



**mineral resources**

Department:  
Mineral Resources  
REPUBLIC OF SOUTH AFRICA

## **SCOPING REPORT**

**FOR LISTED ACTIVITIES ASSOCIATED WITH MINING RIGHT (Section 102 Application).**

# **Grootwitpan Salt**

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

<b>NAME OF APPLICANT:</b>	<b>Industrial Salt (Pty) Ltd</b>
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<b>FILE REFERENCE NUMBER SAMRAD:</b>	<b>NCS30/5/1/2/3/2/1(219)MR</b>

**August 2020**  
**Report #: 2758/MR-102/FS**



## **IMPORTANT NOTICE**

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

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

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

### **It is therefore an instruction that:**

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

### **It is furthermore an instruction that:**

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

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**List of Appendices:**

Appendix 1: CV and Qualification of the of EAP

Appendix 2: Declaration of Independence of EAP

Appendix 3: Copy of correspondence Sent (Including newspaper advert and poster placement)

Appendix 4: Copy of correspondence received

**List of Abbreviations:**

BSP	Biodiversity Spatial Plan
CBA	Critical Biodiversity Area
DMR	Department Mineral Resources
EAP	Environmental Assessment Practitioner
EMP	Environmental Management Programme
GIS	Geographic Information System
I&AP	Interested and Affected Party
MWP	Mining Work Programme
NBKB	Northern Cape Heritage Authority
NEMBA	National Environmental Management: Biodiversity Act
NFEPA	National Freshwater Ecosystem Priority Areas
ngl	natural ground level
NID	Notification of Intent to Develop
POD	Public Open Day
SAHRA	South African Heritage Authority
SDF	Spatial Development Framework
SLP	Social and Labour Plan
SPC	Spatial Planning Category

# 1 OBJECTIVES OF THE SCOPING PROCESS

The objective of the scoping process is to, through a consultative process—

- a) identify the relevant policies and legislation relevant to the activity;
- b) motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
- c) identify and confirm the preferred activity and technology alternative through an impact and risk assessment and ranking process;
- d) identify and confirm the preferred site, through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment;
- e) identify the key issues to be addressed in the assessment phase; (f) agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site; and
- f) Identify suitable measures to avoid, manage, or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

## 2 Contact Person and correspondence address

### 2.1 Details and qualifications of the EAP who prepared the report

Refer Appendix 1 for copy of CV and relevant experience.

Name of the Practitioner: Craig Donald

Site Plan Consulting

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Fax No: 021 854 4321

E-mail address: [craig@siteplan.co.za](mailto:craig@siteplan.co.za)

## 3 Description of the property

At present, salt mining takes place in terms of two adjacent Mining Rights held by related yet different judicial entities. The aim of this application is to consolidate those Mining Rights and expand the Mining Right area in the NW.

The application is being made by Industrial Salts (Pty) Ltd. The amendment of an existing application consists of the elements as described in Figure 2 below:

- Abandonment of the Mining Right held by Gordonias Salts (Pty) Ltd and incorporation of that Right into the northern Industrial Salt (Pty) Ltd Mining Right Area

- Expansion of the Mining Right area to the NW to incorporate additional pan area on Portion 18 and Portion 20 of Groot Witpan 327, (parts of which are held under Prospecting Right by another related entity (viz Transalt (Pty) Ltd))

There are 4 land parcels involved:

<b>Farm</b>	<b>Deed Number</b>	<b>Owner</b>	<b>Area (in MR)</b>	<b>21 Digit Code</b>
Portion 13 of Groot Witpan No 327	T1093/1968	Industrial Salt (Pty) Ltd	31.0297ha	C02800000000032700013
Portion 10 of Grootwitpan No 327	T370/1966	Gordonia Salt (Pty) Ltd	180.8103ha	C02800000000032700010
Portion 20 of Groot Witpan No 327	T1791/2008	Industrial Salt (Pty) Ltd	219.0994ha	C02800000000032700020
Portion 18 of Groot Witpan No 327	T683/1984	Industrial Salt (Pty) Ltd	41.1964ha	C02800000000032700018
<b>Total Combined Application Area</b>			<b>472.1358ha</b>	

Magisterial district:	<b>Gordonia</b>
Distance / direction from nearest town	<b>The closest town of any size is Uington located 100km SE as the crow flies. Refer Figure 1 for location of other small settlements around the site</b>



## 4 Locality plan

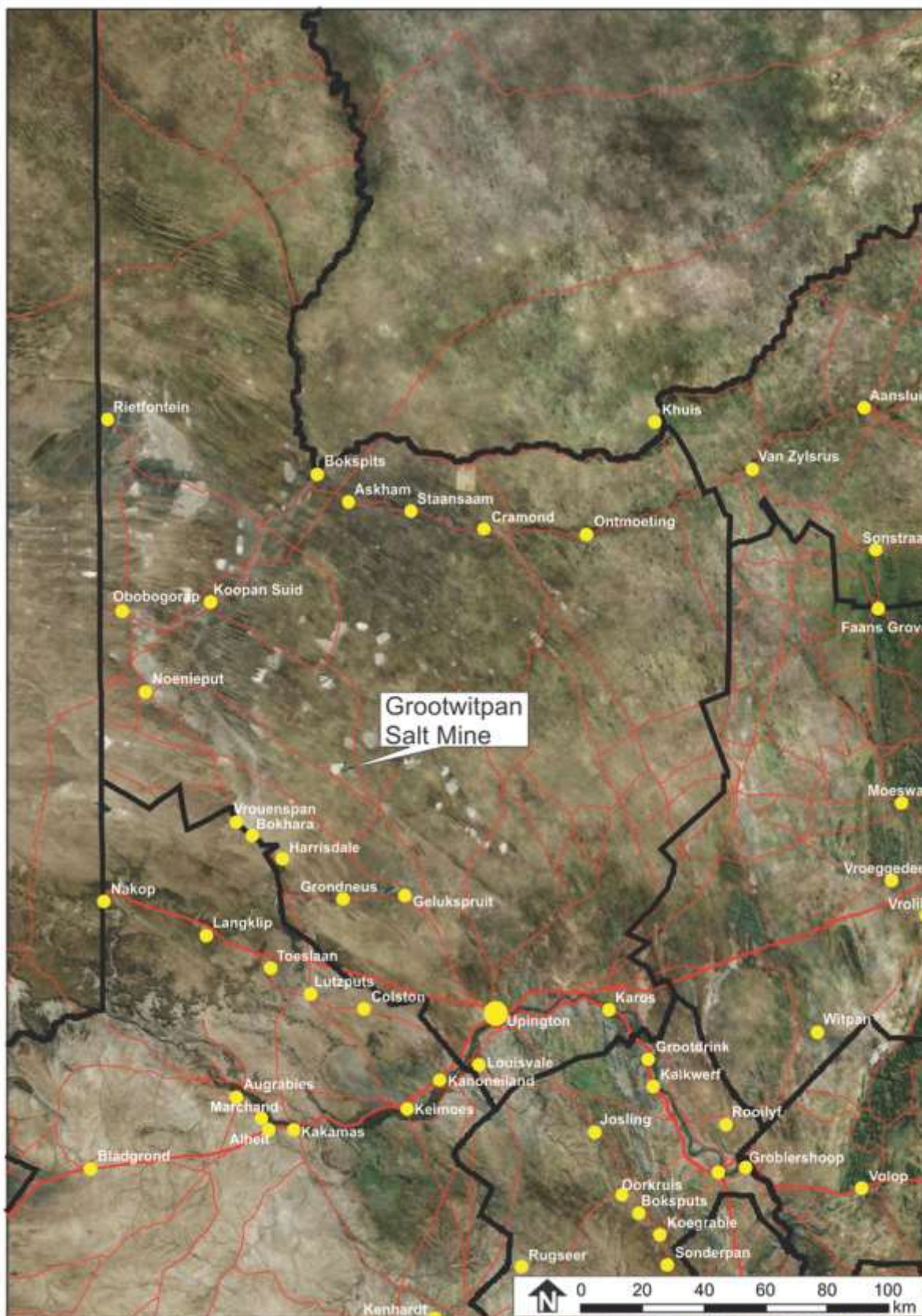


Figure 1: Locality Plan

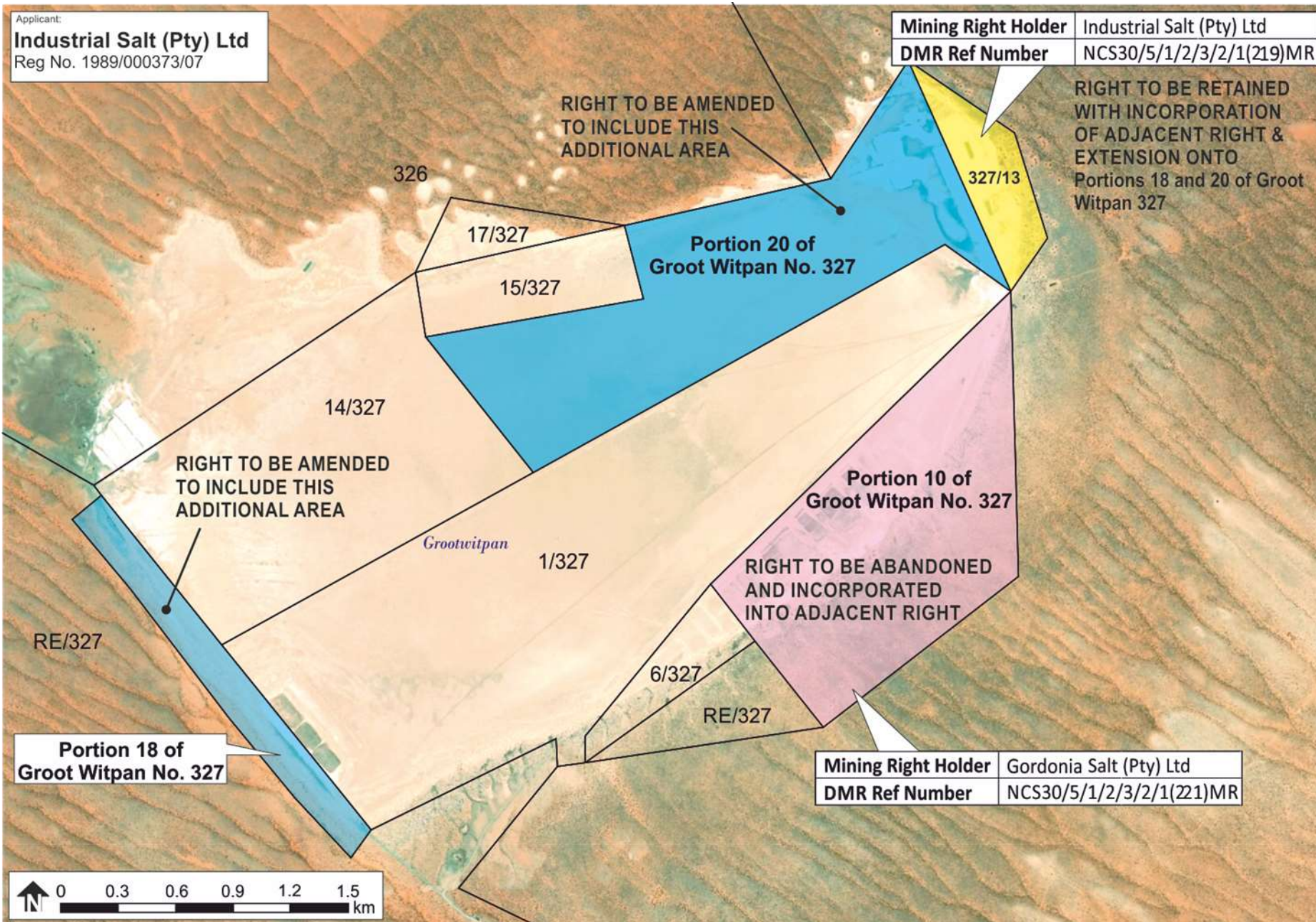


Figure 2: Application components

Applicant:  
**Industrial Salt (Pty) Ltd**  
 Reg No. 1989/000373/07

Sketch Plan as contemplated in  
 Regulation 2(2) of the Mineral and  
 Petroleum Resources Development  
 Act (Act 28 of 2002, as amended)

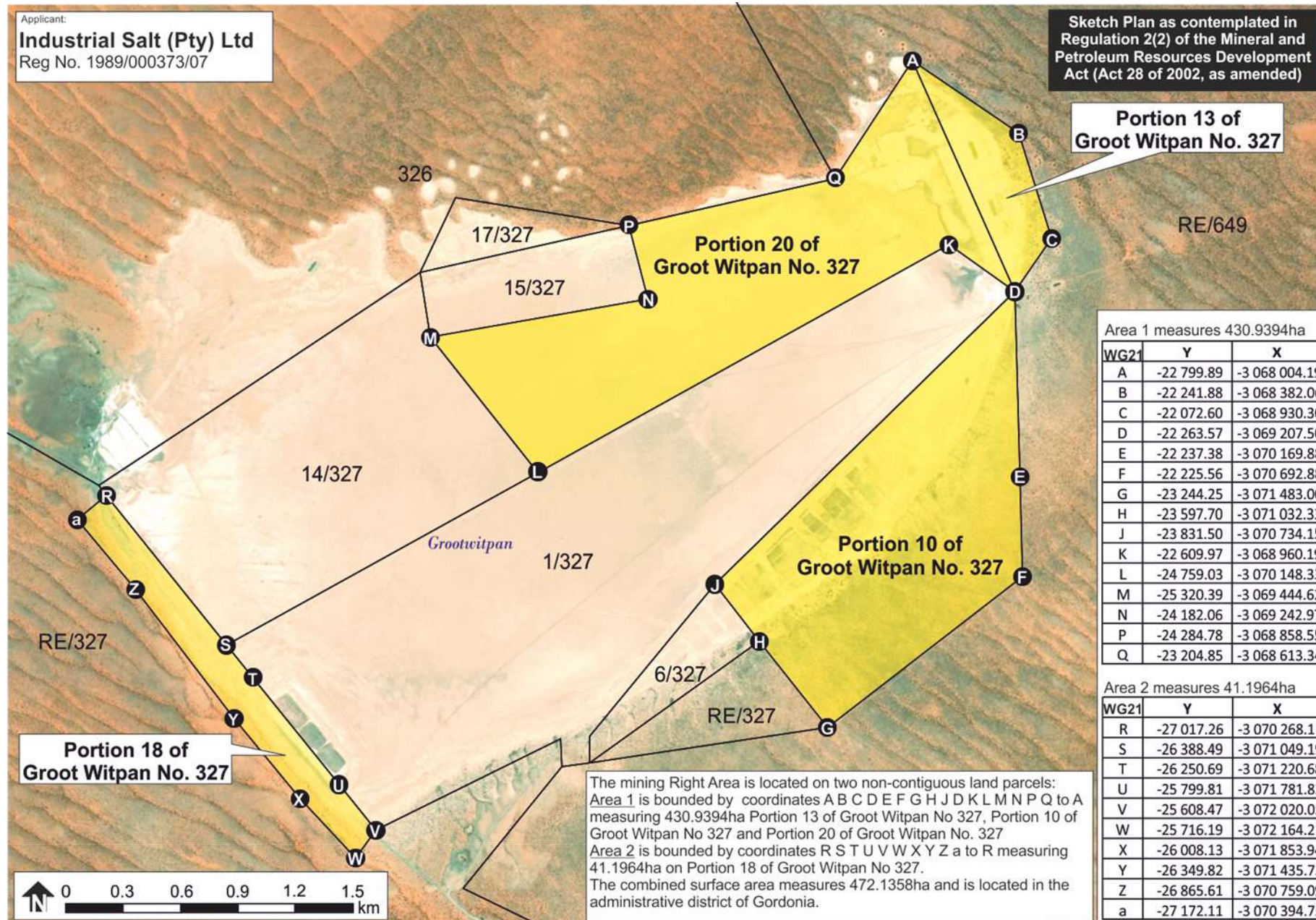


Figure 3: Regulation 2 (2) drawing

## **5 Description of the scope of the proposed overall activity.**

### **5.1 Geology**

Salt mining has taken place on this site for at least the last 30 years. Salt pans result from a combination of circumstances: The availability of susceptible surfaces, disturbance of communication surfaces (by animals and weathering), lack of integrated fluvial systems and power of deflational processes.

It is very difficult to predict the lifespan of a mine such as this given that brine is replenished after every rain or river flow (or other unknown events related to permeability and saturation variations, etc).

The pan has good quality salt (95-99% NaCl). If there are impurities in the salt then the salt is washed and left to dry before bagging.

At this site, the average production rate of salt over the last 5 years is  $\pm 65\ 000$  tons per annum but is likely to increase with the planned later addition of supplemental brine from the Gemsbok Horn pan (dependent on future application success).

### **5.2 Reserves & Lifespan**

As stated above, the lifespan of such a salt deposit is impossible to determine. The salt is replenished through rain episodes. There is however little doubt that the mine will continue producing salt for the next 30 years based on historical experience by the holders.

The holders are currently exploring options to increase production through pumping of brine from other nearby pans to this operation, but such future plans will be subject to all necessary legislative processes.

### **5.3 Mining Method and Site Layout Plan**

Refer Figures 4 & 5 and photos below but note that at present most activities are centred around the northern portion of the operation as contained in Figure 4. Brine is collected through pumping (from pumps mostly located on Portion 20) into holding ponds (as indicated in Figures 4 and 5). The inclusion of Portion 18 into this application is specifically for the possible location of additional pump/s. No evaporation ponds or other infrastructure will be developed on Portion 18.

The brine from the holding / concentration pond is pumped into evaporation ponds. The water evaporates and the salt crystals start to form on the surface. As soon as the layer of salt crystals is thick enough, the salt crystals are harvested scraper and front-end loader.

The water for the brine is constantly replenished from run-off water. There is no discernible dilution of the brine and it is estimated that the salt could be harvested for an indefinite time.

The harvested salt requires sorting. All clumps of salt are removed or crushed and recycled. The finer salt crystals are washed in a rotating washer and crushed between rollers to remove some of the water. The sludge is pumped through a cyclone to remove excess moisture. The washed salt is left to dry and either bagged and loaded or loaded en masse onto carrier trucks and transported to the plant at Klawer or direct to market. Note that all excess brine flows back into a holding pond.

There is a very low percentage of waste salt which is stockpiled on site but used whenever possible as low grade salt sales or recycled through plant to improve purity.

The following equipment use diesel on site (excluding the washing, crushing and cyclone plant described and costed later):

- The 2 x 45kVA generator
- ±15 pump installations on the pan
- 2 x Front End Loader
- 1 x scraper / harvester
- 1 x JCB (excavator)
- 2 x Bell dumpers
- 1 x general purpose tractor

Note that the extent of logistical facilities and existing disturbances are defined in Figures 4 and 5 further below, as well as in Para 6.



Photo 1: Typical electrically driven pump installation on pan.



Photo 2: Main diesel tank left (23kl) and Generator house and 2kl diesel tank (photo right)



Photo 3: Looking south and west from Generator house showing overall view of operations



Photo 4: Looking north and west from Generator house showing overall view of operations



**Photo 5: The southern cleared logistical facility area (also known as the Gordonia Salt section)**



**Photo 6: Photo shows a concentration pond in the background and an evaporation pond almost ready for harvesting in the foreground typically found at solar salt mines on pans in the area.**





Photo 7: Overview of the washing / processing plant at the site.



Photo 8: The last stage in the processing is the final sorting through a cyclone with material fed to roving conveyor. The whole machine is on wheels which allows it to move back to generate an elongated clean salt stockpile with loading form the other end. The waste water from this process is fed to a holding dam /small evaporation pond as per photo 9 below.



Photo 9: The water removed by the cyclone is fed to this pond which evaporates to yield very fine salt in small quantities



Photo 10: The status of the access road. Maintenance and sand control measures are required



Photo 11: Workshop showing concrete working apron and drain leading to oil trap.



