



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA



BASIC ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

FINAL

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

NAME OF APPLICANT: ILAHLE 4 KZN PTY LTD

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FILE REFERENCE NUMBER SAMRAD: KZN 30/5/1/1/2/10919 PR

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1. 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 a 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.

2. Objective of the basic assessment process

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

- (a) determine the policy and legislative context within which the proposed activity is located and how the activity complies with and responds to the policy and legislative context;
- (b) identify the alternatives considered, including the activity, location, and technology alternatives;
- (c) describe the need and desirability of the proposed alternatives,

- (d) through the undertaking of an impact and risk assessment process inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage , and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on the these aspects to determine:
 - (i) the nature, significance, consequence, extent, duration, and probability of the impacts occurring to;
and
 - (ii) the degree to which these impacts—
 - (aa) can be reversed;
 - (bb) may cause irreplaceable loss of resources; and
 - (cc) can be managed, avoided or mitigated;
- (e) through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to—
 - (i) identify and motivate a preferred site, activity and technology alternative;
 - (ii) identify suitable measures to manage, avoid or mitigate identified impacts; and
 - (iii) identify residual risks that need to be managed and monitored.

PART A
SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

3. Contact Person and correspondence address

a) Details of

i) Details of the EAP

Name of The Practitioner: Trevor Hallat
Tel No.: 071 689 2229
Fax No. : 086 407 9911
e-mail address: trevor@exm.co.za

ii) Expertise of the EAP.

(1) The qualifications of the EAP
(with evidence).

The EAP has more than 10 years of environmental management experience in mining, power generating, industrial and local government sectors. His duties entail the planning and execution of projects related to environmental management, including ISO 14001: 2004 and legal compliance audits, Environmental Impact Assessments (EIA), Financial Provisioning, Compilation of Environmental Management Programmes, Environmental Risk Assessments and Environmental Management Systems. Trevor is also a registered Natural Science Professional with the South African Council for Natural Scientific Professions (Reg nr: 300123/15). The EAP has completed various qualifications of which the following degrees rank the highest:

- BSc Geography & Environmental Management (NWU)
- BA Hons Environmental Management (NWU)
- Masters Environmental Management (NWU) Please find attached as Appendix 1 a copy of the EAPs CV.

(2) Summary of the EAP's past experience.

(In carrying out the Environmental Impact Assessment Procedure)

The EAP has completed numerous projects and impact assessments in line with the requirements of the EIA Regulations (GNR982, 2014). The list of recent projects includes:

- Vereeniging Refractories Hammanskraal Clay Quarry Waste Management Licence and EMP amendment;
- Aquarella Investment Prospecting Right Application;
- Zinoju Coal Balgray Colliery Refurbishment Project (on-going);
- Sishen Mine Lylyveld Expansion EIA;
- ArcelorMittal full EIA and Scoping as well as BAR for the decommissioning of the Existing Metallurgical Disposal Site and the Construction of a New Class B Disposal Site;
- Independent EAP Review of Various Mining Prospecting Basic Assessment Applications;

- Basic Assessment for the Development of a Coal Siding near Bronkhorstspuit;
- Involved in 15 Waste Management Licence Applications for landfill sites across the North-West Province;
- Involved in 15 Waste Management Licence Applications for landfill sites across the North-West Province;
- Involved in the Atmospheric Emissions Licence Application and full EIA for a Medical Waste Incinerator in Waltloo, Pretoria.
- Columbus Stainless Basic Assessment for the Storage of Hazardous Substances (current); and
- SA Tank Terminals Waste Management Licence Application.
- Bumatech Expansion Project Basic Impact Assessment Process;
- TerraNova Ceramics Atmospheric Emissions Licence and full EIA;
- Ceramic Industries Warehouse Development Basic Impact Assessment;
- Ceramic Industries Phoenix Factory Atmospheric Emissions Licence and full EIA;
- ArcelorMittal Vanderbijlpark Galvanising Line Conversion to Combi-Line Basic Impact Assessment;
- Universal Oil Solutions Waste Management Licence Application;

Please refer to Appendix 1 for a detailed project experience list as part of a CV.

b) Location of the overall Activity.

Farm Name:	Remainder and the Remainder of Portion 1 of the Farm Marias Heuvel No. 2947-GS, Whole Area (all Portions) of the Farm Marias Heuvel No. 13 247-GS, A Portion of the Remainder of Portion 2, A Portion of Portion 3 and A Portion of Portion 8 of the Farm Krantz Kloof No. 1245-GS, Portions 2, 3, 7, 11, 21, 22, 25, 26 and the Remainder of Portion 4 of the Farm Smalhoek No. 1282- GS, Portions 3, 4 and the Remainder of the Farm Weston No. 2365-GS, A Portion of the Farm 18 458-GS, A Portion of the Remainder and A Portion of Portion 2 of the Farm Voorslag No. 8338-GS, Whole Area of the Farm Recompense No. 4790- GS, Portions 1 and 6 of the Farm Arcadia 2179-GS and Portions 1, 10, 16, 29 and 30 of the Farm Roodepoort No. 1119-GS
Application area (ha)	6 366 ha
Magisterial district:	Uthukela Magisterial District
Distance and direction from nearest town	The area is about 5.2 km west of Ladysmith
21-digit Surveyor General Code for each farm portion	N0GS00000000111900005 N0GS00000000111900007 N0GS000000001324700002 N0GS00000000124500008 N0GS00000000217900003 N0GS00000000111900004 N0GS00000000294700004 N0GS00000000294700000

	N0GS0000000012450003
	N0GS0000000011190001
	N0GS0000000021790000
	N0GS0000000021790001
	N0GS0000000011190002
	N0GS0000000023650000
	N0GS0000000012820004
	N0GS00000000132470000
	N0GS00000000132470001
	N0GS00000000132470003
	N0GS0000000012820007
	N0GS0000000011190003
	N0GS0000000047900000
	N0GS0000000011190006
	N0GS0000000083380000
	N0GS0000000029470000

c) Locality map

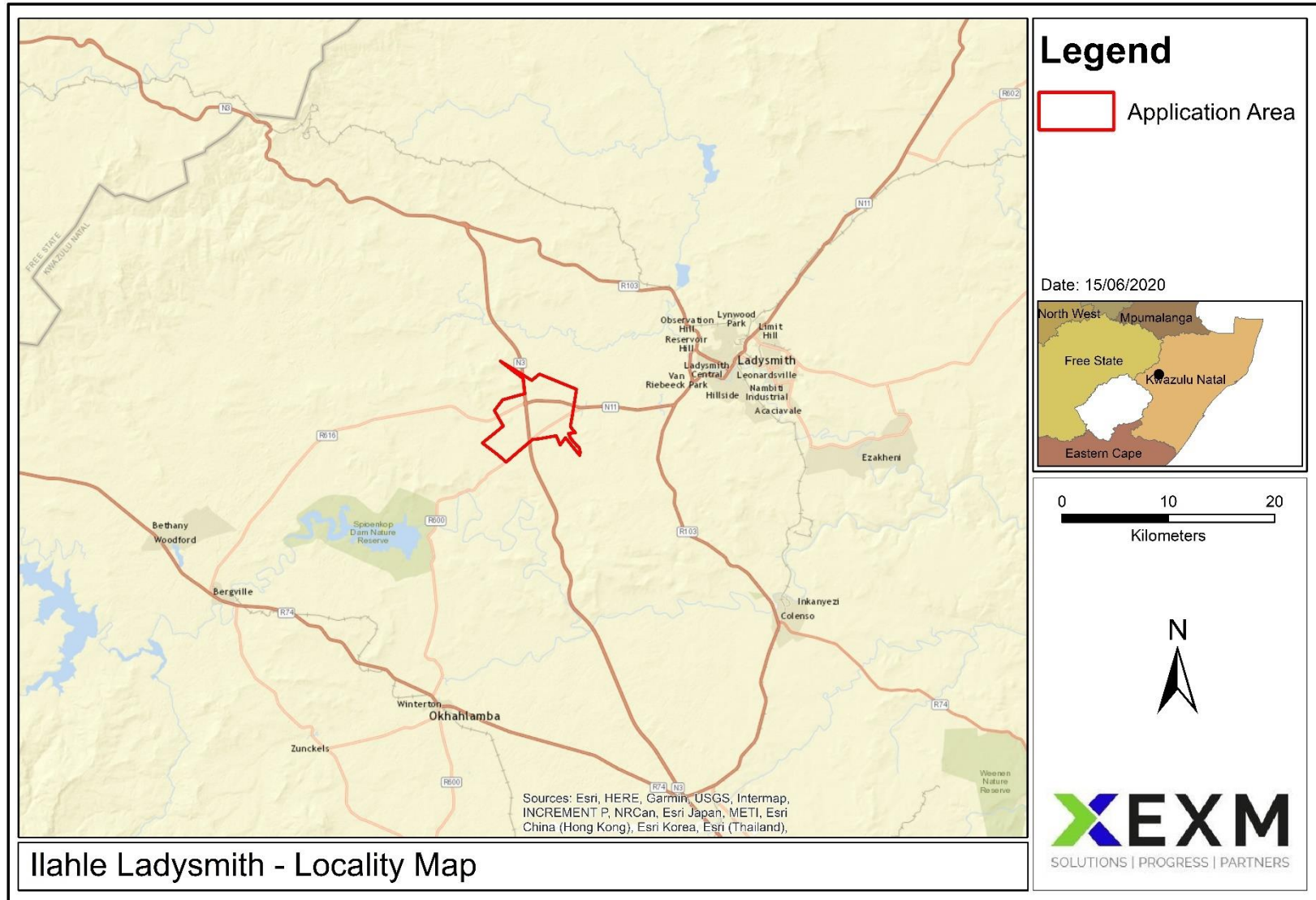


Figure 1 : Regional Locality Map

d) Description of the scope of the proposed overall activity.

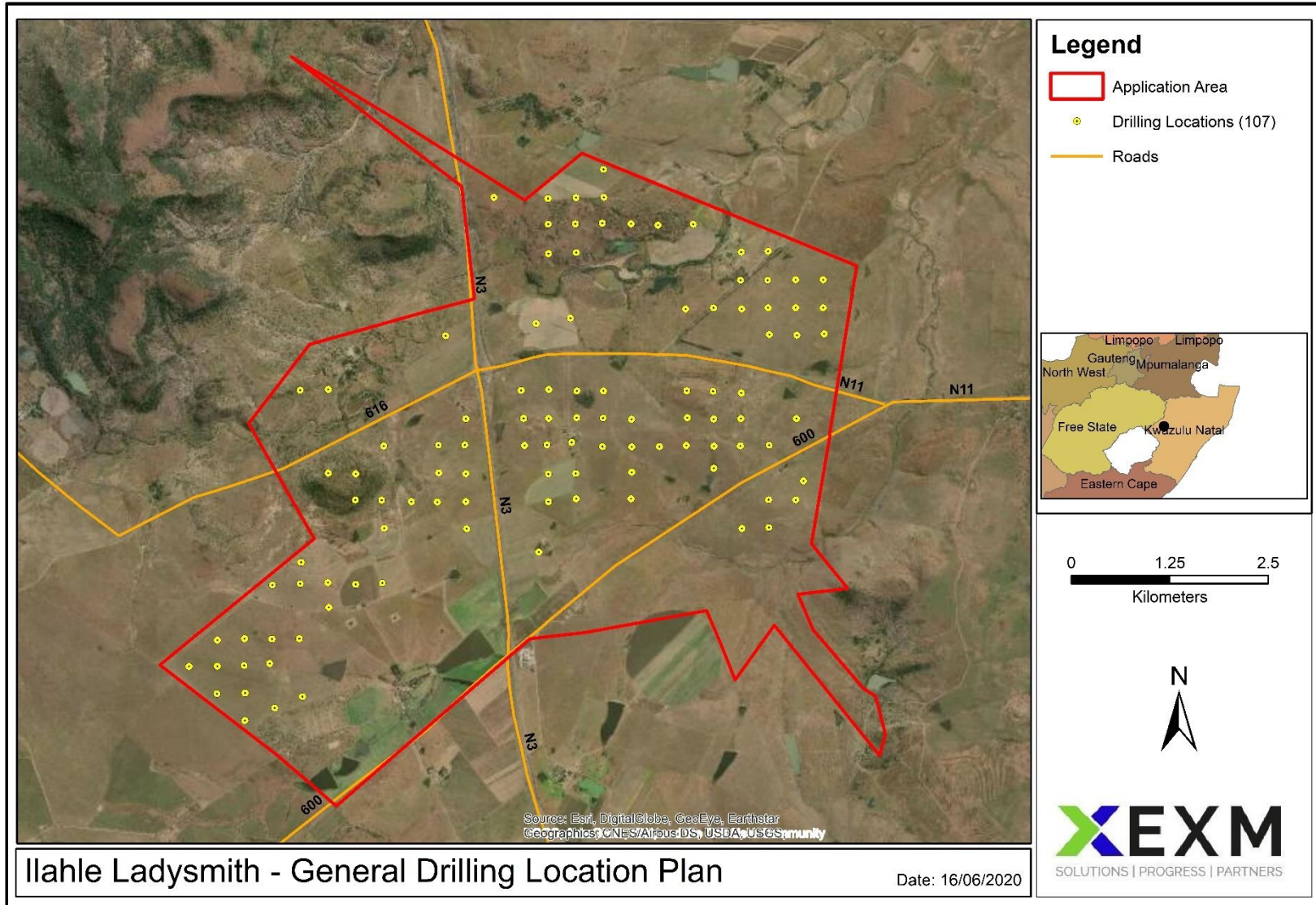


Figure 2 : Prospecting Area, indicating preliminary position of prospecting boreholes

(i) Listed and specified activities

<p>NAME OF ACTIVITY</p> <p>(E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc.</p> <p>E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)</p>	<p>Aerial extent of the Activity</p> <p>Ha or m²</p>	<p>LISTED ACTIVITY</p> <p>Mark with an X where applicable or affected.</p>	<p>APPLICABLE LISTING NOTICE</p> <p>(GNR 544, GNR 545 or GNR 546)</p>
<p>Access routes</p>	<p>Farm tracks will be used as far as possible. No additional roads will be constructed – if not required.</p>		
<p>Drill site establishment</p>	<p>A drill site of approximately 300m² will be established that will require:</p> <ul style="list-style-type: none"> - Clearing of vegetation for sumps and the drill entrance point - earth sumps for water recycling - laydown area for drill rods, fuel and chemical storage - chemical toilets <p>Approximately 107 drill sites will be established and will cover +/- 7.8 hectares.</p>		<p>GNR 983: 20, 27</p>
<p>Drilling and removal of geological cores</p>	<p>Drilling a hole of approximately 110mm in diameter and removing of rock core. Number of boreholes will be finalised once non-invasive prospecting is completed.</p>		<p>GNR 983 Activity 20</p>
<p>Casing of boreholes</p>	<p>1m² per borehole. Number of boreholes will be finalised once non-invasive prospecting is completed.</p>		<p>GNR 983 Activity 20</p>
<p>Rehabilitation of drill sites</p>	<p>See above</p>		<p>GNR 983, 20 (application for closure i.t.o. activity 22 will be conducted after drilling)</p>

(ii) Description of the activities to be undertaken

(Describe Methodology or technology to be employed, including the type of commodity to be prospected/mined and for a linear activity, a description of the route of the activity)

The prospecting activities are aimed at identifying potential **coal, limestone and psuedocoal** deposits. In order to identify the mineral targets a desktop review phase and invasive drilling phase will be undertaken.

Desktop Review Phase

The desktop studies will involve accessing all available public information on the geology, mineral occurrence and topography of the prospecting right application area, and all information on past work carried out in the area from geophysics, geochemistry, image interpretation, drilling and mining. Any literature accessed will be reviewed, collated and archived for reference. Key information during this phase will be data provided by the Council of Geoscience on historic drilling that has been undertaken within the prospecting area.

Spatial Database Compilation

Spatial information will be compiled into a GIS database for access, correlation and evaluation. The GIS system will be used and maintained for the period of the prospecting right exploration program and regularly updated as new information is generated by the exploration program. All spatial information accessed and collected in the field will be standardized using the WGS84 datum.

Remote sensing

As part of the initial review, public domain aerial photos will be acquired and a detailed geological and structural interpretation will be done on these to aid in identifying target areas that are not readily evident on the ground and to provide an independent interpretation of the geology of the area.

Satellite imagery will also be acquired to provide a more regional viewpoint of the area of interest. As before a detailed geological and structural interpretation will be done on these images to provide a more regional viewpoint on the target areas. Satellite imagery is used to complement the aerial photo interpretations as the combination of multi-spectral bands can be used to highlight certain lithology's, vegetation types, soil types, alteration minerals, etc.

Geophysical survey to be undertaken

Both airborne and ground geophysical surveys may be undertaken for the prospecting right area. This is dependent on the results of the desktop study. These surveys will be used in conjunction with the data available to the public from the Council for Geoscience.

A small airborne magnetic/radiometric survey may be carried out over the prospect and surrounding areas to map the structural geology of the area. Follow up ground geophysical surveys will then be carried out on coincident targets from the compilation of geological and geophysical data. These surveys may include ground gravity, ground electromagnetics, IP and controlled source audio magnetotellurics (CSAMT).

On completion of the desktop review a plan detailing the location of invasive drill sites will be completed allowing the holder to commence with borehole drilling to acquire core samples and delineate the minerals.

Establishment and operation of the drilling rigs will be undertaken and are the main activities associated with the invasive drilling phase. The following infrastructure or areas will be created at each drilling site: (also see Figure 3):

1. Access Road (if required)

Existing farm tracks and roads will be followed for entry and exit to all drill sites. Site locations will be determined to ensure short and easy access. All access on farms will be conducted in terms of a written agreement with the landowner. In instances where no access road is available to the site location a single track will be chosen on the basis of least environmental impact with natural habitat considered the last option. Only these tracks will be followed and will not be deviated from.

2. Parking for light vehicles

The parking area for light vehicles will be established adjacent to the drill site. The extent of this area will be kept to a minimum. Vehicles will only park in the designated area and make will use of one turning track to minimise disturbance to the environment.

3. Chemical storage area

Storage and use of hydrocarbons and other chemicals may only take place on impermeable surfaces with bunds to contain any accidental spills. Hazardous material will be stored in appropriate containers and clearly marked. Drip trays and or impermeable surfaces with bunds must be placed under machinery that has the potential to leak. Material Safety Data Sheets will be available for all drilling and other chemicals kept on site.

4. Water delivery and settling sumps

When core drilling will be undertaken a number of settling sumps will be excavated and lined with impervious plastic sheets. The purpose of these sumps is to recycle water and drilling fluids by means of gravity causing heavier materials (e.g. drill cuttings) to settle and “clean” water being produced for re-use. The drill cuttings form a sludge which is collected in the sumps. These sumps will be fenced, where required, to prevent livestock and public access. The plastic sheets will be removed and sumps will be backfilled on completion of drilling. If required, the remaining sludge in sumps is to be treated with a suitable bio-remediation product prior to backfilling or disposal.

5. Drill rig

In most cases the drill rig will be a self-contained, truck-mounted unit that will be accompanied by a compressor and a generator. The drill rig will be driven to site and mobilised in the desired location, positioned over the hole site and will be stabilised. The footprint of disturbance for a prospecting rig and associated equipment is generally smaller than 300 m². Plastic sheets and drip trays will be placed underneath the rig for the duration of the drilling process at each site in order to avoid hydrocarbon spills and contamination. The full extent of the drill sites will be staked out and the drill crew will not operate beyond these boundaries. Depending on the locality, this perimeter may be fenced, marked with bunting or barricading. Please refer to Figure 3 for a layout plan of the drilling site.

6. Drill core storage area

During core drilling a laydown area for the extracted core samples will be established within the footprint of the drill site. This area is usually 10m x 2m and is used to place the extracted core in sequence (according to depth) for later analysis by an appointed geologist. Core trays will be used to contain the core samples.

7. Drill rod storage area

During the drilling process the drill rods are usually kept on tressels (specially built stands) or on the back of a truck for easy access or within the drill site area.

8. Vegetation and topsoil stockpile areas (if required)

Vegetation and topsoil will only be stockpiled in instances where settling sumps are required i.e. core drilling. During the excavation process the topsoil and available vegetation will be placed adjacent to the sumps. This will also serve as a stormwater diversion berm. The excavated material will be backfilled into the rehabilitated sumps on completion of the drilling process.

9. General and hazardous waste receptacles

Separate, marked receptacles (containers) will be provided for the storage and disposal of hazardous and general wastes at the waste generation points. The purpose of this is to ensure that general and hazardous waste be disposed of separately at a licenced facility.

10. Chemical toilet

Chemical toilets will be provided for the drilling crew. The toilets will be supplied and managed by a specialist contractor and the sewage disposed of at the nearest sewage farm, or as required by the local authority. The toilets will be cleaned on a weekly basis for the duration of the drilling programme.

11. Safety fencing / barricading

The full extent of the drill sites will be staked out and the drill crew will not operate beyond these boundaries. Depending on the locality, this perimeter may be fenced, marked with bunting or barricading signage to prevent public or livestock access. The drill sites will be clearly demarcated as a dangerous working area. The fences will remain until all hazardous machinery and material have been removed and the sumps (if any) have been backfilled.

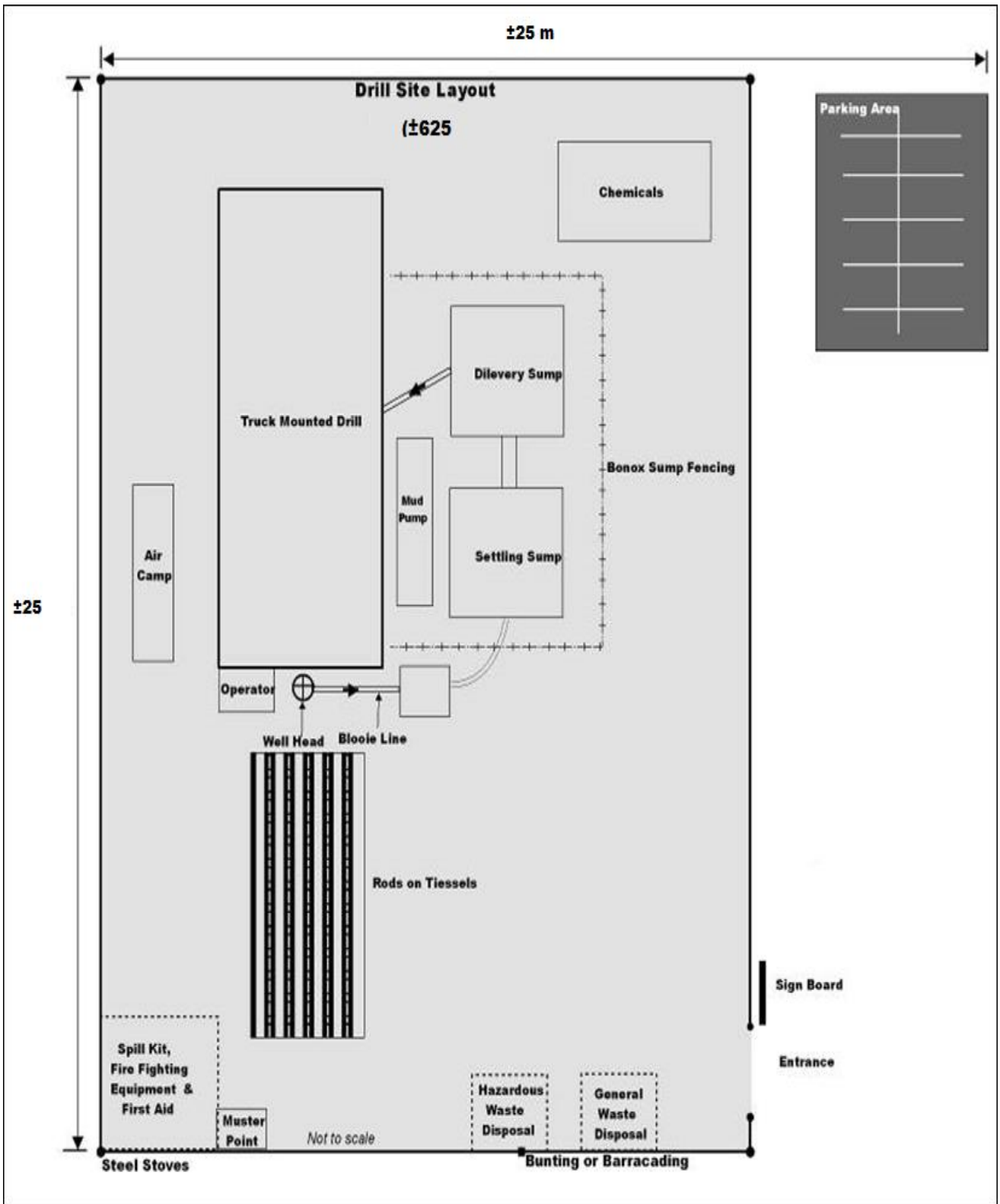


Figure 3 : Proposed drill rig layout

e) Policy and Legislative Context

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT (a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process)	REFERENCE WHERE APPLIED	HOW DOES THIS DEVELOPMENT COMPLY WITH AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT. (E.g. In terms of the National Water Act a Water Use License has/ has not been applied for)
National Environmental Management Biodiversity Act, no. 10 of 2004	Part B, EMPr	<u>Authorisations</u> No permit requirements Permits must be obtained if protected species are removed. <u>Management Actions</u> Protection of sensitive plant species Management of invasive plant species
Conservation of Agricultural Resources Act, no. 43 of 1983	Part B, EMPr	<u>Authorisations</u> No permit requirements <u>Management Actions</u> Management of invasive plant species and erosion.
National Water Act, no. 36 of 1998 and associated Regulations	Part A, Pre-mining environment & EIA Part B, EMPr	<u>Authorisations</u> No permit requirements Permits/licences must be obtained if any listed activities are triggered. <u>Management Actions</u> Protection of water resources Locality restrictions to watercourses
Mineral & Petroleum Resources Development Act, no. 28 of 2002	Part B, EMPr	<u>Authorisations</u> Application for a prospecting right submitted. <u>Management Actions</u> Closure costing updates and provisions Auditing and performance assessment.
Provisioning Regulations, 2015 Published under Government Notice R1147 in Government Gazette 39425 of 20 November 2015	Final rehabilitation and closure plan attached as Appendix 6.	<u>Final rehabilitation and closure plan attached as Appendix 6.</u>
National Environmental Management Act, no. 107 of 1998 and Regulations	Part B, EMPr	<u>Authorisations</u> Application for an Environmental Authorisation. <u>Management Actions</u> Adherence to the duty of care and other environmental management principles
National Environmental Management Air Quality Act, no. 39 of 2004 and Dust Control Regulations	Part B, EMPr	<u>Authorisations</u> No licence requirements <u>Management Actions</u> Control of fallout dust and emissions Minimise disturbance
Municipal Biodiversity Summaries Project: SANBI	Part A, Pre-mining environment & EIA	<u>Authorisations</u> No authorisation requirements <u>Management Actions</u>

		Drill site selection requires an environmental officer approval.
National Heritage Resources Act, no. 25 of 1999	Part A, Pre-mining environment & EIA Part B, EMPr	<u>Authorisations</u> No permit requirements. Permits must be obtained if heritage sites are located on proposed drilling sites <u>Management Actions</u> Conservation of heritage and cultural resources. Final rehabilitation and closure plan attached as Appendix 6.

f) Need and desirability of the proposed activities.

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

The activity of prospecting for coal creates the opportunity to develop the mineral resources of South Africa and is outlined in the national development frameworks and policies. The preferred location for the activity is in the KwaZulu Natal province. The prospecting activity has the potential to result in a Mining Right Application together with a Social & Labour Plan (S&LP) which will contribute to Local Economic Development in the area in general. The implementation of the S&LP will also benefit staff through training (skills development) and bursary programmes.

The proposed project has the potential to make a contribution to local taxes as well as the Gross Domestic Product GDP. Eventually the mining of minerals will allow for continued supply to other industries who also contribute to local taxes and GDP. The mining operations will provide coal to tile factories and is an essential input product for the tile manufacturing process. The tile factories provide employment opportunities to numerous employees and provide tiles to infrastructure and other developments in South Africa. The tile factories also export a portion of the tiles and contributes to the South African (GDP).

Although prospecting is not seen as an activity that significantly and sustainably contributes to an area's economy, it is a precursor to possible mining activities. The activity of mining has numerous social and economic benefits on a local, regional and national scale. These include:

1. Job creation
2. Skills development
3. Small Medium and Micro Enterprises (SMME) development
4. Local economic development
5. Contribution to local and national tax income (royalties, companies tax etc.)
6. Contribution to the national gross domestic product

The need to prospect is therefore a crucial step in being able to ascertain whether the geology and mineral reserves warrant further investigation for potential mining activities and in turn the benefits indicated in points 1-6.

g) Motivation for the overall preferred site, activities and technology alternative.

The site location has been identified due to the underlying geology that has the potential to support coal bearing strata. The location of individual drill sites is however not fixed to a geographical element within the project location and alternative drill sites are available on consideration of

biodiversity, water, land use and cultural aspects.

The technology to be employed includes both invasive and non-invasive tasks. The invasive tasks (on site) include establishment of a drill rig and contractors camp. The drill rig technology is dependent on the geology, but alternatives are available for the use of drilling lubrication.

h) Full description of the process followed to reach the proposed preferred alternatives within the site.

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

i) Details of the development footprint alternatives considered.

With reference to the site plan provided as Appendix 3 and the location of the individual activities on site, provide details of the alternatives considered with respect to:

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity;
- (e) the operational aspects of the activity; and
- (f) the option of not implementing the activity.

(a) The property has been identified due to its geological significance and potential to produce coal, limestone or pseudocoal. Due to the nature and extent of the geology and mineral rights available in the area it is not possible to identify an alternative property as the geology is directly associated with the applied area. Numerous alternative drill sites are available and is dependent on the site conditions. The current layout is developed in-line with an economically acceptable grid (SAMREC). The SAMREC grid was amended in consideration of the drill sites relative location to water resources (all drill sites within 100m of a watercourse or drainage line was removed) and location of existing land uses.

(b) The activity to be undertaken is prospecting. Prospecting is an activity that is defined as a formalised process with a systematic approach to identify the presence of a mineral resource and includes invasive (drilling) and non-invasive (desktop studies) activities. Alternative activities that can be undertaken include:

- Percussion drilling
- Reverse circulation drilling
- Diamond core drilling
- Bulk sampling (including scraping and trenching)

The activity to be undertaken is not decided by the EAP but defined by the geology of the area. Prospecting for this project will involve drilling (percussion, RC or core) depending on the type of rock and samples required. The standard approach is to commence with percussion/ RC drilling as it is least costly to identify a possible target.

(c) The South African Code for the Reporting of Exploration Results, Mineral Resources & Mineral Reserves describes intervals of 350 m x 350 m as a resource that can be defined as measured and linked to a financial feasibility. Due to the extent of the properties applied for and the availability of existing drilling information it is envisaged that a reconnaissance level of drilling at intervals of 2 000 meters will be the initial requirement, but grid intervals can be at 350-meter intervals. From the

reconnaissance levels grid environmental sensitivities were included (water, topography, and land use) and drill sites that will intrude these sites were either removed or its locations changed.

- (d) No feasible alternative technologies are available to conduct the prospecting drilling due to the basic nature of the process. Alternative technologies with regard to the management of water, dust, and noise will be considered as mitigation measures in this report.
- (e) Operational alternatives are discussed in the environmental impact assessment and management plan depending on the impact significance and mitigation required.
- (f) The no-go alternative will impact on the potential development of mineral resources in South Africa. Mineral resource development results in direct employment and social development of an area and contributes to the GDP and taxes in South Africa. Should this project not go ahead the potential socio-economic benefits will not be realised as prospecting is a forerunner to mining. Of greater importance is the requirement to establish a supply of coal for electricity generation, with Eskom already under a supply shortfall. The project has the potential to identify potential sources of coal to be used in generating electricity in South Africa.

i. Details of the Public Participation Process Followed

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

Appendix 2.1: IAP Database

Appendix 2.2: Notification Letter of Project

Appendix 2.3: Proof of Site Notices

Appendix 2.4: Proof of Newspaper Advert

Appendix 2.5: Notification letter of BAR review

Appendix 2.6: Comments and responses

Appendix 2.7: Communication with ward councillor

Appendix 2.8: Notification of extended PPP consultation period

The public participation process was conducted in-line with the requirements of Chapter 6 of the National Environmental Management Act Environmental Impact Assessment Regulations, Regulation 982 and included the following processes:

1. Identification of Interested and Affected Parties (IAPs);
2. Notification of IAPs regarding the proposed project;
3. Gathering comments, issues and concerns from IAPs;
4. Responding to IAP comments, issues and concerns;
5. Providing IAPs with the opportunity to review and comment on the basic assessment report.

Each of the processes is described in detail in the sections 1-5 below.

1. Identification of Interested and Affected Parties

The application area extends 6 366 hectares of mixed land uses from rural farmland, crop production and mining consisting of one property with numerous portions. Interested and affected parties that were identified include the following:

- Landowners and legal occupiers within the project area
- Neighbouring landowners
- IAPs that registered as part of the advertisement and site notices
- District Municipality: uThukela District Municipality
- Local Municipalities: Alfred Duma Local Municipality
- Local Municipalities: Okhahlamba Local Municipality
- Organs of State:
 - o Department of Water and Sanitation (KZN)
 - o AMAFA KZN Heritage
 - o Ward councillor.
 - o Land Restitution Commission
 - o Department of Agriculture, Forestry and Fisheries (DAFF)
 - o KZN Conservancies
 - o Head of Department Kwa-Zulu Natal
 - o Ezemvelo KZN Wildlife (EKZNW)
 - o KZN Department of Agriculture and Environmental Affairs
 - o DAEARD
 - o Department of Human Settlements
 - o Department of Cooperative Governance and Traditional Affairs (COGTA)
 - o Department of Rural Development & Land Reform
 - o Commission on restitution on Land Rights
 - o Transnet

The details of all interested and affected parties (IAPs) were compiled into an IAPs database that is included as Appendix 2.1.

2. Notification of Interested and Affected Parties

EXM notified IAPs by providing each person with an information letter that included a description of the project, the public participation process, potential environmental impacts and how they can get involved. The notification letter also included a comment sheet whereby all IAPs can respond with issues, concerns or comments. Due to the rural nature of the project area it was decided to provide postal, fax, telephonic and electronic methods of sending the notification letter as well as gathering responses. The notification letter was sent in English with no request for translation to other languages. Copies of the notification letter are provided in Appendix 2.2.

Other forms of notification included the placement of Site Notices (as per the Regulation required size) at various locations. Site notices (A2 and A3) were placed at various locations on 5 December 2019. The notices were placed in both English and isiZulu.

