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AMENDED ENVIRONMENTAL IMPACT ASSESSMENT REPORT & ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT FOR:

THE PROSPECTING RIGHT APPLICATION COMBINED WITH A WASTE LICENCE APPLICATION TO PROSPECT FOR DIAMOND (ALLUVIAL), DIAMOND (GENERAL), DIAMONDS AND DIAMONDS (KIMBERLITE) NEAR UPINGTON ON PORTION 7 OF THE FARM ADEISESTAD 409, PORTION 1 OF THE FARM KALKPUNT 407, REMAINING EXTENT OF PORTION 21 AND PORTION 29 (PORTION OF PORTION 21) OF THE FARM UAP 418 & ON FARM 596, REGISTRATION DIVISION: GORDONIA, NORTHERN CAPE PROVINCE.

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PROJECT INFORMATION


Project Name: Application for an Environmental Authorisation for The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

Report Title: Amended EIR & EMPr

Prepared By: Milnex CC Environmental Consultants

Date: June 2022

QUALITY CONTROL:

	Report Author:	Report Reviewer:
Name:	Christiaan Baron	N/A
Signature:		

DISCLAIMER:

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IMPORTANT NOTICE

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

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

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

OBJECTIVE OF THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

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

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

SCOPE OF ASSESSMENT AND CONTENT OF ENVIRONMENTAL IMPACT ASSESSMENT REPORTS

A. 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
Mr. Christiaan Baron	Master's Degree in Environmental Management (M.ENV.MAN) (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: christiaan@milnex-sa.co.za
Ms. Percy Sehaole Pr. Sci. Nat. EAPASA (2019/959)	Master's Degree in Environmental Science Master's Degree in Environmental Management (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: percy@milnex-sa.co.za
Ms. 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

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

Milnex CC was contracted by **Mopane Tree SA (Pty) Ltd** as the independent environmental consultant to undertake the Scoping and EIA process for the proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province. The property is located approximately 49km East of Upington adjacent the N14 in the Northern Cape Province. Milnex CC does not have any interest in secondary developments that may arise out of the authorisation of the proposed project.

Milnex 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 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 CC team has considerable experience in environmental impact assessment and environmental management, especially in the mining industry.

Christiaan Baron, Percy Sehaole & Lizanne Esterhuizen 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:	<p>1) Portion 7 of the farm Adeisestad 409 Title deed: T581/2014 Registration division: Gordonia RD Province: Northern Cape</p> <p>2) Portion 1 of the farm Kalkpunt 407 Title Deed: T658/2013 Registration Division: Gordonia Rd Province: Northern Cape</p> <p>3) Remaining extent of portion 21 of the farm UAP 418 Title Deed: T726/2014 Registration Division: Gordonia Rd Province: Northern Cape</p> <p>4) Portion 29 (portion of portion 21) of the farm UAP 418 Title Deed: T462/1990 Registration Division: Gordonia Rd Province: Northern Cape</p> <p>5) Farm 596 Title Deed: T581/2014 Registration Division: Gordonia Rd Province: Northern Cape</p>
Application area (Ha)	810.485 ha
Magisterial district:	Siyanda District Municipality
Local Municipality	Khara Hais Local Municipality
Registration Division	Gordonia
Distance and direction from nearest town	The property is located approximately 49km East of Upington adjacent the N14 in the Northern Cape Province.
21 digit Surveyor General Code for each farm portion	<p>C02800000000059600000</p> <p>C02800000000040900007</p> <p>C02800000000040700001</p> <p>C02800000000041800000</p> <p>C02800000000041800029</p>
Minerals Applied for	<p>DIAMONDS ALLUVIAL</p> <p>DIAMONDS GENERAL</p> <p>DIAMONDS IN KIMBERLITE</p> <p>DIAMONDS</p>

iii. Farm co-ordinates

Farms	Longitude	Latitude
1. Portion 7 of the farm Adeisestad 409	21° 24' 25.429" E	28° 23' 24.433" S
	21° 24' 22.995" E	28° 23' 24.472" S
2. Portion 1 of the farm Kalkpunt 407	21° 24' 13.277" E	28° 23' 24.396" S
	21° 24' 2.805" E	28° 23' 21.843" S
3. Remaining Extent of portion 21 of the farm UAP 418	21° 23' 53.616" E	28° 23' 17.977" S
	21° 23' 48.130" E	28° 23' 8.614" S
4. Portion 29 (portion of portion 21) of the farm UAP 418	21° 23' 47.565" E	28° 23' 7.481" S

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5. Farm 596	21° 23' 47.240" E	28° 23' 6.930" S
	21° 23' 46.862" E	28° 23' 6.412" S
	21° 23' 46.447" E	28° 23' 5.909" S
	21° 23' 46.025" E	28° 23' 5.412" S
	21° 23' 45.519" E	28° 23' 4.976" S
	21° 23' 45.007" E	28° 23' 4.574" S
	21° 23' 44.449" E	28° 23' 4.190" S
	21° 23' 43.869" E	28° 23' 3.844" S
	21° 23' 42.619" E	28° 23' 3.293" S
	21° 23' 41.319" E	28° 23' 2.874" S
	21° 23' 39.937" E	28° 23' 2.632" S
	21° 23' 38.462" E	28° 23' 0.872" S
	21° 23' 35.002" E	28° 23' 1.903" S
	21° 23' 32.397" E	28° 23' 3.032" S
	21° 23' 32.494" E	28° 23' 4.702" S
	21° 23' 31.970" E	28° 23' 5.115" S
	21° 23' 31.044" E	28° 23' 6.077" S
	21° 23' 30.318" E	28° 23' 7.084" S
	21° 23' 29.705" E	28° 23' 8.209" S
	21° 23' 29.344" E	28° 23' 9.401" S
	21° 23' 29.154" E	28° 23' 10.621" S
	21° 23' 29.137" E	28° 23' 11.855" S
	21° 23' 29.238" E	28° 23' 12.473" S
	21° 23' 29.523" E	28° 23' 13.649" S
	21° 23' 30.032" E	28° 23' 14.850" S
	21° 23' 30.709" E	28° 23' 15.896" S
	21° 23' 28.864" E	28° 23' 16.575" S
	21° 23' 25.000" E	28° 23' 16.828" S
	21° 23' 24.732" E	28° 23' 19.433" S
	21° 23' 29.039" E	28° 23' 19.280" S
	21° 23' 29.311" E	28° 23' 24.469" S
	21° 23' 24.211" E	28° 23' 24.867" S
	21° 23' 16.616" E	28° 23' 25.904" S
	21° 23' 15.936" E	28° 23' 28.558" S
	21° 23' 22.488" E	28° 23' 30.720" S
	21° 23' 20.291" E	28° 23' 38.926" S
	21° 23' 21.916" E	28° 23' 41.165" S
	21° 23' 25.975" E	28° 23' 46.209" S
	21° 23' 32.805" E	28° 23' 54.083" S
	21° 23' 34.000" E	28° 23' 57.509" S
21° 23' 35.195" E	28° 24' 0.693" S	
21° 23' 36.673" E	28° 24' 11.747" S	
21° 23' 36.741" E	28° 24' 21.982" S	
21° 23' 35.501" E	28° 24' 25.703" S	
21° 23' 34.021" E	28° 24' 30.209" S	
21° 23' 38.371" E	28° 24' 40.004" S	
21° 23' 46.465" E	28° 24' 38.451" S	
21° 23' 48.530" E	28° 24' 38.813" S	
21° 23' 49.803" E	28° 24' 50.934" S	
21° 23' 53.599" E	28° 24' 58.286" S	

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	21° 23' 52.468" E	28° 25' 24.248" S
	21° 23' 52.942" E	28° 25' 24.301" S
	21° 24' 3.786" E	28° 25' 25.527" S
	21° 24' 5.464" E	28° 25' 5.156" S
	21° 34' 28.051" E	28° 22' 38.953" S
	21° 34' 8.679" E	28° 23' 32.586" S
	21° 34' 21.023" E	28° 23' 37.412" S
	21° 34' 30.904" E	28° 23' 21.918" S
	21° 34' 32.610" E	28° 23' 19.552" S
	21° 34' 36.087" E	28° 23' 13.725" S
	21° 34' 47.509" E	28° 23' 10.613" S
	21° 34' 49.997" E	28° 23' 7.496" S
	21° 34' 53.064" E	28° 23' 3.363" S
	21° 34' 54.078" E	28° 22' 59.964" S
	21° 34' 54.313" E	28° 22' 56.167" S
	21° 34' 53.538" E	28° 22' 53.890" S
	21° 34' 51.915" E	28° 22' 51.181" S
	21° 34' 50.725" E	28° 22' 48.880" S
	21° 34' 48.671" E	28° 22' 46.482" S
	21° 34' 46.549" E	28° 22' 45.054" S
	21° 34' 44.504" E	28° 22' 41.053" S
	21° 34' 33.153" E	28° 22' 41.039" S
	21° 38' 19.356" E	28° 23' 44.700" S
	21° 38' 40.884" E	28° 23' 54.456" S
	21° 38' 47.904" E	28° 24' 15.012" S
	21° 38' 33.225" E	28° 25' 25.435" S
	21° 38' 23.965" E	28° 25' 17.655" S
	21° 38' 19.771" E	28° 25' 14.616" S
	21° 38' 15.505" E	28° 25' 11.524" S
	21° 38' 11.224" E	28° 25' 8.655" S
	21° 38' 7.411" E	28° 25' 6.355" S
	21° 38' 2.266" E	28° 25' 2.989" S
	21° 37' 57.979" E	28° 24' 59.871" S
	21° 37' 54.159" E	28° 24' 57.139" S
	21° 34' 37.432" E	28° 22' 27.215" S
	21° 34' 9.326" E	28° 22' 38.300" S
	21° 34' 13.143" E	28° 22' 54.301" S
	21° 34' 6.889" E	28° 23' 12.474" S
	21° 34' 16.239" E	28° 23' 11.660" 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.

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

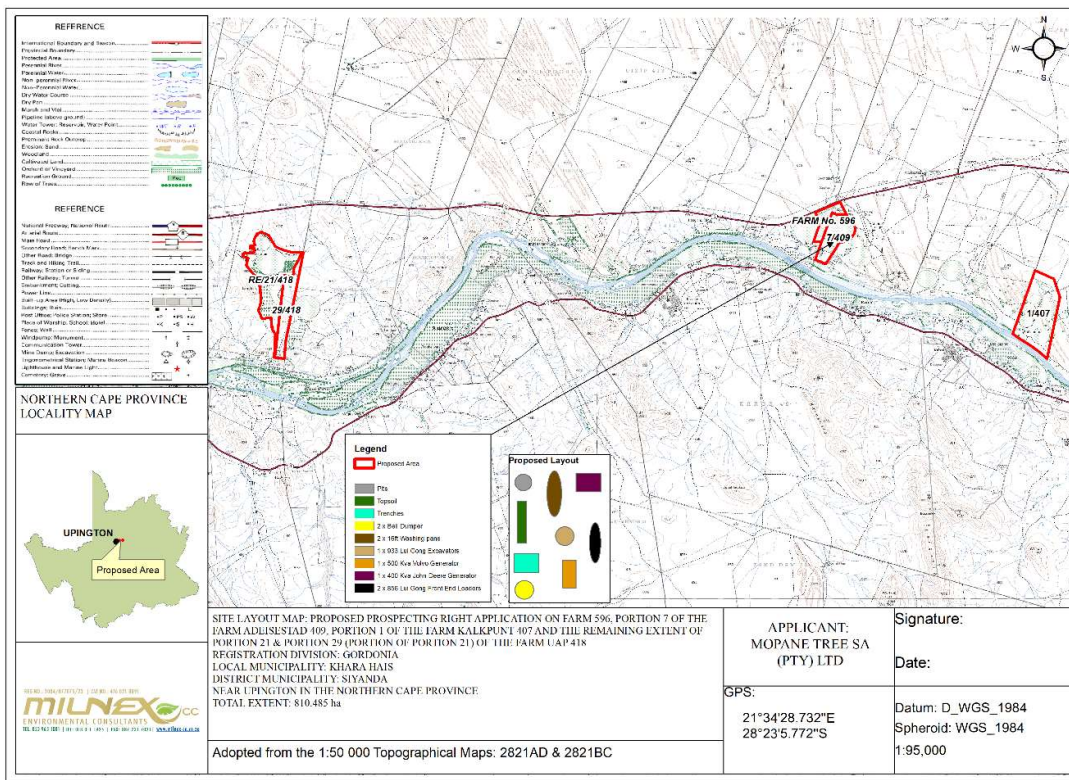


Figure 2: Site Plan

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

i) LISTED AND SPECIFIED ACTIVITIES

<p>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)</p>	<ol style="list-style-type: none"> 1) Listing notice 1 GNR327: Activity 9: “The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water— (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more;” 2) Listing notice 1 GNR 327: Activity 10: “The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes – (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more;” 3) Listing Notice 1: GNR 327, Activity 19: The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from: (i) a watercourse; 4) Listing Notice 1, GNR 327, 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— (a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource; or [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)] (b) the primary processing of a petroleum resource including winning, extraction, classifying, concentrating or water removal;
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	<p>5) Listing Notice 1, GNR 327, Activity 24: <i>“The development of a road – with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres”</i></p> <p>6) Listing Notice 1, GNR 327, Activity 27: <i>“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation.”</i></p> <p>7) Listing Notice 2, GNR 325, Activity 19: <i>“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;</i></p> <p>8) Listing Notice 3, GNR 324, Activity 4 (g)(ii) (ee): <i>“The development of a road wider than 4 metres with a reserve less than 13.5 metres (g) Northern Cape (ii) Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or is bioregional plans</i></p> <p>9) Listing Notice 3 GNR 324, Activity 12(g) (ii): <i>The clearance of an area of 300 square metres or more of indigenous vegetation (g) Northern Cape (ii) Within critical biodiversity areas identified in bioregional plans</i></p> <p>NEM:WA 59 of 2008:</p> <p>10) Residue stockpiles or residue deposits, Category A: (15) <i>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).</i></p> <p>Prospecting right with bulk samples for the prospecting of Diamonds (Alluvial, General & in Kimberlite) including associated infrastructure, structure and earthworks.</p>
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NAME OF ACTIVITY (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	Aerial extent of the Activity Ha or m²	LISTED ACTIVITY (Mark with an X where applicable or affected).	APPLICABLE LISTING NOTICE (GNR 324, GNR 325 or GNR 326)	WASTE MANAGEMENT AUTHORISATION (Indicate whether an authorisation is required in terms of the Waste Management Act) (Mark with an X)
Bulk transportation of water or storm water: BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m). Listing notice 1, GNR327: Activity 9: The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water— (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more	Extent of the proposed portions are 810.485Ha Concurrent backfilling will take place in order to rehabilitate.	X	Listing Notice 1: GNR 327, Activity 9	
Bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes: BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m). Listing notice 1, GNR 327: Activity 10: The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes – (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more;	Extent of the proposed portions are 810.485Ha Concurrent backfilling will take place in order to rehabilitate.	X	Listing Notice 1: GNR 327, Activity 10	
Prospecting Right: BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m). Listing Notice 1: GNR 327, Activity 19: <i>The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from:</i> i) a watercourse;	Extent of the proposed portions are 810.485Ha Concurrent backfilling will take place in order to rehabilitate.	X	Listing Notice 1: GNR 327, Activity 19	-

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<p>Prospecting Right:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p> <p>Bulk sample of 120 000 tons</p> <p>Listing Notice 1, GNR 327, Activity 20: <i>“Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including—</i> <i>(a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource; or [including activities for which an exemption has been issued in terms of section 106 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)]</i> <i>(b) the primary processing of a petroleum resource including winning, extraction, classifying, concentrating or water removal</i></p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 1, GNR 327, Activity 20</p>	<p>-</p>
<p>Clearance of indigenous vegetation:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p> <p>Listing Notice 1, GNR 327, Activity 24: <i>“The development of a road – with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres”</i></p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 1, GNR,327, Activity 24</p>	<p>-</p>
<p>Clearance of indigenous vegetation:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p> <p>Listing Notice 1, GNR 327, Activity 27:<i>“The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation.”</i></p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 1, GNR 327, Activity 27</p>	<p>-</p>

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<p>Prospecting:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p> <p>Listing Notice 2 GNR 325, Activity 19: <i>“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—</i> <i>(a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource [,]; or</i> <i>(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</i></p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 2, GNR 325, Activity 19:</p>	<p>-</p>
<p>Clearance of indigenous vegetation:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p> <p>Listing Notice 3, GNR 324, Activity 4 (g)(ii) (ee): <i>“The development of a road wider than 4 metres with a reserve less than 13.5 metres (g) Northern Cape (ii) Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or is bioregional plans</i></p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 3 GNR 324, Activity 4g (ii) (ee)</p>	<p>-</p>
<p>Clearance of indigenous vegetation:</p> <p>BULK SAMPLING: 810.485Ha - 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).</p>	<p>Extent of the proposed portions are 810.485Ha</p> <p>Concurrent backfilling will take place in order to rehabilitate.</p>	<p>X</p>	<p>Listing Notice 3 GNR 324, Activity 12g (ii)</p>	<p>-</p>

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<p>Listing Notice 3 GNR 324, Activity 12(g) (ii): <i>The clearance of an area of 300 square metres or more of indigenous vegetation (g) Northern Cape (ii) Within critical biodiversity areas identified in bioregional plans</i></p>				
<p>NEM:WA 59 of 2008: Residue stockpiles or residue deposits, Category A: (15): <i>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).</i></p>			<p>NEM:WA 59 of 2008 Category A: (15)</p>	-

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)

Mopane Tree SA (Pty Ltd) has embarked on a process for applying for a Prospecting Right combined with a Waste Licence to prospect for Diamonds (Alluvial, General & in Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province (refer to a locality map attached in **Appendix 3**).

A DESCRIPTION OF HOW THE MINERAL RESOURCE AND MINERAL DISTRIBUTION OF THE PROSPECTING AREA WILL BE DETERMINED

Phase 1 – Site Visits

The applicant will appoint Pierre de Jager as the project geologist to conduct the site visit. A formal site visit will be done within 90 days after the prospecting right has been executed. It is foreseen that more than one site visit will be conducted on the farms.

The purpose of the site visit is to assist the applicant to be familiar with the environment and with the assessment of the topography and the general geology before invasive prospecting activities. During this process the applicant will also review all documentation that has been received in relation to the geology of the area.

Phase 2 – Desktop Studies

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

This phase involves reviewing the literature surveys, interpretation of aerial photographs, satellite images and ground validation of targets. A preliminary analysis of the environment will be obtained which will improve the project's efficiency and cost by providing a clearer understanding of the challenges may be encountered. Compilation of the results of analysis will be done by the geologist after the finalization of the desktop studies.

Phase 3 – Pitting

A trial pit / test pit or inspection pit investigation is a highly effective way of obtaining data on the sub surface soil and rock conditions which underlie a prospecting right. It allows for the various soils and rock types to be locked, the soil to be sampled and a preliminary assessment to be made.

Pits will be dug, locked, sampled and backfilled. To dig the pits the applicant will make use of the systems of Pierre de Jager, the appointed project geologist.

The applicant will at the end of the pitting process have locked the pits with the following information:

- A description of the soil and rock types from ground level to the base of the pits;
- Record of rock head depth and refusal depth, a list of where the samples will be taken, a record of where ground water seepage will be recorded;
- A general note of the geology and conditions in the vicinity of the test pits
- Pitting will be done within the period of 24 months once the prospecting right has been granted.

Calculations

It is planned that 100 pits will be dug (it may be less depending on the results) at an extent of 3m (length) x 3m (breadth) x 4m (depth).

- 100 pits / 2years = 50 pits dug per year
- Total area to be disturbed per year = 50 pits x (3m x 3m) / 10 000 = 0.045Ha disturbed per year
- Total area disturbed for 24 months = 100 pits x (3m x 3m) / 10 000 = 0.09 Ha disturbed

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Phase 4 – Trenches

Due to nature of the alluvial diamond deposit, samples are not taken for assay as would be normal practice to evaluate hard rock precious or base-metal prospects. The diamond distribution pattern grade of alluvial diamonds is also of such a nature that there is no repeatability of sample results, even from adjacent samples.

Bulk samples will have to be taken to determine the average sample grade. By taking of the bulk samples, the applicant foresees to determine the grade of the diamond deposits as the number of carats contained in 100 tons (cpht) of gravel and to determine the average diamond sizes.

During these activities the applicant will then find out the size and value distribution of trenches. Diamond distribution patterns of alluvial deposits varies to such a nature that there is no repeatability of sample results even from adjacent samples.

Alluvial diamond deposits can only be sampled through bulk sampling comprising thousands of cubic meters of gravel. Given the extent of the area and the grades expected to be very low, the applicant will have to process bulk samples of approximately 120 000 tonnes.

The appointed geologist will advise where the samples will be taken. Bulk samples will not be taken along a systematic grid as in the case of drilling.

As the anticipated mining plan for the properties will be based on high volumes (low grades), the bulk samples will have to address average recovery.

As indicated, the bulk sampling exercise has to be conducted to determine the grades (cpht), the diamond size distribution and thereafter to sell the diamonds to determine the diamond values.

The plant/ bulk sampling technique will be that of a typical South African alluvial diamond mining operation. The method is a strip mining process with oversize material and tailings recovered from the plant will be used as backfill material prior to final rehabilitation. Gravels are excavated, loaded and transported to the treatment facility using dump trucks.

The bulk sampling operation will be conducted using a fleet of conventional open pit mining equipment comprising of dump trucks supported by appropriate excavators and front-end loaders. All equipment is planned to be diesel driven.

Before excavation commences vegetation will be cleared from the proposed bulk sampling block. These will be done as per environmental regulations. Topsoil will then be removed and stored separately for later used for rehabilitation.

The bulk samples will be made in the form of box cuts the dimensions of these individual box cuts will on average be 40m long x 30m wide.

It is estimated that the bulk samples will be 5 m in depth.

Gravel will be removed by excavators and will be loaded directly into dump trucks. Ore will be hauled to the screening plant. The material will be screened where after the screened material will be moved to the processing plant where the gravel will be processed. Concentrate will be moved to the sorting plant where the concentrate will be sorted

Calculations

It is planned that 25 trenches will be dug at an extent of 40m (length) x 30m (breadth) x 5m (depth).

- 25 trenches / 2 years = 12.5 trenches dug per year
- Total area to be disturbed per year = 12.5 trenches x (40m x 30m) / 10 000 = 1.5 Ha disturbed per year.
- Total area disturbed for 48 months = 25 trenches x (40m x 30m) / 10 000 = 3 Ha disturbed

Phase 5 – Consolidation and Interpretation of Results Data

The prospecting activities will be conducted to determine an inferred diamond resource and an indicated diamond resource. An inferred diamond resource has a lower level of confidence than that applying to an indicated diamond resource. The inferred

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resource indication will be where the geological and or grade continuity could not be confidently interpreted. It cannot be assumed that an inferred resource will necessarily be upgraded to an indicated resource. Such a resource is normally also not sufficient to enable an evaluation of economic viability.

To obtain an indicated resource the confidence level of information obtained from the prospecting will have to be sufficient for the information to be applied to mine design, mine planning to enable an evaluation of economic viability.

The project geologist, Pierre de Jager, will monitor the program and consolidate and process the data and amend the program depending on the results received after each phase of prospecting. The DMR will be updated of any amendments made. This will be a continuous process throughout the prospecting work program.

Each physical phase of prospecting will be followed by desktop studies involving interpretation and modeling of all data gathered. These studies will determine the manner in which the work programme is to be proceeded with in terms of the activity, quantity, resources, expenditure and duration.

A GIS data base will be constructed capturing all the exploration data. All data will be consolidated and processed to determine the diamond bearing resource on the property.

Prospecting activities and phases

Please find the Prospecting Work Programme attached as **Appendix 9**.

Water Supply

Water uses under section 21 a-k of the NWA may be triggered, thus a Water Use Licence Application (WULA) will needed in cases there will be encroachment. When needed a WULA will be lodged with the department of Water & Sanitation (DWS).

Table 1: Water Use Pan Size specifications for Alluvial Diamond Mining (DWS NC & FS, 2001).

Pan size	Water/hour (m ³)	Water/day(m ³)	Gravel/hour (tons)	Gravel/day (ton)
16	17	170	60	600

Since 2 x 16 feet washing pans will be used, the amount of water for the pans will be 34 000 L/hour from which 30% is re-used.

Dust suppression

It was the intention of the applicant to implement dust management on site to determine if unacceptable levels of dust fallout occur. Monitoring compliance with the requirements of the National Dust Control Regulations for an activity, in terms of nuisance or disturbance.

The National Framework for Air Quality Management in the Republic of South Africa (the National Framework), as published under Government Notice No. 1144 of 26 October 2018, underpins NEM:AQA by providing national norms and standards for air quality management to ensure compliance with legislation. The National Framework serves as the country's AQMP.

Section 32 of the NEM:AQA makes provision for the Minister or the MEC to prescribe measures for the control of dust in specific places or areas, or by specified machinery or in specific instances. While dust generally does not pose a health risk, it may be regarded as a nuisance. It is the responsibility of the owner of the dust generating activity to take reasonable measures to limit the nuisance factor.

With respect to this, the Minister has published in the gazette the regulations for the control of dust in 2013 (Notice 827, Government Gazette No. 36974). These regulations provide requirements for measures for the control of dust, which includes the requirements for monitoring, dust management plan development and implementation and reporting.

According to dust levels set out by the National Dust Control Regulations 2013 (GNR. 827). The limits have the following threshold Section 3. Dustfall standard.

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Table 1. Acceptable dust fall rates

Restriction Areas	Dustfall rate (D) (mg/m²/day, 30-day average)	Permitted frequency of exceeding dust fall rate
Residential Area	$D < 600$	Two within a year, not sequential months
Non-residential Area	$600 < D < 1200$	Two within a year, not sequential months

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 if any will be stored on site. These goods should be placed in a bunded area one and a half times the volume of the total amount of goods to be stored.