**Photo 12: Typical Evaporation pond. Note the "dam" wall at less than 1.5m in height and the shallow nature of these evaporation ponds**

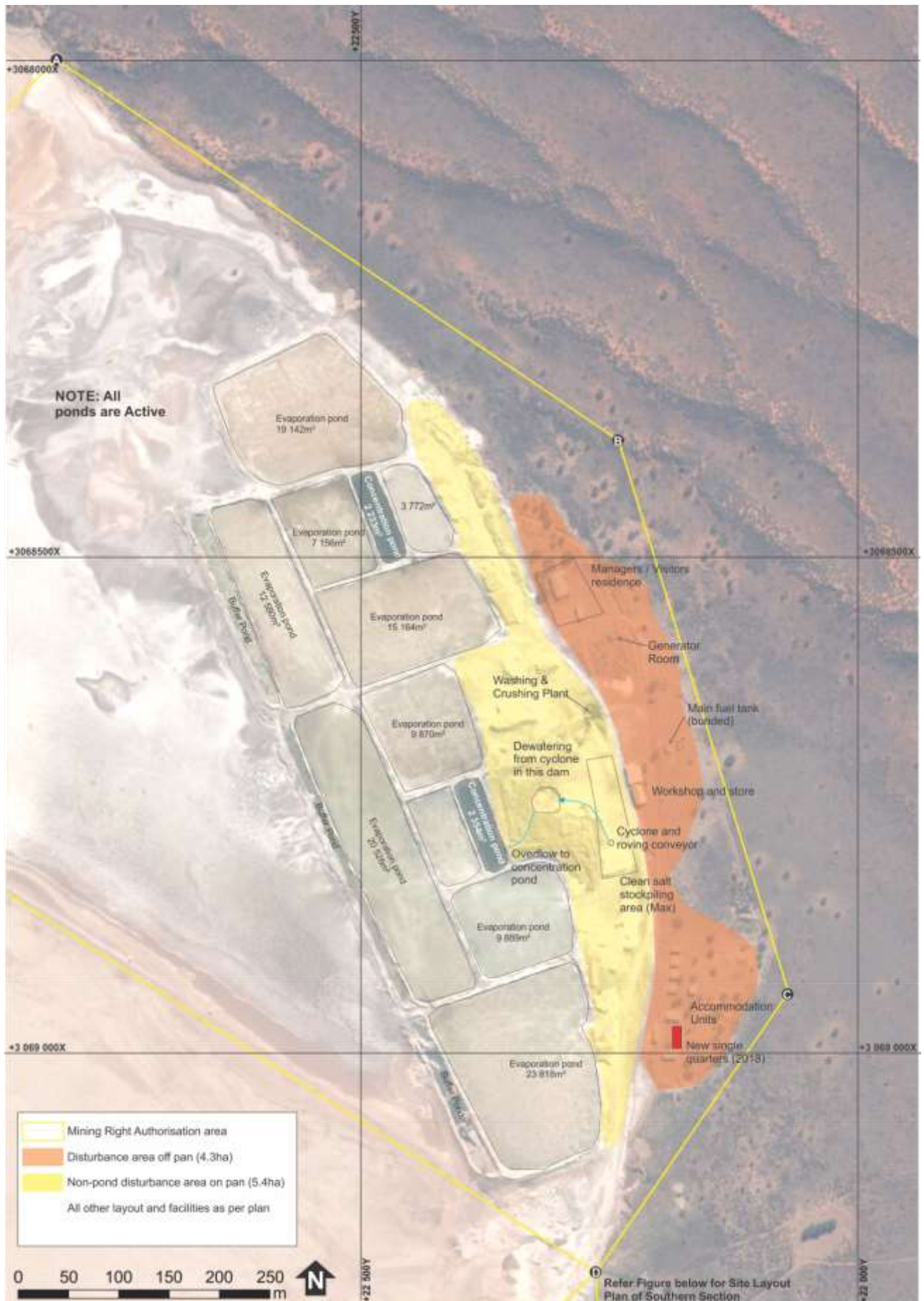


Figure 4: Existing Site Layout Plan for the Northern Section (previously called the Industrial Salt Section)

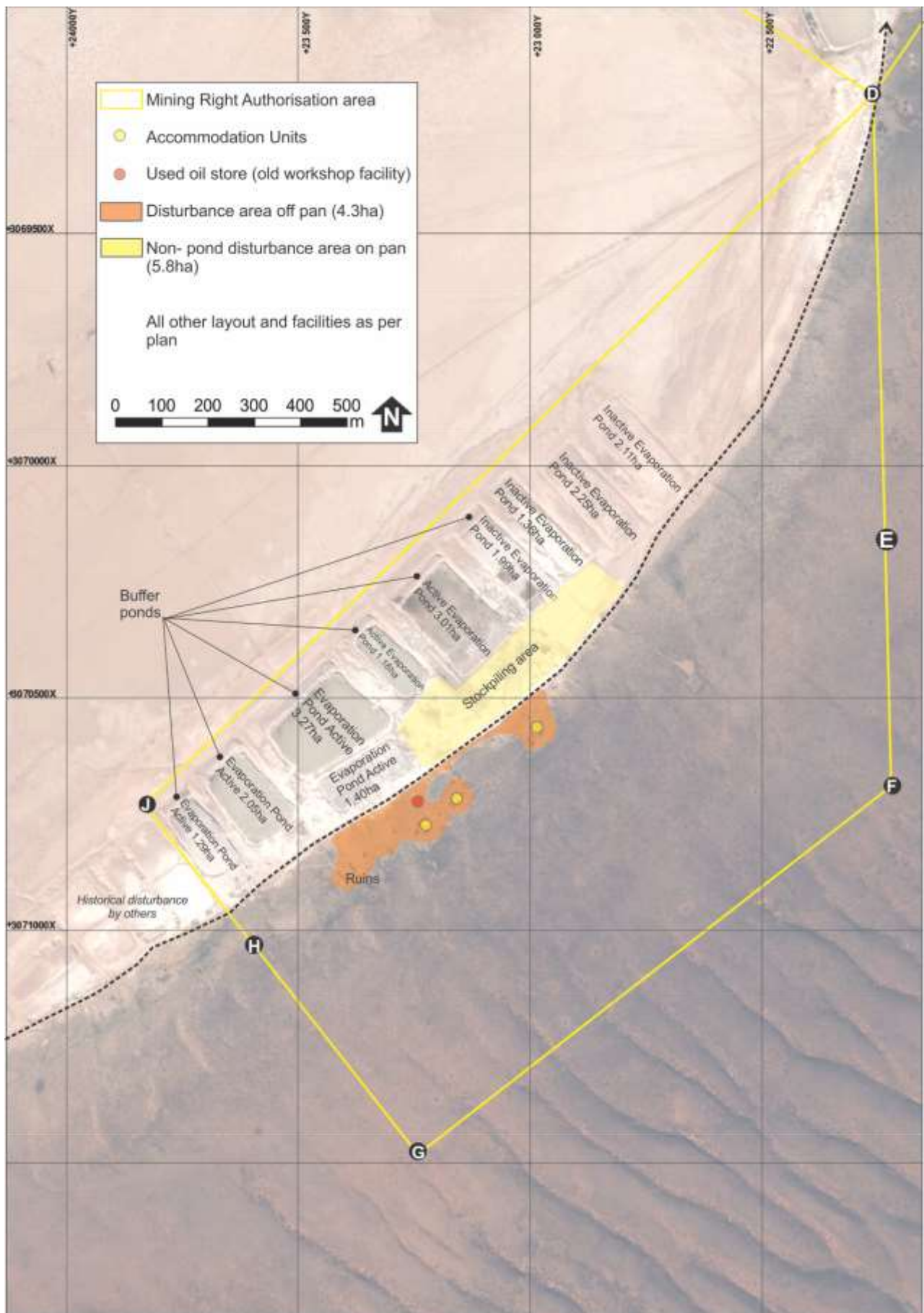


Figure 5: Existing Site Layout Plan for the Southern Section (previously called the Gordonia Salt Section)

## 6 Listed and specified activities

In order to fully determine the listed activities at any site, it is required that the following be determined:

### 1) Critical Biodiversity area

The 2016 mapping published for the Northern Cape on SANBI's BGIS system show that the undisturbed pan areas are categorised as Ecological Support Areas, whilst the area surrounding the pan is located in "Other Natural Area". See Figure 8.

### 2) Vegetation status

The ponds and on pan activities are located on an area defined as having vegetation type Southern Kalahari Salt Pans whilst the off pan activities are located on Gordonia Duneveld. None of these are listed in NEMBA as Critically Endangered, Endangered nor Vulnerable.

### 3) Defined Sensitive Area

The NFEPA mapping could not be downloaded or viewed online. As a result, we have provisionally assumed for this purpose that the wetland is a defined Sensitive Area. This fact will be defined before the draft EIA/EMP is released.

### 4) Zoning

It appears from an extrapolation of the zoning map on the Municipality's website that the site must be zoned as Agricultural. Note however that we could not find a specific zoning for this property.

### 5) SDF:

The SDF states that it uses biodiversity as the guiding principle in the Spatial Planning Category definition. No map could be found that specifically covers the Mining Right area in the SDF but based on a perusal of the documentation, the site would either be classified as:

- Agriculture (C.a.2)
- Other Natural Areas (B.b.3)

The listed activities which are/were triggered as follows:

ACTIVITY	AERIAL EXTENT OF ACTIVITY	LISTED ACTIVITY	LISTING NOTICE (April 2017)	WASTE MANAGEMENT AUTHORISATION
Application for Amendment: Mining Right	472.1358ha	X	Listing 984: Activity 17	
<b>1. ESTABLISHMENT ACTIVITIES (Completed and approved in terms of 2 x existing approved EMPs)</b>	It is important to note that this mine is already in place and no establishment phase is required.			
1.1. Clearing of logistical facility area outside of pan edge (Currently 2 areas i.e. at northern and southern ponds)	Total area = 8.6ha	X	Listing 983: Activity 27 <sup>1</sup>	
1.2. Establishment of logistical facilities including residences, office, workshop, generator facility, etc				

<sup>1</sup> The 20ha requirement is triggered when combined with line items 1.3 and 2.2

ACTIVITY	AERIAL EXTENT OF ACTIVITY	LISTED ACTIVITY	LISTING NOTICE (April 2017)	WASTE MANAGEMENT AUTHORISATION
1.3. Establishment of plant and stockpiling area on pan. (Currently 2 areas i.e. at northern and southern ponds)	Total Area = 11.8ha	X	Listing 983: Activity 27 <b>And</b> Listing 983: Activity 12 <b>OR</b> Listing 985: Activity 14 & 23 <b>And</b> Listing 983: Activity 19	
1.4. Establishment of bunded fuel tanks. There are 3 tanks (main tank behind workshop and smaller tanks at generator and crusher)	±30kl (see note in table below)	X	Listing 985: Activity 10	
1.5. Excavation of material from outside pan to construct pond walls - Done	Within 8.6ha cleared area described in Line item 1.1			
1.6. Development of dam walls for ponds on pan - Done	>10m <sup>3</sup> & >100m <sup>2</sup>	X	Listing 983: Activity 12 <b>OR</b> Listing 985: Activity 14 & 23 <b>And</b> Listing 983: Activity 19	
<b>2. OPERATIONAL PHASE ACTIVITIES (Currently occurring in terms of 2 x approved EMP)</b>				
2.1. Borehole pumping water virtually continuously from middle of pan into concentration ponds (via on surface pipes)	3m <sup>2</sup> / pump area			Will require WULA
2.2. Brine is collected concentration ponds.	±5000m <sup>2</sup> at present	X	Listing 983: Activity 19	
2.3. From these concentration ponds the brine is pumped into evaporation ponds. Evaporation ponds contain brine on the pan surface. Assume water to max 0.4m deep. This is unlikely to all occur at the same time but the capacity is available	33.0ha as ponds... but total disturbance excluding plant & stockpiling area = 63.9ha  132 061m <sup>3</sup> water capacity	X	Listing 983: Activity 27	Will require WULA
2.4. Evaporated salt scraped off surface by scraper				
2.5. Scraped salt loaded by front end loader to haul truck				
2.6. Salt hauled to on pan storage by truck				
2.7. Salt allowed to dry in logistical facility / stockpiling area				



ACTIVITY	AERIAL EXTENT OF ACTIVITY	LISTED ACTIVITY	LISTING NOTICE (April 2017)	WASTE MANAGEMENT AUTHORISATION
2.8. Dried salt sent through sorting assembly. Excess brine sent to Concentration Pond.		X	Listing 984: Activity 17	
2.9. Sorted salt sent through cyclone for final moisture removal. Excess brine sent to Concentration Pond		X	Listing 984: Activity 17	
2.10. Waste Salt Handling	Within 11.8ha on pan stockpiling area			Not required.
2.11. Vehicles using unsurfaced roadways	Existing ±6m wide			
2.12. Use of diesel				
2.13. Use of small workshop	Building measures 55m <sup>2</sup> and includes office and store			
2.14. Potable water trucked in as required (minor volumes)				
2.15. Toilet to Septic Tank with overflow to French Drain				
<b>3. DECOMMISSIONING PHASE ACTIVITIES</b>			GNR983: Activity # 22. Only applies at time of closure	
3.1. Remove final evaporated salt				
3.2. Remove / flatten all evaporation pond side walls.				
3.3. Backfill concentration pond with existing stockpiled material	2 x 2300m <sup>2</sup>			
3.4. Remove all structures foundations and footings (unless required by landowner)				
3.5. Rip surface of logistical facility and stockpiling area to 30 -45cm deep	8.6ha			
3.6. Allow to revegetate naturally	8.6ha			
<b>4. AFTERCARE PERIOD</b>				
4.1. Remove alien vegetation, if present				
4.2. Monitor revegetation success and continue				
4.3. Conduct final performance assessment				
4.4. Lodge closure Application	472.1358ha	X	GNR983: Activity # 22. Only applies at time of closure	
4.5. DMR Grant Closure Application				

Triggered Activity	Description	Notes
Listing 983: Activity 12	The development of— i. dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 m <sup>2</sup> ; or ii. infrastructure or structures with a physical footprint of 100m <sup>2</sup> or more; where such development occurs— a) within a watercourse; b) in front of a development setback; or c) if no development setback exists, within 32m of a watercourse, measured from the edge of a watercourse; — excluding— cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies.	Note that the exclusion cc) “excluding activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies” may lead to Listing Notice 3 activity 14 being applicable depending on whether the considerations for the Northern Cape do apply or not. It is unknown whether the site is located in :  a. National Protected Area Expansion Strategy Focus areas; b. Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;  Note further that Listing Notice 983: Activity 13 does not apply given that the salt pan is considered in-stream storage.
<b>OR</b>		
Listing 985: Activity 14 & 23	The development of— (i) dams or weirs, where the dam or weir, including Infrastructure and water surface area exceeds 10m <sup>2</sup> ; or (ii) infrastructure or structures with a physical footprint of 10m <sup>2</sup> or more; where such development occurs— (a) within a watercourse	See Note above.  Note Listing 985 Activity 23 refers to possible expansion of such dams in excess of 10m <sup>2</sup>
Listing 983: Activity 19	The infilling or depositing of any material of more than 10m <sup>3</sup> into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10m <sup>3</sup> from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving— i. will occur behind a development setback; ii. is for maintenance purposes undertaken in accordance with a maintenance management plan; iii. falls within the ambit of activity 21 in this Notice, in which case that activity applies;	Note that Activity 21 described in exclusion iii refers only to an application for Mining Permit. This application entails a Mining Right and the activity has been considered triggered.
Listing 983: Activity 22	The decommissioning of any activity requiring – i. a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); or ii. a prospecting right, mining right, mining permit, production right or exploration right, where the throughput of the activity has reduced by 90% or more over a period of 5 years excluding where the competent authority has in writing agreed that such reduction in throughput does not constitute closure;	Only applies at time of decommissioning / closure.
Listing 983: Activity 27	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— i. The undertaking of a linear activity; or ii. Maintenance purposes undertaken in accordance with a maintenance management plan.	
Listing 984: Activity 15	The clearance of an area of 20 hectares or more of indigenous vegetation, ...	This listed activity is being considered applicable despite the apparent lack of vegetation on the pan surface, because of the designation in the vegetation map compiled by Mucina and Rutherford (refer figure 1) as Southern Kalahari Salt Pans with associated vegetation description.

Triggered Activity	Description	Notes
Listing 984: Activity 17	Any activity including the operation of that activity which requires a mining right as contemplated in section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— <ul style="list-style-type: none"> <li>a. associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource; or</li> <li>b. the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;</li> </ul>	
Listing 985: Activity 4	The development of a road wider than 4m with a reserve less than 13,5m.... In the Northern Cape... Outside urban areas .... (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority.	This has been included give the location of some of the roads on the pan surface
Listing 985: Activity 10	The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80m <sup>3</sup> : In the Northern Cape... <ul style="list-style-type: none"> <li>ii) Areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland;</li> <li>iii) Outside Urban Areas: <ul style="list-style-type: none"> <li>(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority.</li> </ul> </li> </ul>	This has been included given that possibility that such activity will be triggered. At the moment the there is a 23kl tank and 2 x 2kl tanks, plus drums of oil and lubricants on the site which may, unlikely, take the combined capacity to over 30kl.  Please be aware that we have been unable to download the FEPA Wetlands GIS data and assume that the pan is a sensitive FEPA.

## 7 Description of the activities to be undertaken

(Describe Methodology or technology to be employed, and for a linear activity, a description of the route of the activity)

Refer Para 5 and 6 above.

## 8 Policy and Legislative Context

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT (A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process)	REFERENCE WHERE APPLIED (i.e. Where in this document has it been explained how the development complies with and responds to the legislation and policy context)	HOW DOES THIS DEVELOPMENT COMPLY WITH AND RESPOND TO THE POLICY AND LEGISLATIVE CONTEXT (E.g. In terms of the National Water Act: - Water Use License has/has not been applied for).
National Environmental Management Act	Entire document including public participation	Environmental Authorization from DMR as competent authority
Mineral and Petroleum Resources Development Act	Template for BAR	DMR application and process
2016 Mapping of Northern Cape CBA's (from SANBI website)	Vegetation	DMR application and process
Municipality's SDF and IDP	Need and Desirability (Para 6.1)	End Use informant
National Water Act	Disturbance of water course	Water Use Licence applications required
National Heritage Resources Act	Para 27.1.2	Draft Scoping lodged to SAHRA.
EIA Guideline and Information Document Series' "Guideline on Need and Desirability	Need and Desirability (Para 6.1)	Guideline for information utilized in this document
EIA Guideline 5 Assessing alternatives and impacts	Cumulative Impact Assessment (Para 6.3)	Guideline for information utilized in this document
NEMWA	Not applicable	No application for Waste Licence
Hazardous Substances Act, 1973 (Act 15 of 1973)	Para 32.5	The measures proposed take the Act into account.
Noise and dust regulations and recommendations	Para 32	The mitigation measures proposed take the requirements into account.
Land Use Planning Act, 2014 (Act No. 13 of 2014)	Not applicable until after EA has been (if) granted.	A land use application is required. Whichever form the application is required will be determined in consultation with the Municipality and is only lodged after the EA is (if) granted.
National Dust Control Regulations (Government Notice No. R. 827 of 1/11/2013)	Dust control	Dust control measures to be implemented and monitoring required

## **9 Need and desirability of the proposed activities.**

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

### **9.1 Need and desirability analysis**

The EIA Guideline and Information Document Series' "Guideline on Need and Desirability" dated 2017 has been used to consider this aspect.

The need and desirability does not only focus on the actual mining phase of this site (30 year-long) lifespan but also fully considers the matter of post-mining land use. The rehabilitation of the site will entail the removal or flattening of the pond walls on the pan whilst off pan the rehabilitation will entail the removal of all logistical facilities, the ripping/scarifying of the affected surface and allowing for natural regrowth to occur so that the site can form part of the surrounding veld for grazing.

The following tables are from the published 2017 Guideline on Need and Desirability

### 9.1.1 Securing ecological sustainable development and use of natural resources

1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?		
1.1.	How were the following ecological integrity considerations taken into account:	
1.1.1.	Threatened Ecosystems	<p>The site is divided into off pan and on pan activities. The off pan activities have resulted in the disturbance of some 8.6ha of <i>Gordonia Duneveld</i> Vegetation type (Mucina and Rutherford, 2012). This vegetation type is NOT classified as threatened (in terms of NEMBA). Furthermore this area is classified as Other Natural Area in the CBA mapping of the Northern Cape (2016).</p> <p>The on pan activities take place over an area of ±45ha (including pump locations) in Southern Kalahari Salt Pans vegetation type, despite the lack of vegetation on the salty pan surface. The 2016 CBA mapping for the Northern Cape classifies the pan as being an Ecological Support Area (by virtue of it being a pan). This EAP has been unable to establish the FEPA wetland rating of the pan but has for the purposes of this report assumed it to be a sensitive area.</p> <p>The surface activities at this site do not represent a permanent or significant impact. This can be assessed with a high degree of confidence given the current operational status of the operation. Also remember that there are approved EMPs' for the operation and this scoping report forms part of the amalgamation of those EMPs into one document.</p>
1.1.2.	Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure	
1.1.3.	Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs"),	
1.1.4.	Conservation targets.	<p><u><i>Gordonia Duneveld:</i></u> Least threatened. Target 16%. Some 14% statutorily conserved in the Kgalagadi Transfrontier Park. Very little transformed. Generally low erosion, but some areas with spectacular destabilisation of normally vegetated dunes (through local overstocking) favoured by photographers. Erosion is normally very low.</p> <p><u><i>Southern Kalahari Salt Pans:</i></u> Least threatened. Target 24%. About 8% statutorily conserved in the Kgalagadi Transfrontier Park. The vegetation of the pans is subject to natural degradation/regeneration cycles controlled by concentration of grazing animals (antelopes in particular).</p>
1.1.5.	Ecological drivers of the ecosystem.	The main ecological drivers are located along the fringes of the pan (interface between the hinterland and pan surface). In this case, no further disturbance of that interface will take place. The pan does rarely flood due to rainfall.

1.1.6.	Environmental Management Framework	No EMF was located.
1.1.7.	Spatial Development Framework, and	<p>Remember that this operation and its approved EMP preceded the publication of the SDF. The SDF states that it uses biodiversity as the guiding principle in the Spatial Planning Category definition. No map could be found that specifically covers the Mining Right area in the SDF but based on a perusal of the documentation, the site would either be classified as:</p> <ul style="list-style-type: none"> <li>• Agriculture (C.a.2)</li> <li>• Other Natural Areas (B.b.3)</li> </ul> <p>In respect of the Agricultural SPC, the following is quoted from the SDF:  <i>Urban development on any non-urban SPC should be excluded where such a development is outside of the urban edge, whereas the following SPCs are seen as complementary to Agriculture (with all other legislative processes being complete and in place) and the rezoning to being any of the following, can be considered under specific conditions and approvals:</i>  .....) E.e.1 Extractive industry</p> <p>In respect of other Natural Area, the following is quoted for the SDF:  <i>If a development is considered across an area that is covered with this category, the relevant environmental department should be contacted for inputs and to indicate whether they will require any environmental assessment. Developments should be encouraged to stay clear from these areas or at least consider it in their site layouts.</i></p> <p>The point is that any development proposed within these areas must undergo all legislated processes and include input from all relevant parties before decision is made.</p>
1.1.8.	Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).	Not applicable at this small site
1.2.	<p>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity?  What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?  What measures were explored to enhance positive impacts</p>	<p>This development has no doubt resulted in some disturbance of ecosystem but that impact is clearly insignificant. The approved EMPs, this document as well as the upcoming EMP have and will continue to aim to reduce or eliminate any negative impact which occurs from this site.</p>

1.3.	How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The only real risk of pollution to the site and surrounds is through hydrocarbon pollution. All mitigation and monitoring efforts aimed at minimising or preventing any negative impacts are contained in future EIA/EMP.
1.4.	What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?	<p>Waste volumes will be very low at this site. The waste streams will be:</p> <ul style="list-style-type: none"> <li>- Waste from personnel amenities</li> <li>- Domestic Waste</li> <li>- Industrial Waste (including Hydrocarbon Waste)</li> </ul> <p>All waste is and will continue to be disposed off site as prescribed in upcoming EIA/EMP</p>
1.5.	How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The draft Scoping Report will be submitted to SAHRA (on the SAHRIS system) and any heritage studies required will be conducted. Note that no further disturbance is expected.
1.6.	<p>How will this development use and/or impact on non-renewable natural resources?</p> <p>What measures were explored to ensure responsible and equitable use of the resources?</p> <p>How have the consequences of the depletion of the non-renewable natural resources been considered?</p> <p>What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The application is for salt which is a renewable resource.</p> <p>In terms of equitable use of the resource, the applicant has met all the legal requirements of the mining charter and in respect of responsible use of the resource, the application is subject to all Mineral and Environmental legislation and the public participation associated therewith. The application is subject to comment and input from several commenting authorities as well as specialist input in aspects of environment determined by public input and / or legislation.</p>



1.7.	<p>How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?</p> <p>Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds?</p> <p>What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources?</p> <p>What measures were taken to ensure responsible and equitable use of the resources?</p> <p>What measures were explored to enhance positive impacts?</p>	<p>The salt which is being mined at this site is in fact a renewable resource. The other renewable resource is groundwater. The use of such water is currently part of a WUL Application with DWS in Upington. Such WUL application is being conducted by Ms D Fordham of Sharples Environmental Services. The WUL application process will determine the nature of the impact on groundwater regime in the area. The brine water pumped from the pan is extremely brackish in any event and cannot be used for human or animal consumption (and is unlikely to sustain crops if there were any in the area).</p>
1.7.1.	<p>Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</p>	<p>This mining operation does not lower the dependency on use of resources to maintain economic growth.</p>
1.7.2.	<p>Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources against a proposed development alternative?)</p>	<p>The use of brine and the harvesting of salt represent a renewable function and this operation could in theory continue in perpetuity. The proposed final rehabilitation of the site results in no permanent or residual impact for future generations.</p>
1.7.3.	<p>Do the proposed location, type and scale of development promote a reduced dependency on resources</p>	<p>No.</p>
1.8.	<p>How were a risk-averse and cautious approach applied in terms of ecological impacts</p>	<p>Impacts of mining have been subject to earlier approved EMPs. The operation is now again subject to full public participation in the amendment of the EMP so that the EMP can serve a single operation as opposed to the separate operations which is now the case.</p>
1.8.1.	<p>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p>	<p>None known.</p>
1.8.2.	<p>What is the level of risk associated with the limits of current knowledge?</p>	<p>By applying the 30 year experience of the EAP in salt mining operations, it is considered that knowledge gaps are small enough to reduce risk to acceptably low levels.</p>

1.8.3.	Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	Impacts of mining have been subject to earlier approved EMPs. The operation is now again subject to full public participation in the amendment of the EMP so that the EMP can serve a single operation as opposed to the separate operations which is currently the case.  Note that to date, the Scoping process has not yielded any requirement for additional specialist studies, although it is with a high degree of confidence that SAHRA will require heritage impact assessment conducted by specialist.
1.9.	How will the ecological impacts resulting from this development impact on people's environmental right in terms following:	
1.9.1.	Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	The negative impacts have been identified in part 14 of this document. Measures taken to avoid impacts are contained in Part 22.9 Proposed measures taken to minimise, manage and remedy negative impacts are contained in para 22.9.
1.9.2.	Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?	Not applicable.
1.10.	Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socioeconomic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?	The proposed rehabilitation methodology will result in a post mining land use which is very similar / same as current land use/ state of the surrounding land. Whilst mining is underway the impacts in socio – economic sense will be in respect of landowner, compensation, mine owner compensation, limited employment opportunities, positive impact on down the line industries and suppliers, local / regional / national availability of salt
1.11.	Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/ targets/ considerations of the area?	It is most likely that the impact of continued mining will be insignificant if all management measures are undertaken (assessed as part of the scoping phase).
1.12.	Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the “best practicable environmental option” in terms of ecological considerations?	Any potential environmental impacts (vegetation (and others identified during scoping)) that are perceived to possibly be significantly impacted upon or about which insufficient information is available would be subjected to specialist study. AT this stage no specialist study has been required (although it is expected that HIA will be required by SAHRA)  It is unlikely that mining of any resource would result in the “best practicable environmental option” in terms of ecological considerations but it must be remembered that there are other considerations in respect of the socio-economic and built environment which also have a bearing.

