contractor should commence rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks. 	Minimisation of impacts to acceptable limits

				<p>Fire prevention</p> <p>12. No open fires shall be allowed on site under any circumstance. All cooking shall be done in demarcated areas that are safe and cannot cause runaway fires.</p> <p>13. The Contractor shall have operational fire-fighting equipment available on site at all times. The level of firefighting equipment must be assessed and evaluated through a typical risk assessment process.</p>	
	Noise		Pitting and trenching phase-(construction and operation phase)	<p>1. The prospecting activities must aim to adhere to the relevant noise regulations and limit noise to within standard working hours in order to reduce disturbance of dwellings in close proximity to the development.</p> <p>2. Mine, crushers, workshops and other noisy fixed facilities should be located well away from noise sensitive areas. Once the proposed final layouts are made available by the Contractor(s), the sites must be evaluated in detail and specific measures designed in to the system.</p> <p>3. Truck traffic should be routed away from noise sensitive areas, where possible.</p> <p>4. Noise levels must be kept within acceptable limits.</p> <p>5. Noisy operations should be combined so that they occur where possible at the same time.</p> <p>6. Mine workers to wear necessary ear protection gear.</p> <p>7. Noisy activities to take place during allocated hours.</p> <p>8. Noise from labourers must be controlled.</p> <p>9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site.</p> <p>10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported</p>	Minimisation of impacts to acceptable limits

				<p>to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport.</p> <ol style="list-style-type: none"> 11. Implementation of enclosure and cladding of processing plants. 12. Applying regular and thorough maintenance schedules to equipment and processes. An increase in noise emission levels very often is a sign of the imminent mechanical failure of a machine. 	
	Impact on potential cultural and heritage artefacts	Heritage	Pitting and trenching phase-(construction and operation phase)	<ol style="list-style-type: none"> 1. Any finds must be reported to the nearest National Monuments office to comply with the National Heritage Resources Act (Act No 25 of 1999) and to DEA. 2. Local museums as well as the South African Heritage Resource Agency (SAHRA) should be informed if any artefacts are uncovered in the affected area. 3. The Contractor must ensure that his workforce is aware of the necessity of reporting any possible historical or archaeological finds to the ECO so that appropriate action can be taken. 4. 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 SAHRA should the proposed site affect any world heritage sites or if any heritage sites are to be destroyed or altered. 	Minimisation of impacts to acceptable limits
Waste management		Pollution	Pitting and trenching phase-(construction and operation phase)	<p>Litter management</p> <ol style="list-style-type: none"> 1. Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction site. 2. The Contractor shall supply waste collection bins where such is not available and all solid waste collected shall be disposed of at registered/licensed landfill. 3. Good housekeeping practices should be implemented to regularly maintain the litter and rubble situation on the construction site. 4. If possible and feasible, all waste generated on site must be separated into glass, plastic, paper, metal and wood 	Minimisation of impacts to acceptable limits