1. At the N11 and N3 crossing. Latitude 28°35'16.35"S & Longitude 29°36'32.38"E
2. At the N11 and R600 crossing. Latitude 28°36'57.98"S & Longitude 29°36'44.27"E
3. At the N3 and R600 crossing. Latitude 28°36'57.98"S & Longitude 29°36'44.27"E

The site notices are available whereby IAPs could register to be provided with more information on the project. Photos of the site notices are provided in Appendix 2.3. In addition, notification letters were attached to certain farms within the project area. An English advert was published in the local Ladysmith Gazette on 6 December 2019. The advert included a brief project description, location of the project and methods to register as an IAP. Appendix 2.4

3. Gathering Comments, Issues and Concerns from IAPs

Refer to Table ii below for the comments and issues received as well as responses thereto. Proof of communication is attached as Appendix 2.6.

4. Responding to Comments, Issues and Concerns from IAPs

The responses are included in the BAR (Table ii below) that is provided to the respective IAPs for review as part of the extended public participation period. These responses are therefore provided to the commenting IAP as part of the draft BAR.

5. Review and Commenting on the Basic Environmental Impact Assessment Report (BAR)

All identified IAPs have been provided access to the BAR for review and comment. The IAPs were informed via emails or an SMS of the availability of the BAR for review. Hard copies have been delivered to the DMR as well as the DWS.

The BAR was available for review and comment from the 21st February 2020 – 22nd of March 2020 at the following locations:

- Electronic copies provided via Email and available on request from trevor@exm.co.za
- Electronic copies available at the dropbox link below:
<https://www.dropbox.com/sh/rl5mqu2hz50xhvy/AACqG0lf42YxnhUIOmvdwGza?dl=0>
- A hard copy was available at the Ladysmith Library (Murchison St, Ladysmith)

Notification was by email and SMS. Please find attached as Appendix 2.2 a copy of the notification and report review. Due to the national lockdown in terms of the Disaster Management Act and subsequent directions issued by the Department of Environment, Forestry and Fisheries (DEFF), EXM has decided to provide the identified IAPs an additional 30 days to review the documents in support of the BA and to raise comments. The Basic Assessment Report (BAR) is available for review at the following locations:

Dropbox electronic link:

<https://www.dropbox.com/sh/rl5mqu2hz50xhvy/AACqG0lf42YxnhUIOmvdwGza?dl=0>

Onedrive electronic link: https://exmadvisoryservices-my.sharepoint.com/:f/g/personal/trevor_exm_co_za/EvMrauLxY6ZBf1PT10APPgBXJRvS7aEfqsSr1oC7J8zw?e=OjN3n9

Electronic copy: trevor@exm.co.za (on request)

ii. **Summary of issues raised by I&APs**
 (Complete the table summarising comments and issues raised, and reaction to those responses)

Interested and Affected Parties		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.					
AFFECTED PARTIES					
Landowner/s	X				
Jane Drew	X	10 December 2019	<ul style="list-style-type: none"> Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an “interested and affected party. We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood. 	<ul style="list-style-type: none"> The positioning of the boreholes as per the final layout plan of the Basic Assessment Report (BAR) takes into account all water courses on site and the drilling sites will not be situated within a 100m buffer from dams, wetlands or streams to avoid impacts. The Environmental Management Programme (EMPr) provides measures that must be implemented to prevent or minimise impacts on water resources. The applicant is committed to rehabilitate all prospecting sites according to the closure and rehabilitation plan. The mitigation measures contained in the EMPr makes provision to prevent/minimize impacts disturbance caused by the prospecting activities. The EMPr makes provision for the applicant to approach all relevant stakeholder to reach an agreement should prospecting be conducted on areas where cultivation and other farming activities are conducted. Your comments will be incorporated in the BAR and EMPr that will be submitted to the authorities. 	Section vii, Table 2, page 42-32
Jane Drew	X	14 September 2020	<ul style="list-style-type: none"> The below message was sent to Mr Khumalo on 10th December 2019. <p>Dear Mr Khumalo,</p> <p>Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we</p>	Jane Drew was added as an interested and affected party. A response to the comment was provided on the 21 st of February 2020 as indicated above.	Appendix 2.6

			<p>request to be registered as an “interested and affected party”.</p> <p>We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.</p>		
Jane Drew	X	14 September 2020	<ul style="list-style-type: none"> According to what I can see in your report, our concerns as recorded below were attributed to Justin and Allan Green and not to my husband, Bryan Drew. We are horrified to see on your drill site map that the majority of the drilling points are on our home farm; literally all around our house! In order to access the one proposed drilling area, all vehicles would have to drive past our house, through our yard and over the Dewdrop River. This is completely unacceptable to us! It will disrupt our lives in many ways (e.g. noise and dust pollution from vehicles driving around our house, jeopardizing our privacy, etc). 	<p>The preliminary borehole locations as indicated in Figure 2 has been plotted according to the South African Code for the Reporting of Exploration Results, Mineral Resources & Mineral Reserves, using 350m by 350m grids, taking into account buffers from water courses and infrastructure such as roads.</p> <p>It should be noted not all of the boreholes indicated in the plan in Figure 2 of the BAR will be drilled. If no resources is found at test sites in a specific area, then the prospecting activities will move to another area.</p> <p>Mitigation measures stipulated in the EMPr focuses on the prevention of impacts and contains sufficient controls to adequately manage the proposed activities in a manner to minimise potential environmental impacts.</p> <ul style="list-style-type: none"> Drill sites will not be located within 100 meters of farming infrastructure. Areas where crop cultivation is conducted as well as residential units and other farming structures such as sheds will be avoided by the drilling operations. Appropriate buffers from the residential units and farming structures will be adhered to. Speeds limits (40km/h) on farms roads will be enforced. Where economic land use such as crops (if any) will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation. Drilling sites must be selected to minimize disturbance of current land use. 	Appendix 5 EMPr
Jane Drew	X		<ul style="list-style-type: none"> We always experience security issues when "outsiders" have access to these parts of our farm. We are not prepared to take this risk. 	<p>The following mitigation measures have been included in the EMPr related to safety</p> <ul style="list-style-type: none"> Drilling contractors will not be allowed moving outside of designated areas. Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. All personnel that have access to the property will be provided with access cards. All personnel that have access to the property need to be made visible. Drilling contractors to be housed off site. 	Appendix 5 EMPr

Jane Drew	X	14 September 2020	<ul style="list-style-type: none"> Furthermore, we are totally against the use of "hazardous" materials and waste so close to our crop and livestock operation and so close to the Dewdrop River and our dams. 	<p>A 100m buffer zone has been established around all water resources to prevent impacts A hierarchy approach will be implemented to mitigate potential impacts, therefore the 100 meter buffers will be implemented to prevent any disturbance.</p> <p>The following mitigation has been included in the EMPr to prevent/minimise impacts on surface and groundwater, as well as users:</p> <ul style="list-style-type: none"> Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. <p>Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals).</p>	Appendix 5 EMPr
Jane Drew	X	14 September 2020	<ul style="list-style-type: none"> Another major concern is that drill sites are proposed where we have pivot irrigation. This is also totally unacceptable to us! We rely heavily from a financial point of view on the small areas that we are able to cultivate. We definitely cannot afford to have this aspect of our farming operation jeopardized! 	<p>Drill sites will not be located within 100 meters of farming infrastructure.</p> <p>Areas where crop cultivation is conducted as well as residential units and other farming structures such as sheds will be avoided by the drilling operations. Appropriate buffers from the residential units and farming structures will be adhered to.</p>	Appendix 5 EMPr
Jane Drew	X	14 September 2020	<ul style="list-style-type: none"> Another large drilling area is across the road (i.e. the D344) from our house. This area of land is prime grazing land, which we cannot afford to lose. It angers and saddens me deeply that someone, for their financial gain, would even entertain the thought of conducting mining operations that would so directly affect the home and livelihood of others. 	<p>Speeds limits (40km/h) on farms roads will be enforced.</p> <p>Where economic land use such as crops (if any) will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation.</p> <p>Drilling sites must be selected to minimize disturbance of current land use.</p>	

GREEN H RANCHES CC (Justin and Allan Green)	X	22 March 2020	As landowners of a portion of the proposed site, we would like to express the following concerns regarding the application lodged by Ilahle 4 KZN (Pty) Ltd for a prospecting right in Ladysmith, KwaZulu Natal and the related Draft Basic Assessment Report (BAR) and Environmental Management Programme (EMPr):		
	X	22 March 2020	<p>1. Public Participation Process Regulation 41(2)(b) of GNR 326 requires that landowners as well as occupiers of the site and occupiers of land adjacent to the site must be notified of the application. Although the landowners and adjacent landowners of farms commonly referred to as Middledale & Smalhoek (Green H Ranches CC) were notified of the application, there is no evidence to suggest that the occupiers of the farms Middledale & Smalhoek, who are employed by Green H Ranches CC (the landowner), and/or its subsidiaries, were notified of this application. There are currently 15 families and over 100 people who permanently live on these farms, none of whom received notification of this public participation process or were afforded the chance to participate.</p>	<p>The comments are noted. Site notices translated in Zulu have been erected around the site to inform occupiers of the site. The site notices have not been removed as yet and will only be removed after the completion of the application process.</p> <p>Attempts have been made via two emails sent to you on the 2nd of June and on the 30th of April 2020 to obtain details of representatives of the families on site to explain the proposed project. No responses have been received. Due to the restrictions posed by the directions received from the DEFF, physical meetings cannot be conducted and therefore we require contact details of a person representing the land occupiers to consult with them telephonically or via email.</p>	Appendix 2.6
	X	22 March 2020	Regulation 41(2)(e) requires that notice must be given to all potential I&APs “using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.” There are several occupants dwelling on the Farms Middledale & Smalhoek, who have not completed formal schooling and cannot read and write in English and are therefore unable to fully access the BAR and are ultimately excluded from participating or commenting.	<p>Please refer to Appendix 2.6 for the emails sent.</p> <p>It is not anticipated that the land occupiers will be affected by the proposed prospecting activities.</p>	
	X	22 March 2020	Regulation 41(2) further requires that the public participation process must take into account any relevant guidelines as contemplated in Section 24J of NEMA. GN 807 of 10 October 2012 “Publication of Public Participation Guideline” was published in terms of Section 24J of NEMA and requires, under Section 4.1(a), that a site notice be displayed for the duration of the commenting	<p>The comments are noted. The site notices have not been removed as yet and will only be removed after the completion of the application process.</p>	Appendix 2 – proof of site notices

		period. Pg. 18 of the Draft BAR, under Section 2, states that “the site notices were available for a period of three (3) weeks,” which is a shorter duration than the legally required public participation period of 30 days. This is of particular concern as the site notices were the only form of notification provided in isiZulu, which is the predominant language of the occupiers of the site and land adjacent to the site.		
X	22 March 2020	Regulation 3(1) of GNR 326, in reference to timeframes as part of an EIA process, states that “if the last day of the period falls on a Saturday, Sunday or public holiday, that period must be extended to the end of the next day which is not a Saturday, Sunday or public holiday.” The BAR states that public participation runs from 21 February 2020 until Sunday, 22 March 2020. Furthermore, Regulation 3(5) states that “where a prescribed timeframe is affected by one or more public holidays, the timeframe must be extended by the number of public holiday days falling within that timeframe.” Human Rights Day, a public holiday in South Africa, falls on 21 March 2020, which is within the 30-day public participation period. Public participation must therefore be extended to account for the public holiday and to ensure that it does not conclude on a Saturday or Sunday. All I&APs should be timeously notified of this extension.	The comments are noted. An additional 30 days commenting period is provided to ensure that all I&APs are provided with sufficient time to review the BAR and to provide comments.	
X	22 March 2020	Additionally, Regulation 3(2) and (3) requires that public participation must not be conducted over the period of 15 December to 5 January. It is noted that the site notices “were placed at various locations on 5 December 2019” (pg. 18) and “were available for a period of three (3) weeks” (pg. 18). The period that the site notice were available therefore coincided with the exclusion period of 15 December to 5 January. The BAR does not state that these notices were available for any additional periods.	The comments are noted. The site notices have not been removed as yet and will only be removed after the completion of the application process. The public consultation process is on-going and additional time is provided to raise comments.	Appendix 2 – proof of site notices

	X	22 March 2020	<p>Given the number of procedural flaws in the current and previous public participation process, we therefore request that an additional public participation process is undertaken that is fully compliant with the EIA Regulations (2014, as amended) whereby:</p> <ul style="list-style-type: none"> • All I&APs are provided a full 30 days to comment and where the commenting period does not conclude on a Saturday or Sunday; • All occupants of the affected sites are notified in a manner that is appropriate, taking into account language abilities and literacy levels; and • Site notices are displayed for the duration of the commenting period to ensure that all potential I&APs are provided an opportunity to register and participate. 	<p>The comments are noted. An additional 30 days commenting period is provided to ensure that all I&APs are provided with sufficient time to review the BAR and to provide comments.</p> <p>Attempts have been made via two emails sent to you on the 2nd of June and on the 30th of April 2020 to obtain details of representatives of the families on site to explain the proposed project. No responses have been received.</p> <p>Site notices are still on display.</p>	Appendix 2.6
	X	22 March 2020	<p>1. Landowner Consent/ Agreements and Compensation</p> <p>The BAR states that “relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling” (pg. 38). Furthermore, the BAR states that “several drill sites are still located within cropland but agreement or compensation will need to be sought should the specific site be developed” (pg. 43).</p>	<p>These comments are noted. The land owners will be consulted prior to the commencement of the invasive prospecting phase where current land use will be affected by the drilling operations. The drilling operations will avoid cultivated land such as crops and orchards, if any. Where economic land use such as crops will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation.</p>	N/A
	X	22 March 2020	<p>To date, no written agreements are in place with any of the affected landowners and no compensation has been agreed upon where viable agricultural land will be affected. We are therefore requesting clarity on when negotiations will take place and how compensation will be calculated.</p>		
	X	22 March 2020	<p>It is also noted that “the nature of prospecting involves invasive drilling of sites not exceeding 15m x 20m. The drill sites are not fixed and can be relocated by 1-50 meters” (pg. 57). We would</p>		

			like to confirm that drill sites may not be relocated without prior consent from landowners.		
X	22 March 2020	<p>3. Rehabilitation Measures and Mine Closure Plan</p> <p>The EMPr (pg 122 of the PDF) and the Mine Closure Plan (pg. 132 of the PDF) provide the proposed rehabilitation measures. These measures are insufficient based on the following criteria:</p> <ul style="list-style-type: none"> The veld grass Themeda Triandra is prevalent in the prospecting area. This grass is highly valuable for livestock farming, and impossible to replace and/or restore to original state within a 2 week period, if at all. 	<p>The rehabilitation activities will entail revegetation of the disturbed areas with plants that are dominant in the specific target area. The rehabilitation process is systematic and includes maintenance and aftercare to ensure that the activities have been successfully implemented. The areas will be reseeded if required to ensure sustained vegetation growth.</p>	Appendix 6 – final rehabilitation plan	
X	22 March 2020	<ul style="list-style-type: none"> The study fails to take into account the impact of wind on the spread of dust. Dust is particularly harmful to humans (allergies), grasslands (making grazing impalatable) and soil profiles (impact of potentially harmful spread of foreign material). There is no mention of the rehabilitation or rectification of harm caused to humans, the palatability of grasses and long-term soil damage. 	<p>Due to the small scale of disturbance, it is not anticipated that the prospecting operations will result in significant increased dust fall. Visual inspections will be conducted by the appointed Environmental Control Officer (ECO) and additional mitigation such as spraying of water on exposed surface will be conducted if increased dust generation is noted. Speed limits will be strictly enforced on farm roads.</p>	Appendix 5 – EMPr Section iv	
X	22 March 2020	<ul style="list-style-type: none"> The contamination of water courses, dams and soil will result in long-term and possibly irrevocable damage to farming operations. In the event of contamination, what are the procedures and penalties to be enforced? 	<p>A 100m buffer zone has been established around all water resources to prevent impacts as per the drill plan as indicated in Figure 14. No disturbance of water courses are anticipated.</p> <p>A hierarchy approach will be implemented to mitigate potential impacts, therefore the 100 meter buffers will be implemented to prevent any disturbance.</p> <p>It should be emphasised that the individual drill sites will cover approximately 300m² (0.03 ha or 15x20 meters.) The total area will cover 3.18 hectares with all the drill sites combined.</p> <p>Section 1.2.2 of the EMPr stipulates specific requirements/procedures for the management of hazardous substances, also in the case of spillages.</p>	Appendix 5 – EMPr Section iv of the BAR Figure 14	

				<p>The following mitigation has been included in the EMPr to prevent/minimise impacts on surface and groundwater, as well as users:</p> <ul style="list-style-type: none"> ▪ Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. ▪ Diesel storage areas to be bunded and regularly checked. ▪ Drip trays to be placed under vehicles susceptible of dripping oil. ▪ Spill kits to be available at drill sites. ▪ Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). ▪ Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. ▪ Diesel storage areas to be bunded and regularly checked. ▪ Drip trays to be placed under vehicles susceptible of dripping oil. ▪ Spill kits to be available at drill sites. ▪ Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). 	
X	22 March 2020	The closure costing provisions (pg. 200 of the PDF) provide a breakdown of the rehabilitation costs and how these were calculated. It is our experience that often rehabilitation is not carried out in a satisfactory manner. With this in mind, we require that there are financial penalties and financial compensation for landowners should rehabilitation not happen within a specified timeframe and to the state in which the area was originally found		<p>The rehabilitation process is systematic and includes maintenance and aftercare to ensure that the activities have been successfully implemented. The areas will be reseeded if required to ensure sustained vegetation growth and any other deficiencies will be rectified.</p>	Appendix 7 – final closure and rehabilitation plan
X	22 March 2020	Furthermore, the details of compensation in the event of loss of income and/or permanent damage to property and/or business activities should be stipulated. This should include the presentation of sufficient 3rd party liability insurance by the prospecting company to landowners.		<p>This comment is noted. The drilling operations will avoid cultivated land such as crops and orchards and any other farming infrastructure such as buildings. Where economic land use such as crops will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation.</p>	

			<p>4. Access</p> <p>The BAR states that “existing farm tracks and roads will be followed for entry and exit to all drill sites. Site locations will be determined to ensure short and easy access. All access on farms will be conducted in terms of a written agreement with the landowner. In instances where no access road is available to the site location, a single track will be chosen on the basis of least environmental impact on natural habitat considered the last option. Only these tracks will be followed and will not be deviated from” (pg. 13). Permission to deviate from existing farm tracks should be obtained from the landowner in writing.</p>	<p>Discussions regarding the use of farm roads will be conducted during the consultation process prior to the commencement of drilling.</p>	N/A
X	22 March 2020	<p>We support the statement that a written agreement must be entered into before farms can be accessed.</p>	<p>Noted. Consultation to be conducted accordingly.</p>		
X	22 March 2020	<p>The EMPr states that rehabilitation of access roads will be undertaken as part of decommissioning. Please could you confirm the specific rehabilitation measures to be implemented. We also request that roads are rehabilitated on a continual basis as required, and not just as part of decommissioning, as these roads are vital to farming operations and must be maintained throughout the 48-month drilling operations.</p>	<p>The rehabilitation of roads will only be conducted if additional roads are required for the prospecting activities. However, current tracks will be used as far as possible. This will entail ripping of the road, appropriate sloping according to surrounding topography and revegetation with plants dominant in the area. Maintenance and aftercare will also be conducted to ensure that rehabilitation activities have been implemented successfully.</p>	<p>Appendix 6 – final rehabilitation plan.</p>	
X	22 March 2020	<p>5. Safety and Security</p> <p>It is noted that drilling will be undertaken for a period of 48 months where contractors and drilling personnel will be allowed access to the site. This poses a significant security concern for the occupants of the land (specifically the vulnerable members of the community, such as women and children).</p>	<p>Reputable drilling contractors will be used and workers will be under strict supervision to prevent any negligence related to activities such as the closing of gates.</p> <p>The following mitigation measures have been included in the EMPr related to safety</p> <ul style="list-style-type: none"> • Drilling contractors will not be allowed moving outside of designated areas. • Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. • All personnel that have access to the property will be provided with access cards. • All personnel that have access to the property need to be made visible. • Drilling contractors to be housed off site. 	<p>Appendix 5 - EMPr</p>	

	X	22 March 2020	Given the high incidences of crime in the area, we do not believe that the safety and security mitigation measures proposed in the EMPr are adequate for ensuring the safety of the occupants of the site. In addition to the fencing proposed, we would like to request that security guards from a reputable service provider are posted at the drill sites or at key access points to ensure that only authorised personnel are allowed on site and to ensure that drilling contractors do not move outside designated areas.	This comment is noted and will be communicated to the applicant.	
	X	22 March 2020	<p>6. Conservation of Biodiversity and Water Courses</p> <p>A number of drill sites fall within water courses, or water course basins. We unequivocally object to these sites on the basis that harmful materials are used in the drilling process, and these harmful substances entering water courses pose a significant risk to human and animal life. Furthermore, contamination of watercourses poses significant long-term risk and damage to intensive agricultural practices like ours (dairy farming), potentially destroying the business in the process. These sites should be removed altogether, and no site should be situated within 500 meters of a watercourse or dam, or within a watercourse basin. The proposed 100 meters is wholly insufficient.</p>	<p>The 100 meter buffer zones have been developed according to best practices guidelines. Due to the small scale of disturbance and small volumes of hazardous substances that will be used, it is not anticipated that the proposed prospecting activities will impact on water courses. The EMPr contains sufficient mitigation to prevent or minimise impacts. The responsibility of the appointed ECO will be to ensure that the requirements of the EMPr are implemented.</p> <p>The drilling operations will focus, as far as possible, on areas that have been already disturbed by anthropogenic activities. Ridges (as stipulated in the EMPr) will be avoided. A mitigation has been added to the EMPr to limit disturbance in sensitive or densely vegetated areas and no vegetation clearance except for borehole access point in these sites. The seed mix used for rehabilitation must take into account the dominant plant species of the area.</p> <p>The drilling operations will focus, as far as possible, on areas that have been already disturbed by anthropogenic activities. Ridges (as stipulated in the EMPr) will be avoided. A mitigation has been added to the EMPr to limit disturbance in sensitive or densely vegetated areas and no vegetation clearance except for borehole access point in these sites. The seed mix used for rehabilitation must take into account the dominant plant species of the area.</p>	Appendix 5 - EMPr
	X	22 March 2020	<p>7. Disruption to Farming Operations</p> <p>The proposed drilling on our farms will significantly disrupt our operations by:</p> <ul style="list-style-type: none"> making areas of our farm unusable. <p>This is especially problematic in areas where intensive agriculture is practiced.</p>	<p>Areas where crop cultivation is conducted as well as residential units and other farming structures such as sheds will be avoided by the drilling operations. Appropriate buffers from the residential units and farming structures will be adhered to.</p> <p>Speeds limits (40km/h) on farms roads will be enforced.</p> <p>Where economic land use such as crops will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation.</p>	Appendix 5 - EMPr

		<ul style="list-style-type: none"> the spread of dust onto grasses makes them unpalatable to livestock. With the further impact of wind, this makes large areas of our farm unusable over the period and beyond. cutting of fences for access to drill sites. overuse of farm roads disruption to normal farm activity <p>As a result, those drill sites that fall within intensive farming areas (i.e. pastures / crop lands) should be moved. And, as stated previously, compensation should be paid where the impact of drilling leads to loss of productivity and income.</p>		
X	22 March 2020	<p>8. Other Points of Objection</p> <ul style="list-style-type: none"> certain drilling sites are situated too close to family homes. No drilling should take place within 500 meters of a house (100m insufficient) 	The 100 meter buffer zones have been developed according to best practices guidelines. Due to the small scale of disturbance and small volumes of hazardous substances that will be used, it is not anticipated that the proposed prospecting activities will impact on water courses. The EMPr contains sufficient mitigation to prevent or minimise impacts. The responsibility of the appointed ECO will be to ensure that the requirements of the EMPr are implemented.	
X	22 March 2020	<ul style="list-style-type: none"> working hours should be limited to normal business hours of 9am - 5pm. The document currently states (daylight hours). 	This comment is noted and will be communicated to the applicant.	
X	22 March 2020	<ul style="list-style-type: none"> there is no mention of recourse / compensation with regards to theft, damage to property, sickness/disease of humans and livestock, long-term negative impact on farming activities. This should be detailed and covered by an active insurance policy. 	This comment is noted and will be communicated to the applicant.	
X	22 March 2020	In conclusion, we as Green H Ranches wholeheartedly object to the prospecting for coal on our farms. Agriculture, especially intensive agriculture such as dairy farming (which we do), is highly environmentally sensitive. The short-	This comment is noted. Please refer to the above response. Due to the small scale of the operations and the implementation of the proposed mitigation measures, it is not anticipated that the project will pose any significant impacts on the current land use or on the environment.	

			term disruption and long-term risks posed by drilling activities, including the use of highly toxic chemicals, poses significant risk to our business, the hundreds of people who live on our farms, and the ecological environment.		
Allan Watson	X	25 February 2020	<ul style="list-style-type: none"> • 1) Increased stocktheft due to the influx of strangers into the area • 2) Farm security due to the above • 3) Fires from drilling operations and general staff negligence • 4) General security with gates being left open and generally a lack of control • 5) Inconvenience of having to accommodate drilling crews • Degradation of grazing due to increased vehicular traffic 	<ul style="list-style-type: none"> • The Environmental Management Programme (EMPr) developed for the proposed prospecting activities that were provided to the Interested and or Affected Parties and attached to this mail contains mitigation measures to avoid or minimize potential environmental impacts. • Reputable drilling contractors with ample experience will be used and workers will be under strict supervision to prevent any negligence related to activities such as the closing of gates. • No fires will be allowed at the site as stated in the EMPr. • No workers will be allowed to stay overnight at the drilling locations. • Existing roads will be used as far as possible to avoid impacts on vegetation cover. • Land owners will be consulted with regards to the location of drilling sites that will affect current land use. • Measures have been included in the EMPr to apply good house keeping practices and the sites will be cleaned/remediated as part of the rehabilitation of the site. • The sites will be rehabilitated and revegetated to allow for the continuation of activities such as grazing. 	Appendix 5 – EMPr Section iv
THE SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED. Dumisane Nkabinde	X	-	No comments received	No comments received	
THE SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED (Mr Mlambob)					
KWANTABAMNY AMA COMMUNITY TRUST- TRUSTEES					
BOYABENYATHI FAMILY TRUST					

ARNUT HILL PTY LTD					
DAVIES NORMAN ARRAS (Elnor Davies)					
TUGELA FARMS CC (Bryan Drew/Jane Alice Drew)					
STRACHAN JOHANNES JACOBUS					
R S A					
GREEN ALAN JEREMY (Carol)					
Lawful occupier/s of the land		-	-	-	
	X	-	No comments received	No comments received	-
Landowners or lawful occupiers on adjacent properties	X				
STRACHAN JOHANNES JACOBUS					
JOHANNES STRACHAN TRUST- TRUSTEES	X	-	No comments received	No comments received	-
SCHOEMAN PETRUS JOHANNES (Peter)					
ARNUT HILL PTY LTD					

GREENDALE AGRICULTURAL PROPERTY PROPRIETARY LIMITE (G Green)					
DAVIES NORMAN ARRAS					
WATSON ALLAN GORDON					
NATIONAL GOVERNMENT OF THE REPUBLIC OF SOUTH AFRICA					
NDLELA TEMBA SOLOMON (KUMALO WILFRED CYPRIAN TOSI)					
LAW GAVIN PINKNEY (Sonja Law)					
BLOSWETEA PROPRIETARY LIMITED (SUSAN MARY WATSON)					
GOLDSCHAGG HERMAN ALFRED					
NTOKOZWENI DEVELOPERS CC					
PHEKAPHANSI TRADING ENTERPRISE PROPRIETARY LIMITED (Zwelakhei Mchunu)					
RIVER WEST TRADING PTY LTD					

BLOSWETEA PROPRIETARY LIMITED (Logan)					
Phillip Mkhasebe					
COPELAND HEATHER DAWN					
Organs of state (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, DWA e					
Transnet	-	-	-	-	-
Eskom	-	-	-	-	-
Communities					
-	-	-	-	-	-
Dept. Land Affairs					
Jan Venter	X				
Traditional Leaders					
-	-	-	-	-	-
Dept. Environmental Affairs					
Department of Economic Development, Tourism and	X	-	-	-	-

Environmental Affairs					
A Gamede	X	-	-	-	-
Other Competent Authorities affected					
Alfred Duma Local Municipality	X				
Uthukela District Municipality	X				
Department of Water and Sanitation (KZN)	X				
AMAFA KZN Heritage	X				
Land Restitution Commission	X				
KZN Conservancies	X				
Head of Department Kwazulu Natal?	X				
Ezemvelo KZN Wildlife	X				
KZN Department of Agriculture and Environmental Affairs	X				
DAEARD	X				
Department of Human Settlement	X				

Department of Cooperative Governance and Traditional Affairs	X				
Department of Rural Development & Land Reform	X				
Department of Agriculture, Forestry and Fisheries (DAFF)	X	24 February 2019	DRAFT BASIC ASSESSMENT REPORT (BAR) AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPr) FOR PROSPECTING RIGHT APPLICATION ILAHLE LADYSMITH This letter serves as a notice of receipt for the above document received on the 21 February 2020. Kindly note that the document will be processed within 30 days from the date of receipt, provided that all requested information is submitted to the department timeously. Should any further information be required, please do not hesitate to contact this office.	Noted	N/A
Department of Agriculture, Forestry and Fisheries (DAFF)	X	24 February 2020	With reference to the above mentioned application, the natural vegetation within/around the site comprised of grassland and patches of woodlands, however, the natural state of the site has been impacted by several anthropogenic activities. The woody vegetation present of site does include some indigenous tree species but they do not constitute a natural forest nor are they protected in terms of the NFA. Therefore the Department has no objections towards the proposed activities, however, recommend the following:	This comment is noted	N/A
Department of Agriculture, Forestry and Fisheries (DAFF)	X	14 July 2020	a) All disturbed areas that are no longer in use should be rehabilitated using 100% indigenous vegetation (inclusive of trees) which is endemic to the area.	The EMPr and the final rehabilitation plan makes provision for the use of a seed mix that reflects the dominant vegetation in the specific area.	Appendix 6
	X		b) Rehabilitation should be conducted in a progressive manner (i.e. once mining in an area has been completed the area must be	Rehabilitation will be conducted in a progressive manner as stipulated in the final rehabilitation and closure plan, no more than six boreholes will be disturbed at any given time during the life of the prospecting activities.	Appendix 6

			rehabilitated). The rehabilitation of the area with indigenous vegetation must coincide with suitable weather events.		
	X		c) Indigenous vegetation must be rescued as much as possible and all transplantable trees/plants ought to be transplanted to a suitable location. The vegetation rescue including transplanting during site establishment must be re-established under the guidance of a qualified personnel.	This comment is noted. Protected tree species will not be removed without the appropriate permits. The activities will focus on areas already disturbed and disturbance will be minimised in sensitive areas.	EMPr
	X		d) No indigenous vegetation should be cleared for access routes instead existing farm roads/tracks should be utilized.	The EMPr makes provision for the use of existing farm roads.	
	X		e) Only the highly disturbed areas which require minimal to no vegetation disturbance may be used for site camps; offices i.e.	Disturbance will be limited to the drill sites, employees will not stay on the site, but rather in town.	
-	-	-			-
<u>INTERESTED PARTIES</u>					
Jennifer de Villiers			Hi Trevor, Could you please provide an electronic copy of the BAR? I would also like to register as an I&AP. Thank you, Jennifer	A copy of the documents has been provided	Appendix 2.6 Comments and response

iii. **The Environmental attributes associated with the alternatives.**

(1) Baseline Environment

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

Physical Environment

General Location:

The Prospecting Right application has been submitted to prospect for coal, limestone and pseudocoal in respect to the following properties:

- Remainder and the Remainder of Portion 1 of the Farm Marias Heuvel No. 2947-GS.
- All Portions of the Farm Marias Heuvel No. 13 247-GS.
- A Portion of the Remainder of Portion 2, A Portion of Portion 3 and A Portion of Portion 8 of the Farm Krantz Kloof No. 1245-GS
- Portions 2, 3, 7, 11, 21, 22, 25, 26 and the Remainder of Portion 4 of the Farm Smalhoek No. 1282- GS.
- Portions 3, 4 and the Remainder of the Farm Weston No. 2365-GS.
- A Portion of the Farm 18 458-GS, A Portion of the Remainder and A Portion of Portion 2 of the Farm Voorslag No. 8338-GS.
- Farm Recompense No. 4790- GS.
- Portions 1 and 6 of the Farm Arcadia 2179-GS.
- Portions 1, 10, 16, 29 and 30 of the Farm Roodepoort No. 1119

The prospecting right area covers approximately 6 366 ha in extent. The proposed Prospecting Right is located within the Alfred Duma Local Municipality and is located ~6 km west of Ladysmith in KwaZulu-Natal.

Climate

The project area is set on the grassland and savannah biomes of Ladysmith, at an altitude of approximately 1073 metres above sea level. The project area falls in a summer rainfall region with an expected average rainfall of 589mm.. Thunderstorms and showers constitute the majority of the summer rainfall. The yearly average low in terms of temperature is 14.7°C. The yearly average high in terms of temperature is 26.4°C. Refer to Figure 4 below.

As illustrated in Figure 4, precipitation occurs as showers and thunderstorms and falls mainly from September to March with the maximum precipitation occurring in December, and January. Rainstorms are often accompanied by severe lightning, strong winds and hail. The winter months are mostly dry, but the occasional winter shower does happen from time to time.

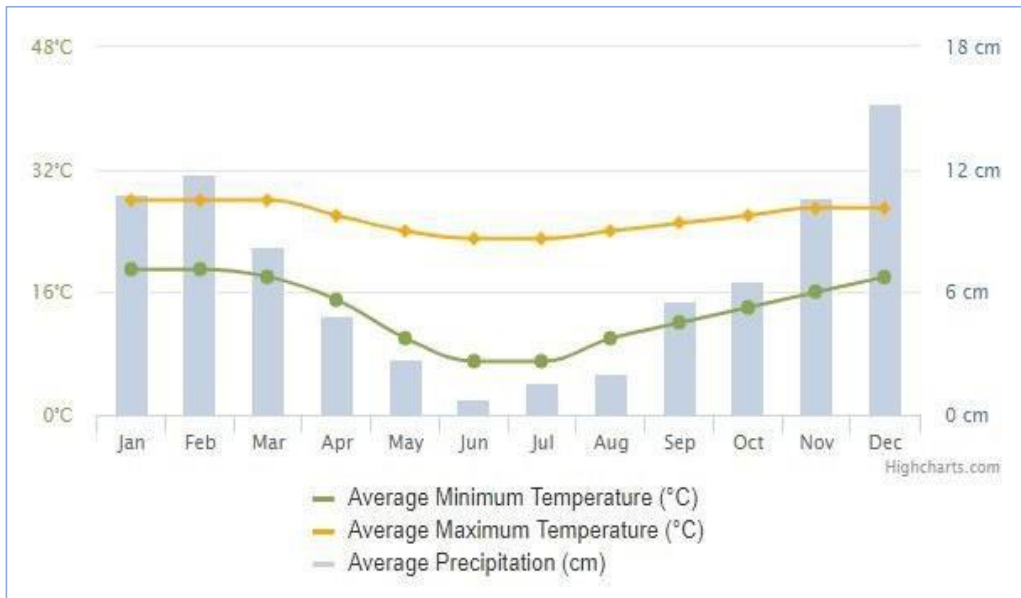


Figure 4: Average monthly Rainfall for the Ladysmith area.