1.13.	Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	Cumulative impact has been provisionally described as insignificant on all aspects of the ecology (as described in para 9.2).
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## 9.1.2 Promoting justifiable economic and social development

2. Promoting justifiable economic and social development		
2.1.	What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?:	Refer also para 27.1
2.1.1.	The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,	Refer line item 1.1.7 in table in Para 9.1.1.  The operation does provide employment opportunities (albeit limited) to residents in the region, as well as down the line indirect benefits to a range of suppliers, thereby meeting one of the socio-economic imperatives of the IDP, viz employment
2.1.2.	Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),	Not applicable
2.1.3.	Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.), and	Salt mining currently takes place at this site. The site is extremely isolated and the only other feasible off pan land use is low level grazing for small stock units.
2.1.4.	Municipal Economic Development Strategy ("LED Strategy").	The Municipality, along with many others suffers from low employment rates within which consideration the direct and indirect employment is important. Furthermore, the enforced Social and Labour Plan commitments in respect of community development also must not be discounted.
2.2.	Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?	Refer Para 23.1.1
2.2.1.	Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	The Municipality, along with many others suffers from low employment rates within which consideration the direct and indirect employment is important. Furthermore, the enforced Social and Labour Plan commitments in respect of community development also must not be discounted.
2.3.	How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities	The needs and interests of the community are provided for through direct (although limited) and indirect employment, local, regional and national provision of salt, impact of the Social and Labour Plan, lack of ecological impact of the operation Including lack of noise and dust impact on communities.

2.4.	Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? Will the impact be socially and economically sustainable in the short- and long-term?	Yes. The salt mine is to all intents and purposes a permanent operation given the renewable nature of the brine. As such, there is no impact on future generations
2.5.	In terms of location, describe how the placement of the proposed development will:	
2.5.1.	result in the creation of residential and employment opportunities in close proximity to or integrated with each other	The site is very isolated and the staff members all live in single quarters on site.
2.5.2.	reduce the need for transport of people and goods	It will not require commuting
2.5.3.	result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	Not applicable.
2.5.4.	compliment other uses in the area,	Not applicable
2.5.5.	be in line with the planning for the area,	The SDF, EMF and IDP all mention mining but only to preclude its location. They do not discuss where mining should take place except to state that when it is contemplated then the applications must follow Integrated Environmental Management principles.
2.5.6.	for urban related development, make use of underutilised land available with the urban edge,	Not applicable
2.5.7.	optimise the use of existing resources and infrastructure	Yes. This is an extension of existing operation, not a new site which would potentially result in doubling of impacts
2.5.8.	opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	Not applicable
2.5.9.	discourage "urban sprawl" and contribute to compaction/densification,	Not applicable
2.5.10.	contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	Not applicable
2.5.11.	encourage environmentally sustainable land development practices and processes	This is mining and although mining per se cannot usually encourage such sustainable land development practices and processes, this is not true of salt mining from brine. Furthermore it can be conducted in such a way as to minimise the impact on the environment
2.5.12.	take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),	Not applicable. This is a Mining Right and geology dictates the location of such operations.
2.5.13.	the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),	It may be argued that grazing could provide socio-economic returns, but those pale into insignificance when compared with the mining's economic potential. In addition, the proposed mining does not preclude post mining future use of the site for grazing.
2.5.14.	impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	The draft Scoping Report has been submitted to SAHRA (on the SAHRIS system) and any heritage studies required will be conducted. Note that no further disturbances are expected.
2.5.15.	in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	Not applicable.

2.6.	How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	
2.6.1.	What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	None Known.
2.6.2.	What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?	There is no risk to these socio-economic aspects through the proposed mining at the site.
2.6.3.	Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	Not applicable.
2.7.	How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following	
2.7.1.	Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts	No negative impacts have been identified in part 14 of this document given that the same current operators will continue their task under the mining right. In the monthly mine health and safety meetings this element is and will continue to be dealt with as a matter of course.
2.7.2.	Positive impacts. What measures were taken to enhance positive impacts?	Proposed measures taken to enhance positive impacts (socio-economics) are contained in para 23.1.1
2.8.	Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?	This assessment considers the mine from a holistic perspective to ensure that mining does not result in unacceptable ecological impact.
2.9.	What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations	Not applicable.
2.10.	What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?	The company meets the requirement for BEE shareholding.
2.11.	What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?	The applicant is an existing compliant company and all legislation has been adhered to.
2.12.	What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	All mines are subject to Health and Safety legislation (Mine Health and Safety Act 29 of 1996). Such prescriptions are not within the ambit of this document but are strictly monitored by DMR.
2.13.	What measures were taken to:	

2.13.1.	Ensure the participation of all interested and affected parties.	Refer Part 13 for full record of Public Participation
2.13.2.	Provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation.	Refer Part 13 for full record of Public Participation
2.13.3.	Ensure participation by vulnerable and disadvantaged persons.	The application will be advertised in local newspaper and advertised on posters at the gate of the existing mine
2.13.4.	Promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.	None
2.13.5.	Ensure openness and transparency, and access to information in terms of the process.	Refer Part 13 for full record of Public Participation
2.13.6.	Ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and,	Refer Part 13 for full record of Public Participation
2.13.7.	ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted.	Refer Part 13 for full record of Public Participation
2.14.	Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?	Not applicable to this kind of application
2.15.	What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	All mines are subject to Health and Safety legislation (Mine Health and Safety Act 29 of 1996). Such prescriptions are not within the ambit of this document but are strictly monitored by DMR.
2.16.	Describe how the development will impact on job creation in terms of, amongst other aspects:	
2.16.1.	the number of temporary versus permanent jobs that will be created,	No new jobs are created will be created above those already employed at the site and in indirect positions
2.16.2.	whether the labour in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),	Current employed is locally sourced and will remain so.
2.16.3.	the distance from where labourers will have to travel,	The site is very isolated and the staff members all live in single quarters on site.
2.16.4.	the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), and	The mining itself has a very small impact on the job market but down the line employment also takes place. The impacts of the operation will be tested in the scoping phase but are unlikely to be significant based on current mining impacts which are known
2.16.5.	the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	The proposed mining operation will continue to provide employment for approximately 19 direct job positions.
2.17.	What measures were taken to ensure:	

2.17.1.	that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	Refer Part 13 for full record of Public Participation which includes all relevant State Departments at all levels of governance
2.17.2.	that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures	Not applicable
2.18.	What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?	Environmental impact has been assessed to be largely insignificant in all aspects of the environment. Specialist input may be sought to confirm this. The proposed project has and will continue to be subject to extensive public participation to ensure all public are aware of and have input into the planning and approval process.
2.19.	Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	The management of operational impact is the responsibility of the applicant with monitoring and auditing largely by independent parties. The Mineral legislation requires that Closure be granted before the applicant can relinquish responsibility for the site. Such closure process is arduous and requires enforced participation by and satisfaction of relevant State Departments.
2.20.	What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?	In terms of operational control of environmental impact and pollution, the upcoming EMP will prescribe measures to be put in place to monitor and then mitigate / manage or avoid any known or unexpected impact.  All Mining Right's holders are responsible to annually update a calculation to determine the costs of Immediate Closure of the site. Such calculation is based on DMR Guideline and the value of the fund must be provided to the DMR either in form of cash or by Bank Guarantee or other. Should the holder "disappear", then the fund is used by the State to rehabilitate the site.
2.21.	Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?	The only feasible alternative applicable to this application is the no go option. This will be considered if the specialist studies show that significant impact would result from the proposed development.
2.22.	Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?	Refer Para 9.2

## **9.2 Cumulative Impact Assessment**

The assessment of cumulative impacts is not applicable in this case given the operational nature of the project. No new impacts are anticipated in future through continued mining at this site.

## **10 Period for which the environmental authorisation is required**

Despite the fact that the operation could continue in perpetuity, the Environmental Authorisation is sought for 30 years to coincide with the maximum permissible period for a Mining Right.

## **11 Description of the process followed to reach the proposed preferred site.**

NB!! – This section is not about the impact assessment itself; It is about the determination of the specific site layout having taken into consideration (1) the comparison of the originally proposed site plan, the comparison of that plan with the plan of environmental features and current land uses, the issues raised by interested and affected parties, and the consideration of alternatives to the initially proposed site layout as a result.

The current site layout is the result of years of operation at the site. No additional planning has thus been required during the pre-scoping phase. Should continued Public Participation yield any changes to the preferred site layout, then these will be assessed in the EIA/EMP phase of the application.

Note further that the if the proposed consolidation and extension is approved, that no logistical facilities will be duplicated at the southern ponds (i.e. the Gordonia site) but that a washing and crushing leg as well as cyclone may be established at the currently prepared area on the pan. In addition, no ponds or logistical facilities will be developed on Portion 18 with the plan being that a pumps station or 2 may be installed on that portion.

## **12 Details of all alternatives considered.**

Alternative consideration in respect of extension of existing operations must always take into account the apparent advantages of extending an existing site as opposed to locating a brand new site. The advantages relate to the existing knowledge of the site as well as there being no requirement to duplicate infrastructure at another site. Furthermore, in the case of mining it must always be remembered that alternative sites cannot be selected as easily as for other types of developments. The geology dictates where the site can be located. So, the development of a brand new operation is confounded by:

- Finding suitable geological formation / material
- Finding an area which is not sterilized by surrounding / on site land uses
- Finding a site with limited visual impact

### **12.1 Property on which or location where it is proposed to undertake the activity;**

The holder has extensive knowledge of the area and surrounds and given the context described in Para 12 above, has lodged an application for Prospecting Right in respect of salt on adjacent pan (some 10k east) through sister company with the aim of pumping brine from that eventual operation (if approved) to the evaporation ponds on Grootwitpan. The Mining Right application has not yet been lodged as the company



awaits the Right to prospect.

### **12.2 Type of activity to be undertaken;**

Continued salt mining is the proposed activity. In terms of the mining company's business there can be no other alternative activity. It is important to note that the land parcel can be returned to its pre-mining "alternative".

### **12.3 Design or layout of the activity;**

The mine plan as seen in Figures 4 and 5 and described in para 5.4 is based on the years of operation at the site.

### **12.4 Technology to be used in the activity;**

Salt mining technology is very simple and has remained the same for decades. The use of scrapers, dumpers, front-end loaders will continue to move the salt to the washing, crushing and sorting plants.

### **12.5 Operational aspects of the activity;**

The existing salt mining project has been in operation for several years and any alternative operational aspect would have been considered and implemented if it were a more suitable alternative.

### **12.6 Option of not implementing the activity.**

Provided rehabilitation takes place a high level of compliance with the provisions of any future specialist recommendation and EMP prescriptions, then there is no reason why the activity should not go ahead.

The aspect of no go project also goes against the principle of optimization of resource as espoused in the MPRDA.

## 13 Details of the Public Participation Process Followed

Public participation has taken place and will continue to take place in the following manner and programme:

- 1) The **landowner** is the applicant. All required resolutions have been submitted with the application.
- 2) **Surrounding landowners:** These were sent copies of this Scoping report by registered mail or Email depending on their preference to be determined by telephone call. Should they have requested a meeting, then such consultation would have taken place. Refer Figure 6 below for map of surrounding landowners' farms – Refer Appendix 3 for proof.
- 3) **State Departments:** Registered mail / email was sent to the following State departments and NGOs- Refer Appendix 3:
  - a. Department of Environment & Nature Conservation
  - b. Department of Water and Sanitation
  - c. Dept. of Agriculture Forestry and Fisheries
  - d. Municipality – Manager's Office and Environmental Section
  - e. Land Claims Commissioner.

Note that the Scoping report will be sent to SAHRA on the SAHRIS system, and based on similar applications lodged on SAHRA, it is anticipated that Heritage Impact Assessment will be called for, despite the lack of further planned disturbance.

- 4) **Broader public** were be notified in 3 ways – Refer Appendix 3 for proof:
  - a. By way of newspaper advert in local newspaper
  - b. By way of posters placed at project entrance. Posters will measure 62 x 40cm as per NEMA regulations.
  - c. Though notification of the local councilor.

Please note that each of these notifications contained details as to:

- How to contact the EAP
- How to get to see a copy of the draft Scoping report with notice that 2 copies of the draft Scoping Report will be available at the Upington Public Library or available per email or hard copy by post
- If there is sufficient interest then a public open day will be arranged.

- 5) Receipt of all comments in respect of the draft Scoping Report.
- 6) Compilation of final Scoping report with copies of all received comments.
- 7) Lodging to of final Scoping Report to DMR
- 8) Late comments will be entertained and submitted to the DMR

Future Public Participation will consist of:

- 1) Finalization of a draft EMP including:
  - a. Specialist studies if required.
  - b. Comments in respect of the draft scoping report
- 2) Distribution of draft EIA-EMP to registered I&AP's as well as all State Departments and NGOs listed above for 30 day commenting period
- 3) If comments received on draft EIA/EMP make material change to EMP, then redistribution of 2<sup>nd</sup> draft version of the EIA-EMP will take place
- 4) Lodging of Final EMP to DMR with all comments and changes made as required.

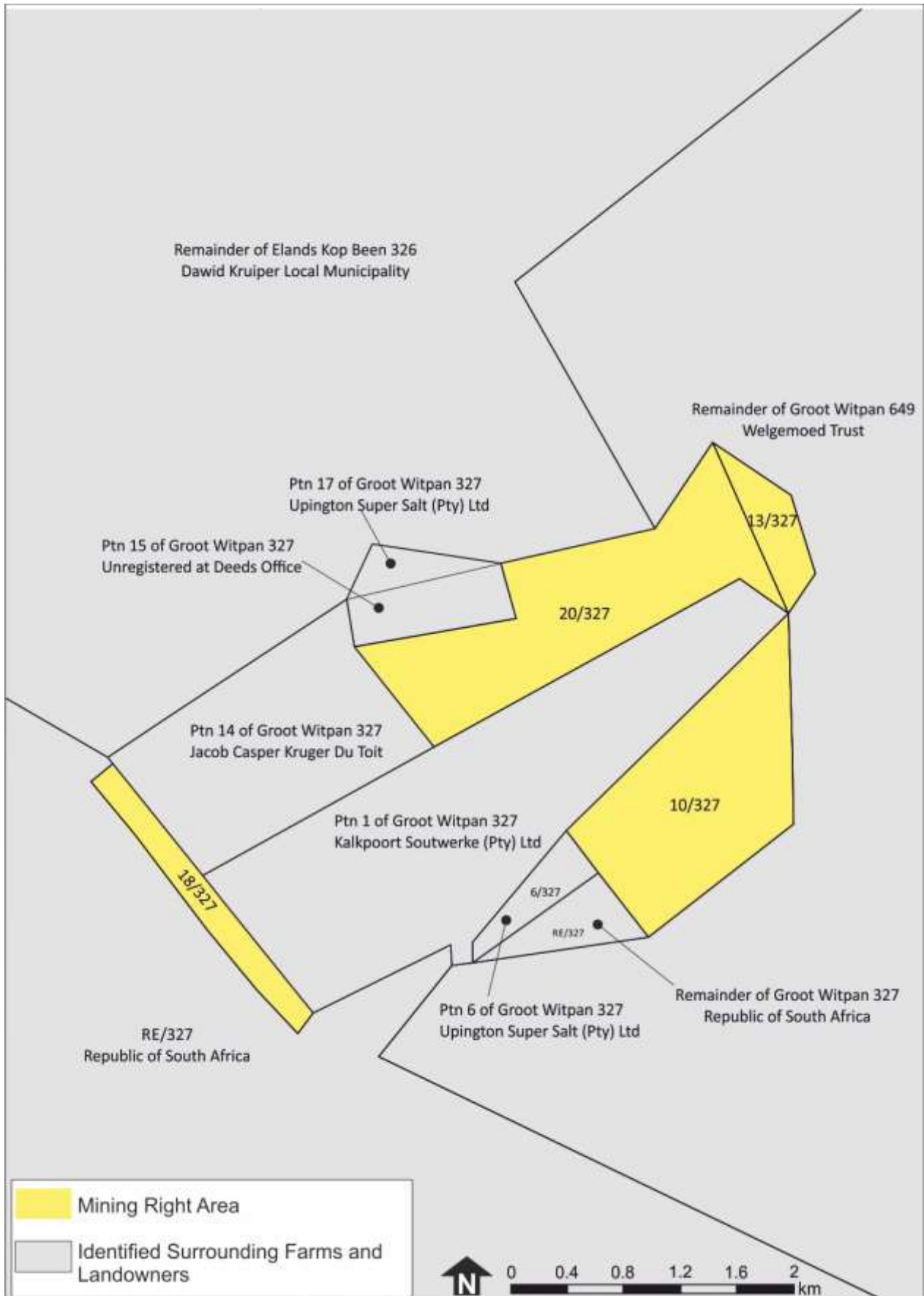


Figure 6: Surrounding Landownership

<b>Interested and Affected Parties:</b> List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Para in this report where the issues / responses were incorporated.</b>
<b>Landowner</b>					
Industrial Salt (Pty) Ltd is the applicant		NA	Landowner is applicant		
<b>SURROUNDING LANDOWNERS</b>					
Remainder of Elands Kop Been 326 Dawid Kruiper Municipality – Comment requested from MM – see below					
Remainder of Groot Witpan 649 Welgemoed Trust			UNABLE to locate. Will continue trying		
Portions 6 & 17 of Groot Witpan 327 Upington Super Salt (Pty) Ltd Tel: 054 337 5500 Care of Admin manager Ms Pearl van Wyk mining@blaauwsgroup.co.za	Email	22/7/2020	Letter of no objection		
Portion 14 of Groot Witpan 327 Jacob Casper Kruger du Toit PO Box 1228 Upington 8810 Tel: 083 688 5021 Jacob@kpsout.co.za	Email	None			
Portion 1 of Groot Witpan 327 Kalkpoort Soutwerke Harry van Zyl – 072 736 9870 harry@kpsout.co.za	Email	22/7/2020	They requested the following: <ul style="list-style-type: none"> <li>• Special Studies</li> <li>• Geohydrological Studies/Report</li> <li>• Proof of application for amended Water Usage Licence</li> <li>• The amount water usage which has been applied for</li> </ul>	These will be supplied in the draft EIA/EMP for his comment. Note that the WULA is underway and has been lodged by other consultants	
Remainder and Ptn 15 of Groot Witpan 327 Republic of South Africa Comment requested from DPW – see below	Email	None			
<b>Municipal Representatives</b>					
Dawid Kruiper Municipal Manager: Civic Centre, Mutual St, Upington 8801 Name: E Ntoba Tel: 054 338 7001 Email: manager@kharahais.gov.za	Reg Mail & Email	None			

Interested and Affected Parties: List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Para in this report where the issues / responses were incorporated.
<b>Organs of state and NGO's (Responsible for infrastructure that may be affected Roads, Eskom, Telkom, DWS etc.)</b>				
Department of Environment and Nature Conservation : Northern Cape Private Bag X6120, Kimberley, 8301 Tel 053 807 7300 Head of Department	Reg Mail	None		
Department of Environment and Nature Conservation : Northern Cape Private Bag X16 Springbok 8240 Tel 027 718 8800 No head of Department at present. Emails sent to: H Hanekom & S B Maqolo <a href="mailto:Hannekehanekom@yahoo.com">Hannekehanekom@yahoo.com</a> <a href="mailto:sbmaqolo@gmail.com">sbmaqolo@gmail.com</a>	Reg mail and 2 email	None		
Department of Water and Sanitation: Mr Abe Abrahams: Chief Director: Northern Cape Private Bag X6101 KIMBERLEY 8300 Tel: (053) 830 8800/6 7600 Cell: 082 883 6741 <a href="mailto:AbrahamsA@dws.gov.za">AbrahamsA@dws.gov.za</a>	Reg mail Email	None		
DWS Northern Cape Region 28 Beaconsfield Road Kimberley 8301 Ms V Ramugondo <a href="mailto:ramugondov@dws.gov.za">ramugondov@dws.gov.za</a>	Reg mail & email	None		
Dept. of Agriculture Forestry and Fisheries: Head of Department: Mr Thebe Thebe 072 991 8114 <a href="mailto:tthebe@ncpg.gov.za">tthebe@ncpg.gov.za</a>	Email	None		
Department of Public Works Ruwayda Baulackay Private Bag X5002, Kimberley, 8300 Tel: 053 838 5202 Cell: 083 459 7602 Email: <a href="mailto:ruwayda.baulackay@dpw.gov.za">ruwayda.baulackay@dpw.gov.za</a>	Email	None		
<b>Communities</b>				

<b>Interested and Affected Parties: List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Para in this report where the issues / responses were incorporated.</b>
Community of Uppington (Advertised in Gemsbok)		27/07/2020	S du Plessis expressed interest to provide dust suppression should it be required – Refer Appendix 4		
Commission On Restitution Of Land Rights: Regional Land Claims Commission: Northern Cape. Tel: (053) 807 5700 Ryan.oliver@drdlr.gov.za	Email	24/08/2020	Acknowledgement of receipt of request		
Traditional Leaders					
<b>Other Competent Authorities</b>					
SAHRA/HNC Lodgement on Heritage electronic lodging system: SAHRIS		None yet			
DMR:NC Regional Manager					
<b>OTHER AFFECTED PARTIES</b>					
<b>INTERESTED PARTIES</b>					

Note that final comments must be in within 30 days and will be forwarded to the DMR as soon as possible after that.