				<p>and recycled. An independent contractor can be appointed to conduct this recycling.</p> <ol style="list-style-type: none"> 5. Littering by the employees of the Contractor shall not be allowed under any circumstances. The ECO shall monitor the neatness of the work sites as well as the Contractor campsite. 6. Skip waste containers should be maintained on site. These should be kept covered and arrangements made for them to be collected regularly. 7. All waste must be removed from the site and transported to a landfill site promptly to ensure that it does not attract vermin or produce odours. 8. Where a registered waste site is not available close to the construction site, the Contractor shall provide a method statement with regard to waste management. 9. A certificate of disposal shall be obtained by the Contractor and kept on file, if relevant. 10. Under no circumstances may solid waste be burnt on site. 11. All waste must be removed promptly to ensure that it does not attract vermin or produce odours. <p>Hazardous waste</p> <ol style="list-style-type: none"> 12. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of offsite at a licensed landfill site, where practical. Incineration may be used where relevant. 13. Contaminants to be stored safely to avoid spillage. 14. Machinery must be properly maintained to keep oil leaks in check. 15. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction and any spills shall immediately be cleaned up and all affected areas rehabilitated. <p>Sanitation</p>	
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				<p>16. The Contractor shall install mobile chemical toilets on the site.</p> <p>17. Staff shall be sensitised to the fact that they should use these facilities at all times. No indiscriminate sanitary activities on site shall be allowed.</p> <p>18. Toilets shall be serviced regularly and the ECO shall inspect toilets regularly.</p> <p>19. Toilets should be no closer than 50m or above the 1:100 year flood line from any natural or manmade water bodies or drainage lines or alternatively located in a place approved of by the Engineer.</p> <p>20. Under no circumstances may open areas, neighbours fences or the surrounding bush be used as a toilet facility.</p> <p>21. The construction of “Long Drop” toilets is forbidden, but rather toilets connected to the sewage treatment plant.</p> <p>22. Potable water must be provided for all construction staff.</p> <p>Remedial actions</p> <p>23. Depending on the nature and extent of the spill, contaminated soil must be either excavated or treated on-site.</p> <p>24. Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site.</p> <p>25. The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil.</p> <p>26. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material.</p> <p>27. If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure.</p> <p>28. Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use.</p>	
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				<p>29. Contaminated remediation materials must be carefully removed from the area of the spill so as to prevent further release of petrochemicals to the environment, and stored in adequate containers until appropriate disposal.</p>	
Water Use and Quality	Water pollution	Water	Pitting and trenching phase-(construction and operation phase)	<p>Water Use</p> <ol style="list-style-type: none"> 1. Develop a sustainable water supply management plan to minimise the impact to natural systems by managing water use, avoiding depletion of aquifers and minimising impacts to water users. 2. Water must be reused, recycled or treated where possible. <p>Water Quality</p> <ol style="list-style-type: none"> 3. The quality and quantity of effluent streams discharged to the environment including stormwater should be managed and treated to meet applicable effluent discharge guidelines. 4. Discharge to surface water should not result in contaminant concentrations in excess of local ambient water quality criteria outside a scientifically established mixing zone. 5. Efficient oil and grease traps or sumps should be installed and maintained at refueling facilities, workshops, fuel storage depots, and containment areas and spill kits should be available with emergency response plans. <p>Stormwater</p> <ol style="list-style-type: none"> 6. The site must be managed in order to prevent pollution of drains, downstream watercourses or groundwater, due to suspended solids and silt or chemical pollutants. 7. Silt fences should be used to prevent any soil entering the stormwater drains. 8. Temporary cut off drains and berms may be required to capture stormwater and promote infiltration. 	

				<p>9. Promote a water saving mind set with construction/prospecting workers in order to Contractor ensure less water wastage.</p> <p>10. Hazardous substances must be stored at least 40m from any water bodies on site to avoid pollution.</p> <p>11. The installation of the stormwater system must take place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase.</p> <p>12. Earth, stone and rubble is to be properly disposed of, or utilized on site so as not to obstruct natural water path ways over the site. i.e. these materials must not be placed in stormwater channels, drainage lines or rivers.</p> <p>13. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed.</p> <p>14. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.</p> <p>Groundwater resource protection</p> <p>15. Process solution storage ponds and other impoundments designed to hold non fresh water or non-treated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.</p> <p>Sanitation</p> <p>16. Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).</p> <p>17. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.</p> <p>Concrete mixing</p>	
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				<p>18. Concrete contaminated water must not enter soil or any natural drainage system as this disturbs the natural acidity of the soil and affects plant growth.</p> <p>Public areas</p> <p>19. Food preparation areas should be provided with adequate washing facilities and food refuse should be stored in sealed refuse bins which should be removed from site on a regular basis.</p> <p>20. The Contractor should take steps to ensure that littering by construction/prospecting workers does not occur and persons should be employed on site to collect litter from the site and immediate surroundings, including litter accumulating at fence lines.</p> <p>21. No washing or servicing of vehicles on site.</p>
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c) Impact Management Actions