List of equipment's & infrastructure

List of equipment
1 x 400 Kva John Deere Generator
1 x 500 Kva Volvo Generator
1 x 933 Lui Gong Excavators
2 x 856 Lui Gong Front End Loaders
2 x 16ft Washing pans
2 x Bell Dumper

E. POLICY AND LEGISLATIVE CONTEXT

(a description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;)

Title of legislation, policy or guideline:	Administering authority:	Promulgation Date:
National Environmental Management Act No. 107 of 1998 as amended.	Department of Environmental Affairs	27 November 1998
Constitution of South Africa Act 108 of 1996	National	18 December 1996
The National Heritage Resources Act (Act No. 25 of 1999)	SAHRA	1999
Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	Department of Mineral Resources & Energy (DMRE)	2002
National Infrastructure Plan	National	
National Environmental Management: Biodiversity Act No. 10 of 2004	Department of Environmental Affairs	7 June 2004
National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)	National & Provincial	1 July 2009
EIA regulations under NEMA	Department of Environmental Affairs	14 December 2014
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)	Department of Agriculture Forestry and Fisheries	1 June 1984

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National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004).	National and Provincial	11 September 2004
National Water Act, 1998 (Act No. 36 of 1998).	National	20 August 1998
Northern Cape Province Growth and Development Strategy	Provincial	11 August 2013
Siyanda District Municipality Integrated Development Plan (IDP)	Municipal	Term 2017 - 2022
Khara Hais Local Municipality Integrated Development Plan (IDP)	Municipal	Term 2016/2017
National Forest Act (Act 84 of 1998) (NFA)	National	30 October 1998
National Veld & Forest Fires Act (Act 101 of 1998)	National	27 November 1998

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Policy and Legislative Context

Title of legislation, policy or guideline:	Reference where applied	How does this development comply with and respond to the legislation and policy context.
Constitution of South Africa Act 108 of 1996	Section 24	<p>The Constitution is the supreme law of the Republic and all law and conduct must be consistent with the Constitution. The Chapter on the Bill of Rights contains a number of provisions, which are relevant to securing the protection of the environment. Section 24 of the Constitution of the Republic of South Africa (Act 108 of 1996) states the following:</p> <p><i>“Everyone has the right –</i> <i>(a) to an environment that is not harmful to their health or well-being; and</i> <i>(b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that –</i> <i>i) prevent pollution and ecological degradation;</i> <i>ii) promote conservation; and</i> <i>iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.”</i></p> <p>The Constitution therefore, compels government to give effect to the people’s environmental right and places government under a legal duty to act as a responsible custodian of the countries environment. It compels government to pass legislation and use other measures to protect the environment, to prevent pollution and ecological degradation, promote conservation and secure sustainable development.</p>
National Environmental Management Act No. 107 of 1998 as amended.	S24(1) of NEMA S28(1) of NEMA	<p>NEMA provides for co-operative governance by establishing principles and procedures for decision-makers on matters affecting the environment. An important function of the Act is to serve as an enabling Act for the promulgation of legislation to effectively address integrated environmental management. Some of the principles in the Act are accountability; affordability; cradle to grave management; equity; integration; open information; polluter pays; subsidiary; waste avoidance and minimisation; co-operative governance; sustainable development; and environmental protection and justice.</p> <p>The mandate for EIA lays with the National Environmental Management Act (107 of 1998) and the EIA Regulations No. 326, 327, 325, and 324 promulgated in terms of Section 24 of NEMA. The EIA Regulations determine that an Environmental Authorisation is required for certain listed activities, which might have a detrimental effect on the environment.</p>
EIA regulations as amended under NEMA	Listing notice 1 Listing notice 2 Listing Notice 3	<p>The National Environmental Management Act 107 of 1998 (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment. These activities are detailed in Listing Notice 1 (as amended by GNR 327 of 7 April 2017), Listing Notice 2 (as amended by GNR325 of 7 April 2017) and Listing Notice 3 (as amended by GNR324 of 7 April 2017). Undertaking activities specified in the Listing Notices are only allowed once Environmental Authorisation has been obtained from the competent authority. Such Environmental Authorisation will only be considered once there has been compliance with the EIA Regulations, 2014. The Environmental Authorisation which may be granted subject to conditions.</p>

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Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	Section 10, 16, 22, 27 and 48	The Minerals and Petroleum Resources Development Act identifies the state as the official custodian of South Africa's Mineral and Petroleum Resources. Therefore, all activities relating to the reconnaissance, prospecting rights, mining rights, mining permits and retention permits are regulated by the State. One of the objectives of the Act is to give effect to section 24 of the Constitution by ensuring that the nation's mineral and petroleum resources are developed in an orderly and ecologically sustainable manner while promoting justifiable social and economic development.
Mineral and Petroleum Resources Development Regulations, 2014.	Regulations 3, 5, 10 and 14	MPRDA Regulations prescribe how an application for a permit or right must be lodged.
The National Heritage Resources Act (Act No. 25 of 1999)	Section 35 Section 38	The National Heritage Resources Act (Act No 25 of 1999, Section 35) protects South Africa's unique and non-renewable archaeological and palaeontological heritage sites. These sites may not be disturbed without a permit from the relevant heritage resources authority. Section 38 of the NHRA provides guidelines for Cultural Resources Management and proposed developments:
National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)	Category A Category B Category C	<p>Section 24S of NEMA deals with the management of residue stockpiles and residue deposits and provides that Residue stockpiles and residue deposits must be deposited and managed in accordance with the provisions of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), on any site demarcated for that purpose in the environmental management plan or environmental management programme in question.</p> <p>The management of residue stockpiles and residue deposits must be done in accordance with any conditions set out and any identified measures in the environmental authorisation issued in terms of NEMA, an environmental management programme and a waste management licence issued in terms of NEMA (Regulation 3(2)).</p> <p>The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM:WA) regulates waste management in all aspects and created a list of waste management activities that have, or are likely to have, a detrimental effect on the environment, which requires an impact assessment and licensing process. Activities listed in Category A require a Basic Assessment process, activities listed in Category B require a Scoping and EIA process and activities under Category C must comply with the relevant requirements or standards, in order for competent authorities to consider an application in terms of NEM:WA.</p>

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<p>National Environmental Management: Biodiversity Act No. 10 of 2004</p>	<p>Chapter 4 Chapter 5</p>	<p>The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) is part of a suite of legislation falling under NEMA. The 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 protection; 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 (SANBI).</p> <p>Chapter 4 of NEMBA deals with threatened and protected ecosystems and species to ensure the maintenance of their ecological integrity, their survival in the wild, the utilisation of biodiversity is managed in an ecologically sustainable way and to regulate international trade in specimens of endangered species. Chapter 5 of NEMA deals with species and organisms posing potential threats to biodiversity. The purpose of this chapter is to prevent the introduction and spread of alien species and invasive species, also to manage, control and eradicate alien species and invasive species</p>
<p>National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004).</p>	<p>Section 21</p>	<p>The object of this Act is to protect the environment by providing reasonable measures for the protection and enhancement of the quality of air in the Republic; the prevention of air pollution and ecological degradation; and securing ecologically sustainable development while promoting justifiable economic and social development.</p> <p>Regulations No. R248 (of 31 March 2010) promulgated in terms of Section 21(1) (a) of the National Environmental Management Act: Air Quality Act (39 of 2004) determine that an Atmospheric Emission License (AEL) is required for certain listed activities, which result in atmospheric emissions which have or may have a detrimental effect on the environment. The Regulation also sets out the minimum emission standards for the listed activities. It is not envisaged that an Atmospheric Emission License will be required for the proposed development.</p>
<p>National Water Act, 1998 (Act No. 36 of 1998).</p>	<p>Section 21</p>	<p>Sustainability and equity are identified as central guiding principles in the protection, use, development, conservation, management and control of water resources. The intention of the Act is to promote the equitable access to water and the sustainable use of water, redress past racial and gender discrimination, and facilitate economic and social development. The Act provides the rights of access to basic water supply and sanitation, and environmentally, it provides for the protection of aquatic and associated ecosystems, the reduction and prevention of pollution and degradation of water resources.</p> <p>As this Act is founded on the principle that National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest, a person can only be entitled to use water if the use is permissible under the Act. Chapter 4 of the Act lays the basis for regulating water use.</p>

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National Forest Act (Act 84 of 1998) (NFA)	Regulation 7	<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>Regulation 7 from the Act states the following:</p> <p>Prohibition on destruction of trees in natural forests.</p> <p>(1) No person may -</p> <p>(a) cut, disturb, damage or destroy any indigenous tree in a natural forest; or</p> <p>(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-</p> <p>(i) a licence issued under subsection (4) or section 23; or</p> <p>(ii) an exemption from the provisions of this subsection published by the Minister in the Gazette on the advice of the Council.</p>
National Veld & Forest Fires Act (Act 101 of 1998)	Regulation 13 Chapter 5	<p>The purpose of the Act is to prevent and combat veld, forest and mountain fires throughout the Republic and provides for a variety of institutions, methods and practices for achieving the purpose. Regulations 13 provides the requirement for firebreaks. Chapter 5 places a duty on all owners to acquire equipment and have available personnel to fight fires.</p>
Conservation of Agricultural Resources Act (Act No. 85 of 1983)		<p>The purpose of the Act is to provide for control over the utilization of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invader plants; and for matters connected therewith.</p> <p>The objects of this Act are to provide for the conservation of the natural agricultural resources of the Republic by the maintenance of the production potential of land, by the combating and prevention of erosion and weakening or destruction of the water sources, and by the protection of the vegetation and the combating of weeds and invader plants.</p>
National Infrastructure Plan		<p>The National Government adopted a National Infrastructure Plan in 2012. With the plan they aim to transform the South African economic landscape while simultaneously creating significant numbers of new jobs, and strengthening the delivery of basic services.</p> <p>Government will over the three years from 2013/14 invest R827 billion in building and upgrading existing infrastructure.</p> <p>These investments will improve access by South Africans to healthcare facilities, schools, water, sanitation, housing and electrification. On the other hand, investments in the construction of ports, roads, railway systems, electricity plants, hospitals, schools and dams will contribute to faster economic growth.</p>

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District Municipality Integrated Development Plan (IDP)		The IDP and SDFs of the relevant municipalities was examined and relevant information has been included in the EIA report.
Local Municipality Integrated Development Plan (IDP)		The IDP and SDFs of the relevant municipalities was examined and relevant information has been included in the EIA report.

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F. NEED AND DESIRABILITY OF THE PROPOSED ACTIVITIES.

(a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred [location] development footprint within the approved site as contemplated in the accepted scoping report;).

Economic activity in modern-day South Africa has been centred on mining activities, their ancillary services and supplies. The country's stock exchange in Johannesburg was established in 1887, a decade after the first diamonds were discovered on the banks of the Orange River, and almost simultaneously with the gold rush on the world-famous Witwatersrand.

In many ways, South Africa's political, social and economic landscape has been dominated by mining, given that, for so many years, the sector has been the mainstay of the South African economy. Although gold, diamonds, platinum and coal are the most well-known among the minerals and metals mined, South Africa also hosts chrome, vanadium, titanium and a number of other lesser minerals.

In 2018 the mining sector contributed R351 billion to the South African gross domestic product (GDP). A total of 456,438 people were employed in the mining sector in 2018. Each person employed in the mining sector has up to nine indirect dependents. The mining sector has, for many years, attracted valuable foreign direct investment to South Africa. (Mineral Council, 2021)

Diamonds, arguably the ultimate luxury mineral, comprise an intricate lattice of carbon atoms, a crystalline structure that makes them harder than any other form in nature. This characteristic makes diamonds not only popular in jewellery, but also desirable in high-tech cutting, grinding and polishing tools (Chamber of Mines, South Africa, 12:2016).

According to the Chamber of Mines the country's diamond sector is far from reaching the end of its life even though diamond mining has been taking place in South Africa for almost a century and a half. The primary sources of all of South Africa's diamonds are kimberlites in ancient, vertically dipping volcanic pipes most of which were located in the vicinity of the city of Kimberley and which were initially amenable to open-cast.

Economic growth - South Africa's total reserves remain some of the world's most valuable, with an estimated worth of R20.3-trillion. Overall, the country is estimated to have the world's fifth-largest mining sector in terms of GDP value.

With South Africa's economy built on gold and diamond mining, the sector is an important foreign exchange earner, with gold accounting for more than one-third of exports. In 2009, the country's diamond industry was the fourth largest in the world.

Mining is a cornerstone of the economy, making a significant contribution to economic activity, job creation and foreign exchange earnings. Mining and its related industries are critical to South Africa's socio-economic development.

G. A MOTIVATION FOR THE PREFERRED DEVELOPMENT FOOTPRINT

(-within the approved site as contemplated in the accepted scoping report;)

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

Location of the site

The location of the site is preferred due to the presence of shallow Diamonds (Alluvial & in Kimberlite). Access will be obtained from a nearby tar road adjacent to the property (N14). Access will be gained to the property through a gravel road linked to the nearby tar road.

As discussed in the previous section, based on outcomes of previous studies in the vicinity of the proposed site, the possibility to encounter high volumes of Diamonds (Alluvial, General & in Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province, are expected.

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The site is largely covered by cultivated fields, low schrubland & tickets/open bushes

Preferred activity

The prospecting of Diamonds (Alluvial, in Kimberlite, General) & Diamonds is the optimum preferred activity for the site. The shallow diamond deposits makes the site ideal for Diamonds (Alluvial, in Kimberlite, General) & Diamonds mining.

H. A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED DEVELOPMENT FOOTPRINT

(-within the approved site as contemplated in the accepted scoping report, 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. No other properties have been secured by **Mopane Tree SA (Pty) Ltd** near the proposed area to potentially mine diamonds (Alluvial, in Kimberlite, General) & Diamonds. Also, it is expected that the Diamonds (Alluvial, in Kimberlite, General) & Diamonds 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 proposed development falls within **Land in Class 7**; which has very severe limitations that makes it unsuited to cultivation and that restrict its use largely to grazing, woodland or wildlife.

- Restrictions are more severe than those for Class 6 because of one or more continuing limitations that cannot be corrected, such as:
 - Very steep slopes.
 - Erosion.
 - Shallow soil.
 - Stones.
 - Wet soil.
 - Salts or sodicity.
 - Unfavourable climate.
- Physical conditions are such that it is impractical to apply such pasture or range improvements as seeding, liming and fertilizing.
- Depending on soil characteristics and climate, land in Class 7 may be well or poorly suited to woodland.
- In unusual instances some occurrences may be used for special crops under unusual management practices. (AGIS, 2016)..

Refer to Land capability map attached as **Appendix 5 & figure 3 below**.

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The applicant will proceed with this way of prospecting by means of the open cast/trenching method, simultaneously or after pitting depending on the information obtained from the earlier work done. The trenches will be dug to remove and wash the gravel. It will be washed by 2x16 feet washing pans to determine diamond proceeds per 100 tons of gravel.

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

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

- **No-go alternative**

This alternative considers the option of 'do nothing' and maintaining the status quo. The description provided in section H of this report could be considered the baseline conditions (status quo) to persist should the no-go alternative be preferred. Should the proposed activity not proceed, the site will remain unchanged.

- **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 remove the diamond bearing gravel with an excavator, depositing it in the 2 16 feet washing pan(s) to be washed and sorted. Please find the Prospecting Work Programme attached as **Appendix 9**.

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

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

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

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

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

In a Rotary Pan plant, crushed ore, when mining kimberlite, or alluvial gravel and soil is mixed with water to create a liquid slurry called "puddle" which has a density in the 1.3 to 1.5 g/cm³ range. The mix is stirred in the pan by angled rotating "teeth".

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The heavier minerals, or “concentrate”, settle to the bottom and are pushed toward an extraction point, while lighter waste remains suspended and overflows out of the centre of the pan as a separate stream of material. The concentrate, representing just a small percentage of the original kimberlite ore or alluvial gravels, is drawn off for final recovery of the diamonds.

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

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

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

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

ii) Details of the Public Participation Process Followed

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

The Public Participation Process (PPP) must follow Regulation 41 of NEMA EIA Regulations; thus, the process needs to be transparent. However, due to the Protection of Personal Information Act (POPI Act) which commenced on 01 July 2021, Stakeholders, Landowners, surrounding landowners and registered I&AP' addresses, contact details and comments will not be included in any draft report to be circulated. All this information will form part of the final report to be submitted to the Competent Authority only.

Should you be identified as a Stakeholder, Landowner, Surrounding landowner and you do not wish to receive any further communicate from Milnex CC regarding the application in question, you may request in writing that your details be removed from the Milnex CC database for this application.

Advertisement and Notices

An advertisement was placed in English in the newspaper (**Gemsbok**) (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 CC. I&APs were given the opportunity to raise comments within 30 days of the advertisement.

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Site notices

Site notices were placed (on the coordinates below) on site in English 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 are included in **Appendix 6**. Below are the coordinates where the site notices were placed.

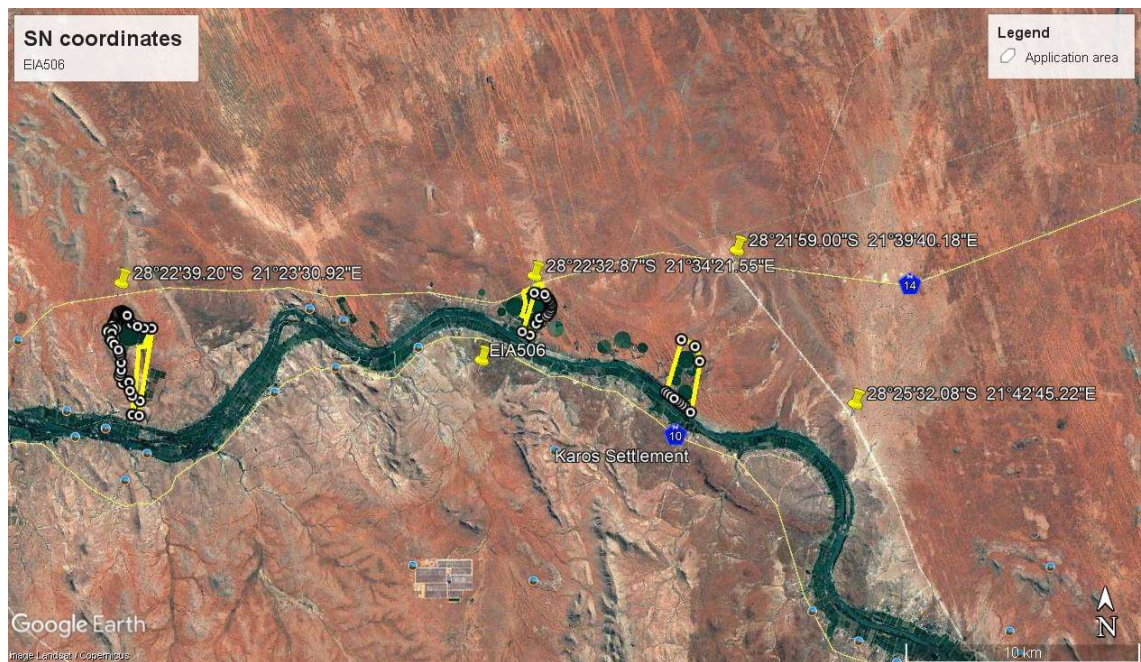


Figure 4: Site notice co-ordinates

Direct notification and circulation of Scoping Report to identified I&APs, landowners and occupiers

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 and email on **31 August 2021** and were requested to submit comments by **01 October 2021**. A copy of the report was 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:

Table 1: List of Stakeholders, Landowners, & surrounding landowners

Stakeholders
Department of Agriculture, Environmental Affairs, Rural Development (DAEARD)
Department of Co-operative Governance, Human Settlements and Traditional Affairs (COGHSTA)
Department of Economic Development and Tourism (DEDAT)
Department of Roads and Public Works (DR&PW)
Department of Transport, Safety and Liaison (DTSL)
Department of Social Development (DSD)
Northern Cape Tourism Authority
Northern Cape Heritage Resources Authority (NCHRA)
Department of Mineral Resources and Energy (DMRE)
Department of Human Settlements, Water and Sanitation (DHSWS)
SANRAL
Commission of Restitution of Land Rights.
Khara Hais Local Municipality: The municipal manager
Khara Hais Local Municipality: Ward 9 Councillor
ZF Mqgawu District Municipality
WESSA

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Landowner
Torghoff Boerdery (Pty) Ltd
Francois Gerhardus Johannes Wiid
Jacobus Adriaan Johannes Hanekom
Surrounding landowners
North Western Motors (Pty) Ltd
Kameeldoring Trust
UAP Trust
Willemina Schalkfina & Jacobus Bekker
Jacobus Petrus Spangenberg
Aletta Magrietha & Johannes Jacobus Petrus Booysen
Tiaan Bredekamp
Sandra van Rensburg
Johanna Elizabeth Barnard
Jacobus Adriaan Johannes Hanekom
Van Der Wath landgoed
Bermaritus Trust
Johan Petrus Jacobus De jager Trust
JCR Quality Meat (Pty) Ltd
Beulah & Dawid Marthinus De Klerk
Honiball Familie Trust
QCK Lezmin 4211 CC
Francois Maritz Gesinstrust

2. Consultation

Due to the Covid-19 nation-wide lockdown the public meeting could not be carried due to the circumstances. The option to hold a public meeting via Zoom was considered if the landowners, surrounding landowners and stakeholders would comply. Refer to **Appendix 6 for the Public Participation Plan**.

Until date no meeting has been requested by any of the I&AP's

Direct notification and circulation of Draft EIR & EMPr to identified I&APs, landowners and occupiers

Identified I&APs, including key stakeholders representing various sectors, are directly informed of the proposed development and the availability of the Draft EIR & EMPr via registered post on **11 January 2022** and were requested to submit comments by **10 February 2022**. 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**.

It must be noted that DMRE provided comments of the Final EIR & EMPr 08 March 2022, requesting additional specialist studies. The specialist studies were included in this Final Amended Environmental Impact Report.

Issues Raised by Interested and Affected Parties

Comments received during this period are attached as comment & response report as well as populated in the table of summary of issues raised.

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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		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			
Landowner				
UAP 29/418	Jacobus Adriaan Johannes Hanekom	No Comment		
Adeisestad 7/409 & Farm 596	Torqhoff Boerdery (Pty) Ltd Francois Gerhardus Johannes Wiid			
UAP RE 21/418 & Kalkpunt 1/407	Francois Gerhardus Johannes Wiid	No Comment		
Surrounding Landowners				
UAP 36/418	North Western Motors (Pty) Ltd: Izak Andreas van Niekerk			
UAP 33/418	Kameeldoring Trust			
UAP RE/0/418	U A P Trust: Carolina Maria van Der Walt			
UAP 23/418	Willemina Schalkfina & Jacobus Bekker			

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UAP 5/418	Jacobus Petrus Spangenberg			
UAP 15/418	Aletta Magrietha & Johannes Jacobus Petrus Booysen			
UAP 17 now portion 45 /418	Tiaan Bredekamp			
UAP 32/418	Sandra van Rensburg			
UAP 39/418	Johanna Elizabeth Barnard			
UAP 10/418	Jacobus Adriaan Johannes Hanekom			
Rouxville 8/417	Van Der Wath Landgoed CC: Johannes gert Hendrik van Der Wath			
Rouxville 27/417	Bermaritus Trust: Bertus Nel Kilian			
Avondale 1/410	Johan Petrus Jacobus De Jager Trust			
Avondale 2 & 3/410	J C R Quality Meat (Pty) Ltd: Annette & Johannes Nicolaas basson			
Adeisestad 4/409	No info			
Adeisestad 1/409	Beulah & Dawid Marthinus de Klerk			
BOEGOEBERGNERSETTING RE/0/48	no info			

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Farm 406/2 portions	no info			
Openwater RE/0/408	Honiball Familie Trust: Chris Honniball & Andre Ehlers			
Openwater 2/408	QCK Lezmin 4211 CC: Jacolene Page & Marlene Laetitia Nel			
Kalkpunt RE/0/407	Francois Maritz Gesintrust Francois Maritz & Pieter Steyn Lange	<p>Email received by Lange Carr & Wessels Attorneys on behalf of the Trustees of the Francois Maritz Gesintrust, with the attached letter:</p> <p>The writer hereof acts in his capacity as Trustee of the Francois Maritz Gesintrust – T10/1995(K), which Trust is the registered owner of: “Resterende Gedeelte van die plaas Kalkpunt 407, gelee in die afdeling Gordonia, Provinsie Noord-Kaap, Groot 5 099,2132 Hektaar”</p> <p>Please note that your letter dated 31 August 2021, wherein notice is given in terms of the EIA regulations published in the Government Notice No 326 under section 39 – 44 of the NEMA Act No 107 of 1998 was received per registered post at our offices on the 4th of October 2021, exactly three days late of closing date for delivering comments on the report.</p> <p>We object to the late notice and request that the proof of posting such notice to the above mentioned Trust be furnished by return email or post.</p> <p>Your drop box link is also inaccessible and we thus request that we be emailed with all relevant documents with all relevant documents pertaining to the Draft Scoping Report.</p> <p>We at this point in time draw your attention to the deletion of the EIA Regulation 39(2)(b) which sine 11 June 2021 requires applicants of Environmental Applications for mining related activities to obtain the written consent from the landowners prior to submitting of applications.</p>	<p>A telephonic conversation ensued in October between a representative of the Francois Maritz Gesintrust and mr Christiaan Baron from Milnex CC.</p> <p>Mr Baron indicated that the Francois Maritz Gesintrust who is the owner of the Remaining Extent of the farm Kalkpunt 407 is a surrounding landowner and not a landowner of any of the applied for portions. Land owner consent will thus be obtained from the owner who owns portions that were applied for.</p> <p>The representative then acknowledges of what has been discussed and the phone call was ended.</p> <p>No further communication ensued.</p> <p>The letter containing the link to the draft Environmental Impact Assessment Report was posted on 11/01/2022 to the address of the Francois Maritz Gesintrust, but no further comment was received.</p>	

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		As Trustee of aforementioned Trust, writer is unaware that such consent was granted as required by the regulations and therefore a copy thereof must also, please be furnished to us. Your faithfully Lange Carr & Wessels ING./INC.		
The Municipality in which jurisdiction the development is located				
Khara Hais Local Municipality	Municipal Manager (Acting): Mr Martin Fillis			
Municipal councillor of the ward in which the site is located				
Thembelihle Local Municipality Ward 9 Councillor	To whom it may concern			
Organs of state having jurisdiction				
Department of Agriculture, Environmental Affairs, Rural Development (DAEARD)	Head of Department: Ms. Mase Manopole			
Department of Co-operative Governance, Human Settlements and Traditional Affairs (COGHSTA)	Head of Department: Mr Bafedile Lenkoe			
Department of Economic Development and Tourism (DEDAT)	Head of Department: Mr T Mabija			
Department of Roads and Public Works (DR&PW)	Head of Department: Mr K Nogwili			
Department of Transport, Safety and Liaison (DTSL)	Head of Department Mr. M. Dichaba			
Department of Social Development (DSD)	Head of Department Ms H Samson			
Northern Cape Tourism Authority	Chairperson: Mr Colin Fortune			
Northern Cape Heritage Resources Authority (NCHRA)	Senior Management: Mrs Rose Kelebogile (Senior Admin) and			