Maximum daily temperatures occur during January. The minimum daily temperatures occur in June and July.

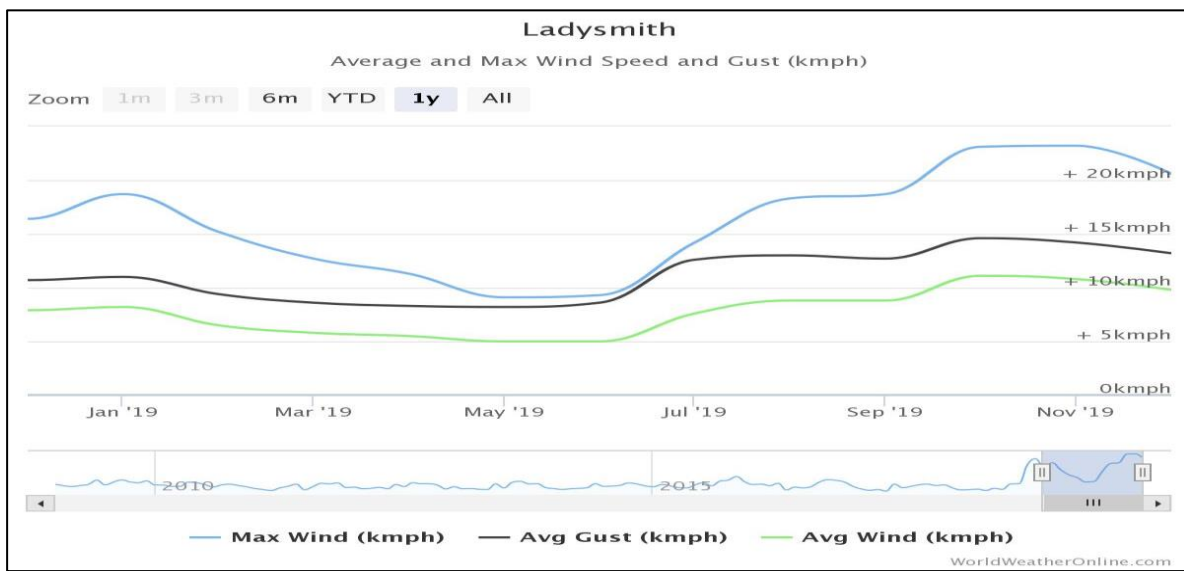


Figure 5: Wind speed and gusts graphs for Ladysmith 2019

The wind speeds fluctuate from season to season with the strongest winds during the months of October to January. **Figure 5** represents the maximum and average wind speeds for the Ladysmith area for 2019.

Geology:

The prospecting area falls within the south western part of the Klip Rivier Coalfield (see **Figure 6**). Out of the five known coal seams there are only two coal seams in this coalfield that are commercially exploited. The one being the bottom (or No. 2 seam) seam and the other the top (or No. 3 seam). These coal seams occur stratigraphically about 120 m beneath the base of the Volksrust formation and 200 m above the Pietermaritzburg formation. The top seam is usually of lower quality coal than the bottom coal seam.

Igneous Dolerite intrusions from the Jurassic period have intruded the sedimentary rock formations around the project area. These Dolerite intrusions formed what we know today as the Karoo Dolerite suites with typical Dolerite dykes and sills associated. The colluvium Masotcheni Formation erodes very easily and forms deep dendritic gullies in the KwaZulu-Natal landscape. In the province of Kwazulu-Natal, the Klip Rivier Coalfield is associated with the main Karoo Basin which formed between the Palaeozoic and Mesozoic periods.

The northern part of the geological map in **Figure 6** consists mainly of the Volksrust formation that is a subgroup of the Ecca group, a group of the Karoo Supergroup. The unit consist mainly of mudstones and siltstones with a dark green-grey colour and concretions composed out of carbonates and phosphates. The width of the Volksrust formation ranges from 150m to 250m. The Volksrust formation has an increased rock coarseness trend from the bottom to the top of the unit. The coal deposits are interbedded with the mudstone and siltstone in some areas. The formation of the Volksrust Formation was a result of shallow to deep water basinal conditions. The southern section of the geological map in Figure 6 consists almost entirely out of the Adelaide subgroup. The Adelaide subgroup is the lower part of the Beaufort group. The Adelaide subgroup contains mainly mudstones, sandstones and siltstones. The Adelaide subgroup can be divided into two formations namely the Teekloof and Abrahamskraal formations. The total thickness of the Adelaide group is 2800m.

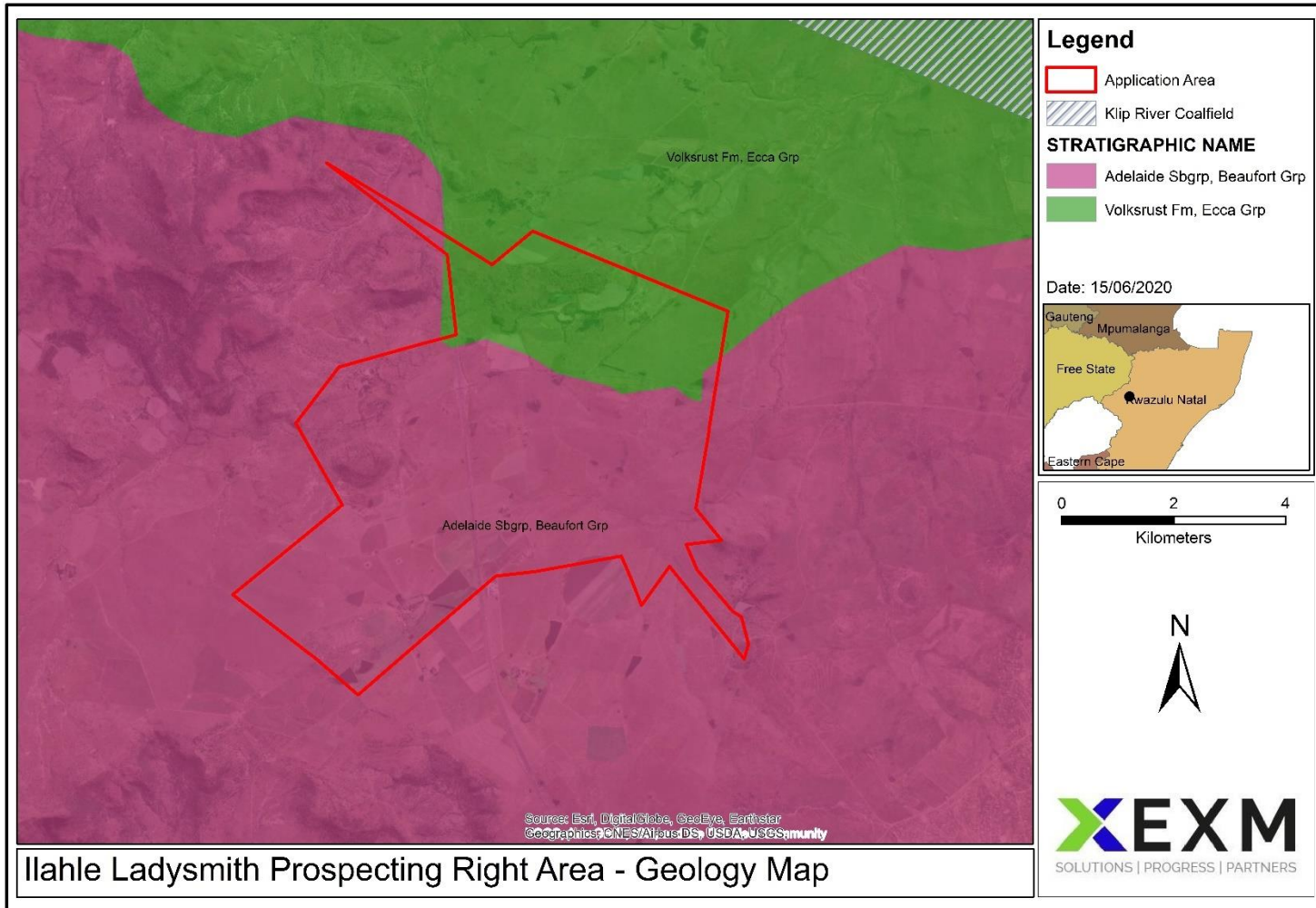


Figure 6: Geology Map

Topography

The study area is mountainous on the south eastern side with flatter areas towards the north eastern section with natural surface topography ranging from 1038 masl in the plains to 1202 masl on the outcrops and mountain ranges. The site drains towards the north north-eastern section towards the Klipriver situated just outside the PR area boundary. The study area has an average slope of 2,8%-4%. The Topography of the study area, shown in **Figure 7**, is typical of a Drakensburg area, with close contouring around the mountain valleys and more flat contouring at the valley bottoms.



Plate 1 View towards south-western section

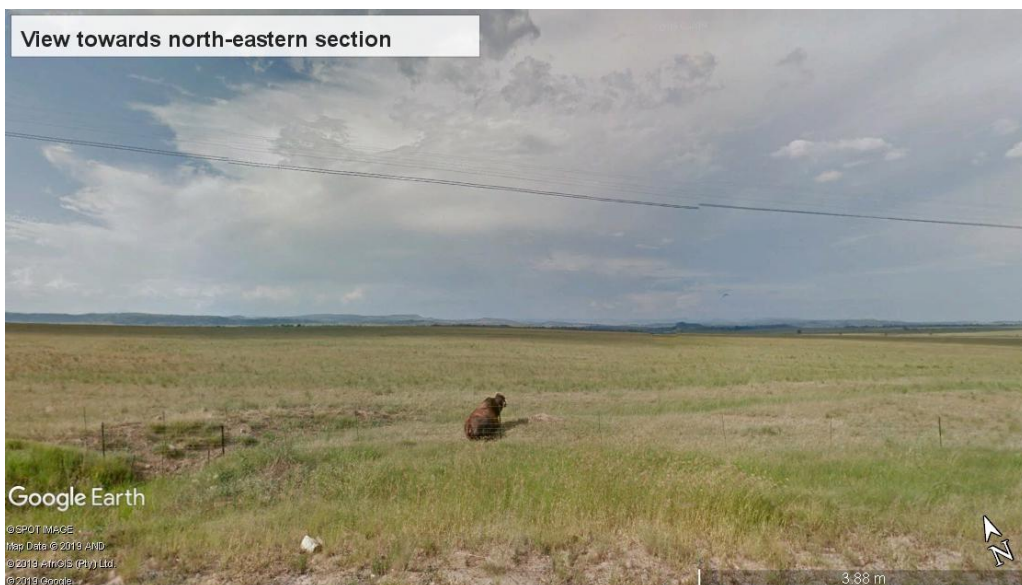


Plate 2 View towards north-eastern section

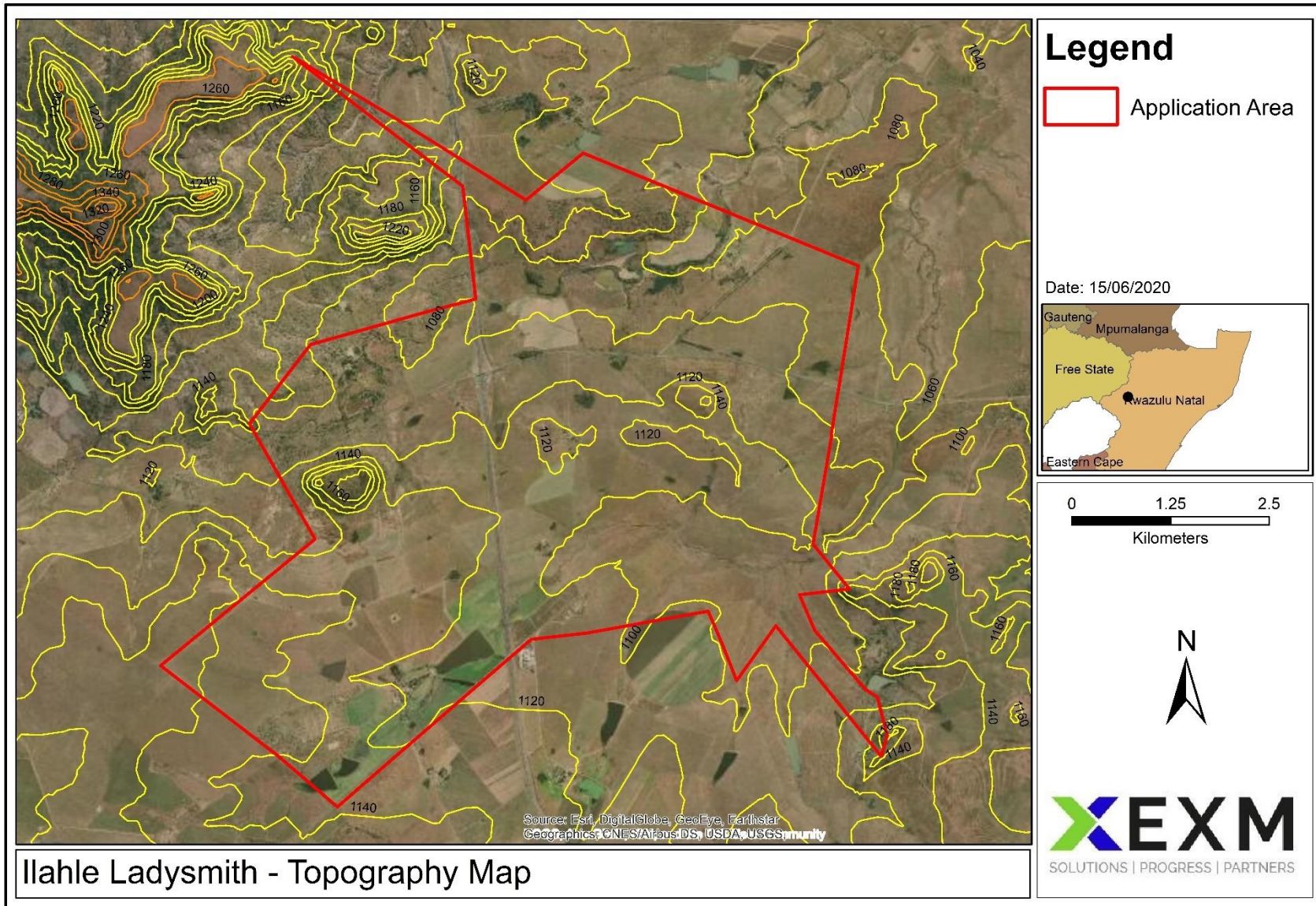


Figure 7: Topography Map

Land use:

Most of the study area consists of grassland/natural veld of which large sections are used for grazing purposes and commercial crop cultivation is conducted in various sections of the study area. Mountains and valleys are relatively free from anthropogenic disturbances. The R616 regional road and N3 national route transects the study area. The R616 connects Ladysmith 6km south west of the site with Bergville 27 north east of the site and the N3 transverses towards Escourt 47km north west of the site. (refer to **Figure 8**).

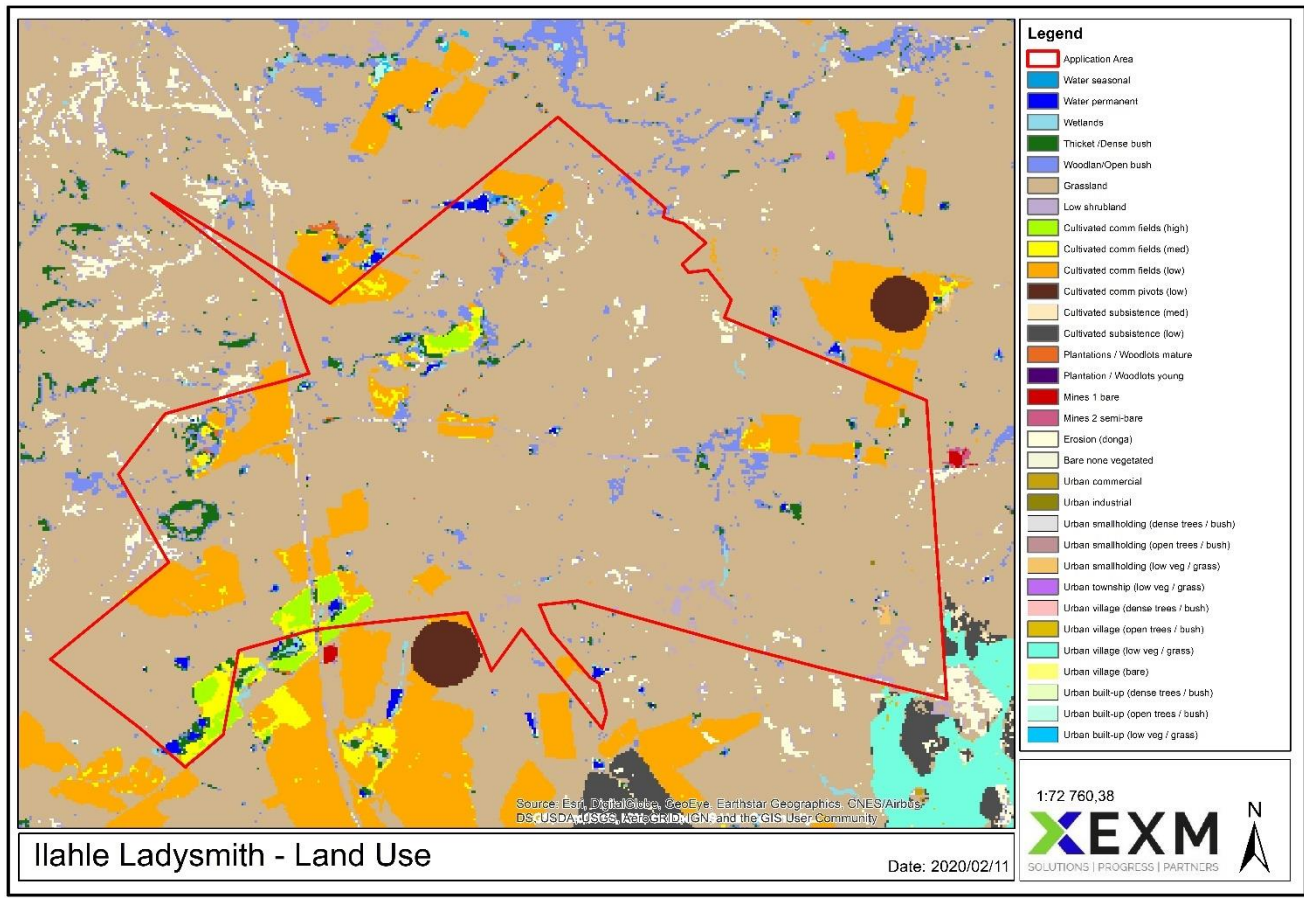


Figure 8: Land Use Map

Groundwater

The study area has a number of minor aquifers with some sole source aquifers associated with the dolerite dyke intrusions in the study area. There are also a number of aquitards or non-aquifers associated with the Ecca Group shales and mudstones as well as the Dwyka Group diamictite. The geohydrology on which the study area is located is characterised by predominantly fractured or secondary hard rock aquifers, where available. Although it is not verified, it is anticipated that locally developed alluvial and weathered aquifers would occur close to the streams and rivers. In general, the development potential of these aquifers (excluding dolomite) is low, but able to supply the basic water needs of rural settlements and farms (DWA, 2010).

Wetlands

According to the National Freshwater Ecosystem Priority Areas (NFEPA) database, several wetlands are situated within the project area as illustrated in the figure below. The majority of the wetlands are classified as Valley Floor wetland systems.

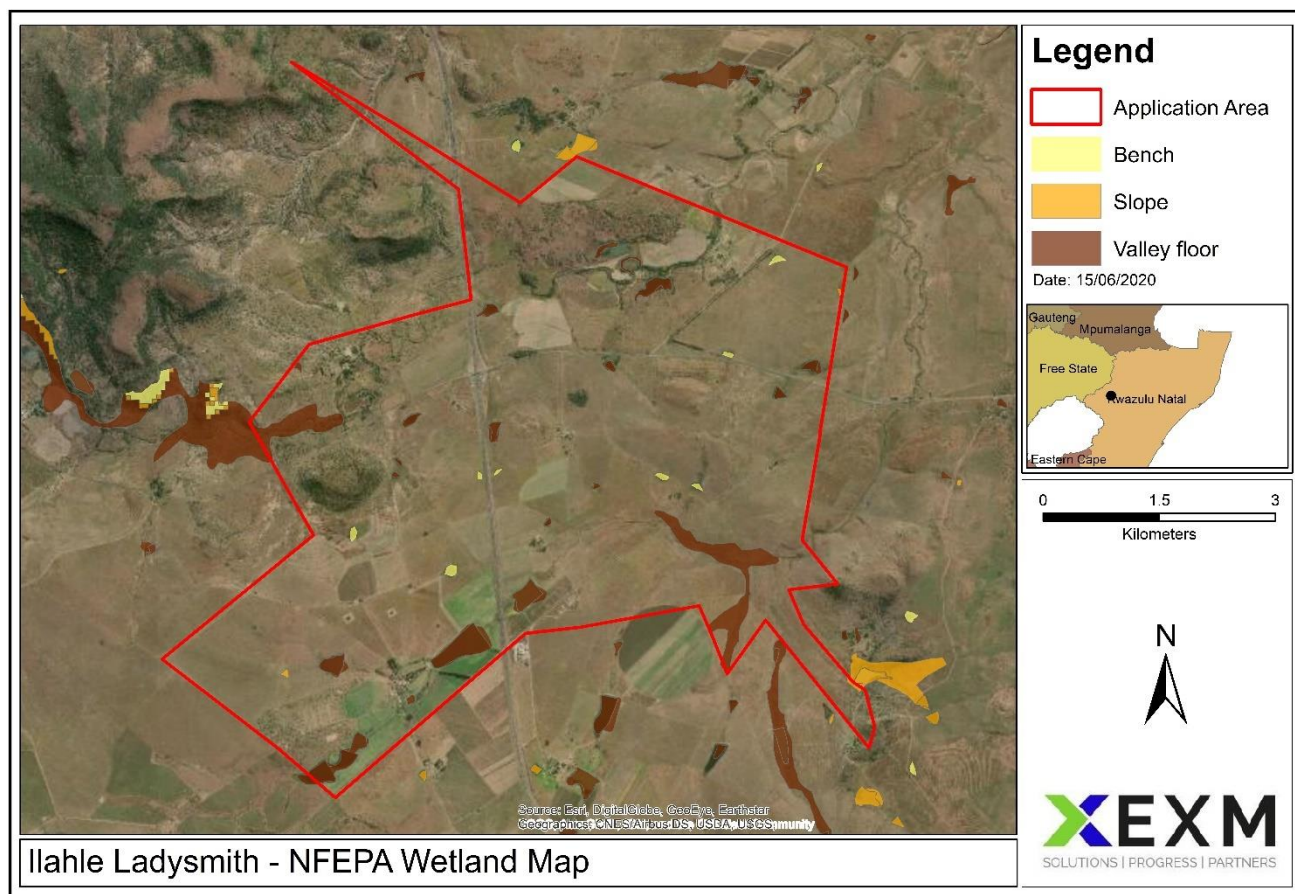


Figure 9: NFEPA wetlands

Surface water:

The prospecting area is situated in quaternary catchment V12F which forms part of the Thukela River water management area. The surface area of the Thukela River catchment is approximately 30 000 km² in extent. Due to the mountainous nature of the Thukela WMA and its proximity to the Indian Ocean, the rainfall is high, ranging from over 1 500 mm per annum in the mountains to about 650 mm per annum in the central parts. Consequently, there is substantial runoff from the Thukela catchment, with the Mean Annual Runoff estimated at 3 799 million m³/a.

Non-perennial streams drain in the study area flow towards the Klip River which is situated approximately 3 km north of the study area. The Klip River drains the western and southern portion of the municipality and flows into the Spioenskop dam approximately 9km north east of the site. The confluence of the Klip and Tugela Rivers is approximately 20 km southeast of Ladysmith. Small dams that are used for agricultural purposes are located in the study area. Refer to **Figure 10** for a map of the surface water resources on site. The catchment is under pressure due to poorly operated municipal sewage treatment works, forestry and overgrazing.

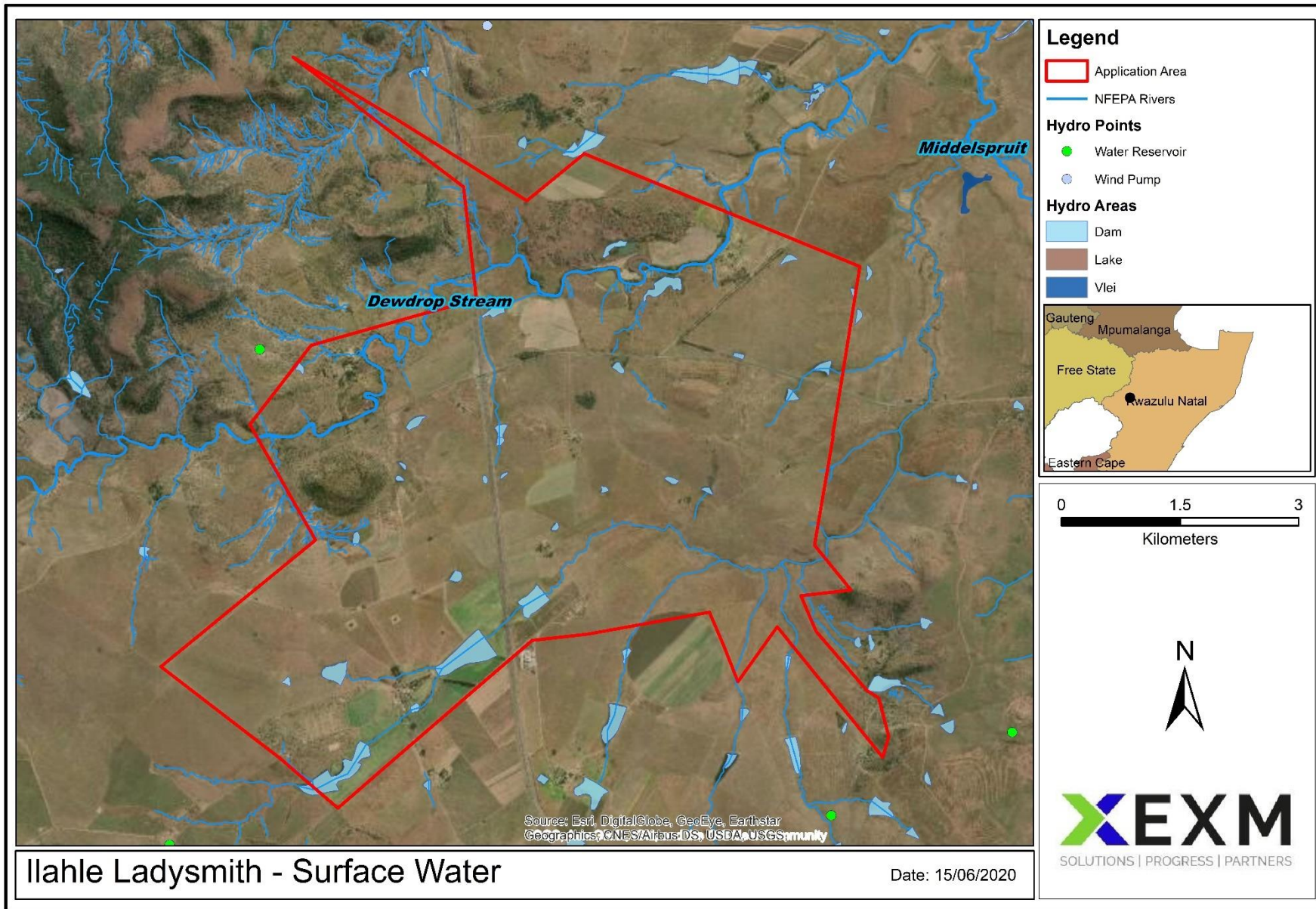


Figure 10: Surface Water Resources

Biodiversity

- Vegetation unit

As indicated in **Figure 11** the project area is situated in the KwaZulu Natal Highland Thornveld vegetation unit which occurs on both dry valleys and moist upland in a series of several patches in the central-northern regions of KwaZulu-Natal. The most extensive area is found in the region from Ladysmith, Winterton, Estcourt and Colenso, between Mooi River and Greytown, between Pomeroy and Babanago, and further north in a triangle between Vryheid, Paulpietersburg and Louwsburg as well as a large patch around Newcastle (Mucina and Rutherford, 2006).

The KwaZulu Natal Highland Thornveld is classified as Least threatened with a national conservation target of 23%. Only about 2% is statutorily conserved in the Spioenkop, Weenen, Ntinini, Wagendrift, Moor Park and Tugela Drift Nature Reserves. More than 16% has been transformed for cultivation and by urban sprawl as well as by building of dams (Craigie Burn, Spioenkop, Wagendrift and Windsor). Alien plant species such as *Opuntia*, *Eucalyptus*, *Populus*, *Acacia* and *Melia* are becoming invasive in places, but probably the greatest threat to the remaining natural areas of this unit is bush encroachment (Mucina and Rutherford, 2006).

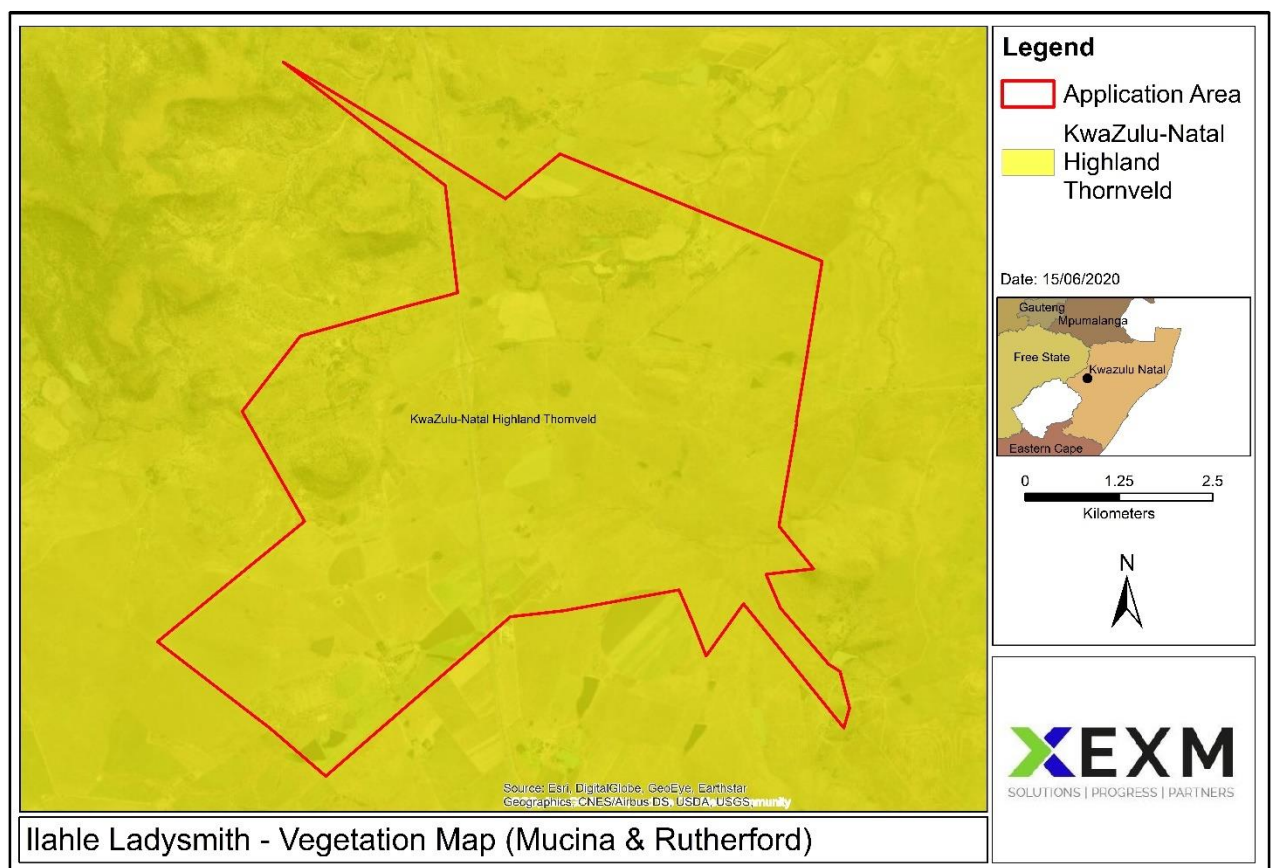


Figure 11: Vegetation map

- Sensitive Biodiversity

The Spioenskop dam nature reserve is situated 7 km south west of the prospecting area. According to the Kwa-Zulu Natal Conservation Plan, some sections within the project area are classified as Critical Biodiversity Areas (CBA). A small section on the southern side is classified as an Irreplaceable CBA

and the remainder of the CBAs are optimal, as per the definitions below:

Irreplaceable CBA's: Areas considered critical for meeting biodiversity targets and thresholds, and which are required to ensure the persistence of viable populations of species and the functionality of ecosystems.

Optimal CBA's: Areas that represent an optimised solution to meet the required biodiversity conservation targets while avoiding areas where the risk of biodiversity loss is high Category driven primarily by process but is also informed by expert input.

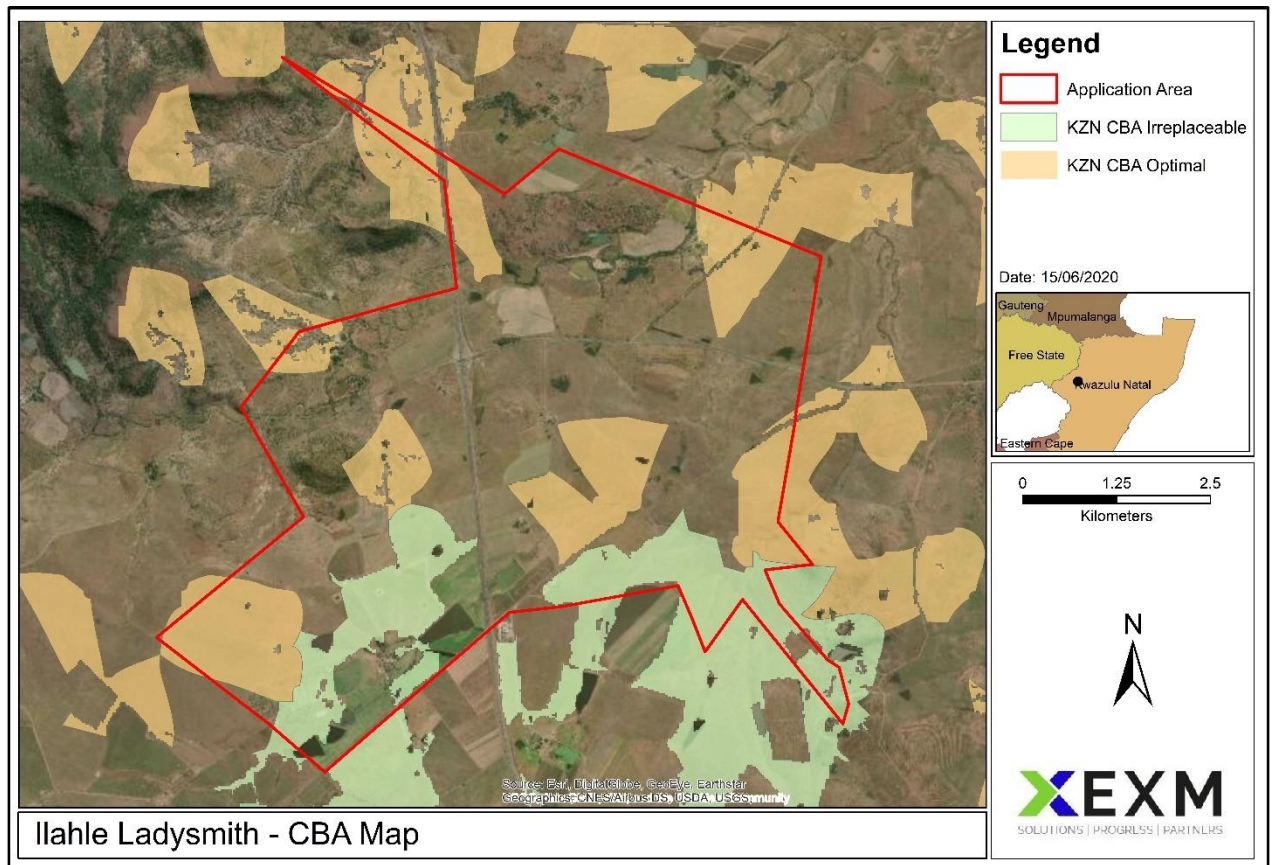


Figure 12: Biodiversity Conservation Areas

Air quality & noise:

The majority of the site is in a rural location and should result in a good air quality, with dust during winter from dirt roads and agricultural activities being the greatest impact. The predominant noise in the area is generated from sources such as the main roads, the N3 and N11.