## 14 The Environmental attributes associated with the site: Baseline Environment

### 14.1 Type of environment affected by the proposed activity.

#### 14.1.1 Topography

Topography usually has a bearing on visual impact. In this case, there is no visual impact on surrounding land user, given the extreme isolation of the site.

The topography is typical Kalahari Dune topography with the occasional pan or “vloer” forming locally inward draining basins. The surrounding sand covering can get very deep, up to 120m in places.

The pan was probably formed through the scouring action of the winds causing depressions where localised run-off has resulted in accumulations of clay particles and soluble minerals. Continuous scouring of the pan has enlarged the area and given rise to the hard salt crust on the pan which prevents the formation of sand dunes on the pan surface.

Existing impacts in respect of topography have arisen through:

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Removal of material outside of pan to serve pond walls on pan	Life of mine (most likely permanent)	Insignificant	Could be reversed through backfilling but most likely rehabilitated through shaping	No	Can be mitigated
Development of the pond walls on pan surface up to 1.5m in height	Life of mine	Moderate	Must be reversed through spreading or removal after mining	No	Must be managed

Other insignificant impacts on topography have arisen through:

- Waste salt dumping heaps – long term but temporary
- Entrance road construction – Life of mine
- Salt mining stockpiles - Temporary

#### 14.1.2 Visual Impact

None, except negligible impact to anyone who enters the confines of the basin.

#### 14.1.3 Soil

The Kalahari Dunes consist of red coloured sand dunes mostly stabilised by grassy vegetation. There is very little to differentiate the orthic A horizon (upper sand layer deplete of nutrients) and the lower lying sands and these are often mixed during droughts when mixing will occur through shifting sand dunes.



In the case of this mine, there has been no topsoil removal prior to development of the disturbed off-pan areas. But any topsoil which would have been removed and stockpiled now would not in any event serve as topsoil in 30 years' time when decommissioning rehabilitation could take place at this mine's extension.

These sands have limited growth medium potential due to high concentration of minerals as well low water retention capability. This together with low rainfall limits success of any revegetation intervention.

The potential for wind erosion of the sands is aggravated by the strong winds and some erosion is visible in the vicinity of the mine office and next to the access road.

Impacts on soil which have occurred to date are as follows:

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Excavation of sandy material outside of pan to serve pond walls on pan	Life of mine (most likely permanent)	Insignificant	Could be reversed through backfilling but most likely rehabilitated through shaping	No	Can be mitigated
Disturbance / trampling and compaction of soil in off pan areas for logistical facilities and accommodation	Life of mine	Insignificant	Must be reversed through ripping / scarification post mining	No	Can be mitigated

#### 14.1.4 Pre – Mining Land Capability

The site is located in the Kalahari Dune system which is characterised as follows in terms of agricultural potential:

- Rainfall between 50-150mm per year (mostly late summer)
- Extremely high temperatures, strong dry winds, saline water and high evaporation combine to preclude crop production.
- No irrigation takes place
- Livestock watering a challenge with often poor quality water available.
- Majority of soils have poor moisture retention, low pH and low nutritive quality
- Land capability is thus non arable low potential grazing land
- ...veld has an extremely low carrying capacity ( $\pm 80\text{ha/AU}$ ).

There are 2 land units to consider:

Off pan areas: These areas are used for grazing by livestock and game farming. The carrying capacity is extremely low (at  $\pm 80\text{ha/au}$ ). Current impact on this land unit has occurred as follows:

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Loss of grazing: Disturbance by logistical facilities and accommodation totals approx. 8.6ha	Life of mine	Insignificant	Yes	No	Must be rehabilitated post mining

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Loss of grazing: Off pan Access road: 4-6m wide to 2.2km from nearest public road	Life of mine	Insignificant	Can be reversed. May be retained	No	Can be rehabilitated post mining

On pan areas: Most of the disturbance area is on the pan with approximately 75.7ha disturbed for the ±20 ponds and the processing and stockpiling area. The pumps on the pan also lead to very insignificant impact.

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Loss of pan function: Disturbance by pond development and processing and stockpiling totals approx. 75.7ha (out of total pan area of 1 108ha)	Life of mine	Insignificant	Yes	No	Must be rehabilitated post mining

#### 14.1.5 Natural Vegetation

The main sources of information typically used at Scoping Stage are:

- Mucina and Rutherford mapping (2006): Vegetation of South Africa, Lesotho and Swaziland.
- CBA mapping from SANBI's mapping of the 2016 Northern Cape CBA Mapping.
- The classification of the vegetation types according to Critically Endangered, Endangered, Vulnerable or Least Threatened classification in terms of NEM: BA.

The Mucina and Rutherford mapping (Refer Figure 7) shows the Mining Right area to be located within 2 vegetation types viz. Gordonia Duneveld and Southern Kalahari Salt Pans.

According to National Environmental Management Biodiversity Act's schedule in respect of the National List of Ecosystems that are Threatened and in Need of Protect published in GN1002 (9/12/12), both these are classified as least threatened.

#### Conservation Targets:

- *Gordonia Duneveld:*  
Least threatened. Target 16%. Some 14% statutorily conserved in the Kgalagadi Transfrontier Park. Very little transformed. Generally low erosion, but some areas with spectacular destabilisation of normally vegetated dunes (through local overstocking) favoured by photographers. Erosion is normally very low.
- *Southern Kalahari Salt Pans:*  
Least threatened. Target 24%. About 8% statutorily conserved in the Kgalagadi Transfrontier Park. The vegetation of the pans is subject to natural

degradation/ regeneration cycles controlled by concentration of grazing animals (antelopes in particular).

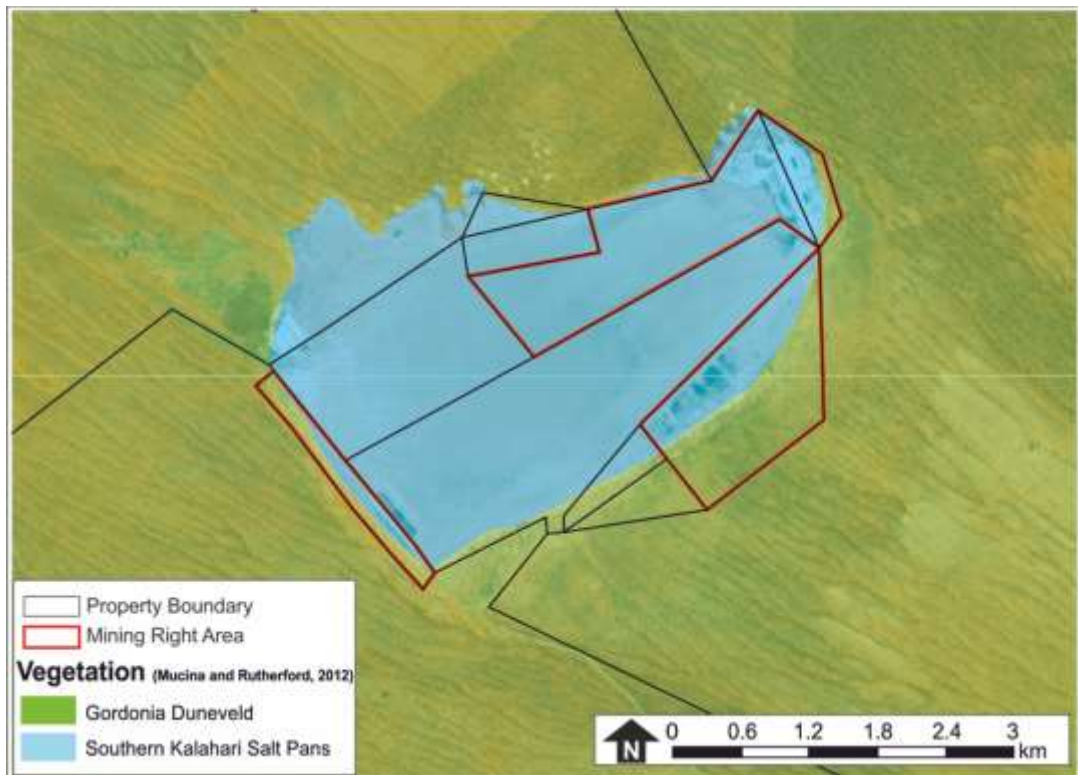


Figure 7: Vegetation Classification (Mucina and Rutherford)

Figure 8 shows the CBA mapping according to SANBI’s 2016 mapping. It shows that the off pan activities are located on “Other Natural Area” classification whilst on pan activities are in Ecological Support Area. None of the activities are located in a CBA.

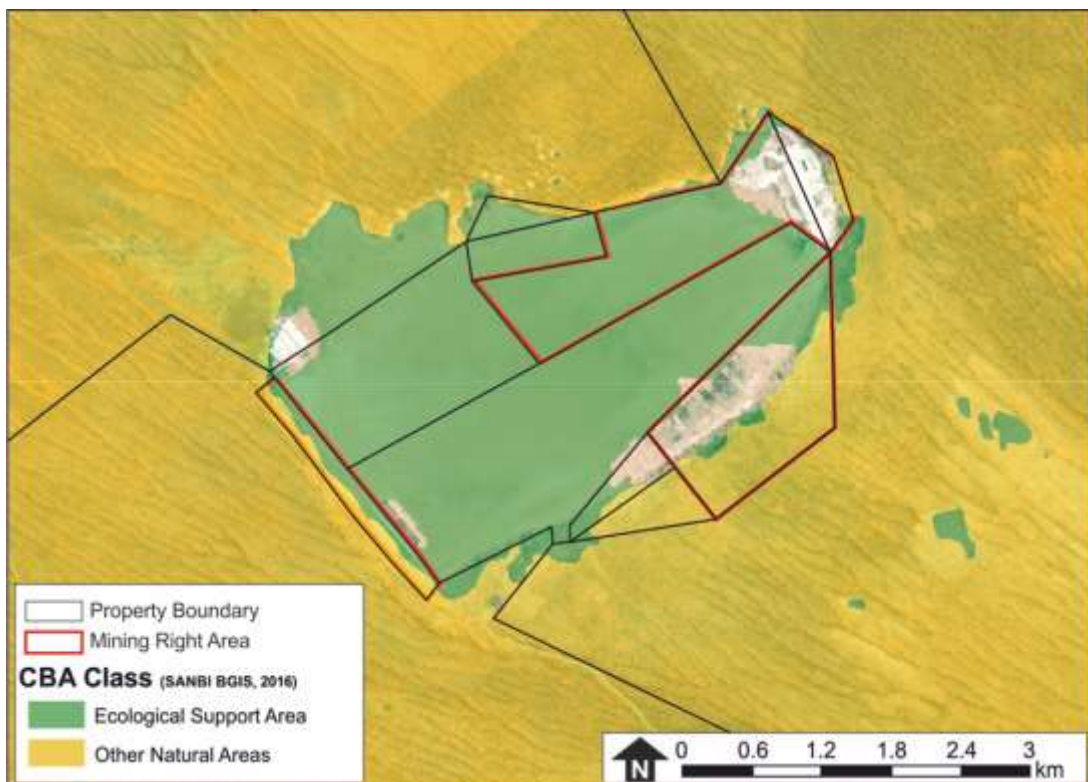


Figure 8: CBA Data - 2016 NC CBA Mapping

There are a number of Swart Haak (*Acacia milifers* subs. *Detinens*) specimens around the mining site. In the salty soils the *Salsola calluna* (Rooi loot ghanna) is common. Although an alien species, it is not recommended that the plant be removed due its ability to bind the soils around the pan (besides it is a source of food for local fauna). There are no sensitive or endangered plant species on or around the site (EMP, 2009).

**14.1.6 Animal Life**

Vast expanses of the same vegetation surrounding the site provide a habitat suitable for species typical of the area. These include rodents (rats, mice, shrews etc.), reptiles (snakes) birds and insects. The large scale of the habitat type when compared to the extent of the existing activities negates any significance of any impact in this regard.

**14.1.7 Surface Water**

There are no water courses, dams, drainage channels, streams, rivers or wetlands on the site (although the pan is classified as a wetland in terms of NFEPA mapping).

So, given the disturbance of a water course (i.e. pan surface) by the mining it is incumbent on the applicant to lodge Water Use Licence Application. This application is already in progress. There have been some issues with this application but the status thereof will be reported on in more detail in the draft EIA/EMP.

No other surface water features are disturbed by the salt mining activities.

Nature and extent of existing impact	Duration	Significance	Extent to which impact can cause or be:		
			reversed	irreplaceable loss of resource	avoided, managed or mitigated
Loss of pan function: Disturbance by pond development and processing and stockpiling totals approx. 75.7ha (out of total pan area of 1 108ha)	Life of mine	Insignificant	Yes	No	Must be rehabilitated post mining

**14.1.8 Ground Water**

The pan is located in Quaternary Basin D42D. Notwithstanding the general authorisation for that basin, the holder is required to obtain WUL for the abstraction of groundwater. This application is already in progress. There have been some issues with this application but the status thereof will be reported on in more detail in the draft EIA/EMP.

It is most likely that a full groundwater study will be required as part of that application but it can be stated that the impact of continued groundwater abstraction from the pan confines is insignificant given:

- Over 30 years of abstraction which has already taken place of this renewable resource
- The pumping only takes place to depths of 20-30m and only impacts on a pan based “perched” water table and not a regional aquifer which will be at a much deeper level
- The absence of boreholes surrounding the site
- The very poor quality of the water precluding any use as drinking, stock watering or cultivation.

Portion 18 of Groot Witpan 327 has been included in this application as an area where additional pumps may be located. No evaporation ponds or logistical facilities will be developed on Portion 18.

#### 14.1.9 Air Quality (Dust)

(a) *Dust standard applied.*

##### NEM:AQA

The stipulations in the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) with revisions in Government Notice R.827, published in Government Gazette No. 36974 of 1 November 2013 were used in this dust fall monitoring programme and report.

A Standard for the acceptance dust fall rate is set out in Table 1 for residential and non-residential areas.

Restriction Area	Dust fall rate (D) (mg.m <sup>-2</sup> .day <sup>-1</sup> , 30-day average)	Permitted frequency of exceeding dust fall rate
Residential	D < 600	Two within a year, no sequential months
Non- Residential	600 < D < 1 200	Two within a year, no sequential months

##### SANS1929:2004

Attention is drawn to paragraph 4.8.4 of the extract from SANS regarding recognition that certain enterprises need to operate within “band 3” by virtue of “the practical operation of the enterprise...” provided that the best available control technology is applied for the duration”.

#### “DUST FALL STANDARDS SANS 1929:2004

##### 4.8 Dust Deposition

###### 4.8.1 General

The four-band scale to be used in the evaluation of dust deposition is given in 4.8.2 and target, alert and action levels indicated in 4.8.3. Permissible margins of tolerance are outlines in 4.8.4 and exceptions noted in 4.8.5

###### 4.8.2 Evaluation Criteria for Dust Deposition

Dust deposition rates shall be expressed in units of mg m<sup>2</sup> day<sup>-1</sup> over a 30-day averaging period.

Dust deposition shall be evaluated against a four-band scale as presented in Table 9.

**Table 9 – Four-band scale evaluation criteria for dust deposition**

Band number	Band description label	DUSTFALL RATE (D) (mg /m <sup>2</sup> /day <sup>1</sup> 30-day average)	Comment
1	Residential	D < 600	Permissible for residential and light commercial.
2	Industrial	600 < D < 1 200	Permissible for heavy commercial and industrial.
3	Action	1 200 < D < 2 400	Requires investigation and remediation if two sequential months lie in this band, or more than three occur in a year.
4	Alert	2 400 < D	Immediate action and remediation required following the first exceedance. Incident report to be submitted to relevant authority.

###### 4.8.3 Target, Action and Alert Thresholds are given in Table 10

**Table 10 – Target, action and alert thresholds for dust deposition**

Level	DUSTFALL RATE (D) (mg/ m <sup>2</sup> /day <sup>1</sup> 30-day average)	Averaging period	Permitted frequency of exceedances
Target	300	Annual	
Action residential	500	30 days	Three within any year, no two sequential months
Action industrial	1 200	30 days	Three within any year, no two sequential months.
Alert threshold	2 400	30 days	None. First exceedance requires remediation and compulsory report to authorities.

#### 4.8.4 Margin of Tolerance

An enterprise may submit a request to the authorities to operate within Band 3 (ACTION Band), as specified in Table 9, for a limited period, providing that this is essential in terms of the practical operation of the enterprise (for example the final removal of a tailings deposit) and provided that the best available control technology is applied for the duration.

No margin of tolerance will be granted for operations that result in dustfall rates which fall within Band 4 (ALERT Band) as specified in Table 9.

#### 4.8.5 Exceptions

Dustfalls that exceed the specified rates but that can be shown to be the result of some extreme weather or geological event shall be discounted for the purpose of enforcement and control. Such event might typically result in excessive dustfall rates across an entire metropolitan region, and not be localised to a particular operation. Natural seasonal variations, such as dry windy period during the Highveld spring will not be considered extreme events for this definition”

At present, the ambient dust levels are low and any existing dust impact is the result of:

- Occasional vehicles on unsurfaced roads in the area
- Wind generated dust on a regional level (especially during dry times)

Dust generation from this site is very low and no dust impact will occur on any surrounding land user or land use.

### 14.1.10 Noise

#### (a) Standards to be applied

##### National standards / recommendations:

SANS 0103 titled “The Measurement and Rating of Environmental Noise with regard to Land Use, Health, Annoyance and Speech.....” and its recommended levels shall apply.

Recommended limits: Assuming working hours of between 06h00 and 19h00 which classifies as daytime, a recommended maximum noise level of **45dBA** is set in terms of the table below, row b.

Type of district	Equivalent Continuous Rating Level for Noise ( $L_{AEQ,T}$ ) - (dBA)					
	Outdoors			Indoors		
	Day-night ( $L_{R,dn}$ )	Daytime ( $L_{Reg,d}$ )	Night-time ( $L_{Reg,N}$ )	Day-night ( $L_{R,dn}$ )	Daytime ( $L_{Reg,d}$ )	Night-time ( $L_{Reg,N}$ )
<b>RESIDENTIAL DISTRICTS</b>						
<b>Rural districts</b>	<b>45</b>	<b>45</b>	<b>35</b>	<b>35</b>	<b>35</b>	<b>25</b>
Suburban districts (little road traffic)	50	50	40	40	40	30
Urban districts	55	55	45	45	45	35
<b>NON-RESIDENTIAL DISTRICTS</b>						
Urban districts (some workshops, business premises, main roads)	60	60	50	50	50	40
Central business districts	65	65	55	55	55	45
Industrial districts	70	70	60	60	60	50

#### Expected community response

In terms of community response to noise, SANS recommendations are to be used as follows:

Excess dB above ambient	Estimated Community / Group Response	
	Category	Description
0	None	No observed reaction
5	Little	Sporadic complaints
10	Medium	Wide spread complaints
15	Strong	Threats of community / group action
20	Very Strong	Vigorous community / group action

In addition, the general noise industry rule of “ambient +7 dB” shall serve as a good indicator above which levels are generally “not acceptable”.

(b) Noise sources on site

The following equipment/activities generate noise. Remember that all of these activities currently take place and there have been no complaints in respect of noise (and none are anticipated):

- i) Earthmoving equipment during harvesting and loading of salt to plant and dispatch vehicles
- ii) Noise of haul trucks
- iii) General traffic generated noise

**14.1.11 Traffic**

As there will be no change in delivery traffic no traffic impact statement or impact study is relevant.

**14.1.12 Surrounding land use**

The site is extremely isolated with the closest surrounding farmstead located several kilometres from the existing sand mine. The closest public road is the unsurfaced road between the R360 north of Upington and Noenieput to the west. The R360 is the closest tar road some 3km east as the crow flies (but 7km by road).

**14.2 Description of specific environmental features and infrastructure on the site.**

Refer Figures 1-8, Paragraph 14.1 1 to 14.1.12.

**14.3 Environmental and current land use map.**

Refer figures as follows:

- Figure 1: Locality Plan
- Figure 2: Application components
- Figure 3: Regulation 2 (2) drawing
- Figure 4: Existing Site Layout Plan for the Northern Section (previously called the Industrial Salt Section)
- Figure 5: Existing Site Layout Plan for the Southern Section (previously called the Gordonia Salt Section)
- Figure 6: Surrounding Landownership
- Figure 7: Vegetation Classification (Mucina and Rutherford)
- Figure 8: CBA Data - 2016 NC CBA Mapping





**15 Impacts identified**

(Provide a list of the potential impacts identified of the activities described in the initial site layout that will be undertaken, as informed by both the typical known impacts of such activities, and as informed by the consultations with affected parties together with the significance, probability and duration of the impacts).

Note that in the Draft Scoping Report, only the potential impacts typical for such activities and those that have been shown through mining which has taken place at this site for several decades have been identified. This was and will continue to be subject to further public participation to identify additional / different impacts.

