



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

AMENDED ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

Full Environmental Impact Assessment for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, 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	Thabo-Gaelebale Mineral Resources (Pty) Ltd
PREPARED BY	Milnex 189 CC
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FILE REFERENCE NUMBER SAMRAD:	NW30/5/1/1/2/11794PR

CLAUSE

This report has been compiled by Milnex 189 CC, using information provided by **Thabo-Gaelebale Mineral Resources (Pty Ltd)** 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. (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]** development footprint on the approved site as contemplated in the accepted scoping report;
 - (c) identify the location of the development footprint within the **[preferred]** approved site as contemplated in the accepted scoping report 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 location]** development footprint of the approved site as contemplated in the accepted scoping report 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]** development footprint on the approved site as contemplated in the accepted scoping report 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.

SCOPING OF ASSESSMENT AND CONTENT OF THE ENVIRONMENTAL IMPACT ASSESSMENT

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 **Thabo-Gaelebele Mineral Resources (Pty) Ltd** as the independent environmental consultant to undertake the EIA and EMPr process for a Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome Ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, 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:	<ol style="list-style-type: none"> 1) Remaining Extent of Portion 1 of the farm Lekker Sukkel Landgoed 454 2) Portion 2 of the farm Lekker Sukkel Landgoed 454 3) Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454 4) The farm Zandfontein 923 5) Portion 44 (portion of portion 5) of the farm Zandfontein 447 6) Portion 45 (portion of portion 5) of the farm Zandfontein 447 7) Remaining Extent of Portion 46 (portion of portion 5) of the farm Zandfontein 447 8) Remaining Extent of Portion 226 of the farm Zandfontein 447 9) Portion 343 (portion of portion 41) of the farm Zandfontein 447 10) Portion 369 of the farm Zandfontein 447 11) Portion 370 of the farm Zandfontein 447 12) Portion 371 of the farm Zandfontein 447 13) Portion 372 of the farm Zandfontein 447
Application area (Ha)	117.17 Ha
Magisterial district:	Bojanala Platinum District Municipality
Magisterial district:	Madibeng Local Municipality
Local Municipality	JQ
Registration division	The farm is situated approximately 8km South of the town Madibeng.
21 digit Surveyor General Code for each farm portion	<ol style="list-style-type: none"> 1) T0JQ00000000045400000 2) T0JQ00000000045400002 3) T0JQ00000000045400003 4) T0JQ00000000092300000 5) T0JQ00000000044700044 6) T0JQ00000000044700045 7) T0JQ00000000044700000 8) T0JQ00000000044700000 9) T0JQ00000000044700343 10) T0JQ00000000044700369 11) T0JQ00000000044700370 12) T0JQ00000000044700371 13) T0JQ00000000044700372

Farm co-ordinates

Farm	Longitude	Latitude
1. Remaining Extent of Portion 1 of the farm Lekker Sukkel Landgoed 454	27° 46' 27.025" E	25° 41' 3.410" S
	27° 46' 31.417" E	25° 41' 2.882" S
	27° 46' 35.503" E	25° 41' 2.391" S
2. Portion 2 of the farm Lekker Sukkel Landgoed 454	27° 46' 40.221" E	25° 41' 1.798" S
	27° 46' 44.911" E	25° 41' 1.258" S
3. Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454	27° 46' 56.046" E	25° 40' 59.929" S
	27° 47' 3.557" E	25° 40' 59.020" S
4. The farm Zandfontein 923	27° 47' 5.095" E	25° 41' 3.744" S
5. Portion 44 (portion of portion 5) of the farm Zandfontein 447	27° 47' 3.823" E	25° 41' 4.323" S
6. Portion 45 (portion of portion 5) of the farm Zandfontein 447	27° 47' 3.220" E	25° 41' 6.235" S
7. Remaining Extent of Portion 46 (portion of portion 5) of the farm Zandfontein 447	27° 47' 0.178" E	25° 41' 5.343" S
8. Remaining Extent of Portion 226 of the farm Zandfontein 447	27° 46' 59.514" E	25° 41' 4.535" S
9. Portion 343 (portion of portion 41) of the farm Zandfontein 447	27° 46' 57.968" E	25° 41' 4.357" S
10. Portion 369 of the farm Zandfontein 447	27° 46' 52.896" E	25° 41' 3.773" S
11. Portion 370 of the farm Zandfontein 447	27° 46' 48.573" E	25° 41' 3.888" S
12. Portion 371 of the farm Zandfontein 447	27° 46' 46.207" E	25° 41' 4.120" S
13. Portion 372 of the farm Zandfontein 447	27° 46' 41.252" E	25° 41' 4.605" S

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/12/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

	27° 46' 37.176" E	25° 41' 5.005" S
	27° 46' 35.987" E	25° 41' 5.159" S
	27° 46' 31.444" E	25° 41' 5.746" S
	27° 46' 27.961" E	25° 41' 6.196" S
	27° 46' 25.215" E	25° 41' 6.585" S
	27° 46' 21.324" E	25° 41' 13.405" S
	27° 46' 26.798" E	25° 41' 14.315" S
	27° 46' 26.195" E	25° 41' 43.409" S
	27° 46' 35.884" E	25° 41' 42.968" S
	27° 46' 51.761" E	25° 41' 46.579" S
	27° 46' 58.227" E	25° 41' 19.568" S
	27° 46' 59.918" E	25° 41' 8.850" S

C) LOCALITY MAP

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

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

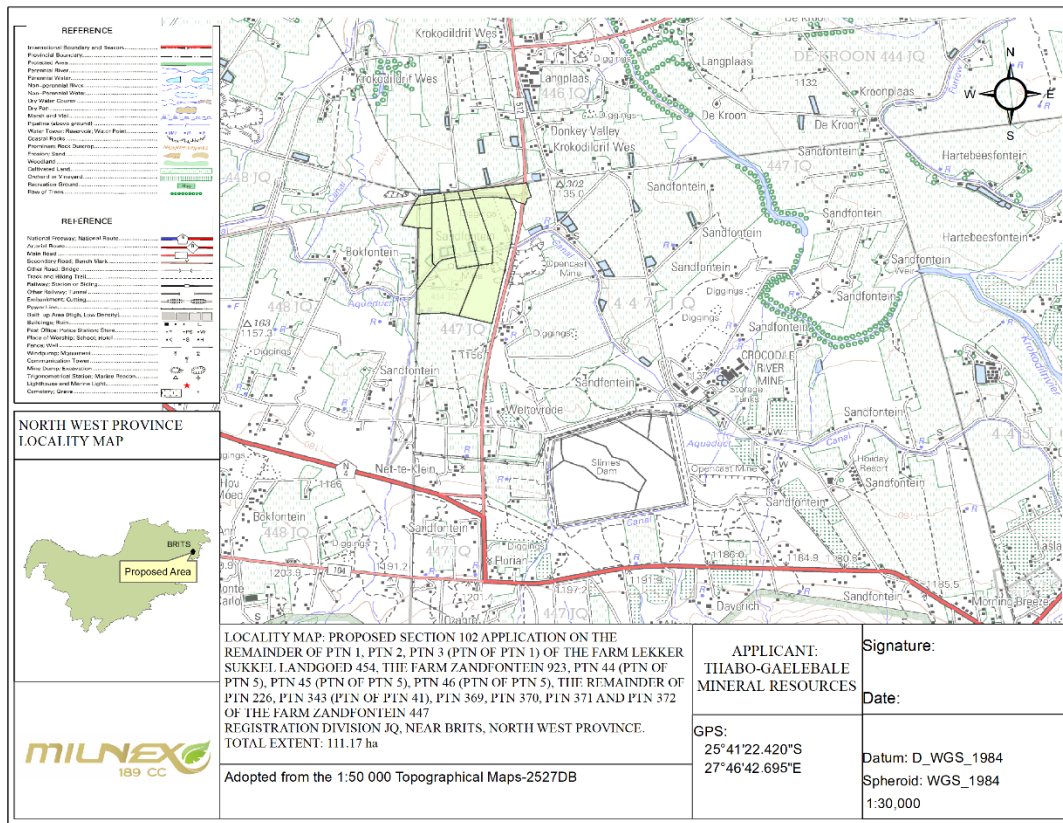


Figure 1: Locality Map

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/12/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

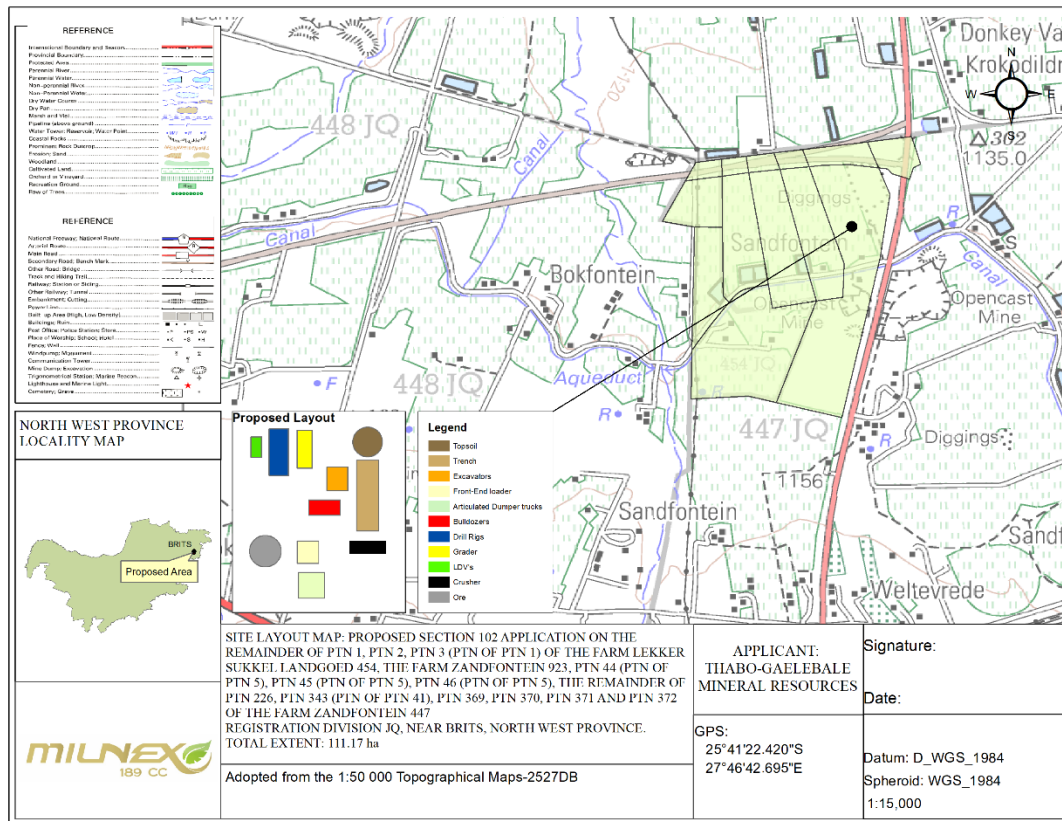


Figure 2: Site Plan Map

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

i) Listed and specified activities

<p>NAME OF ACTIVITY</p> <p>(E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)</p>	<p>Aerial extent of the Activity</p> <p>Ha or m²</p>	<p>LISTED ACTIVITY</p> <p>(Mark with an X where applicable or affected).</p>	<p>APPLICABLE LISTING NOTICE</p> <p>(GNR 324, GNR 325 or GNR 326)</p>	<p>WASTE MANAGEMENT AUTHORISATION</p> <p>(Indicate whether an authorisation is required in terms of the Waste Management Act).</p> <p>(Mark with an X)</p>
<p>Prospecting:</p> <p>BULK SAMPLING: 117.17 ha – 8 Geological boreholes (80m deep),16 trenches (10m x 1.8m x 2.5m) and 2 pits (1 pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m)</p> <p>Listing Notice GNR 325, Activity 19: “The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— (a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource [,]; or (b) [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)] the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;</p>	<p>117.17 ha - Only the areas where prospecting takes place, will be cleared.</p> <p>No more than 8 Geological boreholes,16 trenches and 2 pits will be excavated.</p>	<p>X</p>	<p>Listing Notice GNR 325, Activity 19:</p>	<p>-</p>

<p>Clearance of indigenous vegetation:</p> <p>BULK SAMPLING: 117.17 ha – 8 Geological boreholes (80m deep),16 trenches (10m x 1.8m x 2.5 m) and 2 pits (1 pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m)</p> <p>Listing Notice GNR 325, Activity 15:<i>"The clearance of an area of 20 hectares or more, of indigenous vegetation."</i> – Random indigenous vegetation clearance of over a 117.17 hectares area.</p>	<p>117.17 ha - Only the areas where prospecting takes place, will be cleared.</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice GNR 325, Activity 15</p>	<p>-</p>
<p>Prospecting Right:</p> <p>BULK SAMPLING: 117.17 ha – 8 Geological boreholes (80m deep),16 trenches (10m x 1.8m x 2.5 m) and 2 pits (1 pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m)</p> <p>Listing Notice GNR 325, Activity 20: "The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— (a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource [,] ; or (b) [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)] the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;</p>	<p>117.17 ha - Only the areas where prospecting takes place, will be cleared.</p>	<p>X</p>	<p>Listing Notice GNR 327, Activity 20:</p>	

<p>Residue stockpiles or residue deposits:</p> <p>Category A: (15) The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a prospecting right or mining permit, in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).</p>			<p>NEM:WA 59 of 2008 (Category A: (15))</p>	<p>X</p>
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Listed activities

Description of the overall activity. (Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaissance permit, Technical co-operation permit, Additional listed activity)	<ol style="list-style-type: none">1. Listing Notice GNR 325, Activity 15: "The clearance of an area of 20 hectares or more, of indigenous vegetation." – Random indigenous vegetation clearance of over 117.17 hectares area.2. Listing Notice GNR 325, Activity 19: "The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including—<ol style="list-style-type: none">(a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource [,]; or(b) [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)] the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;"3. Listing Notice GNR 327, Activity 20: "The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including—<ol style="list-style-type: none">(a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource [,]; or(b) [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)] the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;" <p>Prospecting right with bulk samples for the mining of Chrome ore (Cr) and Platinum Group Metals (PGM) including associated infrastructure, structure and earthworks.</p> <p>NEM:WA 59 of 2008 Residue stockpiles or residue deposits</p> <p>Category A: (15) The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a prospecting right or mining permit, in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).</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)

Thabo-Gaelebele Mineral Resources (Pty) Ltd has embarked on a process for applying for a Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

These portions are preferred due to the sites expected mineral resources. **Thabo-Gaelebele Mineral Resources (Pty) Ltd** requires a prospecting right in terms of NEMA and the Mineral and Petroleum Resources Development Act to mine Chrome ore and Platinum Group Metals (PGM), within the Madibeng Local Municipality, North West Province (refer to a locality map attached in **Appendix 3**).

Access roads

Existing roads and tracks already traverse the proposed prospecting site and where practicable, these roads will be used. Access will be obtained from a gravel road of the R512.

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Water Supply

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

Water uses

If water uses under section 21 a-k of the NWA is triggered, a Water Use Licence Application (WULA) must be lodged with the department of Water & Sanitation (DWS). A document was couriered on 10 July 2018 for comments. Please see **Appendix 6**.

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. Please see the list of hydrocarbons to be stored on site, below. 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.

Hydrocarbon and quantity			
Diesel	23 000 litres		
Engine Oil	630 litres		
Transmission Oil	210 litres		
Anti-freeze	210 litres		
Hydraulic Fluid	630 litres		
Gear Oil	210 litres		
Grease	190 litres	Converting 200kg grease to litre. Grease has a density of between 0.7kg per litre to 0.95kg per litre.	200kg X 0.95kg per litre = 190 litres
Total litres	25 080 litres		
	1 Cubic meter (m ³) is equal to 1000 litres		
Total cubic meters (m³)	25 080 litres / 1000 litres = 25.08 m³		

There is no need to apply for **GNR325: Listing notice 2, Activity 4** because the activity is only triggered when dangerous goods of 500m³ or more are stored, or stored and handled on site. For this application only 25.08 m³ will be stored and handled on site, which is well below the 500m³ limit.

Prospecting activities and phases

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

(i) DESCRIPTION OF PLANNED NON-INVASIVE ACTIVITIES:

(These activities do not disturb the land where prospecting will take place e.g. aerial photography, desktop studies, aeromagnetic surveys, etc)

Prospecting activities described in this Prospecting Work Programme (“PWP”) are aimed at determining the Chrome Ore (Cr) and Platinum Group Metals (PGM), content and overall mineral resource potential of the Prospecting Right Area. The activities will be a combination of both non-invasive and invasive techniques. A suitable level of feasibility study (technical and economic evaluation) will also be undertaken. The Prospecting Work Programme will take on a phased approach to assess the potential reserves in the area:

i) Access Negotiations

Once the prospecting right is granted and executed by the applicant, the applicant will negotiate further access with the surface owner and occupiers in order to do a detail technical evaluation of the prospecting area.

A contract will be drawn and negotiated with the surface owner regarding access and the suitability and time of year that is preferred that prospect drilling can commence.

ii) Data Gathering and Evaluation

From existing geological information, geophysical and topographical data, a geological base map will be produced and used as a basis for the exploration programme.

Additional detail geological field mapping will be conducted in order to finalize 8 (eight) borehole drilling programme.

iii) Geophysical Survey Programme

A gravimetric survey will be undertaken over certain areas only where drilling indicated economical mineral layers and warrants areal determination. The major geological features that affect the Merensky Reef and UG2 chromitite layer are faults, dykes, potholes and mafic/ultramafic pegmatites. Emphasis will be placed upon recognition of faults. Mapped faults, shear zones and geophysical lineaments will be treated as a single evidence layer in the modelling and it is assumed that they represent the same style of deformation.

vi) Geological Evaluations and Yearly Reporting of Exploration Results

A progress report will be submitted to the Department of Mineral Resources regarding exploration information gained during this period of exploration.

The mineral resource will be calculated using computer modelling and geostatistical principles such as Kriging. The mineral measures and reserves will be classified according to the SAMREC Code.

vii) Market research and Mining Right Application

Agreements will be searched to market the mineral resources of the indicated economical viable mineral resource, required for a Mining Right Application.