Sites of archaeological and cultural interest:

It is possible that some graves and graveyards occur in the general area. It is likely that some historical buildings may occur in the area from the site survey. 50m buffers must be established around the sites

Socio-Economic Status

The economy of uThukela District Municipality is highly geographically dispersed and the majority of

economic activity occurs in the main urban centres, such as Ladysmith and Escourt. The main economic activity is classified as manufacturing in Ladysmith and wealthy commercial farms in Okhahlamba Local Municipality. According to the uThukela DM Spatial Economic Overview, the key economic development nodes in the District are Greater Ladysmith (main node); Escourt; Bergville; and Winterton. These are all urban centres in the District Municipality, thus there is an urban bias in terms of economic activity.

The uThukela DM IDP reports that 65.7 percent of the district municipality's population were living below the minimum standards in 2010. This is compared to 49.6% in KwaZulu-Natal for the same year. When comparing the local municipalities, Okhahlamba LM has the highest poverty rate of 78.1 percent in 2010 followed by Imbabazane LM with a poverty rate of 73.6 percent. None of the municipalities have a poverty rate that is lower than KZN. Emnambithi-Ladysmith LM has the lowest level of poverty in the area at 56.4 percent.

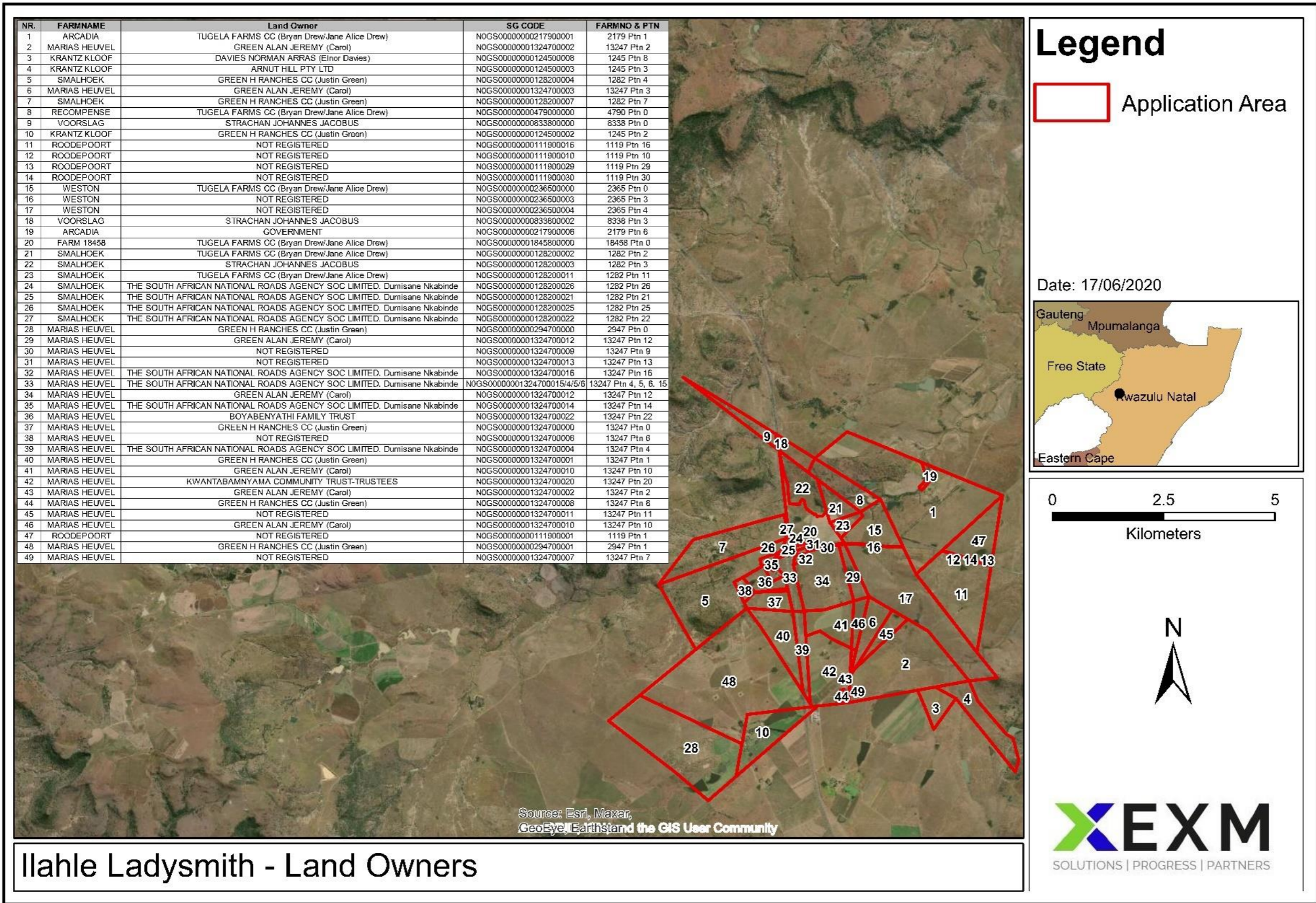
The district age and gender profile are 47% male and 53% female. The largest population group are youth between 0 – 14 years and 15 – 34 years old who account for 37 percent and 36 percent of the population respectively. Thus 73 percent of the population is under 35 years indicating a youth dependent generation.

Land Tenure

The proposed prospecting area covers numerous properties within the Uthukela Magisterial District Ladysmith within the UThukela District Municipality of the KwaZulu-Natal Province of South Africa. The proposed prospecting rights area covers a surface area of approximately 6 366 ha. A layout plan of the properties is provided in **Figure 13**. Table 1 describes the properties that are included in the prospecting right area.

Table 1: Property ownership and summary of infrastructure

Area of title (ha)	Properties covered	Summary of infrastructure
6 366	<ul style="list-style-type: none"> • Remainder and the Remainder of Portion 1 of the Farm Marias Heuvel No. 2947-GS. • Whole Area (all Portions) of the Farm Marias Heuvel No. 13 247-GS. • A Portion of the Remainder of Portion 2, A Portion of Portion 3 and A Portion of Portion 8 of the Farm Krantz Kloof No. 1245-GS • Portions 2, 3, 7, 11, 21, 22, 25, 26 and the Remainder of Portion 4 of the Farm Smalhoek No. 1282- GS. • Portions 3, 4 and the Remainder of the Farm Weston No. 2365-GS. • A Portion of the Farm 18 458-GS, A Portion of the Remainder and A Portion of Portion 2 of the Farm Voorslag No. 8338-GS. • Whole Area of the Farm Recompense No. 4790- GS. • Portions 1 and 6 of the Farm Arcadia 2179-GS. • Portions 1, 10, 16, 29 and 30 of the Farm Roodepoort No. 1119 	No prospecting related infrastructure has been established.



Ilahle Ladysmith - Land Owners

Figure 13: Land Tenure Map

(b) Description of the current land uses.

Most of the study area consists of grassland/natural veld of which large sections are used for grazing purposes and commercial crop cultivation is conducted in various sections of the study area. Mountains and valleys are relatively free from anthropogenic disturbances. The R616 regional road and N3 national route transect the study area. The R616 connects Ladysmith 6km south west of the site with Bergville 27 north east of the site and the N3 transverses towards Escourt, 47km north west of the site. The Spioenskop nature reserve is situated 7km south west of the prospecting area.

(c) Description of specific environmental features and infrastructure on the site.

According to relevant biodiversity databases, no endangered ecosystems or protected areas occur within the boundaries of the site. A small section of the site is classified as an irreplaceable critical biodiversity area, but the drilling sites will be placed to avoid this area. The main environmental features would be those associated with the surface water features, including dams, drainage lines and wetlands. Prospecting sites will be located to avoid wetlands, dams and associated buffer zones. If there is a need to conduct activities in any of these areas, then the necessary authorisations must be obtained prior to undertaking such activities.. National roads (N3 and N11) and regional roads (R616) cross the study area.

(d) Environmental and current land use map.

Please refer to Environmental and Land Use Maps (Figures 8-12)

iv. Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Topography	Change in natural topography of the site.	Construction	2	3	2,5	2	2,25	0,8	1,8	<ul style="list-style-type: none"> Stockpile soils removed for rehabilitation. Rehabilitate sites to original landform. 	0,6	1,08
Geology	Creation of conduits between geological strata.	Operations	1	4	2,5	3	2,75	0,6	1,65	<ul style="list-style-type: none"> Boreholes to be sealed with concrete. 	0,4	0,66
Soils	Potential loss of topsoil.	Operations	2	3	2,5	2	2,25	0,6	1,35	<ul style="list-style-type: none"> Keep the footprint of disturbance as small as practicably possible. Vegetation to be left in place to protect soils where possible. Where vegetation clearance cannot be avoided, storm water management measures to be put in place if there is a risk of soil erosion. Erosion protection where cut and fill and levelling of the drill site occurred. 	0,6	0,81
	Potential loss of soil resource.	Construction & Operation	3	3	3	2	2,5	0,6	1,5	<ul style="list-style-type: none"> Utilise existing access roads as far as possible. Keep the footprint of disturbance as small as practicably 	0,6	0,9

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										possible. Access roads to follow slope contours where possible.		
	Risk of soil contamination.	Construction , Operation and Closure	3	3	3	2	2,5	0,8	2	<ul style="list-style-type: none"> Vegetation to be left in place at the sides of the road to protect the soils. Impermeable liners or surfaces to be provided in areas where hydrocarbons are managed Diesel storage areas to be bunded and regularly checked. Drip trays to be used when any vehicle maintenance is undertaken. Spill kits to be available at drill sites. Contaminated soil to be remediated in situ. 	0,6	1,2
Surface water resources	Contamination of surface water.	Construction , Operation and Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										plastic sheeting) and earth/sandbag walls.		
	Increase in sediment loads as a result of erosion and heavy rainfall.	Construction , Operation and Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> Implement measures for soil erosion control in accordance with risk assessment. Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. 	0,6	1,44
	General and human waste.	Construction , Operation and Closure	2	2	2	3	2,5	0,6	1,5	<ul style="list-style-type: none"> Contractors may only use designated toilets and waste disposal facilities. Separate, marked receptacles are to be provided for the storage of hazardous and general wastes at the waste generation points. Littering is not to be permitted. Measures for waste avoidance, minimisation, reuse and recycling must be implemented. Spills will be cleaned up appropriately. The ECO must ensure 	0,4	0,6

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>that spills are cleaned as soon as practicable and evidence of clean up measures must be maintained.</p> <ul style="list-style-type: none"> All items that have come into contact with any hazardous chemical substance (including fuels/oils/greases/laboratory chemicals, sludge) are to be disposed as hazardous waste. All waste are to be disposed of as general waste 		
	Disturbance of surface water resources.	Construction	4	4	4	3	3,5	0,8	2,8	<ul style="list-style-type: none"> Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. Keep the footprint of disturbance as small as practicably possible 	0,6	1,68

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Hydrogeology (Groundwater)	Seepage of fuels, oils and lubricants.	Construction, Operation and Closure	2	4	3	3	3	0,6	1,8	<ul style="list-style-type: none"> Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. 	0,6	1,08
	Cross contamination of aquifers due to borehole construction.	Operation & Closure	2	4	3	3	3	0,4	1,2	<ul style="list-style-type: none"> Boreholes that will not be used again will be backfilled with cement and sealed. Mitigation will entail the use of biodegradable or eco friendly drilling liquid. Alternatively, a drilling sock can also 	0,4	0,48

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>be used to soak up any contamination remaining after drilling operations have been completed.</p> <ul style="list-style-type: none"> • Purging of the borehole upon completion or to seal the borehole to prevent further use. The borehole can also be sealed to prevent use of the water for potable purposes. 		
Noise	Increase in ambient noise levels. Disturbance to people and animals.	Construction, Operation and Closure	3	4	3,5	3	3,25	0,8	2,6	<ul style="list-style-type: none"> • Avoid travelling past residences. Speed limit of 40km/h will be enforced • Liaise with landowner on areas sensitive to noise. • Provide a buffer of 100m from households. • Drilling to take place during daylight hours. • Borehole site and access route selection to minimize impacts on noise receptors 	0,6	1,56

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Air Quality	Release of gaseous emissions.	Construction , Operation and Closure	2	4	3	3	3	0,4	1,2	<ul style="list-style-type: none"> No unnecessary revving of vehicles should take place. No vehicle must stand idling when not in use. 	0,4	0,48
	Dust fallout and fine particular matter emissions.	Construction , Operation and Closure	2	4	3	3	3	0,6	1,8	<ul style="list-style-type: none"> Restrict travelling speed of vehicles to reduce vehicle entrainment of dust. Visual inspections will be conducted by the appointed Environmental Control Officer (ECO) and additional mitigation such as spraying of water on exposed surface will be conducted if increased dust generation is noted. 	0,6	1,08
Land Use and Land Capability	Intrusion due to drilling and prospecting activities in an area where agricultural uses are prominent.	Construction & Operation	3	4	3,5	3	3,25	0,8	2,6	<ul style="list-style-type: none"> Drilling sites must be selected to minimize disturbance of current land use. Relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling. 	0,4	1,04
	Reduction in land capability.	Construction	3	4	3,5	3	3,25	0,6	1,95		0,6	1,17

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> Rehabilitation of drill sites and access roads. 		
Fauna, Flora and Ecology	Removal/ damage of natural vegetation due to fires and	Construction	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> No-go areas to be identified. Environmental awareness training of all employees responsible for drilling. Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. No activities to be conducted within the 100m buffer zones around wetlands No activities to be conducted within the irreplaceable critical biodiversity area Site selection aimed at minimising disturbance to natural vegetation.No smoking at the drilling sites. Code of conduct to include measures for the prevention of fires. Emergency equipment and 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>procedures for fire fighting to be in place.</p> <ul style="list-style-type: none"> • Adhere to emergency procedures. • Limit disturbance in sensitive or densely vegetated areas and no vegetation clearance except for borehole access point in these sites. • The seed mix used for rehabilitation must take into account the dominant plant species of the area. 		
	Establishment of drilling sites and access routes.	Construction, Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> • Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. 	0,6	1,44
	Disturbance/ poaching of animals	Construction	3	3	3	3	3	0,6	1,8	<ul style="list-style-type: none"> • Drilling contractors are only allowed to move within the designated drilling area. • Environmental awareness training should include poaching and disturbance of animals 	0,6	1,08

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
	Encroachment of Alien Invasive Plants	Construction , Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> • Monitor areas for proliferation of Alien Invasive Plants during operations and after rehabilitation has been undertaken • Eradication of Alien Invasive Plants as required • Disturbance must be minimized and only be allowed in demarcated areas 	0,6	1.4
Sensitive and Protected Areas	Degradation and destruction of sensitive biodiversity	Construction , Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> • No-go areas to be identified. • Environmental awareness training of all employees responsible for drilling. • Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. • No activities to be conducted within the 100m buffer zones around water courses. • No activities to be conducted within the irreplaceable CBA 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> Site selection aimed at minimising disturbance to natural vegetation. 		
Heritage Resources	Cultural heritage resources may be found within the study area	Construction and Operation	3	3	3	3	3	0,6	1,8	<ul style="list-style-type: none"> A 50 meter buffer zone must be established around any heritage site observed during site establishment. 	0,6	1,08
Economic Development	Contribution to the economy. Using local services such as accommodation .	Construction and Operation	1	4	3	2	2,5	0,2	0,5	<ul style="list-style-type: none"> Preference to be given to the use of local services providers for accommodation, purchasing of petrol etc. 	1	0,5
Visual and Sense of Place	Loss of sense of place due to prospecting activities	Construction , Operation & Closure	2	3	2,5	3	2,75	0,8	2,2	<ul style="list-style-type: none"> Implement measures to reduce the visual impacts of prospecting activities, i.e. rehabilitation of drill sites and access roads. Buffers around residential units must be implemented. 	0,6	1,32

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Safety and Security	Movement of drilling contractors and influx of workers - increase in crime	Construction and Operation	3	4	3,5	4	3,75	0,6	2,25	<ul style="list-style-type: none"> Drilling contractors not allowed moving outside of designated areas. Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. All personnel that have access to the property will be provided with access cards. All personnel that have access to the property need to be made visible. Drilling contractors to be housed off site. 	0,6	1,35
	Overnight accommodation of drilling contractors - increase in crime	Construction , Operation & Closure	3	4	3,5	4	3,75	0,6	2,25		0,6	1,35
Stakeholder Acceptability	Prospecting on private property	Construction , Operation & Closure	4	4	4	3	3,5	0,8	2,8	<ul style="list-style-type: none"> Comply with the MPRDA & NEMA Implement and Comply with the EMP 	0,6	1,68
Social impact	Prospecting seen as a predecessor to mining and this raises a risk to various environmental impacts	Construction , Operation & Closure	4	4	4	4	3,75	0,8	3,2	<ul style="list-style-type: none"> An application for a mining right will require a separate EIA and public participation process and IAPs will be provided with the opportunity to raise their concerns. 	0,4	1,28

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> This report should form part of the feasibility study towards a mining right application to ensure the current information and sensitivities identified in this process is considered 		

v. Methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;

(Describe how the significance, probability, and duration of the aforesaid identified impacts that were identified through the consultation process was determined in order to decide the extent to which the initial site layout needs revision).

Assessment of the significance of the potential impacts

Please find attached as Appendix 5 the detailed environmental impact assessment table that includes the significance of all impacts in column F (potential impacts), and G (residual impacts).

The impact assessment method used in this assessment takes into account the current environment, the details of the proposed amendment activities and the findings of the specialist studies. Cognisance has been given to both positive and negative impacts that may result from the developments. The significance of the impact is dependent on the consequence and the probability that the impact will occur.

$$\text{impact significance} = (\text{consequence} \times \text{probability})$$

Where:

$$\text{consequence} = (\text{severity} + \text{extent})/2$$

and

$$\text{severity} = [\text{intensity} + \text{duration}]/2$$

Each criterion is given a score from 1 to 5 based on the definitions given below. Although the criteria used for the assessment of impacts attempts to quantify the significance, it is important to note that the assessment is generally a qualitative process and therefore the application of this criteria is open to interpretation. The process adopted will, therefore, include the application of scientific measurements and professional judgement to determine the significance of environmental impacts associated with the project. The assessment thus largely relies on experience of the environmental assessment practitioner (EAP) and the information provided by the specialists appointed to undertake studies for the basic assessment.

Where the consequence of an event is not known or cannot be determined, the “precautionary principle” has been applied and the worst-case scenario assumed. Where possible, mitigation measures to reduce the significance of negative impacts and enhance positive impacts will be recommended. The significance of the impact in light of the mitigation measures has also been rated based on a confidence rating of the mitigation measures.

Consideration will be given to the phase of the project during which the impact occurs. The phase of the development during which the impact will occur will be noted to assist with the scheduling and implementation of management measures.

Criteria for Assessing the Impact Significance

Severity Criteria

INTENSITY = MAGNITUDE OF IMPACT	RATING
Insignificant: impact is of a very low magnitude	1
Low: impact is of low magnitude	2
Medium: impact is of medium magnitude	3
High: impact is of high magnitude	4
Very high: impact is of highest order possible	5

DURATION = HOW LONG THE IMPACT LASTS	RATING
Very short-term: impact lasts for a very short time (less than a month)	1
Short-term: impact lasts for a short time (months but less than a year)	2

Medium-term: impact lasts for the for more than a year but less than the life of operation.	3
Long-term: impact occurs over the operational life of the proposed mine.	4
Residual: impact is permanent (remains after mine closure)	5

EXTENT = SPATIAL SCOPE OF IMPACT/ FOOTPRINT AREA / NUMBER OF RECEPTORS	RATING
Limited: impact affects the mine site	1
Small: impact extends to the whole farm portion	2
Medium: impact extends to neighbouring properties	3
Large: impact affects the surrounding community	4
Very Large: The impact affects an area larger the municipal area	5

Probability

PROBABILITY = LIKELIHOOD THAT THE IMPACT WILL OCCUR	RATING
Highly unlikely: the impact is highly unlikely to occur	0.2
Unlikely: the impact is unlikely to occur	0.4
Possible: the impact could possibly occur	0.6
Probable: the impact will probably occur	0.8
Definite: the impact will occur	1

Impact Significance

NEGATIVE IMPACTS

≤1	Very low	Impact is negligible. No mitigation required.
>1≤2	Low	Impact is of a low order. Mitigation could be considered to reduce impacts. But does not affect environmental acceptability.
>2≤3	Moderate	Impact is real but not substantial in relation to other impacts. Mitigation should be implemented to reduce impacts.
>3≤4	High	Impact is substantial. Mitigation is required to lower impacts to acceptable levels.
>4≤5	Very High	Impact is of the highest order possible. Mitigation is required to lower impacts to acceptable levels. Potential Fatal Flaw.

POSITIVE IMPACTS

≤1	Very low	Impact is negligible.
>1≤2	Low	Impact is of a low order.
>2≤3	Moderate	Impact is real but not substantial in relation to other impacts.
>3≤4	High	Impact is substantial.
>4≤5	Very High	Impact is of the highest order possible.

DEVELOPMENT PHASE

C	Impact is applicable to the CONSTRUCTION PHASE ONLY
O	Impact is applicable to the OPERATIONAL PHASE ONLY
C&O	Impact is applicable to the CONSTRUCTION AND OPERATIONAL PHASE

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

The mitigation measures for each of the identified impacts are included in Section 11 and in the EMPr in part B.

The significance of the impact with mitigation has been weighted by multiplying the significance rating without significance by the following depending on the confidence placed in the successful implementation of the mitigation measures or the effectiveness of those measures in reducing the impact.

1	Very low	Measures are very difficult or expensive to implement or are not expected to be effective in reducing the impact (No Confidence)
0.8	Low	Measures are difficult or expensive to implement or are expected to have limited effectiveness in reducing the impact (20% Confidence)
0.5	Moderate	Measures can be implemented with some effort and cost and/or the measures can be effective in mitigating the impact if implemented (50% Confidence)
0.2	High	There is high confidence that mitigation measures can be implemented and can be effective in mitigating the impact (80% Confidence)

vi. The positive and negative impacts that the proposed activity (in terms of the initial site layout) and alternatives will have on the environment and the community that may be affected.

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

The following key concerns have been identified. These include:

1. Vulnerability of surface water resources.
2. Safety of landowners.
3. Conflict with land uses (agriculture and mining)
4. Rehabilitation of drill sites.

The initial site layout was planned on a 350 m x 350 m grid and overlay all land uses, sensitive features (eg. water resources). Over 400 boreholes formed part of the original grid. In order to minimise the impact of drilling activities on surface water a 100 meter buffer was allocated for each stream, river and wetlands. All boreholes within this buffer were removed. A 100m buffer has also been established from infrastructure such as roads and railways. All boreholes within the irreplaceable CBA and those that overlapped with residential units have been removed. A total of 107 boreholes have remained. Several drill sites are still located within cropland but agreement or compensation will need to be sought should the specific site be developed.

The drill sites themselves will be provided with safety netting, fencing and signage to ensure no person or animal can access the drill site. Drill rig operators will not be housed on site. In addition, rehabilitation objectives will include ensuring that the site is safe for the current land uses.

vii. 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).

Table 1: Possible mitigation measures to issues raised by I&APs

Nr	Issue Raised	Raised By	Mitigation/ Response	Mitigation Failure Risk
1	Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an “interested and affected party. We vehemently object to any prospecting over our properties, as the	Bryan Drew Tugela Farms cc	The positioning of the boreholes as per the final layout plan of the Basic Assessment Report (BAR) will take into account all water courses on site and will not be situated within a 100m buffer from dams, wetlands or streams to avoid impacts. The Environmental Management Programme (EMPr) provides measures that must be	Low

Nr	Issue Raised	Raised By	Mitigation/ Response	Mitigation Failure Risk
	<p>proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.</p>		<p>implemented to prevent or minimise impacts on water resources. The applicant is committed to rehabilitate all prospecting sites according to the closure and rehabilitation plan.</p> <p>The EMPr makes provision for the applicant to approach all to reach an agreement should prospecting be conducted on areas where cultivation and other farming activities are conducted.</p>	
2	<p>5. Safety and Security</p> <p>It is noted that drilling will be undertaken for a period of 48 months where contractors and drilling personnel will be allowed access to the site. This poses a significant security concern for the occupants of the land (specifically the vulnerable members of the community, such as women and children). Reputable drilling contractors will be used and workers will be under strict supervision to prevent any negligence related to activities such as the closing of gates.</p>	Green H Ranches	<p>The following mitigation measures have been included in the EMPr related to safety</p> <ul style="list-style-type: none"> • Drilling contractors will not be allowed moving outside of designated areas. • Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. • All personnel that have access to the property will be provided with access cards. • All personnel that have access to the property need to be made visible. • Drilling contractors to be housed off site. 	Low
3	<p>The contamination of water courses, dams and soil will result in long-term and possibly irrevocable damage to farming operations. In the event of contamination, what are</p>	Green H Ranches	<p>A hierarchy approach will be implemented to mitigate potential impacts, therefore the 100 meter buffers will be implemented to prevent any disturbance.</p>	

Nr	Issue Raised	Raised By	Mitigation/ Response	Mitigation Failure Risk
	the procedures and penalties to be enforced?		<p>Section 1.2.2 of the EMPr stipulates specific requirements/procedures for the management of hazardous substances, also in the case of spillages.</p> <p>The following mitigation has been included in the EMPr to prevent/minimise impacts on surface and groundwater, as well as users:</p> <ul style="list-style-type: none"> ▪ Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. ▪ Diesel storage areas to be bunded and regularly checked. ▪ Drip trays to be placed under vehicles susceptible of dripping oil. ▪ Spill kits to be available at drill sites. ▪ Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). ▪ Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. <p>Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed.</p> <ul style="list-style-type: none"> ▪ Diesel storage areas to be bunded and regularly checked. ▪ Drip trays to be placed under vehicles susceptible of dripping oil. ▪ Spill kits to be available at drill sites. <p>Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals).</p>	

viii. Motivation where no alternative sites were considered.

Alternative layout options and drill site locations were considered during the study. The project location was however bound to the current location due to the underlying geology. The prospecting right is dependent on the area chosen being susceptible to possible coal deposits and therefore no alternative site could be considered.

ix. Statement motivating the alternative development location within the overall site. (Provide a statement motivating the final site layout that is proposed)

The final layout of the drilling can only be completed once the non-invasive aerial geological surveys are completed. Invasive prospecting (drilling and trenching) will avoid wetlands, rivers and 100m buffer zones / 1:100 year flood lines (whichever is greatest), and 50m buffer zones from potential historical sites, graves and identified protected plants. Drill site locations are not fixed and need approval by an environmental control officer before drilling. The ECO will, as a minimum, consider:

- Plant and animal sensitivity
- Current land use
- Sensitive features such as households
- Heritage sites (including graveyards)

i) Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site (In respect of the final site layout plan) through the life of the activity. (Including (i) a description of all environmental issues and risks that are identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.)

The same impact ranking criteria and methodology was employed as discussed in Section VI of this report.

j) Assessment of each identified potentially significant impact and risk

(This section of the report must consider all the known typical impacts of each of the activities (including those that could or should have been identified by knowledgeable persons) and not only those that were raised by registered interested and affected parties).

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Topography						
Levelling of drilling sites.	Change in natural topography of the site.	Topography	Construction	<ul style="list-style-type: none"> Stockpile soils removed for rehabilitation. Rehabilitate to original landform. 	Neg Low	Neg Low
Geology						
Removal of geological core	Creation of conduits between geological strata.	Geology	Operations	<ul style="list-style-type: none"> Boreholes to be sealed with concrete. 	Neg Low	Neg Very low
Soils						
Erosion from soil disturbance at drilling sites.	Potential loss of topsoil.	Soils	Operations	<ul style="list-style-type: none"> Keep the footprint of disturbance as small as practicably possible. Vegetation to be left in place to protect soils where possible. Where vegetation clearance cannot be avoided, storm water management measures to be put in place if there is a risk of soil erosion. Erosion protection where cut and fill and levelling of the drill site occurred. 	Neg Low	Neg Very low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Erosion from soil disturbance on access roads.	Potential loss of soil resource.	Soils	Construction & Operation	<ul style="list-style-type: none"> Utilise existing access roads as far as possible. Keep the footprint of disturbance as small as practicably possible. Access roads to follow slope contours where possible. Vegetation to be left in place at the sides of the road to protect the soils. 	Neg Low	Neg Very low
Oil and diesel spills due to inappropriate storage, vehicle maintenance and washing operations.	Risk of soil contamination.	Soils	Construction, Operation and Closure	<ul style="list-style-type: none"> Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. 	Neg Low	Neg Low
Surface Water						
Spillage from fuels, oils and lubricants.	Contamination of surface water.	Surface Water	Construction, Operation and Closure	<ul style="list-style-type: none"> Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. 	Neg Med	Neg Low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Increase in sediment loads as a result of erosion and heavy rainfall.		Surface Water	Construction, Operation and Closure	<ul style="list-style-type: none"> Implement measures for soil erosion control in accordance with risk assessment. Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. 	Neg Med	Neg Low
General and human waste.		Surface Water	Construction, Operation and Closure	<ul style="list-style-type: none"> Contractors may only use designated toilets and waste disposal facilities. Separate, marked receptacles are to be provided for the storage of hazardous and general wastes at the waste generation points. Littering is not to be permitted. Measures for waste avoidance, minimisation, reuse and recycling must be implemented. All items that have come into contact with any hazardous chemical substance (including fuels/oils/greases/laboratory chemicals, sludge) are to be disposed as hazardous waste. All waste are to be disposed of as general waste. 	Neg Low	Neg Very low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Disturbance caused by drilling footprint		Surface Water	Construction	<ul style="list-style-type: none"> Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. Keep the footprint of disturbance as small as practicably possible. 	Neg Med	Neg Low
Hydrogeology (Groundwater)						
Seepage of fuels, oils and lubricants.	Contamination of groundwater.	Groundwater	Construction, Operation and Closure	<ul style="list-style-type: none"> Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. 	Neg Low	Neg Low
Cross contamination of aquifers due to borehole construction.		Groundwater	Operation & Closure	<ul style="list-style-type: none"> Boreholes that will not be used again will be backfilled with cement and sealed. Mitigation will entail the use of biodegradable or eco friendly drilling liquid. Alternatively, a drilling sock can also be used to soak up any 	Neg Low	Neg Very low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
				contamination remaining after drilling operations have been completed. <ul style="list-style-type: none"> Purging of the borehole upon completion or to seal the borehole to prevent further use. The borehole can also be sealed to prevent use of the water for potable purposes. 		
Noise						
Machinery and drilling operations. Movement of vehicles.	Increase in ambient noise levels. Disturbance to people and animals.	Noise	Construction, Operation and Closure	<ul style="list-style-type: none"> Avoid travelling past residences. Speed limit of 40km/h will be enforced Liaise with landowner on areas sensitive to noise. Provide a buffer of 100m from households. Drilling to take place during daylight hours. Borehole site and access route selection to minimize impacts on noise receptors 	Neg Moderate	Neg Low
Air Quality						
Exhaust fumes from vehicles and machinery related to prospecting activities.	Release of gaseous emissions.	Air Quality	Construction, Operation and Closure	<ul style="list-style-type: none"> No unnecessary revving of vehicles should take place. No vehicle must stand idling when not in use. 	Neg Low	Neg Very low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Vehicles travelling on gravel roads.	Dust fallout and fine particular matter emissions.	Air Quality	Construction, Operation and Closure	<ul style="list-style-type: none"> Restrict travelling speed of vehicles to reduce vehicle entrainment of dust. Visual inspections will be conducted by the appointed Environmental Control Officer (ECO) and additional mitigation such as spraying of water on exposed surface will be conducted if increased dust generation is noted. 	Neg Low	Neg Low
Land Use and Land Capability						
Intrusion due to drilling and prospecting activities in an area where agricultural and mining land uses are prominent.	Land use conflict.	Land Use	Construction & Operation	<ul style="list-style-type: none"> Drilling sites must be selected to minimize disturbance of current land use. Relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling. Rehabilitation of drill sites and access roads. 	Neg Moderate	Neg Low
Land clearing and transformation.	Reduction in land capability.	Land Use	Construction	<ul style="list-style-type: none"> Drilling sites must be selected to minimize disturbance of current land use. Relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling. 	Neg Low	Neg Low
Fauna, Flora and Ecology						

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Establishment of drilling sites and access routes.	Removal/ damage of natural vegetation	Fauna, Flora and Ecology	Construction	<ul style="list-style-type: none"> No-go areas to be identified. Environmental awareness training of all employees responsible for drilling. Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. No activities to be conducted within the critical biodiversity areas Site selection aimed at minimising disturbance to natural vegetation. Limit disturbance in sensitive or densely vegetated areas and no vegetation clearance except for borehole access point in these sites. The seed mix used for rehabilitation must take into account the dominant plant species of the area. 	Neg Moderate	Neg Low
Accidental fires.		Fauna, Flora and Ecology	Construction, Operation & Closure	<ul style="list-style-type: none"> No smoking at the drilling sites. Code of conduct to include measures for the prevention of fires. Emergency equipment and procedures for fire fighting to be in place. Adhere to emergency procedures. 	Neg Moderate	Neg Low
Establishment of drilling sites and access routes.	Disturbance/ poaching of animals	Fauna, Flora and Ecology	Construction	<ul style="list-style-type: none"> Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. 	Neg Moderate	Neg Low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Movement of drilling contractors.		Fauna, Flora and Ecology	Construction, Operation & Closure	<ul style="list-style-type: none"> Drilling contractors are only allowed to move within the designated drilling area. Environmental awareness training should include poaching and disturbance of animals 	Neg Moderate	Neg Low
Disturbance caused by drilling footprint	Encroachment of Alien Invasive Plants		Construction, Operation & Closure	<ul style="list-style-type: none"> Monitor areas for proliferation of Alien Invasive Plants during operations and after rehabilitation has been undertaken Eradication of Alien Invasive Plants as required Disturbance must be minimized and only be allowed in demarcated areas 	Neg Moderate	Neg Low
Sensitive and Protected Areas						
Establishment of drilling sites and access routes.	Degradation and destruction of sensitive biodiversity	Biodiversity	Construction, Operation & Closure	<ul style="list-style-type: none"> No-go areas to be identified. Environmental awareness training of all employees responsible for drilling. Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. No activities to be conducted within the 100m buffer zones around water courses/wetlands. No activities to be conducted within the irreplaceable CBAs. Site selection aimed at minimising disturbance to natural vegetation. 	Neg Moderate	Neg Low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Heritage Resources						
Drilling of boreholes will damage/destroy heritage resources in the area.	Cultural heritage resources may be found within the study area	Heritage Resources	Construction and Operation	<ul style="list-style-type: none"> A 50 meter buffer zone must be established around any heritage site observed during site establishment. 	Neg Low	Neg Low
Economic Development						
Purchasing local services and goods.	Contribution to the economy.	Economic Development	Construction and Operation	<ul style="list-style-type: none"> Preference to be given to the use of local services such as accommodation, fuel purchases and food. 	Pos Moderate	Pos Moderate
Dust and noise from prospecting activities.	Creation of nuisance and disturbance to surrounding activities.	Communities	Construction, Operation & Closure	<ul style="list-style-type: none"> Implement measures to minimize air quality and noise impacts. Surrounding neighbours and landowners must be allowed to raise issues and complaints associated with prospecting activities. Their issues must be addressed promptly. 	Neg Low	Neg Low
Visual and Sense of Place						
Visual intrusion due to drilling and prospecting activities	Loss of sense of place due to prospecting activities	Visual and Sense of Place	Construction and Operation	<ul style="list-style-type: none"> Implement measures to reduce the visual impacts of prospecting activities, i.e. rehabilitation of drill sites and access roads. 	Neg Moderate	Neg Low

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
Safety and Security						
Movement of drilling contractors and influx of workers	Increase in crime	Safety & Security	Construction and Operation	<ul style="list-style-type: none"> Drilling contractors not allowed moving outside of designated areas. Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. All personnel that have access to the property will be provided with access cards. All personnel that have access to the property needs to be made visible. 	Neg Moderate	Neg Low
Overnight accommodation of drilling contractors		Safety & Security	Construction, Operation & Closure	<ul style="list-style-type: none"> Drilling contractors to be housed off the drilling property. 	Neg Moderate	Neg Low
Stakeholder Acceptability						
Prospecting activities is a predecessor to mining.	Prospecting on private property	Stakeholder Acceptability	Construction, Operation & Closure	<ul style="list-style-type: none"> Comply with the MPRDA & NEMA Implement and Comply with the EMP 	Neg High	Neg Low
Prospecting activities. Mining right application.	Prospecting seen as a predecessor to mining and this raises a risk to various environmental impacts	Stakeholder Acceptability	Construction, Operation & Closure	<ul style="list-style-type: none"> An application for a mining right will require a separate public participation process and IAPs will be provided with the opportunity to raise their concerns. This report should form part of the feasibility study towards a mining right 		

ASSESSMENT OF IMPACTS AND MITIGATION MEASURES					POTENTIAL IMPACTS (without mitigation)	RESIDUAL IMPACTS (with mitigation)
Activity	Potential Impact	Aspects Affected	Phase	Mitigation Measures / Enhancement Measures	Significance (Consequence + Probability)	Significance (Consequence + Probability)
				application to ensure the current information and sensitivities identified in this process is considered		

The supporting impact assessment conducted by the EAP must be attached as an appendix, marked **Appendix 3**

k) Summary of specialist reports.