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	Mr Ratha Andrew Timothy (Manager)			
Department of Mineral Resources and Energy (DMRE)	Regional Manager: Mr Ndlelenhle Zindela Secretary: Ms Ntombi Mayekiso			
	Humbulani Mashau	<p>1. I refer to the above mentioned matter and confirm that your application for an Environmental Authorization herein referred to as 'EA' lodged on 19th July 2021 is hereby acknowledged.</p> <p>Please ensure that acceptance letter of an MPRDA application, comments from all stakeholders, are submitted together with the relevant Environmental Report/s to the department in order for the department to consider and come to an informed decision, and to effectively effect the correct NEMA stipulated timelines in respect of your application.</p> <p>NB: Regulation 45 of 2014 EIA Regulations stipulates that “an application in terms of these regulations lapses and a competent authority will deem the application as having lapsed, if the applicant fails to meet any of the time-frames prescribed in terms of these regulations, unless extension has been granted in terms of regulation 3(7).</p>		
	Tumelo Sedupane	<p>Email received on 14/12/2021</p> <p>With the following attachment:</p> <p>1. This is to inform you that your application for a prospecting right in terms of sections 16 and 20 of the MPRDA, 2002 (Act 28 of 2002) to prospect for Diamond (Alluvial, General and in Kimberlite) has been accepted.</p> <p>2. In terms of section 12 (d) of the Act, you are directed to comply with the following instructions:</p> <p>a. Notify and consult the landowner, lawful occupier and any I&AP and include the the consultation in the environmental</p>		

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		<p>reports in line with Regulation 41(2) read with section 24J of the National Environment Act 1998.</p> <p>b. Lodge an application in terms of the National Water Act No.36 of 1998 with the Department of Water Affairs with immediate effect.</p> <p>3. Your attention is drawn to the provisions of Section 17(1)(e) of the MPRDA.</p> <p>4. You are reminded to ensure that all payment of all prospecting fees for all the prospecting rights you hold, are up to date, failing which may have a negative impact on the outcome of your current application.</p> <p>5. Further note that the acceptance of your application does not grant you the right to commence with prospecting activities. It only signify that your application will be processed, evaluated and the Minister or his delegate will make a decision within 197 days from the date of lodgement.</p>		
Department of Human Settlements, Water and Sanitation (DHSWS)	Mr Khutjo Kwena Sekwaila (WUL Manager)			
Commission of Restitution of Land Rights.	Chief Director: Ms. M. Du Toit			
			<p>Email sent on 22 July 2021</p> <p>Good day all.</p> <p>I trust all is well with you.</p> <p>May your office kindly assist with the land claims.</p> <p>Response Letter Khara Hais Local Municipality</p> <p>I have attached the deeds searches.</p>	

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			Regards	
		<p>Email received on 22 July 2021</p> <p>Good day</p> <p>We acknowledge receipt of below mentioned enquiry and will respond to same within 14 working days.</p> <p>Pabalelo Mokale</p>		
		<p>Email received on 22 July 2021</p> <p>Good day</p> <p>Please find the attached land claim enquiry response letters for your attention:</p> <p>LAND CLAIMS ENQUIRY</p> <p>Portion 7 of the farm Adeisestad no.409 registration division of Gordonia RD 109.7836Ha Khara Hais Local Municipality in the Northern Cape Province.</p> <p>Portion 1 of the farm Kalkpunt no.407 registration division of Gordonia RD 230.1289Ha Khara Hais Local Municipality in the Northern Cape Province.</p> <p>Remaining extent of portion 21 farm Uap no.418 registration division of Gordonia RD 109.7836Ha Khara Hais Local Municipality in the Northern Cape Province.</p>		

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		<p>Portion 29 of the farm Uap no.418 registration division of Gordonia RD 109.7836Ha Khara Hais Local Municipality in the Northern Cape Province.</p> <p>Portion 0 of the farm Plaas no.596 registration division of Gordonia RD 54.2431Ha Khara Hais Local Municipality in the Northern Cape Province.</p> <p>We confirm that as at the date of this letter that no land claim appears on our database in respect of the Properties this includes the database for claims lodged by 31 December 1998; and those lodged between 1 July 2014 and 27 July 2016 in terms of the Restitution of Land Rights Amendment Act, 2014.</p> <p>Whilst the Commission takes reasonable care to ensure the accuracy of the information it provides, there are various factors that are beyond the Commission's control, particularly relating to claims that have lodged but not yet been gazetted such as:</p> <ul style="list-style-type: none"> • Some Claimants referred to properties they claim dispossession of rights in land against using historical property descriptions which may not match the current property description; and • Some Claimants provided the geographic descriptions of the land they claim without mentioning the particular actual property description they claim dispossession of rights in land against. <p>The Commission therefore does not accept any liability whatsoever if through the process of further investigation of claims it is found that there is in fact a land claim in respect of the above property.</p> <p>If you are aware of any change in the description of the above property after 19 June 1913 kindly supply us with such description so as to enable us to do a further search.</p> <p>Yours faithfully Ms. M Du Toit</p>		
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		Kindly confirm upon receipt		
SANRAL Northern Region	To Whom it may concern			
Other–				
ZF Mgcawu District Municipality	Municipal Manager: Mr Gilbert Lategan			
WESSA	Graham Avery			

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- iv) the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

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.

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

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

DEA Screening Report

Please note that 3 screening tool reports have been generated as the properties are apart from each other and 1 screening tool only allows one polygon.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area according to the DEA Screening Tool.

RE of portion 21 & portion 29 of the Farm UAP 418

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	14/12/16/3/3/2/619	Solar PV	Approved	15.5
2	14/12/16/3/3/2/290	Solar PV	Approved	3.9
3	12/12/20/2169	Solar PV	Approved	2.1
4	14/12/16/3/3/2/297	Solar CSP	Approved	3.9
5	14/12/16/3/3/2/291	Solar PV	Approved	3.9
6	14/12/16/3/3/2/292	Solar PV	Approved	3.9
7	14/12/16/3/3/2/618	Solar PV	Approved	15.5
8	12/12/20/2056	Solar CSP	Approved	1.8
9	14/12/16/3/3/2/293	Solar CSP	Approved	6.1
10	14/12/16/3/3/2/298	Solar CSP	Approved	3.9
11	14/12/16/3/3/2/289	Solar PV	Approved	3.9
12	14/12/16/3/3/2/614	Solar PV	Approved	15.7
13	14/12/16/3/3/2/821	Solar PV	Approved	8
14	12/12/20/2146	Solar PV	Approved	10.8
15	14/12/16/3/3/2/294	Solar CSP	Approved	14
16	14/12/16/3/3/2/296	Solar CSP	Approved	3.9

Portion 7 of the Farm Adeisestad 409 & Farm 596

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	14/12/16/3/3/2/619	Solar PV	Approved	0.3
2	14/12/16/3/3/2/290	Solar PV	Approved	12.3
3	12/12/20/2169	Solar PV	Approved	12.9
4	14/12/16/3/3/2/297	Solar CSP	Approved	12.2
5	14/12/16/3/3/2/291	Solar PV	Approved	12.3
6	14/12/16/3/3/2/639	Solar PV	Approved	14
7	14/12/16/3/3/2/292	Solar PV	Approved	12.3
8	14/12/16/3/3/2/618	Solar PV	Approved	0.3
9	12/12/20/2056	Solar CSP	Approved	8.6
10	14/12/16/3/3/2/293	Solar CSP	Approved	8.6
11	14/12/16/3/3/2/298	Solar CSP	Approved	12.2
12	14/12/16/3/3/2/289	Solar PV	Approved	12.2
13	14/12/16/3/3/2/614	Solar PV	Approved	0.3
14	14/12/16/3/3/2/821	Solar PV	Approved	25
15	14/12/16/3/3/2/294	Solar CSP	Approved	10.7
16	14/12/16/3/3/2/296	Solar CSP	Approved	12.2

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Portion 1 of the Farm Kalkpunt 407

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	14/12/16/3/3/2/619	Solar PV	Approved	7.6
2	14/12/16/3/3/2/290	Solar PV	Approved	17.5
3	12/12/20/2169	Solar PV	Approved	20.4
4	14/12/16/3/3/2/297	Solar CSP	Approved	17.5
5	14/12/16/3/3/2/291	Solar PV	Approved	17.5
6	14/12/16/3/3/2/639	Solar PV	Approved	6.3
7	14/12/16/3/3/2/292	Solar PV	Approved	17.5
8	14/12/16/3/3/2/618	Solar PV	Approved	7.6
9	12/12/20/2056	Solar CSP	Approved	13.6
10	14/12/16/3/3/2/293	Solar CSP	Approved	13.7
11	14/12/16/3/3/2/298	Solar CSP	Approved	17.5
12	14/12/16/3/3/2/289	Solar PV	Approved	17.5
13	14/12/16/3/3/2/614	Solar PV	Approved	7.6
14	14/12/16/3/3/2/821	Solar PV	Approved	29.7
15	14/12/16/3/3/2/294	Solar CSP	Approved	9.5
16	14/12/16/3/3/2/296	Solar CSP	Approved	17.5

According to the DEA Screening Tool the proposed development area Environmental sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme	Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418			
Animal Species Theme			Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418	
Aquatic Biodiversity Theme	Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418			
Archaeological & Cultural Heritage Theme				Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596

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				RE of portion 21 & portion 29 of the Farm UAP 418
Civil Aviation Theme			RE of portion 21 & portion 29 of the Farm UAP 418	Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596
Defence Theme			RE of portion 21 & portion 29 of the Farm UAP 418	Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596
Paleontology Theme			Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418	
Plant Species Theme				Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418
Terrestrial biodiversity Theme	Portion 1 of the Farm Kalkpunt 407 Portion 7 of the Farm Adeisestad 409 & Farm 596 RE of portion 21 & portion 29 of the Farm UAP 418			

Geology and Soils

Kheis Terrane (Mle – Metabasalt, felsic lava, Greenschist, conglomerate & ferruginous schist)

Classification

The Leerkrans Formation of the Wilgenhoutsdrif Group is a succession of highly sheared metasedimentary and metavolcanic rocks separating the western margin of the Archean Kaapvaal Craton from the polydeformed and highly metamorphosed Proterozoic Namaqua Sector of the Namaqua-Natal Province. Highly chloritised and epidotised metabasalts from the Lower Basalt are typically flow-banded, massive, vesicular or amygdaloidal, and have primitive tholeiitic, MORB-like geochemical characteristics.

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The Upper Basalt and Mixed Zone of the Leerkrans Formation are comprised of basaltic lavas showing similar geochemical features to the Lower Basalt. The metavolcanic rocks of the Leerkrans Formation overlap in age with the oldest units of the ~1.3 to ~1.23 Ga Areachap Group, the polydeformed and highly metamorphosed remnants of a volcanic arc that separates the western margin of the Kaapvaal Craton from the Namaqua Sector. The Leerkrans Formation likely represents the remnants of a related back-arc basin to the volcanic arc which was accreted onto the western margin of the craton

Ecological habitat and landscape features

The result obtained by plotting the coordinates are as follow:

The proposed area falls within vegetation units **Gordonia Duneveld, Kalahari Arid Grassland & a small portion of Lower Gariep Alluvial Vegetation**

The following information has been sourced from Mucina & Rutherford (2006)

SVkd 1 Gordonia Duneveld Vegetation Unit:

Distribution Northern Cape Province: Areas with dunes comprising the largest part of the South African side of the Kgalagadi Transfrontier Park. South of the Molopo River border with Botswana (west of Van Zylsrus), interleaving with NKb 5 Kalahari Karroid Shrubland in the west (south of Rietfontein to the Orange River area) and in the south (around Upington and north of Groblershoop). Also occurs as a number of loose dune cordons south of the Orange River near Keimoes and between Upington and Putsonderwater. Eastern boundary is found at the longitude of Pearson's Hunt, but with outliers near Niekerkshoop in the southeast and Floradora in the northeast. Altitude 800–1 200 m.

Vegetation & Landscape Features Parallel dunes about 3–8 m above the plains. Open shrubland with ridges of grassland dominated by *Stipagrostis amabilis* on the dune crests and *Acacia haematoxylon* on the dune slopes, also with *A. mellifera* on lower slopes and *Rhigozum trichotomum* in the interdune strata.

Geology & Soils Aeolian sand underlain by superficial silcretes and calcretes of the Cenozoic Kalahari Group. Fixed parallel sand dunes, with Af land type almost exclusively.

Climate Summer and autumn rainfall with very dry winters. MAP about 120–260 mm. Frost fairly frequent to frequent in winter. Mean monthly maximum and minimum temperatures for Vrouenspan 41.5°C and –4.0°C for December and July, respectively. See also climate diagram for SVkd 1 Gordonia Duneveld.

Important Taxa Small Tree: *Acacia mellifera* subsp. *detinens* (d). Tall Shrubs: *Grewia flava* (d), *Rhigozum trichotomum* (d). Low Shrubs: *Aptosimum albomarginatum*, *Monechma incanum*, *Requienia sphaerosperma*. Succulent Shrubs: *Lycium bosciifolium*, *L. pumilum*, *Talinum cafferum*. Graminoids: *Schmidtia kalahariensis* (d), *Brachiaria glomerata*, *Bulbostylis hispidula*, *Centropodia glauca*, *Eragrostis lehmanniana*, *Stipagrostis ciliata*, *S. obtusa*, *S. uniplumis*. Herbs: *Hermbstaedtia fleckii* (d), *Acanthosicyos naudinianus*, *Hermannia tomentosa*, *Limeum arenicolum*, *L. argute-carinatum*, *Oxygonum dregeanum* subsp. *canescens* var. *canescens*, *Sericorema remotiflora*, *Sesamum triphyllum*, *Tribulus zeyheri*.

Biogeographically Important Taxa (Kalahari endemics) Tall Shrub: *Acacia haematoxylon* (d). Graminoids: *Stipagrostis amabilis* (d), *Antheophora argentea*, *Megaloprotachne albescens*. Herbs: *Helichrysum arenicola*, *Kohautia ramosissima*, *Neuradopsis austro-africana*.

Conservation Least threatened. Target 16%. Some 14% statutorily conserved in the Kgalagadi Transfrontier Park. Very little transformed. Generally low erosion, but some areas with spectacular destabilisation of normally vegetated dunes (through local overstocking) favoured by photographers. Erosion is normally very low.

Remarks The unit extends into Namibia to a large extent (Leistner 1967) and very little into Botswana. Only degenerates into semimobile dunes, where heavily disturbed through intense grazing pressure.

AZa 3 Lower Gariep Alluvial Vegetation Unit

Distribution Northern Cape Province: Broad alluvium (floodplains and islands) of the Orange (Gariep) River between Groblershoop and the mouth into the Atlantic Ocean at Oranjemund (Namibia). This river stretch is embedded within Desert (Oranjemund to roughly Pofadder) and Nama-Karoo (further upstream as far as Groblershoop). Altitude ranging from 0–1 000 m.

Vegetation & Landscape Features Flat alluvial terraces and riverine islands supporting a complex of riparian thickets (dominated by *Ziziphus mucronata*, *Euclea pseudebenus* and *Tamarix usneoides*), reed beds with *Phragmites australis* as well as flooded grasslands and herblands populating sand banks and terraces within and along the river.

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Geology, Soil & Hydrology Recent alluvial deposits of the Orange River supporting soil forms such as Dundee and Oakleaf. The river cuts through a great variety of Precambrian metamorphic rocks. la land type. Subject to floods, especially in summer, caused by high precipitation on the highveld.

Climate Region with very arid (desert) to subarid (semidesert) climate and erratic, unimodal (winter-rainfall) regime in the extreme west (near the Orange River mouth) to bimodal, equinoctial with major peak in March and less pronounced peak in November in the extreme east (near Upington). MAP 40–150 mm and MAT between 15.4°C (Alexander Bay) and 20.5°C (Upington). See also climate diagram for AZa 3 Lower Gariep Alluvial Vegetation (Figure 13.2).

Important Taxa Riparian thickets Small Trees: *Acacia karroo* (d), *Euclea pseudebenus* (d), *Salix mucronata* subsp. *mucronata* (d), *Schotia afra* var. *angustifolia* (d), *Ziziphus mucronata* (d), *Acacia erioloba*, *Combretum erythrophyllum*, *Ficus cordata*, *Maerua gilgii*, *Prosopis glandulosa* var. *glandulosa*, *Rhus lancea*. Tall Shrubs: *Gymnosporia linearis* (d), *Tamarix usneoides* (d), *Ehretia rigida*, *Euclea undulata*, *Sisyndite spartea*. Low Shrub: *Asparagus laricinus*. Woody Climber: *Asparagus retrofractus*. Succulent Shrub: *Lycium bosciifolium*. Herb: *Chenopodium olukondae*. **Reed beds** Megagraminoid: *Phragmites australis* (d). **Flooded grasslands & herblands** Low Shrubs: *Tetragonia schenckii* (d), *Litogyne gariepina*. Graminoids: *Cynodon dactylon* (d), *Setaria verticillata* (d), *Cenchrus ciliaris*, *Cyperus laevigatus*, *Eragrostis echinochloidea*, *Leucophrys mesocoma*, *Polypogon monspeliensis*, *Stipagrostis namaquensis*. Herbs: *Amaranthus praetermissus*, *Coronopus integrifolius*, *Frankenia pulverulenta*, *Gnaphalium confine*, *Pseudognaphalium luteo-album*.

Conservation Endangered. Target 31%. About 6% statutorily conserved in the Richtersveld and Au-grabies Falls National Parks. Some 50% transformed for agricultural purposes (vegetables and grapes) or alluvial diamond mining. *Prosopis* species, *Nicotiana glauca* and *Argemone ochroleuca* can invade the alluvia in places.

NKb 5 Kalahari Karroid Shrubland

Vegetation & Landscape Features Low karroid shrubland on flat, gravel plains. Karoo-related elements (shrubs) meet here with northern floristic elements, indicating a transition to the Kalahari region and sandy soils.

Geology & Soils Cenozoic Kalahari Group sands and small patches also on calcrete outcrops and screes on scarps of intermittent rivers (mekgacha). In places Dwyka Group tillites outcrop. The soils are deep (>300 mm), red-yellow, apedal, freely drained, with a high base status, typical of Ae land type.

Climate MAP ranges from about 100–200 mm and most rain falls in late summer and early autumn. Winters are particularly dry, with lowest winter relative humidity compared to other Nama-Karoo types. Mean maximum and minimum monthly temperatures in Upington are 39.5°C and –4.2°C for January and July, respectively. Solar radiation is high and in winter is higher than in any other vegetation type of the Nama-Karoo. See also climate diagram for NKb 5 Kalahari Karroid Shrubland (Figure 7.2).

Important Taxa Small Trees: *Acacia mellifera* subsp. *detinens* (d), *Parkinsonia africana* (d), *Boscia foetida* subsp. *foetida*. Tall Shrub: *Rhigozum trichotomum* (d). Epiphytic Semiparasitic Shrub: *Tapinanthus oleifolius*. Low Shrubs: *Hermannia spinosa* (d), *Limeum aethiopicum* (d), *Phaeoptilum spinosum* (d), *Aizoon schellenbergii*, *Aptosimum albomarginatum*, *A. lineare*, *A. marlothii*, *A. spinescens*, *Barleria rigida*, *Hermannia modesta*, *Indigofera heterotricha*, *Leucosphaera bainesii*, *Monechma genistifolium* subsp. *genistifolium*, *Phyllanthus maderaspatensis*, *Polygala seminuda*, *Ptychobium biflorum* subsp. *biflorum*, *Sericocoma avolans*, *Solanum capense*, *Tephrosia dregeana*. Herbs: *Dicoma capensis* (d), *Chamaesyce inaequilatera* (d), *Amaranthus praetermissus*, *Barleria lichtensteiniana*, *Chamaesyce glanduligera*, *Chascanum garipense*, *Cleome angustifolia* subsp. *diandra*, *Cucumis africanus*, *Geigeria ornativa*, *Hermannia abrotanoides*, *Indigastrum argyraeum*, *Indigofera alternans*, *I. auricoma*, *Kohautia cynanchica*, *Limeum argute-carinatum*, *Mollugo cerviana*, *Monsonia umbellata*, *Sesamum capense*, *Tribulus cristatus*, *T. pterophorus*, *T. terrestris*. Succulent Herbs: *Gisekia africana*, *G. pharnacioides*, *Trianthema parvifolia*. Graminoids: *Aristida adscensionis* (d), *Enneapogon desvauxii* (d), *E. scaber* (d), *Stipagrostis obtusa* (d), *Aristida congesta*, *Enneapogon cenchroides*, *Eragrostis annulata*, *E. homomalla*, *E. porosa*, *Schmidtia kalahariensis*, *Stipagrostis anomala*, *S. ciliata*, *S. hochstetteriana*, *S. uniplumis*, *Tragus berteronianus*, *T. racemosus*.

Biogeographically Important Taxon (Southwestern distribution limit) Graminoid: *Dinebra retroflexa*.

Conservation Least threatened. Target 21%. Very little statutorily conserved in Au-grabies Falls National Park. Although only a small area has been transformed many of the belts of this type were preferred routes for early roads, thus promoting the introduction of alien plants (about a quarter of the unit has scattered *Prosopis* species). Erosion is very low (94%).

Remarks Vegetation of this mapping unit shows transitional features between the Kalahari proper (Savanna Biome) and the northern Nama-Karoo.

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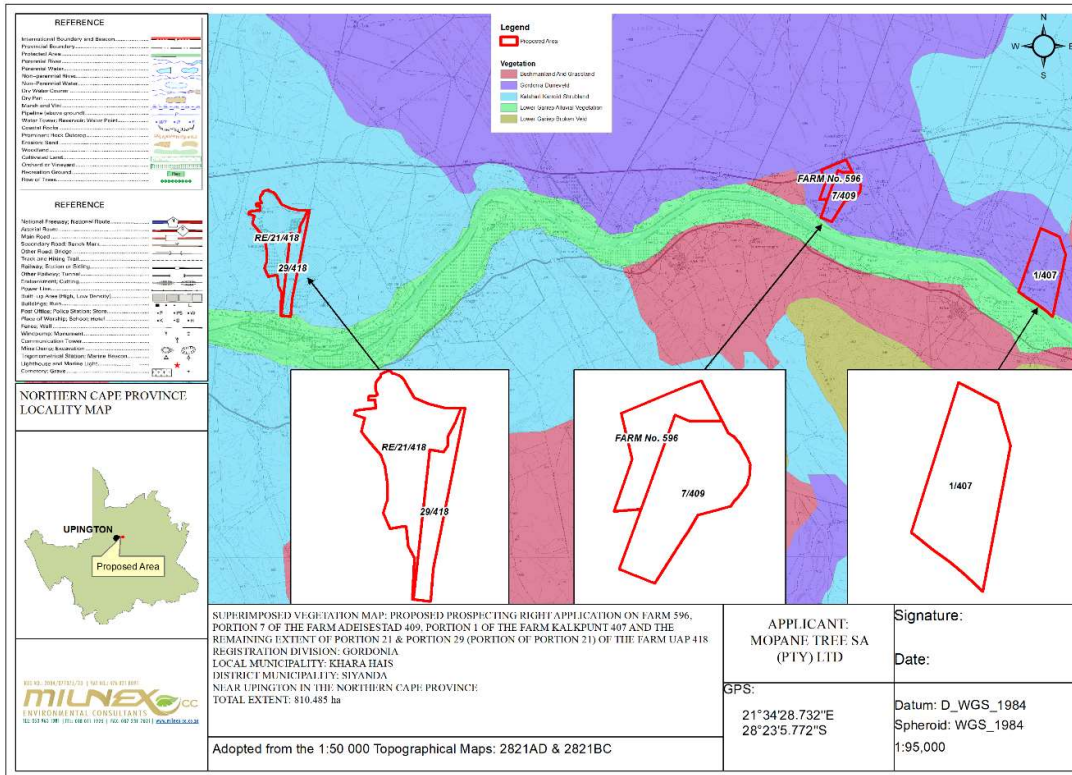


Figure 5: Vegetation types associated with the study site (Mucina & Rutherford 2006/2018).

According to the DEA screening tool, the application area falls within a low relative Plant Species theme sensitivity area (see figure 6 below) Please see Appendix 7 for the colour map.



Figure 6: Plant Species Combined Sensitivity

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Threatened Ecosystems

Ecosystem threat status outlines the degree to which ecosystems are still intact or alternatively losing vital aspects of their structure, function and composition, on which their ability to provide ecosystem services ultimately depends (Driver *et al.* 2011). Datasets have been developed by SANBI (2016) in order to outline threatened ecosystems, with the primary objective of limiting the rate of ecosystem extinctions. Four established categories group these ecosystems namely: Critically Endangered (CR), Endangered (EN), Vulnerable (VU) and Protected.

No threatened terrestrial ecosystems were identified within the vicinity of the study site (Figure 7).

Protected Areas

Formally protected areas are protected either by national or provincial legislation. Based on the SANBI (2010) Protected Areas Map (Figure 7), the study site does not overlap with any formally protected area. Therefore, the location of the study site is not expected to have an impact on any formally protected areas.

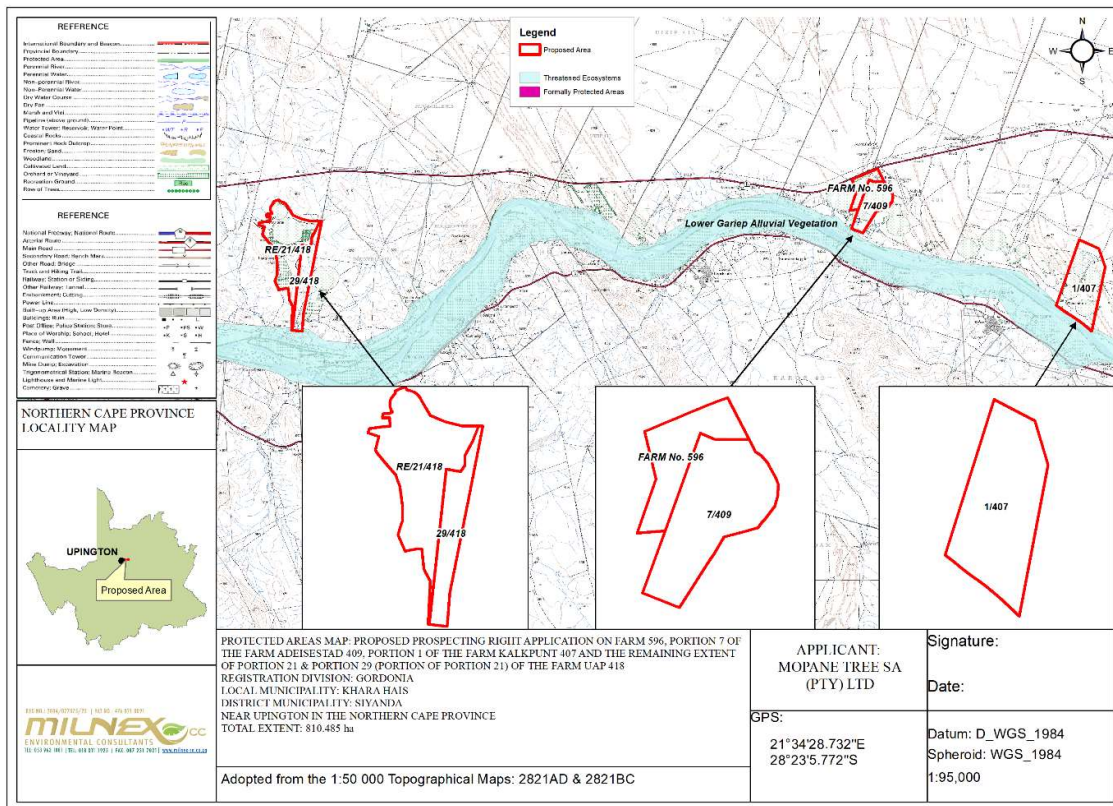


Figure 7: Threatened and Protected Areas Map

Critical Biodiversity Area

Critical Biodiversity Areas (CBAs) are terrestrial and aquatic areas of high biodiversity value that need to be conserved and maintained in a natural or near-natural state to ensure the continued existence and functioning of species and ecosystems and the delivery of ecosystem services (MTPA, 2014). According to the National Environmental Management Act (NEMA) (Act no. 107 of 1998) certain activities have strict guidelines or are prohibited within CBAs and ESAs. Refer to the listed activities under the NEMA: Environmental Impact Assessment Regulations of 2014 (GNR 982) as promulgated in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) [as amended] for a comprehensive breakdown. The following terms are used to categorise the various land used types according to their biodiversity and environmental importance:

- Critical Biodiversity Area One (CBA1);
- Critical Biodiversity Area Two (CBA2);

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- Ecological Support Area (ESA);
- Other Natural Areas (ONA); and
- Protected Area (PA).