Step one is to identify applicable impacts, as per table below. Second step is to ascribe

significance and details as per table thereafter. Note that in the table below the following applies:

-  Impact occurred at establishment and is finalised
-  Establishment Phase negative impact which still occurs
-  Operational negative impact which currently takes place and will continue
-  Beneficial impact (will not be assessed further in order to reduce length of report)

Activity	Topography	Soil/ Topsoil	Visual	Land Capability	Vegetation	Surface Water	Ground Water	Animal Life	Noise	Air Quality (Dust)	Social/ Economic	Archaeology/ Cultural	Hydrocarbon	Traffic /Access
<b>1. ESTABLISHMENT ACTIVITIES (Completed and approved in terms of 2 x existing approved EMPs)</b>														
1.1. Clearing of logistical facility area outside of pan edge (Currently 2 areas i.e. at northern and southern ponds)		Orange	Orange	Orange	Orange				Yellow	Yellow		Yellow	Yellow	
1.2. Establishment of logistical facilities including residences, office, workshop, generator facility, etc.			Orange						Yellow	Yellow			Yellow	
1.3. Establishment of plant and stockpiling area on pan. (Currently 2 areas i.e. at northern and southern ponds)				Orange		Orange			Yellow	Yellow			Yellow	
1.4. Establishment of bunded fuel tanks. There are 3 tanks (main tank behind workshop and smaller tanks at generator and crusher)													Yellow	
1.5. Excavation of material from outside pan to construct pond walls - Done	Orange	Orange	Orange	Orange	Orange			Yellow	Yellow	Yellow			Yellow	
1.6. Development of dam walls for ponds on pan - Done	Orange		Orange	Orange		Orange			Yellow	Yellow			Yellow	
<b>2. OPERATIONAL PHASE ACTIVITIES (Currently occurring in terms of 2 x approved EMP)</b>														
2.1. Borehole pumping water virtually continuously from middle of pan into concentration ponds (via on surface pipes)				Red			Red							
2.2. Brine is collected concentration ponds.				Red		Red								
2.3. From these concentration ponds the brine is pumped into evaporation ponds. Evaporation ponds contain brine on the pan surface.			Red	Red										
2.4. Evaporated salt scraped off surface by scraper									Red	Red			Red	
2.5. Scraped salt loaded by front end loader to haul truck									Red	Red			Red	
2.6. Salt hauled to drying area off pan by truck									Red	Red			Red	
2.7. Salt allowed to dry in logistical facility / stockpiling area	Red													
2.8. Dried salt sent through sorting assembly. Excess brine sent to Concentration Pond.									Red				Red	
2.9. Sorted salt sent through cyclone for final moisture removal. Excess brine sent to Concentration Pond									Red				Red	
2.10. Waste Salt Handling	Red		Red											
2.11. Vehicles using unsurfaced roadways									Red	Red			Red	Red
2.12. Use of diesel													Red	



Activity	Topography	Soil/ Topsoil	Visual	Land Capability	Vegetation	Surface Water	Ground Water	Animal Life	Noise	Air Quality (Dust)	Social/ Economic	Archaeology/ Cultural	Hydrocarbon	Traffic /Access
2.13. Use of small workshop														
2.14. Potable water trucked in as required (minor volumes)														
2.15. Toilet to French Drain														
<b>3. DECOMMISSIONING PHASE ACTIVITIES</b>														
3.1. Remove final evaporated salt														
3.2. Remove / flatten all evaporation pond side walls.														
3.3. Backfill concentration pond with existing stockpiled material														
3.4. Remove all structures foundations and footings (unless required by landowner)														
3.5. Rip surface of logistical facility and stockpiling area to 30 -45cm deep														
3.6. Allow to revegetate naturally														
<b>4. AFTERCARE PERIOD</b>														
4.1. Remove alien vegetation, if present														
4.2. Monitor revegetation success and continue														
4.3. Conduct final performance assessment														
4.4. Lodge closure Application														

Note that the following table will only discuss negative impacts (those highlighted in Orange and Red).

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
<b>1. ESTABLISHMENT ACTIVITIES (Completed and approved in terms of 2 x existing EMPs)</b>								
1.1. Clearing of logistical facility area outside of pan edge	(Currently 2 areas i.e. at northern and southern ponds)	Refer Photos 3, 4 and 5						
1.1.1. Soil	Soil compacted over in manoeuvring and activity areas	±8.6ha	Life of mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.1.2. Visual	Disturbance visible	From within basin confines	Life of Mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.1.3. Land Capability	Area not available for small stock and game grazing	±8.6ha	Until revegetation	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.1.4. Vegetation / Animal Life	Area cleared of vegetation/ habitat	±8.6ha with ±900m of pan / dune interface	Until revegetation	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.2. Establishment of logistical facilities including residences, office, workshop, generator facility, etc		Refer Photos 2-5 and 11						
1.2.1. Visual	Facilities and buildings visible	From within basin confines	Life of Mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.3. Establishment of plant and stockpiling area on pan. (Currently 2 areas i.e. at northern and southern ponds)		Refer Photos 3 & 4						
1.3.1. Land Capability	Area not available to function as a pan	±11.8ha	Until rehabilitation	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.3.2. Visual	Disturbance visible	From within basin confines	Life of Mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
1.4. Establishment of banded fuel tanks. There are 3 tanks (main tank behind workshop and smaller tanks at generator and crusher)		Refer Photo 2						
1.5. Excavation of material from outside pan to construct pond walls - Done								
1.5.1. Topography	Some sand used to develop walls on pan. Concentration pond material also used to develop walls	The sand source was obtained through general levelling of off-pan activity areas. Not noticeable as an excavation anymore	Permanent	Definite	Insignificant	Yes. But will not require reversal	No	Not applicable. Has been managed.
1.5.2. Soil	Sandy material mixed with clayey pan material in construction of pond walls	All pond walls	Life of mine	Has occurred	Insignificant	Yes	No	Must be mitigated
1.5.3. Visual	Disturbance visible	From within basin confines	Life of Mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.5.4. Land Capability	Portion of pan not available to function as pan	±63.9ha	Until decommissioning rehabilitation	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.5.5. Vegetation	Described in line item 1.1.4							
1.6. Development of dam walls for ponds on pan – Done		Refer Photo 6 and 12						
1.6.1. Topography	Pond walls up to 1.5m high at most	To contain 36.3ha in ±20 evaporation ponds	Until decommissioning rehabilitation	Ongoing	Insignificant	Yes	No	Can be rehabilitated

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
1.6.2. Visual	Disturbance visible	From within basin confines	Life of Mine	Ongoing	Insignificant	Yes	No	Can be rehabilitated
1.6.3. Land Capability	Portion of pan not available to function as pan	63.9ha of which 33.0ha are ponds <sup>2</sup>	Until decommissioning rehabilitation	Ongoing	Moderate / Insignificant	Yes	No	Can be rehabilitated
1.6.4. Pan surface water	Portion of pan not available to function as pan	±63.9ha	Until decommissioning rehabilitation	Ongoing	Moderate/ Insignificant	Yes	No	Can be rehabilitated
<b>2. OPERATIONAL PHASE ACTIVITIES</b> (Currently occurring in terms of 2 x approved EMP)								
2.1. Borehole pumping water virtually continuously from middle of pan into concentration ponds (via on surface pipes) and possible establishment of additional pump sites on Portion 18 and 20 if required		Refer Photo 1						
2.1.1. Groundwater	Groundwater currently pumped from ±15 boreholes on the pan <sup>3</sup>	±1500kl per day during summer and 750kl per day during winter.	Life of mine	Definite	Assumed insignificant given the number of years it has taken place with continued recharge	Not applicable	No	Must be managed in accordance with WUL conditions

<sup>2</sup> Excludes plant and stockpiling area of 11.8ha on pan

<sup>3</sup> This is currently subject to Water Use Licence Application which will be fully reported on in upcoming draft EIA/EMP

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
2.1.2. Land Capability	Pump installations on pan surface	Minimal area. Assume 3m <sup>2</sup> per site plus electrical supply – see photo 1	Life of mine	Definite	Insignificant	Yes	No	Can be managed
2.2. Brine is collected concentration ponds.								
2.3. From these concentration ponds the brine is pumped into evaporation ponds.	Evaporation ponds contain brine on the pan surface.	Refer Photo 12						
2.3.1. Land Capability	Portion of pan not available to function as pan	Evaporation pond surface area = 33ha (in total disturbance of ±63.9ha) <sup>4</sup> .	Life of mine	Ongoing	Moderate / Insignificant	Yes	No	Must be rehabilitated
2.4. Evaporated salt scraped off surface by scraper								
2.4.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
2.4.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
2.4.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.5. Scraped salt loaded by front end loader to haul truck								

<sup>4</sup> Excluding 11.8ha on pan plant and logistical facility area

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
2.5.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
2.5.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
2.5.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.6. Salt hauled to drying area off pan by truck								
2.6.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
2.6.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
2.6.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.7. Salt allowed to dry in logistical facility / stockpiling area		Refer Photo 4 Right						
2.7.1. Topography	Stockpiles of salt	Up to 3m in height	The stockpiles are very temporary but there will be stockpiles for life of mine	Definite	Insignificant	Yes	No	Will be removed

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
2.8. Dried salt sent through sorting assembly. Excess brine sent to Concentration Pond.		Refer Photo 7						
2.8.1. Noise	Noise generated by plant	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	None feasible
2.8.2. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.9. Sorted salt sent through cyclone for final moisture removal. Excess brine sent to Concentration Pond		Refer Photo 8						
2.9.1. Noise	Noise generated by plant	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	None feasible
2.9.2. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.10. Waste Salt Handling		Refer Photo 9						
2.10.1. Land Capability	Small low stockpiles which can usually be recycled or sold as very low grade products	<1ha to 1.5m high	Until used or until decommissioning	Probably	Insignificant	Yes	No	Requires post mining rehabilitation if still in place
2.11. Vehicles using unsurfaced roadways		Refer Photo 5 & 10						

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
2.11.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
2.11.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
2.11.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place to prevent occurrence
2.11.4. Traffic	Trucks using public roads	Up to 1 truck per working hour	Life of mine	Definite	Insignificant	No	No	Must be managed: Obey road rules
2.12. Use of diesel								
2.12.1. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
2.13. Use of small workshop								
2.13.1. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
2.14. Potable water trucked in as required (minor volumes)								
2.15. Toilet to French Drain								
2.15.1. Groundwater	Possible contamination of groundwater resource in case of leak	Very local	Until biological filtering renders leak harmless	Very unlikely	Insignificant (Minor volumes)	Yes	No	Avoided
<b>3. DECOMMISSIONING PHASE ACTIVITIES</b>								
3.1. Remove final evaporated salt								



Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
3.1.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
3.1.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
3.1.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
3.2. Remove / flatten all evaporation pond side walls.								
3.2.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
3.2.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
3.2.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
3.3. Backfill concentration pond with existing stockpiled waste salt								
3.3.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
3.3.2. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
3.4. Remove all structures foundations and footings (unless required by landowner)								
3.4.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
3.4.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
3.4.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
3.5. Rip surface of logistical facility and stockpiling area to 30 -45cm deep								
3.5.1. Noise	Noise generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	No	No	Managed/ mitigated through ensuring silencers are in operation
3.5.2. Dust	Dust generated by earthmoving equipment and haul trucks	Local	Duration of activity for life of mine	Definite	Insignificant (None on surrounding land users)	If required, could take place	No	Dust could be allayed by wetting
3.5.3. Hydrocarbon	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant (if cleared)	Fully reversible	No	Hydrocarbon management plan must be put in place
3.6. Allow to revegetate naturally	Traffic generated during collection and delivery of material	Local / to Upington	Life of Mine	Definite	Insignificant (and will not change from current levels)	Yes	No	Safety
<b>4. AFTERCARE PERIOD</b>								

Activity	Nature of impact	Extent	Duration	Probability	Significance	Extent to which impact can cause or be:		
						reversed	irreplaceable loss	avoid, manage/ mitigate
4.1. Remove alien vegetation, if present	Potential Hydrocarbon leaks	Local	Until clean-up	Possible	Insignificant	Fully reversible	No	Hydrocarbon management plan must be put in place
4.2. Monitor revegetation success and continue								
4.3. Conduct final performance assessment								
4.4. Lodge closure Application								

## 16 Methodology used in determining the significance of environmental impacts

An initial table was compiled which described each activity (whether listed or not in terms of NEMA), potential impact, significance and duration. Such table was included in the draft Scoping report which was made available to all identified Interested and Affected Parties. Any relevant responses received would then have informed a revision of the site layout plan.

The impacts are rated according to nature, extent, duration, probability of occurring and significance.

a) The significance level is based on the following criteria:

<i>Significance</i>		<i>Criteria</i>
Negative	Significant (S)	<ul style="list-style-type: none"> <li>Recommended level always exceeded with associated widespread community action</li> <li>Disturbance to areas that are pristine, have conservation value, are important resource to humans and will be lost forever</li> <li>Complete loss of land capability</li> <li>Destruction of rare or endangered specimens</li> <li>May affect the viability of the project</li> </ul>
	Moderate (M)	<ul style="list-style-type: none"> <li>Moderate measurable deterioration and discomfort</li> <li>Recommended level occasionally violated – still widespread complaints</li> <li>Partial loss of land capability</li> <li>Complete change in species variety or prevalence</li> <li>May be managed</li> <li>Is insignificant if managed according to EMP provisions</li> </ul>
	Minor/ (I) Insignificant	<ul style="list-style-type: none"> <li>Minor deterioration. Change not measurable</li> <li>Recommended level will rarely if ever be violated</li> <li>Sporadic community complaints</li> <li>Minor deterioration in land capability</li> <li>Minor changes in species variety or prevalence</li> </ul>
	Negligible	<ul style="list-style-type: none"> <li>An impact will occur but it is barely discernible and not worthy of further investigation</li> </ul>
Positive	Minor	<ul style="list-style-type: none"> <li>Improvements in local socio-economics</li> </ul>
	Significant	<ul style="list-style-type: none"> <li>Major improvements in local socio-economics with some regional benefits</li> </ul>

b) The **duration** is classified as:

- Permanent (post-closure)
- Life of Mine (LOM)
- Temporary

c) The **probability** is ranked as:

- Definite/Certain
- Possible
- Unlikely

## 17 The positive and negative impacts that the proposed activity and alternatives will have on the environment and the community that may be affected.

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

The existing and proposed future mining has the following **negative impacts** (in no particular order) on the environment and community:

### Groundwater Regime:

Any impact on surrounding users of groundwater must be avoided. Fortunately there are no boreholes within the confines of the Grootwitpan basin. In the normal course of events, excessive abstraction would cause drawdown and “downstream” impacts on quantity (and possibly quality).

It is most likely that a full groundwater study will be required as part of the WUL application currently underway but it can be stated that the impact of continued groundwater abstraction from the pan confines is insignificant given:

- Over 30 years of abstraction which has already taken place of this renewable resource
- The pumping only takes place to depths of 20-30m and only impacts on a pan based “perched” water table and not a regional aquifer which would be at a much deeper level
- The absence of boreholes surrounding the site
- The very poor quality of the water precluding any use as drinking, stock watering or cultivation.

### Impact on Vegetation / Off-Pan Biodiversity and Land Capability:

Any impact which would have occurred on vegetation has already occurred. Such impact is the disturbance of 8.6ha for logistical facilities and accommodation on the sandy banks/ slopes above the pan. This development has also led to the “unavailability” of approximately 1km of pan/ dune hinterland interface. This impact has however been quantified as insignificant given:

- The pan circumference is over 16km in length
- The activities do not result in the disturbance of any corridor and movement for fauna is not restricted except in the case of perhaps the 1km length disturbed by the logistical facilities
- The 8.6ha lost to wilderness is absolutely negligible in the scale of the surrounding duneveld

### Impact on pan functioning and On-Pan Land Capability

The fact is that Grootwitpan’s functioning as a pan has not been negatively impacted by the activities which have taken place. The total on pan disturbance as a result of this operation is in the order of 75ha out of over 1 000ha pan surface.

### Topography:

There has been insignificant impact on topography due to:

- Removal of sand for development of pond walls
- Digging of concentration ponds
- Development of low pond walls on the flat dam surface

- Location of temporary salt stockpiles

Noise and dust:

Very limited impact and will not impact on any surrounding land use or user

Possible Visual Impact:

It is likely that visual impact of the operation would take place to any persons within the confines of the Grootwitpan basin, but the important point is that the basin sees very little traffic and is very rarely accessed.

Hydrocarbon Impact

The potential exists for impact from Hydrocarbon pollution and measures are in place to avoid such impact as well as interventions required should such hydrocarbon leak ever take place.

The only **positive impact** is the socio economic impact which accrues through employment opportunities (direct and indirect), availability of salt and income to the mining company and landowner.

## 18 The possible mitigation measures that could be applied and the level of risk.

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

**This table has been compiled in the pre-scoping phase.**

Impact	Possible Mitigation	Level of risk
<b>Topography:</b> Off Pan impact	Shape remaining / residual edges to mimic natural contours so that no slope exceeds 1:3	None.
<b>Topography:</b> On Pan impact: Objective to leave pan surface flat as per pre-mining condition	Backfill concentration ponds with excess/ waste salt. Spread evaporation pond walls and allow natural processes to level the pan.  If removed from pan then such removed material will require burial in sands and cover with sandy material.	Post Mining Risk: Low, if spread.  Post Mining Risk: High - if material is removed from pan surface and buried then such cover material will always be subject to wind erosion and exposure of the very salty buried material.
<b>Groundwater:</b>	Adhere to prescriptions of the Water Use Licence when obtained	Risk is low as demonstrated by the past several decades of mining which has already taken place at this site.

Impact	Possible Mitigation	Level of risk
<b>Topsoil / Soil:</b> No topsoil was removed and stockpiled prior to logistical facility area development	After removal of all facilities, the compacted sand must scarified and allowed to revegetate naturally	Risk is very low given that there is very little to differentiate the orthic A horizon (upper sand layer deplete of nutrients) and the lower lying sands in the normal course of events. These are in any event often mixed during droughts when mixing will occur through shifting sand dunes
Land Capability	Return the site to serve as pan/wilderness / grazing function after full rehabilitation of the site.	Level of risk: Low Linked to low risk in respect of soil as described above and rehabilitation and removal of all activities and facilities post mining
Vegetation / Animal Life	<p>Don't allow unnecessary access into surrounding veld</p> <p>No planting will be necessary post mining</p> <p>No poaching or trapping of animals is permitted. Ensure staff report any snare or poaching noted.</p> <p>Alien / exotic plant management must take place (except in the case of the <i>Salsola</i>)</p>	Level of risk: Low
Dust impact from the operation	<p>Can be controlled with use of water or other dust allaying agents, but will probably not be required.</p> <p>Limit speed on internal roads as well as access roads to the site</p> <p>If dust result in any complaints from surrounding parties (highly unlikely), then a dust monitoring programme must be established and best options installed to eliminate any future dust from that source.</p>	Minimal risk given isolation of site. Must be controlled in terms of employee health regulations
Noise	<p>The impacts of noise must limited more because of employee health reasons than for any impact on surrounding land users or land use</p> <p>All vehicles must be equipped with working silencers</p>	Minimal risk given isolation of site. Must be controlled in terms of employee health regulations
Waste / Hydrocarbon impact	<p>Any transfer of fuel must take place using suitable funnels and pumping equipment</p> <p>Staff to be trained in respect of hydrocarbon pollution and contamination clearing methodologies to be employed</p> <p>Any regular servicing of plant and equipment to take place at the workshop or at head office site</p>	Risk is low given small scale of the activities.

Impact	Possible Mitigation	Level of risk
	Separate waste streams and handle accordingly	
Heritage Impact	None required. No further disturbance of any virgin areas is anticipated	None

## 19 The outcome of the site selection Matrix. Final Site Layout Plan

(Provide a final site layout plan as informed by the process of consultation with interested and affected parties)

Existing Mine Layout Plan is as contained in Figures 4 and 5. Still subject to further public participation.

## 20 Motivation where no alternative sites were considered.

This is an existing, profitable operation with insignificant impact. The selection of any alternative site, would generate additional new impacts and would be illogical.

## 21 Statement motivating the preferred site.

(Provide a statement motivation the final site layout that is proposed)

The continued use of this site has been informed by the following factors:

- The presence of salty brine in the groundwater allowing for the continued salt production. Remember that not all pans have the ability to provide brine of sufficient quality (if any at all).
- It is an existing site and all logistical and other facilities are in place.
- The environmental impacts are known to be insignificant.
- Surrounding land uses and users do not preclude the use of the site for salt mining

## 22 Plan of study for the Environmental Impact Assessment process

### 22.1 Description of alternatives to be considered (including no go option).

The following alternatives must be considered during the EIA process:

Alternatives in respect of:	Contained in draft Scoping report	Update in Final Scoping report
Property on which or location where it is proposed to undertake the activity	Yes. Refer Para 12.1	No change required as a result of Public Participation
Type of activity to be undertaken	Yes. Refer Para 12.2	No change required as a result of Public Participation
Design or layout of the activity	Yes. Refer Para 12.3	No change required as a result of Public Participation
Technology to be used in the activity	Yes. Refer Para 12.4	No change required as a result of Public Participation
Operational aspects of the activity	Yes. Refer Para 12.5	No change required as a result of Public Participation



Alternatives in respect of:	Contained in draft Scoping report	Update in Final Scoping report
Option of not implementing the activity	Yes. Refer Para 12.6	No change required as a result of Public Participation

## 22.2 Description of the aspects to be assessed as part of the environmental impact assessment process

The following activities and environmental aspects thereof will continue to be assessed during the EIA:

Activity	Was it provisionally assessed in the Draft Scoping Report	Status in the Final Scoping report
<b>1. ESTABLISHMENT ACTIVITIES</b>		
1.1. Clearing of logistical facility area outside of pan edge		
1.1.1. Soil	Yes. Refer Part 15.	Refer Part 15. No change required
1.1.2. Visual	Yes. Refer Part 15.	Refer Part 15. No change required
1.1.3. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
1.1.4. Vegetation / Animal Life	Yes. Refer Part 15.	Refer Part 15. No change required
1.2. Establishment of logistical facilities including residences, office, workshop, generator facility, etc		
1.2.1. Visual	Yes. Refer Part 15.	Refer Part 15. No change required
1.3. Establishment of plant and stockpiling area on pan. (Currently 2 areas i.e. at northern and southern ponds)		
1.3.1. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
1.3.2. Visual	Yes. Refer Part 15.	Refer Part 15. No change required
1.4. Establishment of banded fuel tanks. There are 3 tanks (main tank behind workshop and smaller tanks at generator and crusher)		
1.5. Excavation of material from outside pan to construct pond walls - Done		
1.5.1. Topography	Yes. Refer Part 15.	Refer Part 15. No change required
1.5.2. Soil	Yes. Refer Part 15.	Refer Part 15. No change required
1.5.3. Visual	Yes. Refer Part 15.	Refer Part 15. No change required
1.5.4. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
1.5.5. Vegetation	Yes. Refer Part 15.	Refer Part 15. No change required
1.6. Development of dam walls for ponds on pan – Done		
1.6.1. Topography	Yes. Refer Part 15.	Refer Part 15. No change required
1.6.2. Visual	Yes. Refer Part 15.	Refer Part 15. No change required
1.6.3. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
1.6.4. Pan surface water	Yes. Refer Part 15.	Refer Part 15. No change required
<b>2. OPERATIONAL PHASE ACTIVITIES</b>	Yes. Refer Part 15.	Refer Part 15. No change required
2.1. Borehole pumping water virtually continuously from middle of pan into concentration ponds (via on surface pipes)		
2.1.1. Groundwater	Yes. Refer Part 15. Subject to WUL conditions	Refer Part 15. Still subject to future WULA conditions.
2.1.2. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
2.2. Brine is collected concentration ponds.		

