## OVERVLAKTE EIENDOM (PTY) LTD – SEMPLE DAM

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TITLE:

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**ISSUE**:

Draft Environmental Impact Assessment Report (Version 1)

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## **Executive Summary**

Noordgrens Boerdery owner of the farm Overvlakte 125 MS requested Tua Conserva Environmental & Conservation (Pty) Ltd to undertake an Environmental Impact Assessment (EIA) for the proposed extension of the existing Semple dam. The EIA Report fulfills the basic principles of Integrated Environmental Management (IEM) and has been conducted in compliance with the latest environmental legislation. The intention is to satisfy the Environmental Authorities and to present a document with relevant information to assist LEDET in their assessment of this project. These together with the motivation for the project are essential to justify the need for the development activity and to help accommodating some of the public and stakeholders concerns, through an Interested and Affected Parties Process.

The idea of the extension of the existing Semple dam is to be able to store the allocated water rights that the developer has from Department of Water and Sanitation. The specific location of Semple dam makes it possible that the dam can be extended to accommodate the volumes. Out of a planning perspective this makes sense financially and also for management of the water. What however has to be tested is the ability of the receiving environment to accommodate the development and also to assess alternative sites or options.

The dam will consist of a zoned earth fill embankment. The extension of Semple dam will have a storage capacity of approximately 3 150 000 million cubic meters. The dam will be used for the storage of water from the Limpopo River that will be pumped during high flow periods. The dam will be registered with Department of Water Affairs for agricultural purposes only. Interested and affected parties could be divided in two categories, the first are those from surrounding farms and secondly MC Mining. Issues and concerns raised by the first category were inclined towards water and biodiversity. The second category was more inclined to the effect the development will have on the possible influence on the option that MCM hold on a portion on which the dam will be developed. Thirdly is there issues related to archaeological sites.

The objective of constructing a dam is to use is as a storage dam in which water during high flow peaks are pumped from the Limpopo river to be used during low flow periods. Water from the catchment area (59.1km<sup>2</sup>) of the unnamed drainage line will also be stored. This drainage line only flow when it storms and is called ephemeral drainages. Currently the irrigation water is subtracted from some 41 sandpit-and borehole extraction points situated in the Limpopo River or on the riverbank. The arrangement of storage of water in impoundments as described by Freeman (2005), see below, will ensure a better quality of water and also lessen the pressure on the ecological reserve of the Limpopo river in the drier periods (read as low flow periods).

Freeman (2005) described the supply of water as follows......"South Africa gets a large portion of its water supply from its rivers, and the amount of water that is present in our rivers varies greatly from time to time, causing the supply to be unreliable. There are two main ways in which this variability of supply can be managed. One, is to store river water and control how and when it is released. The other, is to transfer river water from an area that has an abundant supply, to an area that has very little. River water is stores or "impounded" when a dam is built on a river; it is transferred in something called an "interbasin transfer scheme" (IBT)". It is the same approach that Noordgrens Boerdery follows to provide water for their farming activities.

There are three strategic issues that should be considered in this application. Firstly is the using of water in a sustainable way ensuring sustainable food production. Secondly the process has an off-set that can also benefit the ecological processes of the Limpopo River. Thirdly is that more water will reach downstream waterusers, such as Musina Municipality. Holistically the above three strategic issues combine in a collective front against the pressures on the areas environmental resources.

The impact of the dam and the inundation area will have an impact on habitat, fauna, vegetation-and cultural resources most of which can be mitigated plus the off-set by subtracting less water in the low-flow period of the river and thus pacing less stress on the riparian vegetation and the ecological reserve for the river. Also will the downstream availability of water be more secure in the low flow period.

In the final comment period by interested and affected parties no critical comments was received. MC Mining support the proposed project as forwarded in this report. Musina Municipality also supports the project as well as the adjoining farmers.

The area surveyed for this application was previously assessed for the mining activities. An environmental authorisation was issued for the mining activities.

# DRAFT ENVIRONMNETAL IMPACT REPORT FOR PROPOSED EXPANSION OF THE SEMPLE DAM ON RESTANT OF THE FARM OVERVLAKTE 125 MS, MUSINA LOCAL MUNICIPALITY WITHIN VHEMBE DISTRICT, LIMPOPO PROVINCE

LEDET Project registration no: 12/1/9/2-V64 NEAS Ref no: LIM/EIA/0000549/2018

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## ABBREVIATIONS

LEDET	Department of Economic Development, Environment and Tourism		
	Limpopo province		
DWS	Department of Water and Sanitation		
EIA	Environmental Impact Assessment		
EMP	Environmental Management Plan		
I&AP	Interested & Affected Parties		
LIHRA	Limpopo Heritage Resources Agency		
MCM	MC Mining		
SAHRA	South African Heritage Association		
SWP	Standing Working Procedure		
TFCA	Trans Frontier Conservation Area		

DRAFT ENVIRONMNETAL IMPACT REPORT FOR PROPOSED EXPANSION OF THE SEMPLE DAM ON RESTANT OF THE FARM OVERVLAKTE 125 MS, MUSINA LOCAL MUNICIPALITY WITHIN VHEMBE DISTRICT, LIMPOPO PROVINCE Project registration number: 12/1/9/2-V64 NEAS REF: LIM/EIA0000549/2018

## 1 INTRODUCTION

## 1.1 General

This report contains the results of an on-site investigation for the proposed expansion dam as mentioned in the application for authorization in terms of Regulation 983, Listing Notice 1, Activity 48(iv), 50 and 66. Regulation 984, Listing Notice 2, Activity 15 and Regulation 985 Listing Notice 3, Activity 23 (i)(a) of the National Environmental Management Act, 1998 (Act no. 107 of 1998) and in respect the assessment process applicable.

## 1.2 Project objective

The Environmental Impact Report (EIR) was done to supply the Department of Economic Development, Environmental and Tourism (LEDET) with the necessary information to make a decision regarding the EIR and the issuing of an environmental authorisation.

1.3 Applicant and developer

Noordgrens Landgoed (Pty) Ltd. Represented by Mr W.A. Dillman Contact: Tel: 015-533 3007/6/8 Fax: 086 693 0972 Cell: 083 488 5522 E-mail: noordgrens@lantic.net

## 1.4 Information on EAP

1.4.1 Details of EAP
 Tua Conserva Environmental and Conservation Services cc
 P. O. Box 960
 FAUNA PARK

#### POLOKWANE

0787

Represented by: Mr. J. Claassens

Contact : Cell: 082 885 9118

E-mail: tuaconserva@gmail.com

#### 1.4.2 Experience of EAP

Mr. Claassens is a South African-based career nature conservationist with 43 years' experience in Southern Africa, e.g. South Africa, Botswana, Zambia, Namibia (Eastern-Caprivi) and Mozambique. He has two relevant tertiary- and one postgraduate qualification in Conservation-, Game and Veld Management as well as Public Administration.

Mr Claassens worked for 23 years in governmental Conservation, Environmental and Tourism institutions. His current and past scope of work includes conducting Scoping and Environmental Impact Assessments (Housing, Water supply, Electricity supply, Road structures, Industrial development, Land reform and farming projects for successful land claims), as well as State of the Environment Assessments (SoeR), Environmental Spatial Development Framework, Strategic Environmental Assessments, Project Management and Ecological-and Conservation Management Surveys with management plans. A CV is attached.

# 2 LEGAL AND POLICY REQUIREMENTS

INTERNATIONAL				
ATURAL RESOURCES	Convention to Combat Desertification (CCD)	<ul> <li>The United Nations Convention on the Combating of Desertification defines land degradation as the : "reduction or loss of the biological or economic productivity and complexity of rain fed cropland, irrigated cropland or range, pasture, forest and woodlands in arid, semi-arid and dry sub-humid areas, resulting from land uses or from a process or combination of processes, including processes, arising from human activities and habitation pattern, such as the:</li> <li>long-term loss of natural vegetation;</li> <li>soil erosion caused by wind/water, and</li> <li>deterioration of the physical, chemical and biological or economic properties of soil.</li> </ul>		
ENVIRONMENT AND NATURAL RESOURCES	Convention on Biological Diversity (CBD)	The CBD aims to effect international co-operation in the conservation of biological diversity and to promote the sustainable use of living natural resources worldwide. Membership of this convention has led to the publication of the White Paper on the Conservation, and Sustainable Use of South Africa's Biodiversity (DEAT 1997), which aims to ensure the sustainable use of biodiversity in all sectors, including industry (DEAT 1999).		
	NATI	ONAL		
	The Constitution of South Africa (Act 108 of 1996).	Introduces a Constitutional framework for post 1974 South Africa. Chapter 2;		
		Environment:		
CONSTITUTIONAL RIGHTS		Section 24: Everyone has the right- a. to an environment that is not harmful to their health or well-being; and b. to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that : i. prevent pollution and ecological degradation; ii. promote conservation; and iii. secure ecologically sustainable development and u of natural resources while promoting justifiable economic and soc development. Justice Administrative Action Section 33		

	National Environmental Management Act (Act No. 107 of 1998) (NEMA)	<ul> <li>The State must respect, protect, promote and fulfil the social, economic and Environmental rights of everyone and strive to meet the basic needs of previously disadvantaged communities;</li> <li>sustainable development requires the integration of social, economic and environmental principles.</li> </ul>
		<ul> <li>everyone has the right to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that –</li> </ul>
		<ul> <li>prevent pollution and ecological degradation;</li> </ul>
ES		promote conservation.
ENVIRONMENTAL , CONSERVATION AND NATURAL RESOURCES	National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)	The Waste Act promote effective waste management practices through the promotion of the waste management hierarchy which prioritises waste avoidance, reuse, recycling, recovery and treatment, and disposal as a last resort.
ATU	National Environmental Management:	The objectives of this Act are –
N D	Biodiversity Act (Act No. 10 of 2004)	(a) within the framework of the National
N AN		Environmental Management Act, to provide for –
TIOL		
ISERVA		<ul><li>(i) the management and conservation of biological diversity;</li></ul>
CON		(ii) the use of indigenous biological resources
TAL,		in a sustainable manner; and
IRONMEN		(iii) the fair and equitable sharing among stakeholders of benefits arising.
INN	NEMA	The objectives are to reduce the rate of ecosystem
-	Threatened Ecosystems in South Africa	and species extinction. This includes further degradation and loss of structure, function and
		composition of threatened ecosystems. The purpose
		of listing protected ecosystems is primarily to preserve witness sites of exceptionally high
		conservation value.
	Environmental Conservation Act No 73 0f 1989	<ul> <li>Waste disposal practices (S20)</li> </ul>
		✤ National Noise Control Regulations (GN R154
		dated 10 January 1992)
	National Heritage Resources Act 25	<ul> <li>Stipulates assessment criteria and categories of</li> </ul>
	of 1999	heritage resources according to their
		significance (S7)
		<ul> <li>Provides for the protection of all archaeological</li> </ul>
		and palaeontological sites, and meteorites

	(\$35)
	Provides for the conservation and care of cemeteries and graves by SAHRA where this is not the responsibility of any other authority (S36)
	Lists activities which require developers any person who intends to undertake to notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development (S38)
	Requires the compilation of a Conservation Management Plan as well as a permit from SAHRA for the presentation of archaeological sites as part of tourism attraction (S44)
The National Water Act (Act No. 36 of 1998) National Forests Act (Act No. 84 of 1998)	The National Water Act is important because it provides a framework to protect the natural water resources against over exploitation and to ensure that there is water for social and economic development and water for the future (DWA). Water resources are water bodies such as rivers, streams, wetlands, estuaries and groundwater. The National Water Act aims to protect, use, develop, conserve, manage and control water resources as a whole. Rivers, dams, wetlands, the surrounding land, groundwater, as well as human activities that influence them, will be managed as one cycle. One of the principles of the Act is sustainability which includes ensuring that the environment is protected. Natural forests and woodlands form an important part of that environment and need to be conserved and developed according to the principles of sustainable management; Parliament therefore enacts the following law: <i>Prohibition of destruction of natural forests and the</i> <i>destruction of indigenous trees in any natural</i>
National Veld and Forest Fire Act	forest. Prohibition on destruction of trees in natural forests Regulates veld and forest fires
Animal Diseases and Parasites Act No 35 of 1984	This act prescribes the controls to be implemented for diseases designated by the act or its amendments as "controlled" (e.g. Animal Disease Control disease), or any disease not currently present in South Africa. The Directorate of Veterinary Services of the Department of Agriculture is responsible for the implementation of the controls laid down in the act.
Conservation of Agricultural Resources Act (Act No. 43 of 1983)	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 ar the combating of weeds and invader plants.	
Fencing Act No 31 of 1963		Fencing Act No 31 of 1963	Regulates all matters relating to fencing	
		PROV	INCIAL	
ENVIRONMENTAL &	CONSERVATION	Limpopo Environmental Management Act No 7 of 2003 (LEMA)	Regulates provincial conservation issues	

## 3 DESCRIPTION OF PROPOSED ACTIVITY

## 3.4 Project locality

The project is situated approximately 61 kilometres west of Musina, on the Restant of the farm Overvlakte 125 MS, in the district of Vhembe in the Limpopo Province.

The proposed new Semple dam will be situated in an unnamed ephemeral watercourse, a tributary of the Limpopo River.

The co-ordinates (WGS84) of the proposed dam site are Latitude 22° 10' 7.98" and Longitude 29° 37'7.32".