Based on the desktop information (Figure 8), the proposed site overlap with Critical Biodiversity area 2 The proposed property also falls on an ESA (see the Left bottom corner). The rest of the property is classified as other natural areas.

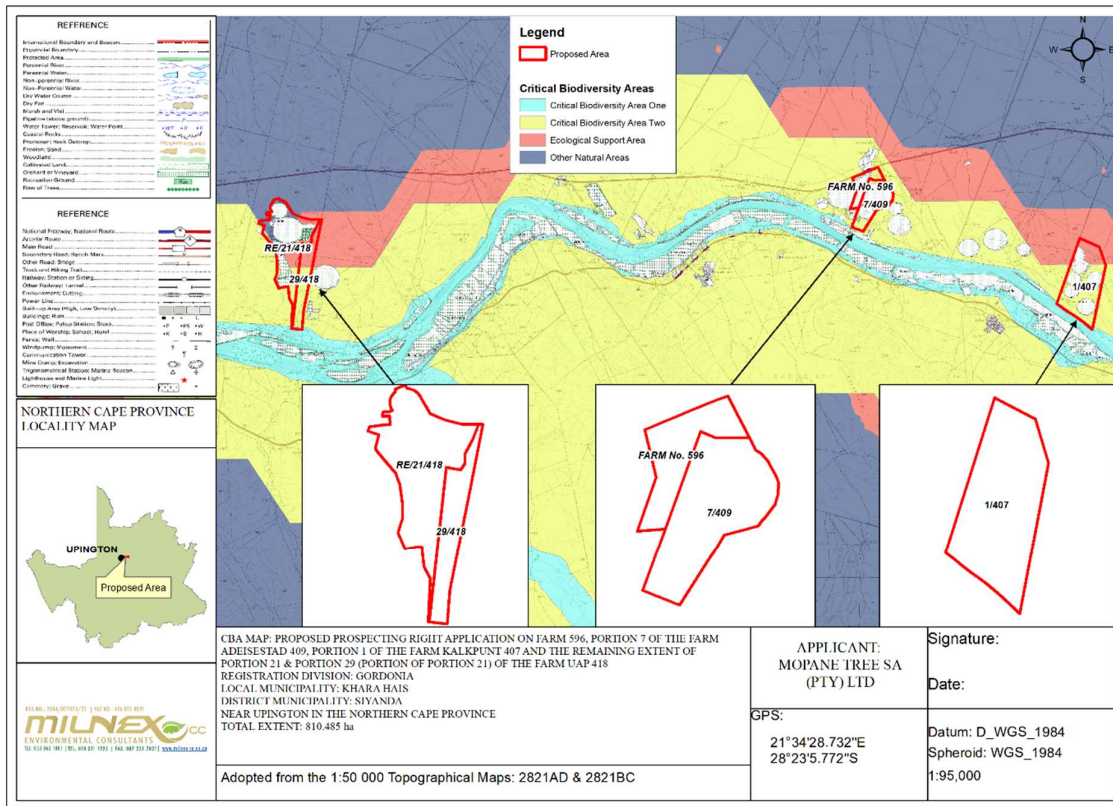
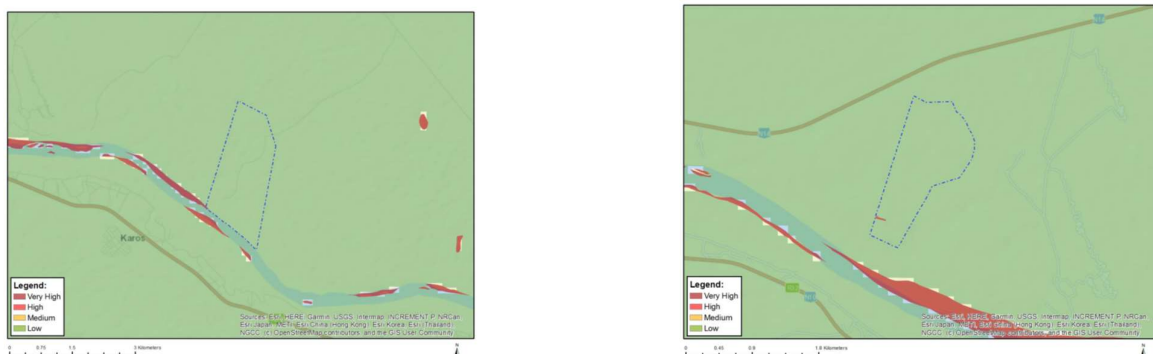


Figure 8: Critical Biodiversity Areas Map.

According to the DEA screening tool, the application area falls mostly within a low Aquatic Biodiversity with very small parts being classified as very high Combined Sensitivity area (see figure 9 below) Please see Appendix 7 for the colour map.



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According to the DEA Screening Tool the proposed area falls within a very High Terrestrial Biodiversity theme sensitivity with some evenly distributed low sensitive areas. Please see **Appendix 7** for the colour map.

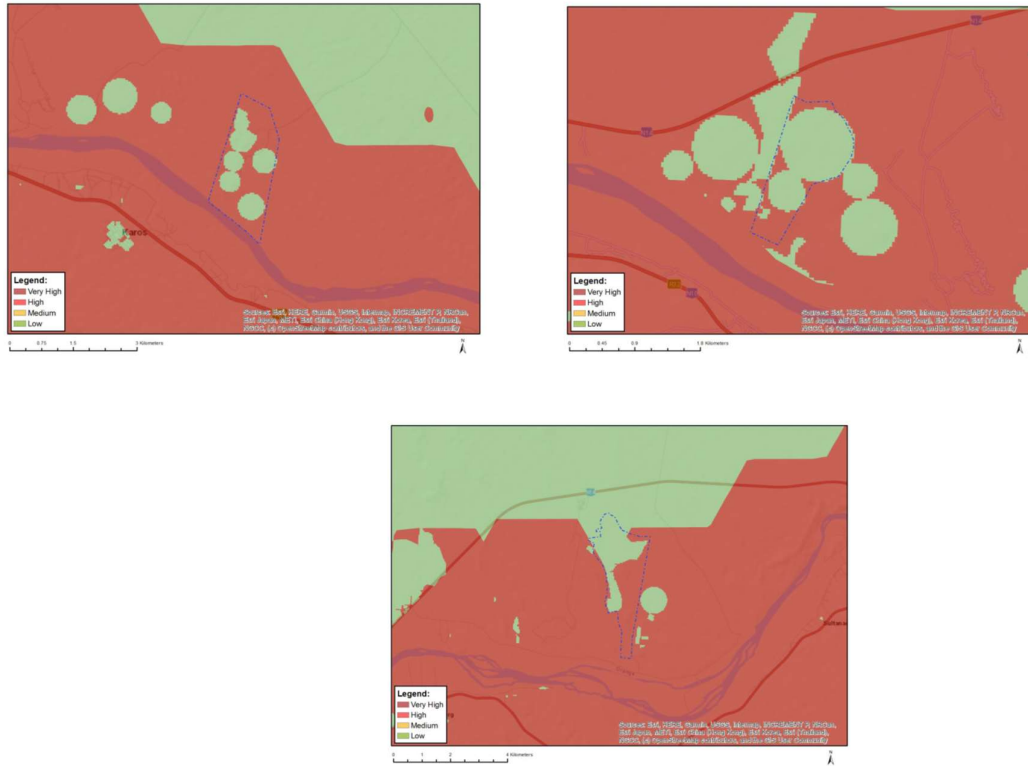
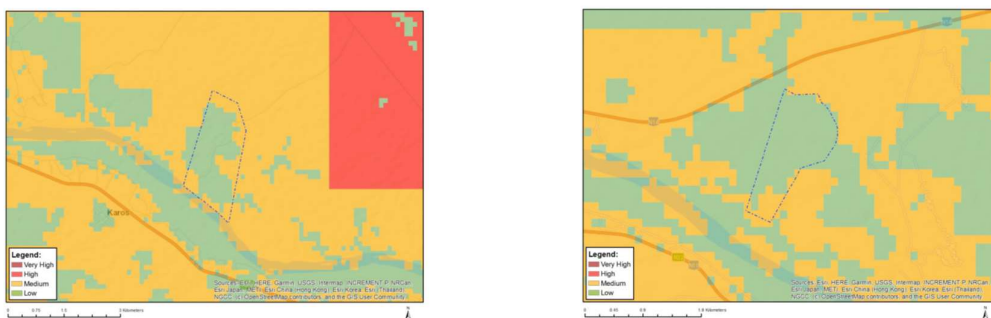


Figure 10: Terrestrial Biodiversity Combined Sensitivity

According to the DEA Screening Tool the portions mostly fall within low Animal Species theme sensitivity and a certain portions fall within a medium sensitive area. Please see **Appendix 7** for the colour map.



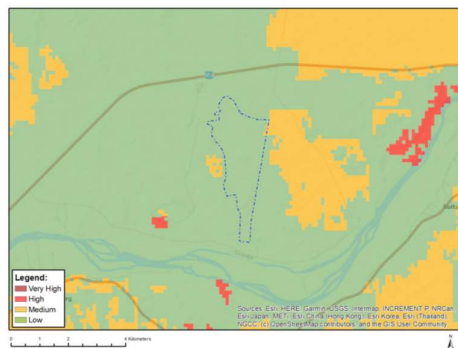


Figure 11: Animal Species theme sensitivity

Biodiversity Priority Areas for Mining

The Mining and Biodiversity Guideline was developed in 2013 for the purpose of mainstreaming biodiversity management practices into the mining sector (DEA, DMR, Chamber of Mines, SAMBF & SANBI 2013). This Guideline provides explicit direction in terms of where mining-related impacts are legally prohibited, where biodiversity priority areas may present high risks for mining projects, and where biodiversity may limit the potential for mining. The Guideline distinguishes between four categories of biodiversity priority areas in relation to their importance from a biodiversity and ecosystem service perspective as well as the implications for mining in these areas (Table 2).

Table 2: Four categories of biodiversity priority areas in relation to their biodiversity importance and implications for mining.

Category	Biodiversity Priority Areas	Risks for Mining	Implications for Mining
A. Legally Protected	<ul style="list-style-type: none"> Protected areas (including National Parks, Nature Reserves, World Heritage Sites, Protected Environments, Nature Reserves) Areas declared under Section 49 of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) 	Mining Prohibited	<p>Mining projects cannot commence as mining is legally prohibited. Although mining is prohibited in Protected Areas, it may be allowed in Protected Environments if both the Minister of Mineral Resources and Minister of Environmental Affairs approve it.</p> <p>In cases where mining activities were conducted lawfully in protected areas before Section 48 of the Protected Areas Act (No. 57 of 2003) came into effect, the Minister of Environmental Affairs may, after consulting with the Minister of Mineral Resources, allow such mining activities to continue, subject to prescribed conditions that reduce environmental impacts.</p>
B. Highest Biodiversity Importance	<ul style="list-style-type: none"> Critically endangered and endangered ecosystems Critical Biodiversity Areas (or equivalent areas) from provincial spatial biodiversity plans River and wetland Freshwater Ecosystem Priority Areas (FEPAs) and a 1km buffer around these FEPAs Ramsar Sites 	Highest Risk for Mining	<p>Environmental screening, environmental impact assessment (EIA) and their associated biodiversity specialist studies should focus on confirming the presence and significance of these biodiversity features, and to provide site-specific basis on which to apply the mitigation hierarchy to inform regulatory decision-making for mining, water use licences, and environmental authorisations.</p> <p>If they are confirmed, the likelihood of a fatal flaw for new mining projects is very high because of the significance of the biodiversity features in these areas and the associated ecosystem services. These areas are viewed</p>

			<p>as necessary to ensure protection of biodiversity, environmental sustainability, and human well-being.</p> <p>An EIA should include the strategic assessment of optimum, sustainable land use for an area and will determine the significance of the impact on biodiversity.</p> <p>This assessment should fully consider the environmental sensitivity of the area, the overall environmental and socio-economic costs and benefits of mining, as well as the potential strategic importance of the minerals to the country.</p> <p>Authorisations may well not be granted. If granted, the authorisation may set limits on allowed activities and impacts and may specify biodiversity offsets that would be written into licence agreements and/or authorisations.</p>
C. High Biodiversity Importance	<ul style="list-style-type: none"> • Protected area buffers (including buffers around National Parks, World Heritage Sites* and Nature Reserves) • Transfrontier Conservation Areas (remaining areas outside of formally proclaimed protected areas) • Other identified priorities from provincial spatial biodiversity plans • High water yield areas • Coastal Protection Zone • Estuarine functional zone <p>*Note that the status of buffer areas of World Heritage Sites is subject to a current intra-governmental process</p>	High Risk for Mining	<p>These areas are important for conserving biodiversity, for supporting or buffering other biodiversity priority areas, and for maintaining important ecosystem services for communities or the country.</p> <p>An EIA should include an assessment of optimum, sustainable land use for an area and will determine the significance of the impact on biodiversity.</p> <p>Mining options may be limited in these areas, and limitations for mining projects are possible.</p> <p>Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.</p>
D. Moderate Biodiversity Importance	<ul style="list-style-type: none"> • Ecological support areas • Vulnerable ecosystems • Focus areas for protected area expansion (land-based and offshore protection) 	Moderate Risk for Mining	<p>These areas are of moderate biodiversity value.</p> <p>EIAs and their associated specialist studies should focus on confirming the presence and significance of these biodiversity features, identifying features (e.g. threatened (land-based and offshore protection) species) not included in the existing datasets, and on providing site-specific information to guide the application of the mitigation hierarchy.</p> <p>Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.</p>

Based on **Figure 12**, the area does not overlap with any of the category's above.

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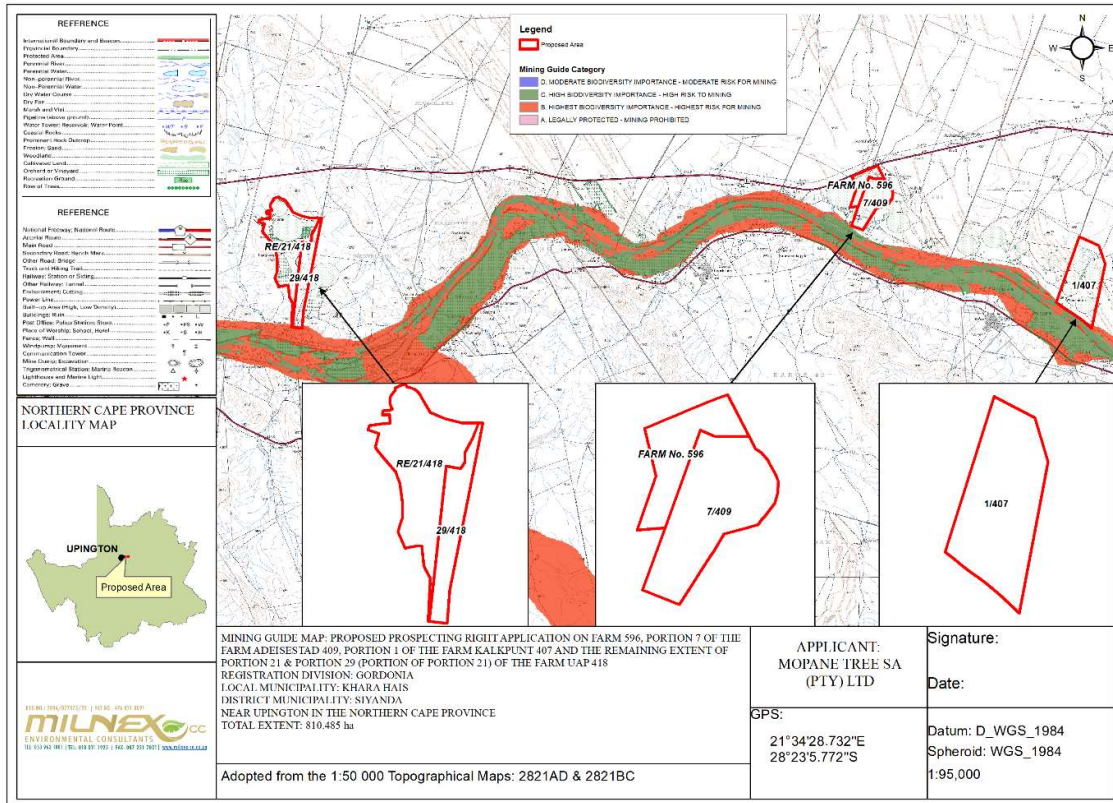


Figure 12: Biodiversity priority areas, in accordance with the Mining of Biodiversity Guidelines, associated with the study site.

Wetland Areas

In terms of Section 1 of the National Water Act (No. 36 of 1998) (NWA), wetlands are legally defined as: “land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil” (NWA 1998).

Wetlands are defined by the presence of unique soils and vegetation that do not occur in terrestrial and purely aquatic environments (Edwards *et al.* 2018). Wetland soils are referred to as hydric soils that develop under anaerobic conditions (condition where oxygen is virtually absent from the soil). Wetlands are also typically characterized by relatively large and dense stands of plants sticking out of shallow water or wet soil. Plants adapted to such waterlogged conditions are referred to as hydrophytes. Wetlands are distinct from true aquatic ecosystems like river ecosystems, which are characterized by fast flowing water within channels, and lake ecosystems, that are flooded to great depth; both of which are not primarily characterized by the occurrence of hydric soils and hydrophytes.

A wide variety of wetland types are present in South Africa, and can be classified into six broad types, namely floodplain wetlands, unchannelled valley bottom wetlands, channelled valley bottom wetlands, seeps, depressions and wetland flats. Owing to the large variations in climate and topography across South Africa, vegetation and habitat associated with these wetland types vary tremendously from subtropical reed beds and tall swamp forests to arid salt pans, which all support unique and varied animal life.

Figure 13 and Appendix 7 illustrates all wetland types associated with the study area. Some small pockets of wetlands have been identified on some portions

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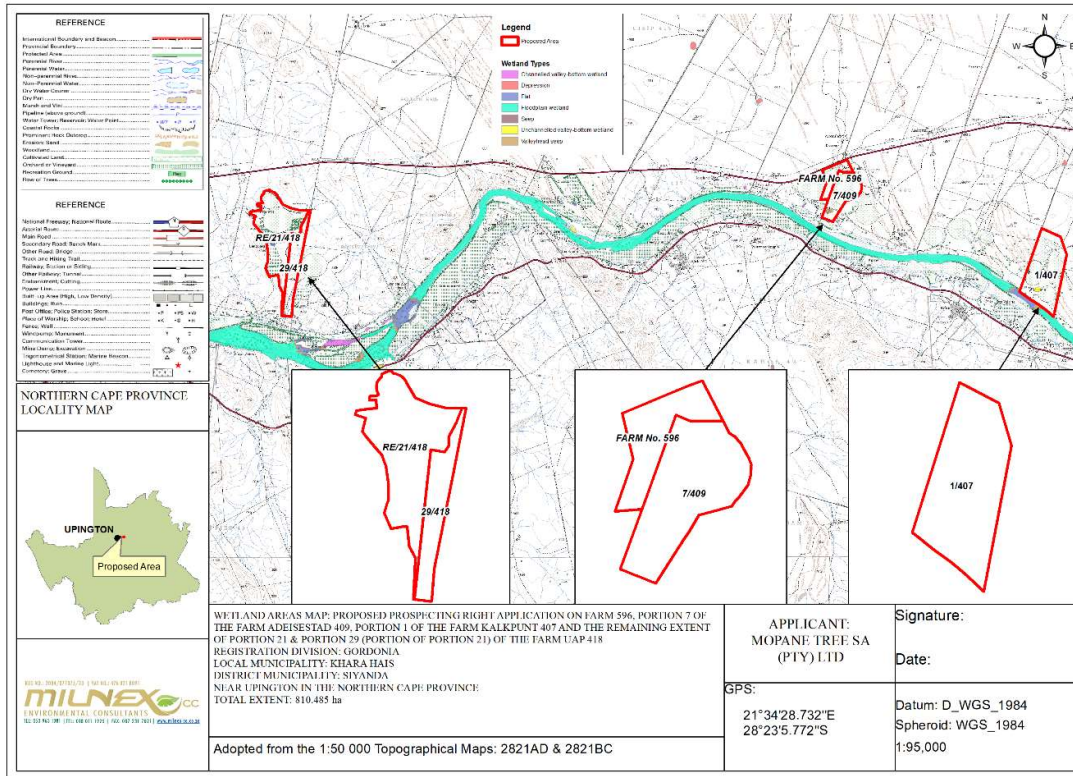


Figure 13 Wetland types located within or near the study site.

On the RE of Portion 21 of the Farm UAP 418 a small flat could be identified, on Portion 7 of the Farm Adeisestad 409 a small valleyhead seep wetland is present and on Portion 1 of the Farm Kalkpunt 407 a small unchannelled valley-bottom wetland is present

The Wetland vegetation that the site has been associated with is the Kalahari Duneveld & the Nama Karoo Bushmanland, as depicted in the figure below.

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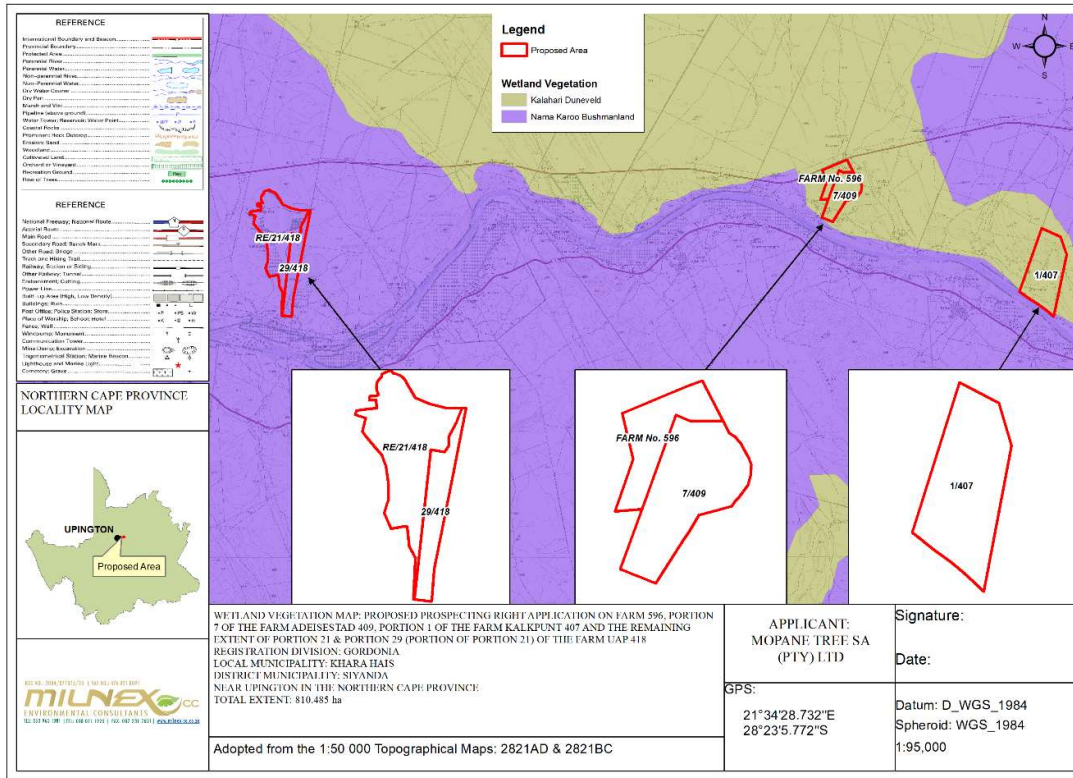


Figure 14: Wetland vegetation type

Important Bird and Biodiversity Areas

Important Bird and Biodiversity Areas (IBAs) are a network of sites that are significant for the long-term viability of naturally occurring bird populations (Birdlife 2019). Many sites are also important for other forms of biodiversity; therefore, the conservation of Important Bird & Biodiversity Areas ensures the survival of a correspondingly large number of other animals and plants.

No IBAs were identified within the vicinity of the study site (Figure 15).