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

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X where applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED.
<p>No specialist studies were undertaken as the EAP was confident in the status of the proposed site. The project team consists of qualified environmental assessment practitioners that have sufficient experience to inform the report on potential impacts and the baseline environment. The EAP also considered the temporary nature and limited footprint of the proposed project drill sites.</p>			

I) Environmental impact statement

(i) Summary of the key findings of the environmental impact assessment;

The environmental impacts associated with the proposed project are largely low to moderate with no high impacts anticipated. The most significant impacts are:

Impact	Significance	Comment	Mitigation
Negatively affecting the surface water quality. Disturbance of surface water resources.	<p>Before Mitigation Negative Moderate</p> <p>After Mitigation Negative Low</p>	Various non-perennial streams, wetlands and dams are located within the project area. Surface water is integral to operation of agricultural activities.	<ul style="list-style-type: none"> - 100 meter buffers will be established from any surface water resources. - Storm water diversion measures and containment of hazardous substances will be implemented. - Water will be recycled as far as possible using a closed loop sump system. - Adequate waste management practices should be implemented.
Conflicting land uses (agriculture)	<p>Before Mitigation Negative Moderate</p> <p>After Mitigation Negative Low</p>	Drilling may potentially be conducted within croplands which may affect planting, ploughing and harvesting activities.	<ul style="list-style-type: none"> - drilling will be planned to take place outside of farming activities where possible. - where not possible compensation will be discussed and agreed with the affected party. - Rehabilitation of drilling sites will be conducted on a concurrent basis and will consider further use of the land. - agreement with landowners.

The nature of prospecting involves invasive drilling of sites not exceeding 15m x 20m. The drill sites are not fixed and can be relocated by 1-50 meters. Due to the flexibility of the drill sites and small size the key mitigation is to approve each site on environmental factors by a competent environmental officer. Each drill site will be rehabilitated to its natural status before drilling. The success of the proposed mitigation is high.

(ii) Final Site Map

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

Please see figure 14 and Appendix 4 in which the final drill site map is presented; including site sensitivities and their buffers. Please note the infrastructure of existing mining operations on the south-eastern and eastern boundary of the project area has not been considered until final agreement is sought with the mining entity.

(iii) Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

Refer to the Table in Section i for the summary of impacts.

The most significant risks associated with the project are potential damage (pollution and physical disturbance) to water resources (wetlands, dams and streams) and terrestrial habitats. The project also has the potential to cause a change/conflict in land use and cause impacts on the sense of place due to noise generation for local residents. All these impacts can be prevented/minimised through proper planning and thorough visual surveys of sites targeted for prospecting. Positive impacts are associated with the brief creation of jobs and is considered of moderate to low significance. This has been assessed in terms of the prospecting operation on its own; however should this prospecting right be converted into a Mining Right, then the social benefits will be of moderate to high significance.

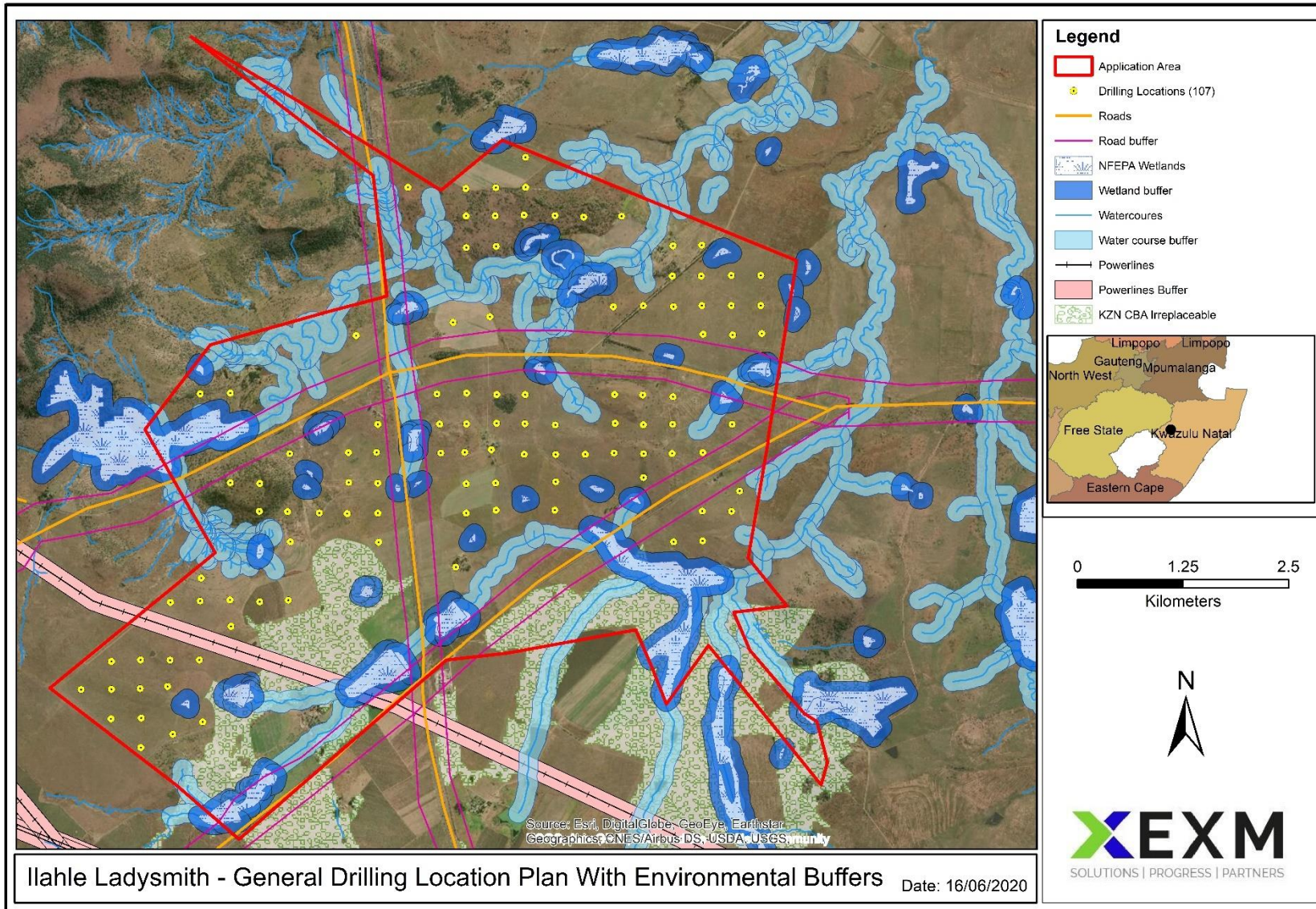


Figure 14: Final Drill Site Map and Sensitivities.

m) Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr;

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

The objectives of impact mitigation and management are to:

- Primarily pre-empt impacts and prevent the realisation of these impacts -PREVENTION.
- To ensure activities that are expected to impact on the environment are undertaken and controlled in such a way so as to minimise their impacts – MODIFY and/or CONTROL.
- To ensure a system is in place for treating and/or rectifying any significant impacts that will occur due to the proposed activity – REMEDY.
- Implement an adequate monitoring programme to:
 - Ensure that mitigation and management measure are effective.
 - Allow quick detection of potential impacts, which in turn will allow for quick response to issue/impacts.
 - Reduce duration of any potential negative impacts.

Environmental impact management outcomes are:

- Conduct prospecting activities responsibly and ensure operation is compliant with legislative requirements.
- Protect the biophysical environment as far as possible, specifically wetlands and riverine areas and any protected species observed on site.
- Protect the water resources in the area as far as possible.
- Ensure atmospheric pollution is kept to a minimum:
- Ensure adequate rehabilitation to allow continued grazing and crop cultivation land use.
- Ensure socially responsible activities.
- Protect historical and cultural sites if they are observed on site.

n) Aspects for inclusion as conditions of Authorisation.

Any aspects which must be made conditions of the Environmental Authorisation

- No activity is to occur within wetlands and their 100m buffer zones, within rivers and their 100m buffer zone / 1:100 year flood line without the necessary authorisation under NEMA and NWA.
- Infrastructure, including powerlines and Telkom lines, and associated buffer zones must be avoided.
- Protected species must remain in situ until the necessary permits are obtained under NEM:BA.
- Heritage sites and 50m buffer zones will be preserved at all times unless the necessary permits are obtained under NHRA
- Agreement needs to be sought with existing land uses that are in conflict with prospecting eg. mining and agriculture
- Rehabilitation must be applied on an on-going basis and no sites must be left exposed for more time than necessary to obtain the necessary data.

o) Description of any assumptions, uncertainties and gaps in knowledge.

(Which relate to the assessment and mitigation measures proposed)

At this stage the exact location of the invasive prospecting is not conclusive, due to the fact that the locations will be dependent on the findings of non-invasive techniques. This is not seen as a major gap as the lack of this knowledge has been worked into the EMP as well as the proposed conditions stipulated above. In general, the approach will be as follows for invasive prospecting:

- All water features (wetlands, non-perennial streams and dams) and associated buffers must be avoided by prospecting activities.
- Any heritage sites, including graves, and buffers must be avoided by prospecting activities.
- The critical biodiversity areas within on the southern portion of the site must be avoided.
- Any residential units must be avoided.
- Activities must remain outside all wetland areas unless authorisation has been obtained under NEMA and NWA.

p) Reasoned opinion as to whether the proposed activity should or should not be authorised

i) Reasons why the activity should be authorized or not.

The EAP believes that the authorisation of the activity should be granted. The prospecting sites will not cover large areas and the disturbance will not be significant.

The risks pertaining to the prospecting activity are minimal and can be easily mitigated by following the mitigation measures stipulated in the EMP, which will reduce the dsignificance of impacts to within acceptable levels and the bio-physical environment will easily recover.

ii) Conditions that must be included in the authorisation

- No activity is to occur within wetlands and their 100m buffer zones, within rivers and their 100m buffer zone / 1:100 year flood line without the necessary authorisation under NEMA and NWA.
- Protected species must remain in situ unless the necessary permits are obtained under NEM:BA.
- Heritage sites and 50m buffer zones will be preserved at all times unless the necessary permits are obtained under SAHRA.
- Agreement needs to be sought with existing land uses that are in conflict with prospecting eg. prospecting and agriculture.
- Rehabilitation must be applied on an on-going basis and no sites must be left exposed for more time than necessary to obtain the necessary data.

q) Period for which the Environmental Authorisation is required.

Five (5) years

r) Undertaking

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

The applicant representative, Mbongiseni Alfred Sibisi, hereby confirms the undertaking to ensure implementation and compliance with the Basic Assessment Report and Environmental Management Programme.

s) Financial Provision

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

R 91 904,00 (excl VAT)

i) Explain how the aforesaid amount was derived.

A Final Rehabilitation, Decommissioning and Mine Closure Plan (**Appendix 6**) has been developed for the site in terms of the NEMA Financial Provision Regulations which contains details regarding the actions for rehabilitation as well as detailed description of the methodology for calculating the financial provision. A latent environmental risk report is also attached as **Appendix 7**.

The rehabilitation liability has been calculated by EXM according to regulation 6 of the financial provision for prospecting, exploration, mining or production operations regulations (GNR 1147, November 2015). These regulations prescribe the required minimum content as follows: “a detailed itemisation of all activities and costs, calculated based on the actual costs of implementation of the measures required.” The regulation further outlines that closure cost estimation must include the following:

1. An explanation of the closure cost methodology;
2. Auditable calculations of costs per activity or infrastructure; and
3. Cost assumptions;

The model used to develop the rehabilitation cost for the Ilahle Ladysmith Prospecting Area was developed in Microsoft Excel. An itemised list of all the required actions was included, which considered measurements of the areas to be rehabilitated. The rates for earthworks were calculated based on site conditions and typical plant hire rates.

An appropriately sourced contractor rate for 2020 was applied to each rehabilitation action to be implemented. These rates were obtained from recent projects undertaken by EXM and contractor sourced rates.

As stated in Section 12.1, no more than six boreholes will be active/disturbed at any time and rehabilitation of the first two boreholes will commence once prospecting commences at the next two sites. The project is committed to continuous rehabilitation on completion of each borehole. It is not anticipated that more than six boreholes will require rehabilitation at any one time and therefore the calculations for the quantum reflects this commitment.

The liability calculation sheets have been developed to provide as much information as possible to indicate the actions, conditions and assumptions related to each cost item. The actual quantities, rates and liability calculations are provided in the calculation sheets. The rates used for the calculation of the rehabilitation liability can be updated to improve confidence and the level of accuracy required, by feeding this back into the rate calculations.

The quantum has been aligned with the rehabilitation and allows for the site to be rehabilitated back to the original status of the site. This will include:

- 1) Ensure all pollution sources are removed from site.
- 2) Ensure all infrastructure is removed from site.
- 3) Ensure that the existing land use can continue.
- 4) Ensure sustained vegetation growth.
- 5) Ensure that the site is stable and safe for humans and animals.

The activities considered during calculation of the quantum are based on drilling 107 boreholes within the project area. The project is committed to continuous rehabilitation on completion of each borehole. **It is not anticipated that more than six boreholes will require rehabilitation at any one time and therefore the quantum reflects this commitment.**

Existing roads will be used as far as possible and it is not possible to identify any new access roads at this stage as its route will be determined in conjunction with the landowner and activities on the property at that time. No other infrastructure, offices or housing, will be present within the prospecting area and all employees will be housed in nearby towns. Vegetation establishment is monitored after the first rain to ensure sustainability in the rehabilitation efforts.

ii) Confirm that this amount can be provided for from operating expenditure.

(Confirm that the amount, is anticipated to be an operating cost and is provided for as such in the Mining work programme, Financial and Technical Competence Report or Prospecting Work Programme as the case may be).

The provision forms part of the capital expense of the project and is not included in the operational budget allocated in the prospecting works programme. Allowance has been made for environmental reporting in the operational budget.

t) Specific Information required by the competent Authority

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

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

(Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any directly affected person including the landowner, lawful occupier, or, where applicable, potential beneficiaries of any land restitution claim, attach the investigation report as an **Appendix** .

The proposed prospecting activities are expected to be limited and thus opportunities for employment will be low. However, consideration will be given to local procurement of goods and services where practicable.

There is some concern that the introduction of the prospecting workforce into the farm communities can result in disputes. The prospecting workforce is not to interfere with any farm labourers or communities. No persons are to reside on the properties during prospecting activities.

(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)(j)(vi) and (vii) of that Act, attach the investigation report (no report) and confirm that the applicable mitigation is reflected in 2.5.3; 2.11.6.and 2.12.herein).

Section 3(2) of the National Heritage Resources Act, No. 25 of 1999 provides a description of all items that are classified as national estate. The EAP has evaluated the list in comparison with the project site. The results of the assessment are provided below with recommendations to the environmental officer where there was uncertainty.

National Estate Item	Present	Comment
(a) places, buildings, structures and equipment of cultural significance;	Possible	Buildings/farm houses are present on site and must be avoided by prospecting activities.
(b) places to which oral traditions are attached or which are associated with living heritage;	N	
(c) historical settlements and townscapes;	N	
(d) landscapes and natural features of cultural significance;	Unknown	
(e) geological sites of scientific or cultural importance;	Unknown	
(f) archaeological and palaeontological sites;	Unknown	
(g) graves and burial grounds, including—	Possible	No grave yards have been observed on site. Any graves detected during project initiation will be avoided and prospecting sites will be placed away from any such sites.
(i) ancestral graves;		
(ii) royal graves and graves of traditional leaders;		
(iii) graves of victims of conflict;		
(iv) graves of individuals designated by the Minister by notice in the Gazette;		
(v) historical graves and cemeteries; and		
(vi) other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);		
(h) sites of significance relating to the history of slavery in South Africa;	N	
(i) movable objects, including—		

National Estate Item	Present	Comment
(i) objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;	N/A	
(ii) objects to which oral traditions are attached or which are associated with living heritage;	N	
(iii) ethnographic art and objects;	N	
(iv) military objects;	N	
(v) objects of decorative or fine art;	N	
(vi) objects of scientific or technological interest; and	N/A	
(vii) books, records, documents, photographic positives and negatives,	N/A	

u) 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.

Section 24(4)(b)(i) of the Act requires the EAP to conduct an investigation of the potential consequences of impacts of alternatives to the activity on the environment and assessment of the significance of those potential consequences. Alternatives to the project are limited to the location of drill sites within the project area. Drill sites are not fixed and will only be confirmed during the desktop study if the prospecting right is awarded. The EAP has however provided a grid of possible drill site locations. The drill site locations were amended on consideration of watercourses and biodiversity. This consideration has given value to alternative sites by removing sites that pose a high significance impact to the project.

IAPs raised that that the application is in direct conflict with existing mining rights for coal (of which mining is already being undertaken). DMR need to ensure that a workable agreement is sought between all parties that hold mineral rights should this application be accepted. Special consideration needs to be made on the economics of the project, its impact on the water regime and protected areas.

PART B
ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

1) Draft environmental management programme.

- a) **Details of the EAP**, (Confirm that the requirement for the provision of the details and expertise of the EAP are already included in PART A, section 1(a) herein as required).

Name of The Practitioner: Trevor Hallatt
Tel No.: 071 689 2229
Fax No.: 086 407 9911
Email address: trevor@exm.co.za

In terms of section 13 (2&3) of the 2014 National Environmental Management Act EIA regulations (GNR. 982 of 2014):” In the event where the EAP or specialist does not comply with subregulation (1)(a) (which is the independence clause), the proponent or applicant must, prior to conducting public participation as contemplated in chapter 5 of these Regulations, appoint another EAP or specialist to externally review all work undertaken by the EAP or specialist, at the applicant's cost” The external reviewer however needs to be independent. To satisfy the above requirements Ilahle appointed EXM Advisory (Pty) Ltd as the Independent Environmental Assessment Practitioners (“EAP”) to compile the BA Report and to oversee the PPP for the Prospecting Right Application.

Please refer to Appendix 1 for a detailed CV.

- b) **Description of the Aspects of the Activity** (Confirm that the requirement to describe the aspects of the activity that are covered by the draft environmental management programme is already included in PART A, section (1)(h) herein as required).

The impacts and aspects have been compiled into the table below as reflected in the impact assessment contained in section 1(h & j) of Part A.

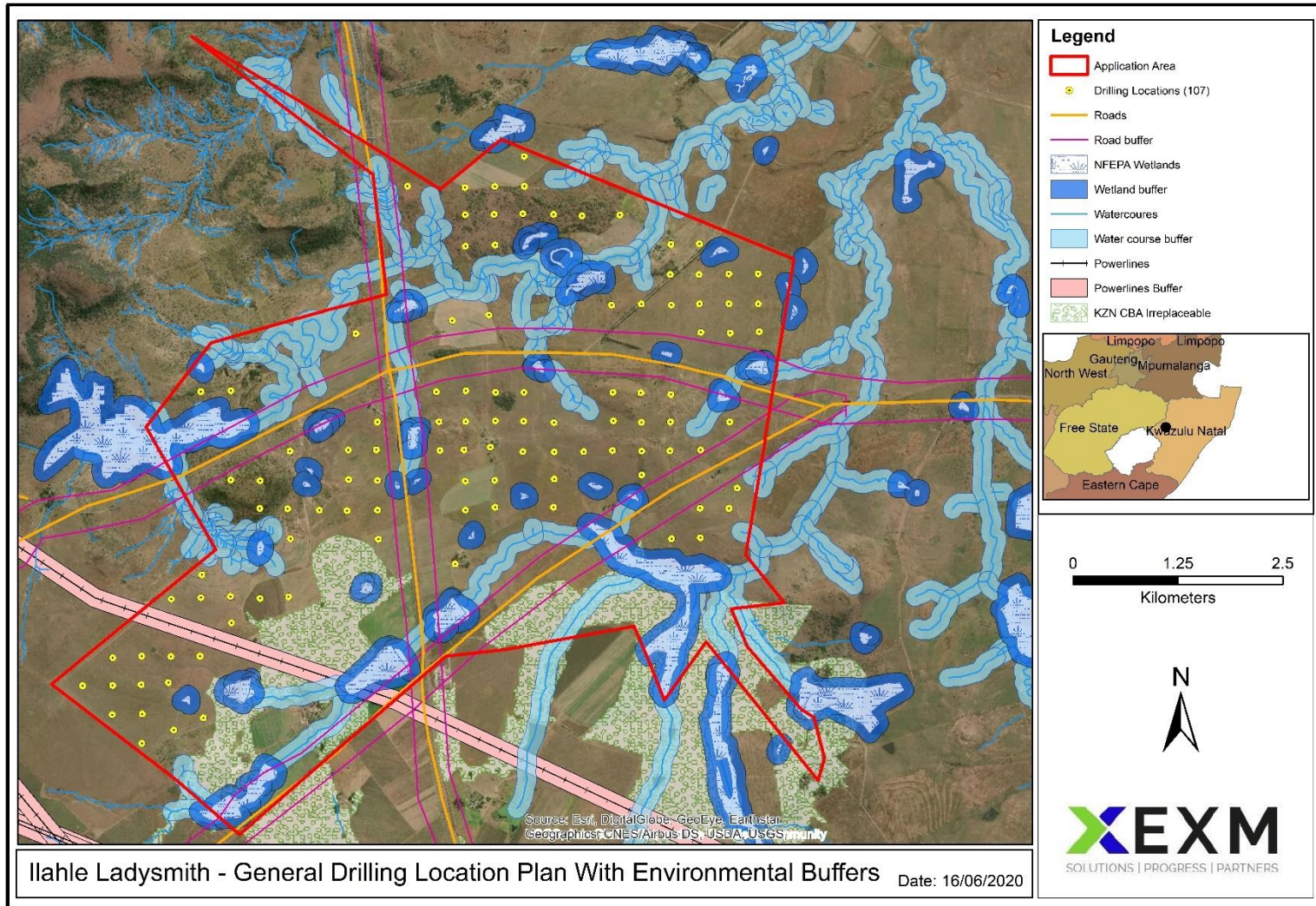
Impacts and Aspects			
Activity	Potential Impact	Aspects Affected	Phase
Leveling of drilling sites.	Change in natural topography of the site.	Topography	Construction
Removal of geological core	Creation of conduits between geological strata.	Geology	Operations
Erosion from soil disturbance at drilling sites.	Potential loss of topsoil.	Soils	Operations
Erosion from soil disturbance on access roads.	Potential loss of soil resource.	Soils	Construction & Operation
Oil and diesel spills due to inappropriate storage, vehicle maintenance and washing operations.	Risk of soil contamination.	Soils	Construction, Operation and Closure
Spillage from fuels, oils and lubricants.	Contamination of surface water.	Surface Water	Construction, Operation and Closure
Increase in sediment loads as a result of erosion and heavy rainfall.		Surface Water	Construction, Operation and Closure
General and human waste.		Surface Water	Construction, Operation and Closure
Seepage of fuels, oils and lubricants.	Contamination of ground water.	Groundwater	Construction, Operation and Closure
Cross contamination of aquifers due to borehole construction.		Groundwater	Operation & Closure
Machinery and drilling operations. Movement of vehicles.	Increase in ambient noise levels. Disturbance to people and animals.	Noise	Construction, Operation and Closure
Exhaust fumes from vehicles and machinery related to prospecting activities.	Release of gaseous emissions.	Air Quality	Construction, Operation and Closure
Vehicles travelling on gravel roads.	Dust fallout and fine particular matter emissions.	Air Quality	Construction, Operation and Closure
Intrusion due to drilling and prospecting activities in an area where agricultural and mining land uses are prominent.	Land use conflict.	Land Use	Construction & Operation
Land clearing and transformation.	Reduction in land capability.	Land Use	Construction

Impacts and Aspects			
Activity	Potential Impact	Aspects Affected	Phase
Establishment of drilling sites and access routes.	Removal/ damage of natural vegetation	Fauna, Flora and Ecology	Construction
Accidental fires.		Fauna, Flora and Ecology	Construction, Operation & Closure
Establishment of drilling sites and access routes.	Disturbance/ poaching of animals	Fauna, Flora and Ecology	Construction
Movement of drilling contractors.		Fauna, Flora and Ecology	Construction, Operation & Closure
Establishment of drilling sites and access routes.	Degradation and destruction of sensitive biodiversity	Biodiversity	Construction, Operation & Closure
Drilling of boreholes will damage/destroy heritage resources in the area.	Cultural heritage resources may be found within the study area	Heritage Resources	Construction and Operation
Purchasing local services and goods.	Contribution to the economy.	Economic Development	Construction and Operation
Dust and noise from prospecting activities.	Creation of nuisance and disturbance to surrounding activities.	Communities	Construction, Operation & Closure
Visual intrusion due to drilling and prospecting activities	Loss of sense of place due to prospecting activities	Visual and Sense of Place	Construction and Operation
Movement of drilling contractors and influx of workers	Increase in crime	Safety & Security	Construction and Operation
Overnight accommodation of drilling contractors		Safety & Security	Construction, Operation & Closure
Prospecting activities is a predecessor to mining.	Prospecting on private property	Stakeholder Acceptability	Construction, Operation & Closure

a) Composite Map

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

Please also refer to Appendix 4



b) Description of Impact management objectives including management statements

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

A Final Rehabilitation, Decommissioning and Mine Closure Plan (**Appendix 6**) has been developed for the site in terms of the NEMA Financial Provision Regulations which contains details regarding the actions for rehabilitation as well as detailed description of the methodology for calculating the financial provision. A latent environmental risk report is also attached as **Appendix 7**.

The closure objective allows for the site to be rehabilitated back to the original status of the site. This will include:

1. Ensure all pollution sources are removed from site.
2. Ensure all infrastructure is removed from site.
3. Ensure that the existing land use can continue.
4. Ensure sustained vegetation growth.
5. Ensure that the site is stable and safe for humans and animals.

Vegetation establishment is monitored after the first rain to ensure sustainability in the rehabilitation efforts.

- ii) **Volumes and rate of water use required for the operation.**

Only a small volume of water will be required during drilling. Approximately 50m³ of water will be used per day for a maximum of 90 days. This amounts to a total maximum of 4 500 m³. Water will also be brought onto site for potable use, this is estimated at 25 litres per person/day.

- iii) **Has a water use licence been applied for?**

No water use licence or water use authorisation? has been applied for. The project aims to utilise water from existing lawful users, an irrigation board or water services provider. Should water be required from a water resource if the above is unsuccessful a water use registration will be applied for.

No watercourses will also be impacted by the activity and an appropriate buffer has been created around all watercourses. A WUL will have to applied for or registration submitted if the activities trigger Section 21 (c) or (i).

- iv) **Impacts to be mitigated in their respective phases**

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

Objectives

This section provides for the environmental management of all prospecting activities to be undertaken in the prospecting area. The objective of this section is to detail actions required to address the potential impacts resulting from the identified activities to be undertaken during the establishment, operation and rehabilitation of drilling sites within the prospecting right area. This section elaborates on the implementation of the mitigation measures documented in the detailed impact assessment.

Environmental Impacts

The aim of this section is to reduce the significance of negative impacts and enhance positive impacts as far as practicably possible. The overall objectives are thus to:

- Minimize disturbance on the physical environment including the protection of soil, surface water and groundwater during drilling operations;
- Minimize disturbance to the ecological environment and prevent disturbance to sensitive sites;
- Prevent disturbance of sites of cultural and historical importance;
- Minimize disturbance to current land uses and neighbouring activities;
- Provide for a forum for consultation with landowners and affected parties; and
- Facilitate socio-economic development where practicable.

Rehabilitation

Prospecting activities are to be undertaken in a manner which facilitates site rehabilitation and the restoration of pre-disturbance land capabilities. The primary objectives for rehabilitation include the:

- Removal of all infrastructure and materials introduced to site;
- Removal and disposal of all waste;
- Promotion of the rapid re- establishment of natural vegetation and the restoration of site ecology;
- Facilitation of the re-establishment of the land use and land capability to as close as reasonably possible to the original conditions.

Action Plan

The various actions that need to be implemented, to ensure that the environmental objectives are met, are detailed in this section. The actions are aimed at preventing or mitigating environmental impacts and implementing the rehabilitation plan. The management actions are provided in a manner that ensures that they can be audited during the performance assessment programme.

Time Schedule

Time-frames detail the implementation schedule of management actions. The successful implementation and commencement within the timeframes is to be monitored as part of the performance assessment programme.

Requirements for Implementation

Additional measures that will need to be put in place to allow for the successful implementation of the action plan are listed where relevant. The table below presents the actions that need to be implemented to address the potential impacts resulting from establishment, operation and rehabilitation of drilling sites within the prospecting right area. The management actions are stated provided in a manner that ensures that they can be audited during the performance assessment programme. Once approved by the relevant authorities, the provisions of the EMP are legally binding on the project applicant and all its contractors and suppliers.

ACTIVITIES (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc	PHASE Planning and design, Pre-Construction, Construction, Operational, Rehabilitation, Closure, Post closure).	SIZE AND SCALE of disturbance (volumes, tonnages and hectares or m ²)	MITIGATION MEASURES (describe how each of the recommendations in herein will remedy the cause of pollution or degradation and migration of pollutants)	COMPLIANCE WITH STANDARDS (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)	TIME PERIOD FOR IMPLEMENTATION Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.
Drill site clearance	Construction	300m ²	<ul style="list-style-type: none"> - ECO to approve drill site location considering biodiversity, water resources, heritage and land use - Consult with landowner on drill site location demarcate drill site for safety - create an upstream berm to divert clean stormwater around the site - create a downstream berm to contain any dirty water 	<p>Compliance with SAHRA directive and Heritage Resources Act</p> <p>Implementation of the Impact management hierarchy to avoid, minimise, mitigate and rehabilitate</p> <p>Compliance with GN704 of the National Water Act</p>	<p>Prior to construction</p> <p>During construction</p> <p>To be installed during construction and removed after rehabilitation</p>
Establish water recycling sumps	Construction	2m ²	<ul style="list-style-type: none"> - remove topsoil where sumps will be placed for rehabilitation - line drill sumps with plastic to limit groundwater seepage 	<ul style="list-style-type: none"> - to meet rehabilitation standards - to limit groundwater contamination 	During construction
Clearance of access roads	Construction	~800m ²	<ul style="list-style-type: none"> - ECO to approve access road route - limit clearance to two lane tracks 	-Implementation of the Impact management hierarchy to avoid, minimise, mitigate and rehabilitate	During construction
Establish drill site	Construction	300m ²	<ul style="list-style-type: none"> - Chemical toilets need to be placed in close proximity to the drill site - All chemicals and fuels need to be stored in a bunded area - bins for general waste need to be provided - signage indicating hazards need to be placed at the entrance of the site - drill rig operators and labourers need to be provided with identification cards - no labourers are to be housed on site 	Occupation Health requirement Management of hazardous substances	During construction
Operation of the drill site	Operations	As above	- General waste needs to be collected and disposed of at a licensed facility	- impact mitigation	During operations

ACTIVITIES (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc	PHASE Planning and design, Pre-Construction, Construction, Operational, Rehabilitation, Closure, Post closure).	SIZE AND SCALE of disturbance (volumes, tonnages and hectares or m ²)	MITIGATION MEASURES (describe how each of the recommendations in herein will remedy the cause of pollution or degradation and migration of pollutants)	COMPLIANCE WITH STANDARDS (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)	TIME PERIOD FOR IMPLEMENTATION Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.
			<ul style="list-style-type: none"> - during rainfall events the drilling sumps need to be covered with plastic - no employees are allowed outside of the drill site barricading without permission from the site manager - water is to be sourced from existing lawful users - propsecting activities are only permitted during daytime hours - vehicles are not permitted to exceed 30km/h within the drill properties 		
Decommissioning and rehabilitation of the drill site Access roads	Rehabilitation	300m ² ~ 800m ²	<ul style="list-style-type: none"> - All infrastructure needs to be removed from the site - All waste and spillage needs to be cleaned and disposed of appropriately - plastic from drill sumps need to be removed - Chemical toilets need to be cleaned before they can be moved to the following drill site - The drill hole must be capped or sealed to limit water ingress and ensure safety for humans and animals - vehicles are not permitted to exceed 30km/h within the drill properties 	- Rehabilitation standards and objectives	Rehabilitation

A more detailed EMP has also been developed for the project that will be used in conjunction with this table. The EMP is included as Appendix 5

v) Financial Provision
(1) Determination of the amount of Financial Provision.