(ii) DESCRIPTION OF PLANNED INVASIVE ACTIVITIES:

(These activities result in land disturbances e.g. sampling, drilling, bulk sampling, etc)

iv) Phased Geological Core Drilling Programme

Eight (8) geological boreholes (TNW) will be drilled in Year 1 and Year 2 in targeted areas of the prospecting area to a depth of 80m where economical mineral seams should be present. All borehole cores will be logged, surveyed and plotted on the base plan.

The core will be tested for Cr and PGM minerals. All drill holes will be rehabilitated by replacing unused cores back and replacing the blasted rock to the ground together with the overburden. The drilling sump will also be closed and any other materials removed from the drill site. If the quality and density of the minerals warrants further investigation, full oxide analysis will be undertaken.

v) Pitting, Trenching and Blasting

Preliminary exploration will be performed by pitting and trenching of the outcrop to observe and take bulk samples on a continuous basis across the mineralized zone. This is done to provide initial information to the geologist in order to improve the parameters estimated for this sampling program.

Bulk sampling will include the excavation of 2 pits and 16 trenches. The dimensions of the pits will be 115m x 115m x 50m deep and 132m x 322m x 55m deep. Dimensions for trenches to be excavated will be 10 m x 1.8m m x 2.5 m deep. Blasting will be done only when resistant rock is intercepted during trenching. The floor area will be wide enough to allow access for a front end loader/excavator to collect sample material.

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)
Mine, Health and Safety Act 29 of 1996	
National Environmental Management: Waste Act 59 of 2008	
National Environmental Management: Biodiversity Act 10 of 2004	
Bojanala Platinum District Municipality Integrated Development Plan (IDP)	-
Madibeng Local Municipality Integrated Development Plan (IDP)	-

Policy and Legislative Context

Legislation/Policy	Description
<p>The Convention of Biological Diversity (Rio de Janeiro, 1992).</p>	<p>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.</p>
<p>South African Constitution 108 of 1996</p>	<p>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.</p>
<p>Strategic Framework for Sustainable Development in South Africa</p>	<p>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>
<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>
<p>National Forest Act 84 of 1998</p>	<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.

<p>National Environmental Management: Protected Areas Act 57 of 2003</p>	<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>
<p>Mine, Health and Safety Act 29 of 1996</p>	<p>The Mine Health and Safety Inspectorate was established in terms of the Mine Health and Safety Act, 1996 (Act No. 29 of 1996), as amended, for the purpose of executing the statutory mandate of the Department of Mineral Resources to safeguard the health and safety of mine employees and communities affected by mining operations.</p>
<p>National Environmental Management: Waste Act 59 of 2008</p>	<p>The Act reform the law regulating waste management in order to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development; to provide for institutional arrangements and planning matters; to provide for national norms and standards for regulating the management of waste by all spheres of government; to provide for specific waste management measures; to provide for the licensing and control of waste management activities; to provide for the remediation of contaminated land; to provide for the national waste information system; to provide for compliance and enforcement; and to provide for matters connected therewith.</p>
<p>National Environmental Management: Biodiversity Act 10 of 2004</p>	<p>This Act provides for the management and conservation of South Africa’s biodiversity within the framework of the National Environmental Management Act, 1998; the protection of species and ecosystems that warrant national protection; the sustainable use of indigenous biological resources; the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources; the establishment and functions of a South African National Biodiversity Institute; and for matters connected therewith</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).

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

Chrome ore

According to the Chamber of mines: Facts and Figures, 2016: Employment figures for chrome mining was 15,514 in 2016 (Chamber of Mines, South Africa, 35:2017)

Chrome is known for its high corrosion resistance and hardness. It is essential in the production of stainless steel, which accounts for 85% of its commercial use. Around 70% of the world's chrome resources can be found in South Africa. South Africa is also the largest producer of chrome globally. (Chamber of Mines, South Africa, 16:2016)

Platinum Group Metals (PGM)

The Bushveld Igneous Complex formed some 2 billion years ago, is the world's largest layered intrusion, created when vast quantities of molten rock from the earth's mantle was brought to the surface through long vertical cracks or intrusions (Chamber of Mines, South Africa, 10:2016).

In South Africa, the discovery of the first platinum nuggets dates back to 1924. Geologist Hans Merensky's follow-up work resulted in the discovery of the Bushveld Igneous Complex. This complex hosts more than half the world's platinum group metals (PGMs) and associated minerals, such as nickel, chromium, vanadium and refractory minerals. In fact, South Africa is host to around 80% of the world's known platinum reserves (Chamber of Mines, South Africa, 10:2016).

Six noble metals, all silvery-white in appearance, constitute PGMs – platinum, palladium, rhodium, ruthenium, osmium and iridium. Platinum, palladium and rhodium are the primary metals of significant economic value. They are used largely for jewellery and in the automotive industry for their excellent catalytic properties. Other uses include investment (coins and bars), fuel cells, and many other industrial purposes (Chamber of Mines, South Africa, 10:2016).

In the last 10 years employment in the sector increased from 168,530 employees in 2006, to over 172,310 in 2016 (Chamber of Mines, South Africa, 19:2017).

Prospecting and mining activities for chrome ore and Platinum Group Metals (PGM) takes place in the facility of the proposed area which suggest the possibility of encountering further chrome deposits.

The North West Province is an important supplier of chrome and Platinum Group Metals (PGM) 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 farm is situated approximately 8km South of the town Madibeng.

Preferred activity

The prospecting of Chrome ore and Platinum Group Metals (PGM), is one of the optimum preferred activities for the site since there is an existing prospecting right on the proposed area and the other is crop production.

The applicant believes that Chrome ore and Platinum Group Metals (PGM) is present on the proposed area. 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;

• Consideration of alternatives

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

• Location alternatives

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. Also, it is expected that the Chrome ore and Platinum Group Metals (PGM), have been deposited on this farm and therefore the applicant would like to commence with their prospecting activities.

Land capability is the combination of soil suitability and climate factors. The site and surrounding area has a land capability classification, on the 8 category scale, of Class 3 (III) – arable, Land in Class III (AGIS, 2016):

- Land in Class III has severe limitations that reduce the choice of plants or require special conservation practices, or both.
- It may be used for cultivated crops, but has more restrictions than Class II. When used for cultivated crops, the conservation practices are usually more difficult to apply and to maintain.
- The number of practical alternatives for average farmers is less than that for soils in Class II.
- Limitations restrict, singly or in combination, the amount of clean cultivation, time of planting, tillage, harvesting, choice of crops.
- Limitations may result from the effects of one or more of the following:
 - Moderately steep slopes.
 - High susceptibility to water or wind erosion or severe adverse effects of past erosion.
 - Frequent flooding accompanied by some crop damage.
 - Very slow permeability of the subsoil.
 - Wetness or some continuing waterlogging after drainage.
 - Shallow soil depth to bedrock, hardpan, fragipan or claypan that limit the rooting zone and the water storage.
 - Low water-holding capacity.
 - Low fertility not easily corrected.
 - Moderate salinity or sodicity.
 - Moderate climatic limitations.

(refer to Land capability map attached as **Appendix 5**)

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

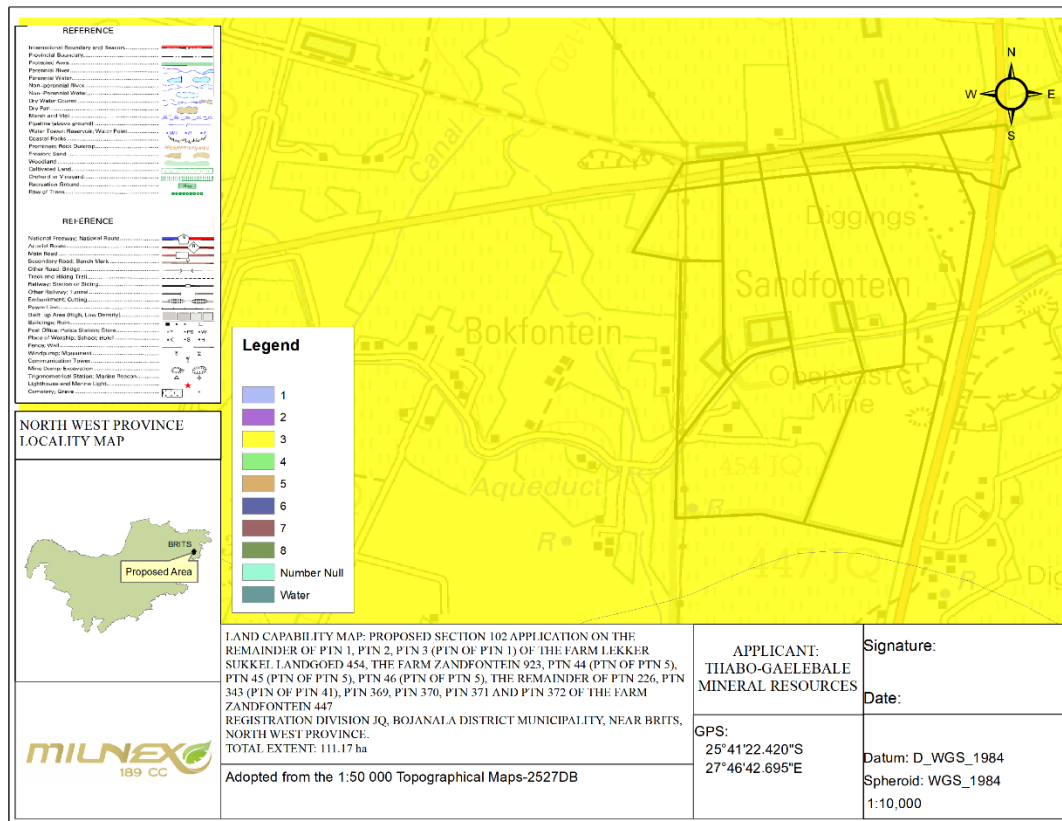


Figure 3: Land Capability Map

- **Activity alternatives**

The environmental impact assessment process also needs to consider if the development of a Chrome ore and Platinum Group Metals (PGM), 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 Chrome ore and Platinum Group Metals (PGM).

Agriculture – The site is used for cultivation.

- **Design and layout alternatives**

Even though there are previous mining present on the proposed area, 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.

Prospecting activities described in this Prospecting Work Programme (“PWP”) are aimed at determining the Chrome Ore (Cr) and Platinum Group Metals (PGM), content and overall mineral resource potential of the Prospecting Right Area. The activities will be a combination of both non-invasive and invasive techniques. A suitable level of feasibility study (technical and economic evaluation) will also be undertaken. The Prospecting Work Programme will take on a phased approach to assess the potential reserves in the area:

- **No-go alternative**

This alternative considers the option of ‘do nothing’ and maintaining the status quo. The description provided in section H of this report could be considered the baseline conditions (status quo) to persist should the no-go alternative be preferred. Should the proposed activity not proceed, the site will remain unchanged and will continue to be used for cultivation and prospecting without bulk sampling.

- **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.

The preferred technology for the proposed mining activity, will be to drill, pitting and trenching to remove the Chrome ore and Platinum Group Metals (PGM) with a front-end loader/excavator/bulldozer. Blasting will be done only when resistant rock is intercepted during trenching. The ore removed will be crushed on site but washed off site. Please find the Prospecting Work Programme attached as **Appendix 9**.

Reverse Circulation Drilling (RC drilling)

Drill Structure

RC drilling is usually a large piece of apparatus, that requires a lot of space, not just for the rig itself, but the supporting vehicles and the pit for collecting waste runoff.

The drill cutting is transferred to the surface inside drill rods, which are linked together to create a ‘drill string’. Drill bits attached to the end of the hammer are made from tungsten-steel, and are usually around 13-20cm in diameter. These also have metal nodules attached at the end to allow cutting through particularly tough rock. Most RC drilling uses a dual-tube drill rods, with one tube inside another. The tubes inside overlap and provide a path for drilled rock from the ground to the surface. Inner tubes can be sealed together, meaning that the RC drill can sample up to very large depths, often around 500m.

Another type of RC drilling is ‘centre sample’ drilling. This is a modern variation, in which a central hammer, with a hollow centre, allows the sample to immediately enter the drill pipe, without the need to travel past the hammer (AZOMining, 2012)

Sample Extraction

The samples produced from RC drilling are dry chips of the drilled rock. To create the sample, the hammer acts like a pneumatic piston and pushes a tungsten-steel drill bit on to the rock, breaking it up. Before the drill bit hits the rock, it is dried out using an air compressor, so that the rock chips are dry at the surface.

Water is often used down the hole to cool the drill bit and reduce dust, as well as assisting with the transportation of sample bits to the surface. Air is blown down the drill rods to create a pressure difference, allowing the sample chips and water to rise through the inner tube. The sample then reaches a bell at ground level, which transports the sample to a cyclone where it dries out and is deposited into sacks (AZOMining, 2012).

Applications

RC drilling is a technique used in most stages of mine development.

As it is cheaper than diamond core drilling, it is often used in first stage exploration mining to delineate a potentially extractable ore body. It is also preferable to RAB or air-core drilling when trying to reach great depths, but RC drilling is slower and more expensive than either of these two methods.

RC drilling is also consistently used during in-pit grade control and the development stage of an ore body (AZOMining, 2012).

Pros & Cons of the alternative RC drilling

Advantages	Disadvantages
Direct drilling cost reductions in the range of 25% to 40%.	Less geological information from sample.
Faster completion of drill programs with quicker delivery of results.	Holes can deviate (Spiral Stabiliser Subs keep holes straighter)
Reduced man-hours at the drill with decreased exposure to potential accidents.	Diamond drill can usually drill to greater depth although depths up to 800m have been achieved with.

Reduced contractor activity in the mine reduces mine support burden.	
Indirect cost reductions gained from a simplified sampling process.	

Diamond Core Drilling

Diamond drilling allows the removal of solid cylinders of rock (core) from deep within the earth.

Drill Structure

Diamond core drilling is so called because it uses a 'diamond bit'. This drill bit is composed of group of small, industrial grade diamonds set into a metallic, soft matrix. As the ground is drilled, this matrix will wear away and expose more diamonds.

This is then attached to a drill rod, which is around 10 foot in length, and then more sections of pipe can be attached to the top of this so a greater depth can be drilled. The depth that is drilled to is estimated by the number of rods attached to the top of the drill rod.

Inside the drill rod, a core tube is attached to a cable via a latching mechanism. The core tube is lifted to the surface using the cable, so the solid core can be removed.

There are two primary types of diamond drilling-rotary drilling and wineline drilling. Rotary drilling is used primarily for bore hole drilling, whereas wineline drilling is used for solid core sampling.

There are five standard tube sizes associated with wire line drilling. These are as follows:

- AQ (Hole diameter: 48mm)
- BQ (60mm)
- NQ (75.5mm)
- HQ (96mm)
- PQ (122.6mm)

The drill size used depends on the desired core diameter and the desired depth of drilling, and the wider the diameter of the tube, the more power that is required to drive the drilling (AZOMining, 2012).

Core Extraction

To extract core, the drill rod rotates the diamond bit, spinning it into the ground. As the drill bit bores through the rock, solid rock is taken into the circular opening at the end of the bit, into the core tube, and can then be recovered at the surface as it piles up. Once the core is recovered at the surface it is broken along natural fractures and stored in core trays to await analysis. A standard core tray can hold around 10 feet of core.

For optimum core extraction, the driller must listen to the drill to evaluate subsurface conditions. To keep drilling efficient, the rotation speed, pressure and water circulation must be strictly monitored.

Sometimes when drilling in highly fractured zones, overheating can occur due to a stuck bit. This issue is usually counteracted by the injection of mud or sawdust to plug fractures in the rock.

Application

Diamond core finds its primary function in the exploration mining sector. It is usually one of the last stages of exploration, during which the orebody is delineated in three dimensions. This will determine whether the prospect is economically viable. Using a diamond drill rig, long vertical sections of core can be extracted from deep in the ground, which can then be analysed at the surface by geologists.

The core can then be analysed using a wide range of petrologic, structural and mineralogical techniques to determine whether the potential mining site is economically viable.

Extracted core is first washed and macroscopic features are logged by an exploration geologist. The core is then cut and representative samples are sent for chemical analysis (AZOMining, 2012).

Pros & Cons of the alternative Diamond Core Drilling

Advantages	Disadvantages
Highly accurate cutting	Drill bits are often not very big and they are mostly able to cut through only stone, rock and cement.
A reduced risk of inadvertently causing structural damage	There is a powerful kick back from the machinery so caution needs to be applied when using diamond core drilling.
Less debris is produced	While dust will not accumulate in large quantities some dust is likely to go into the drilling machine which can have an effect on its functioning and effectiveness.
Suitable for just about any working environment	
Very little noise and no dust	
Equipment is lightweight and portable	
Can be done remotely which limits the safety hazards.	
Drill to great depth	

For this project the Diamond core drilling 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

Since the proposed development is unlikely to result in any impacts that extent beyond the municipal area where it is located, it was deemed sufficient to advertise in a local newspaper. An advertisement was placed in English in the local newspaper (**Brits Pos**) on **20 April 2018** (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 was placed (as anticipated on the coordinates below) on site in English on **24 April 2018** to inform surrounding communities and immediately adjacent landowners of the proposed development. I&APs will be given the opportunity to raise comments. Photographic evidence of the site notices will be included in Appendix 6. Below are the coordinates where the site notices were placed.