Locality Map is attached as Appendix A.

## 3.5 Description of activity

A description of work to be carried out can be summarized as follows with the Main Features supplied in Fig.1 (as taken from Preliminary Design Report paragraph 2 attached as Appendix B1):

- Raising of existing embankment by providing additional backfilling on the downstream side and top of the crest for approximately 970m.
- Forming of a new embankment with cut-off core trench for approximately 1500m.
- New main flood spillway on right bank (open side channel) to accommodate the design flood discharge.
- New emergency spillway on left bank (open side channel) to accommodate extra design flood discharge.
- Installation of a new 400 mm diameter Class 9 uPVC outlet pipe encased in reinforced concrete, equipped with closing mechanisms on the downstream sides
- Installation of toe drains with V-notch measuring structures
- Grass establishment (hydro-seeding) on entire embankment after construction

Type of dam	Zoned Earth-fill structure	
Level of non-overspill crest (NOC)	508.00 m	
Full supply level	506.00 m	
Total freeboard	2 m	
Maximum wall height	14 m	
Main Spillway: Type of spillway	Side Channel Spillway	
Main Spillway width	30 m	
Emergency Spillway: Type of spillway	Side Channel Spillway	
Emergency Spillway width	115 m	
Crest width	4.0 m	
Embankment length	2 615 m	
Upstream slope gradient	1(V):3,0 (H)	
Downstream slope gradient	1(V):2,0 (H)	
Storage capacity	4 695 794 m <sup>3</sup>	
Water surface area at FSL	1 054 132 m <sup>2</sup>	

Figure 1: Main Features after proposed expansion of Semple Dam

#### 4. DESCRIPTION OF THE ENVIRONMENT THAT MAY BE AFFECTED

4.1 Present environment

#### 4.1.1 Landuse

Overvlakte 125 MS: Citrus and Game farm

## 4.1.2 Topography

The development falls within the Limpopo river valley. The topography is relatively flat with low sandstone hills parallel to the Limpopo River and shallow valleys to the south that drains the inland plateau.

The site has a drop from south to north.

### 4.1.3 Climate

The project falls within the Northern Arid Climate Region. It is described as lower than average (300 - 500 mm p.a.) and somewhat erratic precipitation for the Savanna type regions, with semi-arid and hot conditions in the Limpopo and Olifants River basins. Rainy season lasts from about November to March, with the peak falling in January. Winds are light to moderate and blow mostly from the north-eastern sector. Almost frost free.

### 4.1.4 Regional Geology

The geology of the area in the immediate vicinity of the proposed dam wall is characterized mainly by alluvial soil. The hill's Lithology is described as fine grained whitish to pinkish and red mottled argillaceous sandstone of the Clarens formation in the Karoo Supergroup (1:250 000 Geological Series: 2228 Alldays). Alluvial soils are found in the low lying drainage lines with sandy soils on the higher lying areas.

### 4.1.5 Soil characteristics

The site is covered with a 50 to 300mm dark reddish to reddish brown sandy soil with roots. The reddish sandy gravel soil is underlain by Metaquartzite which is part of the Beit Bridge Complex.

#### 4.1.6 Biological aspects

4.1.6.1 Vegetation

Biome: Savannah

Physiographic region: Limpopo valley

Veldtype: Acocks Veld Type no. 15, which is classified as Mopane veld. This Veldtype is well represented in declared conservation areas as well as private game farms.

#### 4.1.6.2 Fauna

The project area, as a whole, has in effect been utilised (human interference) over a period of time due to:

- ➢ Farming activities;
- Erection of fences;
- Development of infrastructure;
- Human settlement;

## ➢ Military activities.

This isolation resulted in the disruption of natural and historic migration (macro- and micro) of larger, medium and smaller mammals. The small mammal species were able to survive in small quantities in relation to the available habitat and external impacts. Larger herbivores were reintroduced by the current owner after erection of game fences according to exemption specifications. Larger carnivores include leopard.

## 5. PUBLIC PARTICIPATION PROCESS

## Appendix C

5.1 Objectives of public involvement program

The objectives of the Public Involvement Program were to:

- Inform IAPs and authorities and obtain their concerns, attitudes and perceptions.
- Provide an opportunity for IAPs to identify alternatives.
- Ensure that the IAPs concerns, attitudes and perceptions are addressed in the study.

### 5.2 List of interested and affected parties

Documentation related to the Interested and Affected Parties process were attached to the Draft Scoping Report & Plan of Study.

The interested parties can be categorized in the following groups e.g.:

- D Musina Local Municipality Environmental Management
- D Vhembe District Municipality Environmental section
- □ MC Mining;
- Department of Water Affairs;
- Department of Agriculture, Forestry and Fisheries;
- □ Farming neighbours.
- Department Economic Development, Environment and Tourism;
- □ SANDF
- □ SAHRA/LIHRA

## 5.3 Interested parties process

The broad aim of the public involvement process is to provide interested and affected parties (I&AP), authorities and specialist interest groups the opportunity to identify

issues and concerns regarding the development of new resort projects. The participation process also assists in the identification of ways in which concerns can be addressed and alternatives considered.

5.4 Approach to Public Involvement Program

The Public Involvement Programme was undertaken as illustrated in the following flow diagram:

Table 1: Process foll			
ACTION	METHOD	DATE & TIME	RESULTS
Advertisements: News	A notice was placed in	1 <sup>st</sup> December 2017	Original copies of
Paper	the main body of the		advertisements was
	Zoutpansberger.		included in the Draft
			Scoping & Plant of
			Study report.
			Response received:
			None
Advertisements:	Posters:	Attached on the 7 <sup>th</sup>	Response received:
Notices	• Musina Local	December 2017	None
	Municipality		Original copies were
	• Entrance to		included in die Draft
	Noordgrens		Scoping Report & Plan
	Landgoed		of Study.
	• Entrance road to		
	dam		
Notifications to I&AP	Notifications were send	29/11/2017	Response received by
	by e-mail. Refer to	30/11/2017	e-mail. Has been listed
	register	5/2/2018	in register.
			Original copies were
			included in die Draft
			Scoping Report & Plan
			of Study.
Public Meeting	Letters of invitations	31/01/2018	Response was received
	were send by:	5/02/2018	by e-mail. See
	• E-mail	9/02/2018	response Register.
	Open meeting was held	21 February 2018	Minutes has been kept.

	at the office of		Attendance register has
	Noordgrens Landgoed		been kept. Was
	(Pty) Ltd., Co-ordinates		distributed to I%AP's,
	were supplied.		refer to Register.
	Refer to Register		Comments were
			received from Mr J.
			Sparrow from MC
			Mining.
			See Response Register
			Original copies were
			included in die Draft
			Scoping Report & Plan
			of Study.
Draft Scoping & Plan	Distributed to:		Only one response was
of Study	- Registered	14 <sup>th</sup> March 2018	received from Musina
	I&AP's	16 <sup>th</sup> March 2018	Local Municipality.
	- LEDET		A copy of the letter as
			well as the Registers
			will be attached to the
			Draft EIA report.

The whole Public Participation Process were included in the Draft Scoping Report & Plan of Study.

5.4 Draft Scoping Report & Plan of Study

The Scoping report was send by e-mail on 14<sup>th</sup> March 2018 to the following parties:

- Mr J. Sparrow & F. Chauke MC Mining
- Mr PMJ Verwey & J. Steenkamp DAFF
- Me Taka Mihloti DWS
- Lt.Col. D.C. Moore SANDF
- Mrs R. Kutama Musina Local Municipality
- Mr A.S. Mulibana Vhembe District Municipality
- Mr J. Willemse, mr J. Pretorius & mr P. Esterhuyse Neigbouring farmers

See attached Register of Report send - Appendix C1

- 5.5 Comments on Draft Scoping Report & Plan of Study Only one comment was received from Musina Local Municipality. See attached Register of Response. Appendix C1.
- 5.7 Submission of Draft Environmental Impact Report See attached Register of Submission of Draft EIA report: Appendix C2.

#### 6. NEED AND DISERABILITY OF ACTIVITY

The Limpopo River is currently used as water source for a wide spectrum of water users that starts in the west. The water users include farming, starting in North-West Province, all along the river (irrigation), mining and electricity in the west (Thabazimbi and Lephalale region), mining at Venetia, with Musina Local Municipality also a prominent water user downstream. Vegter (2001, p3) mentions that Region 3: Limpopo Granulite\_gneiss Belt "....is practically solely dependent on groundwater." And later on"...Musina town obtains its water supply from wells in the sand of the Limpopo river." Colvin et. al. (June 2007, p24) mentions that "...Aquifer Dependent Ecosystems health (ADE) is in particular important in this trans-boundary area where it forms an important keystone ecosystem. There is also growing demand for water for human-use and irrigation from this internationally shared aquifer and the main water source is the groundwater in the alluvial aquifer."

In Table 1 below the sources of water and the total Annum Allocation is supplied.

Figure	2:	Water	Source	Breakdown
I Igui c		i i utti	boulter	Dicunation

		SOURCE	
PROPERTY	SURFACE	BOREHOLE	TOTAL
			m³/ANNUM
Overvlakte	1 526 320	381 580	1 907 900
Semple	1 031 710	6 554 397	7 586 107
Noordgrens	847 553	882 147	1 729 700
TOTAL m³/ANNUM	3 405 583	7 818 124	11 223 707
Percentage of water /source	30.34%	69.66%	

Noordgrens Boerdery has experienced the Limpopo River as a farming enterprise in many forms, from droughts to floods. Noordgrens Boerdery need water in quantity and quality and their experience forced them to ensure a constant supply of water, an offset for Noordgrens Boerdery is that the dam will also collect water from the catchment of the unnamed watercourse. This approach is further divined by that they will store the water in the proposed expansion of Semple dam so that it is available throughout the year, especially during the winter. The storage of the water will be from the primary source, Limpopo River, when they will pump water when the river is in high flood. A secondary source is the well-field. Water from rain in the catchments area will also contribute (off-set), as tertiary source (although considered as insignificant), to the storage of water in the dam. This approach will result that water is available for irrigation in the winter and early summer periods. The seasonal demand for water supply-and needs is important when there is no surface flow in the Limpopo River and

water is subtracted from the sub-surface water thus placing stress on the ADE of the Limpopo river. Also in this period is the irrigation of citrus important.

## 7. CONSIDERATION OF ALTERNATIVES

#### PROCESS IMPLEMENTATION

Key criteria when identifying alternatives are that they should be "practicable", "feasible", "relevant", "reasonable" and "valuable".

The above was attained by and/or during:

- Pre-feasibility stage
- Map evaluation based on task parameters
- Site visits with team members
- Consultation with interested and affected parties
- Environmental field surveys
- Design options
- Economic/cost implications
- Measuring against attaining primary objective(s)
- 7.1 Activity alternative

	ACTIVITY ALTERNATIVES
KEY WORDS	Activity alternative is also known as project alternative
	PROJECT TEAM INVOLVEMENT
Professional	Role
Engineer	Objectives of:
	• Design;
	• Safety
Client	Use of allocated water storage
	Contribution to agriculture value chain
Environmental	Compliance with biodiversity
	NEMA legislation
	CONSIDERATIONS
Specific considerations	Specific motivation
(i) Keep status quo	Not an option as storage of water is a priority for sustainable farming
(ii) Use groundwater-and/or	• Not an option due to water availability from both sources in late- winter and early summer.

sand-pit pumping stations	• Water quality also is a problem
Motivation	
i) The best way to secure a c	constant source of water of good quality is by storage.
ii) The quality is ensured by	storage.
iii) Water for downstream use	ers is also ensured.
iv) It impacts less on biodive	rsity.

# 7.2 Design alternative

	DESIGN ALTERNATIVES
KEY WORDS	Consideration are construction materials, aesthetics, and attempting to optimise on design to be included and accepted as part of the project description
	PROJECT TEAM INVOLVEMENT
Professional	Role
Professional team	To ensure facilities which comply with legislation and SANS codes
	Environmental objective: Environmental acceptable and compliance
Client and EAP	Measure design alternatives for best option as required for maximum effectiveness and attaining objectives.
Client	Objectives
	<ul><li>(i) Strategic objectives</li><li>• Provide a safe dam for storage</li></ul>
	• Comply with national legislation/standards (ii) Operational objectives
	Maintenance of a soft footprint system infrastructure
	• Water according to quantity and quality needs
CONSIDERATIONS	
Specific considerations	Specific motivation
Design of facilities	Environmental         Prevent negative impacts on receiving environment:         (i)       Minimum removal of natural vegetation;         (ii)       Compliance with animal health
Configuration of facilities	Can be implemented on a footprint without any environmental constraints or parameters by engineering design.
Prevention of erosion	Stormwater design

## 7.3 Location alternative

## LOCATION ALTERNATIVES

KEY WORDS	Consideration are location in area, receiving environment, construction
	materials, aesthetics, and attempting to optimise on design to be included
	and accepted as part of the project description
	PROJECT TEAM INVOLVEMENT
Professional	Role
Client	Compliance with legislation and standards
	High visibility
	Productive use of agriculture land
Professional team	Assess receiving environment for correct placement of location in receiving
	environment
	CONSIDERATIONS
Specific considerations	Specific motivation: Environmental
Location	Comply with Clients needs
Landuse	No change in landuse
Management	Terrain can be managed
Execution of proposal	Approval by LEDET and DWS

## 7.4 Process alternative

	PROCESS ALTERNATIVES
KEY WORDS	Best Practicable Environmental Option (BPEO) in considering alternatives for: • Technology • Equipment PROJECT TEAM INVOLVEMENT
Professional	Role
Client	Obtaining objectives
Environmental	<ul> <li>Environmental objective:</li> <li>Environmental compliance</li> <li>Conservation and biodiversity compliance</li> <li>Best practices during construction phase</li> <li>Best practices during operational phase (maintenance)</li> <li>Ensuring environmental compliance by maintenance programme by implementing an environmental monitoring end compliance plan.</li> </ul>
	CONSIDERATIONS
Specific considerations	Specific motivation
Using technology	Implement an Environmental Management Plan with Monitoring program

## 7.5 No-Go alternative

	NO-GO ALTERNATIVES
KEY WORDS	Also known as the "no-action" alternative.
	It assumes that the activity does not go ahead, implying a continuation of
	the current situation or status quo.
	PROJECT TEAM INVOLVEMENT
Professional	Role
Client	This is not an option as the objectives of storing allocated water will not be
	attained.
Environmental	The receiving environment does not have a high risk factor or constraint
	CONSIDERATIONS
Specific considerations	Specific motivation
National objectives	Compliance with legislation
Socio-economic	Provide security in water supply
	Provide security for jobs in rural areas

## 7.6 Alternatives discussion

The alternatives discussed indicate that the expansion of Semple dam will be a positive contributor to the farming economy, sustainable landuse-, natural resources and rural job security on farm(s).