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

ACTIVITY Whether listed or not listed.	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.).	(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc....etc...)	(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc) E.g. <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring Remedy through rehabilitation.	Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required. With regard to Rehabilitation specifically this must take place at the earliest opportunity. .With	(A description of how each of the recommendations in 2.11.6 read with 2.12 and 2.15.2 herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)

			<p>regard to Rehabilitation, therefore state either:-.</p> <p>Upon cessation of the individual activity</p> <p>or.</p> <p>Upon the cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.</p>	
Clearance of vegetation	Loss or fragmentation of habitats	<p>Existing vegetation</p> <ol style="list-style-type: none"> 1. Vegetation removal must be limited to the prospecting site. 2. Vegetation to be removed as it becomes necessary rather than removal of all vegetation throughout the site in one step. 3. No vegetation to be used for firewood. 4. Exotic and invasive plant species should not be allowed to establish, if the development is approved. <p>Rehabilitation</p> <ol style="list-style-type: none"> 5. All damaged areas shall be rehabilitated upon completion of the contract. 6. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction. 7. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit. 8. Rehabilitation must take place in a phased approach as soon as possible. 9. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding. 	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>10. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</p> <p>11. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged.</p> <p>Demarcation of prospecting area</p> <p>12. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan.</p> <p>13. The prospecting area must be well demarcated and no construction activities must be allowed outside of this demarcated footprint.</p> <p>14. Vegetation removal must be phased in order to reduce impact of construction/prospecting.</p> <p>15. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.</p> <p>16. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas.</p> <p>17. Soils must be kept free of petrochemical solutions that may be kept on site during construction/prospecting. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora.</p> <p>Utilisation of resources</p> <p>18. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p>Exotic vegetation</p> <p>19. Alien vegetation on the site will need to be controlled.</p> <p>20. The Contractor should be responsible for implementing a programme of weed control</p>		
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		<p>(particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>21. The spread of exotic species occurring throughout the site should be controlled.</p> <p>Herbicides</p> <p>22. Herbicide use shall only be allowed according to contract specifications. The application shall be according to set specifications and under supervision of a qualified technician. The possibility of leaching into the surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.</p> <p>23. The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.</p> <p>Fauna</p> <p>24. Rehabilitation to be undertaken as soon as possible after prospecting has been completed.</p> <p>25. No trapping or snaring to fauna on the construction/prospecting site should be allowed.</p> <p>26. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</p>		
Prospecting of Alluvial Diamonds – excavations	Loss of topsoil	<p>1. The Contractor should, prior to the commencement of earthworks determine the average depth of topsoil, and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction/prospecting and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas.</p> <p>2. Care must be taken not to mix topsoil and subsoil during stripping.</p>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>3. The topsoil must be conserved on site in and around the pit/trench area.</p> <p>4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order.</p> <p>5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases.</p> <p>6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding.</p> <p>7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager.</p> <p>Establish an effective record keeping system for each area where soil is disturbed for prospecting purposes. These records should be included in environmental performance reports, and should include all the records below.</p> <ul style="list-style-type: none"> • Record the GPS coordinates of each area. • Record the date of topsoil stripping. • Record the GPS coordinates of where the topsoil is stockpiled. • Record the date of cessation prospecting activities at the particular site. • Photograph the area on cessation of prospecting activities. • Record date and depth of re-spreading of topsoil. 		
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		<ul style="list-style-type: none"> • Photograph the area on completion of rehabilitation and on an annual basis thereafter to show vegetation establishment and evaluate progress of restoration over time. 		
	Erosion	<ol style="list-style-type: none"> 1. An effective system of run-off control should be implemented, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. 2. Periodical site inspection should be included in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence of any erosion on site or downstream. 3. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 4. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 5. Other erosion control measures that can be implemented are as follows: <ul style="list-style-type: none"> ○ Brush packing with cleared vegetation ○ Mulch or chip packing ○ Planting of vegetation ○ Hydroseeding/hand sowing 6. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 7. All erosion control mechanisms need to be regularly maintained. 8. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 9. Retention of vegetation where possible to avoid soil erosion. 10. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 11. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting 	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>activities are completed. This should be done through seeding with indigenous grasses.</p> <p>12. No impediment to the natural water flow other than approved erosion control works is permitted.</p> <p>13. To prevent stormwater damage, the increase in stormwater run-off resulting from construction/prospecting activities must be estimated and the drainage system assessed accordingly. A drainage plan must be submitted to the Engineer for approval and must include the location and design criteria of any temporary stream crossings.</p> <p>14. Stockpiles not used in three (3) months after stripping must be seeded/backfilled to prevent dust and erosion.</p>		
	<p>Air Pollution</p>	<p>Dust control</p> <p>14. Wheel washing and damping down of un-surfaced and un-vegetated areas.</p> <p>15. Retention of vegetation where possible will reduce dust travel.</p> <p>16. Clearing activities must only be done during agreed working times and permitting weather conditions to avoid drifting of sand and dust into neighbouring areas.</p> <p>17. Damping down of all exposed soil surfaces with a water bowser or sprinklers when necessary to reduce dust.</p> <p>18. The Contractor shall be responsible for dust control on site to ensure no nuisance is caused to the neighbouring communities.</p> <p>19. A speed limit of 30km/h must not be exceeded on site.</p> <p>20. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the Contractor.</p> <p>21. Any dirt roads that are utilised by the workers must be regularly maintained to ensure that dust levels are controlled.</p>	<p>Duration of operation</p>	<p>The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.</p>