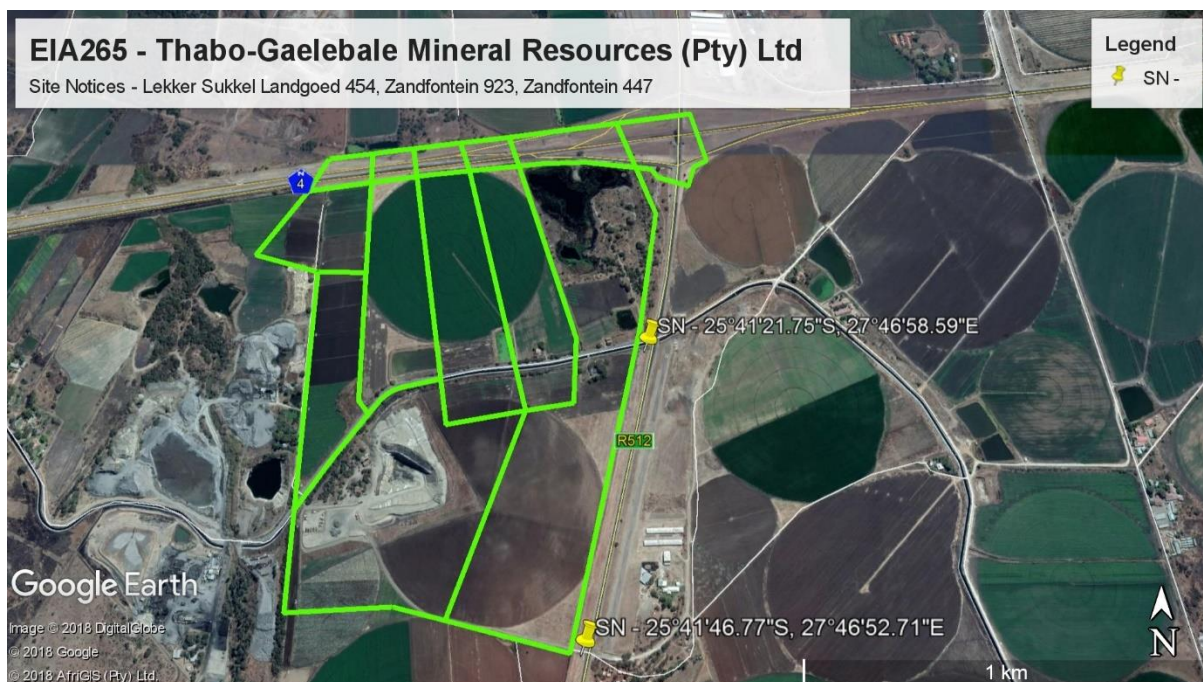


Figure 4: Site notice co-ordinates

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 **3 April 2018** and were requested to submit comments by **7 May 2018**. A copy of the report is also available at the Milnex offices in Schweizer-Reneke, 4 Botha Street, Schweizer-Reneke and Potchefstroom (Waterberry Street, Waterberry Square, 1st floor, Office 5B, Potchefstroom), between 7:30AM and 5PM, Monday to Friday. For a complete list of stakeholder details and for proof of registered post see **Appendix 6**. The consultees included:

- Department of Rural, Environmental and Agricultural Development (READ), North West
- Department of Water & Sanitation (DWS)
- Department of Mineral Resources (DMR)
- North West Department of Agriculture

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

- Provincial Heritage Resources Agency (PHRA), North West
- Department of Public Works, Roads and Transport in NW (DPWRT)
- Department of Agriculture, Forestry, and Fisheries (DAF)
- Wildlife and Environment Society of South Africa (WESSA)
- Bojanala Platinum District Municipality
- Municipal Manager at the Madibeng Local Municipality
- Local Councilor at the Madibeng Local Municipality

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

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 **3 April 2018**. The surrounding land owners were given the opportunity to raise comments by **7 May 2018**. For a list of surrounding land owners see **Appendix 6**.

5. Consultation

The Public Meeting was scheduled for **24 April 2018 at 10:00am–11:00am** on the R512 across the airfield adjacent Portion 226 of the farm Zandfontein 447 at the coordinates mentioned below. The coordinates and directions (figure1) of the public meeting follows below.

Coordinates

25°41'21.01"S

27°46'59.11"E

Directions to Public Meeting

The Public meeting will be held on the R512 across the airfield adjacent Portion 226 of the farm Zandfontein 447.

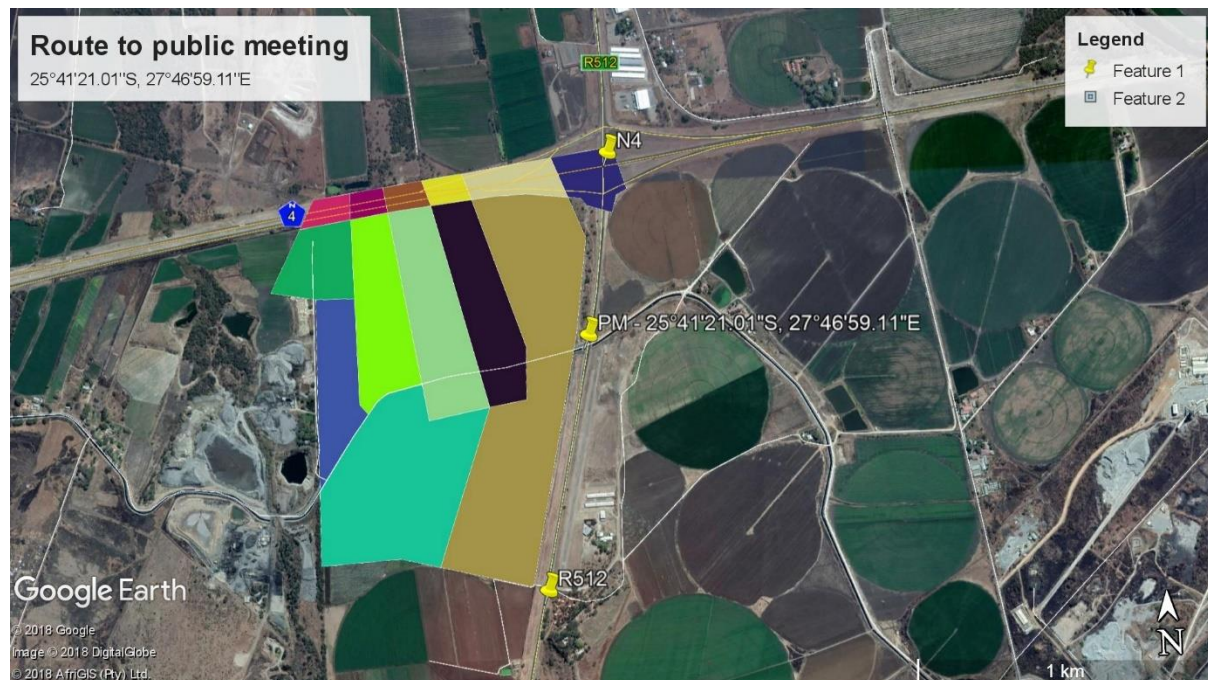


Figure 5: Directions from Rustenburg to the public meeting

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. The following key stakeholders and surrounding land owners were also directly informed of the public meeting via registered post **3 April 2018**.

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

Stakeholders	Land owners	Surrounding Land owner
Department of Rural, Environmental and Agricultural Development (READ), North West	Hernic Ferrochrome Pty Ltd	Chemstof Pty Ltd
Department of Water & Sanitation (DWS)	South African National Roads Agency Ltd Northern Region	South African National Roads Agency Ltd, Northern Region
Department of Mineral Resources	Johannes Petrus De Beer	On behalf of the Republic of South Africa, Department of Rural Development and Land Reform
North West Department of Agriculture	Chemstof Pty Ltd	Barplats Mines Ltd
Provincial Heritage Resources Agency (PHRA), North West		S.P.D.M. Eiendomme CC
Department of Public Works, Roads and Transport in NW (DPWRT)		Nadine De Beer
Department of Agriculture, Forestry, and Fisheries (DAF)		Hendrik Cornelis Janse Van Rensburg
Wildlife and Environment Society of South Africa (WESSA)		Petrus Johannes Mare
Bojanala Platinum District Municipality		Not available
Municipal Manager at the Madibeng Local Municipality		Gert Van Rensburg Familietrust
Local Councilor at the Madibeng Local Municipality		Not available
		Cecilia Trust
		Johannes Petrus De Beer

6. Public Meeting

Please note that the Stakeholders & Interested and Affected Parties were informed about the proposed project with the use of press advertisement and registered letters and no one registered.

The meeting was attended by Mr. Danie Labuschagne from Milnex 189 CC Environmental Consultation.

None of the surrounding land owners, I&AP or stakeholders 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 **6 July 2018** and were requested to submit comments by **6 August 2018**. 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**.

Table 2: List of Stakeholders, Land owners, & surrounding land owners

Stakeholders	
Department of Rural, Environmental and Agricultural Development (READ), North West	Department of Agriculture, Forestry, and Fisheries (DAF)
Department of Water & Sanitation (DWS)	Wildlife and Environment Society of South Africa (WESSA)
Department of Mineral Resources	Bojanala Platinum District Municipality
North West Department of Agriculture	Municipal Manager at the Madibeng Local Municipality
Provincial Heritage Resources Agency (PHRA), North West	Local Councilor at the Madibeng Local Municipality
Department of Public Works, Roads and Transport in NW (DPWRT)	
Land owners	
Hernic Ferrochrome Pty Ltd	South African National Roads Agency Ltd Northern Region
Johannes Petrus De Beer	Chemstof Pty Ltd
Not available	
Surrounding Land owner	
Chemstof Pty Ltd	South African National Roads Agency Ltd Northern Region
On behalf of the Republic of South Africa Department of Rural Development and Land Reform	Barplats Mines Ltd
S.P.D.M. Eiendomme CC	Nadine de Beer
Hendrik Cornelis Janse van Rensburg	Petrus Johannes Mare
Gert van Rensburg Familie Trust	Cecilia Trust
Johannes Petrus de Beer	

8. Land owner consent:

Please see **Appendix 12** for the proof of consent.

Property	Landowner	Consent
Zandfontein 226/447 Farm 0/923	Hernic Ferrochrome Pty Ltd	Yes
Zandfontein 343/447, 372/447 Lekker Sukkel Landgoed 3/454	South African National Roads Agency Ltd Northern Region. Ria Barkhuizen	Yes
Zandfontein 44/447, 45/447, 46/447	Bakie de Beer	Yes
Lekker Sukkel Landgoed 1/454, 2/454	Chemstof Pty Ltd: Jeannette Kruger	If the EA is granted, a Section 102 Part 1 amendment will be submitted to excluded his portions. An Amendment was submitted on 4 July 2018 to exclude the property from the granted prospecting right on MLA side.
Zandfontein 369/447, 370/447, 371/447	Not available	

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

9. 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

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

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					
Zandfontein 226/447 Farm 0/923	Hernic Ferrochrome Pty Ltd		No comments received		
Zandfontein 343/447, 372/447 Lekker Sukkel Landgoed 3/454	South African National Roads Agency Ltd Northern Region. Ria Barkhuizen	04/05/2018 15/05/2018	Email received 07/05/2018 with attached Comments and response form, requesting that Milnex 189 CC send them project information.	A document was couriered on the 15/05/2018.	
		13/06/2018	Email received 13/06/2018 with letter attached states the following: SANRAL is the registered landowner of the property known as the farm Zandfontein 343/447 as well as the farm Lekker Sukkel Landgoed 3/454 situated in the Brits Magisterial District, North West province. (Hereinafter referred to as “the properties”) hereby confirms that Thabo-Gaelebale Mineral Resources (Pty) Ltd have entered into a consultation process with SANRAL with regards to the Prospecting Right Application. SANRAL acknowledged said consultation and stipulated in a letter dated 17/11/2015 that it have any objection to the approval of the application. As registered landowner of the properties, SANRAL, confirm that it gives its consent to the envisaged prospecting activities as per the amended PWP to be conducted by Thabo-Gaelebale Mineral Resources (Pty) Ltd on the parts of the	Email sent 13/06/2018 acknowledges receipt of the comments.	

			properties outside the declared N4 and R512 road reserve boundaries.		
		06/07/2018		Email sent 06/07/2018 with consultation letter attached.	
Zandfontein 44/447, 45/447, 46/447	Bakie de Beer	17/05/2018 21/05/2018	Email received 17/05/2018 ask that a “comments and response form” be sent to him.	Email sent 21/05/2018 with a “comments and response form” attached.	
		21/05/2018	Email received 21/05/2018 states that he will fill in the form and send it back to Milnex 189 CC.		
		22/05/2018	Email received on 22/05/2018 with “ <i>comments and response form</i> ” attached. The “ <i>comments and response form</i> ” state the following: <ul style="list-style-type: none"> • “<i>Three of the title deeds is my property.</i>” • <i>One is in process to be bought.</i> • <i>One I have been leasing for 18 years – in a purchase agreement.</i> <p><i>Please send project information after which I will comment on the information. Currently this property is one operational farm and our properties that are not included in the application is dependent on the properties that are included for water, electricity, etc. I will drastically have to look at how this will influence my farm and rental house.”</i></p>		
		22/05/2018	Email received on 22/05/2018 states that this application will have an enormous impact on his farm, life and decision making	Email sent 22/05/2018 referred to the telephonic conversation and said he can contact Mr. Gerhard Laufs. He will be able to help him with a surface use agreement between him and the applicant. Attached to the email is the final Scoping Report and it is mentioned that he should expect a CD in the post as everything is to big to send via email.	

		22/05/2018		Email sent 22/05/2018 states that the attached document is the 1st of 2 documents that needs to be submitted to the DMR. The 1st document has already been submitted to the DMR, however he will have an opportunity to comment on the 2nd document. The public meeting was already held on the 24ste April 2018, however he is welcome to send comments.	
Lekker Sukkel Landgoed 1/454, 2/454	Chemstof Pty Ltd: Jeannette Kruger	24/05/2018	Email received 24/05/2018 from attorneys representing the landowner. Attached to the email is an objection letter. <u>The email state the following:</u> "We refer to the notice in relation to application NW30/5/1/1/2/11794 PR and now enclose an Objection for and on behalf of clients Chemstof Proprietary Limited and Platcro Minerals CC which we will also be lodging with the DMR in Klerksdorp." Please see the objection letter attached under Appendix 6 (iii) .	Email sent 24/05/2018 acknowledges receipt of the objections.	Please note that if the EA is granted, a Section 102 Part 1 amendment will be submitted to exclude this landowner's property.
Zandfontein 369/447, 370/447, 371/447	Not available		No comments received yet		
Landowners or lawful occupiers on adjacent properties					
Bokfontein RE/52/448, 64/448, 65/448, 65/448, 66/448, 67/448, 68/448, RE/14/448	Chemstof Pty Ltd, Jeannette Kruger		Email received 24/05/2018 from attorneys representing the landowner. Attached to the email is an objection letter. <u>The email state the following:</u> "We refer to the notice in relation to application NW30/5/1/1/2/11794 PR and now enclose an Objection for and on behalf of clients Chemstof Proprietary Limited and Platcro Minerals CC which we will also be lodging with the DMR in Klerksdorp." Please see the objection letter attached under Appendix 6 (iii) .	Email sent 24/05/2018 acknowledges receipt of the objections.	
Bokfontein 321/448 Krokodil drift 548/446, 549/446	South African National Roads Agency Ltd Northern Region		No comments received		

Zandfontein 344/447					
Bokfontein 210/448	On behalf of the Republic of South Africa Department of Rural Development and Land Reform		No comments received		
Krokodildrift 131/446	Barplats Mines Ltd		No comments received		
Krokodildrift 132/446	S.P.D.M. Eiendomme CC		No comments received		
Krokodildrift RE/329/446	Nadine De Beer		No comments received		
Krokodildrift RE/417/446	Hendrik Cornelis Janse Van Rensburg		No comments received		
Krokodildrift RE/140/446	Petrus Johannes Mare		No comments received		
Krokodildrift 545/446	Not available		No comments received		
Zandfontein RE/40/447, RE/41/447	Gert Van Rensburg Familietrust		No comments received		
Zandfontein 401/447, 402/447	Not available		No comments received		
Zandfontein 42/447	Cecilia Trust		No comments received		
Zandfontein 48/447	Johannes Petrus De Beer		No comments received		
The Municipality in which jurisdiction the development is located					
Madibeng Local Municipality	Municipal Manager: Mr Morris Maluleka		No comments received		
Municipal councilor of the ward in which the site is located					

Madibeng Local Municipality	Ward 29 Councillor		No comments received		
Organs of state having jurisdiction					
Department of Rural, Environmental and Agricultural Development, North West (READ)	Mrs. Ellis Thebe	25/04/2018 15/05/2018	Letter dated 25/04/2018 states that the Department has received the request to comment and a hard copy must be submitted to Mr. Olebogeng Marobe. The file reference number is NWP/DMR/08/2018	A document was couriered on the 15/05/2018.	
	Mr. Olebogeng Marobe	26/06/218	<p>Email received 26/06/2018 with comments attached.</p> <p>2) Following the review of the Scoping Report, the department has note the that:</p> <ul style="list-style-type: none"> According to the Biodiversity sector plan 2015, portion 3 of the farm Lekker Sukkel Landgoed 454 JQ, portion 369, 370, 371, 372, 343 and the northern part of portion 226 of the farm Zandfontein 447 JQ fall within a Terrestrial Critical Biodiversity Area Type 2. Critical Biodiversity Area type 2 must be maintained in a natural or near natural state. Therefore, the department objects the proposed activity taking place in the above mentioned portions. <p>3) However, this Department has no objection to the proposed activity occurring in portions 1 and 2 of the farm Lekker Sukkel Landgoed 454 JQ, the farm Zandfontein 923 JQ and portion 44 (portion of portion 5), portion 45 (portion of portion 5), remaining extent of portion 46, (portion of portion 5) and remaining extent of portion 226 of the farm zandfontein 447 JQ.</p> <p>4) The Department recommends the following be included in the EIAR/EMP if scoping is accepted:</p> <ul style="list-style-type: none"> No prospecting should occur within wetland areas. Drip trays should always be available to collect any fluid that may result from accidental spillage, overflow and/or servicing. All equipment's that leak must be repaired immediately and/or removed from the site when necessary. 		