## 7.6.1 No-go alternative

This option can only be considered if the assessment and/or the other professional studies revealed a fatal flaw in the process and or where no other planning guidelines could correct or mitigate identified issues and/or flaws. The single most important issue is the consent from MC Mining that there is a working agreement for the area that will be inundate of the farm on which they have the mining rights.

## 7.6.2 Demand alternatives

The demand for the dam is motivated by the need of constant water throughout the year and to be able to store the allocated water. The dam will provide the water security needed for providing water in periods with low rain and when Limpopo River is in low flow.

#### 7.6.3 Activity alternatives

Currently water is supplied from sand-pit wells in the Limpopo River and from wells on riverbank from which water is pumped throughout the year. During the winter-and early summer periods this places stress on the water from the river, which is mainly subsurface. There are two alternatives, the first being where the farming activities is stepped down and secondly the building of the dam. The first alternative still places the ecological reserve of the river under stress (more so in low rainfall periods) and also influences the water users downstream, e.g. Musina town and farming downstream. The **second alternative is a holistic approach** where water in peak flow periods is stored for later use and the stress on the Limpopo River relieved in the low flow periods. This is also in the rainfall period which helps to allow more storage of water.

#### 7.6.4 Process alternatives

A smaller dam will not be economically viable in the construction costs as well as retaining sufficient water for the irrigation. The process of pumping water during peak flow periods as well as using run-off water during the rain season is contributing to preserving the rivers ecological reserve sources. Thus the water resource-use is diversified and also ensures that recharge of groundwater takes place.

#### 7.6.5 Location alternatives

The proposed location (expansion) is the only option for placing of the dam which has the minimum impact on the receiving environment and also that will not contribute to sterilise areas.

#### 8. SPECIALIST REPORTS

Below is a list of specialist Reports with abbreviated findings.

8.1 Preliminary Design Report for the Raising of Semple Dam.

This report was compiled by PG Consulting Engineers (Pty) Ltd. Attached as Appendix B (1).

• The Preliminary Design supports the expansion.

Attached to the above Reports and/or maps was also supplied as Appendices, and is listed below:

- 8.1.1 Appendix B1(a): Site Locality
  - The terrain is suitable for the expansion location.
- 8.1.2 Appendix B1(b): Design Drawings
  - The drawings supports the expansion proposal.

- 8.1.3 Appendix B1(c): Flood Hydrological Report of the Proposed Upgraded Semple Dam
  - Supply guidelines for *Recommended Disgn Flood (RDF)* for spillways.
  - Supply guidelines for *Safety Evaluation Discharge (SED)* for Regional Maximum Flood.

Both are related to the water from the ephemeral stream(s).

- 8.1.4 Appendix B1(d): Rubble Masonry Concrete Report
  - Guidelines to be used for construction with material from the site area.
- 8.1.5 Appendix B1(e): Semple Dam Registration and Classification Information
  - Proof of DWS process.
- 8.1.6 Appendix B1(f): Geotechnical Investigation ReportSupply proof of suitable material from site area for construction purposes. Below is an extract of the findings and recommendations:
  - (i) The site "...creates an ideal site for the proposed dam wall....".
  - (ii) Silty clay material from within the dam storage area may be used for construction of dam wall.
- 8.2 Archaeological Report.

8.2.1 This report was compiled by R&R Cultural Resource Consultants. Attached as **Appendix B2.** 

Below is a summary of the findings and recommendations:

- i) From a heritage resources management point of view, there is are provisions that have to be taken before construction.
- ii) A Phase 2 will have to be conducted.
- 8.2.2 Standing Working Plan (SWP): Archaeology
- (i) Attached find the SWP for implementation on the project. Appendix B2(a).

#### 8.3 Ecological-and Red Data Report

This report was compiled by Tua Conserva Environmental & Conservation Services cc. Attached as **Appendix B3**.

Below is a summary of the findings and recommendations:

(i) No Red Data species will be lost.

(ii)Habitat and vegetation will be lost, new water habitat will however be created. It will provide a "reserve" for water associated species.

(iii) That a competent environmental control officer is appointed for the duration of the project. This must be made a condition.

8.4 Water Resource Study- new impoundment for Noordgrens Landgoed

Report compiled by BioAssets and attached as Appendix B4.

- (i) All the streams investigated are ephemeral drainage systems.
- (ii) No wetted areas to support riparian vegetation were found.
- (iii) No fishways are needed due to ephemeral nature of drainage systems.
- (iv) Minimum erosion was observed, irrespective of the aforementioned erosion should still be monitored.
- (v) Water quality must be monitored.
- (vi) An Action Plan: Bank Stabilisation must be formulated for the extraction point on the Limpopo riverbank.
- (vii) Monitoring Plan for the above Action Plan as well as for fish and macro invertebrate are implemented twice a year.
- 8.5 Environmental Management Plan (EMP)

Attached find the EMP for implementation on the project. Appendix B5.

# 9. ADVANTAGES AND DISADVANTAGES OF THE PROPOSED ACTIVITY AND ALTERNATIVES ON THE ENVIRONMENT AND COMMUNITY

- 9.1 Advantages of the proposed activity and alternatives
  - i. The proposed expansion of Semple dam will ensure a constant quality water supply for the current farming activities.
  - ii. The products produced and supplied to the agriculture industry will ensure agriculture produce and related socio-economic benefits for related businesses.
- iii. Both the above points contribute to the socio-economic aspects of the community.

- iv. The proposed new dam will be advantageous as a storage dam where water will be stored to relieve pressure on the Limpopo River system during the dry/or low flow periods.
- v. The dam will create a new open water habitat for fauna and flora species.
- vi. The dam will result in placing less stress on the ecological reserve of the Limpopo River.

#### 9.2 Disadvantages of the proposed activity and alternatives

- i) Natural vegetation will be lost and habitat for species will be lost.
- ii) Protected tree species will be destroyed located on the footprint area.

#### 10. ENVIRONMENTAL IMPACT DETERMINATION AND EVALUATION

10.1 Assessment method

The assessment of impacts will largely be based on DEA's (1998) Guideline Document: EIA Regulations. The assessment will consider impacts arising from the planning, construction and operation phases of the proposed project both before and after the implementation of appropriate mitigation measures. Due to the inherent difficulties involved in attaching significance ratings to impacts, it is proposed that the evaluation of the significance of impacts be done according to the rating system described below.

In any process of identifying and recognizing impacts, one must recognize that the determination of impact significance is inherently an anthropocentric concept. Duinker and Beanlands, (1986) in DEAT 2002. Thompson (1988), (1990) in DEAT 2002 stated that the significance of an impact is an expression of the cost or value of an impact to society.

However, the tendency is always towards a system of quantifying the significance of the impacts so that it is a true representation of the existing situation on site. This will be done by using where ever possible, legal and scientific standards which are applicable. The significance of the aspects/impacts of the process will be rated by using a matrix derived from Plomp (2004) and adapted to some extent to fit this process. These matrixes use the consequence and the likelihood of the different aspects and associated impacts to determine the significance of the impacts. The *consequence matrix* use parameters like *severity, duration* and *extent* of impact as well as *compliance* to standards. Values of 1-5 are assigned to the parameters that are added and averaged to determine the overall consequence. The same process is followed with the *likelihood* that consists of two parameters namely *frequency* and *probability*. The overall consequence and the overall likelihood are then multiplied to give values ranging from 1 to 25. These values as shown in the following table are then used to rank the significance. It must be said however that in the end, a subjective judging of an impact can still be done, but the reasons for doing so must be qualified.

 Table I: Significance ratings (Plomp 2004)

Significance	Low	Low-Medium	Medium	Medium-High	High
Overall					
Consequence					
X Overall	1-4.9	5-9.9	10-14.9	15-19.9	20-25
Likelihood					

	<b>Description of the</b>	parameters	used in	the matrixes
--	---------------------------	------------	---------	--------------

Severity	
Low	Low cost/high potential to mitigate. Impacts easily reversible, non harmful insignificant change/deterioration or disturbance to natural environments.
T	
Low-medium	Low cost to mitigate Small/potentially harmful Moderate change/
Madian	deterioration or disturbance to natural environment.
Medium	Substantial cost to mitigate. Potential to mitigate and potential to
	reverse impact. Harmful Significant change/ deterioration or
	disturbance to natural environment.
Medium-high	High cost to mitigate. Possible to mitigate Great/Very Harmful
	Very significant change/deterioration or disturbance to natural
	environment.
High	Prohibitive cost to mitigate. Little or no mechanism to mitigate.
	Irreversible. Extremely Harmful Disastrous change/deterioration
	or disturbance to natural environment.
Duration	
Low	Up to one month
Low-medium	One month to three months
Medium	Three months to one year
Medium-high	One to ten years
High	Beyond ten years
Extent	
Low	Footprint area
Low-medium	Area directly bordering the footprint area
Medium	Areas adjoining to west, east and south.

Medium-high	Surrounding farming areas/Musina town
High	Regional National and International
Frequency	
Low	Once/more a year or once/more during operation
Low-medium	Once/more in 6 months
Medium	Once/more a month
Medium-high	Once/more a week
High	Daily
Probability	
Low	Almost never/almost impossible
Low-medium	Very seldom/highly unlikely
Medium	Infrequent/unlikely/seldom
Medium-high	Often/Regularly/Likely/Possible
High	Daily/Highly likely/definitely
Compliance	
The following criteria ar	e used during the rating of possible impacts.
Low	Best Practice
Low-medium	Compliance
Medium	Non compliance/conformance to Policies etc-Internal
Medium-high	Non-compliance/conformance to Legislation etc-External
High	Directive, prosecution of closure or potential for non- renewal of licenses or rights.

## 10.2 Aspects, related impacts, significance and proposed mitigation measures

The assessment ordained the issues into main grouping characteristics where after they were assessed. Below is a chronological list of the groupings with the number of issues under each listed which was assessed.

1.	Biophysical Characteristics	:10
2.	Ecological Characteristics	: 5
3.	Current and Potential Land-use Characteristics	:2
4.	Cultural Characteristics	:1
5.	Socio-economic Characteristics	:2
6.	Infrastructure Characteristics	: 3
7.	Pollution Characteristics	:1
8.	Risk and Hazard Characteristics	:1
9.	Health and Safety Characteristics	:0
10.	Cumulative and Synenergistic Characteristics	:1

Assessment start on next page.

#### 1. **BIOPHYSICAL CHARACTERISTICS**

DIODUUGU		amphiamiaa								
		CTERISTICS								
Land: Subst	rata									
PHASE	onstruction									
CONFIDE	NCE	High: Positive								
EXTENT					RISK					
Site Specific	Local	Regional	National		Yes	No				
	PROBA	BILITY			SI	GNIF	<b>ICAN</b>	CE		
Definite	Highly probable	Probable	Improbable	Low	L-M	Me	dium	M-H	High	
	·	STAT	US & INTEN	SITY						
Major		Moderate		Miı	ıor					
+5	+4	+3	+2	+1 Positive						
-5	-4	-3	-2	-1 Negati			ative	tive		
	·	DURATION		FREQUENCY					r	
Transient	Short-term	Medium	Long-term	Perma	anent	High	Med	L	LOW	
			ISSUE							
Nature of su	bstrata found	at project area	l							
		NAT	URE OF IMI	PACT						
Mate	erial not suital	ole for dam-wa	all construction	n						
			FECTED AR							
Footprint for	r project area									
	1 5	Ν	<b>IITIGATION</b>	N:						
Material con	straints:									

An initial Phase 1 Geotechnical survey was conducted and indicated that material is suitable for construction. To further identify suitable material Phase 2 Geotechnical survey will be conducted to identify pockets of material best suitable for construction. A professional company to conduct these surveys and tests has been identified and will be appointed after necessary authorisations have been received.

Recommendations:

(i) Appointment of professional company for further surveying during construction.