Activity	Was it provisionally assessed in the Draft Scoping Report	Status in the Final Scoping report
2.3. From these concentration ponds the brine is pumped into evaporation ponds.		
2.3.1. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
2.4. Evaporated salt scraped off surface by scraper		
2.4.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.4.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
2.4.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.5. Scraped salt loaded by front end loader to haul truck		
2.5.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.5.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
2.5.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.6. Salt hauled to drying area off pan by truck		
2.6.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.6.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
2.6.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.7. Salt allowed to dry in logistical facility / stockpiling area		
2.7.1. Topography	Yes. Refer Part 15.	Refer Part 15. No change required
2.8. Dried salt sent through sorting assembly. Excess brine sent to Concentration Pond.		
2.8.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.8.2. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.9. Sorted salt sent through cyclone for final moisture removal. Excess brine sent to Concentration Pond		
2.9.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.9.2. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.10. Waste Salt Handling		
2.10.1. Land Capability	Yes. Refer Part 15.	Refer Part 15. No change required
2.11. Vehicles using unsurfaced roadways		
2.11.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
2.11.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
2.11.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.11.4. Traffic	Yes. Refer Part 15.	Refer Part 15. No change required
2.12. Use of diesel		
2.12.1. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.13. Use of small workshop		
2.13.1. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
2.14. Potable water trucked in as required (minor volumes)		
2.15. Toilet to French Drain		
2.15.1. Groundwater	Yes. Refer Part 15.	Refer Part 15. No change required
<b>3. DECOMMISSIONING PHASE ACTIVITIES</b>		
3.1. Remove final evaporated salt		
3.1.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
3.1.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
3.1.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
3.2. Remove / flatten all evaporation pond side walls.		
3.2.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
3.2.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
3.2.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required

Activity	Was it provisionally assessed in the Draft Scoping Report	Status in the Final Scoping report
3.3. Backfill concentration pond with existing stockpiled waste salt		
3.3.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
3.3.2. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
3.4. Remove all structures foundations and footings (unless required by landowner)		
3.4.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
3.4.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
3.4.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
3.5. Rip surface of logistical facility and stockpiling area to 30 -45cm deep		
3.5.1. Noise	Yes. Refer Part 15.	Refer Part 15. No change required
3.5.2. Dust	Yes. Refer Part 15.	Refer Part 15. No change required
3.5.3. Hydrocarbon	Yes. Refer Part 15.	Refer Part 15. No change required
3.6. Allow to revegetate naturally		
<b>4. AFTERCARE PERIOD</b>		
4.1. Remove alien vegetation, if present		
4.2. Monitor revegetation success and continue		
4.3. Conduct final performance assessment		
4.4. Lodge closure Application		

### 22.3 Description of aspects to be assessed by specialists

No specialist studies are anticipated as part of this application, however it will no doubt be a requirement of the Water Use Licence Application process that a groundwater study is required. If such study is required, then it will also be appended to this application.

Note also that no response yet from SAHRA, but based on past experience, they will no doubt require Heritage Impact Assessment despite the lack of further disturbance. Such study will form part of draft EIA/EMP and DMR will be notified as soon as specialist study has been received (if required by SAHRA).

Specialist field of study	Tasks to be undertaken/ Aspects covered in study	Has it been included in Final Scoping report / Status as at Final Scoping report
None required		

### 22.4 Proposed method of assessing the environmental aspects including the proposed method of assessing alternatives

In the draft Scoping report, the environmental aspects were assessed based on the experience of the report compiler (Refer CV in Appendix 1). This was further assessed and refined in the following ways:

- Consultation with / Call for comments from all Interested and Affected Parties (I&AP's)
- Call for specialist studies to include assessment on specific environmental elements if deemed a requirement of the Scoping process.

The results of such further assessments will be included in the future EIA/EMP.

## **22.5 The proposed method of assessing duration and significance**

As for Para 22.4.

## **22.6 The stages at which the competent authority will be consulted**

The draft Scoping report was submitted to relevant State Departments. The final Scoping report (this report) will be submitted to the competent authority and such report will contain the details and results of the initial public participation. Consultation continues and all comments will be forwarded to the DMR and included in future EIA/EMP

The competent authority will decide on the implementation of the Plan of Study. If the applicant is given the go ahead to continue, then the EIA and EMP will be subject to public participation and finally lodged to the competent authority.

## **22.7 Particulars of the public participation process with regard to the Impact Assessment process that will be conducted**

### **22.7.1 Steps to be taken to notify interested and affected parties**

Notification of I&AP's has taken place in a system relative to their expected input as follows:

- 1) Landowner: The landowner is the applicant
- 2) Surrounding adjacent landowners: Through telephone call, email and /or registered post
- 3) General public and residents of the area: Through advert in local press
- 4) Notice placed at entrance of mine & Upington library notice board
- 5) In addition, the relevant Govt. Departments will be contacted by telephone and Email in respect of the proposed project

Note that all parties will have full access to the Scoping report and EIA/EMP (in final or draft form depending on timing of consultation).

### **22.7.2 Details of the engagement process to be followed.**

All parties (except landowner and State Departments) will have to register their interest in the matter. Land owner and State Departments will be deemed to be registered I&AP's.

All registered I&AP's will be kept abreast of the application and will be supplied with all relevant documentation as well as consultations (one on one), if they so wish.

All commenting periods will be minimum 30 days as per NEMA regulations.

### **22.7.3 Description of the information to be provided to Interested and Affected Parties.**

The information presented will depend on timing. Initially, the draft Scoping report served as the basis for comment. The next round of public participation will use the draft EIA/EMP as the information provided for further consultation.

## 22.8 Description of the tasks that will be undertaken during the environmental impact assessment process.

The following tasks will need to be undertaken during the EIA process:

- Public participation will proceed as a transparent as an all-inclusive as possible.
- All registered I&AP's will be kept informed and provided several opportunities to comment.
- Draft EIA / EMP will be compiled as basis for further consultation
- No Specialist studies will be completed at this stage (this may change as a result of public participation)

## 22.9 Measures to avoid, reverse, mitigate, or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

Activity	Mitigation Type (modify, remedy, control, or stop)Through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc.).	Potential for Residual Risk
<b>1. ESTABLISHMENT ACTIVITIES</b>		
1.1. Clearing of logistical facility area outside of pan edge		
1.1.1. Soil	Remedy through post-mining rehabilitation	Minor
1.1.2. Visual	Remedy through post-mining rehabilitation	Minor
1.1.3. Land Capability	Remedy through post-mining rehabilitation	Minor
1.1.4. Vegetation / Animal Life	Remedy through post-mining rehabilitation	Minor
1.2. Establishment of logistical facilities including residences, office, workshop, generator facility, etc		
1.2.1. Visual	Remedy through post mining removal	None
1.3. Establishment of plant and stockpiling area on pan. (Currently 2 areas i.e. at northern and southern ponds)		
1.3.1. Land Capability	Remedy through post-mining rehabilitation	Minor / Moderate
1.3.2. Visual	Remedy through post-mining rehabilitation	Minor
1.4. Establishment of bunded fuel tanks. There are 3 tanks (main tank behind workshop and smaller tanks at generator and crusher)		
1.5. Excavation of material from outside pan to construct pond walls - Done		
1.5.1. Topography	Remedy through post mining removal	None
1.5.2. Soil	Remedy through post-mining rehabilitation	Minor
1.5.3. Visual	Remedy through post mining removal	None

Activity	Mitigation Type (modify, remedy, control, or stop)Through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc.).	Potential for Residual Risk
1.5.4. Land Capability	Remedy through post-mining rehabilitation	Minor
1.5.5. Vegetation	Remedy through post-mining rehabilitation	Minor
<b>1.6. Development of dam walls for ponds on pan – Done</b>		
1.6.1. Topography	Remedy through post mining removal	None
1.6.2. Visual	Remedy through post-mining rehabilitation	Minor
1.6.3. Land Capability	Remedy through post mining removal	Minor
1.6.4. Pan surface water	Remedy through post-mining rehabilitation	Minor
<b>2. OPERATIONAL PHASE ACTIVITIES</b>		
<b>2.1. Borehole pumping water virtually continuously from middle of pan into concentration ponds (via on surface pipes)</b>		
2.1.1. Groundwater	Stop	None
2.1.2. Land Capability	Remove pumps and electrical connections post mining	None
<b>2.2. Brine is collected concentration ponds.</b>		
<b>2.3. From these concentration ponds the brine is pumped into evaporation ponds.</b>		
2.3.1. Land Capability	Remedy through post-mining rehabilitation	Minor
<b>2.4. Evaporated salt scraped off surface by scraper</b>		
2.4.1. Noise	Control through noise control (if feasible)	None
2.4.2. Dust	Control through dust control if required	None
2.4.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>2.5. Scraped salt loaded by front end loader to haul truck</b>		
2.5.1. Noise	Control through noise control (if feasible)	None
2.5.2. Dust	Control through dust control if required	None
2.5.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>2.6. Salt hauled to drying area off pan by truck</b>		
2.6.1. Noise	Control through noise control (if feasible)	None
2.6.2. Dust	Control through dust control if required	None

Activity	Mitigation Type (modify, remedy, control, or stop)Through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc.).	Potential for Residual Risk
2.6.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.7. Salt allowed to dry in logistical facility / stockpiling area		
2.7.1. Topography	Stop	None
2.8. Dried salt sent through sorting assembly. Excess brine sent to Concentration Pond.		
2.8.1. Noise	Control through noise control (if feasible)	None
2.8.2. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.9. Sorted salt sent through cyclone for final moisture removal. Excess brine sent to Concentration Pond		
2.9.1. Noise	Control through noise control (if feasible)	None
2.9.2. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.10. Waste Salt Handling		
2.10.1. Land Capability	Remove	None
2.11. Vehicles using unsurfaced roadways		
2.11.1. Noise	Control through noise control (if feasible)	None
2.11.2. Dust	Control through dust control if required	None
2.11.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.11.4. Traffic	None required	None
2.12. Use of diesel		
2.12.1. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.13. Use of small workshop		
2.13.1. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
2.14. Potable water trucked in as required (minor volumes)		
2.15. Toilet to French Drain		
2.15.1. Groundwater	Stop	None
<b>3. DECOMMISSIONING PHASE ACTIVITIES</b>		
3.1. Remove final evaporated salt		
3.1.1. Noise	Control through noise control (if feasible)	None

Activity	Mitigation Type (modify, remedy, control, or stop)Through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc.).	Potential for Residual Risk
3.1.2. Dust	Control through dust control if required	None
3.1.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>3.2. Remove / flatten all evaporation pond side walls.</b>		
3.2.1. Noise	Control through noise control (if feasible)	None
3.2.2. Dust	Control through dust control if required	None
3.2.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>3.3. Backfill concentration pond with existing stockpiled waste salt</b>		
3.3.1. Noise	Control through noise control (if feasible)	None
3.3.2. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>3.4. Remove all structures foundations and footings (unless required by landowner)</b>		
3.4.1. Noise	Control through noise control (if feasible)	None
3.4.2. Dust	Control through dust control if required	None
3.4.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>3.5. Rip surface of logistical facility and stockpiling area to 30 -45cm deep</b>		
3.5.1. Noise	Control through noise control (if feasible)	None
3.5.2. Dust	Control through dust control if required	None
3.5.3. Hydrocarbon	Control and remedy through Hydrocarbon management protocol.	Although <i>unlikely</i> , there is a <i>minor residual risk</i> if leak is not remedied.
<b>3.6. Allow to revegetate naturally</b>		
<b>4. AFTERCARE PERIOD</b>		
<b>4.1. Remove alien vegetation, if present</b>		
<b>4.2. Monitor revegetation success and continue</b>		
<b>4.3. Conduct final performance assessment</b>		
<b>4.4. Lodge closure Application</b>		



## **23 Other Information required by the competent Authority**

### **23.1 Compliance with the provisions of sections 24(4)(a) & (b) read with section 24(3) (a) and (7) of the National Environmental Management Act (Act 107 of 1998). The EIA report must include the:-**

#### **23.1.1 Impact on the socio-economic conditions of any directly affected person.**

Socio-economic impact occurs as a result of the following parties' socio-economic status being altered:

- Landowner: Positive impact in respect of surface rental and / or other income as a result of the salt harvesting.
- Mining Company and employees: Guaranteed income for duration of the project.
- Consumer: Guaranteed supply of salt at competitive prices
- The applicant company is bound by prescriptions of the Social and Labour Plan to contribute to the community's skills development and must also implement a Local Economic Development project which meets the satisfaction of the DMR and local authority.
- The social and labour plan also prescribes skills development for staff and community members.

#### **23.1.2 Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act.**

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

No expansion above and beyond that currently on site is planned to occur. However, this scoping report will be lodged with SAHRIS for their comment.

Note that a nearby pan (on Gemsbok Horn) was subject to a full AIA and PIA. The studies did not locate any artefacts of any significance and it is unlikely that this site will yield any artefacts at all given the disturbance which has taken place to date. No further expansion of activities is planned.

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

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

Not applicable – refer Site Layout Plan as indicated in Figures 4 & 5.

## 25 UNDERTAKING REGARDING CORRECTNESS OF INFORMATION

I, **CRAIG DONALD** herewith undertake that the information provided in the foregoing report is correct, and that the comments and inputs from stakeholders and Interested and Affected parties has been correctly recorded in the report.



**Signature of the EAP**

**DATE: 24 August 2020**

## 26 UNDERTAKING REGARDING LEVEL OF AGREEMENT

I, **CRAIG DONALD** herewith undertake that the information provided in the foregoing report is correct, and that the level of agreement with interested and Affected Parties and stakeholders has been correctly recorded and reported herein.



**Signature of the EAP**

**DATE: 24 August 2020**

## **Appendix 1:**

### **CV and Experience of EAP**



## CV and Relevant Experience

**Name:** CRAIG DONALD  
**Date of Birth:** 26 February 1967  
**Parent Firm:** Site Plan Consulting  
**Position in Firm:** Member (50%)  
**Years with the Firm:** Since 2004 as member  
**Nationality:** South African

### Qualifications:

Year	Qualification	Institution
1984	Senior Certificate Matriculation	Plumstead High School
1992	National Higher Diploma: Town & Regional Planning ( <i>cum Laude</i> )	Cape Technikon
1995	Minerals and Metals Extraction short course	Continuing Engineering Education, University of Witwatersrand
1997	National Diploma: Surface Mine Management	Technikon SA
1999	Principles for Environmental Management short course	Environmental Evaluation Unit of University of Cape Town
2003	Masters of Business Administration	University of Cape Town

**Languages :** English (first language)  
 Afrikaans (second language)

### Employment History & Key Qualifications:

1989 -2004: Settlement Planning Services  
 2004 till present: Site Plan Consulting CC (as 50% member)

I was initially employed by Settlement Planning Services (a Town Planning Consultancy) as a technician during my Higher Diploma in Town and Regional Planning as part of my experiential training. Under the mentorship of Stephen van der Westhuizen my main involvement was the compilation of environmental management programmes (mainly in surface mining related field) and geographic information systems. There was little guidance and no templates for the compilation of the EMPs and between Mr van der Westhuizen and myself we developed a document structure acceptable to the then Department of Minerals.

In order to obtain a deeper understanding of the relevant issues, I completed a Surface Mine Management course as well as short courses such as Mineral and Metal Extraction and the immersive Environmental Evaluation course run by the EEU of UCT. I completed a part-time MBA at UCT in 2003.

In 2004 I joined Mr van der Westhuizen's Site Plan Consulting CC as a 50% member and since then have been serving mostly the Surface Mining industry in all environmental related matters as well other aspects in their licencing and legislated environmental requirements in maintaining said approvals (if granted).

### Main tasks:

I have many years practical experience in diverse environmental, spatial and mine planning projects. In that time I have developed experience in use of Word, Excel, CorelDraw and ArcView GIS.

The main focus of work experience has been in the licencing, physical and environmental planning, monitoring and closure of surface mining operations. The mines have varied in:

- Size from small sand mines to the largest aggregate or diamond producers,
- Products from clay to diamonds,
- Location from the Alexander Bay to East London/KZN coastal areas as well as inland in Free State and Limpopo
- Scale and type of environmental impact.

In respect of the licencing and physical planning of surface mines, the work entails *inter alia* the compilation of:

- Mining and Prospecting Work Programmes: a detailed mine / prospect plan and project description including cash flow forecast / budget to determine mine's economic viability and cost of prospecting
- Social and Labour Plan: Legislated document required to describe how the mine will maximise its socio-economic impact through enforced education, training and corporate social responsibility programmes for the staff and surrounding community.

In respect of the environmental planning, the work has entailed the completion of Environmental Authorisation Application forms and the compilation of Basic Assessments, Scoping Reports, Environmental Impact Assessments, Environmental Management Plans and Programmes dependent on application requirements in accordance with either or both the Mineral and Petroleum Resources Development Act and the National Environmental Management Act (with the amalgamation of these 2 pieces of legislation in December 2014). These have all entailed full public participation and liaison with and full input from specialists as required.

In respect of monitoring the work involves conducting of environmental audits to measure the level of compliance of actual site conditions against the prescriptions of the EMP. The auditing task also served to highlight any shortcomings in the EMP.

Closure of surface mining operations has entailed the conducting of all public participation and the lodging of all documentation required.

In addition, the work also entails annual updates of Rehabilitation Quantum calculations for almost all of the approved Mining Rights in the list below. These calculations are conducted using both the Guideline of the DMR and as Itemised costs in certain relevant operations. In addition to the list below, we have been calculated the rehabilitation quantum for Alexkor and De Beers (now Transhex) operations on the West Coast as well as Lower Orange River operations of Transhex (now LOR-D/Plateaux Diamonds).

The following lists represent the projects wherein I have been the lead EAP. I have been involved in other projects as an assistant to the lead EAP. Note that although I (and Site Plan Consulting) have always adhered to the principles of NEMA in the EIA process, the amalgamation of the Minerals and Petroleum Resources Development Act and National Environmental Management Act as the "One Environmental System" only came into effect in December 2014. The projects I have conducted under that system have been listed separately under the relevant project experience which follows.

#### **Relevant Project Experience:**

##### Prospecting Rights (including public participation and compilation of EMPlans (inclusive of EIAs)):

- For Salt on Papendorp Pan as community initiative supported by Cawood Salt (Pty) Ltd
- EMPs only for 7 Heavy Mineral Prospects of the West Coast (Basileus Group)
- Firlands (Gordons Bay) for aggregate - Afrimat
- Zoet and Zuur Diamond pipe (Boshof, Free State)
- Several Alluvial Diamond prospects on West Coast and inland West Coast (Western and Northern Cape) – Surfzone (Pty) Ltd, et al.
- Phosphate prospect (Saldanha) –Gecko Fert (Pty) Ltd
- Aggregate prospect near Oyster Bay in Eastern Cape – Denron Group
- Cobalt, Copper, Molybdenum, Nickel, Lead, Zinc, Silver, Gold & Platinum Group Minerals on 13 farms in the Kenhardt Magisterial District – Lehumo Resources (Pty) Ltd
- Nickel and related minerals on 8 farms near Kliprand – Hondekloof Nickel (Pty) Ltd
- Kaolin at Langklip (near Saldanha) – Seeland Development Trust on behalf of local community.
- Base minerals around Oena Mine in Northern Cape – African Star Resources (Pty) Ltd
- 6 sites for Uranium in the Karoo (Tasmin Pacific Minerals Ltd)
- Nickel prospect at Oup near Pofadder – Lehumo Resources (Pty) Ltd
- Commissioners Pan Salt Prospect – Dwaggas Soutwerke (Pty) Ltd
- Gypsum prospects near Kimberley, Vanrhysdorp and in the Bushmanland (St Gobain Group)
- Sand sources for Atlantis Foundries (Western Cape) – ZLLD Sand Mining (Pty) Ltd
- Salt at Gemsbok Horn (North of Upington) – Transalt (Pty) Ltd

Mining Permits and Rights (including full Public Participation and compilation of EMPs inclusive of EIAs)

- Caledon Manganese Mining Permit – Rand Gold Reclamation (Pty) Ltd
- Pentlands Granite Quarry Mining Right near Empangeni (KZN) – Masa Mzantsi Cement (Pty) Ltd
- Gamohaam Aggregate Quarry near Kuruman (Permit) – Afrimat Group
- Cawood Salt Mine at Sout River mouth (Amendment of existing Right) – Cawood Salt (Pty) Ltd
- Kuipersbult Aggregate Mining Right near Lephalale (Limpopo) as source for Medupi Power station construction – Afrimat Group
- Dikpens Gypsum Mine Extension (Bushmanland) – St Gobain Group
- Yzerfontein Pan Gypsum mine - Amendment of Mining Right including update of EMP – St Gobain Group
- Gypsum Mine near Vanrhynsdorp - Mining Right – PPC (Right now owned by St Gobain Group)
- Transand Aggregate mine near Hartenbos - Mining Right – Transand (Pty) Ltd
- Aggregate and sand mine on municipal owned land in Gansbaai (Permit and Right)- Sisiza Ukhanyo Trading 410 (Pty) Ltd
- Sand mining permit near Salmonsdam Nature Reserve, Stanford – DJ Transport (Pty) Ltd
- Limestone Mining Right north of Klaver – Now held by Afrimat (previously Cape Lime (Pty) Ltd
- Sand Mining permits near Gouritz River / Vlees Bay – Transand Group
- Phosphate Mining Right near Langebaanweg - Gecko Fert (Pty) Ltd
- Oyster Bay Mining Right application for Aggregate – Denron Group
- Moddergat Sand Mining Right (between Worcester and Villiersdorp) – Afrimat Group
- Mining Right for Manganese near Swellendam – Aquarella (Pty) Ltd
- Involvement to a greater or lesser degree in at least 50 other Mining Permit and Mining Right applications
- EMP updates / amendments (some of which did not require public participation) for several operations (at least 20).