			<ul style="list-style-type: none"> All staff must be trained in emergency spill procedures and know where the spill kit is kept to prevent the minor spills from spreading. General waste must be collected and disposed of at a licensed landfill site regularly. The boundaries of footprint areas to be clearly defined in the final layout plan and it should be ensured all activities remain within defined footprint areas. 		
The Department of Water & Sanitation (DWS)	Cornia Theunissen	22/05/2018	Email received on 22/05/2018 with attached letter dated 18/05/2018. The letter acknowledges the receipt of the documents and Ms. Lethabo Ramashala and can be contacted. Comments would be forwarded in due time.	Email sent 22/05/2018 acknowledges receipt of email.	
	Theunissen Cornia	10/07/2018 20/09/2018	Email received with letter attached on 20/09/2018. The letter states the following: <i>This office acknowledges the receipt of your documents regards to the above-mentioned on 19 September 2018 (Task T427/2018). The office responsible for this area is: Ms Lethabo Ramashala and can be contacted at (012) 253-1026.</i> <i>Comments would be forwarded in due time.</i>	Proof of document couriered to the department requesting comments on 10/07/2018.	
NW Department of Agriculture (Dept. of Agric.)	To whom it may concern	25/04/2018		CD with letter posted on 25/04/2018, requesting comments.	
Provincial Heritage Resources Agency (PHRA) North West	Mr. Motlhabane Mosiane		No comments received		
Department of Public Works, Roads and Transport in NW (DPWRT)	HOD: Ms. Mulangaphuma		No comments received		
Department of Mineral Resources – North West (DMR)	Me. Linah Tshisevhe	13/04/2018	Letter dated 13/04/2018 acknowledges receipt of application and states the following: <u>Comment 3</u> Upon evaluation of such documents it was noted that the proposed amendment will trigger activities which falls under Listing Notice 2 of NEMA: EIA Regulation which did not form part of the granted EA. In light of the above, please note that		

			<p>this application is considered and will be processed as a new Environmental Authorisation application.</p> <p><u>Comment 4</u> Milnex 189 CC are requested to submit 2 hard copies of scoping report together with proof of public participation process undertaken to this office within 44 days from lodgement date of your application.</p> <p><u>Comment 5</u> Milnex 189 CC are requested to pay the shortfall amount of the prescribed application fee to the amount of R8000.00 in line with the proposed activities and submit proof of payment to this office within 30 days from the day of signing of this letter.</p> <p><u>Comment 6</u> Kindly also note your application has been assigned to Mrs. Linah Tshisevhe.</p>		
		13/04/2018	Email received on 13/04/2018 states that the outstanding amount to be paid for 11794 PR amendment is R9 000.00 (Including waste activities) considering that R2000.00 has already been paid.		
	Kholofelo Mocomie	25/05/2018	<p>Email received on 25/05/2018 with DMR letter and appeal attached.</p> <p>The DMR letter states the following: <i>“Attached hereto please find attached self-explanatory documents from Werksmans Attorneys on behalf of Platcro Minerals.</i></p> <p><i>Your detailed responses are therefore anticipated within 21 days of receipt of this notice. Please note that your failure to respond as aforesaid will result in our office processing the appeal, based exclusively on the documentation in our possession and without further notice.”</i></p> <p>Please see Appendix 6(iii) for the appeal from Werksmans Attorneys on behalf of Platcro Minerals.</p>	Email sent 25/05/2018 acknowledges receipt of email.	

	Linah Tshisevhe	31/05/2018		Email sent 31/05/2018 with attached proof of Section 102 application submitted.	
05/06/2018		<p>Email received 05/06/2018 with letter attached states the following:</p> <ol style="list-style-type: none"> 1) The DMR confirms receipt of the SR and plan of study for EIA on the 15th of May 2018. 2) The following information should be addressed in detail on EIA phase of this project: <ol style="list-style-type: none"> a) A draft EIR must be submitted to all other relevant authorities for comments and their comments including from I&APs must be included in the final EIAR to be submitted to this Department for consideration. b) All maps should be A3 paper size, must have legend, north point and printed in colour. Kindly also ensure that your locality map must show the location of the proposed activities in relation to the nearest town together with infrastructure within and around the proposed project area. c) All specialist studies specified during the SR must be undertaken and included in the EIAR. d) An EMPr for the construction and operational phases of the project must be developed to identify and mitigate potential environmental and social impacts associated with the proposed activity on the receiving environment. It must comply with the guideline as stipulated in Appendix 4 of the EIA Regulations, 2014. e) During the compilation of the EIR investigation must be conducted to determine if the proposed prospecting operation will trigger any water use activities. If any water use activity is triggered, consultation with the DWS must be done and the proof of such consultation must be included in the EIR to be submitted to the office. f) Considering that the proposed project is located on the land which is currently used for agriculture purposes. Your EIR must provide specific mitigation measures to minimise the impacts of your prospecting activities on the agriculture activities. 		<p>g) p13 h & i) All comments were included in the amended SR and I&APs had 30 days to provide comments. k) p75-77 l) SAHRA was consulted, page 42</p>	

			<p>g) The quantity of hydrocarbons to be stores on site must also be investigated to determine if it will not trigger the listed activities. If investigation revealed that a listed activity is trigger such activity must be assessed</p> <p>h) The office has noted that your newspaper advertisement was published on Brits Pos on the 20th April 2018 and the public meeting was held on the 24th April 2018 and your SR was received by this office on the 15th May 2018, this means that your Scoping Report was submitted to this office prior lapsing of the 30 days commenting period. This is a contradiction with Regulation 3 (8) of the EIAR, 2014 which states that <i>“any public participation process must be conducted for a period of at least 30 days”</i>.</p> <p>i) Page 21 item (f)(vi) of your SR is also misleading because it has specified that I&APs were given opportunity to raise comments within 30 days of advertisement. Considering that the advertisement was published on the 20th April 2018, the office concluded that the I&APs were given less than 30 days to comment on the Scoping report.</p> <p>j) The EIR & EMPr must be based on the specialist inputs therefore you are requested to conduct a Biodiversity specialist study.</p> <p>k) You are also requested to specify different specialist studies that will be conducted as stated on page 53 of the scoping report.</p> <p>l) You are also advised to consult with the Heritage Resources Agency (National office) and ensure that the proof of such consultation is submitted to this office. Kindly also ensure that the same procedure is used when the above organisation is consulted regarding the EIR to submitted to the office.</p> <p>3) Unless states otherwise, the comments specified on paragraph 2 (g), (h), (j), (i) and (m) above must be addressed and incorporated into the amended scoping report of which one (1) copy must be manually submitted to this office within 35 days from the date of signing of this letter.</p>		
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		13/07/2018	Email received 13/07/2018 states she will follow up with registry to get a stamped copy.	Email sent 13/07/2018 with proof attached that the outstanding money was paid.	
	J.H. Makhubela	21/08/2018	Email received 21/08/2018 with letter attached states the following: <i>"I confirm that your application for consent to amend your prospecting right to include permission to remove and dispose of minerals in terms of Section 102 of the Act has been acknowledged.</i> <i>Kindly be informed that your application has been forwarded to the relevant Sub-directorate i.e. Mine Economics and Mine Environmental Management. The said sub-directorates will correspond directly with you for any outstanding information required."</i>		
	K.K. Mocomie	11/09/2018	Email received 11/09/2018 with appeal letter attached. The letter states the following: Attached hereto please find self-explanatory documents from Werksmans Attorneys on behalf of Platcro Minerals CC. Your detailed response is therefore anticipated within 21 days of receipt of this notice. Please note that your failure to respond as aforesaid will result in our office processing the appeal, based exclusively on the documentation in our possession and without further notice.		
	Linah Tshisevhe	11/09/2018		Email sent 11/09/2018 with letter attached. The letter states the following: <i>Please find the commitment letter attached which binds Thabo-Gaelebale Mineral Resources (Pty) Ltd to enter into a surface use agreement with Mr. JP de Beer, landowner 3. He is the registered landowner of Portion 44 (Portion of Portion 5), Portion 45 (Portion of Portion 5) and Remaining Extent of Portion 46 (Portion of Portion 5) of the farm Zandfontein 447.</i>	

				<i>Also attached is the letter of consent signed by Mr. JP de Beer.</i>	
		14/09/2018	Email received 14/09/2018 acknowledges email.	<p>Email sent 14/09/2018 with letter attached. The letter states the following:</p> <p><i>Please note that a Surface Use and Compensation Agreement was signed between Thabo-Gaelebale Mineral Resources (Pty) Ltd and Mr. JP de Beer who is the registered landowner of Portion 44 (Portion of Portion 5), Portion 45 (Portion of Portion 5) and Remaining Extent of Portion 46 (Portion of Portion 5) of the farm Zandfontein 447.</i></p> <p><i>Attached is the first and last page of the above mentioned agreement, which was signed on 11 September 2018.</i></p>	
		11/10/2018 05/11/2018	<p>Email received on 11/10/2018 with letter attached. The letter had the following comments:</p> <p>Milnex 189 CC are required to address the following:</p> <ol style="list-style-type: none"> 2.1. According to the office assessment the hydrocarbons which shall be stored during the proposed prospecting operation has triggered activity number 4 under listing notice 2 therefore it must be listed on your EIA report. 2.2. Your EIR was not numbered correctly i.e. there is inconsistency on the numbering of your report which must be corrected. 2.3. Your EIR has specified that a total of eight (8) geological boreholes will be drilled during the proposed prospecting operation, however the surface area which will be covered/disturbed per each borehole was not provided. 2.4. It has come to our attention that READ has objected the proposed prospecting activities on Portion 3 of the farm Lekker Sukkel Landgoed 454 JQ, portion 369, 370, 371, 372, 343 and northern part of portion 226 of the farm Zandfontein 447 due to the fact that such area fall within a Terrestrial Critical Biodiversity Area Type 2, you are therefore required to address such 	<p>Email sent 05/11/2018 with bank Guarantee attached for the amount of R337 361.00.</p>	<p>2.1) p13 2.3) p82-83 & p89-90 2.4) p45-46 2.5) p51 2.6) p82 and p89</p>

			<p>objection and advise this office on how you intend to dealt with this matter.</p> <p>2.5. On page 38 of your EIR you have specified that, there are existing mining activities within the proposed prospecting area which were authorised by this Department, you are therefore require to clarify this matter.</p> <p>2.6. Kindly also note that your proposed quantum of financial provision to the amount of R217 472.00 as projected by yourselves was evaluated however, it was found to be unacceptable. The amount that this office has arrived at is R337 361.00 in accordance with the guideline document as published by this Department in 2005, the value-added tax 15% and total area which will affected by your proposed prospecting activities.</p>		
Department of Agriculture, Forestry, and Fisheries (DAF)	Mr. Maurice Vugeya & Mrs Mpho Gumula		No comments received		
Department of Rural development and Land reform	Mr. Lengane Bogatsu	03/04/2018		Emails dated 03/04/2018 is proof of land claims consultation.	
	Keabetswe Mothupi	25/06/2018 28/06/2018	Email received 28/06/2018 with letter attached states that the department acknowledges receipt of the request.	Email sent 25/06/2018 follows up on the land claims enquiry.	
		04/07/2018	<p>Email received 04/07/2018 with land claims letter attached.</p> <p><u>Letter 1</u> There are no land claims on the Remaining Extent of Portion 1, Portion 2 and Portion 3 (Portion of Portion 1) of the farm Lekker Sukkel Landgoed 454</p> <p><u>Letter 2</u> There is an existing land claim against Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447.</p> <p><u>Letter 3</u></p>	<p>Email sent 25/07/2018 states the following: Thank you for all the response letter.</p> <p><i>"Please note that there are two letters which are the same (Zandfontein 447) and the response letter for the below mentioned, is not attached.</i></p> <p>7) Remaining Extent of Portion 46 (portion of portion 5) of the farm Zandfontein 447, Registration Division: JQ, Title deed: T35989/2002</p> <p>8) Remaining Extent of Portion 226 of the farm Zandfontein 447, Registration Division: JQ, Title deed: T44145/1996</p>	

			There is an existing land claim against the farm Zandfontein 923, Portion 44 (Portion of Portion 5) and Portion 45 (Portion of Portion 5) of the farm Zandfontein 447.	9) <i>Portion 343 (portion of portion 41) of the farm Zandfontein 447, Registration Division: JQ, Title deed: T19169/2003</i> <i>May you please send me the response letter for the above mentioned."</i>	
Other–					
Bojanala Platinum District Municipality	Mr P Shikwane		No comments received		
WESSA (National Office)	To whom it may concern		No comments received		
South African Heritage Resources Agency (SAHRA)	SAHRA website	05/07/2018		The documents were uploaded onto the SHARA website for comments on 05/07/2018.	
	Natasha Higgitt	02/08/2018	Email received 02/08/2018 to notify Milnex 189 CC that comments has been issued. <u>SAHRA issued the following comments:</u> <i>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a Heritage Impact Assessment (HIA) inclusive of an Archaeological Impact Assessment (AIA) be conducted as part of the EIA phase of the EA Application process as per section 38(3) and 38(3) of the NHRA. No further assessment of palaeontological resources is required as the proposed development area is located in an area of insignificant sensitivity as per the SAHRIS PalaeoSensitivity map.</i> <i>Further comment will be issued upon receipt of the above, along with the draft EIA and appendices to be submitted to the SAHRIS application for review and comment.</i>		

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.

Type of environment affected by the proposed activity.

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

Geology and Soils

Bushveld Complex, Brits Graben, Merensky Reef

The mafic rocks of the Bushveld Complex host layers rich in platinum group elements (PGE), chromium and vanadium, and constitute the world's largest known resource of these metals and are collectively termed the Rustenburg Layered Suite (RLS).

The Critical Zone is characterized by regular rhythmic layering of cumulus chromite within pyroxenites, anorthosites, norites and olivine-rich rocks. It hosts virtually all economic mineralization encountered in the Bushveld Complex. The first economically significant cycle from a PGE perspective is the UG2 chromitite layer.

The Merensky Reef can also be traced along strike for 280 km and is estimated to contain 60 000 t of PGE to a depth of 1 200 m below surface.

Ecological habitat and landscape features

Vegetation

The proposed area falls within vegetation unit SVcb 6, which is known as the Marikana Thornveld. The Marikana Thornveld is part of the Central Bushveld Bioregion, which is a sub-bioregion for the Savanna Biome.

According to Mucina and Rutherford (2006:461), the Marikana Thornveld vegetation covers the North West and Gauteng Province: Occurs on plains from the Rustenburg area in the west, through Marikana and Brits to the Pretoria area in the east. This Thornveld is situated on an altitude of about 1050-1450m.

The vegetation & landscape features include open *Acacia karroo* woodland, occurring in valleys and slightly undulating plains, and some lowland hills. Shrubs are more dense along drainage lines, on termitaria and rocky outcrops or in other habitat protected from fire.

Some other important Taxa found on in the area:

Tall Tree: *Acacia burkei*.

Small Trees: *Acacia caffra* (d), *A. gerrardii* (d), *A. karroo* (d), *Combretum molle* (d), *Rhus lancea* (d), *Ziziphus mucronata* (d), *Acacia nilotica*, *A. tortilis* subsp. *heteracantha*, *Celtis africana*, *Dombeya rotundifolia*, *Pappea capensis*, *Peltophorum africanum*, *Terminalia sericea*.

Tall Shrubs: *Euclea crispa* subsp. *crispa* (d), *Olea europaea* subsp. *africana* (d), *Rhus pyroides* var. *pyroides* (d), *Diospyros lycioides* subsp. *guerkei*, *Ehretia rigida* subsp. *rigida*, *Euclea undulata*, *Grewia flava*, *Pavetta gardeniifolia*.

Low Shrubs: *Asparagus cooperi* (d), *Rhynchosia nitens* (d), *Indigofera zeyheri*, *Justicia flava*.

Woody Climbers: *Clematis brachiata* (d), *Helinus integrifolius*.

Herbaceous Climbers: *Pentarrhinum insipidum* (d), *Cyphostemma cirrhosum*. Graminoids: *Elionurus muticus* (d), *Eragrostis lehmanniana* (d), *Setaria sphacelata* (d), *Themeda triandra* (d), *Aristida scabrivalvis* subsp. *scabrivalvis*, *Fingerhuthia africana*, *Heteropogon contortus*, *Hyperthelia dissoluta*, *Melinis nerviglumis*, *Pogonarthria squarrosa*.

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Herbs: *Hermannia depressa* (d), *Ipomoea obscura* (d), *Barleria macrostegia*, *Dianthus mooiensis* subsp. *mooiensis*, *Ipomoea oblongata*, *Vernonia oligocephala*.

Geophytic Herbs: *Ledebouria revoluta*, *Ornithogalum tenuifolium*, *Sansevieria aethiopica*.

Mucina and Rutherford (2006:462) also states that the conservation of this thornveld type, is endangered with a target of 19%. Only 1% is statutorily conserved in, for example, Magaliesberg Nature Area. More conserved in addition in other reserves, mainly in De Onderstepoort Nature Reserve. Considerably impacted, with 48% transformed, mainly cultivated and urban or built-up areas. Most agricultural development of this unit is in the western regions towards Rustenburg, while in the east (near Pretoria) industrial development is a greater threat of land transformation. Erosion is very low to moderate. Alien invasive plants occur localised in high densities, especially along the drainage lines.

See Appendix 8 & Figure 6 for the Ecological desktop study done.

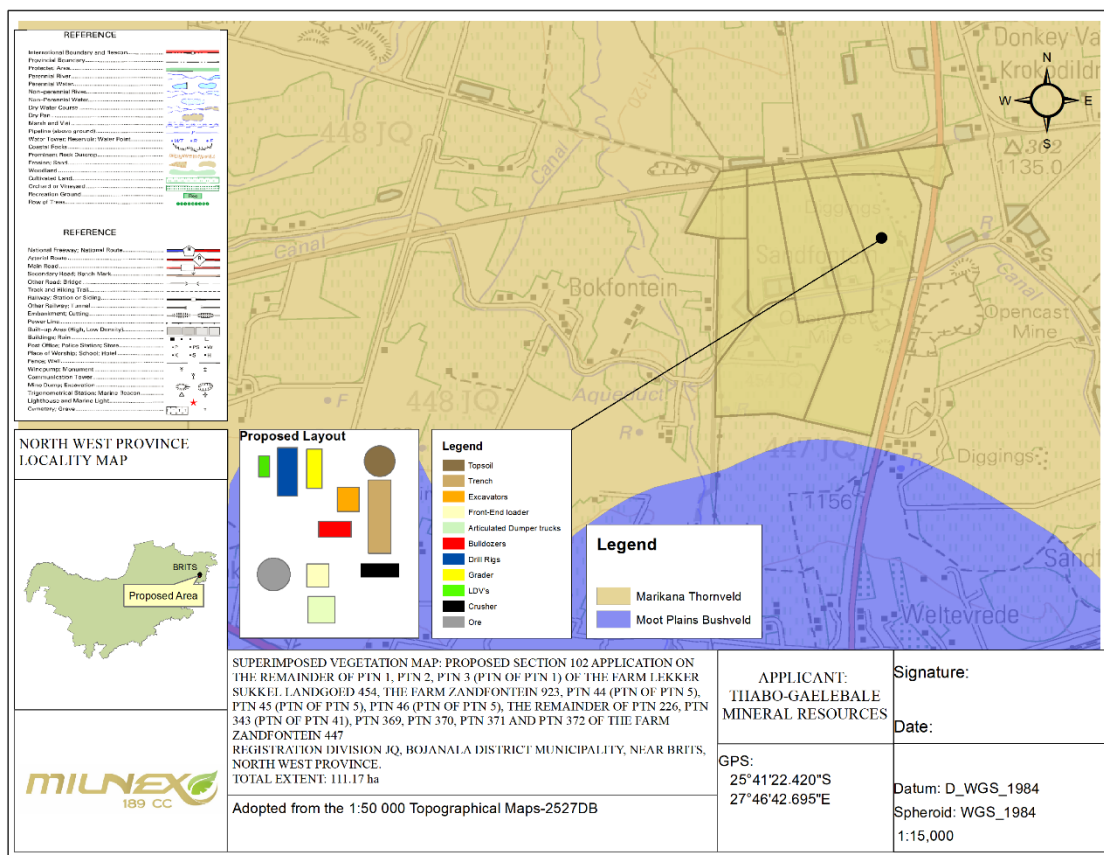


Figure 6: Vegetation Unit Map

Protected Areas

According to the data for protected areas the proposed portions falls within Marikana Thornveld Threatened Ecosystem.