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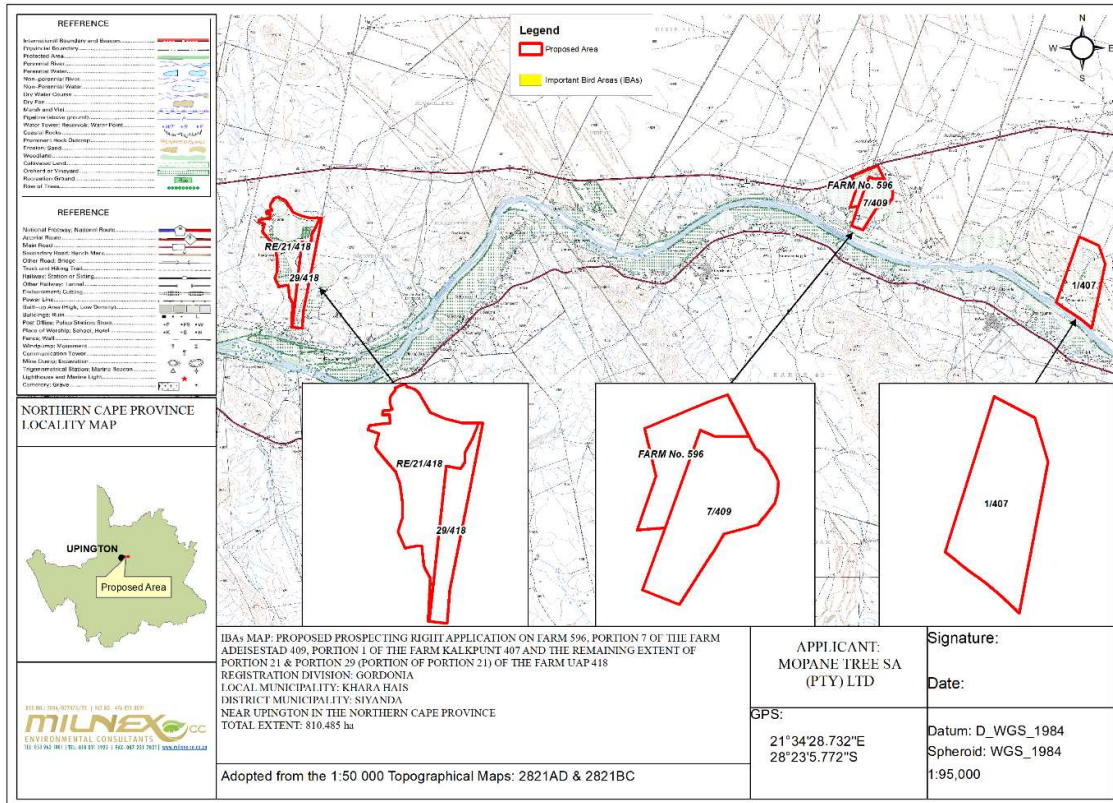


Figure 15: Important Bird and Biodiversity Areas associated with the study site.

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River Ecosystem Status

According to **Figure 16**, no rivers traverse the study area, but the Orange River flows south of the proposed portions. The Orange River's ecosystem status in this particular part is Class C: Moderately Modified.

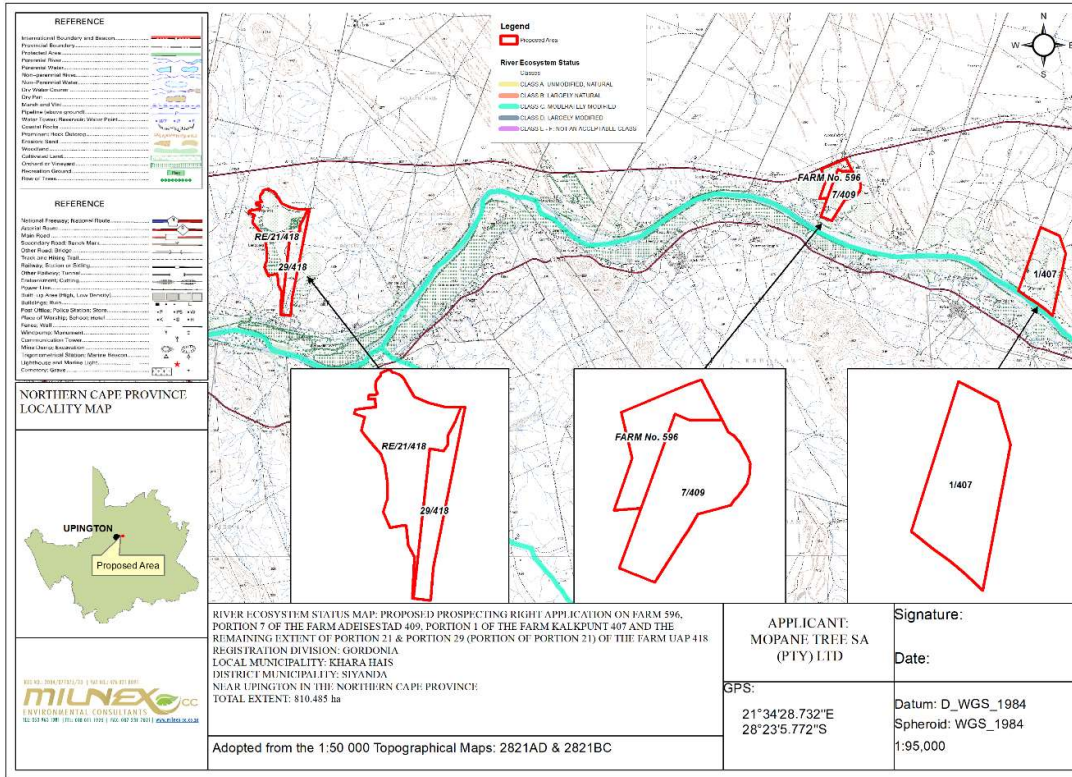
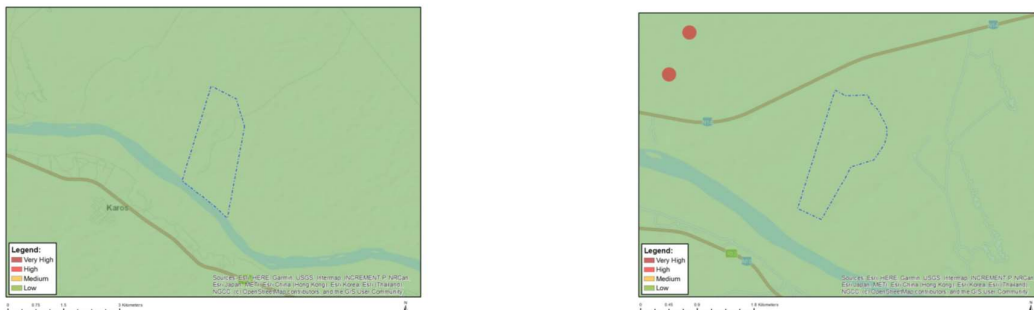


Figure 16: Ecosystem status of the rivers occurring in close proximity to the study site.

Archaeological and Cultural Heritage

According to the DEA screening tool, the application area falls within a low Archaeological and Cultural Heritage Combined Sensitivity area (see figure 17 below). See colour map in **Appendix 7**



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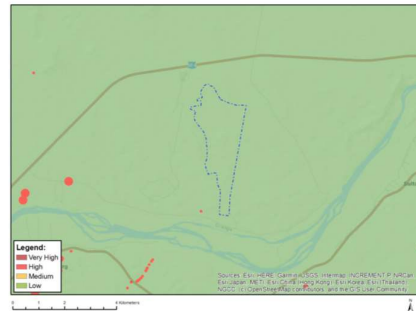


Figure 17: Archaeological and Cultural Heritage Combined Sensitivity

According to the Heritage Impact Assessment that was conducted, the following were identified:

On the Farm UAP, Stone Age chance finds were identified. **Description of finding:** A low scatter of stone tools mostly dating to the Middle Stone Age occur sporadically in limited numbers have been identified. The significance of the site is generally protected 4C with low significance and requires no further recording before destruction. This material is rated to have low significance due to their low numbers as well as the fact that it is surface material and is not in its primary context anymore. (refer to page 17 of the Attached HIA in **(Appendix 12)**).

On the Farm Adeisestad no material was identified.

On the Farm Kalkpunt Stone Age chance finds were identified. **Description of finding:** A low scatter of stone tools dating to the Middle Stone Age occur in the vicinity of stream beds. The tools are mostly classified as side- and end scrapers and are made from quartzite and banded iron stone. The significance of the site is generally protected 4C with low significance and requires no further recording before destruction. This material is rated to have low significance due to their low numbers as well as the fact that it is surface material and is not in its primary context anymore. (refer to page 18 of the Attached HIA in **(Appendix 12)**).

Later Stone Age dune sites were also identified on the Farm Kalkpunt. **Description of finding:** A scatter of stone tools dating to the Late Stone Age consisting of tools, flakes and cores. In addition, some small pieces of undecorated, thin-walled, coarse-grained pottery were identified on the site. The tools are mostly classified as side- and end scrapers and are made from and banded iron stone. Sites containing pottery are termed Ceramic LSA (CLSA) assemblages and in all probability can be linked with the Wilton Complex. The significance of the site is Generally protected 4A with High/medium significance and should be mitigated before destruction. This material is rated to have high significance due to the large numbers and the presence of pottery on the site (refer to page 19 of the Attached HIA in **(Appendix 12)**).

The impact of Heritage resources is further discussed under Section J of the Report. The mitigation measures have been included in the attached Environmental Management Programme as **Part B**.

Overall findings and recommendations of the Heritage Impact Report have been discussed in Section K of this Report

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According to the DEA Screening Report the portions fall within Low and Medium Theme Sensitivity. Please see map below, colour map under **Appendix 7**.

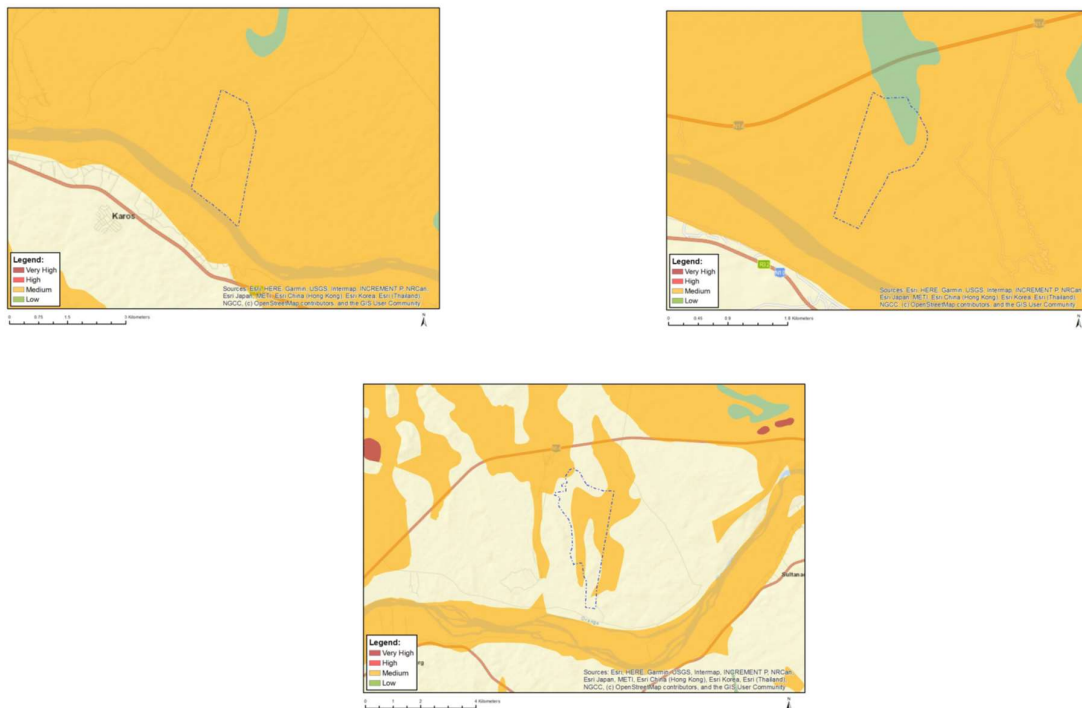


Figure 18: Palaeontology Combined Sensitivity

According to the Paleontological Desktop Assessment that was conducted and hereto attached as Appendix 12 The proposed development is underlain by sediments of the Gordonia Formation (Kalahari Group) as well as the Dagbreek Formation (Vaalkoppies Group, Namaqua-Natal Province). A Low Palaeontological Significance has been allocated to the proposed development and it is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction and operation of the project may be authorised, as the whole extent of the development footprint is not considered sensitive in terms of palaeontological heritage.

Description of the socio-economic environment

- **Socio-economic conditions**
- **Socio-economic conditions**

Khara Hais Local Municipality (Now known as Dawid Kruiper Local Municipality)

Dawid Kruiper Local Municipality is part of [ZF Mgcawu District Municipality](#).

The Dawid Kruiper Local Municipality is a Category B municipality that forms part of the ZF Mgcawu District in the Northern Cape. It borders with the Kgalagadi Transfrontier Park in the north, Botswana in the north-east, and Namibia in the west. It is the largest of five municipalities in the district, making up almost half its geographical area.

It was established by the amalgamation of the Mier and //Khara Hais Local Municipalities in August 2016. It consists of small towns and the !Khomani San community within its jurisdiction. Rietfontein, which is one of the main towns, is situated approximately 280km north-west from the nearest big town of Upington.

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Upington is situated 400km west of Kimberley, and has an airport and a landing strip. Natural boundaries provide a unique aspect to the town – one is the Kalahari Desert and another is the Orange River, South Africa's largest river, which it straddles.

The municipality is the acknowledged commercial, educational, military, agricultural, medical, transport and tourism centre of the area.

Main Economic Sectors: Agriculture, business services, game farming, tourism and hospitality, manufacturing, transport, community services, social and personal services.

Khara Hais Local Municipality (Now known as Dawid Kruiper Local Municipality)

Key Statistics Summary

Demographic Information

	2016	2011
Population	107 161	100 498
Age Structure		
Population under 15	28.6%	30.0%
Population 15 to 64	65.8%	64.4%
Population over 65	5.6%	5.7%
Dependency Ratio		
Per 100 (15-64)	52.1	55.3
Sex Ratio		
Males per 100 females	97.2	97.6
Population Growth		
Per annum	1.46%	n/a
Labour Market		
Unemployment rate (official)	n/a	n/a
Youth unemployment rate (official) 15-34	n/a	n/a
Education (aged 20 +)		
No schooling	4.5%	7.1%
Matric	31.8%	24.9%
Higher education	6.4%	7.3%

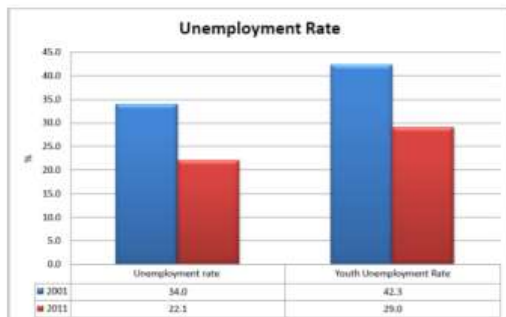
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Household Dynamics		
Households	28 704	25 028
Average household size	3.7	3.8
Female headed households	40.2%	39.7%
Formal dwellings	69.7%	76.3%
Housing owned	73.7%	54.3%
Household Services		
Flush toilet connected to sewerage	64.5%	66.3%
Weekly refuse removal	80.9%	84.6%
Piped water inside dwelling	50.4%	54.4%
Electricity for lighting	88.0%	89.9%

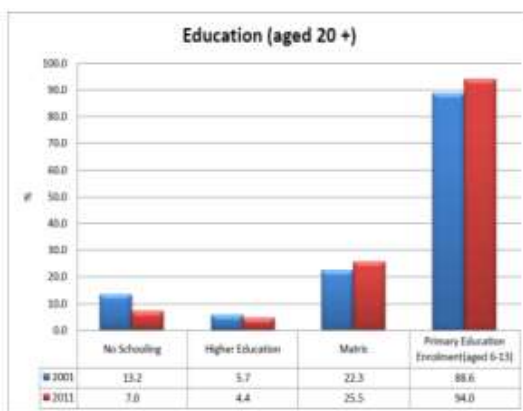
The chart above shows the population growth from 2011 to 2016 in the Khara Hais Local Municipality (Now known as Dawid Kruiper Local Municipality)

Unemployment Rate & Education

The unemployment rate decreases significantly from 34% in 2001 to 22.1% in 2011. There was a huge decline in the youth unemployment rate too from 42.3% in 2001 to 29% in 2011 but the youth unemployment rate is still very high in comparison with the overall unemployment rate of the municipality. Although about 44.7% of the Dawid Kruiper population are between 14 and 35 years old, youths remains relatively marginalised. See the chart below.



Source: Stats SA.



Source: Stats SA

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Populations Groups

The coloured population is in the majority, followed by Africans and then y the white population. The most commonly spoken language is Afrikaans, spoken by 85% of the residents as indicated below

GROUP	PERCENTAGE
Black African	23,1%
Coloured	65,2%
Indian/Asian	0,7%
White	9,9%
Other	1,2%

Languages

The table below shows that Afrikaans is the most dominant language in Dawid Kruiper with 85.2% of the population indicating that this was the language most often spoken in the home. This is followed by IsiXhosa at 5% and Setswana at 3.5%.

LANGUAGE	PERCENTAGE
Afrikaans	85,2%
English	1,9%
IsiNdebele	0,2%
IsiXhosa	5%
IsiZulu	0,3%
Sepedi	0,2%
Sesotho	0,9%
Setswana	3,5%
Sign Language	0,3%
SiSwati	0%
Tshivenda	0,1%
Xitsonga	0%
Other	0,8%
Not Applicable	1,5%

Land capability

The National Department of Agriculture (2006) classified land capability into two broad categories, namely land suited to cultivation (Classes I – IV) and land with limited use, generally not suited to cultivation (Classes V – VIII). The site falls within Class VII and therefore the agricultural potential of the site is limited and it is unlikely that the change in land use will impact significantly on agricultural production (AGIS, 2016).

Refer to Land capability map attached as **Appendix 5 & figure 19 below.**

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Figure 20: Agriculture Combined Sensitivity

(b) Description of the current land uses.

The site is largely covered by cultivated lands, low Schrubland areas, non vegetated areas & ticket/dense bush. All infrastructure will be temporary and/or mobile.

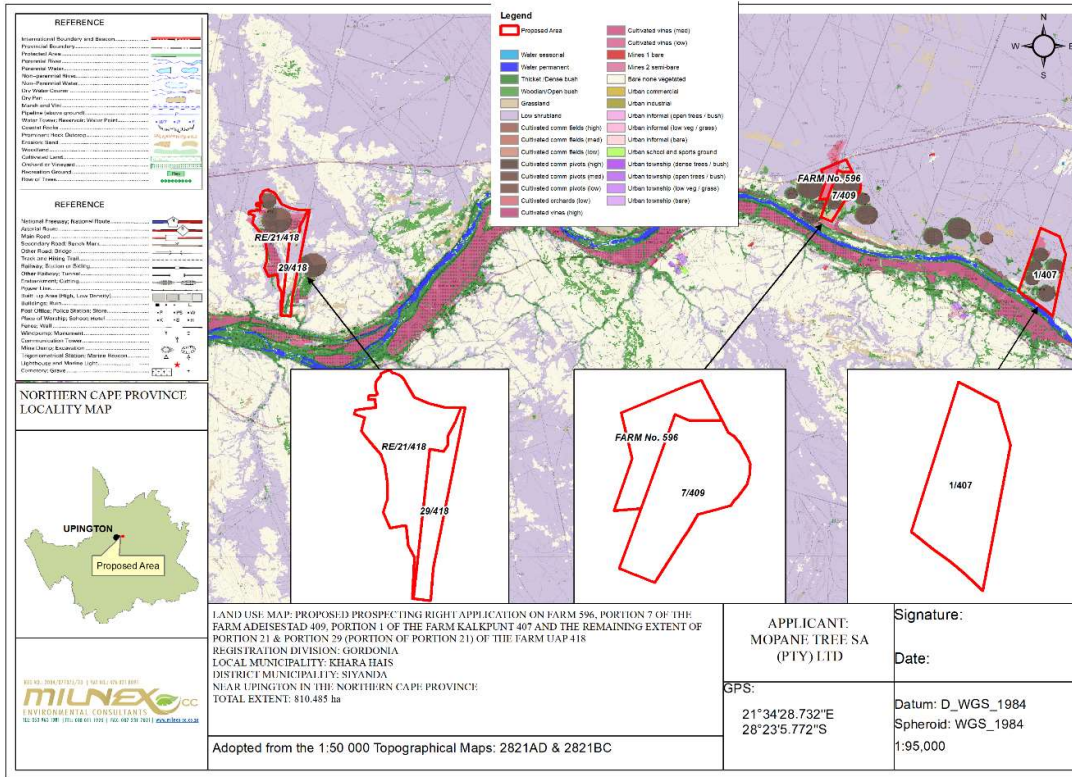


Figure 21: Current Land Use associated with study site and surrounding areas.

v) The 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;

Please go to heading J) **AN ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK**, for the impacts identified and their assessment.

vi) the 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		
<p>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:</p> <p>(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.</p> <p>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.</p>		
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) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;

- Increased ambient noise levels resulting from surveys, 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.
- 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 cattle movement, breeding and grazing practices.
- Access control to portion which may impact on cattle movement, breeding and grazing practices of the surrounding community.
- 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.
- Negative impacts on the groundwater resources.
- Longterm loss of indigenous vegetation.
- Air pollution due to dust
- Impact on tourism.
- Impacts on Heritage & Paleontological features

viii) the possible mitigation measures that could be applied and level of residual risk;

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(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).

Adverse environmental associated with the prospecting activity have been identified through the Scoping & EIR process. Mitigation measures as set out in the Environmental Management Programme (EMPr) attached in Part B must be implemented in order to minimise any potential impacts.

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

ix) if no alternative development [location] footprints for the activity were investigated, the motivation for not considering such; and

As discussed in the previous section, based on outcomes of previous studies in the vicinity of the proposed site, the possibility to encounter high volumes of Diamonds (Alluvial, General & in Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province, are expected.

x) a concluding statement indicating the location of the preferred alternative development [location] footprint within the approved site as contemplated in the accepted scoping report;
(Provide a statement motivating the final site layout that is proposed)

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

I. A FULL DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS THE ACTIVITY AND ASSOCIATED STRUCTURES AND INFRASTRUCTURE 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, INCLUDING—.)

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

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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	×			Some wetlands are present
II. A conservation or open space area		×		No
III. An area that is of cultural importance		×		According to the DEA Screening Report the area falls within a low Archaeological and Cultural Heritage Theme Sensitivity (Appendix 7). Also refer to Appendix 12 for the full HIA Report
IV. Site of geological significance		×		According to the DEA Screening Report the portions fall within Low & Medium Paleontology Theme Sensitivity (Appendix 7). Also refer to Appendix 12 for the full PDA Report.
V. Areas of outstanding natural beauty		×		No
VI. Highly productive agricultural land			×	According to the Land Capability map the proposed area falls within land capability Class 7 (Appendix 5). Some of the areas also consist of agricultural lands
VII. Floodplain		×		No floodplain identified within the study area
VIII. Indigenous forest			×	According to the land use map certain areas is covered in Woodland/Tickets (Appendix 7).
IX. Grass land			×	According to the land use map certain areas is covered in low shrubland (Appendix 7).
X. Bird nesting sites		×		According to the Important Bird Areas map (Appendix 7) the proposed area does not fall within an Important Bird Area (IBAs).
XI. Red data species			×	According to the CBA map the portions fall within a CBA 2 area, Ecological Support areas & other natural areas (Appendix 7). According to the screening tool (Appendix 7) the animal & plant sensitivity theme range from medium to low, respectively
XII. Tourist resort		×		
2. Will the project potentially result in potential?				
I. Removal of people		×		None.

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II. Visual Impacts	×			Visual impacts will be managed.
III. Noise pollution	×			The noise impact will be limited to working hours.
IV. Construction of an access road		×		Access will be obtained from existing gravel roads off the N14 were no road exist, roads may be created.
V. Risk to human or valuable ecosystems due to explosion/fire/ discharge of waste into water or air.		×		None.
VI. Accumulation of large workforce (>50 manual workers) into the site.		×		Approximately 15 employment opportunities will be created during the construction and operational phase of the project.
VII. Utilisation of significant volumes of local raw materials such as water, wood etc.		×		The application area will use 2 x 16 feet washing pans, the amount of water for the pans will be 34 000 L/hour from which 30% is re-used.
VIII. Job creation	×			Approximately 15 employment opportunities will be created during the construction and operational phase of the project.
IX. Traffic generation		×		None.
X. Soil erosion	×			Only areas earmarked for mining will be cleared. prospecting will be phased and the topsoil stockpiled separately. Concurrent rehabilitation will take place.
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	×			The Orange River flows south of the proposed area
II. A conservation or open space area		×		No
III. An area that is of cultural importance			×	
IV. A site of geological significance			×	
V. An area of outstanding natural beauty			×	
VI. Highly productive agricultural land			×	
VII. A tourist resort		×		
VIII. A formal or informal settlement		×		

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:

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- **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.

ii) An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;

MATRIX ANALYSIS

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									
<p>Listing Notice 1, GNR 327, Activity 24: "The development of a road – with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres"</p> <p>Listing Notice 1 (GNR 327), Activity 27: "The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation"</p> <p>Listing Notice 3 (GNR 324), Activity 12(g) (ii): The clearance of an area of 300 square metres or more of indigenous vegetation (g) Northern Cape (ii) Within critical biodiversity areas identified in bioregional plans</p>	<p>Site clearing and preparation Areas earmarked for prospecting will need to be cleared, topsoil will be stockpiled separately.</p>	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. 		-	S	Yes	-
			Air	<ul style="list-style-type: none"> Air pollution due to the increase of traffic. Dust from mining/prospecting activities 	-		M	Yes	-
			Soil	<ul style="list-style-type: none"> Soil degradation, including erosion. Loss of topsoil. Disturbance of soils and existing land use (soil compaction). 	-	-	S	Yes	-
			Geology	<ul style="list-style-type: none"> It is not foreseen that the removal of indigenous vegetation will impact on the geology or vice versa. 	-		S	Yes	-
			Existing services infrastructure	<ul style="list-style-type: none"> Generation of waste that need to be accommodated at a licensed landfill site. Generation of sewage that need to be accommodated by the local sewage plant. 	-		S	Yes	-
			Ground water	<ul style="list-style-type: none"> Pollution due to construction vehicles. 	-		S	Yes	-
			Surface water	<ul style="list-style-type: none"> Increase in storm water run-off. Pollution of water sources due to soil erosion. Destruction of watercourses (pans/dams/streams). 		-	S	Yes	-
		SOCIAL/ECONOMIC ENVIRONMENT	Local unemployment rate	<ul style="list-style-type: none"> Job creation. Business opportunities. Skills development. 		+	S	Yes	-
			Visual landscape	<ul style="list-style-type: none"> Potential visual impact on residents of farmsteads and motorists in close proximity to proposed facility. 	-		L	Yes	-
			Traffic volumes	<ul style="list-style-type: none"> Increase in construction vehicles. 	-		S	Yes	-
			Health & Safety	<ul style="list-style-type: none"> Air/dust pollution. Road safety. Increased risk of veld fires. 		-	S	Yes	-
			Noise levels	<ul style="list-style-type: none"> The generation of noise as a result of construction vehicles, the use of machinery such as drills, excavators, dumper trucks and people working on the site. 	-		L	Yes	-
			Tourism industry	<ul style="list-style-type: none"> Since there are no tourism facilities in close proximity to the site, the construction activities will not have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	N/A

			Heritage resources	<ul style="list-style-type: none"> Impact with mitigation in Low 	-		L	Yes	Appendix 12	
OPERATIONAL PHASE										
<p>Listing Notice 1 (GNR 327), Activity 19: <i>The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from:</i> (ii) a watercourse;</p> <p>Listing Notice 1 (GNR 327), Activity 20: <i>“Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— (a) associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource; or [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)] (b) the primary processing of a petroleum resource including winning, extraction, classifying, concentrating or water removal; –</i></p> <p>Listing Notice 2 (GNR 325), Activity 19: <i>“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;</i></p> <p>NEM:WA 59 of 2008: Residue stockpiles or residue deposits, Category A: (15) <i>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).</i></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 as far as possible obtained from existing roads on the proposed portion. 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 / prospecting activity and transport of the gravel to the designated areas. 	-		S	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 - medium significance relative to agricultural potential of the site). 	-		L	Yes	-	
			Geology	<ul style="list-style-type: none"> Collapsible soil. Seepage (shallow water table). Active soil (high soil heave). Erodible soil. The presence of undermined ground. Instability due to soluble rock. Steep slopes or areas of unstable natural slopes. Areas subject to seismic activity. Areas subject to flooding. 			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, dust suppression. 	-		L	Yes	-	
			Ground water	<ul style="list-style-type: none"> Leakage of hazardous materials. The machinery on site require oils and fuel to function. Leakage of these oils and fuels can contaminate water supplies. 	-		L	Yes	-	
			Surface water	<ul style="list-style-type: none"> Increase in storm water runoff. The development will potentially result in an increase in storm water run-off that needs to be managed to prevent soil erosion. Destruction of watercourses (pans/dams/streams). 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. Skills development. 	-		L	Yes	-
				Visual landscape	<ul style="list-style-type: none"> The proposed portions are used for livestock grazing and crop production 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 tourism facilities in close proximity to the site, the decommissioning activities may have an impact on tourism in the area. 	N/A	N/A	N/A	N/A	-
			Heritage resources	<ul style="list-style-type: none"> Impact with mitigation in Low 	-		L	Yes	Appendix 12
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. 		-	L	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. 	N/A	N/A	N/A	N/A	-			

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

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

- (i) cumulative impacts;
- (ii) the nature, significance and consequences of the impact and risk;
- (iii) the extent and duration of the impact and risk;
- (iv) the probability of the impact and risk occurring;
- (v) the degree to which the impact and risk can be reversed;
- (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and
- (vii) the degree to which the impact and risk can be mitigated;

Significance of potential impacts

The following sections present the outcome of the significance rating exercise. The results suggest that almost none of the key issues identified as part of the EIR process had a negative high environmental significance. Instead the overall score indicate a medium to low environmental significance score.