		<p>Odour control</p> <p>22. Regular servicing of vehicles in order to limit gaseous emissions.</p> <p>23. Regular servicing of onsite toilets to avoid potential odours.</p> <p>Rehabilitation</p> <p>24. The Contractor should commence rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks.</p> <p>Fire prevention</p> <p>25. No open fires shall be allowed on site under any circumstance. All cooking shall be done in demarcated areas that are safe and cannot cause runaway fires.</p> <p>26. The Contractor shall have operational fire-fighting equipment available on site at all times. The level of firefighting equipment must be assessed and evaluated through a typical risk assessment process.</p>		
	Noise	<p>1. The prospecting activities must aim to adhere to the relevant noise regulations and limit noise to within standard working hours in order to reduce disturbance of dwellings in close proximity to the development.</p> <p>2. Pans, power plants, crushers, workshops and other noisy fixed facilities should be located well away from noise sensitive areas. Once the proposed final layouts are made available by the Contractor(s), the sites must be evaluated in detail and specific measures designed in to the system.</p> <p>3. Truck traffic should be routed away from noise sensitive areas, where possible.</p> <p>4. Noise levels must be kept within acceptable limits.</p> <p>5. Noisy operations should be combined so that they occur where possible at the same time.</p> <p>6. Mine workers to wear necessary ear protection gear.</p>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>7.Noisy activities to take place during allocated hours. 8.Noise from labourers must be controlled. 9.Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site. 10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport. 11. Implementation of enclosure and cladding of processing plants. 12. Applying regular and thorough maintenance schedules to equipment and processes. An increase in noise emission levels very often is a sign of the imminent mechanical failure of a machine.</p>		
	<p>Impact on potential cultural and heritage artefacts</p>	<p>1.Any finds must be reported to the nearest National Monuments office to comply with the National Heritage Resources Act (Act No 25 of 1999) and to DEA. 2.Local museums as well as the South African Heritage Resource Agency (SAHRA) should be informed if any artefacts are uncovered in the affected area. 3.The Contractor must ensure that his workforce is aware of the necessity of reporting any possible historical or archaeological finds to the ECO so that appropriate action can be taken. 4.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 SAHRA should the proposed site affect any</p>	<p>Duration of operation</p>	<p>The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.</p>