The specialist study conducted by P.J du Preez state that according to the National List of Threatened Terrestrial Ecosystems (2011) the study area does fall partly in a threatened ecosystem namely the Marikana Thornveld (SVcb 6) and according to the National Biodiversity Assessment (2011), the study area is not located within either a formal or an informal protected area, but the project site is situated within a 5km protected areas buffer

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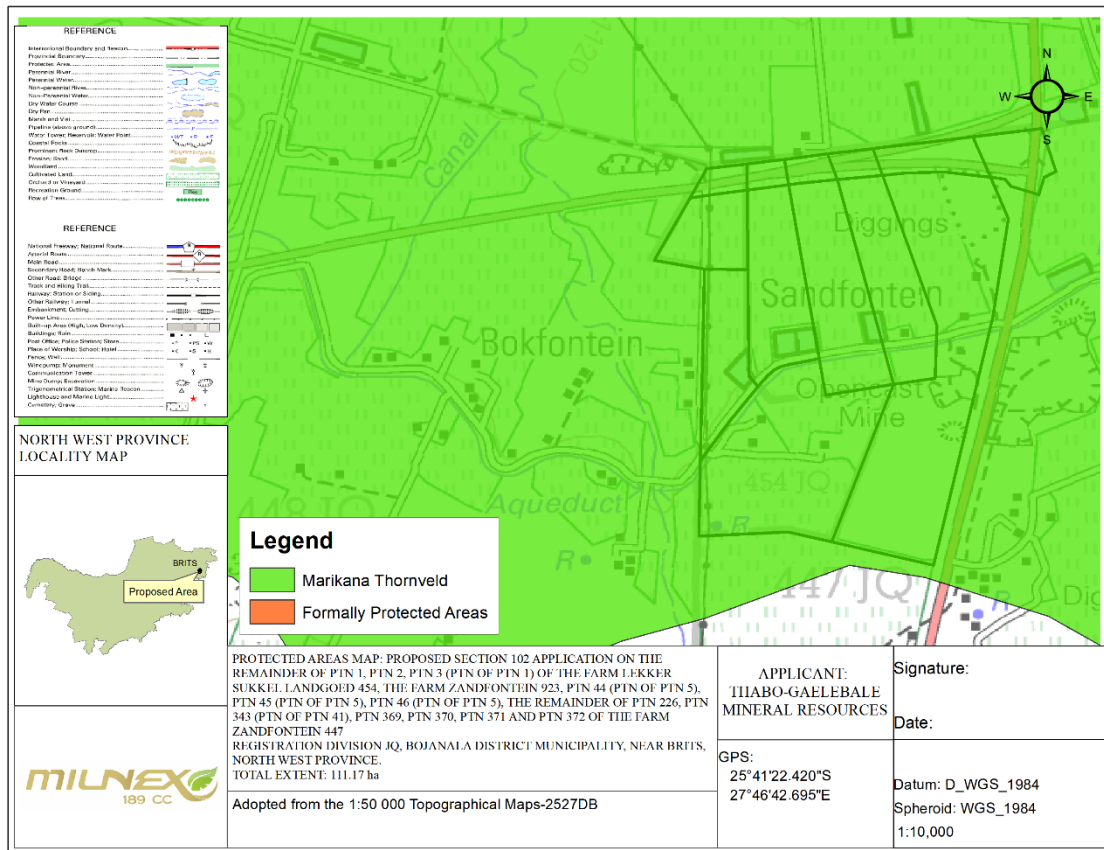


Figure 7: Protected Area map

Protected species

According to the specialist study conducted by P.J du Preez, no protected species in terms of the National Threatened species list, the National Forest Act (Act 84 of 1998) and the Northwest Nature Conservation Ordinance (Act 12 of 1983) were noted on the project site.

Critical Biodiversity Area

The Department of Rural, Environmental and Agriculture Development (READ) defines Critical Biodiversity Areas and Ecological Support Areas as follows:

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.

Ecological Support Areas (ESAs) are terrestrial and aquatic areas that are not essential for meeting biodiversity representation targets (thresholds), but which nevertheless play an important role in supporting the ecological functioning of critical biodiversity areas and/or in delivering ecosystem services that support socio-economic development, such as water provision, flood mitigation or carbon sequestration. The degree or extent of restriction on land use and resource use in these areas may be lower than that recommended for CBAs.

According to the data for Critical Biodiversity Areas, the proposed area falls within CBA type 2 and ESA type 2. According to the North West Biodiversity Sector Plan (2015) the land management objectives for above mentioned are as follows:

However, according to the specialist study conducted by P.J du Preez according to North West Biodiversity Plan (2015) the majority of the property falls within an area that is classified as Ecological Support Areas (ESA1 & 2) but the site assessment revealed that

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entire project site has been transformed into either crop fields or mine areas – the project site is in a degraded condition with no natural plant communities left.

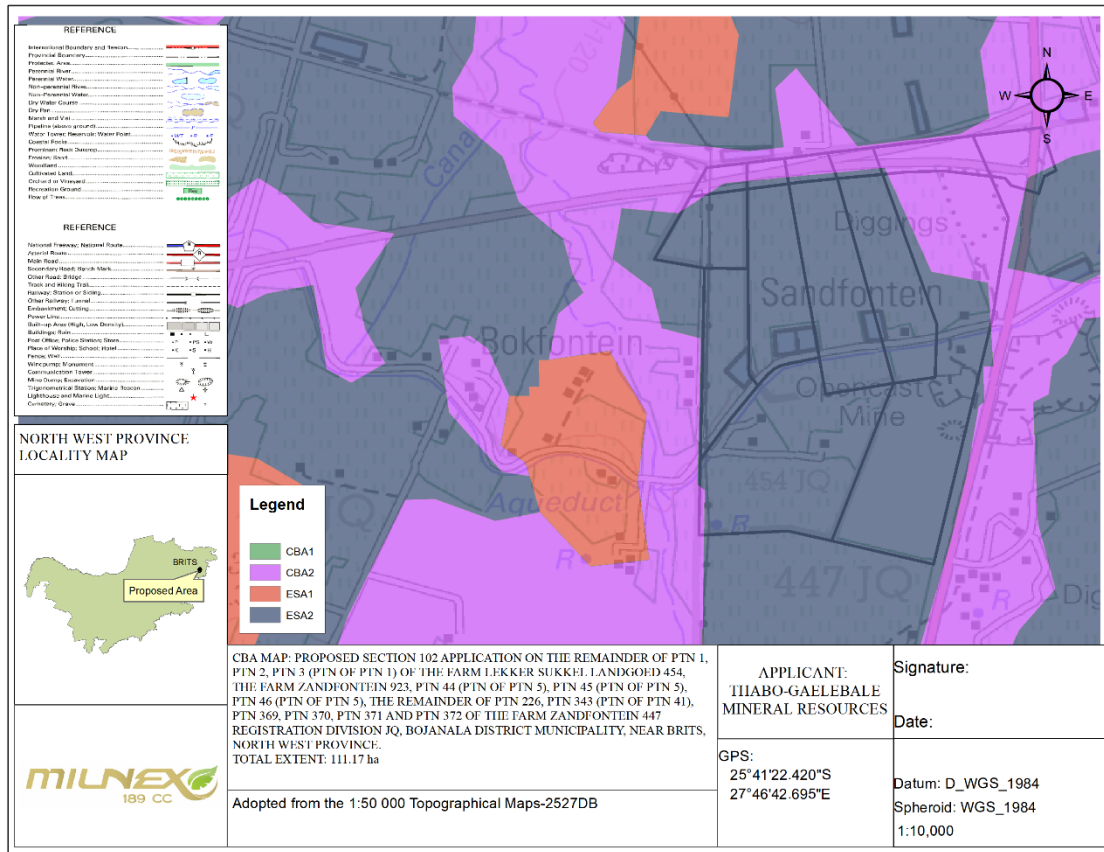


Figure 8: Critical Biodiversity Areas Map.

Sensitive area for Mine

According to the Mining of Biodiversity Guidelines, biodiversity priority areas sensitive to the impacts of mining are categorized into four categories (please see the table below).

Category	Description
A	Legally protected
B	Highest biodiversity importance
C	High biodiversity importance
D	Moderate biodiversity importance

The purpose is to identify and categorize biodiversity priority areas sensitive to the impacts of mining in order to support mainstreaming of biodiversity issues in decision making in the mining sector.

According to the mine guide map, a certain area of the proposed area falls within category B and C. The biodiversity priority areas are as follows:

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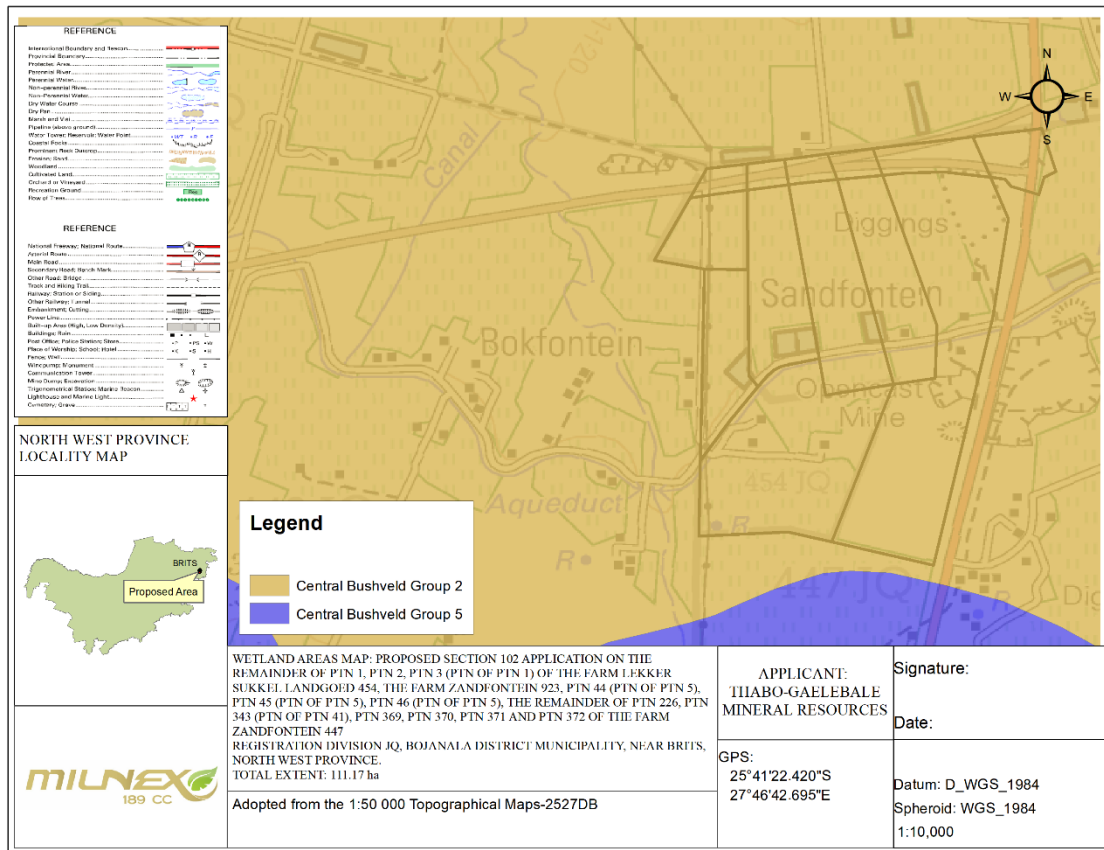


Figure 11: Wetland vegetation type

Land capability and agricultural potential

- Climate and water availability

Brits normally receives about 540mm of rain per year, with most rainfall occurring mainly during mid summer. The chart below (lower left) shows the average rainfall values for Brits per month. It receives the lowest rainfall (0mm) in June and the highest (105mm) in January. The monthly distribution of average daily maximum temperatures (centre chart below) shows that the average midday temperatures for Brits range from 19.8°C in June to 29.3°C in January. The region is the coldest during July when the mercury drops to 2.1°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, 2017).

Description of the socio-economic environment

PRIMARY ECONOMY

Agriculture, Tourism and mining are the main primary economies. The Agricultural sector, which produces food, is the biggest primary economy. It is categorized into four classifications, namely, extensive farming (44% of the Municipal area), intensive agriculture (18%), game farming (10%) and subsistence farming. Tourism also plays a major economic role as it is based on the natural systems (11%). Scenic routes, heritage sites, resorts and nature reserves are some of the main attractions in the tourism sector.

The mining sector is dominated by platinum and chromium mining as well as quarrying activity. Platinum mining activity is located on the south eastern side of the side of Brits while quarrying is spread around the municipal area. The primary economic activities have to be managed in such a manner as to make sure that their impact on the natural environment and resources is controlled.

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SECONDARY ECONOMY

Secondary economy refers to activities involved in the manufacturing of finished goods. The secondary sector is understood to include all manufacturing, processing, and construction. Activities associated with the secondary economy include metal working, smelting, automobile production, textile production, chemical industries, engineering industries, manufacturing, energy utilities, breweries, bottlers, and construction.

Secondary economic activities are normally linked to the primary economic activity. Thus secondary activity in Madibeng Local Municipality is in alignment with agricultural processing without the exclusion of manufacturing and construction. These activities are located in Brits, along the N4 Highway as well as a lesser activity scale in Lethlabile.

TERTIARY ECONOMY

The tertiary sector of the economy is largely associated with service industries. This sector provides services to both the general population and businesses. Activities that are commonly associated with tertiary economy include retail and wholesale sales, transportation, distribution, entertainment, restaurants, clerical services, media, tourism, insurance, banking, healthcare and law.

In most developed and developing countries, a growing proportion of workers are devoted to the tertiary sector. The N4 Highway plays a significant role within the transport, logistics and distribution activities within the municipal area. The N4 facilitates transport linkages between Rustenburg, Tshwane and Johannesburg.

Brits is the administrative capital of the municipality, bearing the bulk of municipal and government services. The Pelindaba nuclear facility also forms part of the government services. It is located on the south eastern side on the municipal area.

STATISTICAL OVERVIEW

A demographic statistical overview, as per census 2011, follows in the table below:

Population Size Census 1996 Census 2001 Census 2011	319 974 347 578 477 381	Population group Black African Coloured Indian or Asian White	426 192 4 292 2 445 42 691
Average annual Growth Rate	3.17%	Population (Area km ²)	3839
Population density	124 per km ²	Sex Ratio (Males/100 Females)	114
Number of Households	160 724	Dependency ration	0.44
Average Household Size	3.00	Female headed hh	30.3%
Gender Distribution: Male Female	53% 47%	Age Distribution/ Structure: Young (0-14 Years) Working age (5-65 Years) Eldery (Older than 65 Years)	25.70% 69.20% 5.10%
Employment Status - Persons 15 to 65 Years of Age: Employment Unemployment Youth Unemployment(15-34)	69.60% 30.40% 38.20%	Monthly Income levels: No Income Income up to R800 Income between R800-R 6500 Income above R6500	23.3% 27.3% 43.3 6.3%
Education levels - Persons Older Than 20 Years: No Schooling Some Primary to Secondary Schooling Grade 12 Higher	7.80% 57.30% 7.30% 27.60%	Formal dwellings 59.2% Housing owned/paid off 54.1% Flush toilet connected to sewerage 27.2%	Agricultural hh 23,621 Piped water inside dwelling 22.2% Electricity for lighting 81%
HIV 45.5% compared against North West Province prevalence rate of 26.7%			Weekly refuse removal 25.7%

(Madibeng Local Municipality, 2017:6)

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- Cultural and heritage aspects

Special attention was given to the identification of possible cultural or heritage resources on site. A specialist study was conducted by Francois P Coetzee and the following findings were made:

One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid-20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.

Also note that the water canal is part of the Crocodile River water supply scheme and do appear on maps dating to 1918. Construction of the project was finished in 1926. However, large sections of the canal have completely been rebuilt (several sections with new cement lining was observed within the survey area). As such it seems that most of the heritage value and significance of this aqueduct have been lost.

The palaeontological sensitivity map was extracted from the SAHRIS database and clearly shows grey (Insignificant/zero) sensitivity. As a result no desktop palaeontological study will be required for the survey footprint.

It is therefore recommended, from a cultural heritage perspective that the proposed prospecting activities may proceed.

Also, please note:

Archaeological deposits usually occur below ground level. Should archaeological artefacts or skeletal material be revealed in the area during development activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (cf. NHRA (Act No. 25 of 1999), Section 36 (6)).

Description of the current land uses.

The site survey revealed that land uses on and in the immediate vicinity of the proposed development are essentially comprised of natural land and to a lesser extent cultivation.

Below is the land cover of the proposed area which consist mostly of Cultivation and to a lesser extent Natural Vegetation and Waterbodies. Since this application is to amend the existing prospecting right which was authorised by the Department of Mineral Resources, there are prospecting activities present on the site.