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, loss of topsoil, 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 above mentioned impacts are discussed in more detail below:

Loss or fragmentation of indigenous natural fauna and flora:

The proposed area falls within the following vegetation units

SVkd 1 Gordonia Duneveld Vegetation Unit:

Conservation Least threatened. Target 16%. Some 14% statutorily conserved in the Kgalagadi Transfrontier Park. Very little transformed. Generally low erosion, but some areas with spectacular destabilisation of normally vegetated dunes (through local overstocking) favoured by photographers. Erosion is normally very low.

AZa 3 Lower Gariep Alluvial Vegetation Unit

Conservation Endangered. Target 31%. About 6% statutorily conserved in the Richtersveld and Augrabies Falls National Parks. Some 50% transformed for agricultural purposes (vegetables and grapes) or alluvial diamond mining. *Prosopis* species, *Nicotianaglauca* and *Argemone ochroleuca* can invade the alluvia in places.

NKb 5 Kalahari Karroid Shrubland

Conservation Least threatened. Target 21%. Very little statutorily conserved in Augrabies Falls National Park. Although only a small area has been transformed many of the belts of this type were preferred routes for early roads, thus promoting the introduction of alien plants (about a quarter of the unit has scattered *Prosopis* species). Erosion is very low (94%).

Loss or fragmentation of indigenous natural fauna and flora	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Medium (2)
Magnitude	High (3)	Medium (2)
Reversibility	Irreversible (4)	Partly reversible (2)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	High cumulative impacts (4)	
Significance	Negative high impact (57)	Negative medium (45)

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; • 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 or fragmentation of habitats –

Loss or fragmentation of habitats	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Medium (2)
Magnitude	High (3)	Medium (2)
Reversibility	Barely reversible (3)	Completely reversible (1)
Irreplaceable loss of resources	Significant loss of resource (3)	Marginal loss of resource (2)
Cumulative impact	Medium cumulative impacts (3),	
Significance	Negative high impact (51)	Negative low (26)
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.

Loss of topsoil	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	Permanent (4)	Medium term (2)
Magnitude	High (3)	Low (1)
Reversibility	Barely reversible (3)	Completely reversible (1)

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Irreplaceable loss of resources	Significant (3)	Marginal (2)
Cumulative impact	Medium cumulative impact (3).	
Significance	Negative High (51)	Negative low (10)
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 EMPr also provide mitigation measures related to topsoil management.</p>	

- 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. The erosion risk is low due to the low slope gradients and low to moderate erodibility of the soils.

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	Permanent (4)	Medium term (2)
Magnitude	High (3)	Low (1)
Reversibility	Barely reversible (3)	Completely reversible (1)
Irreplaceable loss of resources	Significant (3)	Marginal (2)
Cumulative impact	Medium cumulative impact (3).	
Significance	Negative High (51)	Negative low (10)
Can impacts be mitigated?	The following mitigation or management measures are provided: Implement an effective system of run-off control, where it is required,	

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

Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Possible (2)
Duration	Short term (1)	Short term (1)
Magnitude	Medium (2)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	The impact would result in negligible to no cumulative effects (1).	
Significance	Negative low (18)	Negative low (8)
Can impacts be mitigated?	Yes, management actions related to noise pollution are included in section (f) of the EMPr.	

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

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local/district (2)	Local/district (2)
Probability	Definite (4)	Definite (4)
Duration	Short term (1)	Short term (1)
Magnitude	Low (1)	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 impact (2) - An additional demand for landfill space could result in low significant cumulative impacts if services become unstable or unavailable, which in turn would negatively impact on the local community.	
Significance	Negative low (12)	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 EMPr are implemented.	

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- Impacts on heritage objects

7.1.1 & 7.3.1 Change Finds		
Impact assessment		
Although this material is found inside the project area, their low significance as well as the fact that the area has already extensively been disturbed due to it being surface material, the impact is viewed to be very low.		
	Without mitigation	With mitigation
Extent	Local area (1)	Local area (1)
Duration	Permanent (5)	Permanent (5)
Intensity	Low (1)	Low (1)
Probability	Improbable (2)	Improbable (2)
Significance	Low (14)	Low (14)
Status (positive or negative)	Negative	Neutral
Reversibility	Non-reversible	Non-reversible
Irreplaceable loss of resources?	No	No
Can impacts be mitigated	None	
Mitigation: None		
Cumulative impact: Very limited loss of similar features in the larger landscape.		

7.3.2 Later Stone Age dune site		
Impact assessment		
Although the prospecting plan for this area is not available, it is anticipated that it might impact on this site		
	Without mitigation	With mitigation
Extent	Site (1)	Site (1)
Duration	Permanent (5)	Permanent (5)
Intensity	Moderate (6)	Minor (2)
Probability	Probable (3)	Probable (3)
Significance	Low (36)	Low (24)
Status (positive or negative)	Negative	Positive
Reversibility	n/a	n/a
Irreplaceable loss of resources?	Yes	No
Can impacts be mitigated	Yes	

Mitigation measures include:

<i>Mitigation: means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible.</i>
7.1.1 & 7.3.1 Chance find Stone Age material.
Mitigation
(5) No further action required: This is applicable only where sites or features have been rated to be of such low significance that it does not warrant further documentation, as it is viewed to be fully documented after inclusion in this report.
Requirements: None

7.3.2 Red dune site
Mitigation

(1) Avoidance/Preserve: This is viewed to be the primary form of mitigation and applies where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources.

Archaeological investigation: This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated. Mitigation is to document the site (Map and photograph) and analyse the recovered material to acceptable standards.

This option should be implemented when it is possible to avoid impacting on an identified site or feature.

Requirements: In the event of an impact occurring on the identified site or feature, a permit for mitigation and/or destruction must be obtained from SAHRA/PHRA prior to any work being carried out.

- Impacts on paleontological features

Generation of waste	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Definite (4)	Possible (2)
Duration	Permanent (4)	Permanent (4)
Magnitude	High (3)	Low (1)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Complete loss of resource (4)	Complete loss of resources (4)
Cumulative impact	Low cumulative impact (2) - An additional demand for landfill space could result in low significant cumulative impacts if services become unstable or unavailable, which in turn would negatively impact on the local community.	
Significance	Negative High (57)	Negative low (17)
Can impacts be mitigated?	<p>If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a palaeontologist.</p> <p>It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.</p>	

Loss of fossil heritage will be a negative impact. Only the site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent to long term. In the absence of mitigation procedures, the damage or destruction of any palaeontological materials will be permanent. Impacts on palaeontological heritage during the construction phase could potentially occur and are regarded as having a high probability. As fossil heritage will be destroyed the impact is irreversible. The significance of the impact occurring will be high pre-mitigation and low post-mitigation.

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

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obtained from existing tar and gravel roads. While the volume of traffic along this road is low, the movement of heavy vehicles along this road is likely to damage the road surface and impact on other road users. The contractor should be required to ensure that damage to the road is repaired periodically. The movement of additional heavy vehicle traffic will add significantly to the current traffic load on the road. The impact on the roads is therefore likely to be moderate.

Increase in vehicle traffic	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Short term (1)	Short term (1)
Magnitude	High (3)	Medium (2)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Medium cumulative impact (3). If damage to roads is not repaired then this will affect the farming activities in the area and result in higher maintenance costs for vehicles of local farmers and other road users. The costs will be borne by road users who were no responsible for the damage.	
Significance	Negative medium impacts (33)	Negative low (11)
Can impacts be mitigated?	<p>The potential impacts associated with heavy vehicles can be effectively mitigated. The mitigation measures include:</p> <ul style="list-style-type: none"> The contractor must ensure that damage caused by construction on the roads are 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 EMPr. For mitigation measures related to traffic.</p>	

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

Risk to safety, livestock and farm infrastructure	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Medium term (2)	Medium term (2)
Magnitude	Very High (4)	Medium (2)
Reversibility	Barely reversible (3)	Partly reversible (2)
Irreplaceable loss of resources	Significant resource (3)	Marginal resource (2)
Cumulative impact	Medium cumulative effects (3), provided losses are compensated for.	
Significance	Negative High (64)	Negative low (28)
Can impacts be mitigated?	<p>Key mitigation measures include:</p> <ul style="list-style-type: none"> Mopane Tree (SA) 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; 	

	<ul style="list-style-type: none"> • 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 Mopane Tree (SA) 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; • Mopane Tree (SA) 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 Mopane Tree (SA) 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 Mopane Tree (SA) 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).
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- Increased risk of veld fires - The presence of construction workers and construction-related activities on the site poses an increased risk of grass fires that could in turn pose a threat to livestock and farmsteads in the area. In the process, farm infrastructure may also be damaged or destroyed and human lives threatened. The potential risk of grass fires was heightened by the windy conditions in the area, especially during the dry, windy winter months from May to October. In terms of potential mitigation measures, a fire-break should be constructed around the perimeter of the site prior to the commencement of the construction phase. In addition, fire-fighting equipment should be provided on site during the construction phase.

Increased risk of veld fires	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Region (3)	Local (2)
Probability	Probable (3)	Probable (3)
Duration	Medium term (2)	Short term (1)
Magnitude	High (3)	Low (1)
Reversibility	Completely reversible (1)	Completely reversible (1)
Irreplaceable loss of resources	No loss of resource (1)	No loss of resource (1)
Cumulative impact	Negligible cumulative effects (1), provided losses are compensated for.	
Significance	Negative medium (33)	Negative low (9)
Can impacts be mitigated?	The mitigation measures include: <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; 	

	<ul style="list-style-type: none"> • 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.
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OPERATIONAL PHASE

Direct impacts: During the operational phase the study area will serve as an prospecting area and the impacts are generally associated with soil erosion, change in land use, impacts associated with the, increase in storm water runoff, increased consumption of water, visual intrusion, the generation of general waste, leakage of hazardous materials, and the change in the sense of place. The operational phase will also have a direct positive impact through the provision of temporary employment opportunities and facilitating a positive economic growth. The above mentioned impacts are discussed in more detail below:

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

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

- Change in land-use – The use of the area for the operation of the prospecting activity will not disturb any agricultural activities on most of the portions as both will be done concurrently.

Change in land use	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative

Milnex CC: EIA506PR – EIR & EMPr: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

Extent	Local (2)	Local (2)
Probability	Possible (2)	Possible (2)
Duration	Medium term (2)	medium term (2)
Magnitude	Medium (2)	Medium (2)
Reversibility	Partly reversible (2)	Completely reversible (1)
Irreplaceable loss of resources	Marginal loss of resource (2)	No loss of resource (1)
Cumulative impact	Low cumulative impacts (3).	
Significance	Negative low (24)	Negative low (20)
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 EMPr.</p>	

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

Increase in storm water runoff	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Probable (3)	Unlikely (1)
Duration	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 impact (3) - Should these impacts occur, there will be a cumulative impacts on the wider area.	
Significance	Negative medium (30)	Negative low (13)
Can impacts be mitigated?	<p>Yes. It is therefore important that all management actions and mitigation measures included in section (f) of the EMPr. are implemented to ensure that these impacts do not occur</p> <p>The cut-off trenches and silt fences will be installed where necessary as to control runoff storm water by attenuating it and control the movement of sediment on the premises.</p> <p>These structures will be monitored on a regular basis. It is suggested that it be monitored on a weekly basis during the rainy season, and after possible rain events during the dry season.</p> <p>If these practices is found to be insufficient for the control of storm water and sedimentation, other alternatives should immediately be investigated and implemented.</p>	

Increased consumption of water – Since in it is maybe anticipated that 2 x 16 feet washing pans will be used, the amount of water for the pans will be 34 000 L/hour from which 30% is re-used.

Increased consumption of water	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Region (3)	Region (3)

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Probability	Definite (4)	Definite (4)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	Medium (2)
Reversibility	Irreversible (4)	Irreversible (4)
Irreplaceable loss of resources	Significant loss of resources (3)	Marginal loss of resources (2)
Cumulative impact	High cumulative impacts (4) - An additional demand on water sources could result in a significant cumulative impact with regards to the availability of water.	
Significance	Negative high impact (63)	Negative medium (40)
Can impacts be mitigated?	Yes, management actions and mitigation measures related to the use of water are included in section (f) of the EMPr.	

- 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 EMPr.	

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

Leakage of hazardous materials	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Possible (2)	Unlikely (1)
Duration	Long term (3)	Long term (3)
Magnitude	High (3)	Medium (2)
Reversibility	Partly reversible (2)	Partly reversible (2)
Irreplaceable loss of resources	Marginal loss of resource (2)	Marginal loss of resource (2)
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	
Significance	Negative medium (36)	Negative low (22)
Can impacts be mitigated?	Yes. It is therefore important that all management actions and mitigation measures included in the section (f) of EMPr 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 back actors, rotary pans and people working on the site, as well as occasional blasting. The noise impact is likely to be significant as the closest

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Temporary noise disturbance	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Local (2)	Local (2)
Probability	Definite (4)	Probable (3)
Duration	Medium term (2)	Medium term (2)
Magnitude	Very high (4)	High (3)
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 medium cumulative effects (3).	
Significance	Negative High (52)	Negative medium (36)
Can impacts be mitigated?	Yes, management actions related to noise pollution are included in section (f) of the EMPr.	

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 the sense of place – The impact of the proposed prospecting of diamond (alluvial, in Kimberlite & General) on the areas sense of place with mitigation is likely to be medium. In addition, the site will be visible from the existing tar and gravel roads.

Potential impacts on sense of place	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Negative	Negative
Extent	Site (1)	Site (1)
Probability	Possible (2)	Possible (2)
Duration	Medium term (2)	Medium term (2)
Magnitude	High (3)	High (3)
Reversibility	Barely reversible (3)	Barely reversible (3)
Irreplaceable loss of resources	Marginal loss of resources (2)	Marginal loss of resources (2)
Cumulative impact	Medium cumulative impacts (3)	
Significance	Negative high (39)	Negative high (39)
Can impacts be mitigated?	No mitigation required	

DECOMMISSIONING PHASE (MINE CLOSURE AND REHABILITATION)

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

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

Rehabilitation of the physical environment	Pre-mitigation impact rating	Post mitigation impact rating
Status (positive or negative)	Positive	Positive
Extent	Site (1)	Site (1)
Probability	Possible (2)	Probable (3)
Duration	Long term (3)	Long term (3)
Magnitude	Low (1)	Medium (2)
Reversibility	N/A	N/A
Irreplaceable loss of resources	N/A	N/A
Cumulative impact	The impact would result in negligible to no cumulative effects (1)	
Significance	Positive low (7)	Positive low (16)
Can impacts be mitigated?	No mitigation measures required.	

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- 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?	<p>The following mitigation measures are recommended:</p> <ul style="list-style-type: none"> • All structures and infrastructure associated with the proposed facility should be dismantled and transported off-site on decommissioning; • Mopane Tree SA (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.

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K. SUMMARY OF THE FINDINGS AND RECOMMENDATIONS OF ANY SPECIALIST REPORT

(where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report):-

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.
Heritage Impact Assessment	<p>This report describes the methodology used, the limitations encountered, the heritage features that were identified and the recommendations and mitigation measures proposed relevant to this. The HIA consisted of a desktop study (archival sources, database survey, maps and aerial imagery) and a physical survey that included the interviewing of relevant people. It should be noted that the implementation of the mitigation measures is subject to SAHRA/PHRA's approval.</p> <p>The cultural landscape qualities of the larger region essentially consist of two components. The first is a rural area in which the human occupation is made up of a pre-colonial element (Stone Age) as well as a much later colonial (farmer) component. The second component is an urban landscape dating to the colonial period and is linked to the rural colonial landscape.</p> <p><u>Identified sites</u></p> <ul style="list-style-type: none"> • 7.1.1 & 7.3.1 A low scatter of stone tools mostly dating to the Middle Stone Age occur sporadically in limited numbers. • 7.3.2 A scatter of stone tools dating to the Late Stone Age consisting of tools, flakes and cores. In addition, some small pieces of undecorated, thin-walled, coarse-grained pottery were identified on the site. The tools are mostly classified as side- and end scrapers and are made from and banded iron stone. Sites containing pottery are termed Ceramic LSA (CLSA) assemblages and in all probability can be linked with the Wilton Complex. 	X	X

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Impact assessment and proposed mitigation measures
 Impact analysis of cultural heritage resources under threat of the proposed development, is based on the present understanding of the development:

7.1.1 & 7.3.1 Change Finds		
Impact assessment		
Although this material is found inside the project area, their low significance as well as the fact that the area has already extensively been disturbed due to it being surface material, the impact is viewed to be very low.		
	Without mitigation	With mitigation
Extent	Local area (1)	Local area (1)
Duration	Permanent (5)	Permanent (5)
Intensity	Low (1)	Low (1)
Probability	Improbable (2)	Improbably (2)
Significance	Low (14)	Low (14)
Status (positive or negative)	Negative	Neutral
Reversibility	Non-reversible	Non-reversible
Irreplaceable loss of resources?	No	No
Can impacts be mitigated	None	
Mitigation: None		
Cumulative impact: Very limited loss of similar features in the larger landscape.		

7.3.2 Later Stone Age dune site		
Impact assessment		
Although the prospecting plan for this area is not available, it is anticipated that it might impact on this site		
	Without mitigation	With mitigation
Extent	Site (1)	Site (1)
Duration	Permanent (5)	Permanent (5)
Intensity	Moderate (6)	Minor (2)
Probability	Probable (3)	Probable (3)
Significance	Low (36)	Low (24)
Status (positive or negative)	Negative	Positive
Reversibility	n/a	n/a
Irreplaceable loss of resources?	Yes	No
Can impacts be mitigated	Yes	

Legal requirements

- The legal requirements related to heritage specifically are specified in Section 3 of this report. For this proposed project, the assessment has determined that sites, features or objects of heritage significance occur in the project area, therefore various permits, depending on the type of site to be impacted on would be required.
- If heritage features are identified during construction, as stated in the management recommendation, these finds would have to be assessed by

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	<p>a specialist, after which a decision will be made regarding the application for relevant permits.</p> <p><u>Reasoned opinion as to whether the proposed activity should be authorised:</u></p> <ul style="list-style-type: none"> • From a heritage point of view, it is recommended that the proposed development be allowed to continue on acceptance of the conditions proposed below. <p><u>Conditions for inclusion in the environmental authorisation:</u></p> <ul style="list-style-type: none"> • The Palaeontological Sensitivity Map (SAHRIS) indicate that project area has a moderate sensitivity of fossil remains to be found and therefore a desktop palaeontological assessment is required. <p>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. The appropriate steps to take are indicated in Section 9 of the report, as well as in the Management Plan: Burial Grounds and Graves, with reference to general heritage sites, in the Addendum, Section 12.4.</p>		
<p>Paleontological Desktop Assessment</p>	<p>The proposed development is underlain by sediments of the Gordonia Formation (Kalahari Group) as well as the Dagbreek Formation (Vaalkoppies Group, Namaqua-Natal Province). A Low Palaeontological Significance has been allocated to the proposed development and it is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction and operation of the project may be authorised, as the whole extent of the development footprint is not considered sensitive in terms of palaeontological heritage.</p> <p>If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502.</p>	<p>X</p>	<p>X</p>

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	<p>Fax: +27 (0)21 462 4509. Web: www.sahra.org.za so that mitigation can be carry out by a palaeontologist.</p> <p>It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.</p> <p>Paleontological Impact Rating:</p> <p>Table 1: Summary of Impact Tables</p> <table border="1" data-bbox="489 594 1173 919"> <thead> <tr> <th></th> <th>Site</th> <th>Probability</th> <th>Duration</th> <th>Magnitude</th> <th>Reversibility</th> <th>Irreplicable Loss</th> <th>Cumulative Effect</th> <th>Significance</th> </tr> </thead> <tbody> <tr> <td></td> <td>1</td> <td>2</td> <td>4</td> <td>1</td> <td>4</td> <td>4</td> <td>2</td> <td>17</td> </tr> </tbody> </table> <p>See Page 19 of the Paleontological Desktop Assessment, the full report is available in Appendix 12</p>		Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance		1	2	4	1	4	4	2	17		
	Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance													
	1	2	4	1	4	4	2	17													

According to the DEA Screening Report, nine (9) specialist assessments have been identified for inclusion in the assessment report. Please see the table below for the list of these studies and also our response. Please refer to **Appendix 7**.

Specialist study according to DEA Screening tool	Response
Agriculture Impact Assessment	According to the DEA Screening Tool the Agriculture Theme Sensitivity of the proposed area is very high to low. The land capability falls within Land capability Class 7. The site is largely covered by agricultural fields, low shrubland with tickle/dense bush & bare non vegetated areas.

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	According to the Prospecting Work Programme (PWP) prospecting activities include 100 pits (3m x 3m x 4m) and 25 trenches (40m x 30m x 4m). The whole application area is 810.485 hectares, the area to be disturbed by pitting and trenching will be ± 4 Ha. Concurrent backfilling will take place in order to rehabilitate which means only 0.7ha will be disturbed at any given time. Mitigation measures as in the EMPr will be implemented. Due to the low disturbance (± 4 Ha over a 810.485 ha area) the impact is expected to be low.
Archaeological & Cultural Heritage Impact Assessment	According to the DEA Screening Tool the Archaeological and Cultural Heritage Theme Sensitivity is low and the Relative Paleontology Theme Sensitivity is mostly medium to low sensitivity.
Palaeontology Impact Assessment	A Heritage Impact Assessment as well as a Paleontological Desktop Assessment has been done.
Terrestrial Biodiversity Impact Assessment	<p>According to the Prospecting Work Programme (PWP) prospecting activities include 100 pits (3m x 3m x 4m) and 25 trenches (40m x 30m x 4m). The whole application area is 810.485 hectares, the area to be disturbed by pitting and trenching will be ± 4 Ha. Concurrent backfilling will take place in order to rehabilitate which means only 0.7ha will be disturbed at any given time. Mitigation measures as in the EMPr will be implemented. Due to the low disturbance (± 4 Ha over a 810.485 ha area) the impact is expected to be low.</p> <p>According to the screening report the area falls largely on a high to low terrestrial sensitive area. The area mostly consists of agricultural fields. According to the CBA map the area traverses both CBA1 & CBA 2 areas.</p>
Aquatic Biodiversity Impact Assessment	<p>According to the Prospecting Work Programme (PWP) prospecting activities include 100 pits (3m x 3m x 4m) and 25 trenches (40m x 30m x 4m). The whole application area is 810.485 hectares, the area to be disturbed by pitting and trenching will be ± 4 Ha. Concurrent backfilling will take place in order to rehabilitate which means only 0.7ha will be disturbed at any given time. Mitigation measures as in the EMPr will be implemented. Due to the low disturbance (± 4 Ha over a 810.485 ha area) the impact is expected to be low.</p> <p>According to the screening report the area falls largely on a low aquatic terrestrial sensitive area. There are small pockets that are deemed high due to some parts being classified as wetlands.</p> <p>An adequate buffer will be maintained from any water bodies, should any prospecting be conducted within the regulated zones, a Water Use Licence will be applied for.</p>
Noise Impact Assessment	We do not see the need for this study as noise is limited to working hours. The area is also far away from any residential areas.
Radioactivity Impact Assessment	This study is not necessary since the process of mining Diamonds (Alluvial, General & in Kimberlite) & diamonds does not have any radioactive effects.
Plant Species Assessment	According to the Prospecting Work Programme (PWP) prospecting activities include 100 pits (3m x 3m x 4m) and 25 trenches (40m x 30m x 4m). The whole application area is 810.485 hectares, the area to be disturbed by pitting and trenching will be ± 4 Ha. Concurrent backfilling will take place in

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	<p>order to rehabilitate which means only 0.7ha will be disturbed at any given time. Mitigation measures as in the EMPr will be implemented. Due to the low disturbance (± 4 Ha over a 810.485ha area) the impact is expected to be low.</p> <p>According to the Screening Report the proposed site also falls within a low plant species sensitive area.</p>
<p>Animal Species Assessment</p>	<p>According to the Prospecting Work Programme (PWP) prospecting activities include 100 pits (3m x 3m x 4m) and 25 trenches (40m x 30m x 4m). The whole application area is 810.485 hectares, the area to be disturbed by pitting and trenching will be ± 4 Ha. Concurrent backfilling will take place in order to rehabilitate which means only 0.7ha will be disturbed at any given time. Mitigation measures as in the EMPr will be implemented. Due to the low disturbance (± 4 Ha over a 6002.0038 ha area) the impact is expected to be low.</p> <p>According to the Screening Report the site falls mostly within a low animal sensitive area, with a small parts traversing a medium sensitivity. As the actual disturbance will only be ± 4 Ha over a 810.485ha area, we do not see the need for this study.</p> <p>No animals will be hunt or killed during the prospecting phase.</p>

L. AN ENVIRONMENTAL IMPACT STATEMENT WHICH CONTAINS—

(i) a summary of the key findings of the environmental impact assessment:

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: According to the critical biodiversity, the proposed farm portion fall within a CBA 1 & CBA 2, but mostly within cultivated fields. But through implementing mitigation measures, no adverse impacts are expected.
- Potential impacts on land use: According to the maps, the proposed application area is currently used for cultivation, the res of the area is fairly natural
- Potential impacts on heritage & paleontological resources: Should the mitigation measures be implemented, the impact will be low
- The activity which will be subject to concurrent rehabilitation will still have a low impact on the land use and will change the sense of place of the area because some of the areas already being disturbed.
- 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-medium 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 mining of Diamonds (Alluvial, in Kimberlite & General) & Diamonds will have socio-economic benefit to the area.