(ii) Spoil material to be used in erosion control.

BIOPHYSICAL CHARACTERISTICS									
Land: Erosion									
PHASE									
CONFIDE	NCE								
	EXT	TENT	RISK						
Site Specific	Local	Regional	National	Yes				No	
		BILITY S				GNIFICANCE			
Definite	Highly probable	Probable	Improbable	Low	L-M	Medium N		M-H	High
		STAT	US & INTEN	SITY					
Major		Moderate		Mi	nor				
+5	+4	+3	+2	+1 Positive					
-5	-5 -4 -3 -2					Negative			
		DURATION				FREQUENCY		Y	
Transient	Short-term	Medium	Long-term	Perm	anent	High	Med		Low
			ISSUE						
Erosion									
			URE OF IMP						
Erosion will	degrade the r	eceiving envir			condar	y-and to	ertiary	impa	cts.
		AFF	<b>ECTED ARI</b>	EAS					
What was f					_				
		nt of project a	nd areas linke	d direc	tly or	indirect	ly to the	ne fo	otprint,
	des the follow	U							
	ary spillways								
	rgency spillwa	ay (1);							
	-wall slopes;								
	nnelled water;								
Road	• Roads								
Continue on following page.									



Channelled flow: With the previous design seepage occurred which was channelled which had to be repaired. Remediation measures was taken.

Roads: The roads did not show serious erosion problems.

Dam embankments: The dam-walls were covered with herbaceous growth which stabilised the surfaces with no erosion evident.

## **MITIGATION:**

## Mitigating recommendations:

(i) Spill-ways

- a. The channelled flow (from spill-ways) of surface water must be designed according to engineering stormwater guidelines.
- b. Energy breakers and water dissipaters must be ensure to spread the water over a larger outlet area to prevent scouring of surface.
- (ii) Roads
  - a. The management roads related to the dam area must be designed to prevent erosion.
  - b. Any altered water flow influencing the management roads should be designed to allow for water flow connectivity. Refer to design drawings below. This design will also allow for when the Limpopo River is flood (1:10 year and more).
  - c. During construction roads has to be kept to the footprint. Any deviations on this instruction by the contractor will be penalised; refer to EMP for design.

## (iii)Dam-wall slopes

a. Slopes must to be seeded/planted with *Cynodon* cultivars as on existing damwalls. See image below.



BIOPHYSIC	AL CHARAC	CTERISTICS							
Sense of plac	e in receiving	environment							
PHASE	I								
CONFIDENCEHigh (50-100%)									
EXTENT						RISK			
Site Specific	Local	Regional	National		Yes		No		
	PROB	ABILITY	-		S	IGNIFICAN	ICE		
Definite	Highly probable	Probable	Improbable	Low Low- Medium		Medium	Medium- High	High	
		•	STATUS & I	NTENS	ITY	•			
Major		Moderate		N	Minor				
+5	+4	+3	+2		+1		Positive		
-5 -4 -3 -2				-1		Negative			
		DURAT	ION	-		FREQUENCY			
Transient	Short-term	Medium	Long-term	Per	manent	High	Med	Low	
Т	S	М	L		Р	Н	М	L	
			COMPL	IANCE					
Construction									
Operational:	High								
			ISS	UE					
Wrong placir	ng in receiving	g environment	regards:						
• Lane	duse		-						
• Ster	ilising land								
					and the second s				
T		11 1	NATURE O	F IMPA	CT				
		pproved landus							
• Frag	gmentation of	biological com	munities						
					C				
AFFECTED AREAS									

#### The footprint of the actual structure and direct surroundings used for access and infrastructure BACKGROUND INFORMATION

#### Background information:

The proposed expansion is directly adjoining the actual footprint of existing dam and associated farming infrastructure and has been planned and designed to be integrated with the existing structure of Semple dam. The area has been subjected to human interference since m with a marked increase from the early 1950's. Status before new expansion:

Google images (prior to development and dated back to 2004) indicates that minimum vegetation has been partly removed for infrastructure such as roads, pipelines and parking/id-1940's when farmers was established in the area. The vegetation cannot be considered as pristine due to the above as was confirmed with field surveys.

Large indigenous trees are present in close proximity to the structure indicating that preservation of trees is important to the developer. The vegetation is described as Mopane Bushveld (Low & Rebelo, 1996) with large parts being conserved in various provincial-and national reserves-and parks.

#### What was found:

- (i) The environmental landscape has already been transformed.
- (ii) The footprint area was subjected to human influence over time.
- (iii) Pollution built-up and/or signs of pollutions of significance were not found to be common.
- (iv) The activity is in line with the landuse.
- (v) Where terrestrial habitat was lost (dam water surface area) it was replaced by new aquatic habitat. Which supports various aquatic life forms and associated systems (new populations, food-chains etc)



View of surrounding land-uses

#### What is recommended for mitigation:

- (i) That an aquatic monitoring program for the aquatic habitat is implemented.
- (ii) That the vegetation in the inundated dam is removed to prevent organic matter (decomposing) influencing the water quality.

**MITIGATION:** 

(iii) That the recommendations made in the respective reports are implemented.

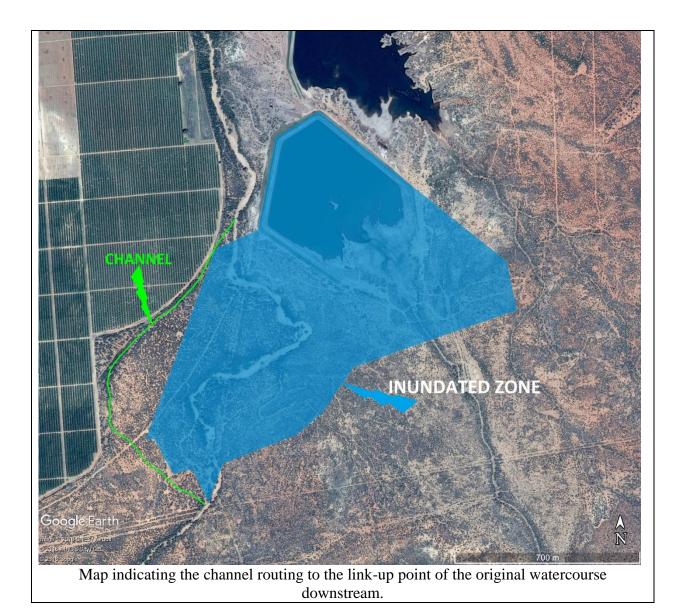
BIOPHYSICAL CHARACTERISTICS									
Sense of p	ace: Location								
PHASE		Construction a	and operational						
CONFID	ENCE	High (50-100	%)						
	EX	TENT				RIS	SK		
Site Specific	Local	Regional	National		Yes		No		
specific	DDOB	ABILITY				SIGNIFI	CANCE		
Definite	Highly	Probable	Improbable	Low	Low-	Mediun		High	
Definite	probable	TTODADIC	Improvable			High	Ingn		
		I	STATUS & IN	TENSIT	Y				
Major		Moderate		Mi	inor				
+5	+4	+3	+2	+1 Positive					
-5	-4	-3	-2	-	-1		Negative		
	~	DURATIO				/	FREQUENC		
Transient	Short-term	Medium	Long-term		nanent	High	Med	Low	
<b>a</b> , , ,			COMPLIA	ANCE					
Construct Operation									
			ISSU	£					
Destruction	n and/or removal	l of vegetation w							
			NATURE OF	IMPAC	Т				
(i) R	emoval of protected s	species							
(ii) D	estruction of Red Da	ta species							
			AFFECTED	AREAS					
The footpr	int of the actual	structure and dir	ect surroundings	s used for	access an	d infrastr	ucture		
			KGROUND IN	FORMA	ATION				
Sense of place	ing in the receiving	<u>environment</u>							
Refer also to	image in previous as	pect.							
The proposed	expansion will be d	irectly adjoining to	the existing Semple	dam.					
The location	is outside of the 1:10	0 floodline of the L	impopo River.						
The vegetation	n that will be affecte	ed is dry-land riparia	n vegetation which	does not dif	fer from the	adjoining N	Iopane woodland.		
There is an e	xisting road infrastru	cture on this portion	of the farm.						
The sense of	location of the project	ct area was found to	be conducive for:						
	inimum disturbance								
	inimum sterilising of	-							
	, in the second s	•	1.						
	inimum fragmentatio	•							
	acing in close proxin								
	inimum impact on re	C	11.						
	otected tree species								
	o Red Data flora or f								
• A	n Archaeological site	e was identified that		2	e 2 excavatio	n.			
(i) Tl	ne high impact zone,	e.g. the dam-wall a	MITIGAT		ted by defini	ng the foots	print area prior to co	nstruction by	
(1) 11	a double strand fo	-			ica oʻj denin			istruction by	
(ii) A	(ii) A proper stormwater plan should be implemented to receive the water from the hardened surfaces and seepage from the dam.								
(iii) Pi	(iii) Protected trees in footprint area can only be removed by a permit from DAFF.								
(iv) Tl	e Phase 2 Archaeolo	ogical excavation sh	ould be completed b	efore constr	ruction can b	e allowed o	n the specific site.		
(v) In	(v) Implement the EMP.								

BIOPHYSIC	CAL CHAI	RACTERISTI	CS						
Freshwater S	Systems: N	atural drainag	e patterns						
PHASE         Construction and operational									
CONFIDE	NCE	High/Positiv	High/Positive						
EXTENT					RISK				
Site Specific	Local	Regional	National	Yes No			0		
	PROI	BABILITY	•	SIGNIFICANCE					
Definite	Highly probable	Probable	Improbable	Low L-M		Medium	M-H	High	
		ST	ATUS & INTE	ENSITY	7				
Major		Moderate		Mi	nor				
+5	+4	+3	+2	+	1	]	Positive		
-5	-4	-3	-2	-	1	Ν	Vegative		
		DURATI	ON			FRF	EQUEN	CY	
Transient	Short- term	Medium	Long-term	Permanent		High	Med	Low	
			ISSUE			1			
Developmen	nt near rive	rs and waterco	ourse (32 m)						
1			ATURE OF IM	IPACT					
Possible imp	bacts on riv	ver/watercours	e banks						
Destruction	of sensitive	e vegetation							
Pollution by	constructi	on activities							
		I	AFFECTED AI	REAS					
Where the p	proposed ex	xpansion of th	ne dam-wall wil	ll cross	the unr	named wat	ercourse	and the	
area of the v	vatercourse	that will be in	nundated.						
			MITIGATIC	DN:					
Status quo:									
The propos	ed project	is ±1,200 m	from the Lim	ipopo R	liver a	nd outside	any rip	oarian-or	
wetland zor	ne. It does	however infl	uence ±1,530 n	n of an	ephem	neral water	course	were the	
watercourse	will be cha	annelled arour	d the footprint a	area.	-				
Recommend	lations for	mitigation:	_						
1. The	watercours	se is channelle	ed to link up w	vith an e	existing	g minor-wa	tercours	se which	
			riginal natural v			-			
			ons are lodged.						
3. That a route as assessed for the channel is surveyed when the construction surveying is									

3. That a route as assessed for the channel is surveyed when the construction surveying is done for the dam.

The expected outcome of mitigation:

Is that the epherical watercourse flow is re-routed to support the watercourse downstream as indicated in the map below.



BIOPHYSICAL CHARACTERISTICS									
Freshwater	systems: Riv	vers and assoc	iated riparian	zones a	and we	tlands			
PHASE		Operational							
CONFIDE	NCE	High-positiv	e						
	EXT	TENT				RISK	2		
Site Specific         Local         Regional         National           PROBABILITY					Yes			No	
		SIGNIFICANCE							
Definite	Highly probable	Probable	Improbable	Low	L-M	Medium	M-H	High	
STATUS & INTENSITY									
Major		Moderate		Mi	nor				
+5	+4	+3	+2	+	1		Positive		
-5	-4	-3	-2	-	1	]	Negativ	e	
		DURATION	N			FR	EQUEN	ICY	
Transient	Short-	Medium	Long-term	Perma	anent	High	Med	Low	
	term								
			ISSUE						
Impacting o	n water flow	affecting wat	ter reaching ri	parian-	and flo	odplains			
		NA	TURE OF IN	<b>IPAC</b>	Γ				
Water extraction from riverbed in low flow periods will lower the available water in the									
streambed as well as in the aquifer which will place water stress on the riparian zone.									
Connectivity of floodwater flow on floodplains is impeded and altered.									

## AFFECTED AREAS

Where development is in close proximity (32m and less) to water courses, riverbanks and floodplains

### **MITIGATION:**

What was found:

The expansion of the dam of the dam is situated outside the riparian zone and floodplains. The extraction point (existing) is situated on the riverbank and is designated a Critical Biodiversity Area (CBA), it is not related to the water resources associated with the proposed site for the proposed expansion of the existing impoundment.

No Red Data flora and fauna species was found with some protected plants.

- Recommendations for mitigation:
  - 1. Normal erosion prevention measures on the road to the proposed project area.
  - 2. Implement any measures as described in the EMP.