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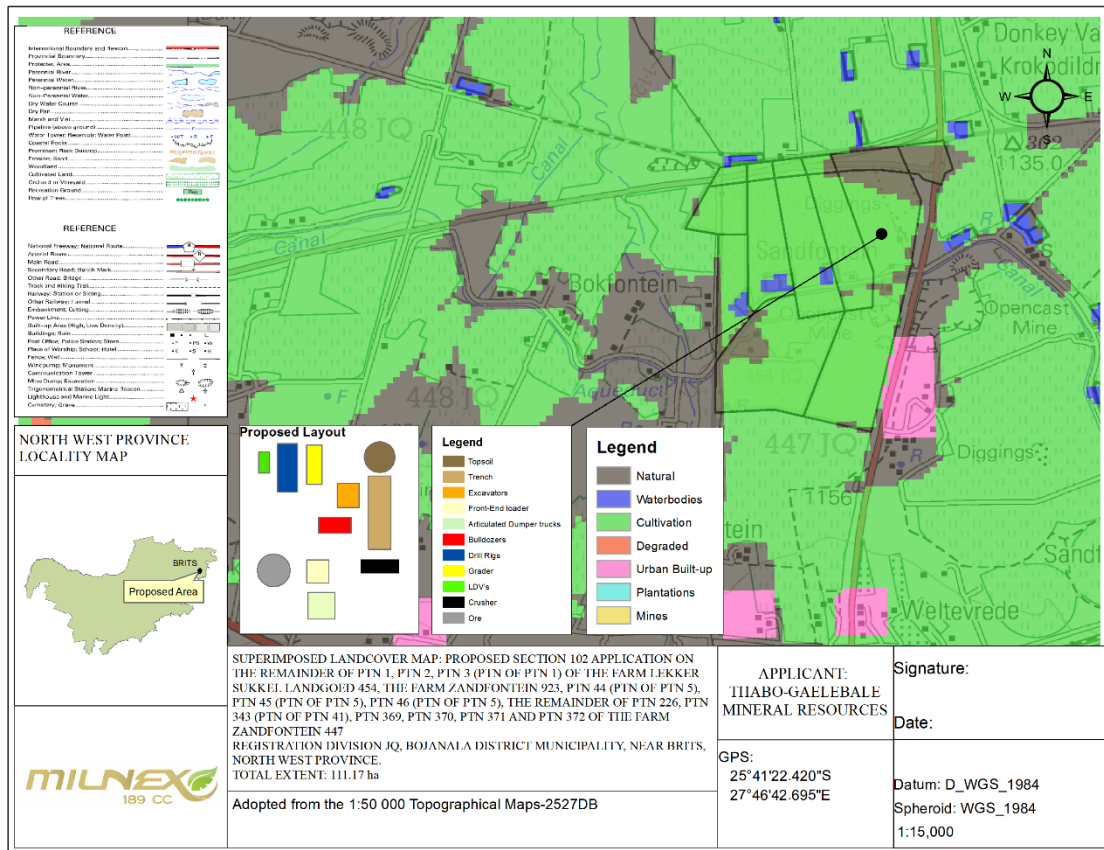


Figure 12: Land cover

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

- (aa) can be reversed;
- (bb) may cause irreplaceable loss of resources; and
- (cc) can be avoided, managed or mitigated;

Significance of potential impacts

The following sections present the outcome of the significance rating exercise. The results suggest that the 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 the specialist study:

According to the National List of Threatened Terrestrial Ecosystems (2011) the study area does fall partly in a threatened ecosystem namely the Marikana Thornveld (SVcb 6).

According to the National Biodiversity Assessment (2011), the study area is not located within either a formal or an informal protected area, but the project site is situated within a 5km protected areas buffer

According to Mucina & Rutherford (2006) the project site is situated in the Marikana Thornveld (SVcb 6). To the south of the project site is the Moot Plains Bushveld (SVcb 8).

According to North West Biodiversity Plan (2015) the majority of the property falls within an area that is classified as Ecological Support Areas (ESA1 & 2) but the site assessment revealed that entire project site has been transformed into either crop fields or mine areas – the project site is in a degraded condition with no natural plant communities left.

No protected species in terms of the National Threatened species list, the National Forest Act (Act 84 of 1998) and the Northwest Nature Conservation Ordinance (Act 12 of 1983) were noted on the project site.

Loss or fragmentation of indigenous natural fauna and flora	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (1)	Local (1)
Probability	Possible (1)	Unlikely (1)
Duration	Long-term (3)	Long-term (3)
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 impacts (3)	
Significance	Negative low (24) Negative low (12)	
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 EMPr also provides numerous mitigation measures – refer to section (f) of the EMPr.</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; 	

	<ul style="list-style-type: none"> All areas disturbed by construction related activities, such as access roads on the site, construction platforms, workshop area etc., should be rehabilitated at the end of the construction phase; The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed. Specifications for the rehabilitation are provided throughout the EMPr – section (f) of the EMPr. The implementation of the Rehabilitation Programme should be monitored by the ECO.
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- Loss destruction or fragmentation of habitats – According to the specialist study the project site is in a degraded condition with no natural plant communities left

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	Unlikely (1)	Unlikely (1)
Duration	Long term (3)	Long term (3)
Magnitude	Low (1)	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	Low cumulative impacts (2)	
Significance	Negative low (11)	Negative low (11)
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 cultivation potential being lost.

Loss of topsoil	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Geographical extent	Local (2)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Long term (3)	Medium term (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant (3)	Marginal (2)
Cumulative impact	Medium cumulative impacts (3)	
Significance	Negative medium (48)	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 should first be stripped from the entire surface and stockpiled for re-spreading during rehabilitation. 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 crop production 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	Probable (3)	Unlikely (1)
Duration	Medium term (2)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Marginal (2)	Marginal (2)
Cumulative impact	Medium cumulative impact (2).	
Significance	Negative low (26)	Negative low (9)
Can impacts be mitigated?	<ul style="list-style-type: none"> • The following mitigation or management measures are provided: Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. • Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly. <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 EMP.</p>	

- 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). There are other mining activities in the vicinity of the proposed application.

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)

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Duration	Medium term (1)	Medium 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 impact (2).	
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.	

- 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	Medium term (1)	Medium 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 – Special attention was given to the identification of possible cultural or heritage resources on site. A specialist study was conducted by Francois P Coetzee and the following findings were made:

One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid-20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.

Also note that the water canal is part of the Crocodile River water supply scheme and do appear on maps dating to 1918. Construction of the project was finished in 1926. However, large sections of the canal have completely been rebuilt (several sections with new cement lining was observed within the survey area). As such it seems that most of the heritage value and significance of this aqueduct have been lost.

The palaeontological sensitivity map was extracted from the SAHRIS database and clearly shows grey (Insignificant/zero) sensitivity. As a result no desktop palaeontological study will be required for the survey footprint.

It is therefore recommended, from a cultural heritage perspective that the proposed prospecting activities may proceed.

Also, please note:

Archaeological deposits usually occur below ground level. Should archaeological artefacts or skeletal material be revealed in the area during development activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (cf. NHRA (Act No. 25 of 1999), Section 36 (6)).

Impacts on heritage objects	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)

Probability	Possible (2)	Possible (2)
Duration	Short term (1)	Short term (1)
Magnitude	High (3)	Medium (2)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Marginal loss of resources (2)	No loss of resource (1)
Cumulative impact	The impact would result in negligible to no cumulative effects (1).	
Significance	Negative medium (36)	Negative low (22)
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 a gravel road off the R512. The movement of heavy vehicles along this road is likely to damage the road surface and impact on other road users. However, the R512 will only be used if necessary since several gravel road transverse the proposed area. The contractor should be required to ensure that damage to the gravel road is repaired periodically. The impact on the R512 is therefore likely to be low and high on the gravel roads.

Increase in vehicle traffic	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Probable (3)	Possible (2)
Duration	Medium term (2)	Medium term (2)
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 (36)	Negative low (20)
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 roads off the R512 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. 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)	Site (1)
Probability	Possible (2)	Unlikely (1)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Low cumulative effects (2), provided losses are compensated for.	
Significance	Negative low (22)	Negative low (8)
Can impacts be mitigated?	<p>Key mitigation measures include:</p> <ul style="list-style-type: none"> • Thabo-Gaelebale Mineral Resources (Pty) Ltd 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 Thabo-Gaelebale Mineral Resources (Pty) Ltd 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; • Thabo-Gaelebale Mineral Resources (Pty) Ltd 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 losses 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 Thabo-Gaelebale Mineral Resources (Pty) Ltd 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 Thabo-Gaelebale Mineral Resources (Pty) Ltd must ensure that construction workers who are found guilty of trespassing, stealing livestock and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation; • The housing of construction workers on the site should be strictly limited to security personnel (if any). 	

- 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, 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
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Status (positive or negative)	Negative	Negative
Extent	Region (3)	Local (2)
Probability	Probable (3)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	Very high (4)	Low (1)
Reversibility	Partly reversible (2)	Completely reversible (1)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Negligible cumulative effects (1), provided losses are compensated for.	
Significance	Negative medium (56)	Negative low (10)
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 a 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 (2)	Site (1)
Probability	Probable (3)	Possible (2)
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	Low cumulative effects (2), 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 medium (26)	Negative Low (11)

Can impacts be mitigated?	<p>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.</p> <ul style="list-style-type: none"> The following mitigation or management measures are provided: Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly <p>Also refer to section (f) of the EMP.</p>
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- Change in land-use** – The proposed area will still be used for cultivation. However, it might be restricted to certain areas. The impact on farm income due to the loss of crop production will be more than offset by the income from **Thabo-Gaelebele Mineral Resources (Pty) Ltd.**

Change in land use	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	Low cumulative effects (2)	
Significance	Negative medium (22)	Negative low (22)
Can impacts be mitigated?	<p>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 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>	

- Generation of alternative land use income** – Income generated through the Chrome ore and Platinum Group Metals (PGM), 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)	Local (2)
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 (26)
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
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Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Probable (3)	Unlikely (1)
Duration	Long term (3)	Medium term (2)
Magnitude	Medium (2)	Low (1)
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 cumulative impacts on the wider area.	
Significance	Negative medium (32)	Negative low (11)
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 20 000 litres of water per day will be required for Drinking water & Ablution, Drilling (Drill Rigs) and Dust Suppression. The water will be sourced from groundwater sources.

Increased consumption of water	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Definite (4)	Definite (4)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resources (2)
Cumulative impact	Medium cumulative impacts (2) - An additional demand on water sources could result in a significant cumulative impact with regards to the availability of water.	
Significance	Negative medium (34)	Negative medium (32)
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)

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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, crushers and screeners, etc. 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)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	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 (18)
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** – There are no tourist facilities in close proximity to the proposed area.

Potential impacts on tourism	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Site (1)
Probability	Possible (2)	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 (7)	Negative low (5)
Can impacts be mitigated?		

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 previous usage, cultivation.

Rehabilitation of the physical environment	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	High (3)
Reversibility	N/A	N/A
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	
Significance	Positive low (27)	Positive low (27)
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	Medium term (2)	Short term (1)
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 (30)	Negative low (18)
Can impacts be mitigated?	The following mitigation measures are recommended: <ul style="list-style-type: none"> All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning; Thabo-Gaelebele Mineral Resources (Pty) Ltd 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 surveys 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 within the area resulting in the possible destruction and disturbance of fauna and flora.
- Poor access control to farms which may impact on livestock 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).

Negative impacts on vegetation, soil and the water resources 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 these potential impacts.

Noise

Site activities must take place during the day (06:00 – 18:00) to avoid night time noise disturbances and night time collisions with fauna.

Visual impact

Dust suppression measures must be implemented.

Soil

- Disturbances to soil should be limited as far as possible.
- Topsoil should be stockpiled in a proper manor and no alien invasive species should be allowed to grow on the stockpiles.
- Erosion control measures should be implemented if necessary.
- Oils and lubricants must be stored in lined containment structures.
- Drip trays should be used where necessary.
- Waste bins should be provided and waste should be removed and disposed of at a licensed landfill site.
- Rehabilitation should be done concurrently.

Water

- Before any water is abstracted, a geo-hydro study should be conducted in order to determine the specific yield.
- Oils and lubricants must be stored in lined containment structures.
- Drip trays should be used where necessary.
- Erosion control measures should be implemented if necessary.

ix) Motivation where no alternative sites were considered.

As discussed in the previous section, based on outcomes of previous studies in the vicinity of the proposed site, and the granted prospecting right, the possibility to encounter further Chrome ore and Platinum Group Metals (PGM), on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province, was identified.

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

The site is preferred due to its possibility of having Chrome ore and Platinum Group Metals (PGM) because of the existing prospecting right granted on the proposed area. The property is also suitable for cultivation.

1) 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 wetland areas map a Flat wetland, Unchannelled valley-bottom wetland and Valleyhead seep are present on the proposed area. A canal runs through the proposed area as well.
II. A conservation or open space area		X		None.
III. An area that is of cultural importance			X	
IV. Site of geological significance			X	
V. Areas of outstanding natural beauty		X		None
VI. Highly productive agricultural land			X	The proposed area falls within land capability Class 3 and used for crop production.
VII. Floodplain		X		None

VIII. Indigenous forest		×		According to the specialist study there is none.
IX. Grass land		×		According to the specialist study there is none
X. Bird nesting sites		×		According to the specialist study there is none
XI. Red data species		×		According to the specialist study there is none
XII. Tourist resort		×		None.
2. Will the project potentially result in potential?				
I. Removal of people		×		None.
II. Visual Impacts	×			The visual impact will be managed.
III. Noise pollution	×			The noise impact will be managed.
IV. Construction of an access road		×		Access will be obtained from a gravel road off the R512 or N4.
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.			×	
VI. Accumulation of large workforce (>50 manual workers) into the site.			×	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.		×		Approximately 20 000 litres of water will be used per day.
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.
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 wetland areas map a Flat wetland and Unchannelled valley-bottom wetland is near the proposed site.
II. A conservation or open space area			×	
III. An area that is of cultural importance			×	
IV. A site of geological significance		×		None
V. An area of outstanding natural beauty		×		None.
VI. Highly productive agricultural land			×	The area around the proposed area falls within land capability Class 3
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.
- **Mitigation:** Impacts need to be mitigated to minimise the effect on the environment.

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

LISTED ACTIVITY (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									
Listing Notice GNR 325, Activity 15: "The clearance of an area of 20 hectares or more, of indigenous vegetation."	Site clearing and preparation 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. 	-		M	Yes	-
			Air	<ul style="list-style-type: none"> Air and dust pollution due to the increase of traffic of construction vehicles. 	-		S	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. 	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. 	-		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. 		-	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 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. 		-	S	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are not tourism facilities in close proximity to the site, the construction activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	-

			Heritage resources	<ul 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>Listing Notice GNR 325, Activity 15: "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 and dust 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. Blasting may affect the geology 		-	L	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. 	-		M	Yes	-
			Ground water	<ul style="list-style-type: none"> Pollution due to construction vehicles Pollution due to blasting 	-		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 visual receptors in close proximity to proposed facility. 		-	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. 		-	S	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. 	-		S	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the construction activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	-
			Heritage resources	<ul 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	-
OPERATIONAL PHASE									

<p>Listing Notice GNR 325, Activity 19: "The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including—</p> <p>Listing Notice GNR 325, Activity 20: "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—</p> <p>NEM:WA 59 of 2008</p> <p>Residue stockpiles or residue deposits</p> <p>Category A: (15) The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a prospecting right or mining permit, in terms 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"> • Supporting Infrastructure - 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. • Roads – Access will be obtained from a gravel road off the R512. • Fencing - 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, transport of the gravel to the designated areas and possible blasting. 	-	-	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 (high significance relative to agricultural potential of the site). 	-	-	M	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. • Blasting 	-	-	L	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. 	-	-	M	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. • Pollution due to blasting 	-	-	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). • 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	-	
			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 cultivation 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. 	-	-	S	Yes	-
				Noise levels	<ul style="list-style-type: none"> • The proposed development will result in noise pollution during the operational phase. 	-	-	M	Yes	-

			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the operational activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	-		
			Heritage resources	<ul style="list-style-type: none"> It is not foreseen that the proposed activity will impact on heritage resources or vice versa. 	-		S	Yes	-		
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. 	-		S	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	N/A	-
					Heritage resources	<ul style="list-style-type: none"> It is not foreseen that the decommissioning phase will impact on any heritage resources. 	-		S	Yes	-

(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.
Cultural Heritage Impact Assessment	<p>A total of one historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid-20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.</p> <p>No archaeological (both Stone Age and Iron Age) artefacts, assemblages, features, structures or settlements were recorded during the survey of the project footprint. It is well known that Late Iron Age stone-walled settlements do not usually occur in open low-lying grasslands. Especially black cottons soils with a high clay content.</p> <p><i>The palaeontological sensitivity map was extracted from the SAHRIS database and clearly shows grey (Insignificant/zero) sensitivity. As a result no desktop palaeontological study will be required for the survey footprint.</i></p> <p>It is therefore recommended, from a cultural heritage perspective that the proposed prospecting activities may proceed.</p> <p>Also, please note: Archaeological deposits usually occur below ground level. Should archaeological artefacts or skeletal material be revealed in the area during development activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (cf. NHRA (Act No. 25 of 1999), Section 36 (6)).</p>	X	Page 38, 43, 65, 71, 89-90, 105-106

<p>Ecological Impact Assessment and Wetland Report</p>	<p>The following general conclusions were drawn upon completion of the literature review:</p> <ul style="list-style-type: none"> • The study area falls within the Bushveld Basin Aquatic Ecoregion, and it is situated in the 1010 quaternary catchment; • According to the NFEPA database the study area falls within the Crocodile (West) – Marico Water Management Area (WMA), and • the subWMA indicated for the study area is the Upper Crocodile; • The subWMA is not regarded important in terms of fish sanctuaries, rehabilitation or corridors; • The subWMA is not considered important in terms of translocation and relocation zones for fish; • The subWMA is not listed as a fish-FEPA; • The NFEPA database indicates that the unnamed stream which runs to the west of the project site is not NFEPA-listed; • The NFEPA database indicates that there are no RAMSAR wetlands within the study area or within 500m of the study area; • According to the National List of Threatened Terrestrial Ecosystems (2011) the study area does fall partly in a threatened ecosystem namely the Marikana Thornveld (SVcb 6). • According to the National Biodiversity Assessment (2011), the study area is not located within either a formal or an informal protected area, but the project site is situated within a 5km protected areas buffer • According to Mucina & Rutherford (2006) the project site is situated in the Marikana Thornveld (SVcb 6). To the south of the project site is the Moot Plains Bushveld (SVcb 8). • According to North West Biodiversity Plan (2015) the majority of the property falls within an area that is classified as Ecological Support Areas (ESA1 & 2) but the site assessment revealed that entire project site has been transformed into either crop fields or mine areas – the project site is in a degraded condition with no natural plant communities left. • No protected species in terms of the National Threatened species list, the National Forest Act (Act 84 of 1998) and the Northwest Nature Conservation Ordinance (Act 12 of 1983) were noted on the project site. <p>Upon completion of the riparian and wetland assessment the following general conclusions were drawn: A seasonal drainage line, situated outside and to the west of the project site, drains the landscape while small irrigation dams and an irrigation canal are present on the project site. These irrigation dams are kept full with water from the irrigation canal. There are also quarries on the project site which are partly filled with water.</p> <p>The following points summarise the results obtained:</p>	<p>X</p>	<p>Page 31-33, 35, 40, 41, 65, 95, 112</p>
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	<ul style="list-style-type: none">• These features were classified according to the Classification System for Wetlands and other Aquatic Ecosystems in South Africa. User Manual: Inland Systems (Ollis <i>et al.</i>, 2013), as Inland Systems falling within the Bushveld Basin Aquatic Ecoregion;• At Level 4 of the Classification System, the features within the study area were classified as: Rivers,• The Riparian Vegetation Response Index (VEGRAI) was applied to the riparian vegetation of the unnamed stream and irrigation dams as well as the old quarry. The results of this assessment indicate that the riparian vegetation associated with these features has undergone significant transformation over the years.		
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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 because according to the specialist study project site is in a degraded condition with no natural plant communities left. It should also be kept in mind that not the whole of 117.17 ha will be cleared. Only the areas where prospecting will occur will be cleared.