(a) Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under the Regulation.

A Final Rehabilitation, Decommissioning and Mine Closure Plan (**Appendix 6**) has been developed for the site in terms of the NEMA Financial Provision Regulations which contains details regarding the actions for rehabilitation as well as a detailed description of the methodology for calculating the financial provision. A latent environmental risk report is also attached as **Appendix 7**.

Ilahle 's closure vision for the Ladysmith Prospecting area is:

“To render a safe, stable and non-polluting environment aligned to regulatory and regional requirements, and ultimately provides a sustained post-closure ecosystem service or livelihood, leaving behind a positive post-mining legacy for the receiving community and our shareholders”.

The project closure and rehabilitation vision is founded on the following principles:

- Ensure areas are stable and safe for local communities.
- Sustainable exploitation of natural resources without limiting the ability of future generations to live off the same land.
- Limiting to the greatest extent possible, the disruption of natural ecosystems, and where necessary and possible, restoring the environment to its original state (baseline environment) after the cessation of activities. Alternatively, to restore all land to a status and land-use agreed upon between Ilahle and the relevant authorities, communities and other stakeholders.
- To ensure that the safety of people and animals is not compromised at any stage during and after any activities.

The closure objective allows for the site to be rehabilitated back to the original status of the site.

This will include:

- Ensuring all pollution generating activities are eliminated
- Ensuring all infrastructure is removed from site
- Ensuring that the existing land use can continue.
- Ensuring that the site is safe for humans and animals.

(b) Confirm specifically that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.

The basic assessment report and environmental management programme is provided to IAPs for review and comment for a 30-day period. The objective to rehabilitate the land that has been disturbed will be communicated to IAPs during the public consultation process, as included in the final closure and rehabilitation plan. The landowners will be allowed to comment on the measures that will be used for the rehabilitation of the site. Please refer to Appendix 2 for details regarding the PPP process.

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

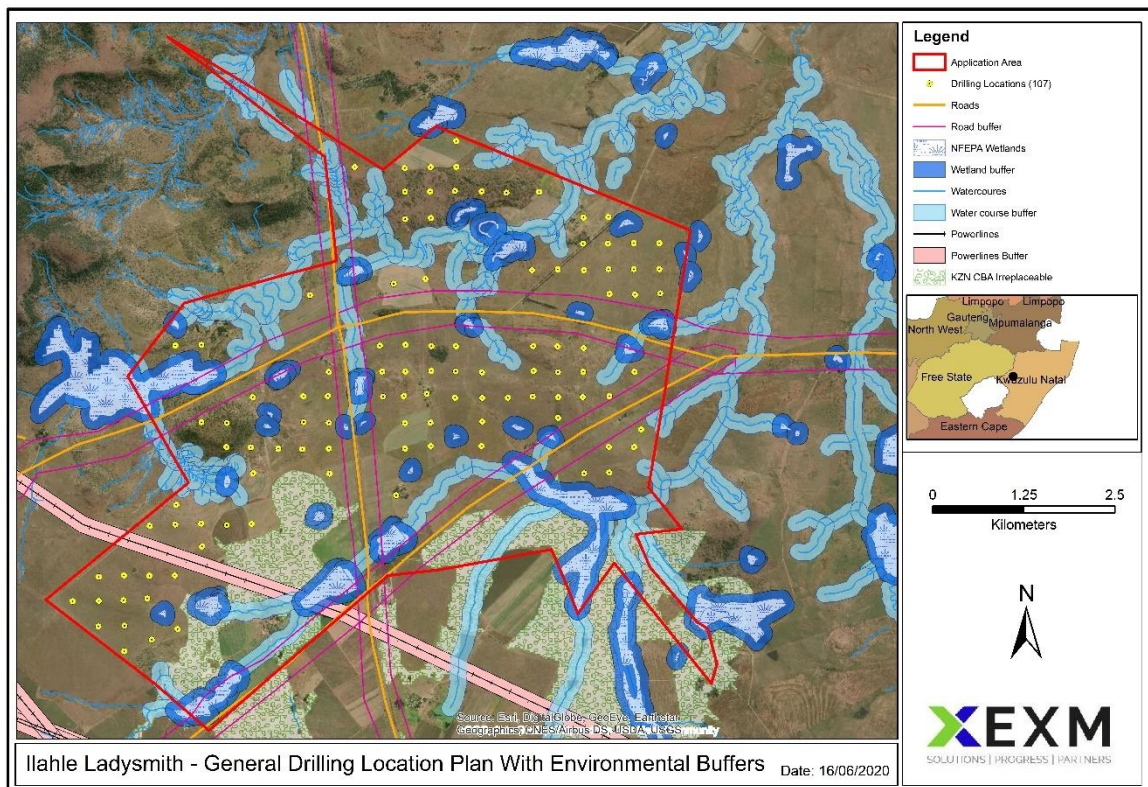


Figure 15 : Drill Site Map

- (d) **Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.**

The final closure and rehabilitation plan (**Appendix 6**) aims to provide a project site that is similar to the pre-prospecting environment through the removal of infrastructure, capping of boreholes and re-vegetating of disturbed areas (where not within cultivated lands). The closure plan makes provision for the re-shaping and stabilisation of the sites to ensure a safe environment for communities. The rehabilitation plan is therefore aligned with the closure objectives.

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

The total provision amounts to the number of holes requiring rehabilitation at any given moment. This ensures that should the project application become insolvent prematurely the costs of rehabilitation can be recovered. Existing roads will be used as far as possible and it is not possible to identify any new access roads at this stage as the routes will be determined in conjunction with the landowner and activities on the property at that time. No other infrastructure, offices or housing, will be present within the prospecting area and all employees will be housed in nearby towns. The quantum as calculated using the Department's guideline as provided in the Table below.

Ilahle 4 KZN Ladysmith Prospecting Right Application							
Company:	Ilahle 4 KZN (Pty) Ltd						
Mining Right:	KZN 30/5/1/1/2/10919 PR						
Application area:	Ladysmith						
Prepared by:	EXM Advisory Services (Pty) Ltd						
Item	Description	Calculation per borehole			Calculation for all applicable bore		Comments
		Unit	Quantity	Rate	Boreholes	Amount	
1	Sealing of borehole with cement	Cement seal	1	R 2 700,00	6	R 16 200,00	Based on contractor costs per borehole. Only three sites have boreholes present.
2	General surface rehabilitation						
2,1	Travelling to site	Travelling cost	700	3,61		R 2 527,00	Based on AA rates
2,2	Physical removal of weeds and invasive species	Man hours	5	R 250,00	6	R 7 500,00	Assume 5 man hours per site including removal.
2,3	Disposal of removed plants	Kg	300	R 0,50	6	R 900,00	Rate based on municipal rate for waste disposal.
2,4	Insitu remediation of hydrocarbon spills	20kg bag absorbent material	1	R 395,00	6	R 2 370,00	According to actual cost of product
2,5	Removal of drill sludge residue	Man hours	6	R 250,00	6	R 9 000,00	Assume 6 man hours per site, including removal.
2,6	Disposal of sludge residue (travelling)	Kg	500	R 0,50	6	R 1 500,00	Rate based on municipal rate for waste disposal.
2,7	Ripping of compacted areas	Man hours	5	R 250,00	6	R 7 500,00	Assume 5 man hours per site
2,8	Fertilization and seeding	Seed mix and fertiliser	1	R 1 650,00	6	R 9 900,00	Purchase and placement of organic compost or artificial fertiliser (1 m3 per site)+ 4 man hours per borehole+ transport
2,9	Brushpacking	Man hours	5	R 250,00	6	R 7 500,00	Assume 5 man hours on site

Ilahle 4 KZN Ladysmith Prospecting Right Application							
Company:	Ilahle 4 KZN (Pty) Ltd						
Mining Right:	KZN 30/5/1/1/2/10919 PR						
Application area:	Ladysmith						
Prepared by:	EXM Advisory Services (Pty) Ltd						
Item	Description	Calculation per borehole			Calculation for all applicable bore		Comments
		Unit	Quantity	Rate	Boreholes	Amount	
3	Placement of drill socks to soak any hydrocarbons	Per absorbent sock	2	R 980,00	6	R 11 760,00	Assume 2 drill sock per hole is required.
4	Monitoring and maintenance of rehabilitated sites including:						
4,1	Site inspection	3,61	700			R 2 527,00	Based on AA rates
4,2	Ripping of compacted areas	Man hours	5	R 250,00	3	R 3 750,00	Assume 5 man hours per site
4,3	Physical removal of weeds and invasive species	Man hours	5	R 250,00	3	R 3 750,00	Assume 5 man hours per site including removal.
4,4	Disposal of removed plants	Kg	300	R 0,30	3	R 270,00	
4,5	Fertilization and seeding	Seed mix and fertiliser	1	R 1 650,00	3	R 4 950,00	Purchase and placement of organic compost or artificial fertiliser (1 m ³ per site)+ 4 man hours per borehole+ transport
SUB TOTAL (Items 1-5)						R 91 904,00	
						Add 15% VAT	R13 785,60
GRAND TOTAL (INCL. VAT)						R105 689,60	

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

The applicant, Ilahle 4 KZN (Pty) Ltd, hereby commits to undertaking to provide the calculated amount of **R 91 904,00 (excl VAT)** in terms of the financial provisioning regulations, 2015 Published under Government Notice R1147 (GN R. 39425 of 2015).

Mechanisms for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon, including

- c) Monitoring of Impact Management Actions
- d) Monitoring and reporting frequency
- e) Responsible persons
- f) Time period for implementing impact management actions
- g) Mechanism for monitoring compliance

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
Camp site establishment	Disturbance of vegetation Hazardous substance spillage Noise and dust generation	Pre-site establishment and approval by EO Hazardous substance handling, storage and spill management audit Complaint register	Project environmental officer Site manager Project environmental officer	Prior to site establishment (once off) During operations and closure (monthly) During operations and closure (continuous)
Drill site establishment, moving and rehabilitation	Disturbance of vegetation Contamination of ground and surface water Disturbance of heritage resources	Pre-site establishment risk assessment Visual assessment Pre-site establishment risk assessment Pre-site establishment risk assessment	Project environmental officer Project environmental officer Project environmental officer	Prior to site establishment (once off) During operations and closure (bi-monthly) Prior to site establishment (once off)

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
	<p>Land use conflicts</p> <p>Noise and dust generation</p> <p>Rehabilitation sustainability</p>	<p>Complaint register</p> <p>Rehabilitation closure report</p>	<p>Project environmental officer</p> <p>Project environmental officer</p> <p>Project environmental officer</p>	<p>Prior to site establishment (once off)</p> <p>During operations and closure (continuous)</p> <p>Post closure</p>
Entire operational site	All activities and impacts identified	Auditing all site activities in compliance with the management commitments	Project environmental officer	During life of project (monthly)

h) Indicate the frequency of the submission of the performance assessment/ environmental audit report.

A performance assessment will be undertaken as stipulated in the Environmental Authorisation or relevant legal requirements. The performance assessment will be conducted by an external consultant throughout the life of prospecting as required under NEMA. This is conducted to assess the adequacy and compliance to the EMP, EA and any additional relevant legislation.

i) Environmental Awareness Plan

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

The Environmental Manager, Site Manager and Prospecting Manager must be conversant in environmental legislation, with special reference to the MPRDA, NEMA and the NWA.

The contractor / driller will be responsible for training its staff in terms of general environmental awareness. This will include basic training on the contents of this EMP; and will be conducted prior to commencement of prospecting activities. The aim of the environmental awareness training will be to highlight the potential impacts of the prospecting activities, and to highlight no-go areas.

The contractor / driller will ensure that records are kept of all training sessions / inductions. The Environmental Manager will monitor these records and undertake regular follow ups.

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

Training, as detailed above, will address the specific measures and actions as listed in the EMP and also conditions of the EA. In this way the prospecting team will be provided the knowledge required to conduct the prospecting activities without resulting in environmental non-compliance, the liability of which would lie with Ilahle. Secondly, informing the prospecting team of the EMP will also assist the team in identifying if an impact is likely to occur / has occurred and communicate this appropriately to the Environmental Manager.

In order for appropriate action to be taken, a proper communications network and reporting protocol must be established, with the prospecting team and the site manager reporting all environmental issues to the Environmental Manager and the all social issues to the Social Manager.

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

- None specified

2) UNDERTAKING

The EAP herewith confirms

- a) the correctness of the information provided in the reports
- b) the inclusion of comments and inputs from stakeholders and I&APs ;
- c) the inclusion of inputs and recommendations from the specialist reports where relevant;
and
- d) that the information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected. parties are correctly reflected herein.



Signature of the environmental assessment practitioner:

EXM Advisory Services (Pty) Ltd

Name of company:

2020/02/16

Date:

Appendices

- Appendix 1: EAP CV
- Appendix 2.1: IAP Database
- Appendix 2.2: Notification Letter of Project
- Appendix 2.3: Proof of Site Notices
- Appendix 2.4: Proof of Newspaper Advert
- Appendix 2.5: Notification letter of BAR review
- Appendix 2.6: Comments and responses
- Appendix 2.7: Communication with ward councillor
- Appendix 2.8: Notification of extended PPP consultation period
- Appendix 3: Environmental Impact Assessment
- Appendix 4: Final Drill Site Layout
- Appendix 5: Supplementary Environmental Management Plan
- Appendix 6: Final Rehabilitation, Decommissioning and Mine Closure Plan
- Appendix 7: Latent Environmental Risk Report.

-END-

APPENDIX 1: EAP CV

Curriculum Vitae Trevor Hallatt



Profession: Environmental Consultant

Education: Masters Degree in Environmental Management

Registrations/
Affiliations: South African Council for Natural Scientific Professions
Registration nr: 300123/15

Experience 9 years

ID number: 8706245033083

Contact nr. +27 82 674 1392

E-mail address twhallatt@gmail.com

Specialisation: Environmental Impact Assessments; Environmental Management Programmes; Waste Licence Applications; Water Use Licence Applications; Atmospheric Emissions Licence Applications; Environmental Legal Auditing; Environmental Management System Implementation and Audits.

1. Expertise

Trevor Hallatt has been involved in the field of environmental management for the past 9 years. His expertise includes:

- Environmental Impact Assessment, including full EIA and Scoping as well as Basic Assessments;
 - Generation of Environmental Management Programmes;
 - Water Use Licence Applications, Waste Management Licence Applications and Atmospheric Emissions Licence Applications;
 - Legal Compliance Management and Environmental Control Officer related duties;
 - Auditing of Environmental Authorisations;
 - Working Experience in Geographical Information Systems;
 - Environmental Management System (ISO 14001) Audits and Implementation;
 - Environmental Risk Assessment;
 - Public and government consultation; and
 - Short course development and presentation.
-

2. Employment Record

- 2015 – present:

Zantow Environmental Consulting Services (Senior Environmental Consultant)

- 2010 – 2014

Centre for Environmental Management (North-West University) (Junior Environmental Consultant)

3. Education

- B.Sc. Degree in Geography, Zoology and Tourism
- Honours degree in Environmental Management (obtained best student award)
- Masters Degree in Environmental Management (*Cum Laude*)
- Short courses (Risk Assessment, Environmental Control Officer, EMS, Auditing, Environmental Legislation, Rehabilitation)

4. Publications:

HALLATT, TW, RETIEF, FP and SANDHAM, LA. (1989): "The Quality of Biodiversity Inputs to EIA in Areas with High Biodiversity Value — Experience from the Cape Floristic Region, South Africa". *Journal of Environmental Assessment Policy and Management (JEAPM)* 2015; 17(3): 1-26.

5. Experience

5.1 Environmental Assessment Practitioner

Acted as Environmental Assessment Practitioner (EAP) for the legal processes to obtain Environmental Authorisations for the following projects:

- Vereeniging Refractories Elgin Operations Waste Management Licence;
- Vereeniging Refractories Hammanskraal Waste Management Licence and EMPr amendment;
- ArcelorMittal full EIA and Scoping as well as BAR for the decommissioning of the Existing Metallurgical Disposal Site and the Construction of a New Class B Disposal Site;
- Pinnacle Metals Waste Management and AEL application;
- Bumatech Expansion Project Basic Impact Assessment Process;
- TerraNova Ceramics Atmospheric Emissions Licence and full EIA;
- Ceramic Industries Warehouse Development Basic Impact Assessment;
- Ceramic Industries Phoenix Factory Atmospheric Emissions Licence and full EIA;
- ArcelorMittal Vanderbijlpark Galvanising Line Conversion to Combi-Line Basic Impact Assessment;
- Universal Oil Solutions Waste Management Licence Application;
- Review of Various Mining Prospecting Basic Assessment Applications;
- NEMA Section 24G Applications for the Eco Energy Trading Roodekop and Brakpan Sites;
- Basic Assessment for the Development of a Coal Siding near Bronkhorstspuit;
- Full EIA for a Photovoltaic Solar facility near Middleburg, Eastern Cape;
- Involved in 15 Waste Management Licence Applications for landfill sites across the North-West Province;
- Involved in the Atmospheric Emissions Licence Application and full EIA for a Medical Waste Incinerator in Waltloo, Pretoria.
- Columbus Stainless Basic Assessment for the Storage of Hazardous Substances (current); and
- SA Tank Terminals Waste Management Licence Application.

5.2 Water Use Licence Applications

- Ceramic Industries Phoenix, Samca and Gryphon Factories (respective);
- Cape Gate Vanderbijlpark; and
- Danone Southern Africa (current).

5.3 Environmental Compliance Auditing

Conducted audits to assess compliance to a variety of Environmental Authorisations for the following organisations:

- ArcelorMittal Vanderbijlpark, Vereeniging and New Castle;
- AfriSam Vanderbijlpark;
- Retromin Refractories in Meyerton;
- Cape Gate;
- Bumatech;
- Future Coal;
- Mooiriver Mall in Potchefstroom; and
- North-West University.

5.3 Environmental Management System (EMS) Auditing and Implementation

Conducted EMS Audits in terms of ISO 14001:2004/15 for the following organisations:

- AfriSam Vanderbijlpark and Roodekop;
- Camden and Tutuka Power Stations; and
- M-Tec Vanderbijlpark.

Involved in EMS implementation projects for the following organisations:

- Sishen Iron Ore Mine;
- AfriSam Vanderbijlpark and Roodekop (new ISO 14001:2015 standard); and
- Ceramic Industries Vereeniging.

5.4 Environmental Risk Assessment

- Assistance with closing out of risk/impact/aspect related findings (Camden Power Station)
- SHERQ risk register review and rectification for Assmang - Beeshoek Iron Ore Mine
- Environmental Risk Assessment in the Banking Sector (ABSA)
- Assisted in chemical risk assessments for Sishen Iron Mine and Koffiefontein Diamond Mine

5.5 Short Course Development and Delivery

Development of course material (presentations, programmes, course information sheets etc.) for various environmental management short courses and duties included the following:

- Acted as technical coordinator for short courses; and
- Presented on various topics at short course including
 - Biodiversity, soil, hazardous substances management
 - EMS and environmental risk assessment
 - Corporate governance
 - Environmental management tools

APPENDIX 2: PUBLIC PARTICIPATION

Appendix 2.1: IAP Database

Appendix 2.2: Notification Letter of Project

Appendix 2.3: Proof of Site Notices

Appendix 2.4: Proof of Newspaper Advert

Appendix 2.5: Notification letter of BAR review

Appendix 2.6: Comments and responses

Appendix 2.7: Communication with ward councillor

Appendix 2.8: Notification of extended PPP consultation period

Appendix 2.1: IAP Database

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
Landowners						
GREEN H RANCHES CC (Justin Green)		Marias Heuvel No. 2947-GS ptn 0, ptn 1, Marias Heuvel No. 13 247-GS ptn 0, ptn 1, ptn 8, Krantz Kloof No. 1245-GS ptn 2, Smalhoek No. 1282- GS ptn 4, ptn 7	(078) 802 0598 or (078) 802 0600	chris@middledale.co.za; justin@middledale.co.za		SMS and Email
GREEN ALAN JEREMY (Carol)		Marias Heuvel No. 13 247-GS ptn 2, ptn 3, ptn 10, ptn 12	(082) 802 7005	info@kwanalu.co.za; carol@harmonyfarm.co.za		SMS and Email
THE SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED. Dumisane Nkabinde	Regional manager	Marias Heuvel No. 13 247-GS ptn 4, 14, 15, ptn 16, Smalhoek No. 1282- GS ptn 21, 22, 25, and 26		NkabindeD@nra.co.za	532 LEANDER RD, OLYMPUS, FAERIE GLEN, 81	Email
THE SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED (Mr Mlambob)			(083) 516 3084	mlambob@nra.co.za	532 LEANDER RD, OLYMPUS, FAERIE GLEN, 81	Email and sms
KWANTABAMNY AMA COMMUNITY TRUST-TRUSTEES		Marias Heuvel No. 13 247-GS ptn 20				Site notices Communication with ward councillor – whom conveyed the message.
BOYABENYATHI FAMILY TRUST		Marias Heuvel No. 13 247-GS ptn 22				Site notices Communication with ward

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
						councillor – whom conveyed the message.
ARNUT HILL PTY LTD		Krantz Kloof No. 1245-GS ptn 3	(082) 923 6321	-		SMS
DAVIES NORMAN ARRAS (Elnor Davies)		Krantz Kloof No. 1245-GS ptn 8	(082) 451 6242	elnordavies@gmail.com		SMS and Email
TUGELA FARMS CC (Bryan Drew/Jane Alice Drew)		Smalhoek No. 1282- GS ptn 2, ptn 11, Weston No. 2365-GS ptn 0, Recompense No. 4790-GS, Arcadia 2179-GS ptn 1	(082) 923 6321	bdrew@mweb.co.za; drbryandrew@gmail.com; janealicedrew@gmail.com		SMS and Email
STRACHAN JOHANNES JACOBUS		Smalhoek No. 1282- GS ptn 3, Voorslag No. 8338-GS ptn 0, ptn 2	(084) 255 5330	strachanboerdery@gmail.com		SMS and Email
R S A		Arcadia 2179-GS ptn 6				Various departments informed
Commenting Authorities						
Sandile Njapha	Department of Mineral Resources			sandile.njapha@dmr.gov.za		Email
SS Kubheka	Alfred Duma Local Municipality		(074) 768 1067	sekubheka@alfredduma.gov.za		SMS and Email
MM	Alfred Duma Local Municipality			mm@alfredduma.gov.za		Email
Samke Msibi	Okhahlamba Local Municipality			samke.msibi@okhahlamba.gov.za		Email
Paul Sigubudu	Okhahlamba Local Municipality			paul.sigubudu1@gmail.com		Email
Hlengiwe Ndaba	Okhahlamba Local Municipality			Hlengiwe.Ndaba@okhahlamba.gov.za		Email

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
Sbongile Zikalala	Okhahlamba Local Municipality			sbongile.zikalala@okhahlamba.gov.za		Email
	Uthukela District Municipality			mayor@uthukeladm.co.za		Email
MM	Uthukela District Municipality			mm@uthukeladm.co.za		Email
Mthalane A	Department of Water and Sanitation (KZN)			MthalaneA@dw.gov.za		Email
Bernadet Pawandiwa	AMAFA			bernadertp@amafapmd.co.za		Email
Bheki Mbili	Land Restitution Commission			bheki.mbili@drdlr.gov.za		Email
Bhekumuzi Mathenjwa	Department of economic Development, Tourism and Environmental Affairs		(082) 822 2496	bhekumuzi.mathenjwa@kznedtea.gov.za		SMS and Email
Amkela A/Thembalakhe Sibozana	Department of Agriculture, Forestry and Fisheries (DAFF)			AmkelaC@daff.gov.za ThembalakheS@daff.gov.za		Email
Rob Crankshaw	KZN Conservancies		(082) 900 9593	rob.crankshaw@amamarketing.co.za		SMS and Email
Shezi Mkhize	Kwazulu Department- Department of Agriculture and Rural Development		(082) 776 6296	hodpa@kzndard.gov.za ; hod.pa@kzndard.gov.za		SMS and Email
Jerry Mfusi	Department of Economic development ,Tourism and Environmental Affairs		(082) 419 2881	jerry.mfusi@kzndard.gov.za		SMS and Email

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
Sizile Mthalande	Department of Rural Development & Land Reform			sizile.mthalande@drdlr.gov.za		Email
Musa Mtambo	Ezemvelo KZN Wildlife			mtambom@kznwildlife.com		Email
Buhle Mzulwini	Department of Agriculture, Forestry and Fisheries (DAFF)			BuhleM@daff.gov.za		Email
Gerald Willissmith	DAEARD			gerald.willissmith@kzndae.gov.za		Email
Moonsamy Z	DWA		(082) 808 0208	moonsamyz@dwa.gov.za		SMS and Email
Dominic Weiners	EKZNW			weinersd@kznwildlife.com		Email
Mbali Mhlongo	Department of Human Settlement		(071) 298 0210	Mbali.mhlongo@kzndhs.gov.za		SMS and Email
Vanessa MacLough	KZN Department of Agriculture and Environmental Affairs			Vanessa.MacLough@kzndae.gov.za		Email
Douglas Zungu	Department of Rural Development & Land Reform		(082) 450 7525	douglas.zungu@drdlr.gov.za		SMS and Email
Lizzane Rungasamy	Commission on restitution on Land Rights			lizzane.rungasamy@drdlr.gov.za		Email
Jeffrey Maivha	Department of Agriculture, Forestry and Fisheries (DAFF)			jeffreyMAI@daff.gov.za		Email
Rodney Harrylal	Transnet		(083) 284 6274	Rodney.Harrylal@transnet.net		SMS and Email
Thabisile Sakyi	Department of Health			Thabisile.sakyi@kznhealth.gov.za		Email
Thando Tubane	Department of Cooperative		(082) 886 5451	thando.tubane@kzncogta.gov.za		SMS and Email

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
	Governance and Traditional Affairs					
Surrounding Farmers						
STRACHAN JOHANNES JACOBUS		Alexandria 2180 ptn 0, Blue bank 12887 ptn 1, Rooipoort 12905 ptn 1	(084) 255 5330	strachanboerdery@gmail.com		SMS and Email
JOHANNES STRACHAN TRUST-TRUSTEES		Alexandria 2180 ptn 1	(084) 255 5330	strachanboerdery@gmail.com		SMS and Email
SCHOEMAN PETRUS JOHANNES (Peter)		Brakfontein 2208 ptn 3, Groote hoek 1242 ptn 7	(082) 953 7740	wtsrob004@uct.ac.za; peter@brakfonteinfarm.co.za		SMS and Email
ARNUT HILL PTY LTD		Driehoek 2247 ptn 0, Krantz kloof 1245 ptn 1	(082) 923 6321	-		SMS
GREENDALE AGRICULTURAL PROPERTY PROPRIETARY LIMITE (G Green)		Kranskloof 13091 ptn 1, ptn 4	(082) 292 2314	ggreen@futurenet.co.za		SMS and Email
GREEN H RANCHES CC (Justin Green)		Kranskloof 13091 ptn 2, Smalhoek 1282 ptn 8, ptn 9, ptn 10, ptn 14	(078) 802 0598 or (078) 802 0600	chris@middledale.co.za; justin@middledale.co.za		SMS and Email
DAVIES NORMAN ARRAS		Krantz kloof 1245 ptn 7	(082) 451 6242	elnordavies@gmail.com		SMS and Email
WATSON ALLAN GORDON		Riet kuil 1067 ptn 1	(083) 627 8484	allan@mimtams.co.za brian@mimtams.co.za		SMS and Email
NATIONAL GOVERNMENT OF THE REPUBLIC OF SOUTH AFRICA	Various departments informed	Riet kuil 1067 ptn 3				SMS and Email
NDLELA TEMBA SOLOMON		Riet kuil 1067 ptn 20	(072) 668 5508	-		SMS

Ladysmith IAP List						
Name and surname	Department	Farm and portion	Cell	Email	Address	Notification method
(KUMALO WILFRED CYPRIAN TOSI)						
LAW GAVIN PINKNEY (Sonja Law)		Smalhoek 1282 ptn 5	(083) 292 6219	sonjalaw4@gmail.com		Email and SMS
BLOSWETEA PROPRIETARY LIMITED (SUSAN MARY WATSON)		Stockville 2027 ptn 1	(083) 645 6444	-	1 MIMTAMS FARM, LADYSMITH, 3370	SMS
GOLDSCHAGG HERMAN ALFRED		ARCADIA 2179-GS ptn 3	(082) 873 5983			SMS
NTOKOZWENI DEVELOPERS CC		KLIP POORT GS 1082 Pt 15		info@ntokozweni.co.za		Email
PHEKAPHANSI TRADING ENTERPRISE PROPRIETARY LIMITED (Zwelakhei Mchunu)		ROODEPOORT	(072) 963 1010	zwelakhei.mchunu@gmail.com		Email and SMS
RIVER WEST TRADING PTY LTD		ROODEPOORT	(083) 786 3113	sb4786zn@gmail.com		Email and SMS
BLOSWETEA PROPRIETARY LIMITED (Logan)		STOCKVILLE 2027 Pt 1	(036) 631 3772	logan@occusure.co.za		Email and SMS
Phillip Mkhasibe			(073) 652 8904	pmkhasibe@metropolitan.co.za		Email and SMS
COPELAND HEATHER DAWN		Afsaal 15067 ptn 0			POOTENEAS SPRUIT, BLUE BANK, LADYSMITH, 3370	Registered mail sent
Interested parties						
Jennifer de Villiers				jennifer.devilliers1@gmail.com		Email

ILANHLE 4 KZN (PTY) LTD

Appendix 2.2: Notification Letter of Project

Date: 29/11/2019

ATTENTION: INTERESTED & AFFECTED PARTIES
REF: KZN 30/5/1/1/2/10919 PR

Dear Sir/ Ma'am

ILAHLE 4 KZN (PTY) LTD

NOTICE OF BASIC ENVIRONMENTAL IMPACT ASSESSMENT **APPLICATION FOR A PROSPECTING RIGHT FOR COAL, PSEUDOCOAL and** **limestone, near Ladysmith, Kwazulu Natal province**

Introduction

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) has submitted a prospecting right application for coal, Pseudocoal and limestone approximately on various farms approximately km west of Ladysmith. The properties included in the prospecting right application are illustrated in Figure 1 below.

Prospecting activities require environmental authorisation in terms of Section 24 of the National Environmental Management Act No 107 of 1998 (NEMA) prior to commencement. A Basic Assessment Process in terms of Section 19 of Environmental Impact Assessment (EIA) Regulation 982, 2014 of NEMA will need to be undertaken in support of the environmental authorisation application. In addition to environmental authorisation, a prospecting right in terms of the Mineral and Petroleum Resources Act No 28 of 2002 needs to be obtained prior to commencement.

Ilahle 4 KZN has submitted the prospecting right and environmental authorisation application to the Department of Mineral Resources (KwaZulu Natal) which have been assigned Reference (KZN 30/5/1/1/2/10919 PR).

EXM Advisory Services has been appointed as an independent Environmental Assessment Practitioner, responsible for undertaking the Basic Assessment and Public Participation Process on behalf of the applicant Ilahle 4 KZN (Pty) Ltd.

Purpose

This document serves to:

- Notify you of the application for authorisation.
- Describe the environmental assessment process.
- Inform you how you can provide input into the process.

Your Role

As an interested and affected party, your role is to:

- Ask questions, raise issues and concerns.
- Review and provide comment on environmental reports.

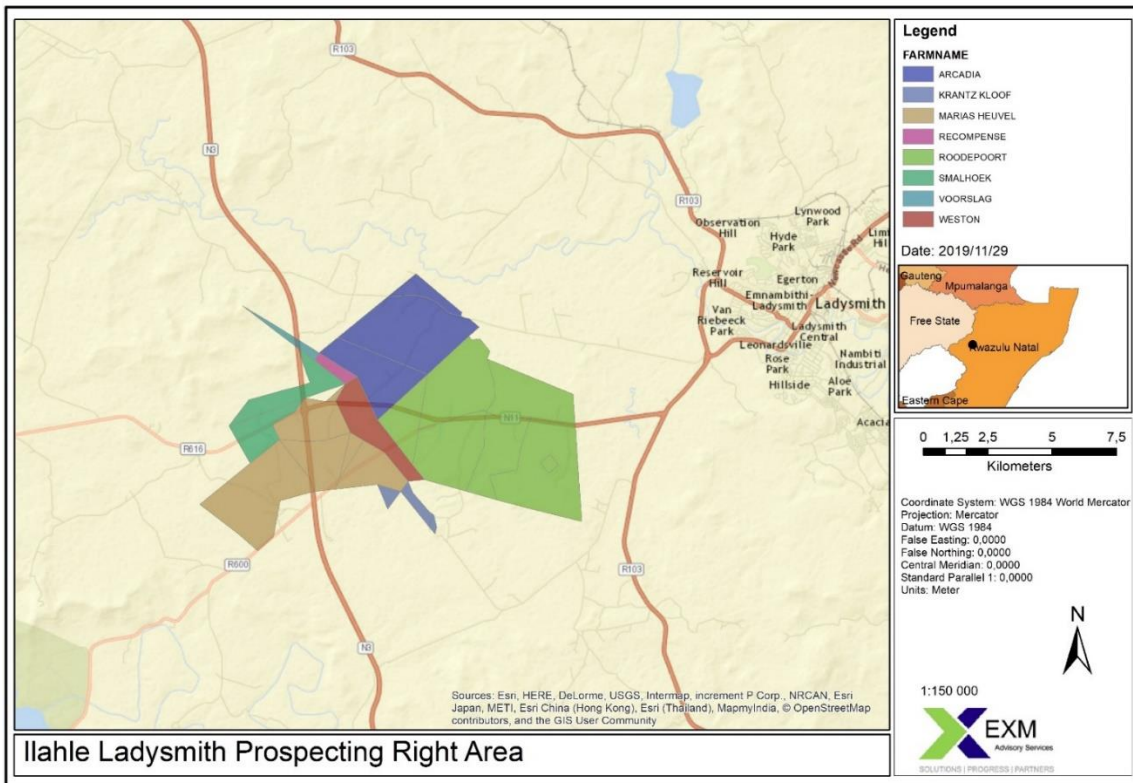


Figure 1: Location of the Prospecting Right Application Area

what does the PROSPECTING ACTIVITIES INVOLVE?