		<p>world heritage sites or if any heritage sites are to be destroyed or altered.</p>		
<p>Waste Management</p>		<p>Litter management</p> <ol style="list-style-type: none"> 1. Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction/prospecting site. 2. The Contractor shall supply waste collection bins where such is not available and all solid waste collected shall be disposed of at registered/licensed landfill. 3. Good housekeeping practices should be implemented to regularly maintain the litter and rubble situation on the construction/prospecting site. 4. If possible and feasible, all waste generated on site must be separated into glass, plastic, paper, metal and wood and recycled. An independent contractor can be appointed to conduct this recycling. 5. Littering by the employees of the Contractor shall not be allowed under any circumstances. The ECO shall monitor the neatness of the work sites as well as the Contractor campsite. 6. Skip waste containers should be maintained on site. These should be kept covered and arrangements made for them to be collected regularly. 7. All waste must be removed from the site and transported to a landfill site promptly to ensure that it does not attract vermin or produce odours. 8. Where a registered waste site is not available close to the construction/prospecting site, the Contractor shall provide a method statement with regard to waste management. 9. A certificate of disposal shall be obtained by the Contractor and kept on file, if relevant. 10. Under no circumstances may solid waste be burnt on site. 	<p>Duration of operation</p>	<p>The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.</p>

		<p>11. All waste must be removed promptly to ensure that it does not attract vermin or produce odours.</p> <p>Hazardous waste</p> <p>12. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of offsite at a licensed landfill site, where practical. Incineration may be used where relevant.</p> <p>13. Contaminants to be stored safely to avoid spillage.</p> <p>14. Machinery must be properly maintained to keep oil leaks in check.</p> <p>15. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction/prospecting and any spills shall immediately be cleaned up and all affected areas rehabilitated.</p> <p>Sanitation</p> <p>16. The Contractor shall install mobile chemical toilets on the site.</p> <p>17. Staff shall be sensitised to the fact that they should use these facilities at all times. No indiscriminate sanitary activities on site shall be allowed.</p> <p>18. Toilets shall be serviced regularly and the ECO shall inspect toilets regularly.</p> <p>19. Toilets should be no closer than 50m or above the 1:100 year flood line from any natural or manmade water bodies or drainage lines or alternatively located in a place approved of by the Engineer.</p> <p>20. Under no circumstances may open areas, neighbours fences or the surrounding bush be used as a toilet facility.</p>		
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		<p>21. The construction of “Long Drop” toilets is forbidden, but rather toilets connected to the sewage treatment plant.</p> <p>22. Potable water must be provided for all construction staff.</p> <p>Remedial actions</p> <p>23. Depending on the nature and extent of the spill, contaminated soil must be either excavated or treated on-site.</p> <p>24. Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site.</p> <p>25. The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil.</p> <p>26. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material.</p> <p>27. If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure.</p> <p>28. Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use.</p> <p>29. Contaminated remediation materials must be carefully removed from the area of the spill so as to prevent further release of petrochemicals to the environment, and stored in adequate containers until appropriate disposal.</p>		
Water Use and Quality	Water pollution	<p>Water Use</p> <p>1. Develop a sustainable water supply management plan to minimise the impact to natural systems by managing water use, avoiding depletion of aquifers and minimising impacts to water users.</p>		