Environmental Performance /Audit Assessments (monitoring) of the following sites on one off or regular basis. First compiled in terms of Reg 55 of MPRDA prescriptions and since December 2014 guided by NEMA requirements (Appendix 5 and Regulation 34 of NEMA):

- Crammix Clay Mine (Brakenfel)
- Botriver Sand mine (Steyns)
- Cawood Salt Mine (Sout River)
- Swellendam Manganese Mine
- Buffelsbank Diamond Mine
- Gecko Fert Phosphate Prospects
- Cape Lime Limestone Mine near Vredendal
- Denron operations (Sand and Aggregate) Knysna / Plettenberg Bay area
- Dimension Stone Mines of Verde Bitterfontein (Namaqualand)
- Limestone quarries in Bredasdorp and Vredendal
- Lime Sand near Saldanha – Marine Lime
- Cawood Salt Mine on West Coast
- 3 x Salt Mines north of Upington
- PPC Gypsum Mine near Vanrhynsdorp
- Lafarge Western Cape operations including Tygerberg, Dorstberg, Peak and Saldanha Quarries
- Maskam Gypsum Mine near Vanrhynsdorp
- Nama Copper: Retreatment of existing dumps at Nababeep
- Various Afrimat aggregate operations throughout the country
- Setting up of Environmental Monitoring Committee at Yzerfontein Gypsum Mine
- Setting up of Environmental Monitoring Committee at George K1 Quarry
- Johnsons Brick Clay Mine (Oudtshoorn)

Closure Applications (for mining and prospecting operations):

- Gecko Fert Phosphate Prospecting Rights and Mining Permit
- Knysna Whitebridge Quarry
- Denron Funda and Helderwater Quarry – Plettenberg Bay
- Crammix Clay Mine (Brackenfel)

- Vaale Valley Sand Mine (Mossel Bay)
- Various Dimension Stone bulk samples for Verde Bitterfontein (Namaqualand)
- Bergsig / Farm 292 Closure (Hartenbos)
- Klipfontein Sand Mine (Vlees Bay)
- Welbedagt Gravel Permit (Herbertsdale / Mossel Bay)

“One Environmental System” applications (Post 8 December 2014) all conducted in terms of NEMA EIA process:

- Cape Lime Sand Mine (Schaap Kraal operation) – Afrimat
- Atlantis Foundries Sand Mine Ptn 8 – ZLLD Sand Mining (Pty) Ltd
- Atlantis Foundries Sand Mine Prospect (Ptn 4 & 5) – ZLLD Sand Mining (Pty) Ltd
- De Hoek Sand Mining Right – Buy-Line Trading (Pty) Ltd
- Denver Quarry Section 102 (MPRDA)– Afrimat
- Desert Rose Dimension Stone Mine – Application only
- Naroogna Pan Salt Mine – United Salt (Pty) Ltd
- Stanford Quarry Extension – Afrimat
- Bester Calcrete Mining Permit – West Coast Calcrete
- Commissioner Pan Salt Mine – Dwaggas Salt Works (Pty) Ltd
- Lezmin Sand Mine (Gouritz Area) – Lezmin 2021 CC
- Yzerfontein Gypsum Mine (Section 102) – St Gobain Construction Materials (SA)
- Skietkuil Quarry Mining Permit – Skietkuil Quarries CC
- Honingklip Gravel Mining Permit – Western Cape Construction Materials (Pty) Ltd
- Johnsons Clay Brick Oudtshoorn (Mining Right Amendment)
- Okiep Dumps Reprocessing Application – O’okiep Copper Company Ltd
- Karoo One / Bo Plaas Sand and Gravel Mining Permit
- Salt Prospect – Gemsbok Hoorn (N Cape) – Transalt (Pty) Ltd
- Bosluispan Diamond Mine (Section 102 Application) – Kori Diamonds (Pty) Ltd
- Oena Diamond Mine (Section 102 Application) – African Star Minerals
- Welbedagt East Gravel – Mossel Bay - Buyline Trading
- Gemsbok Horn Salt Prospect – Upington – Industrial Salt
- Okiep Tailings Investigation – OCC – Okiep and Carolusberg
- Regulation 31 Application: Kliprug Quarry for Batch Plant - Afrimat
- Kolkies River Gypsum Mine – Ceres- Space Minerals – not yet lodged

Section 24G Applications:

- Makulu Quarry – Denron
- Swellendam Manganese Mine – Sikhova Environmentally Friendly Building Solutions
- Illegal Waste Disposal Site – Die Kop – Plettenberg Bay
- Smalblaar Quarry – Stockpiling area - Afrimat



**Appendix 2:**

**Declaration of Independence of EAP**



**DECLARATION OF THE EAP**

I, CRAIG DONALD declare that —

General declaration:

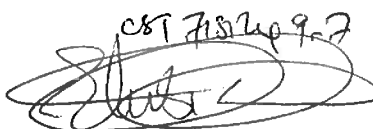
- I act as the independent environmental practitioner in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in regulation 8 of the Regulations when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- I will keep a register of all interested and affected parties that participated in a public participation process; and
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not
- all the particulars furnished by me in this form are true and correct;
- will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;
- ~~I have a vested interest in the proposed activity proceeding, such vested interest being:~~

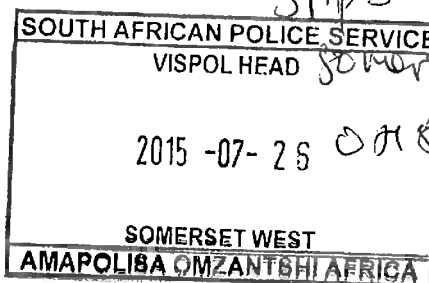
Signature of the environmental assessment practitioner:



*CST 713249-7*  


Name of company: Site Plan Consulting

Date: 26 / 07 / 2015





## **APPENDIX 3:**

**Copy of correspondence sent  
(Including newspaper advert and poster)**

# Ons onthou



Ons onthou Mandela jaar na jaar in sy verjaarsdag maand gee sewe- en sestig minute van ons tyd op een dag aan iemand op sy verjaarsdag laat iemand verdruk 'n bietjie lag

ons onthou sy woorde ons onthou sy dade ons onthou sy moed hy het geveg sewe en twintig jaar getronk vir ons bestaansreg hy het uitgekome, maar sy vyand vergewe laat lewe laat blom

ons onthou, Madiba se dans passie se lus vir die lewe se omgee se nooit baklei ons onthou vir hom wat van jou en my

deur Gert Jakobs

# Radiostasie bereik nou meer

**GEMSBOK-UPINGTON: Radio Riverside het verlede week, aangekondig dat die stasie sy uitsending gebied sal uitbrei na die Kai !Garib Munisipale gebied vanaf Augustus 2020.**

Hierdie mylpaal val saam met die 21-jaar vieringe van die stasie wat in Oktober 2020 sal plaasvind.

Gemeenskappe in die Kai !Garib-munisipale gebied het die radiostasie genader om na die uitsending uit te brei na Kai !Garib, sodat hulle aktief kan deelneem aan die aktiwiteite van die stasie.

Radio Riverside het 'n aansoek na die reguleerder - ICASA (Onafhanklike Kommunikasie-oowerheid van Suid-Afrika) gedoen om die stasie toestemming en bykomende frekwensie te gee om hierdie gemeenskappe te bedien. Die lisensie is vroeër vanjaar toegeken en Radio Riverside sal in die nuwe gebiede op 98.6 FM uitgesaai word.

Die radiostasie het strategiese vennote geïdentifiseer om te help met die realisering van hierdie langtermyn doelwit van die stasie en die rolspelers.

Riverside het met Kai !Garib Munisipaliteit, Scatec Solar en die Departement van Paaie en Openbare Werke ooreengekom om saam te werk om hierdie droom 'n realiteit te maak.

Die departement van Paaie en Openbare Werke sal die terrein voorsien vir die oordragtoerusting, terwyl Scatec Solar verantwoordelik is vir die transmissietoerusting wat op die bykomende perseel geïnstalleer sal word om met die hoofterrein in Upington te skakel.

Die Kai !Garib-munisipaliteit het 'n gebou geïdentifiseer wat aan die radiostasie toegewys sal word en 'n nuwe satellieteljee in Kakamas opgerig gaan word.

Die doel van hierdie satellieteljee is om te verseker dat die gemeenskappe van die munisipaliteit direkte en maklike toegang tot die radiostasie het en dat sommige van die programme vanaf die satellieteljee uitgesaai sal word.



Die raadsvoorsitter van Radio Riverside, Vernon Mfusi, ontvang die saamwerk ooreenkoms vanaf die Kai !Garib burgemeester Marius Louw.

Gemeenskapsradio is wanneer plaaslike mense hul eie programme vervaardig en uitsaai en aan die aktiwiteite van die stasie deelneem.

Die raadsvoorsitter van Radio Riverside, Vernon Mfusi, sê die uitbreiding van die sein is 'n geleentheid vir plaaslike jeug, organisasies, regeringsdepartemente wat in die Kai !Garib Munisipaliteit gevestig is om ook deel te neem deur middel van inhoudsproduksie en -uitsending met behulp van die satellieteljee, sodat programmeringsinhoud gemeenskappe insluit wat na Radio Riverside luister en bedien.

Die burgemeester van die munisipaliteit, Marius Louw, het tydens die ondertekening van die ooreenkoms tussen die radiostasie en die munisipaliteit gesê dat ingeligte en geontwikkelde gemeenskappe die bevordering van demokrasie verseker.

Volgens die stasiebestuurder, Thabang Pusoyabone sal die stasie na verwagting vroeg in Augustus 2020 in werking tree en ander ontwikkelings sal voortduur.

**salpura** PURE SALT OF THE EARTH

Hierdie gevestigde groep maatskappye in die sout industrie beskik oor die volgende loopbaangeleentheid vir 'n goed georganiseerde kandidaat in die pos van

**KREDITEURE KLERK (UPINGTON)**

Aansoeke word ingewag van sistematiese persone met minstens Matriek en ten minste twee jaar ondervinding in 'n rekeningkundige omgewing en in 'n soortgelyke pos en wat oor die vermoë beskik om by spertye te hou. Verdere vereistes is ondervinding in die gebruik van Xero en MS Office.

Pligte behels die prosessering van krediteure fakture op Xero, asook maandelikse rekonsiliasies en algemene administrasie.

In ruil word 'n mededingende vergoedingspakket met voordele aangebied.

Rig u aansoek en CV met verwysing OSKK voor 30 Julie 2020 aan:

**ORFFER & VAN DER MERWE**  
HUMAN RESOURCE PRACTITIONERS  
E-mail: [recruitment@ovdm.co.za](mailto:recruitment@ovdm.co.za)  
Fax: (054) 331-3338  
[www.orrfervandermerwe.com](http://www.orrfervandermerwe.com)

Indien u nie binne (3) drie weke na die sluitingsdatum gekontak word nie, kan u aanvaar dat u aansoek oorweeg was, maar dat u onsuksesvol was.



Stasiebestuurder, Thabang Pusoyabone, saam met raadsvoorsitter van Radio Riverside, Vernon Mfusi

**GROBLERSHOOP & KEIMOES**

Die volgende ouers word versoek om Marilize du Plessis op Selnr 078 061 5310 te skakel of die **Kindersorgkantoor** in Bultstraat, **Groblershoop** te besoek in verband met die beplande pleegsorgplasing van hulle kind(ers):

- Ben Ludick
- Karinies Dandy

Die volgende ouers word versoek om Lizeth Nakari van **Kindersorg Keimoes** op Selnr 062 215 8254 te skakel in verband met die verlenging van hulle kind(ers) se pleegsorgplasing:

- Arrie Lubbe
- Abie Basson
- Penelope Maasdorp
- John Reun
- Chantel van Neel
- Antonius Afrikaner
- Petrus Julie
- Dina Witbooi
- Serina van Wyk
- Berenice Tieties

**CHILD WELFARE SOUTH AFRICA**

Kinderhofverrigtinge gaan in die **Keimoes Kinderhof** gehou word met die oog op die verlenging van die pleegsorg van die kinders van:

- Oorlede Julinda Eiman
- Oorlede Jinewiv Eiman
- Berenice Tieties

Die vaders van hierdie kinders word versoek om Lizeth Nakari by bostaande nommer te kontak.

**NOTICE OF AMENDMENT OF EXISTING MINING RIGHT APPLICATION by INDUSTRIAL SALT (Pty) Ltd & CALL FOR COMMENTS: Salt Mining on Portions 10, 13, 18 and 20 of farm Groot Witpan No 327 (Gordonia RD)**

Please be advised that Application for Amendment of existing Mining Right has been lodged by Industrial Salt (Pty) Ltd to the Department of Mineral Resources: Northern Cape. Such application is made in terms of Section 102 of the Mineral and Petroleum Resources Development Act (Act 28 of 2002, as amended) for:

- Abandonment of a Mining Right held by Gordonia Salts (Pty) Ltd (on Portion 10) and Incorporation of that Right into the northern Industrial Salt (Pty) Ltd Mining Right Area (on Portion 13)
- Expansion of the Mining Right area to the NW to incorporate additional pan area on Portion 18 and Portion 20 of Groot Witpan 327.

A copy of the Draft Scoping Report of the proposed operation is available for public scrutiny at the following libraries in Upington (Paballelo Library (5 Kaizer Cres), Sandile Present Library (5 Carlton St), Public Library (Mark St)). A digital copy can be made available by Email from the contact details below.

The existing operation probably triggers the following listed activities in terms of Government Notices 983, 984 and 985 amended in 2017 under the National Environmental Management Act (Act 107 of 1998, as amended). Note the listed activities have been paraphrased here:

Listing 983: Activity 12: The development of dams where the dam water surface area exceeds 100 m<sup>2</sup>; or infrastructure or structures with a physical footprint of 100m<sup>2</sup> or more where such development occurs within a water course or within 32m of a watercourse

Listing 983: Activity 19: The excavation of soil, sand, shells, shell grit, pebbles or rock of more than 10m<sup>3</sup> from a watercourse

Listing 983: Activity 22: The decommissioning of any activity requiring a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

Listing 983: Activity 27: The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation.

Listing 984: Activity 15: The clearance of an area of 20 hectares or more of indigenous vegetation.

Listing 984: Activity 17: Any activity including the operation of that activity which requires a mining right as contemplated in section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including associated infrastructure, and / or the primary processing of a mineral resource.

Listing 985: Activity 4: The development of a road wider than 4m with a reserve less than 13,5m.

Listing 985: Activity 10: The development and related operation of facilities or infrastructure for the storage of a dangerous good with a combined capacity of 30 but not exceeding 80m<sup>3</sup>.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and / or comments, in writing, to reach the address below within 30 days of this publication. Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP:

**Site Plan Consulting PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021) 854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald.**

**DIE MAS BOEDERY (EDMS) BPK**  
Familie besigheid, gevestig net buite Kakamas beskik tans oor die volgende voltag pos:

**LONE KLERK & AKKREDITASIE ADMIN KLERK**

Die ideale kandidaat vir hierdie pos moet vlot tweetalig wees en oor goeie kommunikasievaardighede beskik. 'n Matrieksertifikaat en ondervinding in 'n soortgelyke betrekking met deeglike administratiewe en rekenaarvaardighede, veral MS Office, is 'n vereiste vir hierdie pos.

Die suksesvolle kandidaat sal saam met die kantoor-span en boekhouer werk en sal direk aan die boekhouer/sekretaresse en die direkteie verantwoordig doen.

Die suksesvolle kandidaat sal primêr verantwoordelik wees vir die loonadministratiewe funksie asook verwante plaas akkreditasies en dit sluit die volgende in:

- oplaai van inligting op die lonestelsel op 'n weeklikse basis.
- byhou van personeelrekords en arbeidverwante kontrakte.
- uitbetaling van lone.
- Globalgap, SIZA en ander plaasverwante oudits.
- alle ander ad hoc finansiële en administratiewe take in die kantoor, wynkelder en pakstoor.
- nagaan en rekonsiliasie van voertuie se logboeke asook diesellokke vir SARS.

Ons bied 'n mededingende vergoedingspakket aan vir hierdie pos.

Rig u CV en dekbrief vóór 09:00 op Maandag, 10 Augustus 2020 aan Diria De Klerk by ons kantoor: U kan die dokumente per e-pos stuur na [accounts@diemas.co.za](mailto:accounts@diemas.co.za)

**Diensaanvaarding: So spoedig moontlik.** Indien u geen terugvoering binne 2 weke na die sluitingsdatum vir aansoek ontvang nie, kan u aanvaar dat u aansoek onsuksesvol was.

# Thank you for your service



Stellenbosch physiotherapy students currently doing their practical learning hours at DSHS thank the frontline workers with small gifts and demonstrations of PPE donning and doffing (putting on and taking off) techniques

# Seun na grootskaalse soektog terug gevind

**GEMSBOK-POSTMASBURG: Die 13-jarige Ruujon Greeff wat Woensdag by die Postmasburg polisiestrasie as vermis aangemeld is, is nou veilig en by die huis.**

Dit volg na 'n grootskaalse soektog geloods is toe hy deur sy ma, wie hom laat daardie middag laas gesien het, hom Woensdag by die polisiekantoor as vermis aangemeld het.

Volgens inlging het hy 'n swartsak gepak en gesê hy gaan vir sy tannie in Groenwater kuier. Hy is deur twee boerboelhonde vergesel

Volgens brig. Mohale Ramatseba, polisiewoordvoerder, is die seun en sy honde in Groenwater opgespoor. Hy is nou by sy ma en sal mediese sorg ontvang.

Lt.kol. Andries Witbooi, stasie-bevelvoerder op Postmasburg, het die gemeenskap bedank wat bygedra het tot die seun se hereniging met sy familie.



Ma en seun is, na afloop van 'n grootskaalse soektog, dieselfde dag herenig. - Foto verskaf

Die polisie doen verder 'n beroep op die gemeenskap om nie te lank te wag om iemand as vermis aan te meld nie.

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- Listing 985: Activity 4:** The development of a road wider than 4m with a reserve less than 13,5m.
- Listing 985: Activity 10:** The development and related operation of facilities or infrastructure for the storage of a dangerous good with a combined capacity of 30 but not exceeding 80m<sup>3</sup>.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments, in writing, to reach the address below by no later than 25 August 2020. Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP:  
Site Plan Consulting PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: craig@siteplan.co.za. Contact person: Craig Donald.

**KENNISGEWING VAN AANSOEK OP WYSIGING VAN BESTAANDE MYNREG : INDUSTRIËLE SALT (Edms) Bpk & OPROEP VIR OPMERKINGS: Sout Mynwerksaamhede op Gedeeltes 10, 13, 18 en 20 van die plaas Groot Witpan No 327 (Gordonia RD).**

Neem asseblief kennis dat aansoek om wysiging van bestaande Mynboureg deur Industrial Salt (Pty) Ltd by die Departement van Minerale Hulpbronne: Noord-Kaap ingedien is. Sodanige aansoek word gedoen ingevolge artikel 102 van die Wet op die Ontwikkeling van Minerale en Petroleumhulpbronne (Wet 28 van 2002, soos gewysig) vir:

- Verlating van 'n mynreg wat deur Gordonia Salts (Edms) Bpk (op Gedeelte 10) en die inlywing van daardie reg in die noordelike Industrial Salt (Pty) Ltd se Mynregte-gebied (op Gedeelte 13)
- Uitbreiding van die Mynbou-reggebied na die NW om addisionele pan area op Gedeelte 18 en Gedeelte 20 van Groot Witpan 327 in te sluit.

'n Afskrif van die Konsep Omvangsbepalingsverslag van die voorgestelde operasie is beskikbaar vir openbare ondersoek in die volgende biblioteke in Upington (Pabellelo Biblioteek (5 Kaizer Cres), Sandile Present Biblioteek (5 Carlton St), Openbare Biblioteek (Mark St)). 'n Digitale afskrif kan per e-pos beskikbaar gestel word uit die onderstaande kontakbesonderhede.

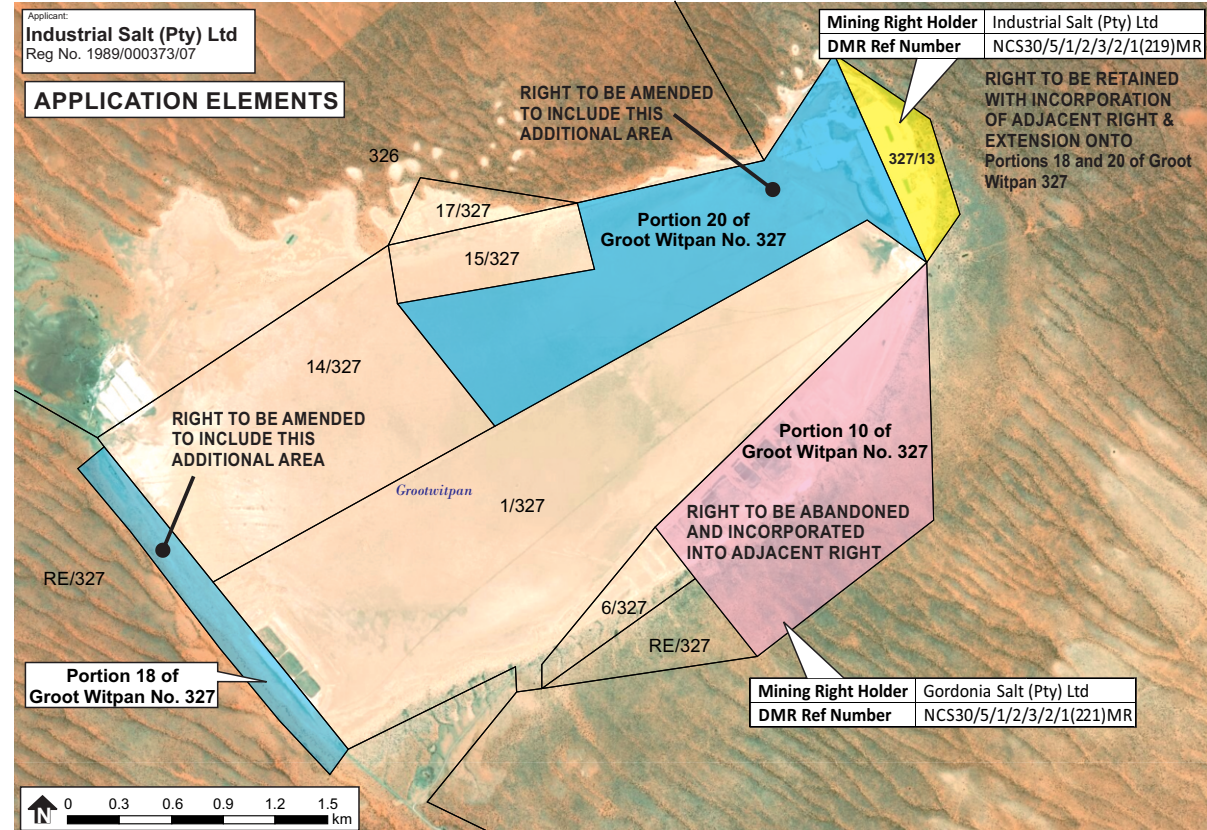
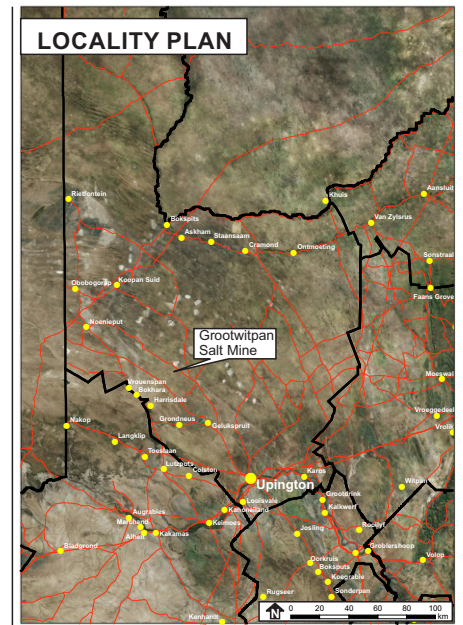
Die bestaande operasie veroorsaak waarskynlik die volgende genoteerde aktiwiteite ingevolge Regeringskennisgewings 983, 984 en 985 wat in 2017 gewysig is kragtens die Wet op Nasionale Omgewingsbestuur (Wet 107 van 1998, soos gewysig). Let op dat die genoemde aktiwiteite hier geparafraseer is:

- Lys 983: Aktiwiteit 12:** Die ontwikkeling van damme waar die damwateroppervlakte meer as 100 m<sup>2</sup> is; of infrastruktuur of strukture met 'n fisiese voetspoor van 100 m<sup>2</sup> of meer, waar sodanige ontwikkeling binne 'n waterloop of binne 32 m van 'n waterloop plaasvind.