Ilahle 4 KZN (Pty) Ltd proposed to undertake prospecting activities in three phases over a period of 4 years. The different phases (a-c) are illustrated below and explained further.



The prospecting right will likely be valid for five (5) years, after which the right holder has the option to extend it for a further three (3) years.

Desktop Study

The desktop study will be undertaken which will involve the review of historical data from the Council of Geoscience. The purpose of the desktop study is to determine the presence of coal, pseudocoal and limestone within the area and its surrounds. A geomagnetic survey will then be undertaken to determine the presence of igneous intrusions. The survey will make use of handheld magnetometer (no site disturbance) to determine changes in the earth's magnetic field. Readings will be taken every 20m (min) along traverse lines. Upon completion of the survey and desktop assessment, the drilling programme will be developed to further analyse the geology of the area.

Site Drilling

It is proposed that 15 core boreholes will be drilled at predetermined locations. Site drilling is an invasive activity and will involve mobilisation of one (1) drill rig (see Plate 1) that is accompanied by approximately six personnel to operate the rig. The total area of the prospecting right is approximately 2 846 hectares while the drill site footprint is generally smaller than 500 m². The drilling method will be diamond drilling. A 60mm diameter core drill will be used to drill geological boreholes. It is anticipated that drilling will last for 48 months but this depends on the outcomes and the rock samples.



Plate 1: Typical Drill Site

Geological cores as shown in Plate 2 will be logged and potential viable seam sent for initial raw analysis. Further specialised analysis may be conducted for Ash Fusion Temperature, Abrasive Index, Hardgrove Grindability Index, Ash Analysis and Ultimate Analysis.



Plate 2: Geological Core Samples from Prospecting Drilling

Reporting

Data collected during the desktop and core drilling phase will be processed, modelled and analysed by technical consultants. Reporting is not an invasive site activity and will be conducted by consultants in their offices. A competent person's report will be submitted to Ilahle 4KZN on conclusion of prospecting activities. The reporting stage may advise further drilling to take place and the three-stage process will be repeated during the lifespan of the prospecting right. A renewal for the prospecting right may also be applied for.

The report will be used to determine the economic pre-feasibility of the project. Should it show favourable results, the project will proceed to the mining right application phase.

BASIC ASSESSMENT PROCESS

A Basic Assessment is a study that is undertaken to determine the effect that the planned prospecting activities will have on the environment and surrounding communities.

Basic Assessment Process

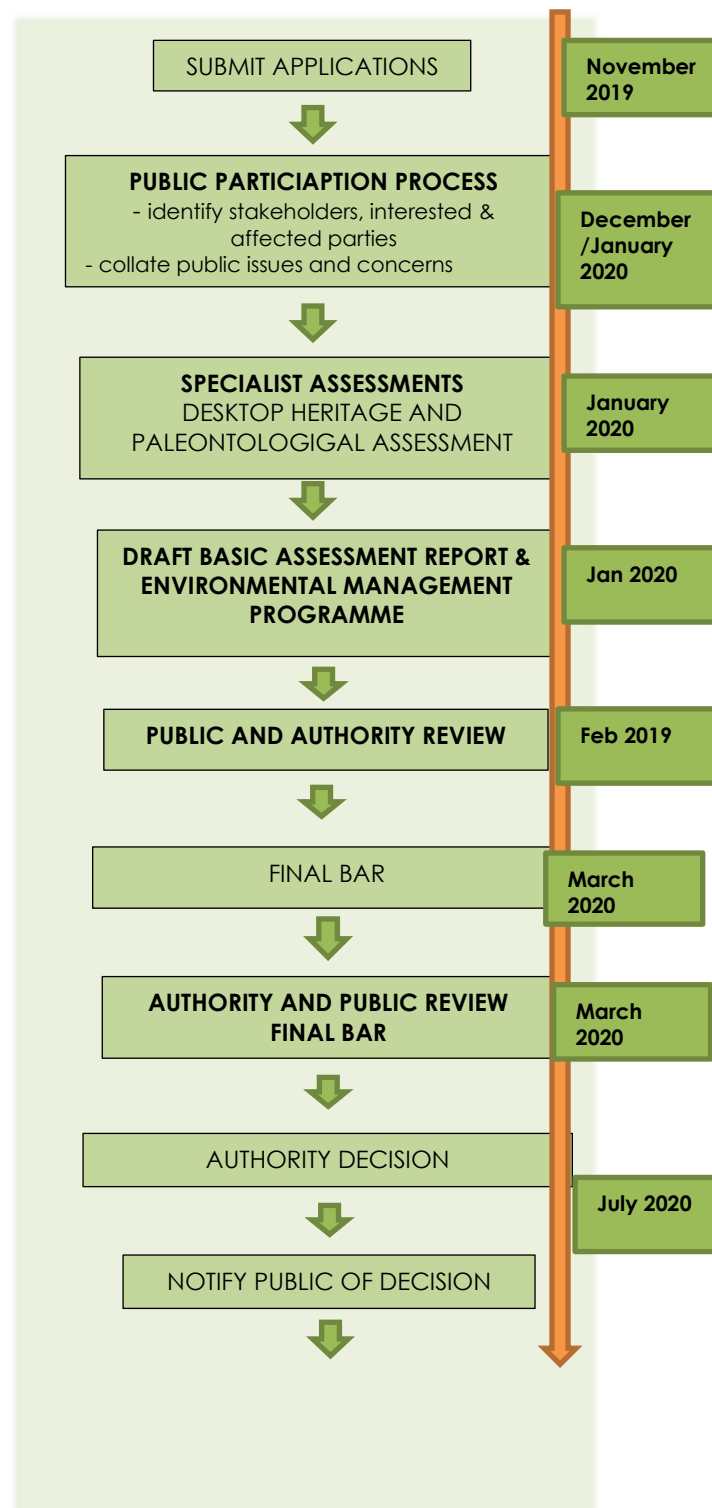
The Basic Assessment Process involves the identification of the project impacts taking into consideration issues raised by the Interested and Affected Parties (IAPs) and specialist (where applicable). IAPs are identified during the public participation process which involve notifications and advertisements.

Specialist studies are also undertaken during this process to provide expert opinion on the likely impacts and often use computer modelling to assist with their studies. It is anticipated that a desktop heritage and paleontological study will be undertaken for this project.

The findings of the impact assessment and the proposed measures identified to mitigate such impacts will be documented in the Basic Assessment Report. The findings are circulated to IAPs for review. IAPs will be notified via post, fax or email when the draft report is available for public comment

Environmental Management Programme

An EMP will aim at addressing impacts identified and reducing risks to acceptable levels. Recommendations of the specialists are used to assist in developing the management programme. The EMP will be made available for public review together with the BAR.



public participation process

Interested & affected parties (IAPs) are invited to participate in the environmental process.

You can provide input by:

- Registering as an IAP
- Asking questions and raising initial concerns by completing and returning the response sheet (attached)
- Reviewing and providing comment on the Basic Assessment Report
- Reviewing environmental authorisations

Should your issues and concerns not be addressed through the process, you also have the opportunity to appeal should environmental authorisation be given.

Should you have questions or require more information, **please contact:**

Zama Khumalo

Ilahle 4 KZN (Ladysmith)

EXM Advisory Services

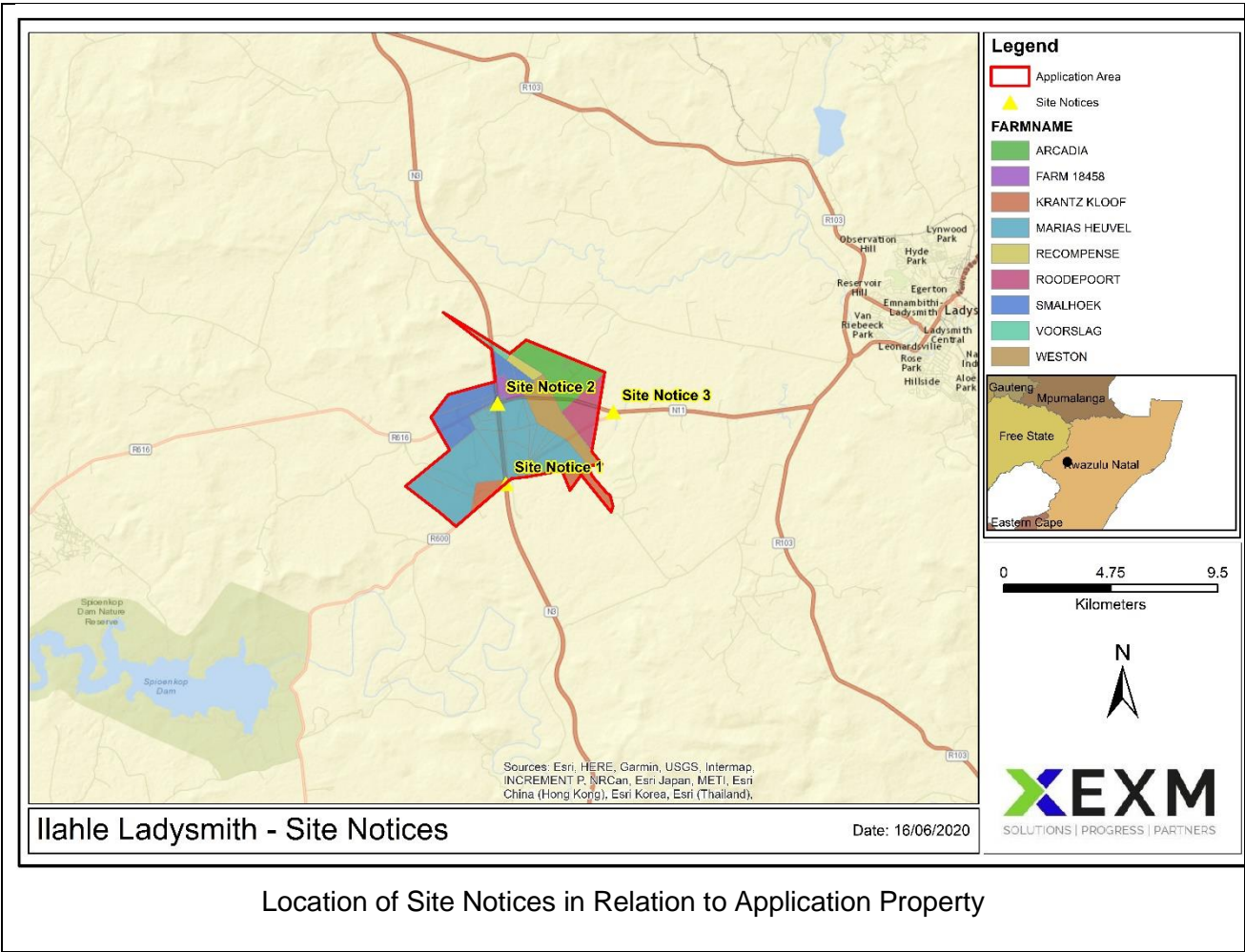
Cell: 067 266 1238 Office: 010 007 3617

Fax: 086 616 0443 Email: zama@exm.co.za

PO Box 1822, Rivonia, 2128

All comments, issues and concerns will be incorporated into a basic environmental impact assessment report for consideration by the Department of Mineral Resources.

Appendix 2.3: Proof of Site Notices



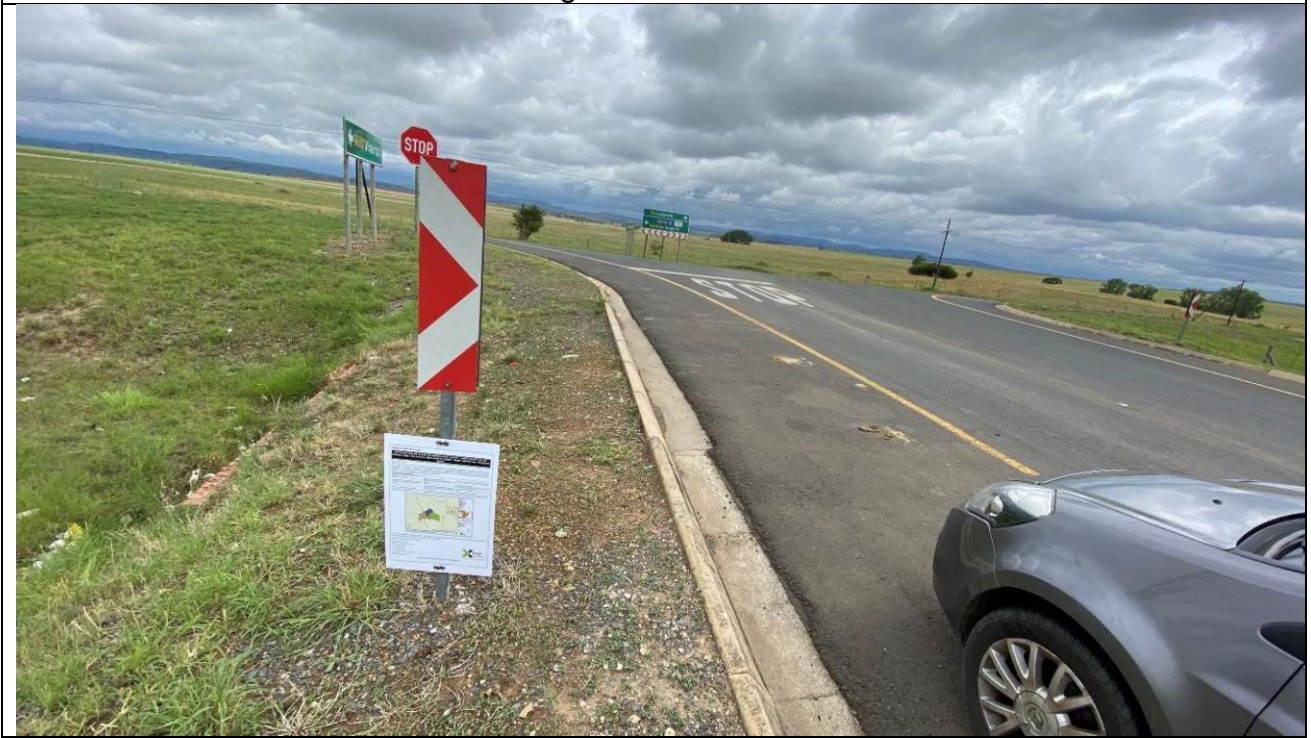
Site Notice 1 at N3 and R600 crossing



Site Notice 2 at N11 and N3 crossing



Site Notice 3 at N11 and R600 crossing



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 AM010097

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0900
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0750
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COMPUTERS

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LEGAL NOTICES

NULANE INVESTMENTS 254 (PTY) LTD
 2010/002717/07:
APPLICATION TO DEVELOP A 133 BED ACUTE HOSPITAL IN LADYSMITH

The directors of NULANE INVESTMENTS 254 (PTY)LTD hereby give notice to the community of Ladysmith of an application to be lodged with the Dept. Of Health KwaZulu-Natal for the Development of the 133 bed acute hospital in Ladysmith (PORTION OF REMAINDER ERF 1 LADYSMITH KNOWN AS THE INDOOR MIXED-USE DEVELOPMENT WITHIN THE ALFRED DUMA MUNICIPALITY)

Enquiries may be directed to: Nana Baloyi (Nana.baloyi@icembe.co.za)
 Objections may be lodged directly to the Dept. Of Health to: Ms Pearl Kunene on email pearl.kunene@kznhealth.gov.za
 Please note that objections may only be lodged within 21 days of the date of publication of this notice.

Estate Notice
FIRST AND FINAL LIQUIDATION AND DISTRIBUTION ACCOUNT IN THE ESTATE OF THE LATE DHEERAJ SINGH IDENTITY NUMBER 691027 5213 08 4, FORMERLY OF 13 MILKWOOD ROAD, LADYSMITH, 3370, KWAZULU-NATAL, WHO DIED ON 2018-09-12, MARRIED, MASTER'S REFERENCE NUMBER 007504/2018/PMB. Notice is hereby given that copies of the First and Final Liquidation and Distribution Account will lie open for inspection for all persons interested therein, for a period of TWENTY ONE (21) DAYS as from the date of publication at the office of the Master of the High Court at PIETERMARITZBURG and the Magistrate's Offices at LADYSMITH. Should no objection thereto be lodged within the prescribed time period, the Executor will proceed to make payment in accordance therewith. **Attorneys for the Executor, JUSTIN HEUNIS & CO, P.O. BOX 387 / 5 POORT ROAD, LADYSMITH, 3370.**

First and Final Liquidation and Distribution Account in the Deceased Estate lying for Inspection
Estate Number: 2846/2019/PMB
 In terms of section 35(4) and (5) of Act 66 of 1965, Notice is hereby given that copies of the First and Final Liquidation and Distribution Account in the Estate of the late KHADIJA KATHRADA, IDENTITY NUMBER: 261108 0040 08 4, who died at LADYSMITH on the 26 MAY 2012 and who was unmarried, will lie open for inspection for all persons with an interest therein at the Magistrates Court, Ladysmith and at the offices of the Master of the High Court, Pietermaritzburg, for a period of twenty one (21) days from the date of publication hereof. Should no objection thereto be lodged with the Master concerned during the specified period, the executors will proceed to make payments in accordance with the accounts. **Attorneys for Executor, Attorneys Farouk Khan, 64 CONVENT ROAD, P.O. BOX 4111, LADYSMITH, 3370. Ref: MR KHAN / SHAINAZ**

LEGAL NOTICES

NOTICE TO CREDITORS IN TERMS OF SECTION 29 OF THE ADMINISTRATION OF ESTATES ACT NO. 66 OF 1965

In the estate of the late **MTOBI REBECCA RADEBE**, Identity number 250704 0105 084, formerly of A1071 NYALA STREET, EZAKHENI, who died on 2 DECEMBER 2018. Estate Number: 6895/2019 and who was unmarried. All persons having claims against the above mentioned estate are required to lodge their claims with the undersigned within THIRTY (30) days after the date of publication hereof. Name and address of the Executor or Authorised Agent: **LUNGILE MERCY NHLANGOTHI c/o Christopher, Walton & Tatham Inc. 133 Murchison Street, P O Box 126, Ladysmith, 3370. REF: ANMAT12325.**

ILAHLE 4 KZN (PTY) LTD
NOTIFICATION OF BASIC ENVIRONMENTAL IMPACT ASSESSMENT FOR AN APPLICATION FOR A COAL PROSPECTING RIGHT NEAR LADYSMITH, KWAZULU NATAL PROVINCE

Ilahle 4 KZN (Pty) Ltd has submitted a prospecting right application for Coal, Pseudocoal and Limestone on various farms approximately 17 km west of Ladysmith in the KwaZulu Natal Province. Prospecting and its associated activities require an environmental authorisation in terms of Section 24 of the National Environmental Management Act, No. 107 of 1998, and is a listed activity (activity 20) of GNR 983 of the Environmental Impact Assessment Regulations, 2014. Notice is hereby given of a basic environmental impact assessment process being undertaken in support of the prospecting right application by Ilahle 4 KZN (Pty) Ltd.

You are hereby invited to register as an interested and affected party to receive further information on the project and to raise environmental issues and concerns. Interested persons can submit their contact details to:

ILAHLE 4 KZN (PTY) LTD (LADYSMITH)
 Attention: Zama Khumalo
 EXM Advisory Services (Pty) Ltd
 Tel: 067 266 1238
 Fax: 086 407 9911
 Post: PO Box 1822, Rivonia, 2128
 Email: zama@exm.co.za

PLEASE RESPOND TO THIS ADVERT BY 14 DECEMBER 2019

EXM
 Advisory Services
 SOLUTIONS | PROGRESS | PARTNERS

LIST OF AFFECTED PROPERTIES

Remainder of the Remainder of Portion 1 of the Farm Marias Heuvel No 2947GS
Remainder of Portion 4 of farm Smaalhoek No 1282GS
Portion 2,3,7,11,21,22,25 and 26 of Smaalhoek 1282GS
Whole area of the farm Reccompe 4790 GS
Portion 1 of Farm Arcadia No 2179 GS
Portion 1 of Farm Rooodepoort 1119GS
Portion 3, 4 and the Remainder of Farm Weston No 2365 GS
Whole area of the farm Marias Heuvel No 13247 GS
Portion of the remainder of Portion 2 of Farm Krantz Kloof No 1245GS
A Portion of Portion 3 of Farm Krantz Kloof No 1245GS
A Portion of Portion 8 of Farm Krantz Kloof No 1245GS
A Portion of Farm 18 458GS
A Portion of the Remainder and a Portion of Portion 2 of Farm Voorslag No 8338 GS
Portion 6 of Farm Arcadia 2179GS
Portion 10,16,29 and 30 of Farm Rooodepoort 1119GS

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Appendix 2.5a: Proof of Notification SMS

Phonenumber	Status	CreatedDate	CampaignName	SentData
27712980210	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27729631010	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27736528904	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27788020598	EXPIRED	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27788020600	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27822922314	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27824507525	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27824516242	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27827766296	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27828027005	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.

Phonenumber	Status	CreatedDate	CampaignName	SentData
27828080208	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27828222496	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27828735983	EXPIRED	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27828865451	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27829009593	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27829236321	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27829537740	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27832846274	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27832926219	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27836278484	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27836456444	DELIVRD	2020/02/21 11:37	Ladysmith sms	llahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or

Phonenumber	Status	CreatedDate	CampaignName	SentData
				0716892229 if you wish to register as a stakeholder or raise comments.
27837863113	DELIVRD	2020/02/21 11:37	Ladysmith sms	Ilahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.
27842555330	DELIVRD	2020/02/21 11:37	Ladysmith sms	Ilahle proposes to conduct coal prospecting activities 6km west of Ladysmith. A Basic Impact Assessment is conducted to obtain environmental authorisation for the project. Please contact us at trevor@exm.co.za or 0716892229 if you wish to register as a stakeholder or raise comments.

Appendix 2.5b: Proof of Notification and Distribution of BAR EMAIL

Zama Khumalo

From: Zama Khumalo
Sent: 09 December 2019 09:08
To: zwelakhei.mchunu@gmail.com; info@kwanalu.co.za; elnordavies@gmail.com; sb4786zn@gmail.com; chris@middledale.co.za; justin@middledale.co.za; bdrew@mweb.co.za; strachanboerdery@gmail.com; ntombi.maseko@arivia.co.za; mm@alfredduma.gov.za; govenders@dws.gov.za; bernadertp@amafapmd.co.za; bheki.mbili@drdlr.gov.za; bhekumuzi.mathenjwa@kznedtea.gov.za; thando.tubane@kzncogta.gov.za
Subject: Notification of Basic Environmental Process for Ilahle 4 KZN Prospecting Right Application
Attachments: Background Information Document Ladysmith Prospecting.pdf

Dear Interested and Affected Party,

Notice is herewith given that a Basic Assessment Process is currently being undertaken by EXM Advisory Services (Pty) Ltd for Ilahle 4 KZN's prospecting right application approximately 17 km west of Ladysmith. The basic assessment is being undertaken in terms of Section 19 of Environmental Impact Assessment (EIA) Regulation 982, 2014 of the National Environmental Management Act no 107 of 1998.

Please find attached to this email Background Information Document that provides further information on proposed prospecting activities. Should you have further questions or wish to raise issues of concern, please feel free to contact the undersigned and complete the attached response sheet. Comments should be given by 20 January 2020.

Regards,
Zama Khumalo
067 266 1238

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
To: mm@alfredduma.gov.za; govenders@dws.gov.za; bernadertp@amafapmd.co.za; bheki.mbili@drdlr.gov.za; bhekumuzi.mathenjwa@kznedtea.gov.za; AmkelaC@daff.gov.za; ThembalakeS@daff.gov.za; rob.crankshaw@amamarketing.co.za; hodpa@kzndard.gov.za; bheki.mbili@drdlr.gov.za; musa.mntamo@kznwildlife.com; hod.pa@kzndard.gov.za; BuhleM@daff.gov.za; gerald.willissmith@kzndae.gov.za; moonsamy@dwaf.gov.za; weinersd@kznwildlife.com; Mbali.mhlongo@kzndhs.gov.za; BuhleM@daff.gov.za; Vanessa.Macloj@kzndae.gov.za; douglas.zungu@drdlr.gov.za; lizzane.rungasamy@drdlr.gov.za; jeffreyMA@daff.gov.za; Rodney.Harrylal@tramsnet.net; Thabisile.sakvi@kznhealth.gov.za; thando.tubane@kzncogta.gov.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 13:25:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft.19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) proposes to conduct prospecting activities for coal, limestone and Pseudocoal on various properties approximately 6km west of Ladysmith, KwaZulu Natal. Prospecting and its associated activities require an Environmental Authorisation (EA) in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA). A Basic Environmental Impact Assessment (BA) process must be undertaken in support of the EA application.

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Hard copy: Hard copy at the Ladysmith Library (Murchison Street, Ladysmith)

Electronic copy: trevor@exm.co.za (on request)

If you wish to register as an Interested and/or Affected Party or raise any comments, please completed the attached comment sheet and return within **30 days** from this notification.

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@transnet.net)
To: [Rodney Harrylal@transnet.net](mailto:Rodney.Harrylal@transnet.net)
Subject: FW: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 13:30:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft.19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@vrakfonteinfarm.co.za)
To: peter@vrakfonteinfarm.co.za; chris@middledale.co.za; justin@middledale.co.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 13:45:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft 19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

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KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

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Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
Bcc: carol@harmonyfarm.co.za; ggreen@futurenet.co.za; sonjalaw4@gmail.com
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 14:04:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft.19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

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KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@brakfonteinfarm.co.za)
To: peter@brakfonteinfarm.co.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 14:44:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft 19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

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KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@sonjalaw4@gmail.com)
To: sonjalaw4@gmail.com
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 24 February 2020 13:17:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft.19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
Bcc: samke.msibi@okhahlamba.gov.za; Hlengiwe.Ndaba@okhahlamba.gov.za; sbonqile.zikalala@okhahlamba.gov.za; paul.sigubudu11@gmail.com
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 25 February 2020 09:09:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft.19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@alfredduma.gov.za)
Bcc: lbkubheka@alfredduma.gov.za; sekubheka@alfredduma.gov.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 02 March 2020 09:51:00
Attachments: [Comment sheet Ladysmith.docx](#)
[Ilahle Ladysmith Prospecting BAR and EMPr Draft 02032020.pdf](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
Bcc: jerry.mfusi@kzndard.gov.za; sizile.mthlane@drdlr.gov.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 02 March 2020 12:07:00
Attachments: [Comment sheet Ladysmith.docx](#)
[Ilahle Ladysmith Prospecting BAR and EMPr Draft.02032020.pdf](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

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PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@uthukeladm.co.za)
Bcc: mayor@uthukeladm.co.za; municipalmanager@uthukeladm.co.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 02 March 2020 12:36:00
Attachments: [Comment sheet Ladysmith.docx](#)
[Ilahle Ladysmith Prospecting BAR and EMPr Draft 02032020.pdf](#)

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KZN 30/5/1/1/2/10919 PR

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Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@uthukeladm.co.za)
To: mm@uthukeladm.co.za
Subject: FW: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 02 March 2020 12:39:00
Attachments: [Comment sheet Ladysmith.docx](#)
[Ilahle Ladysmith Prospecting BAR and EMPr Draft.02032020.pdf](#)

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KZN 30/5/1/1/2/10919 PR

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Kind regards

Trevor

From: [Trevor Hallatt](#)
To: [Trevor Hallatt](#)
Bcc: wtsrob004@uct.ac.za; peter@brakfonteinfarm.co.za; ggreen@futurenet.co.za; allan@mimtams.co.za; sonjalaw4@gmail.com; info@ntokozweni.co.za; zwelakheimchunu@gmail.com; st4786zn@gmail.com; logan@oocusure.co.za; pmkhasibe@metropolitan.co.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 02 June 2020 09:35:00

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

DMR reference: KZN 30/5/1/1/2/10919 PR

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION LADYSMITH, KWAZULU NATAL

Please note that that the public commenting period for the abovementioned project is currently on hold due to the national Covid-19 lockdown. EXM Advisory Services is continuously in communication with the Department of Mineral Resources and Energy regarding the status of the situation, including the timeframe at which they will recommence with the processing of applications. The progress of the application process will be communicated as soon as communication is received from the Department.

Please feel free to contact me in the interim if you have any comments or queries. Also, you are welcome to provide the details (name, cell nr or email address) of any person, including occupiers of the land, that you may deem important to notify of the project.

Kind regards

Trevor Hallatt

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

T: +27 (0) 10 007 3617

M: +27 (0) 71 689 2229

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From: [Trevor Hallatt](mailto:Trevor.Hallatt@varkfonteinfarm.co.za)
To: peter@varkfonteinfarm.co.za
Subject: FW: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 14:02:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMP Draft 19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

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From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
To: mntambom@kznwildlife.com
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Monday, 02 March 2020 10:55:00
Attachments: [Comment sheet Ladysmith.docx](#)
[Ilahle Ladysmith Prospecting BAR and EMPr Draft 02032020.pdf](#)

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Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt)
Bcc: zwelakhei.mchunu@gmail.com; info@kwanalu.co.za; elnordavies@gmail.com; sb4786zn@gmail.com; bdrew@mweb.co.za; drbryandrew@gmail.com; janealicedrew@gmail.com; strachanboerdery@gmail.com; NTOMBI.MASEKO@ARIVIA.CO.ZA; wtsrob004@uct.ac.za; allan@mimtams.co.za; info@ontokozweni.co.za; logan@occurse.co.za; chris@middledale.co.za; justin@middledale.co.za; dominic.weiners@kznwildlife.com; bernadetp@amafapmb.co.za
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Friday, 21 February 2020 13:16:00
Attachments: [Ilahle Ladysmith Prospecting BAR and EMPr Draft 19022020.pdf](#)
[Comment sheet Ladysmith.docx](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) proposes to conduct prospecting activities for coal, limestone and Pseudocoal on various properties approximately 6km west of Ladysmith, KwaZulu Natal. Prospecting and its associated activities require an Environmental Authorisation (EA) in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA). A Basic Environmental Impact Assessment (BA) process must be undertaken in support of the EA application.

EXM Advisory Services has been appointed as an independent Environmental Assessment Practitioner, responsible for undertaking the BA and Public Participation Process on behalf of the applicant Ilahle 4 KZN (Pty) Ltd.

Attached please find the draft Basic Assessment Report (BAR) which contain all relevant information regarding the proposed project and the EA application process. The BAR is also available for review at the following locations:

Hard copy: Hard copy at the Pongola Library (Murchison Street, Ladysmith)

Electronic copy: trevor@exm.co.za (on request)

If you wish to register as an Interested and/or Affected Party or raise any comments, please completed the attached comment sheet and return within **30 days** from this notification.

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor

Zama Khumalo

From: Jane Drew <janealicedrew@gmail.com>
Sent: 10 December 2019 19:06
To: Zama Khumalo
Subject: Affected Party - Ilahle Ladysmith Prospecting

Dear Mr Khumalo,

Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an "interested and affected party".

We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.

Our details are as follows:-

Bryan Drew
P.O. Box 2971
Ladysmith
3370
Email: drbryandrew@gmail.com
Cell: 0829236321

Zama Khumalo

From: Jane Drew <janealicedrew@gmail.com>
Sent: 10 December 2019 19:06
To: Zama Khumalo
Subject: Affected Party - Ilahle Ladysmith Prospecting

Dear Mr Khumalo,

Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an "interested and affected party".

We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.

Our details are as follows:-

Bryan Drew
P.O. Box 2971
Ladysmith
3370
Email: drbryandrew@gmail.com
Cell: 0829236321

Appendix 2.6: Comments and response

From: [Allan Watson](#)
To: [Trevor Hallatt](#)
Cc: [brian](#)
Subject: RE: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 25 February 2020 09:06:23
Attachments: [Comment sheet Ladysmith.docx](#)

Hi Trevor,

Please find comment sheet attached

Regards

Allan Watson
Mimtams Farming
083 627 8484

From: Trevor Hallatt [mailto:trevor@exm.co.za]
Sent: 21 February 2020 01:18 PM
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) proposes to conduct prospecting activities for coal, limestone and Pseudocoal on various properties approximately 6km west of Ladysmith, KwaZulu Natal. Prospecting and its associated activities require an Environmental Authorisation (EA) in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA). A Basic Environmental Impact Assessment (BA) process must be undertaken in support of the EA application.

EXM Advisory Services has been appointed as an independent Environmental Assessment Practitioner, responsible for undertaking the BA and Public Participation Process on behalf of the applicant Ilahle 4 KZN (Pty) Ltd.

Attached please find the draft Basic Assessment Report (BAR) which contain all relevant information regarding the proposed project and the EA application process. The BAR is also available for review at the following locations:

Hard copy: Hard copy at the Pongola Library (Murchison Street, Ladysmith)

Electronic copy: trevor@exm.co.za (on request)

If you wish to register as an Interested and/or Affected Party or raise any comments, please completed the attached comment sheet and return within **30 days** from this notification.

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

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M: +27 (0) 71 689 2229

W: WWW.EXM.CO.ZA

PUBLIC INPUT SHEET FOR ILAHLE 4 KZN (LADYSMITH) PROSPECTING RIGHT APPLICATION	
Name:	Allan Watson
Address:	Mimtams Farm, PO Box 74, Ladysmith,3370
Telephone/cell phone:	083 627 8484
Fax:	
E-mail:	allan@mimtams.co.za
Date:	25/02/2020
Signature:	

If you know of others who should be informed of this application, please provide us with their contact details:

Name:	Brian Watson
Address:	Mimtams Farm, PO Box 74, Ladysmith, 3370
Telephone/cell phone:	072 647 9876
Fax:	
E-mail:	brian@mimtams.co.za

ISSUES, CONCERNS AND QUESTIONS
We own land adjacent to the affected area and also farm on land that we lease in the affected area
Concerns:
<ol style="list-style-type: none"> 1) Increased stocktheft due to the influx of strangers into the area 2) Farm security due to the above 3) Fires from drilling operations and general staff negligence 4) General security with gates being left open and generally a lack of control 5) Inconvenience of having to accommodate drilling crews 6) Degradation of grazing due to increased vehicular traffic

EXM Advisory Services

Fax: 086 616 0443

PO Box 1822, Rivonia, 2128

email: trevor@exm.co.za

From: [Trevor Hallatt](#)
To: "[Allan Watson](#)"
Cc: [brian](#)
Subject: RE: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 25 February 2020 09:11:00

Good day,

Thank you for the communication regarding the application. I will shortly respond to your comments.