		ACTERISTIC	S						
Freshwater s	systems: Wa	ter quality							
PHASE		Operational							
CONFIDE	NCE	High							
	EXT	TENT				RISI	X		
Site Specific	Local	Regional	National		Yes			No	
		BILITY				IGNIFIC	ANCE		
Definite	Highly probable	Probable	Improbable	Low	L-M	Medium	M-H	High	
		STA	TUS & INTE	NSIT	Y				
Major		Moderate Minor			nor				
+5	+4	+3	+2	+	1		Positiv	'e	
-5	-4	-3	-2	-	1		PositiveNegativeFREQUENCYHighMedLow		
DURATION						FR	EQUE	NCY	
Transient						High	Med	Low	
ISSUE									
Change of w	vater quality								
		NAT	<b>FURE OF IM</b>	<b>IPAC</b>	[				
Change/alter water habita	-	uality the imp	oundment and	l impac	t on liv	veforms fo	ound in	open	
		AF	FECTED AI	REAS					
Impoundme	nt area								
			MITIGATIO	N:					
Important in	formation for	or consideratio	<u>n:</u>						
(i) The	applicant has	s to comply wi	ith Euro-Gap	specific	cations	•			
What was for	ound?								
The impoun	ded areas of	the existing S	Semple dam sl	nowed	signs o	of high or	ganic m	aterial and	
		tic water plant							
	-	-	-						
trees are most probably the catalyst for this and can have an influence on the water quality. The footprint of the proposed new impounded footprint has a profusion of vegetation.									
l									
								A STATE OF	

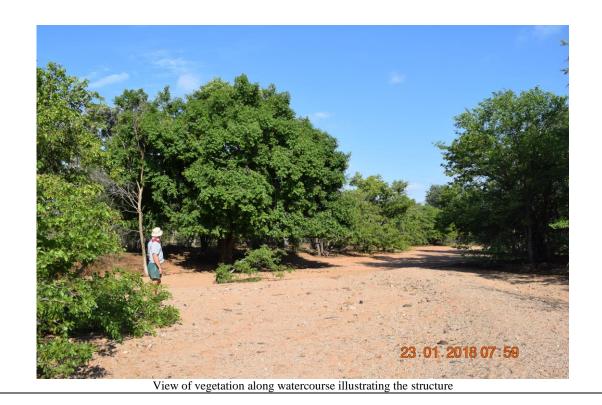


View of remaining vegetation

View of aquatic vegetation



View of vegetation on area of proposed new inundated area



When vegetation is not removed nutrients will build-up which results in organic pollution from organic material left in the basin can occur. The more plant material, and in specific trees left *in-situ* will result quicker build-up of nutrients. Below is an abbreviated explanation.

*"Microcystis* is a genus of freshwater cyanobacteria which includes the harmful algal bloom *Microcystis aeruginosa*. The cyanobacteria can produce neurotoxins and hepatotoxins, such as microcystin and cyanopeptolin.

The term "microcystin" refers to a group of liver toxins that are produced by many species of cyanobacteria. The name microcystin comes from the genus *Microcystis*, one of the most widely known genera that produce this widespread toxin. *Microcystis aeruginosa*, a photosynthesizing freshwater cyanobacterium, is the most common producer of toxic microcystin and is often associated with eutrophic freshwater systems, where they form large, toxic blooms. *Microcystis aeruginosa* is single-celled bacterium that forms colonies ranging from a few individuals to millions of bacteria and can group together to create blue-green layers of scum on the surface of freshwater systems (e.g Lake Hartebeespoort). This scum blocks light from reaching the bottom of the water column and can lead to hypoxic zones due to the overconsumption of oxygen during the decomposition of dead cyanobacterial cells."

Recommendations for mitigation:

The three points below should be mentioned as conditions.

- 1. The removal of the vegetation out of the inundated area will prevent the organic materials influence on the water quality.
- 2. It is recommended that a monitoring programme is made a condition and initiated when construction has been completed and dam filled with water.
- 3. The monitoring should include both dams; the smaller Overvlakte-and extended Semple dams and the well-field.

Clinate: Flooding (and floodines)         PHASE       Operational         CONFIDENCE       High-Definite         EXTENT       RISK         Side Specific       Local       Regional       National       Yes       No         PROBABILITY       SIGNIFICANCE         Definite       Highb & Probable       Low       L-M       Medium       M-H       High         ATTUSE INTENSITY         Major       Moderate       Minor         1       Negative         -2       -1       Negative         OURATION       FREQUENCY         Transient       Short-term       Medium       Low       ISSUE         Development within 32m development from riverbaak or in riparian zone and possible flood zones.         NATURE OF IMPACT         NATURE OF IMPACT         Nature of the above mentioned water related resources.         MITIGATION:         Water was foundite         Medium       100 year         Nature of the 1:100 year flood	BIOPHYSI	BIOPHYSICAL CHARACTERISTICS							
CONFIDENCE       High-Definite         EXTENT       RISK         No         PROBABILITY       SIGNIFICANCE         Definite       Right       No         PROBABILITY       SIGNIFICANCE         Definite       Right       No         Definite       Right       No         Definite       PROBABILITY       SIGNIFICANCE         Definite       PROBABILITY       SIGNIFICANCE         Moderate       Minor         ATATUS & INTENSITY         Moderate       Minor         -3       -4       -3         -5       -4       -3       -2       -1       Negative         DURATION       PEROUENCY         Transient       SIGNIFICANCE         INTURE OF IMPACT         NUTURE OF IMPACT         NUTURO       NUTURO									

BIOPHYSIC	AL CHARACT	ERISTICS						
Pollution: Ter								
PHASE		Construction						
CONFIDEN	CE	High (50-100%	b)-positive					
	EX	TENT				RISK		
Site Specific	Local	Regional	National		Yes		No	
		ABILITY				<b>NIFICA</b>		
Definite	Highly probable	Probable	Improbable	Low	Low- Medium	Medium	Medium- High	High
		S	TATUS & INT	ENSITY				
Major		Moderate		М	linor			
+5	+4	+3	+2		+1		Positive	
-5	-4	-3	-2		-1		Negative	
		DURATIO					REQUENCY	
Transient	Short-term	Medium	Long-term	-	nanent	High	Med	Low
			COMPLIAN	ICE				
Construction	: Low-medium	(Compliance)						
D 11 ( ) 1		•	ISSUE					
Pollution by c	onstruction equ	*						
(i) Dolluti	on of land by a		NATURE OF IN pment spilling d		udeoulio flui	da		
		construction was		lesel/011/11	yuraune nu	lus		
	on by productiv		AFFECTED A	REAS				
Footprint area			ATTECTED A					
1 ootprint area			MITIGATI	DN:				
What was fou	nd?:							
The area has been subjected to human interference with little signs of pollution.								
What is recommended for mitigation:								
(i) Implementing the EMP can mitigate the occurrence of pollution during construction.								
(ii) Independ	lent Environme	ental Auditing du	aring constructio		-			
		ction machinery						
(iv) Drip trays must be issued for each construction machine.								

(iv) Drip trays must be issued for each construction machine.(v) Diesel bowser site has to be constructed as per specifications in EMP.

matural syste	ems: Biodivers	ity and ecologi	cal systems					
PHASE			and operational					
CONFIDEN	ICE	High (50-100						
	EX	TENT				RISK		
Site Specific	Local	Regional	National		Yes		No	
	1	ABILITY				<b>SIGNIFIC</b>	ANCE	
Definite	Highly	Probable	Improbable	Low	Low-	Medium	Medium-	High
	probable				Medium		High	
	1		STATUS & IN	1				
Major	. 4	Moderate	12	N	linor		Desiti	
+5 -5	+4	+3 -3	+2		+1		Positive	
-5	-4		_		-1		Negative	7
Tronsient	Chort town	DURATI(		Da	monort		REQUENCY	
Transient	Short-term	Medium	Long-term		manent	High	Med	Low
Influence on	the biodiversit	ty of the area a	nd influences on		and syster	n functional	itv	
	n: Medium (C : High (Comp							
Influence on	the biodiversit	ty of the grap of	ISSU		and system	n functional		
Influence on	the blodiversi	ly of the area a	NATURE OF			II Tunctional	ity	
Destruction (	of sensitive hal	oitat that suppo	orts biodiversity					
			AFFECTED	AREA	S			
Project footp	orint area							
		BAG	CKGROUND IN	FORM	IATION			
What was fo								
(i) Suri	rounding area							
	• The proie	at ana daas na	ot infringe on des	innatad	Critical Di	a dimansity A	mana an influe	noo it
	• The proje		a mininge on des	Ignateu	Cilical Di	ourversity A		lice It.
	• The prop	osed expansio	n will not inhib	it on ar	y natural	biological p	processes and	influence
	ecosystem	-			5	0 1		
	•							
(ii) Proj	ject area							
	• The foot	print area of t	he project is si	tuated i	n close pr	oximity to	existing foot	print are
			y previous farmin					
		print area has as a phased de	been totally alte	ered to	an aquatic	habitat and	the expansion	on can b
		1	1					

(a) Define the footprint and demarcate area before construction commences.

EGOL O GI			1						
		CTERISTICS	<b>S</b>						
Ŭ	Flora protect								
PHASE		Construction							
CONFIDENC		High-Positive					-		
		FENT	r			RIS	K		
Site Specific	Local	Regional	National		Yes			No	
		ABILITY	n			IGNIFIC	CANCE		
Definite	Highly probable	Probable	Improbable	Low	L-M	Medium	M-H	High	
	STATUS & INTENSITY								
Major Moderate					nor				
+5	+4	+3	+2	+			Positiv		
-5 -4 -3 -2					1		Negati		
DURATION							EQUE	ENCY	
Transient	Short-term	Medium	Medium Long-term Permanent High Med Low						
			ISSUE						
Damage, de	struction or p	oisoning of ra	re-, endanger	ed- or p	protect	ed species	5		
			<b>FURE OF IM</b>						
Indiscrimina	ate constructi	on work outsi	de defined for	otprints	areas				
		AF	FECTED AF	REAS					
Footprint and	rea for system	m, water extr	action points,	turn-a	around	areas, st	ockpile	/ lay-down	
areas, altern	ative access	construction re	bads and const	tructior	n camp	S	-		
			MITIGATIO		•				
What was fo	ound?								
		occur on the	project area.						
				on the r	project	area			
No specific plant communities or importance occur on the project area. The vegetation is well represented in protected areas as well as adjoining farms.									
Mitigating recommendations:									
(i) Permits to remove/destroy protected species (from DAFF) have to be applied before									
		• •	iccied species	(IIOIII	DALL	) nave 10	be app	oneu betote	
	construction commences. (ii) Protected plants near the footprint has to be assessed individually after the surveyor								

- (ii) Protected plants near the footprint, has to be assessed individually after the surveyor has done his lay-out on the wall's footprint, to evaluate the possibility to leave the plants in-situ.
- (iii)Any measures mentioned in the EMP has to be implemented.
- (iv)An appointed EO should be appointed for the construction-and rehabilitation phase.

ECOLOGICAL CHARACTERISTICS								
Vegetation: Ve	egetation comm	unities of conser	vation/ scientific	importa	ince			
PHASE		Construction	1					
CONFIDE	NCE	Low-Mediur	n: negative					
	EXT	<b>FENT</b>				RISI	K	
Site Specific	Local	Regional	National		Yes			No
	PROBA	ABILITY			S	IGNIFIC	ANCE	C
Definite	Highly probable	Probable	Improbable	Low	L-M	Medium	M-H	High
STATUS & INTENSITY								
Major		Moderate		Mi	nor			
+5 +4 +3 +2 +1 Positive								
-5 -4 -3 -2 -1 Negative					ve			
DURATION FREQUENCY					INCY			
Transient	Short-term	Medium	Medium Long-term Permanent High Med Low					
			ISSUE					
A Red Data	species occu	rs in the area						
		NAT	<b>FURE OF IM</b>	PACT	1			
The specie i	s not promin	ent and detail	distribution is	un-kno	own			
		AF	FECTED AF	REAS				
Project area	and direct su	irroundings						
			MITIGATIO	N:				
Background	information	:						
One Red Data herbaceous specie that could possibly occur on the area has been identified.								
	The specie Schoenefeldia transiens was found nearby previously.							
-	•		te specific hab		•	ents of the	e plant	
-			1	-	unenn		piune.	
•	Surveys did not indicate sensitive vegetation communities. Recommendation:							

(i) Erect a demarcation fence on the full-board level of dam to ensure that no movement occurs outside the footprint.

ECOLOGI	ECOLOGICAL CHARACTERISTICS								
Fauna: Spec									
PHASE		Construction	n and Operat	ional					
CONFIDE	NCE	Medium (15	5-49%)						
	EXT	TENT				RISK			
Site Specific	Local	Regional	National		Yes		]	No	
	PROBA	BILITY			SI	GNIFICA	NCE		
Definite	Highly Probable	Probable	Unlikely	Low	L- M	Medium	M- H	High	
	l.	STAT	TUS & INTI	ENSITY	Y	l.			
Major		Moderate		Mir	nor				
+5	+4	+3	+2	+	1	P	ositiv	'e	
-5	-4	-3	-2	-1	l	N	Positive Negative RISK ss No		
		DURATION	N				RISK	-	
Transient	Short- term	Medium	Long- term	Perma	anent	Yes		No	
ISSUE									
Survival of	rare/endang	ered animals	10002						
			<b>URE OF IN</b>	<b>ГРАСТ</b>	1				
Species can vehicle mov		ed by constru	ction activiti	es and o	during	operationa	al phas	se by	
		AF	FECTED A	REAS					
Along foot	orint of syste	em							
		Ν	MITIGATIO	)N:					
What was f		C 11 *							
		as found duri			.1	• ,			
-	lity that pro	tected species	s can occur o	n or nea	ar the j	project area	a is a		
possibility.	oroo is surr	ounded by not	tural vagatat	on with	• • <b>r</b> • • •	formania	a to m		
		bunded by nat	-	on wiu	I alcas	for specie	5 10 11	love	
freely away or around the project area. The project area is located in a portion of the farm used for game farming.									
There are no habitat restrictions for species in the small-, medium-and large size range.									
Recommendations:									
(i) The measures as listed in the EMP should be implemented.									
. ,		monitor each		1			ch acti	ivity	
	commences.								
(iii)An inspection report should be kept with photo references.									