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

(i) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred [site] development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and

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.

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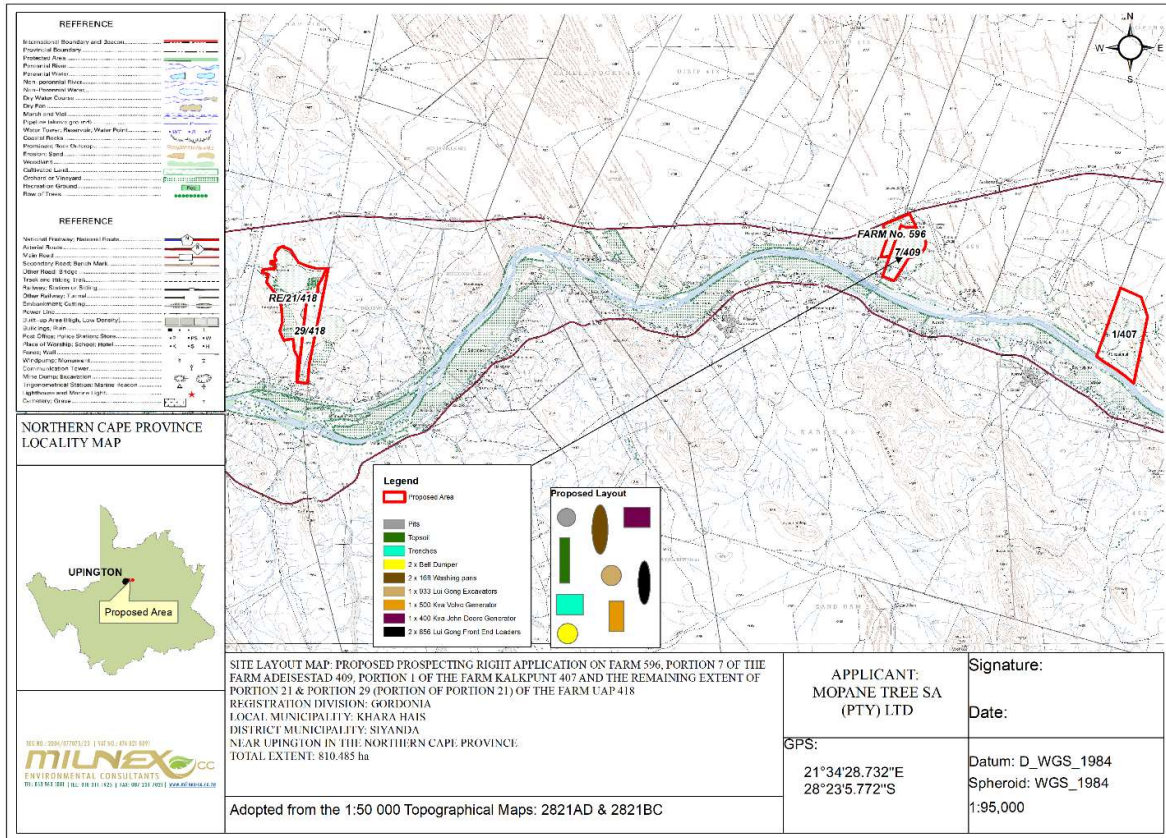


Figure 21: Site Plan

Refer to Site layout Map attached in **Appendix 4**.

(ii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

There are regional socio economic benefits due to the Diamonds (Alluvial, in Kimberlite & General) being prospected in the Northern Cape Province and greater knowledge is gained on the mineralogy of South Africa. 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. Significant adverse social environmental impacts are anticipated.

M. PROPOSED IMPACT MANAGEMENT OBJECTIVES AND THE IMPACT MANAGEMENT OUTCOMES FOR INCLUSION IN THE EMPr

Based on the assessment and where applicable the recommendations from specialist reports, the recording of proposed [impact management objectives, and the] impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation.

Management objectives include:

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

Expected outcomes include:

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

- Minimum impacts on the environment as a result of Diamonds (Alluvial, in Kimberlite & General) & Diamond prospecting.
- Compliance with legislative requirements.
- Mine is neat and tidy and well managed.

N. FINAL PROPOSED ALTERNATIVES.

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

This alternative asks the question, if there is not, from an environmental perspective, a more suitable location for the proposed activity. on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province is preferred due to the sites underlying Diamonds (Alluvial, in Kimberlite & General) bearing gravel, therefore there will be no other alternative (i.e. to facilitate the movement of machinery, equipment, infrastructure).

O. ASPECTS FOR INCLUSION AS CONDITIONS OF AUTHORISATION.

(Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;)

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

P. DESCRIPTION OF ANY ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE.

(Which relate to the assessment and mitigation measures proposed)

The uncertainties in results are mostly related to the availability of information, time available to gather the relevant information as well as the sometimes subjective nature of the assessment methodology. In terms of addressing the key issues the EAP is satisfied that there are no major gaps in knowledge and that the report provide sufficient information to conduct the significance rating and provide the environmental authority with sufficient information to make an informed decision.

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

(and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;)

Reasons why the activity should be authorized or not.

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

The proposed prospecting area is targeted as, historically, several Diamonds (Alluvial, in Kimberlite & General) & Diamonds occurrences are known in the area, and a number of these have been exploited in the past. There are also various Diamonds (Alluvial, in Kimberlite & General) & Diamond operations within the vicinity of the exploration area.

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

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

Conditions that must be included in the authorisation

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

Milnex CC: EIA506PR – EIR & EMPr: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

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

The EMPr should be binding on all managers and contractors operating/utilizing the site.
The applicant shall familiarize himself with the content of this document and the attached specialist studies and the requirements/conditions thereof.

R. PERIOD FOR WHICH THE ENVIRONMENTAL AUTHORISATION IS REQUIRED.

For a minimum of 5 years.

S. AN UNDERTAKING UNDER OATH OR AFFIRMATION BY THE EAP IN RELATION TO:

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 Environmental Impacts 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, Christiana Baron 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 CC – Environmental Consultants

Name of company:

01 – 06 - 2022

Date:

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

T. FINANCIAL PROVISION

(where applicable, details of any financial provision[s] for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;)

CALCULATION OF THE QUANTUM							
Applicant: Mopane Tree SA (Pty) Ltd		Ref No.:		NC30/5/11/2/12979PR			
Evaluators: Milnex CC Environmental Consultants		Date:		Feb-22			
No.	Description	Unit	A Quantity	B Master Rate	C Multiplication factor	D Weighting factor 1	E=A*B*C*D Amount (Rands)
1	Dismantling of processing plant and related structures (including overland conveyors and powerlines)	m3	400	19	1	1	7600
2 (A)	Demolition of steel buildings and structures	m2	0	171	1	1	0
2 (B)	Demolition of reinforced concrete buildings and structures	m2	0	400	1	1	0
3	Rehabilitation of access roads	m2	200	49	1	1	9800
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	471	1	1	0
4 (A)	Demolition and rehabilitation of non-electrified railway lines	m	0	257	1	1	0
5	Demolition of housing and/or administration facilities	m2	0	542	1	1	0
6	Opencast rehabilitation including final voids and ramps	ha	0,6	284292	0,52	1	88699,104
7	Sealing of shafts adits and inclines	m3	0	145	1	1	0
8 (A)	Rehabilitation of overburden and spoils	ha	0,04	189518	1	1	7580,72
8 (B)	Rehabilitation of processing waste deposits and evaporation ponds (non-polluting potential)	ha	0,09	236054	1	1	21244,86
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9	Rehabilitation of subsided areas	ha	0,1	158701	1	1	15870,1
10	General surface rehabilitation	ha	0,1	150138	1	1	15013,8
11	River diversions	ha	0	150138	1	1	0
12	Fencing	m	200	171	1	1	34200
13	Water management	ha	0	57087	1	1	0
14	2 to 3 years of maintenance and aftercare	ha	0,18	19930	1	1	3587,4
15 (A)	Specialist study	Sum	0			1	0
15 (B)	Specialist study	Sum	0			1	0
Sub Total 1							203595,984
1	Preliminary and General		24431,51808	weighting factor 2			25653,09398
				1,05			
2	Contingencies			20359,5984			20359,5984
Subtotal 2							249608,68
VAT (15%)							37441,30
Grand Total							287050

It is planned that 100 pits will be dug (it may be less depending on the results) at an extent of 3m (length) x 3m (breath) x 4m (depth).

- 100 pits / 2years = 50 pits dug per year
- Total area to be disturbed per year = 50 pits x (3m x 3m) / 10 000 = 0.045Ha disturbed per year
- Total area disturbed for 24 months = 100 pits x (3m x 3m) / 10 000 = 0.09 Ha disturbed

Calculations

It is planned that 25 trenches will be dug at an extent of 40m (length) x 30m (breath) x 5m (depth).

- 25 trenches / 2 years = 12.5 trenches dug per year
- Total area to be disturbed per year = 12.5 trenches x (40m x 30m) / 10 000 = 1.5 Ha disturbed per year.
- Total area disturbed for 48 months = 25 trenches x (40m x 30m) / 10 000 = 3 Ha disturbed

The total area to be disturbed in one year is 0.045ha + 3ha = 3.045ha

However, concurrent backfilling will take place in order to rehabilitate. Please see the explanation below how concurrent rehabilitation is carried out:

The exposed diamondiferous gravel of trench no.1 and no.2 will then be removed. The diamondiferous gravel will be sorted by means of a screen and all material larger than for example 100mm will be separated from the rest. This material will be used in the backfilling stage. Screened material for example smaller than 100mm will be fed into a wet rotary screen and then directly onto the washing pans.

As prospecting activities progress from trench no.2 towards the following trench no.3, backfilling and rehabilitation of trench no.1 will commence. The coarse gravel sifted at the screen, tailings from the pans and fine concrete will be transported back into open trench no.1. During this process of backfilling, variation in the dumping sequence of different sized materials will be followed to ensure better compaction and stability of the reclaimed gravel. This will ensure that voids surrounding the coarse gravel will be filled up with finer

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sediments. Compaction will be achieved through heavy vehicles during backfilling stage. This prospecting sequence will be utilised for the final rehabilitation of the last actively prospected trench.

Since concurrent backfilling will take place in order to rehabilitate, the total area to be disturbed per year will be less than the above calculation. Because of the aforementioned the total area to be disturbed is divided by two. Following the aforementioned sequence will ensure that the maximum area to be disturbed by prospecting activities at any given time, is only approximately 1.05ha

Please see the calculations below:

100 pits in 24 months and 50 trenches in 24 months	
The area to be disturbed for 1 pit	$1 \text{ pit} \times (3\text{m} \times 3\text{m}) / 10\,000 = 0.0009$
The area to be disturbed for 12 months (50 pits)	$0.0009 \times 50 \text{ pits} = 0.045$
The area to be disturbed for 1 trench	$1 \text{ trench} \times (40\text{m} \times 30\text{m}) / 10\,000 = 0.12\text{ha}$
3 trenches will be worked on at any given time:	
• 2 trenches will be open to remove gravel	$0.12\text{ha} \times 2 \text{ trenches} = 0.24\text{ha}$
• 1 trench will be backfilled and rehabilitated	$0.24\text{ha} / 2 = 0.12\text{ha}$
The area to be disturbed at any given time	$0.12\text{ha} + 0.36\text{ha} = 0.48$
After the trench is backfilled and rehabilitated only then will another trench be opened. This sequence will be done for the 50 trenches.	
Total	$0.12\text{ha} + 0.48\text{ha} = 0.6 \text{ Ha}$

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 CC.

B. 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 **Mopane Tree SA (Pty) Ltd** will be submitted

Rehabilitation Fund

Mopane Tree SA (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) **Any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and**

None of the methodologies approved for the scoping report were deviated

(ii) **Motivation for the deviation.**

Not applicable

V. ANY SPECIFIC INFORMATION THAT MAY BE REQUIRED BY THE COMPETENT AUTHORITY; AND

W. COMPLIANCE WITH THE PROVISIONS OF SECTIONS 24(4)(A) AND (B) OF THE ACT

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

Read with Section 24 (3) (A) and (7) of the National Environmental Management Act (Act 107 of 1998). The EIA Report must include the:

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

The diamonds (alluvial, in kimberlite & general) prospecting will not impact directly on any socio-economic aspects. Indirect socio-economic benefits are expected to be associated with the creation of employment.

- iii. **Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act.** (Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) with the exception of the national estate contemplated in section 3(2)(j)(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).

The Diamonds (Alluvial, in Kimberlite & General) & Diamonds prospecting will, with mitigation measures, not impact on any heritage estate referred to in section 3(2) of the National Heritage Resources Act. In terms of the National Heritage Resource Act no 25 of 1999. Heritage resources including archaeological and paleontological sites over 100 years old, graves older than 60 years, structure older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resource Authority, which means that before such sites are disturbed by development it is incumbent on the developer to ensure that a heritage impact assessment is done and the Provincial Heritage Resources Authority and SAHRA will be contacted immediately and work will stop.

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.

Diamonds (Alluvial, General & in Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province, were identified. The specific site has been chosen for its mineral resources thus making an alternative site selection null and void. No prospecting should commence without the necessary permits and the impacts on the surrounding area, the livestock grazing, agricultural land and natural area should be kept to the minimum.

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

An EMPr must comply with section 24N of the Act and include—

A. DETAILS OF—

- (i) the EAP who prepared the EMPr; and
- (ii) the expertise of that EAP to prepare an EMPr, including a curriculum vitae;

Name of Practitioner	Qualifications	Contact details
Mr. Christiaan Baron	Master's Degree in Environmental Management (M.ENV.MAN) (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: christiaan@milnex-sa.co.za
Percy Sehaole Pr. Sci. Nat. EAPASA (2019/959)	Master's Degree in Environmental Science Master's Degree in Environmental Management (refer to Appendix 1)	Tel No.: (018) 011 1925 Fax No.: (053) 963 2009 e-mail address: percy@milnex-sa.co.za
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

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

B. DESCRIPTION OF THE ASPECTS OF THE ACTIVITY

(a detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;)

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).

C. COMPOSITE MAP

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

Refer to Locality Map, attached as in **Appendix 3**.

D. A DESCRIPTION OF THE IMPACT MANAGEMENT [OBJECTIVES] OUTCOMES, INCLUDING MANAGEMENT STATEMENTS, IDENTIFYING THE IMPACTS AND RISKS THAT NEED TO BE AVOIDED, MANAGED AND MITIGATED AS IDENTIFIED THROUGH THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR ALL PHASES OF THE DEVELOPMENT INCLUDING—

- 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 Diamonds (Alluvial, in Kimberlite & General) mine will aim to ensure that the residual post-closure impacts be minimized and be acceptable to relevant parties. To achieve these closure objectives, the following will be implemented:

- All prospecting related infrastructure, foundations and concrete areas will be decommissioned, removed from the site and appropriately disposed of. Reclaimable structures such as metal, electrical installations or equipment will be sold for re-use or as scrap.
- All disturbed areas within the site not already vegetated will be re-vegetated with appropriate indigenous, ecologically adapted species appropriate to the area and the final land use as soon as possible after operation ceases. Progress of vegetation growth/establishment, stability and drainage/erosion will be monitored and, in the event of adverse trends being identified, corrective measures will be implemented.
- Vegetation monitoring will consider, inter alia, the establishment of perennial ground cover and infestation by alien invasive plant species. The encroachment of indigenous vegetation into the area will be used as an indication of a stable, self-sustaining vegetation cover with little risk of retrogressing to a situation where are and water pollution may occur.
- Final landforms must be resilient to perturbation and also be self-sustaining to obviate/limit further/ongoing interventions and maintenance by **Mopane Tree SA (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 cattle 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.

E. A DESCRIPTION AND IDENTIFICATION OF IMPACT MANAGEMENT OUTCOMES REQUIRED FOR THE ASPECTS CONTEMPLATED IN PARAGRAPH (D);]

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.

F. A DESCRIPTION OF PROPOSED IMPACT MANAGEMENT ACTIONS, IDENTIFYING THE MANNER IN WHICH THE IMPACT MANAGEMENT [OBJECTIVES AND] OUTCOMES CONTEMPLATED IN PARAGRAPH (D) [AND (E)] WILL BE ACHIEVED, AND MUST, WHERE APPLICABLE, INCLUDE ACTIONS TO —

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 10**.

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

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

CALCULATION OF THE QUANTUM							
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Evaluators: Milnex CC Environmental Consultants		Date:		Feb-22			
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- Total area disturbed for 48 months = 25 trenches x (40m x 30m) / 10 000 = 3 Ha disturbed

The total area to be disturbed in one year is 0.045ha + 3ha = 3.045ha

However, concurrent backfilling will take place in order to rehabilitate. Please see the explanation below how concurrent rehabilitation is carried out:

The exposed diamondiferous gravel of trench no.1 and no.2 will then be removed. The diamondiferous gravel will be sorted by means of a screen and all material larger than for example 100mm will be separated from the rest. This material will be used in the backfilling stage. Screened material for example smaller than 100mm will be fed into a wet rotary screen and then directly onto the washing pans.

As prospecting activities progress from trench no.2 towards the following trench no.3, backfilling and rehabilitation of trench no.1 will commence. The coarse gravel sifted at the screen, tailings from the pans and fine concrete will be transported back into open trench no.1. During this process of backfilling, variation in the dumping sequence of different sized materials will be followed to ensure better compaction and stability of the reclaimed gravel. This will ensure that voids surrounding the coarse gravel will be filled up with finer

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sediments. Compaction will be achieved through heavy vehicles during backfilling stage. This prospecting sequence will be utilised for the final rehabilitation of the last actively prospected trench.

Since concurrent backfilling will take place in order to rehabilitate, the total area to be disturbed per year will be less than the above calculation. Because of the aforementioned the total area to be disturbed is divided by two. Following the aforementioned sequence will ensure that the maximum area to be disturbed by prospecting activities at any given time, is only approximately 1.05ha

Please see the calculations below:

100 pits in 24 months and 50 trenches in 24 months	
The area to be disturbed for 1 pit	$1 \text{ pit} \times (3\text{m} \times 3\text{m}) / 10\,000 = 0.0009$
The area to be disturbed for 12 months (50 pits)	$0.0009 \times 50 \text{ pits} = 0.045$
The area to be disturbed for 1 trench	$1 \text{ trench} \times (40\text{m} \times 30\text{m}) / 10\,000 = 0.12\text{ha}$
3 trenches will be worked on at any given time:	
• 2 trenches will be open to remove gravel	$0.12\text{ha} \times 2 \text{ trenches} = 0.24\text{ha}$
• 1 trench will be backfilled and rehabilitated	$0.24\text{ha} / 2 = 0.12\text{ha}$
The area to be disturbed at any given time	$0.12\text{ha} + 0.36\text{ha} = 0.48$
After the trench is backfilled and rehabilitated only then will another trench be opened. This sequence will be done for the 50 trenches.	
Total	$0.12\text{ha} + 0.48\text{ha} = 0.6 \text{ Ha}$

Financial Guarantee

The financial guarantee for the rehabilitation for land disturbed **Mopane Tree SA (Pty) Ltd** will be submitted

Rehabilitation Fund

Mopane Tree SA (Pty) Ltd will also make provision for rehabilitation during closure by establishing a rehabilitation trust.

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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, ablation 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, ablation, 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 Diamonds (Alluvial, in Kimberlite & General) prospecting as the case may be.
Clearance of vegetation	Pitting and trenching phase- (construction and operation phase)	810.485Ha – 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).	<ol style="list-style-type: none"> 1. Site clearing must take place in a phased manner, as and when required. 2. Areas which are not to be prospected on within two months must not be cleared to reduce erosion risks. 3. The area to be cleared must be clearly demarcated and this footprint strictly maintained. 4. Spoil that is removed from the site must be removed to an approved spoil site or a licensed landfill site. 5. The necessary silt fences and erosion control measures must be implemented in areas where these risks are more prevalent. 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.
Construction of roads	Pitting and trenching phase- (construction and operation phase)	+- 500m	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	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.

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			<p>reached should be documented and no verbal agreements should be made. The Contractor shall clearly mark all access roads. Roads not to be used shall be marked with a "NO ENTRY for prospecting vehicles" sign.</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 nearby tarr road 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 Diamonds (Alluvial, in Kimberlite & General) – Soils and geology	Pitting and trenching phase- (construction and operation phase)	810.485Ha – 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).	<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 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting activities.

Milnex CC: EIA506PR – EIR & EMPR: The proposed Prospecting Right combined with a Waste Licence application to prospect for Diamond (Alluvial), Diamond (General), Diamonds and Diamonds (Kimberlite) near Upington on Portion 7 of the farm Adeisestad 409, Portion 1 of the farm Kalkpunt 407, Remaining Extent of Portion 21 and Portion 29 (portion of portion 21) of the farm UAP 418 & on Farm 596, Registration Division: Gordonia, Northern Cape province.

			<p>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> <ol style="list-style-type: none"> 2. Care must be taken not to mix topsoil and subsoil during stripping. 3. The topsoil must be conserved on site in and around the pit/trench area. 4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order. 5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms, 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 Diamonds (Alluvial, in Kimberlite & General) – excavations and blasting	Pitting and trenching phase- (construction and operation phase)	810.485Ha – 100 pits (3m x 3m x 4m), 25 trenches (40m x 30m x 5m).	<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. 	Compliance with Duty of Care as detailed within NEMA	Duration of operations on the prospecting area

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			<ol style="list-style-type: none"> 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. 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 		
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			levels very often is a sign of the imminent mechanical failure of a machine.		
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IMPACT MANAGEMENT OUTCOMES

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

ACTIVITY (whether listed or not listed). (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.).	POTENTIAL IMPACT (e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc....etc...)	ASPECTS AFFECTED	PHASE In which impact is anticipated (e.g. Construction, commissioning, operational Decommissioning, closure, post-closure)	MITIGATION TYPE (modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc. etc) E.g. <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring • Remedy through rehabilitation.. 	STANDARD TO BE ACHIEVED (Impact avoided, noise levels, dust levels, rehabilitation standards, end use objectives) etc.
Clearance of vegetation	Loss or fragmentation of habitats	Fauna & flora	Pitting and trenching phase-(construction and operation phase)	Existing vegetation <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. Rehabilitation <ol style="list-style-type: none"> 5. All damaged areas shall be rehabilitated upon completion of the contract. 6. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural 	Minimisation of impacts to acceptable limits

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				<p>vegetative conditions prevailing prior to construction.</p> <ol style="list-style-type: none"> 7. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit. 8. Rehabilitation must take place in a phased approach as soon as possible. 9. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding. 10. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas. 11. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged. <p>Demarcation of prospecting area</p> <ol style="list-style-type: none"> 12. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan. 13. The prospecting area must be well demarcated and no construction/prospecting activities must be allowed outside of this demarcated footprint. 14. Vegetation removal must be phased in order to reduce impact of construction/prospecting. 15. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas. 16. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas. 17. Soils must be kept free of petrochemical solutions that may be kept on site during construction/prospecting. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora. <p>Utilisation of resources</p>	
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				<p>18. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO.</p> <p>Exotic vegetation</p> <p>19. Alien vegetation on the site will need to be controlled.</p> <p>20. The Contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>21. The spread of exotic species occurring throughout the site should be controlled.</p> <p>Herbicides</p> <p>22. Herbicide use shall only be allowed according to contract specifications. The application shall be according to set specifications and under supervision of a qualified technician. The possibility of leaching into the surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.</p> <p>23. The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.</p> <p>Fauna</p> <p>24. Rehabilitation to be undertaken as soon as possible after the prospecting activities have been completed.</p> <p>25. No trapping or snaring to fauna on the construction/prospecting site should be allowed.</p> <p>26. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</p>	
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Prospecting Diamonds (Alluvial, in Kimberlite & general) – excavations	Loss of topsoil	Soil	Pitting and trenching phase-(construction and operation phase)	<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 and related activities prior to the commencement of major earthworks. This should include the building footprints, working areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas. 2. Care must be taken not to mix topsoil and subsoil during stripping. 3. The topsoil must be conserved on site in and around the pit/trench area. 4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order. 5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases. 6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding. 7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager. <p>Establish an effective record keeping system for each area where soil is disturbed for prospecting purposes. These records should be included in environmental performance reports, and should include all the records below.</p> <ul style="list-style-type: none"> • Record the GPS coordinates of each area. • Record the date of topsoil stripping. 	Minimisation of impacts to acceptable limits
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				<ul style="list-style-type: none"> • 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. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 4. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 5. Other erosion control measures that can be implemented are as follows: <ul style="list-style-type: none"> ○ Brush packing with cleared vegetation ○ Mulch or chip packing ○ Planting of vegetation ○ Hydroseeding/hand sowing 6. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 7. All erosion control mechanisms need to be regularly maintained. 8. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 	Minimisation of impacts to acceptable limits

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				<ol style="list-style-type: none"> 9. Retention of vegetation where possible to avoid soil erosion. 10. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 11. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting activities are completed. This should be done through seeding with indigenous grasses. 12. No impediment to the natural water flow other than approved erosion control works is permitted. 13. To prevent stormwater damage, the increase in stormwater run-off resulting from construction/prospecting activities must be estimated and the drainage system assessed accordingly. 14. 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. 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. 	Minimisation of impacts to acceptable limits