		<p>2. Water must be reused, recycled or treated where possible.</p> <p>Water Quality</p> <p>3. The quality and quantity of effluent streams discharged to the environment including stormwater should be managed and treated to meet applicable effluent discharge guidelines.</p> <p>4. Discharge to surface water should not result in contaminant concentrations in excess of local ambient water quality criteria outside a scientifically established mixing zone.</p> <p>5. Efficient oil and grease traps or sumps should be installed and maintained at refueling facilities, workshops, fuel storage depots, and containment areas and spill kits should be available with emergency response plans.</p> <p>Stormwater</p> <p>6. The site must be managed in order to prevent pollution of drains, downstream watercourses or groundwater, due to suspended solids and silt or chemical pollutants.</p> <p>7. Silt fences should be used to prevent any soil entering the stormwater drains.</p> <p>8. Temporary cut off drains and berms may be required to capture stormwater and promote infiltration.</p> <p>9. Promote a water saving mind set with construction/prospecting workers in order to Contractor ensure less water wastage.</p> <p>10. New stormwater construction must be developed strictly according to specifications from engineers in order to ensure efficiency.</p> <p>11. Hazardous substances must be stored at least 20m from any water bodies on site to avoid pollution.</p>		
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		<p>12. The installation of the stormwater system must take place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase.</p> <p>13. Earth, stone and rubble is to be properly disposed of, or utilized on site so as not to obstruct natural water path ways over the site. i.e. these materials must not be placed in stormwater channels, drainage lines or rivers.</p> <p>14. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed.</p> <p>15. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.</p> <p>Groundwater resource protection</p> <p>16. Process solution storage ponds and other impoundments designed to hold non fresh water or un-treated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.</p> <p>Sanitation</p> <p>17. Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).</p> <p>18. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.</p> <p>Concrete mixing</p> <p>19. Concrete contaminated water must not enter soil or any natural drainage system as this disturbs the natural acidity of the soil and affects plant growth.</p>		
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		<p>Public areas</p> <p>20. Food preparation areas should be provided with adequate washing facilities and food refuse should be stored in sealed refuse bins which should be removed from site on a regular basis.</p> <p>21. The Contractor should take steps to ensure that littering by construction workers does not occur and persons should be employed on site to collect litter from the site and immediate surroundings, including litter accumulating at fence lines.</p> <p>22. No washing or servicing of vehicles on site.</p>		
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Mechanisms for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon, including

- J. Monitoring of Impact Management Actions
- K. Monitoring and reporting frequency
- L. Responsible persons
- M. Time period for implementing impact management actions
- N. Mechanism for monitoring compliance
- O.

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
Clearance of vegetation	Loss or fragmentation of habitats	<ul style="list-style-type: none"> • Conduct regular internal audits • Conduct regular external audits 	<ul style="list-style-type: none"> • Environmental Manager • Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Prospecting of Alluvial Diamonds – excavations	Loss of topsoil Erosion Air Pollution Noise Impact on potential cultural and heritage artefacts	<ul style="list-style-type: none"> • Conduct regular internal audits • Conduct regular external audits 	<ul style="list-style-type: none"> • Environmental Manager • Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Waste management	Pollution	<ul style="list-style-type: none"> • Conduct regular internal audits • Conduct regular external audits 	<ul style="list-style-type: none"> • Environmental Manager • Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits

				should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Water Use and Quality	Water pollution	<ul style="list-style-type: none"> • Conduct regular internal audits • Conduct regular external audits 	<ul style="list-style-type: none"> • Environmental Manager • Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.

P. INDICATE THE FREQUENCY OF THE SUBMISSION OF THE PERFORMANCE ASSESSMENT REPORT.

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

Q. ENVIRONMENTAL AWARENESS PLAN

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

Brakpan Trust will implement an Environmental Awareness Plan which will include various mechanisms for informing employees of environmental risks resulting from their work, including:

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

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

See the attached **Appendix 11** for the Awareness plan

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

Brakpan Trust will implement an incident reporting and reporting procedure in order to identify risks timeously and implement actions to avoid or minimise environmental impacts.

**R. Specific information required by the Competent Authority
(Among others, Confirm that the financial provision will be reviewed annually).**

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

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