ECOLOGICAL CHARACTERISTICS								
Fauna: Influ	ence of activi	ities/behaviou	on wildlife					
PHASE		Construction	and operation	al				
CONFIDE	NCE	High (50-100						
		TENT				RISK		
Site Specific	Local	Regional	National		Yes		No	
	PROBA	BILITY			SIC	<b>GNIFIC</b>	ANCE	
Definite	Highly probable	Probable	Improbable	Low	Low- Medium	Medium	Medium- High	High
		STA	TUS & INTE	INSIT	Y			
Major		Moderate		Mii				
+5 -5	+4 -4	+3 -3	+2 -2	+			Positive Negative	
-5	-4	-3 DURATION		-		FDI	EQUENC	v
Transient Short-term Medium Long-term Permanen					anent	High	Med	Low
COMPLIANCE								
Construction: High								
Operationa	-							
			ISSUE					
Influencing	the natural po	pulations of s	pecies					
			<b>FURE OF IM</b>	<b>IPAC</b>	- -			
(i) Dest	ruction of hat	oitat						
(ii) Crea	ting an artific	ial food sourc	e for scavenge	ers				
		AI	FFECTED AI	REAS				
Area surrou	nding the pro	ject area.						
			MITIGATIC	DN:				
Background	information:							
The develop	ment is situat	ted south of th	e Limpopo Ri	ver.				
The project	area is not sit	uated in a natu	ral corridor.					
Game does of	occur on the p	ortion of farm	n where the de	velopn	nent is pla	anned.		
100 ha can be considered as "lost" as potential grazing.								
What was found:								
(i) The grazing capacity is approximately 12-16ha/LSU.								
	(ii) The developer acquired a portion of the farm Bergen op Zoom 124 MS which provides							
• •	suitable habitat ad grazing for the game species.							
	ommended for	0 0	- <del>-</del>					

(i) That the developer ensures that correct carrying capacity guidelines for game is used.

ECOLOGICAL CHARACTERISTICS									
Natural and	Semi-natur	al: Communi	ties Species of	conserv	vation/o	diversity	y		
PHASE		Construction	n and Operat	ional					
CONFIDE	NCE	Medium (15	5-49%)						
	EXT	TENT					RISK	Κ	
Site Specific	Local	Regional	Regional National Yes No					No	
	PROBA	BILITY				SIGN	IFIC	AN	ICE
DefiniteHighlyProbableUnlikelyLowL-MMediumM-HighProbableImage: Highly and Highly an						High			
STATUS & INTENSITY									
Major		Moderate		Mi	nor				
+5	+4	+3	+2	+	1			Po	sitive
-5	-4	-3	-2	-	1			Ne	gative
		DURATION	N					R	ISK
Transient	Short-term	Medium	Long-term	Perm	anent	Y	es		No
			ISSU	JE					
Survival of	rare/endang	ered animals/	wildlife						
			ATURE OI						
Species car	n be destroy	ed and/or infl	uenced by h	ıman a	ctivitie	s during	g con	stru	iction and/or
during operational phase by incorrect management.									
			AFFECTEI						
Along footp	orint of syste	m, the remain	ning portion	of the t	farm ar	nd the w	vater l	hab	itat created.
MITIGATION:									

#### What was found?

During surveys the species associated with semi-arid savannah was found and included grazers and browsers with spoor of leopard also found.

Interestingly a rubbing-stone was also found used by larger mammals where they rub against after wallowing in mud to remove external parasites. Based on the size and height of the stone it is obvious that it could include only two specific species, e.g. buffalo and black-rhinoceros. Both not found in the area but still preserved in formal protected parks and game farms.



Rubbing stone

#### Recommendations;

- (i) Impacts can be mitigated by implementing the EMP.
- (ii) Control to test whether EMP is implemented is by audit inspections by EO.
- (iii) The monitoring of the establishing of species in the new water habitat can supply valuable conservation data for species in the area. The presence of Red Data Bird species such as:
  - Pell's Fishing Owl;
  - Various storks;
  - Various herons.

CURRENT	AND POT	ENTIAL LAN	NDUSE CHA	ARACE	ERIST	ICS		
Aspect: Ger	neral landus	e and characte	er					
PHASE		Construction	n and Operat	ional				
CONFIDE	NCE	Medium (15	-49%)					
	EXT	TENT				RIS	SK	
Site Specific	Local	Regional	National		Yes			No
		BILITY				SIGNIFI	<b>ICAN</b>	
Definite	Highly Probable	Probable	Unlikely	Low	L-M	Medium	M- H	High
		S	FATUS & II	NTENS	SITY			
Major Moderate Minor								
+5	+4	+3	+2	+	1		Po	sitive
-5	-4	-3	-2	- 2	1		Ne	gative
		DURATION	1				R	ISK
Transient	Short-	Medium	Long-	Perma	anent	Yes		No
	term		term					
ISSUE								
Developme	nt not relate	d to agricultu						
			ATURE OF					
0		l-use is used f		0				
	1	1	U					n cause negative
socio-econo	mic impact	s in deep-rura				tunities are	rare.	
			AFFECTEI		AS			
Project area	and surrou	nding farming	<u> </u>					
			MITIGA	TION:				
What was for								
	indicated th	hat they have	a mining rig	ht on a	portio	n of the pro	oject	area for future
utilization.		1 1 . 0		a				
		d and informa			0	1 1		1 /
indicated that the right to mine will only be activated in approximately 30 years.								
MC Mining does not have an objection to the proposed project but indicated that some								
agreement should be made. This was done in a <i>Memorandum of Understanding</i> between the								
two parties.	dational							
<u>Recommendations:</u> (i) That the MoU is made a condition in the authorisation document.								
(1) I hat	une MOU 19	s made a cond	nuon in the a	utnoris	sation (	locument.		

# CURRENT AND POTENTIAL LANDUSE CHARACERISTICS

CURRENT AND POTENTIAL LANDUSE CHARACERISTICS								
Aspect: Fut	ure use of d	ams						
PHASE								
CONFIDE	NCE							
	EX	TENT			]	RISK		
Site Specific	Local	Regional	National		Yes			
S	L	R	N	No SIGNIFICANCE				
	PROB	ABILITY			SIGN	IFICAN	ICE	
Definite	Highly probable	Probable	Improbable	Low Medium High				
D	D HP P IP L					1	Н	
		S	<b>FATUS &amp; IN</b>	TENSITY				
Major		Moderate		Minor				
+5	+4	+3	+2	+1		Positive		
-5	-4	-3	-2	-1		Ne	gative	
		DURATIO	N			FREQ	UENCY	
Transient	Short-	Long-term	Permanent	High	Med	Low		
	term		_		-			
Т	S	М	L	Р	Н	М	L	
	ISSUE							
Le 20 mene MC Mining and start mining and the section section is the descent sector								

In 30 years MC Mining can start mining on the portion occupied by the new expansion NATURE OF IMPACT

Water for farming activities will be influenced

AFFECTED AREAS

Noordgrens Boerdery activities

### **MITIGATION:**

Background

Water is a natural resource that will always be in demand.

MC Mining has the right for future mining on a part of the project area. This is explained in Competent Persons Report for MC Mining, attached as Appendix D.

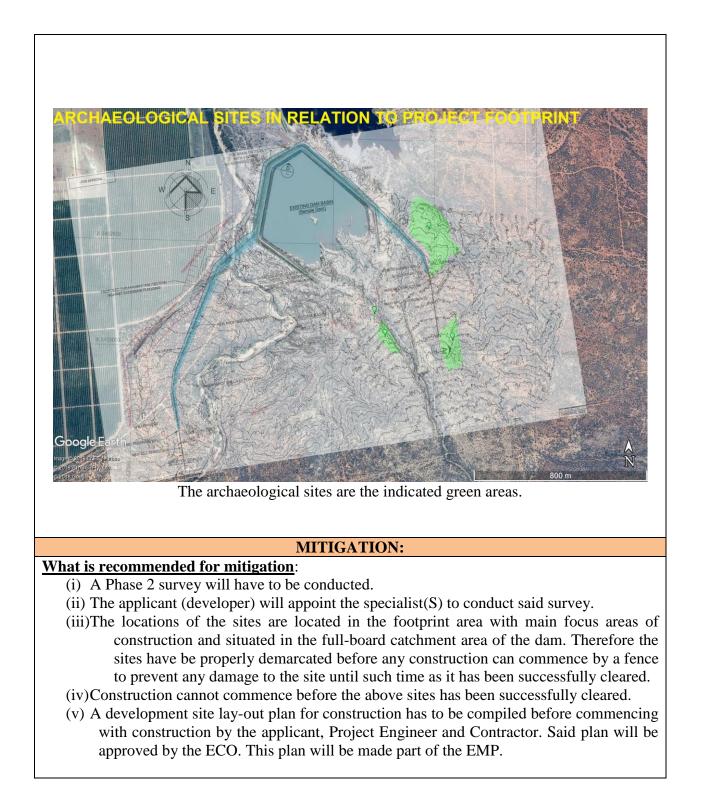
The options for MC Mining to implement their rights is to:

- (i) Buy the project area form Noordgrens Boerdery and then to:
  - a. Rehabilitate the dam and start mining;
  - b. Reconfiguration of the damwal to exclude the mining portion;
  - c. To keep the dam as is and use the water for mining.

The two parties, e.g. Noordgrens Boerdery and MC Mining had a meeting to address the issue of the mining rights future implementation. It was agreed that a *Memorandum of Understanding* is drafted between the two parties. This *MoU* will address the future decommissioning of the dam. Recommendation:

- (i) A *Memorandum of Understanding* is attached to this application. The decision is for MC Mining to make (in the future) when after 30 years whether and when they decide to mine.
- (ii) The MoU is made a condition of the environmental authorisation. The Draft document is attached as Appendix E.

		DERATIONS f archaeologi	cal-or graves					
PHASE		Constructio	on and operati	onal				
CONFIDE	NCE	High (50-1	1	onui				
00111121	=	TENT	,			RISK		
Site Specific	Local	Regional	National		Yes		No	
	<b>PROB</b> A	ABILITY			SI	GNIFICA	NCE	
Definite	Highly probable	Probable	Improbable	Low	Low- Medium	Medium	Medium- High	High
			STATUS & I	NTEN	SITY			
Major		Moderate		Ν	linor			
+5	+4	+3	+2		+1		Positive	
-5	-4	-3	-2		-1		Negative	
		DURAT	ION				EQUENCY	Y
Transient	Short- term	Medium	Long-term	Per	manent	High	Med	Low
Compliance Possible da Project foot	mage or des	struction to a	ISS NATURE O Irchaeological AFFECTE	F IMPA or grav D ARE	ve sites AS	I		
	0		entified on the	1 0			_	_
			haeological re	-			ng previous	sly.
The site has	to be furth	er investigat	ed as recomm	ended	by SAHRA	<b>A</b> .		