- Potential impact on heritage resources: A specialist study was conducted by Francois P Coetzee and the following findings were made:

One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid 20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.

Also note that the water canal is part of the Crocodile River water supply scheme and do appear on maps dating to 1918. Construction of the project was finished in 1926. However, large sections of the canal have completely been rebuilt (several sections with new cement lining was observed within the survey area). As such it seems that most of the heritage value and significance of this aqueduct have been lost.

It is therefore recommended, from a cultural heritage perspective that the proposed prospecting activities may proceed.

Should archaeological sites or graves be exposed during construction work, it must immediately be reported to a heritage practitioner so that an investigation and evaluation of the finds can be made.

- Potential impact on Palaeontological resources: According to the HIA conducted no desktop palaeontological study will be required for the survey footprint. However, should fossils be exposed during construction work, it must immediately be reported to a palaeontologist so that an investigation and evaluation of the finds can be made.
- Potential in groundwater amounts: Due to the water being abstracted from boreholes, groundwater resources will be depleted if not properly managed. Approximately 20 000 litres of water will be used per day. 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 cultivation. 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 Chrome ore and Platinum Group Metals (PGM), 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.

A. Final Site Map

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

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

B. 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.

J. 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 Chrome ore and Platinum Group Metals (PGM), prospecting.
- Compliance with legislative requirements.
- Mine is neat and tidy and well managed.

K. 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, **Thabo-Gaelebale Mineral Resources (Pty) Ltd** would like to potentially prospect for Chrome ore and Platinum Group Metals (PGM), on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province, therefore there will be no other alternative (i.e. to facilitate the movement of machinery, equipment, infrastructure).

L. ASPECTS FOR INCLUSION AS CONDITIONS OF AUTHORISATION.

Any aspects which have not formed part of the EMP that must be made conditions of the Environmental 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.

M. 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. If the authority feels that specialists' studies need to be conducted, such will be corresponded to the applicant.

N. 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 Chrome ore and Platinum Group Metals (PGM) mines in the area and the granted prospecting right on the proposed area, the possibility to encounter further Chrome ore and Platinum Group Metals (PGM), were identified.

The proposed prospecting area is targeted as, historically, several Chrome ore and Platinum Group Metals (PGM), occurrences are known in the area, and a number of these have been exploited in the past. There are also various Chrome ore and Platinum Group Metals (PGM), operations within the vicinity of the prospecting area.

The option of not approving the activities will result in a significant loss to valuable Chrome ore and Platinum Group Metals (PGM), being exploited. And all economic benefits will be lost.

O. 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 5 years.

C. UNDERTAKING

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

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

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

- 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:

06 – 11 – 2018

Date:

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

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: Thabo-Gaelebale Mineral Resources (Pty) Ltd		Ref No.: NW30/5/1/1/2/11794PR					
Evaluators: Milnex 189 CC		Date: 31/08/2018					
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 (including overland conveyors and power lines)	m3	200	14,05	1	1	2810
2 (A)	Demolition of steel buildings and structures	m2	0	195,76	1	1	0
2(B)	Demolition of reinforced concrete buildings and structures	m2	0	288,49	1	1	0
3	Rehabilitation of access roads	m2	150	35,03	1	1	5254,5
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	340,01	1	1	0
4 (A)	Demolition and rehabilitation of non-electrified railway lines	m	0	185,46	1	1	0
5	Demolition of housing and/or administration facilities	m2	0	391,53	1	1	0
6	Opencast rehabilitation including final voids and ramps	ha	1,867	205242,16	0,04	1	15327,48451
7	Sealing of shafts adits and inclines	m3	0	105,09	1	1	0
8 (A)	Rehabilitation of overburden and spoils	ha	0	136828,1	1	1	0
8 (B)	Rehabilitation of processing waste deposits and evaporation ponds (non-polluting potential)	ha	0,2	170416,93	1	1	34083,386
8 (C)	Rehabilitation of processing waste deposits and evaporation ponds (polluting potential)	ha	0	494971,55	1	1	0
9	Rehabilitation of subsided areas	ha	0,2	114572,93	1	1	22914,586
10	General surface rehabilitation	ha	0,3	108390,94	1	1	32517,282
11	River diversions	ha	0	108390,94	1	1	0
12	Fencing	m	52	123,64	1	1	6429,28
13	Water management	ha	0	41213,28	1	1	0
14	2 to 3 years of maintenance and aftercare	ha	2,567	14424,65	1	1	37028,07655
15 (A)	Specialist study	Sum	0			1	0
15 (B)	Specialist study	Sum				1	0
Sub Total 1							156364,5951
1	Preliminary and General		18763,75141	weighting factor 2 1			18763,75141
2	Contingencies			15636,45951			15636,45951
Subtotal 2							190764,81
VAT (14%)							26707,07
Grand Total							217472

The department recalculated the quantum from R217 472.00 to R337 361.00 on the letter dated 10 October 2018. Thus, the applicant paid R337 361.00

It is envisaged that 8 Geological boreholes (80m deep) will be drilled, 16 trenches (10m x 1.8m x 2.5m) and 2 pits (1 pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m) will be dug. It may be less depending on results.

Boreholes

10m x 10 m = 100m² (size of area needed for drill rig and related equipment for drilling one borehole.)

100m² x 8 boreholes = 800m²

800m²/10 000 = 0.08ha

The area to be disturbed will be approximately 0.08ha

Trenches

117.17 ha - 10m x 1.8m x 2.5m (16 trenches) It is planned that 16 pits will be excavated in 3 years. It should be kept in mind that no more than 16 pits will be excavated. The total area to be disturbed will be- 16 pits x (10m x 1.8m) /10 000 = 0.0288ha.

Pits

It is envisaged that 2 pits will be dug. One pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m.

117.17 ha - 115m x 115m x 50m (1 pit) + 132m x 322m x 55m (1 pit) It is planned that the 2 pits will be excavated in 3 years.

It should be kept in mind that no more than 2 trenches will be excavated. The total area to be disturbed will be - 1 pits x (115m x 115m) / 10 000 + 1 pits x (132m x 322m) / 10 000 = 5.5729ha

Total area

Total area to be disturbed will be 0.08ha + 0.0288 ha + 5.5729ha = 5.6817ha

5.6817ha / 3 years = 1.8939ha.

No more than 3.7878 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.

- i) **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 **Thabo-Gaelebale Mineral Resources (Pty) Ltd**, submitted together with the application for a prospecting right.

Rehabilitation Fund

Thabo-Gaelebale Mineral Resources (Pty) Ltd 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 Chrome ore and Platinum Group Metals (PGM), 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 Chrome ore and Platinum Group Metals (PGM), 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).

Special attention was given to the identification of possible cultural or heritage resources on site. A specialist study was conducted by Francois P Coetzee and the following findings were made:

One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid 20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.

Also note that the water canal is part of the Crocodile River water supply scheme and do appear on maps dating to 1918. Construction of the project was finished in 1926. However, large sections of the canal have completely been rebuilt (several sections with new cement lining was observed within the survey area). As such it seems that most of the heritage value and significance of this aqueduct have been lost.

The palaeontological sensitivity map was extracted from the SAHRIS database and clearly shows grey (Insignificant/zero) sensitivity. As a result no desktop palaeontological study will be required for the survey footprint.

It is therefore recommended, from a cultural heritage perspective that the proposed prospecting activities may proceed.

Also, please note:

Archaeological deposits usually occur below ground level. Should archaeological artefacts or skeletal material be revealed in the area during development activities, such activities should be halted, and a university or museum notified in order for an investigation and evaluation of the find(s) to take place (cf. NHRA (Act No. 25 of 1999), Section 36 (6)).

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 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion

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41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province, is preferred based on the outcomes of other Chrome ore and Platinum Group Metals (PGM) mines in the area to encounter further Chrome ore and Platinum Group Metals (PGM).

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

1) Draft environmental management programme.

A. Details of the EAP

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

Name of Practitioner	Qualifications	Contact details
Lizanne Esterhuizen	Honours Degree in Environmental Science (refer to 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

- 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 **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 Chrome ore and Platinum Group Metals (PGM) 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 **Thabo-Gaelebale Mineral Resources (Pty) Ltd.**
 - 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 and/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.

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/11/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

CALCULATION OF THE QUANTUM

Applicant: **Thabo-Gaelele Mineral Resources (Pty) Ltd**
Evaluators: **Milnex 189 CC**

Ref No.: **NW30/5/11/2/11794PR**
Date: **31/08/2018**

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15 (A)	Specialist study	Sum	0			1	0
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Sub Total 1							156364,5951
1	Preliminary and General		18763,75141		weighting factor 2 1		18763,75141
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Subtotal 2							190764,81
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It is envisaged that 8 Geological boreholes (80m deep) will be drilled, 16 trenches (10m x 1.8m x 2.5m) and 2 pits (1 pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m) will be dug. It may be less depending on results.

Boreholes

10m x 10 m = 100m² (size of area needed for drill rig and related equipment for drilling one borehole.)

100m² x 8 boreholes = 800m²

800m²/10 000 = 0.08ha

The area to be disturbed will be approximately 0.08ha

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117.17 ha - 10m x 1.8m x 2.5m (16 trenches) It is planned that 16 pits will be excavated in 3 years. It should be kept in mind that no more than 16 pits will be excavated. The total area to be disturbed will be- 16 pits x (10m x 1.8m) /10 000 = 0.0288ha.

Pits

It is envisaged that 2 pits will be dug. One pit will be: 115m x 115m x 50m and the other pit will be 132m x 322m x 55m.

117.17 ha - 115m x 115m x 50m (1 pit) + 132m x 322m x 55m (1 pit) It is planned that the 2 pits will be excavated in 3 years. It should be kept in mind that no more than 2 trenches will be excavated. The total area to be disturbed will be - 1 pits x (115m x 115m) / 10 000 + 1 pits x (132m x 322m) / 10 000 = 5.5729ha

Total area

Total are to be disturbed will be 0.08ha + 0.0288 ha + 5.5729ha = 5.6817ha

5.6817ha / 3 years = 1.8939ha.

No more than 3.7878 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 **Thabo-Gaelebale Mineral Resources (Pty) Ltd**, submitted together with the application for the prospecting right.

Rehabilitation Fund

Thabo-Gaelebale Mineral Resources (Pty) Ltd 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 (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. For mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	PHASE (of operation in which activity will take place. State; Planning and design, Pre-Construction' Construction, Operational, Rehabilitation, Closure, Post closure).	SIZE AND SCALE of disturbance (volumes, tonnages and hectares or m ²)	MITIGATION MEASURES (describe how each of the recommendations in herein will remedy the cause of pollution or degradation and migration of pollutants)	COMPLIANCE WITH STANDARDS (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)	TIME PERIOD FOR IMPLEMENTATION 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 regard to Rehabilitation, therefore state either:- Upon cessation of the individual activity Or. Upon the cessation of mining, bulk sampling or Chrome ore and Platinum Group Metals (PGM) prospecting as the case may be.
Clearance of vegetation	Drilling, Pitting, Trenching and, if necessary, Blasting phase (construction and operation phase)	117.17 ha - Only the areas where prospecting takes place, will be cleared. No more than 8 Geological boreholes,16 trenches and 2 pits will be excavated. Please refer to PWP (Appendix 9)	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.	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.
Construction of roads	Drilling, Pitting, Trenching and, if necessary, Blasting phase (construction and operation phase)		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	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.

			<p>roads. Roads not to be used shall be marked with a "NO ENTRY for prospecting vehicles" sign.</p> <ol style="list-style-type: none"> 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 R31 is repaired continuously. The costs associated with the repair must be borne by the contractor; 6. Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport the gravel are fitted with tarpaulins or covers; 7. All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits. 		
Prospecting of Chrome ore and Platinum Group Metals (PGM) – Soils and geology	Drilling, Pitting, Trenching and, if necessary, Blasting phase (construction and operation phase)	117.17 ha - Only the areas where prospecting takes place, will be cleared. No more than 8 Geological boreholes, 16 trenches and 2 pits will be excavated. Please refer to PWP (Appendix 9)	<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. 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the mine

			<ol style="list-style-type: none"> 2. Care must be taken not to mix topsoil and subsoil or any other material, during stripping. 3. The topsoil must be conserved on site in and around 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, trenches or low brick walls around their bases. 6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding. 7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager. 8. The impact on the geology will be permanent. There is no mitigation measure. 		
Prospecting Chrome ore and Platinum Group Metals (PGM) – excavations	Drilling, Pitting, Trenching and, if necessary, Blasting phase (construction and operation phase)	117.17 ha - Only the areas where prospecting takes place, will be cleared. No more than 8 Geological boreholes, 16 trenches and 2 pits will be excavated.	<ol style="list-style-type: none"> 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. 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. 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting area

		<p>Please refer to PWP (Appendix 9)</p>	<ol style="list-style-type: none"> 3. Truck traffic should be routed away from noise sensitive areas, where possible. 4. Noise levels must be kept within acceptable limits. 5. Noisy operations should be combined so that they occur where possible at the same time. 6. Mine workers to wear necessary ear protection gear. 7. Noisy activities to take place during allocated hours. 8. Noise from labourers must be controlled. 9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site. 10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport. 11. Implementation of enclosure and cladding of processing plants. 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 ());

<p>ACTIVITY (whether listed or not listed).</p> <p>(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablation, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.).</p>	<p>POTENTIAL IMPACT</p> <p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc....etc...)</p>	<p>ASPECTS AFFECTED</p>	<p>PHASE In which impact is anticipated</p> <p>(e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)</p>	<p>MITIGATION TYPE</p> <p>(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc)</p> <p>E.g.</p> <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring • Remedy through rehabilitation.. 	<p>STANDARD TO BE ACHIEVED</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</p> <ol style="list-style-type: none"> 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. 5. There should be a preconstruction walk-through of the development footprint/project site in order to locate individuals of plant species of conservation concern. A search and rescue exercise must be done to locate and relocate any protected species to a suitable and similar habitat where these plants can grow without any disturbance; 6. 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>Rehabilitation</p>	<p>Minimisation of impacts to acceptable limits</p>

				<p>7. All damaged areas shall be rehabilitated upon completion of the contract.</p> <p>8. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction.</p> <p>9. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit.</p> <p>10. Rehabilitation must take place in a phased approach as soon as possible.</p> <p>11. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding.</p> <p>12. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</p> <p>13. 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>14. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan.</p> <p>15. The prospecting area must be well demarcated and no construction/prospecting activities must be allowed outside of this demarcated footprint.</p> <p>16. Vegetation removal must be phased in order to reduce impact of construction/prospecting.</p> <p>17. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.</p> <p>18. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas.</p> <p>19. 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>	
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				<p>20. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p>Exotic vegetation</p> <p>21. Alien vegetation on the site will need to be controlled.</p> <p>22. The Contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>23. The spread of exotic species occurring throughout the site should be controlled.</p> <p>24. Weed control measures must be applied to eradicate any noxious weeds (category 1a & 1b species) on disturbed areas.</p> <p>Herbicides</p> <p>25. 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>26. 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>27. Rehabilitation to be undertaken as soon as possible after the prospecting activities have been completed.</p> <p>28. No trapping or snaring to fauna on the construction/prospecting site should be allowed.</p> <p>29. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</p> <p>30. Any fauna threatened by the construction and operation activities should be removed to safety by the ECO or appropriately qualified environmental officer.</p>	
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				<p>31. All construction vehicles should adhere to a low speed limit (<30km/h) to avoid collisions with susceptible species such as snakes and tortoises.</p> <p>32. If trenches need to be dug for electrical cabling or other purposes, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are exposed should contain soil ramps allowing fauna to escape the trench.</p>	
Prospecting Chrome ore and Platinum Group Metals (PGM) – 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 or any other material, during stripping.</p> <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</p>	Minimisation of impacts to acceptable limits

				<p>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. 	
	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. Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. 4. Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly 5. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 6. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 7. Other erosion control measures that can be implemented are as follows: <ul style="list-style-type: none"> ○ Brush packing with cleared vegetation 	Minimisation of impacts to acceptable limits

				<ul style="list-style-type: none"> ○ Mulch or chip packing ○ Planting of vegetation ○ Hydroseeding/hand sowing <ol style="list-style-type: none"> 8. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 9. All erosion control mechanisms need to be regularly maintained. 10. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 11. Retention of vegetation where possible to avoid soil erosion. 12. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 13. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting activities are completed. This should be done through seeding with indigenous grasses. 14. No impediment to the natural water flow other than approved erosion control works is permitted. 15. To prevent stormwater damage, the increase in stormwater run-off resulting from construction/prospecting activities must be estimated and the drainage system assessed accordingly. 16. Stockpiles not used in three (3) months after stripping must be seeded or backfilled to prevent dust and erosion. 	
	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. 	Minimisation of impacts to acceptable limits