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				<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

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				<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 & paleontological aspects	Heritage & Palaeontology	Pitting and trenching phase-(construction and operation phase)	<p>Heritage:</p> <p>For the current study, the following mitigation measures are proposed, to be implemented only if any of the identified sites or features are to be impacted on by the proposed development activities:</p> <ul style="list-style-type: none"> • (1) Avoidance/Preserve: This is viewed to be the primary form of mitigation and applies where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have 	Minimisation of impacts to acceptable limits

				<p>a high negative impact. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources. The site should be retained in situ and a buffer zone should be created around it, either temporary (by means of danger tape) or permanently (wire fence or built wall). Depending on the type of site, the buffer zone can vary from</p> <ul style="list-style-type: none"> • 10 metres for a single grave, or a built structure, to • 50 metres where the boundaries are less obvious, e.g. a Late Iron Age site. <p>(2) Archaeological investigation/Relocation of graves: This option can be implemented with additional design and construction inputs. This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated. Mitigation is to excavate the site by archaeological techniques, document the site (map and photograph) and analyse the recovered material to acceptable standards. This can only be done by a suitably qualified archaeologist.</p> <ul style="list-style-type: none"> • This option should be implemented when it is impossible to avoid impacting on an identified site or feature. • This also applies for graves older than 60 years that are to be relocated. For graves younger than 60 years a permit from SAHRA is not required. However, all other legal requirements must be adhered to. <ul style="list-style-type: none"> ▪ Impacts can be beneficial – e.g. mitigation contribute to knowledge <p>3) Rehabilitation: When features, e.g. buildings or other structures are to be re-used. Rehabilitation is considered in heritage management terms as an intervention typically involving the adding of a new heritage layer to enable a new sustainable use.</p>	
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				<ul style="list-style-type: none"> • The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation. • Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, repair and maintenance, consolidation and minimal loss of historical fabric. <p>Conservation measures would be to record the buildings/structures as they are (at a particular point in time). The records and recordings would then become the 'artefacts' to be preserved and managed as heritage features or (movable) objects.</p> <p>This approach automatically also leads to the enhancement of the sites or features that are re-used.</p> <p>(4) Mitigation is also possible with additional design and construction inputs. Although linked to the previous measure (rehabilitation) a secondary though 'indirect' conservation measure would be to use the existing architectural 'vocabulary' of the structure as guideline for any new designs.</p> <ul style="list-style-type: none"> o The following principle should be considered: heritage informs design. <ul style="list-style-type: none"> ▪ This approach automatically also leads to the enhancement of the sites or features that are re-used. <ul style="list-style-type: none"> • (5) No further action required: This is applicable only where sites or features have been rated to be of such low significance that it does not warrant further documentation, as it is viewed to be fully documented after inclusion in this report. <ul style="list-style-type: none"> o Site monitoring during development, by an ECO or the heritage specialist are often added to this 	
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				<p>recommendation in order to ensure that no undetected heritage/remains are destroyed.</p> <p>Palaeontology:</p> <ul style="list-style-type: none"> • If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find. • The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates. • A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates. • Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found. <p>Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.</p>	
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				<ul style="list-style-type: none"> The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find. In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site. Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area. 	
Waste management		Pollution	Pitting and trenching phase-(construction and operation phase)	<p>Litter management</p> <ol style="list-style-type: none"> Refuse bins must be placed at strategic positions to ensure that litter does not accumulate within the construction site. 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. Good housekeeping practices should be implemented to regularly maintain the litter and rubble situation on the construction site. 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. 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. 	Minimisation of impacts to acceptable limits

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				<ol style="list-style-type: none"> 6. Skip waste containers should be maintained on site. These should be kept covered and arrangements made for them to be collected regularly. 7. All waste must be removed from the site and transported to a landfill site promptly to ensure that it does not attract vermin or produce odours. 8. Where a registered waste site is not available close to the construction site, the Contractor shall provide a method statement with regard to waste management. 9. A certificate of disposal shall be obtained by the Contractor and kept on file, if relevant. 10. Under no circumstances may solid waste be burnt on site. 11. All waste must be removed promptly to ensure that it does not attract vermin or produce odours. <p>Hazardous waste</p> <ol style="list-style-type: none"> 12. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of offsite at a licensed landfill site, where practical. Incineration may be used where relevant. 13. Contaminants to be stored safely to avoid spillage. 14. Machinery must be properly maintained to keep oil leaks in check. 15. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction and any spills shall immediately be cleaned up and all affected areas rehabilitated. <p>Sanitation</p> <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 	
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				<p>indiscriminate sanitary activities on site shall be allowed.</p> <ol style="list-style-type: none"> 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. 	
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				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.	
Water Use and Quality	Water pollution	Water	Pitting and trenching phase-(construction and operation phase)	<p>Water Use</p> <ol style="list-style-type: none"> 1. Develop a sustainable water supply management plan to minimise the impact to natural systems by managing water use, avoiding depletion of aquifers and minimising impacts to water users. 2. Water must be reused, recycled or treated where possible. <p>Water Quality</p> <ol style="list-style-type: none"> 3. The quality and quantity of effluent streams discharged to the environment including stormwater should be managed and treated to meet applicable effluent discharge guidelines. 4. Discharge to surface water should not result in contaminant concentrations in excess of local ambient water quality criteria outside a scientifically established mixing zone. 5. Efficient oil and grease traps or sumps should be installed and maintained at refuelling 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. 	

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				<ol style="list-style-type: none"> 9. Promote a water saving mind set with construction/prospecting workers in order to Contractor ensure less water wastage. 10. Hazardous substances must be stored at least 40m from any water bodies on site to avoid pollution. 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. 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. 13. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed. 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>The cut-off trenches and silt fences will be installed where necessary as to control runoff storm water by attenuating it and control the movement of sediment on the premises.</p> <p>These structures will be monitored on a regular basis. It is suggested that it be monitored on a weekly basis during the rainy season, and after possible rain events during the dry season.</p> <p>If these practices is found to be insufficient for the control of storm water and sedimentation, other alternatives should immediately be investigated and implemented.</p> <p>Groundwater resource protection</p>	
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				<p>15. Process solution storage ponds and other impoundments designed to hold non fresh water or non-treated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.</p> <p>16. Prevent dirty water runoff from leaving the general mining area;</p> <p>17. Compact the base of dirty areas, like the workshops and oil and diesel storage areas to minimise infiltration of poor-quality water to the underlying aquifers;</p> <p>18. Enough supply of absorbent fibre should be kept at the site to contain accidental spills;</p> <p>19. Contain dirty water in return water dams and re-use dirty water for dust suppression and make up water in the plant;</p> <p>20. Proper storm water management should be implemented. Berms should also be constructed to ensure separation of clean water and dirty water areas;</p> <p>21. A detailed mine closure plan should be prepared during the operational phase, including a risk assessment, water resource impact prediction etc. as stipulated in the DWS Best Practice Guidelines. The implementation of the mine closure plan, and the application for the closure certificate can be conducted during the decommissioned phase.</p> <p>Sanitation</p> <p>22. Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).</p> <p>23. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.</p> <p>Concrete mixing</p> <p>24. Concrete contaminated water must not enter soil or any natural drainage system as this disturbs</p>	
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				<p>the natural acidity of the soil and affects plant growth.</p> <p>Public areas</p> <p>25. 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>26. 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>27. No washing or servicing of vehicles on site.</p> <p>Infrastructure</p> <p>28. Infrastructure should adhere to the GN704 of the South African National Water Act (36 of 1998) and not be located within the 1:100- year Return Period flood line. This is essential for the safety of human life as well as for the protection of infrastructure from flood inundation and destruction.</p>	
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IMPACT MANAGEMENT ACTIONS

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

ACTIVITY Whether listed or not listed.	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
(E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control,	(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater	(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting	Describe the time period when the measures in the environmental management programme must be	(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

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berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	contamination, air pollution etc....etc...)	controls, avoidance, relocation, alternative activity etc.) E.g. <ul style="list-style-type: none"> • Modify through alternative method. • Control through noise control • Control through management and monitoring Remedy through rehabilitation..	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 Diamonds (Alluvial, in Kimberlite & General) prospecting as the case may be.	that have been identified by Competent Authorities)
Clearance of vegetation	Loss or fragmentation of habitats	<p>Existing vegetation</p> <ol style="list-style-type: none"> 1. Vegetation removal must be limited to the prospecting site. 2. Vegetation to be removed as it becomes necessary rather than removal of all vegetation throughout the site in one step. 3. No vegetation to be used for firewood. 4. Exotic and invasive plant species should not be allowed to establish, if the development is approved. <p>Rehabilitation</p> <ol style="list-style-type: none"> 5. All damaged areas shall be rehabilitated upon completion of the contract. 6. Re-vegetation of the disturbed site is aimed at approximating as near as possible the natural vegetative conditions prevailing prior to construction. 7. All natural areas impacted during construction/prospecting must be rehabilitated with locally indigenous grasses typical of the representative botanical unit. 	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.

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		<ol style="list-style-type: none"> 8. Rehabilitation must take place in a phased approach as soon as possible. 9. Rehabilitation process must make use of species indigenous to the area. Seeds from surrounding seed banks can be used for re-seeding. 10. Rehabilitation must be executed in such a manner that surface run-off will not cause erosion of disturbed areas. 11. Planting of indigenous tree species in areas not to be cultivated or built on must be encouraged. <p>Demarcation of prospecting area</p> <ol style="list-style-type: none"> 12. All plants not interfering with prospecting operations shall be left undisturbed clearly marked and indicated on the site plan. 13. The prospecting area must be well demarcated and no construction activities must be allowed outside of this demarcated footprint. 14. Vegetation removal must be phased in order to reduce impact of construction/prospecting. 15. Site office and laydown areas must be clearly demarcated and no encroachment must occur beyond demarcated areas. 16. Strict and regular auditing of the prospecting process to ensure containment of the prospecting and laydown areas. 17. Soils must be kept free of petrochemical solutions that may be kept on site during construction/prospecting. Spillage can result in a loss of soil functionality thus limiting the re-establishment of flora. <p>Utilisation of resources</p> <ol style="list-style-type: none"> 18. Gathering of firewood, fruit, muti plants, or any other natural material onsite or in areas adjacent to the site is prohibited unless with prior approval of the ECO. <p>Exotic vegetation</p>		
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		<p>19. Alien vegetation on the site will need to be controlled.</p> <p>20. The Contractor should be responsible for implementing a programme of weed control (particularly in areas where soil has been disturbed); and grassing of any remaining stockpiles to prevent weed invasion.</p> <p>21. The spread of exotic species occurring throughout the site should be controlled.</p> <p>Herbicides</p> <p>22. Herbicide use shall only be allowed according to contract specifications. The application shall be according to set specifications and under supervision of a qualified technician. The possibility of leaching into the surrounding environment shall be properly investigated and only environmentally friendly herbicides shall be used.</p> <p>23. The use of pesticides and herbicides on the site must be discouraged as these impact on important pollinator species of indigenous vegetation.</p> <p>Fauna</p> <p>24. Rehabilitation to be undertaken as soon as possible after prospecting has been completed.</p> <p>25. No trapping or snaring to fauna on the construction/prospecting site should be allowed.</p> <p>26. No faunal species must be disturbed, trapped, hunted or killed by maintenance staff during any routine maintenance at the development.</p>		
Prospecting of Diamonds (Alluvial, in Kimberlite & General) – excavations	Loss of topsoil	<p>1. The Contractor should, prior to the commencement of earthworks determine the average depth of topsoil, and agree on this with the ECO. The full depth of topsoil should be stripped from areas affected by construction/prospecting and related activities prior to the commencement of major earthworks. This should include the building footprints, working</p>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>areas and storage areas. Topsoil must be reused where possible to rehabilitate disturbed areas.</p> <ol style="list-style-type: none"> 2. Care must be taken not to mix topsoil and subsoil during stripping. 3. The topsoil must be conserved on site in and around the pit/trench area. 4. Subsoil and overburden in the prospecting area should be stockpiled separately to be returned for backfilling in the correct soil horizon order. 5. If stockpiles are exposed to windy conditions or heavy rain, they should be covered either by vegetation or geofabric, depending on the duration of the project. Stockpiles may further be protected by the construction of berms or low brick walls around their bases. 6. Stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding. 7. Where contamination of soil is expected, analysis must be done prior to disposal of soil to determine the appropriate disposal route. Proof from an approved waste disposal site where contaminated soils are dumped if and when a spillage/leakage occurs should be attained and given to the project manager. <p>Establish an effective record keeping system for each area where soil is disturbed for prospecting purposes. These records should be included in environmental performance reports, and should include all the records below.</p> <ul style="list-style-type: none"> • Record the GPS coordinates of each area. <ul style="list-style-type: none"> • 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 		
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		to show vegetation establishment and evaluate progress of restoration over time.		
	Erosion	<ol style="list-style-type: none"> 1. An effective system of run-off control should be implemented, where it is required, that collects and safely disseminates run-off water from all hardened surfaces and prevents potential down slope erosion. 2. Periodical site inspection should be included in environmental performance reporting that inspects the effectiveness of the run-off control system and specifically records the occurrence of any erosion on site or downstream. 3. Wind screening and stormwater control should be undertaken to prevent soil loss from the site. 4. The use of silt fences and sand bags must be implemented in areas that are susceptible to erosion. 5. Other erosion control measures that can be implemented are as follows: <ul style="list-style-type: none"> o Brush packing with cleared vegetation o Mulch or chip packing o Planting of vegetation o Hydroseeding/hand sowing 6. Sensitive areas need to be identified prior to construction/prospecting so that the necessary precautions can be implemented. 7. All erosion control mechanisms need to be regularly maintained. 8. Seeding of topsoil and subsoil stockpiles to prevent wind and water erosion of soil surfaces. 9. Retention of vegetation where possible to avoid soil erosion. 10. Vegetation clearance should be phased to ensure that the minimum area of soil is exposed to potential erosion at any one time. 11. Re-vegetation of disturbed surfaces should occur immediately after construction/prospecting activities are completed. This should be done through seeding with indigenous grasses. 	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.

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		<p>12. No impediment to the natural water flow other than approved erosion control works is permitted.</p> <p>13. To prevent stormwater damage, the increase in stormwater run-off resulting from construction/prospecting activities must be estimated and the drainage system assessed accordingly. A drainage plan must be submitted to the Engineer for approval and must include the location and design criteria of any temporary stream crossings.</p> <p>14. Stockpiles not used in three (3) months after stripping must be seeded/backfilled to prevent dust and erosion.</p>		
	Air Pollution	<p>Dust control</p> <p>14. Wheel washing and damping down of un-surfaced and un-vegetated areas.</p> <p>15. Retention of vegetation where possible will reduce dust travel.</p> <p>16. Clearing activities must only be done during agreed working times and permitting weather conditions to avoid drifting of sand and dust into neighbouring areas.</p> <p>17. Damping down of all exposed soil surfaces with a water bowser or sprinklers when necessary to reduce dust.</p> <p>18. The Contractor shall be responsible for dust control on site to ensure no nuisance is caused to the neighbouring communities.</p> <p>19. A speed limit of 30km/h must not be exceeded on site.</p> <p>20. Any complaints or claims emanating from the lack of dust control shall be attended to immediately by the Contractor.</p> <p>21. Any dirt roads that are utilised by the workers must be regularly maintained to ensure that dust levels are controlled.</p> <p>Odour control</p> <p>22. Regular servicing of vehicles in order to limit gaseous emissions.</p>	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

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		<p>23. Regular servicing of onsite toilets to avoid potential odours.</p> <p>Rehabilitation</p> <p>24. The Contractor should commence rehabilitation of exposed soil surfaces as soon as practical after completion of earthworks.</p> <p>Fire prevention</p> <p>25. No open fires shall be allowed on site under any circumstance. All cooking shall be done in demarcated areas that are safe and cannot cause runaway fires.</p> <p>26. The Contractor shall have operational fire-fighting equipment available on site at all times. The level of firefighting equipment must be assessed and evaluated through a typical risk assessment process.</p>		
	Noise	<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. 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. 	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.

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		<p>9. Noise suppression measures must be applied to all equipment. Equipment must be kept in good working order and where appropriate fitted with silencers which are kept in good working order. Should the vehicles or equipment not be in good working order, the Contractor may be instructed to remove the offending vehicle or machinery from the site.</p> <p>10. The Contractor must take measures to discourage labourers from loitering in the area and causing noise disturbance. Where possible labour shall be transported to and from the site by the Contractor or his Sub-Contractors by the Contractors own transport.</p> <p>11. Implementation of enclosure and cladding of processing plants.</p> <p>12. Applying regular and thorough maintenance schedules to equipment and processes. An increase in noise emission levels very often is a sign of the imminent mechanical failure of a machine.</p>		
	<p>Impact on potential cultural, heritage artefacts & paleontological aspects</p>	<p>Heritage:</p> <p>For the current study, the following mitigation measures are proposed, to be implemented only if any of the identified sites or features are to be impacted on by the proposed development activities:</p> <ul style="list-style-type: none"> • (1) Avoidance/Preserve: This is viewed to be the primary form of mitigation and applies where any type of development occurs within a formally protected or significant or sensitive heritage context and is likely to have a high negative impact. This measure often includes the change / alteration of development planning and therefore impact zones in order not to impact on resources. The site should be retained in situ and a buffer zone should be created around it, either temporary (by means of danger tape) or permanently (wire fence or built wall). Depending on the type of site, the buffer zone can vary from 	<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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		<ul style="list-style-type: none"> • 10 metres for a single grave, or a built structure, to • 50 metres where the boundaries are less obvious, e.g. a Late Iron Age site. <p>(2) Archaeological investigation/Relocation of graves: This option can be implemented with additional design and construction inputs. This is appropriate where development occurs in a context of heritage significance and where the impact is such that it can be mitigated. Mitigation is to excavate the site by archaeological techniques, document the site (map and photograph) and analyse the recovered material to acceptable standards. This can only be done by a suitably qualified archaeologist.</p> <ul style="list-style-type: none"> • This option should be implemented when it is impossible to avoid impacting on an identified site or feature. • This also applies for graves older than 60 years that are to be relocated. For graves younger than 60 years a permit from SAHRA is not required. However, all other legal requirements must be adhered to. <ul style="list-style-type: none"> ▪ Impacts can be beneficial – e.g. mitigation contribute to knowledge <p>3) Rehabilitation: When features, e.g. buildings or other structures are to be re-used. Rehabilitation is considered in heritage management terms as an intervention typically involving the adding of a new heritage layer to enable a new sustainable use.</p> <ul style="list-style-type: none"> • The heritage resource is degraded or in the process of degradation and would benefit from rehabilitation. • Where rehabilitation implies appropriate conservation interventions, i.e. adaptive reuse, 		
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		<p>repair and maintenance, consolidation and minimal loss of historical fabric.</p> <p>Conservation measures would be to record the buildings/structures as they are (at a particular point in time). The records and recordings would then become the 'artefacts' to be preserved and managed as heritage features or (movable) objects.</p> <p>This approach automatically also leads to the enhancement of the sites or features that are re-used.</p> <p>(4) Mitigation is also possible with additional design and construction inputs. Although linked to the previous measure (rehabilitation) a secondary though 'indirect' conservation measure would be to use the existing architectural 'vocabulary' of the structure as guideline for any new designs.</p> <ul style="list-style-type: none"> o The following principle should be considered: heritage informs design. <ul style="list-style-type: none"> ▪ This approach automatically also leads to the enhancement of the sites or features that are re-used. <p>• (5) No further action required: This is applicable only where sites or features have been rated to be of such low significance that it does not warrant further documentation, as it is viewed to be fully documented after inclusion in this report.</p> <ul style="list-style-type: none"> o Site monitoring during development, by an ECO or the heritage specialist are often added to this recommendation in order to ensure that no undetected heritage/remains are destroyed. <p>Palaeontology:</p> <ul style="list-style-type: none"> • If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find. 		
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		<ul style="list-style-type: none"> • The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates. • A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates. • Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found. <p>Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.</p> <ul style="list-style-type: none"> • The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find. • In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the 		
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		<p>ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.</p> <ul style="list-style-type: none"> Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area. 		
Waste Management		<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. 	Duration of operation	The implementation of the recommended mitigation measures will result in the minimisation of impacts to acceptable standards, thereby ensuring compliance with NEMA and Duty of Care as prescribed by NEMA.

		<p>9. A certificate of disposal shall be obtained by the Contractor and kept on file, if relevant.</p> <p>10. Under no circumstances may solid waste be burnt on site.</p> <p>11. All waste must be removed promptly to ensure that it does not attract vermin or produce odours.</p> <p>Hazardous waste</p> <p>12. All waste hazardous materials must be carefully stored as advised by the ECO, and then disposed of offsite at a licensed landfill site, where practical. Incineration may be used where relevant.</p> <p>13. Contaminants to be stored safely to avoid spillage.</p> <p>14. Machinery must be properly maintained to keep oil leaks in check.</p> <p>15. All necessary precaution measures shall be taken to prevent soil or surface water pollution from hazardous materials used during construction/prospecting and any spills shall immediately be cleaned up and all affected areas rehabilitated.</p> <p>Sanitation</p> <p>16. The Contractor shall install mobile chemical toilets on the site.</p> <p>17. Staff shall be sensitised to the fact that they should use these facilities at all times. No indiscriminate sanitary activities on site shall be allowed.</p> <p>18. Toilets shall be serviced regularly and the ECO shall inspect toilets regularly.</p> <p>19. Toilets should be no closer than 50m or above the 1:100 year flood line from any natural or manmade water bodies or drainage lines or alternatively located in a place approved of by the Engineer.</p> <p>20. Under no circumstances may open areas, neighbours fences or the surrounding bush be used as a toilet facility.</p> <p>21. The construction of "Long Drop" toilets is forbidden, but rather toilets connected to the sewage treatment plant.</p>		
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		<p>22. Potable water must be provided for all construction staff.</p> <p>Remedial actions</p> <p>23. Depending on the nature and extent of the spill, contaminated soil must be either excavated or treated on-site.</p> <p>24. Excavation of contaminated soil must involve careful removal of soil using appropriate tools/machinery to storage containers until treated or disposed of at a licensed hazardous landfill site.</p> <p>25. The ECO must determine the precise method of treatment for polluted soil. This could involve the application of soil absorbent materials as well as oil-digestive powders to the contaminated soil.</p> <p>26. If a spill occurs on an impermeable surface such as cement or concrete, the surface spill must be contained using oil absorbent material.</p> <p>27. If necessary, oil absorbent sheets or pads must be attached to leaky machinery or infrastructure.</p> <p>28. Materials used for the remediation of petrochemical spills must be used according to product specifications and guidance for use.</p> <p>29. Contaminated remediation materials must be carefully removed from the area of the spill so as to prevent further release of petrochemicals to the environment and stored in adequate containers until appropriate disposal.</p>		
Water Use and Quality	Water pollution	<p>Water Use</p> <p>1. Develop a sustainable water supply management plan to minimise the impact to natural systems by managing water use, avoiding depletion of aquifers and minimising impacts to water users.</p> <p>2. Water must be reused, recycled or treated where possible.</p> <p>Water Quality</p> <p>3. The quality and quantity of effluent streams discharged to the environment including</p>		

		<p>stormwater should be 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. 		
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		<p>14. There should be a periodic checking of the site's drainage system to ensure that the water flow is unobstructed.</p> <p>15. If a batching plant is necessary, run-off should be managed effectively to avoid contamination of other areas of the site. Untreated runoff from the batch plant must not be allowed to get into the storm water system or nearby streams, rivers or erosion channels or dongas.</p> <p>Groundwater resource protection</p> <p>16. Process solution storage ponds and other impoundments designed to hold non fresh water or un-treated process effluents should be lined and be equipped with sufficient wells to enable monitoring of water levels and quality.</p> <p>17. Prevent dirty water runoff from leaving the general mining area;</p> <p>18. Compact the base of dirty areas, like the workshops and oil and diesel storage areas to minimise infiltration of poor-quality water to the underlying aquifers;</p> <p>19. Enough supply of absorbent fibre should be kept at the site to contain accidental spills;</p> <p>20. Contain dirty water in return water dams and re-use dirty water for dust suppression and make up water in the plant;</p> <p>21. Proper storm water management should be implemented. Berms should also be constructed to ensure separation of clean water and dirty water areas;</p> <p>22. A detailed mine closure plan should be prepared during the operational phase, including a risk assessment, water resource impact prediction etc. as stipulated in the DWS Best Practice Guidelines. The implementation of the mine closure plan, and the application for the closure certificate can be conducted during the decommissioned phase</p> <p>Sanitation</p>		
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		<p>23. Adequate sanitary facilities and ablutions must be provided for construction workers (1 toilet per every 15 workers).</p> <p>24. The facilities must be regularly serviced to reduce the risk of surface or groundwater pollution.</p> <p>Concrete mixing</p> <p>25. 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>26. 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>27. 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>28. No washing or servicing of vehicles on site.</p> <p>Infrastructure</p> <p>29. Infrastructure should adhere to the GN704 of the South African National Water Act (36 of 1998) and not be located within the 1:100- year Return Period flood line. This is essential for the safety of human life as well as for the protection of infrastructure from flood inundation and destruction.</p>		
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Mechanisms for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon, including

G. MONITORING OF IMPACT MANAGEMENT ACTIONS

H. MONITORING AND REPORTING FREQUENCY

I. RESPONSIBLE PERSONS

J. TIME PERIOD FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS

K. MECHANISM FOR MONITORING COMPLIANCE

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL 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 Diamonds (Alluvial, in Kimberlite & General) – excavations	Loss of topsoil Erosion Air Pollution Noise Impact on potential cultural and heritage artefacts	<ul style="list-style-type: none"> Conduct regular internal audits Conduct regular external audits 	<ul style="list-style-type: none"> Environmental Manager Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports should be made available to the competent authority if required.
Waste management	Pollution	<ul style="list-style-type: none"> Conduct regular internal audits Conduct regular external audits 	<ul style="list-style-type: none"> Environmental Manager Suitable qualified environmental auditor 	Monitoring should be undertaken for duration of operations. Internal audits should be undertaken at least every 6 months. External audits should be undertaken by a suitably qualified auditor on an annual basis. Reports

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

L. A PROGRAM FOR REPORTING ON COMPLIANCE, TAKING INTO ACCOUNT THE REQUIREMENTS AS BY THE REGULATIONS;

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.

M. AN ENVIRONMENTAL AWARENESS PLAN DESCRIBING THE MANNER IN WHICH—

- (i) **Manner in which the applicant intends to inform his or her employees of any environmental risk which may result from their work.**

Mopane Tree SA (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

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

Mopane Tree SA (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.

**N. 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.

*****END OF THE REPORT*****