# 5 SOCIO-ECONOMIC CHARACERISTICS

SOCIO-EC	ONOMIC C	HARACERI	STICS					
Aspect: Der	nographic lo	ocation and ir	nfluence					
PHASE		Construction	n and Operat	tional				
CONFIDE	NCE	Medium (15	5-49%)					
	EXT	ENT				-	RISK	
Site Specific	Local	Regional	National		Yes			No
	PROBA	BILITY				SIGN	IFICAN	CE
Definite	Highly Probable	Probable	Unlikely	Low	L-M	Mediur	n M- H	High
		1	ГАTUS & I	r		ſ		
Major		Moderate		Mi	nor			
+5	+4	+3	+2	+				sitive
-5	-4	-3	-2	-	1		Neg	gative
		DURATION	1					ISK
Transient	Short- term	Medium	Long- term	Perm	anent	Y	es	No
	term		ISSU	TF				
Provision of	f work in de	ep-rural area	1000					
1101151011 01		*	ATURE O	FIMP	АСТ			
Constant pr	rovision of v							
Contribution								
			AFFECTE	DARE	CAS			
Area: Noord	dgrens Boer							
Municipal:	-	•						
Province: L		C						
National: G		-Zulu Natal						
			MITIGA	TION	:			
What was for	ound?							
The propose	ed expansion	n is to ensure	the use of le	gal allo	ocation	of wate	er for pro	ducing citrus.
There is pot	ential to ext	end the orcha	urds.					-
The type of	farming act	ivity is labou	r intensive w	vith hig	h skill	develop	ment ne	eds.
Farming is a	a repeatable	activity over	time using r	enewal	ble res	ources a	nd will h	ave a longer life-
span than m	0							
Labour is so	ourced from	communities	at:					
<ul> <li>Blou</li> </ul>	ıberg							
• Dzar	nai/Makhad	0						
<ul> <li>Siba</li> </ul>	sa							
and	from							
• Zim	babwe							
Recommend	dations:							
		easures neces	• •	-		ct will c	ontribute	e to socio-
		re of an area a	and region a	nd furtl	ner.			
Expected or		itive.						
Certainty: H	ligh degree							

SOCIO-EC	ONOM	IIC C	HARAC	ERISTIC	CS					
Aspect: Eco	onomic	and e	employm	ent status	S					
PHASE			Constru	ction and	d Opera	tional				
CONFIDE	NCE		Mediun	n (15-49%	%)					
		EXT	ENT					R	ISK	
Site Specific	Loca	al	Regional	Nati	onal	Yes No				No
PROBABILITY						SIGNIE	<b>FICANCE</b>	,		
Definite	High Proba		Probab	ole Un	likely	Low	L-M	Medium	n M-H	High
STATUS & INTENSITY										
Major			Moder	ate		Mi	nor			
+5	+4	-	+3		+2	+	-1		Positi	ve
-5	-4		-3		-2	-	1		Negati	ve
DURATION					RISK			X		
Transient	Short-t	term	Mediu	m Lor	ng-term		anent		Yes	No
					ISSU	JE				
Social-ecor	nomic se	ecurit	y							
					URE O					
Security for	r worke	rs and	d their fa			<u> </u>		ses emplo	oyment	
				AFF	<b>ECTE</b>	D ARE	AS			
Area: Noor										
Municipal:			strict Mu	nicipality	7					
Province: L										
Internationa	al: Zimł	babw	e							
				Ν	IITIGA	TION	:			
What was f										
That citrus		-								
			d horizo	ntal mana	agement	oppor	tunities	for work	ers to exce	el and grow in
the farming	structu	ire.								
Numb	er	N	Iale	Female						
Perman	ent	1	60	20	1					

Permanent	160	20					
Temporary	400	200					
Total	560	220					
Skill levels							
Skilled	19	NA					
Semi-skilled	5	4					
Un-skilled	536	216					
Total	560	220					

Expected outcome: Positive. Certainty: High degree

# **Recommendations:**

(i) No mitigating measures can be made as Noordgrens Landgoed is compliant with national and international requirements.

# 6 INFRASTRUCTURE SERVICES

INFRASTE	RUCTURE (	CHARACER	ISTICS					
Aspect: Ad	equacy of w	ater resources	S					
PHASE		Constructio	n and Operat	tional				
CONFIDE		Medium (15	5-49%)					
	EXT	ENT					RISK	
Site Specific	Local	Regional	National		Yes			No
-	PROBA	BILITY	L			SIGN	IFICAN	CE
Definite	Highly Probable	Probable	Unlikely	Low	L-M	Mediur	n M-H	High
		S	FATUS & I	NTEN	SITY			
Major		Moderate		Mi	nor			
+5	+4	+3	+2	+	-1		Pos	itive
-5	-4	-3	-2	-	1		Neg	ative
		DURATION	1					SK
Transient	Short-	Medium	Long-	Perm	anent	Y	es	No
	term		term					
			ISSU	JE				
Expansion	of storage ca	<u> </u>						
			<b>ATURE O</b>					
		d for storage						
	-	egetation and	•					
More water	will be avai	lable downst				eam wate	er users.	
A	4 - 1 70 h 4		AFFECTE		LAS			
	•	ares will be in	•					
The riparta	ii zone down	stream from	MITIGA					
What do w	a know?		MIIIGA	TION	•			
What do w(i)The		eserve of the	Limpopo Di	vor ha	a not b	aan data	rmined by	WS
• •	-	$3 707 \text{ m}^3 \text{ has}$					•	y D WS.
• •		d for water av			U		•	October
		ater is in sequ						
. ,		-		0				lained below:
•		•		-	-		• •	period water is
		ed into dams.					0	L
•	Phase 2	(Late-summe	r to early-wi	nter): S	Supply	from bo	oreholes	
•		Mid-winter t	-					dams
•		Early-summ		· •				
(v) Mor		•		,		•		mmarised as:
	-	(quantity) fro	-	-				
b. Wat	er volumes (	(quantity) fro	m borehole v	well-fie	eld on I	Limpopo	o River ba	ank;
		r both source	s; especially	the sa	lt conte	ent whic	h indicate	es that the
aqui	ifer has been	depleted;						

- d. Water monitoring in citrus orchards.
- (vi) Water is pumped from two extensive fields up-stream of Noordgrens Boerdery; the furthest at  $\pm 6.8$  km and the nearest at  $\pm 3$ km.
- (vii) For Venetia Mine a well-filed is situated further up-stream.
- (viii)Overvlakte Portion 4&5 farming is situated  $\pm$  3.3 km downstream.
- (ix) Karoi Boerdery is situated 24 km downstream.
- (x) Musina Municipal Water Facilities is situated  $\pm$  50 km downstream.
- (xi) Water is also taken form the Limpopo River and its aquifer by Zimbabwe farming activities.
- (xii) The confluence of the Limpopo-and Sashe Rivers is  $\pm 24$  km upstream.

### What was found?

Confirmation of Extent and Lawfullness of Wateruse (by DWS) is supplied in Table 1 below.

Table 1: WATER SOURCE BREAKDOWN
ruble 1. Whiteh boottee bitehind o with

PROPERTY	SURFACE	BOREHOLE		TOTAL					
				m <sup>3</sup> /ANNUM					
Overvlakte	1 526 320		381 580	1 907 900					
Semple	1 031 710		6 554 397	7 586 107					
Noordgrens	847 553		882 147	1 729 700					
TOTAL m³/ANNUM	3 405 583		7 818 124	11 223 707					
Percentage of water /source	30.34%	6	9.66%						

The main source of water is from the boreholes.

In Table 2 the storage capacity of existing dams and with the expansion is supplied. Table 2: STORAGE VOLUMES (CURRENT &

EXTENSION)	
DAM	VOLUME IN m <sup>3</sup>
Overvlakte	750 000
Semple	1 200 000
	1 950 000
Semple: Extension	3 800 000
Total Storage*	5 750 000

\* After completion of extension

Even with the expansion of Semple dam a total of 5 473 707 m<sup>3</sup> will not be able to be stored. To use this water it has to be pumped either directly onto orchards or into impoundments.

The expansion of Semple dam is approximately 70 hectares which will be inundated by water. The expansion will make it possible to re-establish 30 ha of citrus and to establish 130 ha new citrus orchards.

Noordgrens Boerdery has developed a pro-active water management plan, and is still busy with further development, for sustainable farming.

### **Mitigation Recommendations:**

The mitigation recommendation is to provide an off-set programme for sustainable use of the water resource.

(i) A *Water Monitoring Management Plan* has to be compiled and should include as a minimum the following monitoring aspects:

- a. High flow at main extraction point from Limpopo River.
- b. Water abstraction volumes for each borehole over calendar days per annum.
- c. Annual wateruse model integrated with the annual available water as experienced for the annual weather pattern.
- d. Water quality from each source.
- e. Monitoring of water stress in riparian vegetation
- f. Monitoring of riparian vegetation structure at:
  - location above extraction point;
  - extraction point; and
    - below extraction point.

This program should include species lists, structure and occurrence with listed impacts per monitor site other than water related impacts. Rational:

The Water Monitoring Management Plan is critical to ensure that the primary source for water, e.g. the Limpopo River and its aquifer can supply sufficient water without inhibiting other water user's needs as well as being harmful to the ecological system of the Limpopo River.

The data collected has to be extended with the objective to collect data that can supply a better understanding of the seasonal distribution and subsequent ecological reserve as experienced along the Limpopo River bordering Noordgrens Landgoed.

Refer to Hydrological Information and Techniques to Support the Determination of the Water Quantity Component of the Ecological Reserve for Rivers (Hughes and Münster, 2000).

Expected Outcome: Positive Certainty: Medium-High degree of certainty

	ANDLEV	/EL OF PRI	ESENT ANI	) FUT	URE EN	VIRON	IMENTAL	POLLUTION
Pollution:	Water							
PHASE		Constructi	on and opera	tional				
CONFID	ENCE	High (50-1	.00%)					
	EX	TENT					RISK	
Site Specific	Local	Regional	National		Yes	No		
	PROB	ABILITY				SIGN	IFICANC	E
Definite	Highly probable	Probable	Improbable	Low	Low- Medium	Medium Medium- High		- High
			STATUS	& INT	ENSITY	7		
Major		Moderate		M	linor			
+5	+4	+3	+2		+1		Pos	sitive
-5	-4	-3	-2		-1		Neg	gative
		DURATI	ON				FREQ	UENCY
Transient	Short- term	Medium	Long-term	Per	manent	Hig	h Meo	d Low
			COM	<b>IPLIA</b>	NCE		·	
Operation	nal: Low-r	nedium (Cor	mpliance)					
			]	ISSUE	,			
How and	what pollut	tion can occ	ur					
			NATURI	E OF I	MPACT			
Pollutants	can end up	o in water so	ources					
Definition	<u>ı:</u>							
National V	Water Act,	1998 (Act N	lo 36 of 1998	8)				
• <i>Po</i>	ollution: me	eans the dire	ect or indired	ct alter	ation of t	he phy.	sical, chem	ical or biological
pro	operties of	a water reso	ource so as t	o make	e it-			
(a)	) less fit fa	or any beneg	ficial purpos	se for	which it i	may re	asonably l	be expected to be
USe	ed; or							
(b)	) harmfull o	or potential	harmful-					
			alth or safet			gs;		
	(bb) to an	y aquatic or	non-aquatic	organ	isms;			
	(cc) to the	resource qu	uality; or					
	(dd) to pro-							
• Wa	aste: inclu	des any so	olid materia	il or	material	that i	's suspend	led, dissolved or
	-					-	-	posited on land or
					-			o cause, or to be
rea	asonably li	kely to caus	e, the water i			olluted		
			AFFEC	TED A	AREAS			
The follow	-	were consid						
		adima musica	toroo					
	eas surrou	liding projec	t alta.					
• Ar			ver upstream					

58

	MITIGATION:
	ind information:
(1) 1 h	e water stored has two sources
•	From Limpopo River: the quality varies
•	From well-field: quality also deteriorates late in the winter and early summer.
(ii) Th	he water is monthly tested for pollutants by an accredited laboratory. It is within the prescribed legislation:
	• National Water Act (Act No 36 of 1998), Schedule to General Authorisation No 665 of 6 September 2013.
Duestion	s and Answers which has to be answered:
	Can the water be polluted?
	A: What was found is that the quality of the sources varies seasonally and is directly
	related to the seasonal rains and subsequent flow volume in the Limpopo River.
(ii) Q	: Are there suspended solid material in water (refer to definition above)?
	A: No. The water has suspended material from plants as per definition inserted in
	box below.
	Definition as per National Environmental Waste Act:
	"organic waste" means waste of non-anthropogenic origin that is
	readily biodegradable in the environment and does not contain
	any toxic substances that may accumulate in the environment
	any toxic substances that may accumulate in the environment
(iii)Q:	Does the water biological property pose a pollution risk?
(iii)A:	No pollution can take place as no activities that could be the source or cause of
	pollution is allowed.
	Why not?: The biological or chemical properties of the water pumped are not altered as it is
	The biological or chemical properties of the water pumped are not altered as it is
	pumped from the Limpopo River or well-field. Rational:
$(\mathbf{i}_{\mathbf{v}})\mathbf{O}$	The laboratory test results taken each month confirm the above.
$(\mathbf{I}\mathbf{V})\mathbf{Q}.$	Can the water that percolates into the aquifer have a negative effect on the water.
	A: The water cannot have any negative effect on the water-table quality.
	a found?
What was	
What was	he water quality is tested (by an accredited laboratory) to conform to minimum
What was	water quality is tested (by an accredited laboratory) to conform to minimum standards set by DWS and the proponent that produces an export product that has to
What was (i) Th	he water quality is tested (by an accredited laboratory) to conform to minimum standards set by DWS and the proponent that produces an export product that has to meet Euro-Gap standards.
What was (i) Th What is r	he water quality is tested (by an accredited laboratory) to conform to minimum standards set by DWS and the proponent that produces an export product that has to meet Euro-Gap standards. ecommended for mitigation:
What was (i) Th What is r (i) No	<ul> <li>water quality is tested (by an accredited laboratory) to conform to minimum standards set by DWS and the proponent that produces an export product that has to meet Euro-Gap standards.</li> <li><u>ecommended for mitigation</u>:</li> <li>o other measures are recommended as no form of pollution input could be discerned</li> </ul>
What was (i) Th What is r (i) No fro	he water quality is tested (by an accredited laboratory) to conform to minimum standards set by DWS and the proponent that produces an export product that has to meet Euro-Gap standards. ecommended for mitigation:

RISK AND	HAZARD CI	HARACERIS	TICS					
Aspect: Iden	tity and level	of hazard to	public and pro	operty				
PHASE Construction and Operational								
CONFIDENCE     Medium (15-49%)								
EXTENT						RISK		
Site Specific	Local	Regional	National		Yes			No
	-	BILITY				<b>IGNIFIC</b> A		
Definite	Highly Probable	Probable	Unlikely	Low	L-M	Medium	M-H	High
		STA	TUS & INTI	ENSITY	Y			
Major		Moderate		Miı	nor			
+5	+4	+3	+2	+	1	Positive		
-5	-4	-3	-2	-	1		Negative	e
		DURATION	1	RISK				
Transient	Short-term	Medium	Long-term	Perma	anent	Ye	s	No
			ISSUE					
Safety of pe	ople living/w	orking below	the dam-wall					
		NA	<b>FURE OF IN</b>	<u> ИРАСТ</u>	<b>.</b>			
In worst cas	e scenario wl	nere dam-wall	collapses/bre	eak				
		AI	FFECTED A	REAS				
Area below	dam-wall bet	ween dam and	l Limpopo Ri	ver as w	vell as d	lownstrear	n	
			<b>MITIGATI</b>	DN:				
What was fe	ound?							
	-	ed between da	-	-				
The border s	ecurity system	m consisting o	of fences and j	patrol re	oad will	l also be af	ffected.	
The border security system consisting of fences and patrol road will also be affected. The two identifiable issues for a possible dam-wall failure are:								

- (i) Dam-wall design, which includes not only the dam-wall but also the overflow. This is controlled by:
  - a. Design by an experienced Engineer approved and registered with DWS.

b. Control on the design by a Safety Class application by DWS. Note:

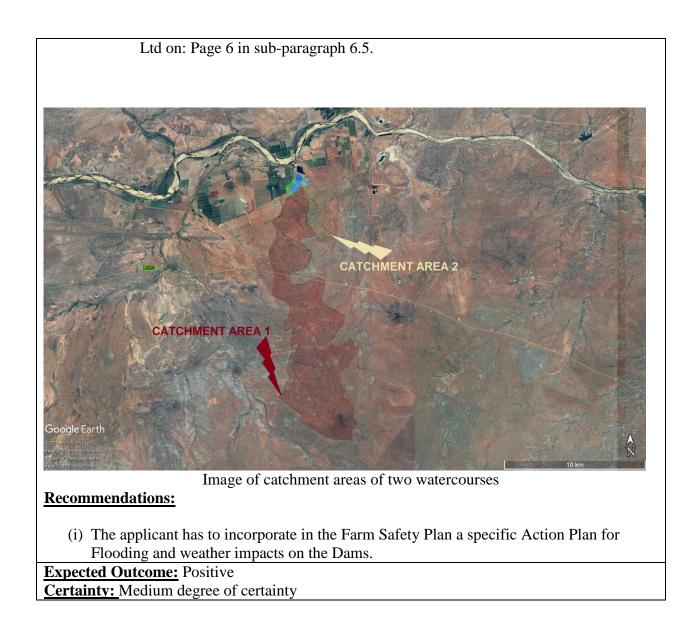
The above issue is addressed in the *Preliminary Design Report* by PG Consulting Engineers (Pty) Ltd on:

- (i) Page 15 in sub-paragraph 5.2;
- (ii) Page 4 in sub-paragraph 6.5.

(ii) Natural events

a. This is mostly extreme weather conditions where more-than normally expected and calculated water can impact on the dam-wall. The Limpopo River and two un-named epherical watercourses can have an influence on the integrity of the dam-wall. The first is the Limpopo River in a 1:100 year flood. This has been calculated and the wall is situated outside this flood zone. The second threat is epherical watercourses with the first a catchment area of approximate 54.4 km<sup>2</sup> and the second approximately 4.8 km<sup>2</sup>.

Note: The design includes not only a main spill-way but also an emergency spillway. Refer to *Preliminary Design Report* by PG Consulting Engineers (Pty)



# 9 HEALTH AND SAFETY

None

### 10 CUMULATIVE AND SYNENERGISTIC EFFECTS

CUMULAT	IVE AND S	UNENERGIST	TIC CARACT	ERISTI	[CS			
		and social envir				ative stress	placed	on them
PHASE	PHASE Operational							
CONFIDEN	NCE	Medium-High (50-75%)						
	EXTENT RISK							
Site Specific	Local	Regional	National		Yes		N	lo
PROBABILITY					SI	<b>GNIFICA</b>	NCE	
Definite	Highly Probable	Probable	Unlikely	Low	L-M	Medium	M- H	High
		STAT	TUS & INTE	NSITY				
Major		Moderate		Mir	nor			
+5	+4	+3	+2	+	1	F	ositive	
-5	-4	-3	-2	-1		Ν	egative	
		DURATION					RISK	
Transient	Short-term	Medium	Long-term	Perma	anent	Yes		No
			ASPECTS					
1. Loss	of habitat							

2. Loss of biodiversity

- 3. Impact on mining rights of MCM
- 4. Inundation of area
- 5. Pumping of water in high-flow periods

#### NATURE OF IMPACT

Species can be destroyed by continuous water abstraction from the primary source.

#### **AFFECTED AREAS**

Riparian zone at extraction point and river aquifer downstream

**MITIGATION:** 

### What was found?

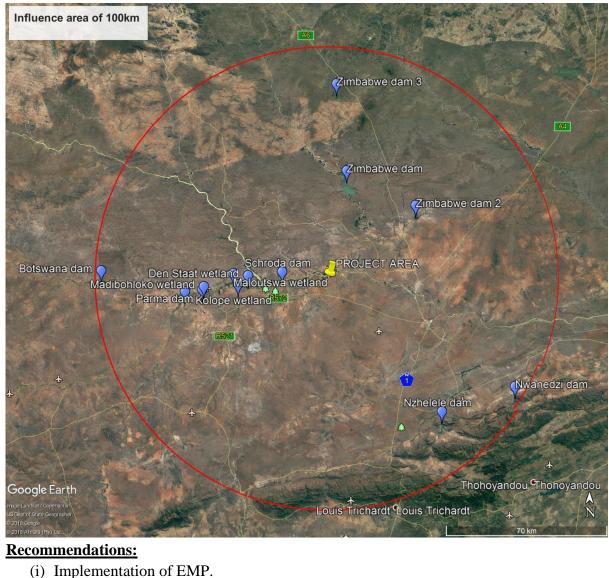
To pump water during high-flow periods will result in adequate water for irrigation in winter and early summer (before the rainfall season starts).

The rational is that this will result in more water in the Limpopo River in this period that flows (sub-surface in the sand stratum) downstream This flow will contribute to supporting the aquifer as well as the riparian vegetation. The biodiversity "driver" is the riparian zone but the supporting system for the riparian zone is the sub-surface water especially in the dry-period. Currently the applicant also pumps from boreholes along the Limpopo River bank, this being done in late-winter when the sub-surface flow in the Limpopo River is low; by not utilising this water from the aquifer the water table will be able to support the riparian vegetation, which in turn will contribute to riverbank stability.

The downstream water needs of water users, and in specific, Musina municipality will also benefit.

The findings in the specialist report *Water Resource Study* it was found that "...although the area is designated a Critical Biodiversity Area (CBA), it is not related to the water resource associated with the proposed site for the new impoundment." The implication is that the new impoundment will not influence the CBA Area. This confirms the surveys conducted on the project location and its surroundings.

It was found that the current dams contribute to supplying a <u>constant</u> water habitat for birds species associated with open water bodies. This is significant in that when the Limpopo River "dries-up" (meaning no surface flow) in the mid-winter to early summer it is the "artificial open-water" of the dams that provide habitat for species. This is a simulation of the *Island Biographical Concept* where habitat "islands" is created for species whose survival is dependent on water. Thus the proposed larger open-water that will be created will contribute to biodiversity stability of certain species. The image below supplies an overview of similar supporting open-water habitats for birds associated with water habitats.



- (ii) Water quantity monitoring instituted (if not already) from all sources of water for the applicant.
- (iii)Water quality monitoring instituted (if not already) at all sources as well as in the orchards.

Expected Outcome: Positive

Certainty: Medium-high degree of certainty

#### 10.3 Potential significant impacts

Impacts with ratings of either *Medium-high* or *High* are impacts, which are regarded as potentially significant, rated without any mitigation measures. In this impact assessment out of a total of 26 impacts 1 were regarded as high and 11 as Medium-high potentially significant impacts, of the 11 impacts regarded as high-and medium potential significant impacts 6 are considered as positive. They are discussed below:

#### 11. DESCRIPTION OF ASSUMPTIONS

In this report it is assumed that:

- i) The developer will act responsible with regards to the environment at all times.
- ii) That the recommendations made in this report and other specialist reports are implemented and followed.
- iii) That the development will abide by the ethical standards of development and will stay within the parameters and design specifications of the development and follow a best practise approach.

#### 12. OPINION ON FACTS

- 12.1 The proposed expansion of Semple dam is a project that has its origin in the planning of Noordgrens Landgoed for sustainable farming by the wise use of water resources.
- 12.2 The location of the new dam footprint and the resultant inundated area was surveyed for biodiversity and ecological sensitivity. No critical issues were identified.
- 12.3 Archaeological site(s) was found and Phase 2 studie(s) will have to be conducted.
- 12.4 The proposed project will benefit the Limpopo River's ecological reserve as less water will be extracted during winter and early summer when the sub-surface flow of the river is at its lowest.
- 12.5 The applicant does monitor the water quality and is willing to extend and broaden the water quality and quantity monitoring as recommended.
- 12.6 The operational live expectancy of the project is for 30 years. This is determined by the High Order Mining permit of which MC Mining is the holder. The current landuse for agriculture activities can proceed and contribute to the local-and regional socio-economic communities.

12.7 Prior to this impact study MC Mining (previously known as Coal for Africa) conducted an environmental impact study which <u>included the Restant of</u> <u>Overvlakte 125 MS</u> (this project area location) and for which an environmental authorisation was issued. Mining is not based on renewable resources whereas farming is based on sustainable use of natural resources. In this EIR no issues were of such a nature that it could not be mitigated, an indication of the long-term sustainability of the project for socio-economic sphere and receiving environment in which this project will function.

#### 13. ENVIRONMENTAL STATEMENT

- 13.1 Summary of key findings
- 13.1.1 No specific evidence was found of any biota at individual or community level that will be threatened to such an extent that it will have a negative impact on the survival of species and/or communities.
- 13.1.2 Archaeological sites were found and Phase 2 investigations will have to be conducted. This has to be done before commencement of construction or incorporated in such a way in the planning that it can run concurrently with pre-construction activities. SAHRA approval has been received.
- 13.1.3 The dam will be registered with DWA and a safety certificate issued after construction.
- 13.2 Positive and negative implications
- 13.2.1 Positive
  - The expansion of Semple dam will not have significant negative effect on the environment or for specific species or communities.
  - ii) The dam will create new habitat for species associated with open water bodies.
    - iii) The water in the dam will be used in the winter months and the sandpit boreholes in the Limpopo Riverbed as well as the borehole field on the Limpopo Riverbank which is currently used will be left to "rest" as reserve. This will lessen the impact on the aquifer dependant ecosystems and ecological reserve of the Limpopo River.
    - iv) The water will also infiltrate and percolate through to the groundwater aquifers.

- v) The rainwater will contribute to the water that can be stored and used, currently it flows away.
- vi) The dam will also serve to prevent stormwater damage.
- 13.2.2 Negative
  - Vegetation will be removed which includes protected species associated with terrestrial landscapes and watercourses.
- 13.3 Comparative assessment of advantages and disadvantages

The **advantages** can be summarized as follows:

- The development will address a critical issue of sustainable water use;
- It will contribute to preserving the ecological reserve of the Limpopo River and in specific the remaining riparian vegetation found along the river at the extraction point and downstream;
- Musina Municipality extracts it water from well-fields along the Limpopo River from water in the riverbed. This water will be less affected by the upstream extraction in wintertime, resulting in more water for extraction.
- It will positively contribute to the socio-economic profile of Musina town and community in general.
- An existing artificial water habitat will be enlarged. It will contribute to habitat for specific migrating birds associated with water habitats.

The **disadvantages** can be summarized as follows:

- Natural vegetation and habitat for terrestrial species will be destroyed and/or altered.
- 13.4 Final statement

No evidence was found or presented by any party that indicates that the dam should not be constructed. Issues could be sufficiently mitigated. The strategic gain collectively is for the good of firstly sustainable water use, secondly for socioeconomic reasons and thirdly for extending conservation and cultural resource areas.

## 14. AUTHORISATION OF ACTIVITY AND CONDITIONS

The purpose of this report is to provide information in a compiled format regards the potential impacts of the proposed development so that the relevant authority can make

an informed decision regarding the approval/not approved of the Environmental Impact Assessment Report. Recommendations are supplied to be included.

- 14.1 Recommendations
- 14.1.1 That the mitigation measures mentioned under paragraph 10.2 for each discussed issue sheet has to be implemented.
- 14.1.2 That recommendations the listed in specialist reports under paragraph 8 is implemented.
- 14.1.3 The appointment of an environmental control officer (ECO) before the project commences.
- 14.1.4 That the ECO appointed has sufficient experience.
- 14.1.5 That the appointment is for the full duration of the project, starting with the preconstruction phase and ending with the rehabilitation phase.
- 14.1.6 That the EMP is updated with new information as the project progresses.
- 14.1.7 That the Standing Operation Plan for Archaeology is implemented on the project.
- 14.1.8 That the Phase 2 archaeological surveys are started before construction commences. The site has to be fenced before any activity commences.
- 14.1.9 The developer with the contractor should mark the roads that will be used for the construction phase. The delineation will then be surveyed by the ECO and approved before any clearing commences on the roads.
- 14.1.10That audit reports are submitted to LEDET as stipulated by LEDET.

J. Claassens

Director: Tua Conserva

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