- Lys 983: Aktiwiteit 19:** Die uitgraving van grond, sand, skulpe, dopkorrel, klipies of rots van meer as 10m<sup>3</sup> vanaf 'n waterloop
- Lys 983: Aktiwiteit 22:** Die ontmanteling van enige aktiwiteit wat 'n sluitingsertifikaat vereis ingevolge artikel 43 van die Wet op die Ontwikkeling van Minerale en Petroleumhulpbronne, 2002 (Wet No. 28 van 2002).
- Lys 983: Aktiwiteit 27:** Die opruiming van 'n gebied van 1 hektaar of meer, maar minder as 20 ha inheemse plantegroei.
- Lys 984: Aktiwiteit 15:** Die opruiming van 'n gebied van 20 ha of meer inheemse plantegroei.
- Lys 984: Aktiwiteit 17:** Enige aktiwiteit wat die bedrywighede insluit wat die aktiwiteit insluit wat 'n mynreg vereis soos beoog in artikel 22 van die Wet op die Ontwikkeling van Minerale en Petroleumhulpbronne, 2002 (Wet No. 28 van 2002), met inbegrip van infrastruktuur, en / of die primêre verwerking van 'n minerale hulpbron.
- Lys 985: Aktiwiteit 4:** Die ontwikkeling van 'n pad wyer as 4 m met 'n reservaat minder as 13,5m.
- Lys 985: Aktiwiteit 10:** Die ontwikkeling en verwante werking van fasiliteite of infrastruktuur vir die berging van gevaarlike goed (diesel) met 'n gesamentlike kapasiteit van 30 maar hoogstens 80 m<sup>3</sup>.

Om geïdentifiseer en geregistreer te word as 'n belanghebbende en / of geëffekteerde party (B&GP) en / of om kommentaar te lewer op die Konsep Omvangsbepalingsverslag, word u uitgenooi om u naam, kontakligting en belangstelling in die aangeleentheid en / of opmerkings skriftelik in te dien, nie later as 25 Augustus 2020 na die onderstaande adres. Let daarop dat slegs geregistreerde belanghebbende en geëffekteerde partye in die toekoms op hoogte sal bly van die aansoekstatus en ook afskrifte van alle relevante dokumente sal ontvang.

Site Plan Consulting Posbus 28 Strand 7139, sal u geleentheid hê om kommentaar op hierdie aansoek te lewer. Tel: (021) 854 4260. Faks: (021) 854 4321. E-pos: craig@siteplan.co.za. Kontakpersoon: Craig Donald.



**PLEASE ADHERE TO  
PPE REGULATIONS**

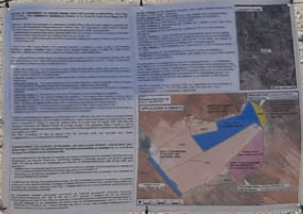


**UNAUTHORISED  
ENTRANCE  
PROHIBITED**

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**ONGEMAGTIGDE  
INGANG VERBODE**

**MINE PROPERTY / MYN EIENDOM**





*Handwritten notes:*  
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Registered Mail  
Post Office Copy

20.07.2020

Reference

J du Toit  
52 Karakoel Street  
Laboria  
Upington  
8801

**INSURED PARCEL**  
PA 473 655 875 ZA  
**A BOOK COPY**

Dept Environment & Nature Conservation  
Private Bag X6120  
Kimberley  
8301  
Attn: Head of Department

**INSURED PARCEL**  
PA 473 655 813 ZA  
**A BOOK COPY**

Dept Environmental & Nature Conservation  
Private Bag X16  
Springbok  
8240  
Attn: Head of Department

**INSURED PARCEL**  
PA 473 655 756 ZA  
**A BOOK COPY**

Dept. Water & Sanitation  
Private Bag X6101  
Kimberley  
8300  
Attn: Mr A Abrahams

**INSURED PARCEL**  
PA 473 655 699 ZA  
**A BOOK COPY**

Dept Water and Sanitation  
28 Beaconsfield Rd  
Kimberley  
8300  
Ms V Ramugondo

**INSURED PARCEL**  
PA 473 656 014 ZA  
**A BOOK COPY**

Dept Agriculture, Forestry & Fisheries  
Private Bag X5018  
Kimberley  
8300  
Attn: Head of Department

**INSURED PARCEL**  
PA 473 655 980 ZA  
**A BOOK COPY**

Dawid Kruiper Municipality  
Civic Centre  
Mutual Street  
Upington  
8801  
Attn: Municipal Manager

**INSURED PARCEL**  
PA 473 655 892 ZA  
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*Stamp 1:*  
SOUTH AFRICAN POSTAL & TELEGRAPH CORPORATION  
POSTAL CENTRE  
UPINGTON  
TEL: 081 271 1200  
FAX: 081 271 4001  
E-mail: SAPOST@postnet.co.za

*Stamp 2:*  
SOUTH AFRICAN POSTAL & TELEGRAPH CORPORATION  
20 JUL 2020  
UPINGTON



Jacob du Toit  
52 Karakoel St  
Laboria  
Upington 8801

21 July 2020

**Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.**

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This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
4. To request that you provide any comments or objections that you may have to the contents of the Scoping Report.

The amendment entails

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In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments on the Scoping Report, in writing, to reach the address below within 30 days of this notice.

Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za).  
Contact person: Craig Donald

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The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully

Craig Donald.



# SITE PLAN CONSULTING

ENVIRONMENTAL GEOLOGY, ENVIRONMENTAL IMPACT, STRATEGIC MANAGEMENT, MINE PLANNING, GIS MANAGEMENT / TRAINING

Shop 5 Goedehoop Shopping Centre, Broadway Boulevard Strand, 7140

PO Box 28 Strand 7139

Tel: 021 - 854 4260 Fax: 021 - 854 4321

Department of Environment and Nature Conservation: Northern Cape  
Private Bag X6120  
Kimberley,  
8301

21 July 2020  
Our ref: 2754

Head of Department

Dear Sir / Madam,

**Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.**

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Craig Donald

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Site Plan Consulting CC (Reg #: 1998/008366/23)

MEMBERS: Stephen van der Westhuizen TRP (SA), Bsc (Geol), MT&RP cum laude  
Craig Donald NHDT&RP, ND Surface Mine Management, MBA

CONSULTANT: Neville van der Westhuizen TRP(SA), B. Agric, MT&RP



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Private Bag X16  
Springbok  
8240

21 July 2020  
Our ref: 2754

Head of Department

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Shop 5 Goedehoop Shopping Centre, Broadway Boulevard Strand, 7140

PO Box 28 Strand 7139

Tel: 021 - 854 4260 Fax: 021 - 854 4321

Department of Water and Sanitation  
Private Bag X6101  
Kimberley  
8300

21 July 2020

Our ref: 2754

Att: Mr Abrahams

Dear Sir /Madam,

**Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.**

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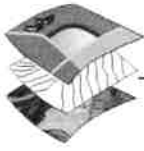
Craig Donald

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PO Box 28 Strand 7139

Tel: 021 - 854 4260 Fax: 021 - 854 4321

Department of Water and Sanitation  
28 Beaconsfield Road  
Kimberley  
8300

21 July 2020  
Our ref: 2754

Att: Ms V Ramugondo

**Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.**

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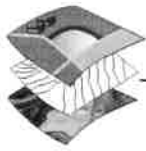
Craig Donald

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CONSULTANT: Neville van der Westhuizen TRP(SA), B. Agric, MT&RP



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Tel: 021 - 854 4260 Fax: 021 - 854 4321

Department of Agriculture Forestry and Fisheries  
Private Bag X5018  
Kimberley  
8300

21 July 2020  
Our ref: 2754

Att: Head of Department

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Dawid Kruiper Municipality  
Civic Center  
Mutual Street  
Uppington  
8801

21 July 2020  
Our ref: 2754

Att: Municipal Manager: Mr E Ntoba

Dear Sir,

**Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.**

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1. To inform you, as surrounding landowner (of Remainder of Elands Kop Been 326 (Gordonia RD)) and commenting authority, that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
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Yours Faithfully

Craig Donald.

---

Site Plan Consulting CC (Reg #: 1998/008366/23)

MEMBERS: Stephen van der Westhuizen TRP (SA), Bsc (Geol), MT&RP cum laude  
Craig Donald NHDT&RP, ND Surface Mine Management, MBA

CONSULTANT: Neville van der Westhuizen TRP(SA), B. Agric, MT&RP





**STAR EXPRESS cc**

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1641534

Acc No. 515001 Date: Shipper: Shipper ref./Waybill No. #2758

SENDER: *Star Express*  
 ADDRESS: *P.O. Box 28*  
 CITY: *Upington* CODE: *1139*  
 CONTACT: *David* TELEPHONE: *021 8541260*  
 SPECIAL INSTRUCTIONS:

RECEIVER: *Howard Salt*  
 STREET ADDRESS: *7 F. Street*  
 CITY: *Upington* CODE: *8801*  
 CONTACT: *E. Pretorius* TELEPHONE: *073 265 1619*

PLEASE COMPLETE ALL SHADED AREAS

QTY	DESCRIPTION OF CONTENTS	DIMENSIONS		VOL. Kg's	ACTUAL Kg's	TARIFF	HANDLING	SAME DAY SURCHARGE	SAT. DELIVERY/ COLLECTION	NON-DOCUMENT SURCHARGE	INSURANCE	IMPORT CUSTOMS DISBURSEMENTS	OTHER	SUB/TOTAL	VAT	TOTAL	R
INTERNATIONAL																	
DOMESTIC																	
	DOCUMENT COURIER																
	SMALL PARCEL COURIER																
	AIRFREIGHT																
	ROAD FREIGHT																
	OTHER																
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CONSUMER GUARANTEE: THE CONSIGNEE SHALL NOT BE RESPONSIBLE FOR THE LOSS OF OR DAMAGE TO THE GOODS IN TRANSIT. THE CONSIGNEE SHALL BE RESPONSIBLE FOR THE LOSS OF OR DAMAGE TO THE GOODS IN TRANSIT.

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 11:06 AM  
**To:** 'ruwayda.baulackey@dpw.gov.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Madam

This letter serves the following functions:

1. To inform you, as commenting authority and surrounding landowner (of Remainder and Portion 15 of farm Groot Witpan 327 (Gordonia RD)), that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
4. To request that you provide any comments or objections that you may have to the contents of the Scoping Report.

The amendment entails

1. The abandonment of an existing adjacent Mining Right (on portion 10 of Groot Witpan) held by sister company, Gordonia Salts (Pty) Ltd, and incorporation of that Right into the existing Industrial Salt (Pty) Ltd Mining Right Area to allow for rationalised operational and administrative functioning of the project.
2. Expansion of the Mining Right area to the NW to incorporate additional pan area on Portions 18 and Portion 20 of Groot Witpan 327.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments on the Scoping Report, in writing, to reach the address below within 30 days of this notice.

Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald.



**SITE PLAN CONSULTING**  
Tel: 021 854 4260  
Fax: 021 854 4321  
Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 11:05 AM  
**To:** 'tthebe@ncpg.gov.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Sir

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald.



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 11:03 AM  
**To:** 'ramugondov@dws.gov.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Good day

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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2. Expansion of the Mining Right area to the NW to incorporate additional pan area on Portions 18 and Portion 20 of Groot Witpan 327.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments on the Scoping Report, in writing, to reach the address below within 30 days of this notice.

Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald.



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 11:02 AM  
**To:** AbrahamsA@dws.gov.za  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Good day

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
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3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
4. To request that you provide any comments or objections that you may have to the contents of the Scoping Report.

The amendment entails

1. The abandonment of an existing adjacent Mining Right (on portion 10 of Groot Witpan) held by sister company, Gordonia Salts (Pty) Ltd, and incorporation of that Right into the existing Industrial Salt (Pty) Ltd Mining Right Area to allow for rationalised operational and administrative functioning of the project.
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Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

You / Your department is registered as Interested and Affected Party and will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald.



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 11:00 AM  
**To:** 'Hannekehanekom@yahoo.com'; 'sbmaqolo@gmail.com'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Sir / Madam

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald.



**SITE PLAN CONSULTING**  
Tel: 021 854 4260  
Fax: 021 854 4321  
Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 10:58 AM  
**To:** manager@kharahais.gov.za  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

ATT: Municipal Manager

Dear sir / madam

This letter serves the following functions:

1. To inform you, as commenting authority and surrounding landowner (of Remainder of Elands Kop Been 326 (Gordonia RD)) and commenting authority, that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Craig Donald', with a stylized flourish at the end.

Craig Donald.





**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 10:56 AM  
**To:** 'harry@kpsout.co.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Mr van Zyl

Our telephone conversation this morning refers.

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
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Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 10:54 AM  
**To:** 'jacob@kpsout.co.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Mr Du Toit

This letter serves the following functions:

1. To inform you as surrounding landowner that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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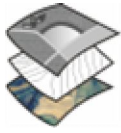
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Yours Faithfully



Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, July 20, 2020 10:52 AM  
**To:** 'mining@blaauwsgroup.co.za'  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.  
**Attachments:** GWP Salt Draft Scoping\_219MR.pdf

Dear Ms van Wyk

Our telephone conversation on Friday 17 July refers.

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
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Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

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Yours Faithfully



Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

---

**From:** Craig Donald <craig@siteplan.co.za>  
**Sent:** Monday, August 24, 2020 1:48 PM  
**To:** 'Ryan.oliver@drdlr.gov.za'  
**Subject:** Land claims in respect of 4 farms in the Gordonia Registration District

Dear Mr Oliver

I am busy compiling an update to a mining Right application which impacts on the following farms in the Gordonia RD:

- Portion 13 of Groot Witpan No 327
- Portion 10 of Grootwitpan No 327
- Portion 20 of Groot Witpan No 327
- Portion 18 of Groot Witpan No 327

Can you please check your records to determine whether any land claims are applicable to those land portions

Yours Faithfully

Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520



**APPENDIX 4:**

**Copy of correspondence received**

## Craig Donald

---

**From:** Harry <harry@kpsout.co.za>  
**Sent:** Wednesday, July 22, 2020 7:21 AM  
**To:** 'Craig Donald'  
**Subject:** RE: Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.

Hi Craig,

We would like to register as an affected party(I & AP).

We need the following:

- Special Studies
- Geohydrological Studies/Report
- Proof of application for amended Water Usage Licence
- The amount water usage which has been applied for

Regards  
Harry

---

**From:** Craig Donald <[craig@siteplan.co.za](mailto:craig@siteplan.co.za)>  
**Sent:** 20 July 2020 10:56  
**To:** [harry@kpsout.co.za](mailto:harry@kpsout.co.za)  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.

Dear Mr van Zyl

Our telephone conversation this morning refers.

This letter serves the following functions:

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1. The abandonment of an existing adjacent Mining Right (on portion 10 of Groot Witpan) held by sister company, Gordonia Salts (Pty) Ltd, and incorporation of that Right into the existing Industrial Salt (Pty) Ltd Mining Right Area to allow for rationalised operational and administrative functioning of the project.

2. Expansion of the Mining Right area to the NW to incorporate additional pan area on Portions 18 and Portion 20 of Groot Witpan 327.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments on the Scoping Report, in writing, to reach the address below within 30 days of this notice.

Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

Fax: 021 854 4321

Cell: 084 511 1520

## Craig Donald

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**From:** Pearl <mining@blaauwsgroup.co.za>  
**Sent:** Wednesday, July 22, 2020 9:22 AM  
**To:** 'Craig Donald'  
**Cc:** 'Bertus Louw'  
**Subject:** RE: Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.

Good morning Mr Donald

I discussed the email received with the relevant persons. Upington Supersout (PTY) LTD has no objection against the amendment of the existing Mining rights of Industrial and Gordonia Salt.

Regards

Pearl van Wyk  
Administrative Manager Mining  
Contact no.: 054-3375500  
Email: [mining@blaauwsgroup.co.za](mailto:mining@blaauwsgroup.co.za)

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**From:** Craig Donald <[craig@siteplan.co.za](mailto:craig@siteplan.co.za)>  
**Sent:** Monday, 20 July 2020 10:52  
**To:** [mining@blaauwsgroup.co.za](mailto:mining@blaauwsgroup.co.za)  
**Subject:** Mining Right Amendment Application by Industrial Salt (Pty) Ltd in respect of Salt Mining on the "Grootwitpan" involving Portions 10, 13, 18 and 20 of Farm Groot Witpan No 327 (Gordonia): Call for comment on draft Scoping Report.

Dear Ms van Wyk

Our telephone conversation on Friday 17 July refers.

This letter serves the following functions:

1. To inform you that an application to amend an existing Mining Right has been lodged at the Department of Mineral Resources: Northern Cape. Such application is made in terms of the provisions of Section 102 of the Mineral and Petroleum Resources Development Act.
2. To invite you to register as Interested and / or Affected Party.
3. To inform you that a draft Scoping Report has been prepared. Such report contains a brief project description and discusses the provisional expected impact of the operation on the social, built and natural environment. Such report is attached to this correspondence for your perusal.
4. To request that you provide any comments or objections that you may have to the contents of the Scoping Report.

The amendment entails

1. The abandonment of an existing adjacent Mining Right (on portion 10 of Groot Witpan) held by sister company, Gordonia Salts (Pty) Ltd, and incorporation of that Right into the existing Industrial Salt (Pty) Ltd Mining Right Area to allow for rationalised operational and administrative functioning of the project.

- Expansion of the Mining Right area to the NW to incorporate additional pan area on Portions 18 and Portion 20 of Groot Witpan 327.

In order to be identified and registered as an interested and / or affected party (I&AP) and/or to provide comment on the Draft Scoping Report, you are invited to submit your name, contact information and interest in the matter and /or comments on the Scoping Report, in writing, to reach the address below within 30 days of this notice.

Site Plan Consulting -PO Box 28 Strand 7139. Tel: (021)854 4260. Fax: (021)854 4321. Email: [craig@siteplan.co.za](mailto:craig@siteplan.co.za). Contact person: Craig Donald

Note that only registered Interested and Affected Parties will be kept abreast of the application status in future as well as receiving copies of all relevant documentation. There will be further opportunity to comment on this application, if you register as an I&AP.

The proposed activities will most likely trigger the activities in terms of the National Environmental Management Act (Act 107 of 1998, as amended) as listed in Chapter 6 of the enclosed draft Scoping report

Yours Faithfully



Craig Donald



**SITE PLAN CONSULTING**

Tel: 021 854 4260

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Cell: 084 511 1520

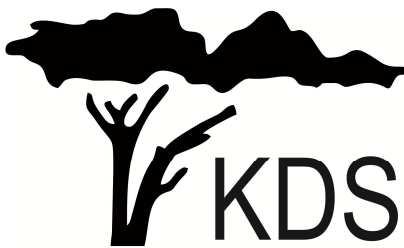
## Craig Donald

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**From:** SP du Plessis <sarel@kpds.co.za>  
**Sent:** Monday, July 27, 2020 8:34 AM  
**To:** craig@siteplan.co.za  
**Subject:** I&AP Industrial Salt  
**Attachments:** Company Profile.pdf

Good morning Craig, I hope you are well. I would like have our company registered as an interest for dust suppression. Please see attached the company profile for your perusal.

Thank you and regards  
SP du Plessis



### Dust Suppression

Kgatelopele Dust Suppression

5 Bokmakierie str, Kathu

Cell: 082 459 4655

Local B-BEE level 2 Black owned SMME

## Craig Donald

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**From:** Ryan Oliver <[ryan.oliver@drdlr.gov.za](mailto:ryan.oliver@drdlr.gov.za)>  
**Sent:** Monday, August 24, 2020 1:58 PM  
**To:** Craig Donald  
**Subject:** RE: Land claims in respect of 4 farms in the Gordonia Registration District

Noted



**From:** Craig Donald <[craig@siteplan.co.za](mailto:craig@siteplan.co.za)>  
**Sent:** 24 August 2020 01:48 PM  
**To:** Ryan Oliver <[ryan.oliver@drdlr.gov.za](mailto:ryan.oliver@drdlr.gov.za)>  
**Subject:** Land claims in respect of 4 farms in the Gordonia Registration District

**EXTERNAL EMAIL:** This email originated outside of "DRDLR Environment".  
**CAUTION:** Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Oliver

I am busy compiling an update to a mining Right application which impacts on the following farms in the Gordonia RD:

- Portion 13 of Groot Witpan No 327
- Portion 10 of Grootwitpan No 327
- Portion 20 of Groot Witpan No 327
- Portion 18 of Groot Witpan No 327

Can you please check your records to determine whether any land claims are applicable to those land portions

Yours Faithfully

Craig Donald



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