				<p>6. A speed limit of 30km/h must not be exceeded on site.</p> <p>7. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the Contractor.</p> <p>8. Any dirt roads that are utilised by the workers must be regularly maintained to ensure that dust levels are controlled.</p> <p>Odour control</p> <p>9. Regular servicing of vehicles in order to limit gaseous emissions.</p> <p>10. Regular servicing of onsite toilets to avoid potential odours.</p> <p>Rehabilitation</p> <p>11. The Contractor should commence rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks.</p> <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>	Minimisation of impacts to acceptable limits

				<ol style="list-style-type: none"> 5. Noisy operations should be combined so that they occur where possible at the same time. 6. Mine workers to wear necessary ear protection gear. 7. Noisy activities to take place during allocated hours. 8. Noise from labourers must be controlled. 9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site. 10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport. 11. Implementation of enclosure and cladding of processing plants. 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, heritage artefacts and fossils.	Heritage and Palaeontology	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/ fossils are uncovered in the affected area. 3. The Contractor must ensure that his workforce is aware of the necessity of reporting any possible historical, archaeological or palaeontological finds to the ECO so that appropriate action can be taken. 4. Known sites should be clearly marked in order that they can be avoided. The workforce should also be informed that fenced-off areas are no-go areas. 5. The ECO must also survey for heritage and palaeontological artefacts during ground breaking and digging or drilling. He/she should familiarise themselves with formations and its fossils or a palaeontologist 	Minimisation of impacts to acceptable limits

				<p>should be appointed during the digging and excavation phase of the development.</p> <p>6. All digging, excavating, drilling or blasting activities must be stopped if heritage and/or palaeontological artefacts are uncovered and a specialist should be called in to determine proper management, mitigation, excavation and/or collecting measures.</p> <p>7. Any discovered artefacts or fossils shall not be removed under any circumstances. Any destruction of a site can only be allowed once a permit is obtained and the site has been mapped and noted. Permits shall be obtained from SAHRA should the proposed site affect any world heritage/palaeontology sites or if any heritage/palaeontology sites are to be destroyed or altered.</p> <p>8. Under no circumstances shall any artefacts be removed, destroyed or interfered with by anyone on the site; and contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the NHRA (Act No. 25 of 1999), Section 51. (1).</p> <p>9. One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid 20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained.</p>	
Waste management		Pollution	Pitting and trenching phase-(construction and operation phase)	<p>Litter management</p> <p>1. Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction site.</p> <p>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.</p>	Minimisation of impacts to acceptable limits

				<ol style="list-style-type: none"> 3. Good housekeeping practices should be implemented to regularly maintain the litter and rubble situation on the construction site. 4. If possible and feasible, all waste generated on site must be separated into glass, plastic, paper, metal and wood and recycled. An independent contractor can be appointed to conduct this recycling. 5. Littering by the employees of the Contractor shall not be allowed under any circumstances. The ECO shall monitor the neatness of the work sites as well as the Contractor campsite. 6. Skip waste containers should be maintained on site. These should be kept covered and arrangements made 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. 	
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				<p>Sanitation</p> <ol style="list-style-type: none"> 16. The Contractor shall install mobile chemical toilets on the site. 17. Staff shall be sensitised to the fact that they should use these facilities at all times. No indiscriminate sanitary activities on site shall be allowed. 18. Toilets shall be serviced regularly and the ECO shall inspect toilets regularly. 19. Toilets should be no closer than 50m or above the 1:100 year flood line from any natural or manmade water bodies or drainage lines or alternatively located in a place approved of by the Engineer. 20. Under no circumstances may open areas, neighbours fences or the surrounding bush be used as a toilet facility. 21. The construction of “Long Drop” toilets is forbidden, but rather toilets connected to the sewage treatment plant. 22. Potable water must be provided for all construction staff. <p>Remedial actions</p> <ol style="list-style-type: none"> 23. Depending on the nature and extent of the spill, contaminated soil must be either excavated or treated on-site. 24. Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site. 25. The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil. 26. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material. 27. If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure. 28. Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use. 29. Contaminated remediation materials must be carefully removed from the area of the spill so as to prevent 	
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				<p>further release of petrochemicals to the environment, and stored in adequate containers until appropriate disposal.</p> <p>Tailings</p> <p>30. It is proposed that storm water cut-off trenches be dug around the excavation working areas and the proposed new tailings dam area.</p> <p>31. The proposed storm water cut-off trenches will then convey clean storm water around the excavation working areas and tailings dam.</p> <p>32. The trenches should be dug to a maximum depth of 250mm with gentle slopes. The banks as well as the bed of the trenches will be compacted with rocks packed by hand to ensure that no erosion or sedimentation are caused by the trenches.</p> <p>33. It is proposed that a storm water discharge point (“Outlet Structure”) be constructed at the base of the cut-off trenches. These discharge points will then ensure that the water conveyed by the storm water cut-off trenches are discharged gently into the natural veld without causing any erosion. Any sedimentation flowing out of these discharge structures will be trapped by the silt fences that should be installed at the base (“downstream” side) of each discharge point.</p> <p>34. The before mentioned silt should be used for rehabilitation purposes.</p> <p>35. It is proposed that silt fences (silt trap fences) be established on the “downstream” side of the excavation working areas and tailings dam. These fences will be used to trap any sedimentation and erosion that might be caused by the “dirty” water flowing over the prospecting site.</p> <p>36. The silt fences may consist of a permeable geotextile 70cm high and will be tucked into a 15cm deep anchor trench at the base. This will prevent the bottom of the fence from kicking out in a high flow situation. The fences will be supported with stakes/poles (mainly steel rods) at 1.5m centres.</p>	
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				<p>37. The silt fences will be erected in such a way that they are at a soft angle to the direction of flow. There will also be a 2nd silt fence installed in the areas where a higher</p> <p>38. It is proposed that an additional silt fence be installed at the base (“downstream” side) of the proposed new tailings dam area. This will ensure that any sedimentation resulting from the construction, maintenance or operating of the new tailings dams are trapped before it can reach any of the other areas of the prospecting site.</p> <p>39. The proposed tailings dams should have an Emergency Spill-Way Channel that will allow the upper layers of water within the dam to flow over the dam wall in a controlled manner during a severe rainfall event. Additional silt fences will therefore be installed at the base (“downstream” side) of each Emergency Spill-Way Channel. The water discharging from the Emergency Spill-Way Channel will therefore flow directly into the silt fences located at the base of the spill-way channel. These silt fences will then ensure that water can flow through the geotextile material while trapping any sedimentation within the water behind.</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. 	

				<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. 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</p>	
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				<p>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> <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> <p>Specialist mitigation</p> <p>22. Any activities that take place within 32 meters of a wetland or watercourse or the 1:100 year flood lines will require authorisation in terms of the relevant regulations of NEMA, however as far as possible infrastructure should be placed outside of wetlands and / or buffer lines.</p> <p>23. No stockpiling should take place within a watercourse or the 32m buffer.</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).

<p>ACTIVITY Whether listed or not listed.</p> <p>(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)</p>	<p>POTENTIAL IMPACT</p> <p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc....etc...)</p>	<p>MITIGATION TYPE</p> <p>(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc)</p> <p>E.g.</p> <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring <p style="text-align: center;">Remedy through rehabilitation..</p>	<p>TIME PERIOD FOR IMPLEMENTATION</p> <p>Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.</p> <p>With regard to Rehabilitation specifically this must take place at the earliest opportunity. .With regard to Rehabilitation, therefore state either:-.</p> <p>Upon cessation of the individual activity</p> <p>or.</p> <p>Upon the cessation of mining, bulk sampling or Chrome ore and Platinum Group Metals (PGM) prospecting as the case may be.</p>	<p>COMPLIANCE WITH STANDARDS</p> <p>(A description of how each of the recommendations in 2.11.6 read with 2.12 and 2.15.2 herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)</p>
<p>Clearance of vegetation</p>	<p>Loss or fragmentation of habitats</p>	<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. 5. There should be a preconstruction walk-through of the development footprint/project site in order to locate 	<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>individuals of plant species of conservation concern. A search and rescue exercise must be done to locate and relocate any protected species to a suitable and similar habitat where these plants can grow without any disturbance;</p> <p>6. 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> <p>Rehabilitation</p> <p>7. All damaged areas shall be rehabilitated upon completion of the contract.</p> <p>8. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction.</p> <p>9. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit.</p> <p>10. Rehabilitation must take place in a phased approach as soon as possible.</p> <p>11. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding.</p> <p>12. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas.</p> <p>13. 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>14. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan.</p> <p>15. The prospecting area must be well demarcated and no construction activities must be allowed outside of this demarcated footprint.</p> <p>16. Vegetation removal must be phased in order to reduce impact of construction/prospecting.</p>		
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		<p>17. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas.</p> <p>18. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas.</p> <p>19. 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>20. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p>Exotic vegetation</p> <p>21. Alien vegetation on the site will need to be controlled.</p> <p>22. The Contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>23. The spread of exotic species occurring throughout the site should be controlled.</p> <p>24. Weed control measures must be applied to eradicate any noxious weeds (category 1a & 1b species) on disturbed areas.</p> <p>Herbicides</p> <p>25. 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>26. 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>		
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		<ol style="list-style-type: none"> 27. Rehabilitation to be undertaken as soon as possible after prospecting has been completed. 28. No trapping or snaring to fauna on the construction/prospecting site should be allowed. 29. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development. 30. Any fauna threatened by the construction and operation activities should be removed to safety by the ECO or appropriately qualified environmental officer. 31. All construction vehicles should adhere to a low speed limit (<30km/h) to avoid collisions with susceptible species such as snakes and tortoises. 32. If trenches need to be dug for electrical cabling or other purposes, these should not be left open for extended periods of time as fauna may fall in and become trapped in them. Trenches which are exposed should contain soil ramps allowing fauna to escape the trench. 		
<p>Prospecting of Chrome ore and Platinum Group Metals (PGM) – excavations</p>	<p>Loss of topsoil</p>	<ol style="list-style-type: none"> 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. 2. Care must be taken not to mix topsoil and subsoil or any other material, during stripping. 3. The topsoil must be conserved on site in and around 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 or low brick walls around their bases. 6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding. 	<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>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. • 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. Implement an effective system of run-off control, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. 4. Monitor the area regularly after larger rainfall events to determine where erosion may be initiated and then mitigate by modifying the soil micro-topography and revegetation or soil erosion control efforts accordingly 	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.

		<ol style="list-style-type: none"> 5. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 6. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 7. Other erosion control measures that can be implemented are as follows: <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 8. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 9. All erosion control mechanisms need to be regularly maintained. 10. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 11. Retention of vegetation where possible to avoid soil erosion. 12. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 13. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting activities are completed. This should be done through seeding with indigenous grasses. 14. No impediment to the natural water flow other than approved erosion control works is permitted. 15. To prevent stormwater damage, the increase in stormwater 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. 16. Stockpiles not used in three (3) months after stripping must be seeded/backfilled to prevent dust and erosion. 		
	Air Pollution	Dust control <ol style="list-style-type: none"> 1. Wheel washing and damping down of un-surfaced and un-vegetated areas. 	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards,

		<ol style="list-style-type: none"> 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. <p>Fire prevention</p> <ol style="list-style-type: none"> 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. 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>thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.</p>
	Noise	<ol style="list-style-type: none"> 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. 	Duration of operation	<p>The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards,</p>

		<ol style="list-style-type: none"> 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. 3. Truck traffic should be routed away from noise sensitive areas, where possible. 4. Noise levels must be kept within acceptable limits. 5. Noisy operations should be combined so that they occur where possible at the same time. 6. Mine workers to wear necessary ear protection gear. 7. Noisy activities to take place during allocated hours. 8. Noise from labourers must be controlled. 9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site. 10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport. 11. Implementation of enclosure and cladding of processing plants. 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>thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.</p>
	<p>Impact on potential cultural, heritage artefacts and fossils.</p>	<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/ fossils are uncovered in the affected area. 3. The Contractor must ensure that his workforce is aware of the necessity of reporting any possible historical, 	<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>archaeological or palaeontological finds to the ECO so that appropriate action can be taken.</p> <ol style="list-style-type: none"> 4. Known sites should be clearly marked in order that they can be avoided. The workforce should also be informed that fenced-off areas are no-go areas. 5. The ECO must also survey for heritage and palaeontological artefacts during ground breaking and digging or drilling. He/she should familiarise themselves with formations and its fossils or a palaeontologist should be appointed during the digging and excavation phase of the development. 6. All digging, excavating, drilling or blasting activities must be stopped if heritage and/or palaeontological artefacts are uncovered and a specialist should be called in to determine proper management, mitigation, excavation and/or collecting measures. 7. Any discovered artefacts or fossils shall not be removed under any circumstances. Any destruction of a site can only be allowed once a permit is obtained and the site has been mapped and noted. Permits shall be obtained from SAHRA should the proposed site affect any world heritage/palaeontology sites or if any heritage/palaeontology sites are to be destroyed or altered. 8. Under no circumstances shall any artefacts be removed, destroyed or interfered with by anyone on the site; and contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological or palaeontological artefacts, as set out in the NHRA (Act No. 25 of 1999), Section 51. (1). 9. One historical complex (Site 1) was recorded during the survey. The site is probably associated with early to mid 20th century tobacco farming in the region. The two tobacco dry furnaces have been partially stripped of their fittings (roofs, doors and windows). One structure was constructed first (built with sun-dried bricks) and the other furnace was probably constructed later (plastered with metal support rods) and were used to cure and dry tobacco leaves. A buffer zone of 10 metres should be maintained. 		
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<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. 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. 	<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>
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		<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> <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>		
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		<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> <p>Tailings</p> <p>30. It is proposed that storm water cut-off trenches be dug around the excavation working areas and the proposed new tailings dam area.</p> <p>31. The proposed storm water cut-off trenches will then convey clean storm water around the excavation working areas and tailings dam.</p> <p>32. The trenches should be dug to a maximum depth of 250mm with gentle slopes. The banks as well as the bed of the trenches will be compacted with rocks packed by hand to ensure that no erosion or sedimentation are caused by the trenches.</p> <p>33. It is proposed that a storm water discharge point (“Outlet Structure”) be constructed at the base of the cut-off trenches. These discharge points will then ensure that the water conveyed by the storm water cut-off trenches are discharged gently into the natural veld without causing any erosion. Any sedimentation flowing out of these discharge structures will be trapped by the silt fences that should be installed at the base (“downstream” side) of each discharge point.</p> <p>34. The before mentioned silt should be used for rehabilitation purposes.</p> <p>35. It is proposed that silt fences (silt trap fences) be established on the “downstream” side of the excavation working areas and tailings dam. These fences will be used to trap any sedimentation and erosion that might</p>		
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		<p>be caused by the “dirty” water flowing over the prospecting site.</p> <p>36. The silt fences may consist of a permeable geotextile 70cm high and will be tucked into a 15cm deep anchor trench at the base. This will prevent the bottom of the fence from kicking out in a high flow situation. The fences will be supported with stakes/poles (mainly steel rods) at 1.5m centres.</p> <p>37. The silt fences will be erected in such a way that they are at a soft angle to the direction of flow. There will also be a 2nd silt fence installed in the areas where a higher</p> <p>38. It is proposed that an additional silt fence be installed at the base (“downstream” side) of the proposed new tailings dam area. This will ensure that any sedimentation resulting from the construction, maintenance or operating of the new tailings dams are trapped before it can reach any of the other areas of the prospecting site.</p> <p>39. The proposed tailings dams should have an Emergency Spill-Way Channel that will allow the upper layers of water within the dam to flow over the dam wall in a controlled manner during a severe rainfall event. Additional silt fences will therefore be installed at the base (“downstream” side) of each Emergency Spill-Way Channel. The water discharging from the Emergency Spill-Way Channel will therefore flow directly into the silt fences located at the base of the spill-way channel. These silt fences will then ensure that water can flow through the geotextile material while trapping any sedimentation within the water behind.</p>		
Water Use and Quality	Water pollution	<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 		

		<p>managed and treated to meet applicable effluent discharge guidelines.</p> <ol style="list-style-type: none"> 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. 9. Promote a water saving mind set with construction/prospecting workers in order to Contractor ensure less water wastage. 10. New stormwater construction must be developed strictly according to specifications from engineers in order to ensure efficiency. 11. Hazardous substances must be stored at least 20m from any water bodies on site to avoid pollution. 12. The installation of the stormwater system must take place as soon as possible to attenuate stormwater from the construction phase as well as the operation phase. 13. Earth, stone and rubble is to be properly disposed of, or utilized on site so as not to obstruct natural water path ways over the site. i.e. these materials must not be placed in stormwater channels, drainage lines or rivers. 14. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed. 15. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant 		
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		<p>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 untreated 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> <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> <p>Specialist mitigation</p> <p>23. Any activities that take place within 32 meters of a wetland or watercourse or the 1:100 year flood lines will require authorisation in terms of the relevant regulations of NEMA, however as far as possible infrastructure</p>		
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		should be placed outside of wetlands and / or buffer lines. 24. No stockpiling should take place within a watercourse or the 32m buffer.		
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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 Chrome ore and Platinum Group Metals (PGM) – excavations	Loss of topsoil Erosion Air Pollution Noise Impact on potential cultural-, heritage artefacts and fossils	<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.

Milnex 189 CC: EIA265 – EIR & EMP: Full EIA for the Section 102, Part 2 amendment to amend the existing Prospecting Right (NW 30/5/1/1/2/11794 PR) to include bulk sampling to prospect for Chrome ore and Platinum Group Metals (PGM), combined with a Waste License application near Madibeng on the Remaining Extent of Portion 1, Portion 2, Portion 3 (portion of portion 1) of the farm Lekker Sukkel Landgoed 454, the farm Zandfontein 923 and Portion 44 (portion of portion 5), Portion 45 (portion of portion 5), Remaining Extent of Portion 46 (portion of portion 5), Remaining Extent of Portion 226, Portion 343 (portion of portion 41), Portion 369, Portion 370, Portion 371 and Portion 372 of the farm Zandfontein 447, Registration Division: JQ, North West Province.

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.
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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.**

Thabo-Gaelebele Mineral Resources (Pty) Ltd will implement an Environmental Awareness Plan which will include various mechanisms for informing employees of environmental risks resulting from their work, including:

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

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

See the attached **Appendix 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.**

Thabo-Gaelebele Mineral Resources (Pty) Ltd will implement an incident reporting and reporting procedure in order to identify risks timeously and implement actions to avoid or minimise environmental impacts.

**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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