Kind regards

Trevor



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M: +27 (0) 71 689 2229

W: WWW.EXM.CO.ZA

From: Allan Watson <allan@mimtams.co.za>
Sent: Tuesday, 25 February 2020 09:06
To: Trevor Hallatt <trevor@exm.co.za>
Cc: brian <brian@mimtams.co.za>
Subject: RE: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith

Hi Trevor,

Please find comment sheet attached

Regards

Allan Watson
Mimtams Farming
083 627 8484

From: Trevor Hallatt [<mailto:trevor@exm.co.za>]
Sent: 21 February 2020 01:18 PM
Subject: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

From: [Trevor Hallatt](#)
To: [Allan Watson](#)
Subject: RE: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 17 March 2020 16:39:00
Attachments: [Tlahle Ladysmith Prospecting BAR and EMPr Draft 02032020.pdf](#)

Good day Allan,

Your comments received regarding the proposed prospecting activities near Ladysmith have reference:

Comments received:

- Increased stock theft due to the influx of strangers into the area
- Farm security due to the above
- Fires from drilling operations and general staff negligence
- General security with gates being left open and generally a lack of control
- Inconvenience of having to accommodate drilling crews
- Degradation of grazing due to increased vehicular traffic

Reply to the comment received:

- The Environmental Management Programme (EMPr) developed for the proposed prospecting activities that were provided to the Interested and or Affected Parties and attached to this mail contains mitigation measures to avoid or minimize potential environmental impacts.
- Reputable drilling contractors with ample experience will be used and workers will be under strict supervision to prevent any negligence related to activities such as the closing of gates.
- No fires will be allowed at the site as stated in the EMPr.
- No workers will be allowed to stay overnight at the drilling locations.
- Existing roads will be used as far as possible to avoid impacts on vegetation cover.
- Land owners will be approach to reach an agreement with regards to the location of drilling sites that will affect current land use.
- Measures have been included in the EMPr to apply good house keeping practices and the sites will be cleaned/remediated as part of the rehabilitation of the site.
- The sites will be rehabilitated and revegetated to allow for the continuation of activities such as grazing.

Your comments will be incorporated in the BAR and EMPr that will be submitted to the competent authority.

Please do not hesitate to contact me if you have any further comments regarding the information provided.

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
To: bdrew@mweb.co.za; drbryandrew@gmail.com; janealicedrew@gmail.com
Subject: Public Participation Process Ladysmith Prospecting Application - Response to Comments
Date: Friday, 21 February 2020 18:10:00

Good day,

Your comments received on the 10th of December 2019 regarding the prospecting right application near Ladysmith has reference.

Comments:

- Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an "interested and affected party."
- We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.

Response

- The positioning of the boreholes as per the final layout plan of the Basic Assessment Report (BAR) takes into account all water courses on site and the drilling sites will not be situated within a 100m buffer from dams, wetlands or streams to avoid impacts. The Environmental Management Programme (EMPr) provides measures that must be implemented to prevent or minimise impacts on water resources. The applicant is committed to rehabilitate all prospecting sites according to the closure and rehabilitation plan.
- The mitigation measures contained in the EMPr makes provision to prevent/minimize impacts disturbance caused by the prospecting activities.
- The EMPr makes provision for the applicant to approach all relevant stakeholder to reach an agreement should prospecting be conducted on areas where cultivation and other farming activities are conducted.
- Your comments will be incorporated in the BAR and EMPr that will be submitted to the authorities.

Please do not hesitate to contact me if you have further comments/concerns.

Contact person: Trevor Hallatt
Cell phone nr: 071 689 2229
Fax: 086 616 0443
Email: trevor@exm.co.za

Kind regards
Trevor

From: [Jennifer de Villiers](#)
To: [Trevor Hallatt](#)
Subject: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL
Date: Wednesday, 26 February 2020 16:22:36

Hi Trevor,

Could you please provide an electronic copy of the BAR? I would also like to register as an I&AP.

Thank you,
Jennifer

From: [Trevor Hallatt](#)
To: [Jennifer de Villiers](#)
Subject: RE: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL
Date: Wednesday, 26 February 2020 17:59:00
Attachments: [Tshle Ladysmith Prospecting BAR and EMPr Draft 19022020.pdf](#)

Good day Jennifer,

Please find attached a copy of the BAR as requested. I will add you to the list of I&APs.

Kind regards
Trevor



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This email is confidential, may also be legally privileged and is intended for the exclusive use of the recipient to whom it is addressed. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

From: Jennifer de Villiers <jennifer.devilliers1@gmail.com>
Sent: Wednesday, 26 February 2020 16:22
To: Trevor Hallatt <trevor@exm.co.za>
Subject: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Hi Trevor,

Could you please provide an electronic copy of the BAR? I would also like to register as an I&AP.

Thank you,
Jennifer

From: [Trevor Hallatt](#)
To: [Jennifer de Villiers](#)
Subject: RE: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL
Date: Wednesday, 26 February 2020 18:16:00

Thanks Jennifer, any comments are welcome

From: Jennifer de Villiers <jennifer.devilliers1@gmail.com>
Sent: Wednesday, 26 February 2020 18:15
To: Trevor Hallatt <trevor@exm.co.za>
Subject: Re: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Hi Trevor,

Thank you very much! I will be in touch with any queries or comments.

Kind regards,
Jennifer

On Wed, Feb 26, 2020 at 6:00 PM Trevor Hallatt <trevor@exm.co.za> wrote:

Good day Jennifer,

Please find attached a copy of the BAR as requested. I will add you to the list of I&APs.

Kind regards
Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

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From: Jennifer de Villiers <jennifer.devilliers1@gmail.com>
Sent: Wednesday, 26 February 2020 16:22
To: Trevor Hallatt <trevor@exm.co.za>
Subject: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Hi Trevor,

Could you please provide an electronic copy of the BAR? I would also like to register as an I&AP.

Thank you,

From: [Justin Green](#)
To: [Trevor Hallatt](#)
Subject: Re: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Sunday, 22 March 2020 23:56:31
Attachments: [Comments on Draft BAR_March 2020.docx](#)

Dear Trevor

Pls find comments and objections attached. I look forward to engaging further.

Kind regards,

Justin Green
Green H Ranches CC

On Fri, Feb 21, 2020 at 1:46 PM Trevor Hallatt <trevor@exm.co.za> wrote:

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) proposes to conduct prospecting activities for coal, limestone and Pseudocoal on various properties approximately 6km west of Ladysmith, KwaZulu Natal. Prospecting and its associated activities require an Environmental Authorisation (EA) in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA). A Basic Environmental Impact Assessment (BA) process must be undertaken in support of the EA application.

EXM Advisory Services has been appointed as an independent Environmental Assessment Practitioner, responsible for undertaking the BA and Public Participation Process on behalf of the applicant Ilahle 4 KZN (Pty) Ltd.

Attached please find the draft Basic Assessment Report (BAR) which contain all relevant information regarding the proposed project and the EA application process. The BAR is also available for review at the following locations:

Hard copy: Hard copy at the Ladysmith Library (Murchison Street, Ladysmith)

Electronic copy: trevor@exm.co.za (on request)

If you wish to register as an Interested and/or Affected Party or raise any comments, please completed the attached comment sheet and return within **30 days** from this notification.

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

T: +27 (0) 10 007 3617

M: +27 (0) 71 689 2229

W: WWW.EXM.CO.ZA

Trevor Hallat
EXM Advisory Services
trevor@exm.co.za
071 689 2229

22 March 2020

Dear Mr Hallat,

RE: Comments on the Ilahle 4 KZN (Pty) Ltd Basic Assessment Report and Environmental Management Programme (EIA Ref: KZN 30/5/1/1/2/10919 PR)

As landowners of a portion of the proposed site, we would like to express the following concerns regarding the application lodged by Ilahle 4 KZN (Pty) Ltd for a prospecting right in Ladysmith, KwaZulu Natal and the related Draft Basic Assessment Report (BAR) and Environmental Management Programme (EMPr):

1. Public Participation Process

Regulation 41(2)(b) of GNR 326 requires that landowners as well as occupiers of the site and occupiers of land adjacent to the site must be notified of the application. Although the landowners and adjacent landowners of farms commonly referred to as Middledale & Smalhoek (Green H Ranches CC) were notified of the application, there is no evidence to suggest that the occupiers of the farms Middledale & Smalhoek, who are employed by Green H Ranches CC (the landowner), and/or its subsidiaries, were notified of this application. There are currently 15 families and over 100 people who permanently live on these farms, none of whom received notification of this public participation process or were afforded the chance to participate.

Regulation 41(2)(e) requires that notice must be given to all potential I&APs "using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage." There are several occupants dwelling on the Farms Middledale & Smalhoek, who have not completed formal schooling and cannot read and write in English and are therefore unable to fully access the BAR and are ultimately excluded from participating or commenting.

Regulation 41(2) further requires that the public participation process must take into account any relevant guidelines as contemplated in Section 24J of NEMA. GN 807 of 10 October 2012 "Publication of Public Participation Guideline" was published in terms of Section 24J of NEMA and requires, under Section 4.1(a), that a site notice be displayed for the duration of the commenting period. Pg. 18 of the Draft BAR, under Section 2, states that "the site notices were available for a period of three (3) weeks," which is a shorter duration than the legally required public participation period of 30 days. This is of particular concern as the site notices were the only form of notification provided in isiZulu, which is the predominant language of the occupiers of the site and land adjacent to the site.

Regulation 3(1) of GNR 326, in reference to timeframes as part of an EIA process, states that "if the last day of the period falls on a Saturday, Sunday or public holiday, that period

must be extended to the end of the next day which is not a Saturday, Sunday or public holiday." The BAR states that public participation runs from 21 February 2020 until Sunday, 22 March 2020. Furthermore, Regulation 3(5) states that "where a prescribed timeframe is affected by one or more public holidays, the timeframe must be extended by the number of public holiday days falling within that timeframe." Human Rights Day, a public holiday in South Africa, falls on 21 March 2020, which is within the 30-day public participation period. Public participation must therefore be extended to account for the public holiday and to ensure that it does not conclude on a Saturday or Sunday. All I&APs should be timeously notified of this extension.

Additionally, Regulation 3(2) and (3) requires that public participation must not be conducted over the period of 15 December to 5 January. It is noted that the site notices "were placed at various locations on 5 December 2019" (pg. 18) and "were available for a period of three (3) weeks" (pg. 18). The period that the site notice were available therefore coincided with the exclusion period of 15 December to 5 January. The BAR does not state that these notices were available for any additional periods.

Given the number of procedural flaws in the current and previous public participation process, we therefore request that an additional public participation process is undertaken that is fully compliant with the EIA Regulations (2014, as amended) whereby:

- All I&APs are provided a full 30 days to comment and where the commenting period does not conclude on a Saturday or Sunday;
- All occupants of the affected sites are notified in a manner that is appropriate, taking into account language abilities and literacy levels; and
- Site notices are displayed for the duration of the commenting period to ensure that all potential I&APs are provided an opportunity to register and participate.

2. Landowner Consent/ Agreements and Compensation

The BAR states that "relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling" (pg. 38). Furthermore, the BAR states that "several drill sites are still located within cropland but agreement or compensation will need to be sought should the specific site be developed" (pg. 43).

To date, no written agreements are in place with any of the affected landowners and no compensation has been agreed upon where viable agricultural land will be affected. We are therefore requesting clarity on when negotiations will take place and how compensation will be calculated.

It is also noted that "the nature of prospecting involves invasive drilling of sites not exceeding 15m x 20m. The drill sites are not fixed and can be relocated by 1-50 meters" (pg. 57). We would like to confirm that drill sites may not be relocated without prior consent from landowners.

3. Rehabilitation Measures and Mine Closure Plan

The EMPr (pg 122 of the PDF) and the Mine Closure Plan (pg. 132 of the PDF) provide the proposed rehabilitation measures. These measures are insufficient based on the following criteria:

- The veld grass Themeda Triandra is prevalent in the prospecting area. This grass is highly valuable for livestock farming, and impossible to replace and/or restore to original state within a 2 week period, if at all.
- The study fails to take into account the impact of wind on the spread of dust. Dust is particularly harmful to humans (allergies), grasslands (making grazing impalatable) and soil profiles (impact of potentially harmful spread of foreign material). There is no mention of the rehabilitation or rectification of harm caused to humans, the palatability of grasses and long-term soil damage.
- The contamination of water courses, dams and soil will result in long-term and possibly irrevocable damage to farming operations. In the event of contamination, what are the procedures and penalties to be enforced?

The closure costing provisions (pg. 200 of the PDF) provide a breakdown of the rehabilitation costs and how these were calculated. It is our experience that often rehabilitation is not carried out in a satisfactory manner. With this in mind, we require that there are financial penalties and financial compensation for landowners should rehabilitation not happen within a specified timeframe and to the state in which the area was originally found.

Furthermore, the details of compensation in the event of loss of income and/or permanent damage to property and/or business activities should be stipulated. This should include the presentation of sufficient 3rd party liability insurance by the prospecting company to landowners.

4. Access

The BAR states that "existing farm tracks and roads will be followed for entry and exit to all drill sites. Site locations will be determined to ensure short and easy access. All access on farms will be conducted in terms of a written agreement with the landowner. In instances where no access road is available to the site location, a single track will be chosen on the basis of least environmental impact on natural habitat considered the last option. Only these tracks will be followed and will not be deviated from" (pg. 13). Permission to deviate from existing farm tracks should be obtained from the landowner in writing.

We support the statement that a written agreement must be entered into before farms can be accessed.

The EMPr states that rehabilitation of access roads will be undertaken as part of decommissioning. Please could you confirm the specific rehabilitation measures to be implemented. We also request that roads are rehabilitated on a continual basis as required, and not just as part of decommissioning, as these roads are vital to farming operations and must be maintained throughout the 48-month drilling operations.

5. Safety and Security

It is noted that drilling will be undertaken for a period of 48 months where contractors and drilling personnel will be allowed access to the site. This poses a significant security concern for the occupants of the land (specifically the vulnerable members of the community, such as women and children).

Given the high incidences of crime in the area, we do not believe that the safety and security mitigation measures proposed in the EMPr are adequate for ensuring the safety of the occupants of the site. In addition to the fencing proposed, we would like to request that security guards from a reputable service provider are posted at the drill sites or at key access points to ensure that only authorised personnel are allowed on site and to ensure that drilling contractors do not move outside designated areas.

6. Conservation of Biodiversity and Water Courses

A number of drill sites fall within water courses, or water course basins. We unequivocally object to these sites on the basis that harmful materials are used in the drilling process, and these harmful substances entering water courses pose a significant risk to human and animal life. Furthermore, contamination of watercourses poses significant long-term risk and damage to intensive agricultural practices like ours (dairy farming), potentially destroying the business in the process. These sites should be removed altogether, and no site should be situated within 500 meters of a watercourse or dam, or within a watercourse basin. The proposed 100 meters is wholly insufficient.

7. Disruption to Farming Operations

The proposed drilling on our farms will significantly disrupt our operations by:

- making areas of our farm unusable. This is especially problematic in areas where intensive agriculture is practiced.
- the spread of dust onto grasses makes them unpalatable to livestock. With the further impact of wind, this makes large areas of our farm unusable over the period and beyond.
- cutting of fences for access to drill sites.
- overuse of farm roads
- disruption to normal farm activity

As a result, those drill sites that fall within intensive farming areas (i.e. pastures / crop lands) should be moved. And, as stated previously, compensation should be paid where the impact of drilling leads to loss of productivity and income.

8. Other Points of Objection

- certain drilling sites are situated too close to family homes. No drilling should take place within 500 meters of a house (100m insufficient)
- working hours should be limited to normal business hours of 9am - 5pm. The document currently states (daylight hours).
- there is no mention of recourse / compensation with regards to theft, damage to property, sickness/disease of humans and livestock, long-term negative impact on farming activities. This should be detailed and covered by an active insurance policy.

In conclusion, we as Green H Ranches wholeheartedly object to the prospecting for coal on our farms. Agriculture, especially intensive agriculture such as dairy farming (which we do), is highly environmentally sensitive. The short-term disruption and long-term risks posed by drilling activities, including the use of highly toxic chemicals, poses significant risk to our business, the hundreds of people who live on our farms, and the ecological environment.

Kind regards,

Justin Green (for and on behalf of Green H Ranches CC)

From: [Trevor Hallatt](mailto:Trevor.Hallatt)
To: "chris@middledale.co.za"; "justin@middledale.co.za"
Subject: RE: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith
Date: Tuesday, 02 June 2020 09:44:00
Attachments: [Comments on Draft B&R_March 2020.docx](#)

Good day Justin,

As per the attached comments and the email communication below, can you please provide contact information (email and telephone number) for a representative/s of the families residing on the properties mentioned.

Kind regards
Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

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W: WWW.EXM.CO.ZA

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From: Trevor Hallatt
Sent: Thursday, 30 April 2020 14:07
To: justin@middledale.co.za
Subject: FW: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith

Good day Justin,

As per the attached comments regarding the Ilahle prospecting right application near Ladysmith, can you please provide contact information (email and telephone number) for a representative of the families residing on the properties mentioned. As you are aware, the national lockdown restricts personal contact and we will have to contact the representative remotely. Your comments are noted and will be addressed in the final Basic Assessment Report once the process is complete. This report will once again be submitted to you for reference.

Kind regards
Trevor

T: +27 (0) 10 007 3617

M: +27 (0) 71 689 2229

W: WWW.EXM.CO.ZA

This email is confidential, may also be legally privileged and is intended for the exclusive use of the recipient to whom it is addressed. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.

From: Justin Green <justin@middledale.co.za>

Sent: Sunday, 22 March 2020 23:56

To: Trevor Hallatt <trevor@exm.co.za>

Subject: Re: Public Participation Process - Basic Environmental Impact Assessment near Ladysmith

Dear Trevor

Pls find comments and objections attached. I look forward to engaging further.

Kind regards,

Justin Green

Green H Ranches CC

On Fri, Feb 21, 2020 at 1:46 PM Trevor Hallatt <trevor@exm.co.za> wrote:

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

KZN 30/5/1/1/2/10919 PR

ILAHLE 4 KZN (PTY) LTD

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION NEAR LADYSMITH, KWAZULU NATAL

Ilahle 4 KZN (Pty) Ltd (Ilahle 4 KZN) proposes to conduct prospecting activities for coal, limestone and Pseudocoal on various properties approximately 6km west of Ladysmith, KwaZulu Natal. Prospecting and its associated activities require an Environmental Authorisation (EA) in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA). A Basic Environmental Impact Assessment (BA) process must be undertaken in support of the EA application.

EXM Advisory Services has been appointed as an independent Environmental Assessment Practitioner, responsible for undertaking the BA and Public Participation Process on behalf of the applicant Ilahle 4 KZN (Pty) Ltd.

Attached please find the draft Basic Assessment Report (BAR) which contain all relevant information regarding the proposed project and the EA application process. The BAR is also available for review at the following locations:

Hard copy: Hard copy at the Ladysmith Library (Murchison Street, Ladysmith)

Electronic copy: trevor@exm.co.za (on request)

If you wish to register as an Interested and/or Affected Party or raise any comments, please completed the attached comment sheet and return within **30 days** from this notification.

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 616 0443

Email: trevor@exm.co.za

Kind regards

Trevor



TREVOR HALLATT
ENVIRONMENTAL SCIENTIST
MA ENVIRONMENTAL MANAGEMENT

T: +27 (0) 10 007 3617

M: +27 (0) 71 689 2229

W: WWW.EXM.CO.ZA

From: [Jane Drew](#)
To: [Trevor Hallatt](#)
Subject: Ilahle Ladysmith Prospecting
Date: Monday, 14 September 2020 16:50:13

Good day Trevor,

The below message was sent to Mr Khumalo on 10th December 2019. According to what I can see in your report, our concerns as recorded below were attributed to Justin and Allan Green and not to my husband, Bryan Drew. We are horrified to see on your drill site map that the majority of the drilling points are on our home farm; literally all around our house! In order to access the one proposed drilling area, all vehicles would have to drive past our house, through our yard and over the Dewdrop River. This is completely unacceptable to us! It will disrupt our lives in many ways (e.g. noise and dust pollution from vehicles driving around our house, jeopardizing our privacy, etc). We always experience security issues when "outsiders" have access to these parts of our farm. We are not prepared to take this risk. Furthermore, we are totally against the use of "hazardous" materials and waste so close to our crop and livestock operation and so close to the Dewdrop River and our dams. Another major concern is that drill sites are proposed where we have pivot irrigation. This is also totally unacceptable to us! We rely heavily from a financial point of view on the small areas that we are able to cultivate. We definitely cannot afford to have this aspect of our farming operation jeopardized! Another large drilling area is across the road (i.e. the D344) from our house. This area of land is prime grazing land, which we cannot afford to lose.

It angers and saddens me deeply that someone, for their financial gain, would even entertain the thought of conducting mining operations that would so directly affect the home and livelihood of others.

Regards,
Jane Drew

Dear Mr Khumalo,

Regarding the EIA process and application for a coal prospecting right near Ladysmith, KZN, we request to be registered as an "interested and affected party". We vehemently object to any prospecting over our properties, as the proposed activities will destroy pristine farmland and multiple water courses, thereby destroying our livelihood.

Our details are as follows:-
Bryan Drew
P.O. Box 2971
Ladysmith
3370
Email: drbryandrew@gmail.com
Cell: 0829236321

Comment and response included in the final BAR

Appendix 2.7 Consultation with ward councillor

ILAHLE 4 KZN (PTY) LTD

APPLICATION FOR A PROSPECTING RIGHT FOR COAL AND PSEUDOCOAL NEAR LADYSMITH, KWAZULU NATAL PROVINCE

RECORD OF TELEPHONIC DISCUSSIONS BETWEEN ZAMA KHUMALO AND PAUL SIGUBUDU (WARD COUNCILLOR WARD 11 OKHAHLAMBA LOCAL MUNICIPALITY

DATE: 8 SEPTEMBER 2020

TIME: 10: 50

Zama Khumalo phoned Mr Sigubudu to obtain contact details of landowners within his ward (11) of Okhahlamba Local Municipality. Zama explained that she is conducting a Public Participation Process in support of the Environmental Impact Assessment for the Prospecting Right Application. She stated that Ilahle 4 KZN (Pty) Ltd was proposing to prospect for coal on Farm Marius Heuvel which falls under his jurisdiction. Zama indicated that the property is owned by Kwantabamnyama Community Trust and Boyabenyathi Family Trust. Zama indicated that she emailed the background information document to him previously for further details.

Paul indicated that his ward is big and he knows that there is a community called Kwantabamnyama which has properties owned by white farmers and a property that was given to the local community via the land restitution process. He indicated that he does not have contact numbers for the community but will however go and do some field work and provide feedback to Zama.

It was therefore concluded that Mr Sigubudu will go and speak to the community and forward contact details to Zama to proceed with the consultation process.

Post Phone Note:

- The number used to consult with the Chief was 060 709 9762.
- Follow up consultation was conducted on the 14th of September 2020 to obtain feedback from the community notification process. Mr Sigubudu indicated

	that he got a contact and will be communicating with the community on 15 September 2020.
--	--

Appendix 2.8 Notification of extended PPP period

27747681067	SUBMITD	<p>Please note that the public participation period for the Ilahle Ladysmith Prospecting Right application and Basic Impact Assessment (KZN 30/5/1/1/2 10919 PR) has been extended. Please contact Trevor Hallatt at 0716892229 or trevor@exm.co.za to obtain the Basic Assessment Report for review. All comments must be submitted before 14 September 2020.</p>
27788020598	SUBMITD	
27827766296	SUBMITD	
27828222496	SUBMITD	
27828735983	SUBMITD	
27842555330	SUBMITD	
27712980210	DELIVRD	
27726685508	DELIVRD	
27729631010	DELIVRD	
27736528904	DELIVRD	
27788020600	DELIVRD	
27822922314	DELIVRD	
27824192881	DELIVRD	
27824507525	DELIVRD	
27824516242	DELIVRD	
27828027005	DELIVRD	
27828080208	DELIVRD	
27828865451	DELIVRD	
27829009593	DELIVRD	
27829236321	DELIVRD	
27829537740	DELIVRD	
27832846274	DELIVRD	
27832926219	DELIVRD	
27835163084	DELIVRD	
27836278484	DELIVRD	
27836456444	DELIVRD	
27837863113	DELIVRD	

From: [Trevor Hallatt](#)
Bcc: "[chris@middledale.co.za](#)"; "[justin@middledale.co.za](#)"; "[info@kwanalu.co.za](#)"; "[carol@harmonyfarm.co.za](#)"; "[NkabindeD@nra.co.za](#)"; "[mlambob@nra.co.za](#)"; "[elnordavies@gmail.com](#)"; "[bdrew@mweb.co.za](#)"; "[drbryandrew@gmail.com](#)"; "[janealicedrew@gmail.com](#)" "[strachanboerdery@gmail.com](#)"
Subject: Ilahle Ladysmith Basic Impact Assessment - Extended Public Participation Period
Date: Friday, 14 August 2020 16:18:00
Attachments: [image001.png](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

DMR reference: KZN 30/5/1/1/2/10919 PR

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHC AND PROSPECTING RIGHT APPLICATION LADYSMITH, KWAZULU NATAL

Please note that the public participation period for the above project has been extended. Ar days is allocated for the review of the supporting documents and to provide comments.

The Basic Assessment Report (BAR) is available for review at the following locations:

- **Dropbox electronic link:** <https://www.dropbox.com/sh/r15mqu2hz50xhvy/AACqG0lf42YxnhUdl=0>
- **Onedrive electronic link:** https://exmadvisoryservices-my.sharepoint.com/:f:/g/personal/trevor_exm_co_za/EvMrauLxY6ZBrf1PT10APPgBXJRvs7aEfe=VBZd6f

All comments received thus far and responses thereto have been incorporated in the draft B/

All new comments must be submitted to the contact details by the **14th of September 2020**

Please feel free to contact me in the interim if you have any comments or queries.

Kind regards

Trevor Hallatt

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 527 4619

From: [Trevor Hallatt](mailto:Trevor.Hallatt)
Bcc: "trachanboerdery@gmail.com"; "trachanboerdery@gmail.com"; "wtsrob004@uct.ac.za"; "peter@brakfonteinfarm.co.za"; "qgreen@futurenet.co.za"; "chris@middledale.co.za"; "justin@middledale.co.za"; "elnordavies@gmail.com"; "allan@mimtams.co.za"; "brian@mimtams.co.za"; "sonjalaw4@gmail.com"; "info@ntokozweni.co.za"; "zwelakhei.mchunu@gmail.com"; "sb4786zn@gmail.com"; "logan@occusure.co.za"; "pmkhasibe@metropolitan.co.za"
Subject: Ilahle Ladysmith Basic Impact Assessment - Extended Public Participation Period
Date: Friday, 14 August 2020 16:19:00
Attachments: [image001.png](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

DMR reference: KZN 30/5/1/1/2/10919 PR

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION LADYSMITH, KWAZULU NATAL

Please note that the public participation period for the above project has been extended. An additional 30 days is allocated for the review of the supporting documents and to provide comments.

The Basic Assessment Report (BAR) is available for review at the following locations:

- **Dropbox electronic link:** <https://www.dropbox.com/sh/rl5mqu2hz50xhvy/AACqG0lf42YxnhUIOmvdrrwGza?dl=0>
- **Onedrive electronic link:** https://exmadvisoryservices-my.sharepoint.com/:f/g/personal/trevor_exm_co_za/EvMrauLxY6ZBf1PT10APPgBXRvS7aEfatsSr1oC7J8zw?e=VBZd6f

All comments received thus far and responses thereto have been incorporated in the draft BAR.

All new comments must be submitted to the contact details by the **14th of September 2020**

Please feel free to contact me in the interim if you have any comments or queries.

Kind regards

Trevor Hallatt

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 527 4619

Email: trevor@exm.co.za

Kind regards

Trevor

From: Trevor Hallatt
Bcc: "sandile.njapha@dmr.gov.za"; "sekubheka@alfredduma.gov.za"; "mm@alfredduma.gov.za"; "samke.msibi@okhahlamba.gov.za"; "paul.sigubudu11@gmail.com"; "Hlengiwe.Ndaba@okhahlamba.gov.za"; "sbongile.zikalala@okhahlamba.gov.za"; "mayor@uthukeladm.co.za"; "mm@uthukeladm.co.za"; "MthalaneA@dws.gov.za"; "bernadertp@amafapmd.co.za"; "bheki.mbill@drdlr.gov.za"; "bhekumuzi.matheniwa@kznedtea.gov.za"; "AmkelaC@daff.gov.za"; "ThembalakeS@daff.gov.za"; "rob.crankshaw@amamarketing.co.za"; "hodpa@kzndard.gov.za"; "hod.pa@kzndard.gov.za"; "jerry.mfusi@kzndard.gov.za"; "sizile.mthalane@drdlr.gov.za"; "mtambom@kznwildlife.com"; "BuhleM@daff.gov.za"; "gerald.willissmith@kzndae.gov.za"; "moonsamvz@dwaf.gov.za"; "weinersd@kznwildlife.com"; "Mbal.mhlonoo@kzndhs.gov.za"; "Vanessa.Maclou@kzndae.gov.za"; "douglas.zungu@drdlr.gov.za"; "lizane.rungasamy@drdlr.gov.za"; "jeffreyMAI@daff.gov.za"; "Rodney.Harrylal@transnet.net"; "Thabisile.sakvi@kznhealth.gov.za"; "thando.tubane@kzncogta.gov.za"
Subject: Ilahle Ladysmith Basic Impact Assessment - Extended Public Participation Period
Date: Friday, 14 August 2020 16:20:00
Attachments: [image001.png](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

DMR reference: KZN 30/5/1/1/2/10919 PR

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION LADYSMITH, KWAZULU NATAL

Please note that the public participation period for the above project has been extended. An additional 30 days is allocated for the review of the supporting documents and to provide comments.

The Basic Assessment Report (BAR) is available for review at the following locations:

- **Dropbox electronic link:** <https://www.dropbox.com/sh/r15mq2hz50xhvy/AACqG0lf42YxnhUIOmvdwrwGza?dl=0>
- **Onedrive electronic link:** https://exmadvisoryservices-my.sharepoint.com/:f/g/personal/trevor_exm_co_za/EvMrauLxY6ZBrf1PT10APPgBXJRvS7aEfqtsSr1oC7J8zw?e=VBZd6f

All comments received thus far and responses thereto have been incorporated in the draft BAR.

All new comments must be submitted to the contact details by the **14th of September 2020**

Please feel free to contact me in the interim if you have any comments or queries.

Kind regards

Trevor Hallatt

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 527 4619

Email: trevor@exm.co.za

Kind regards

Trevor

From: [Trevor Hallatt](mailto:Trevor.Hallatt@exm.co.za)
Bcc: nerissa.pillay@kznwildlife.com; Noluthando.Dlamini@kznwildlife.com
Subject: Ilahle Ladysmith Basic Impact Assessment - Extended Public Participation Period
Date: Friday, 14 August 2020 16:28:00
Attachments: [image001.png](#)

ATTENTION: INTERESTED AND AFFECTED PARTY / COMMENTING AUTHORITY

DMR reference: KZN 30/5/1/1/2/10919 PR

PROJECT: BASIC ENVIRONMENTAL IMPACT ASSESSMENT IN SUPPORT OF ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHT APPLICATION LADYSMITH, KWAZULU NATAL

Please note that the public participation period for the above project has been extended. An additional 30 days is allocated for the review of the supporting documents and to provide comments.

The Basic Assessment Report (BAR) is available for review at the following locations:

- **Dropbox electronic link:** <https://www.dropbox.com/sh/rl5mqu2hz50xhvy/AACqG0lf42YxnhUIOmvdwGza?dl=0>
- **Onedrive electronic link:** https://exmadvisoryservices-my.sharepoint.com/:f/g/personal/trevor_exm_co_za/EvMraulxY67Bf1PT10APPgBXJRvS7aEfqtsSr1oC7J8zw?e=VB7d6f

All comments received thus far and responses thereto have been incorporated in the draft BAR.

All new comments must be submitted to the contact details by the **14th of September 2020**

Please feel free to contact me in the interim if you have any comments or queries.

Kind regards

Trevor Hallatt

Contact person: Trevor Hallatt

Cell phone nr: 071 689 2229

Fax: 086 527 4619

Email: trevor@exm.co.za

Kind regards

Trevor

Appendix 3: Environmental Impact Assessment Tables

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Topography	Change in natural topography of the site.	Construction	2	3	2,5	2	2,25	0,8	1,8	<ul style="list-style-type: none"> Stockpile soils removed for rehabilitation. Rehabilitate sites to original landform. 	0,6	1,08
Geology	Creation of conduits between geological strata.	Operations	1	4	2,5	3	2,75	0,6	1,65	<ul style="list-style-type: none"> Boreholes to be sealed with concrete. 	0,4	0,66
Soils	Potential loss of topsoil.	Operations	2	3	2,5	2	2,25	0,6	1,35	<ul style="list-style-type: none"> Keep the footprint of disturbance as small as practicably possible. Vegetation to be left in place to protect soils where possible. Where vegetation clearance cannot be avoided, storm water management measures to be put in place if there is a risk of soil erosion. Erosion protection where cut and fill and levelling of the drill site occurred. 	0,6	0,81
	Potential loss of soil resource.	Construction & Operation	3	3	3	2	2,5	0,6	1,5	<ul style="list-style-type: none"> Utilise existing access roads as far as possible. Keep the footprint of disturbance as small as practicably possible. Access roads to follow slope contours where possible. 	0,6	0,9

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> Vegetation to be left in place at the sides of the road to protect the soils. 		
	Risk of soil contamination.	Construction , Operation and Closure	3	3	3	2	2,5	0,8	2	<ul style="list-style-type: none"> Impermeable liners or surfaces to be provided in areas where hydrocarbons are managed Diesel storage areas to be bunded and regularly checked. Drip trays to be used when any vehicle maintenance is undertaken. Spill kits to be available at drill sites. Contaminated soil to be remediated in situ. 	0,6	1,2
Surface water resources	Contamination of surface water.	Construction , Operation and Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals). Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. 	0,6	1,44
	Increase in sediment loads as a result of erosion and heavy rainfall.	Construction , Operation and Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> Implement measures for soil erosion control in accordance with risk assessment. 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. 		
	General and human waste.	Construction , Operation and Closure	2	2	2	3	2,5	0,6	1,5	<ul style="list-style-type: none"> Contractors may only use designated toilets and waste disposal facilities. Separate, marked receptacles are to be provided for the storage of hazardous and general wastes at the waste generation points. Littering is not to be permitted. Measures for waste avoidance, minimisation, reuse and recycling must be implemented. Spills will be cleaned up appropriately. The ECO must ensure that spills are cleaned as soon as practicable and evidence of clean up measures must be maintained. All items that have come into contact with any hazardous chemical substance 	0,4	0,6

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										(including fuels/oils/greases/laboratory chemicals, sludge) are to be disposed as hazardous waste. <ul style="list-style-type: none"> All waste are to be disposed of as general waste 		
	Disturbance of surface water resources.	Construction	4	4	4	3	3,5	0,8	2,8	<ul style="list-style-type: none"> Boreholes to be situated outside of the 1 in 100 year floodline or 100m from the edge of a watercourse whichever is greater. Keep the footprint of disturbance as small as practicably possible 	0,6	1,68
Hydrogeology (Groundwater)	Seepage of fuels, oils and lubricants.	Construction, Operation and Closure	2	4	3	3	3	0,6	1,8	<ul style="list-style-type: none"> Impermeable floor or surfaces to be provided in areas where hydrocarbons are stored managed. Diesel storage areas to be bunded and regularly checked. Drip trays to be placed under vehicles susceptible of dripping oil. Spill kits to be available at drill sites. Bunded areas are to be created for the storage of all hazardous chemical 	0,6	1,08

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>substances (fuel, oil, lubricants and chemicals).</p> <ul style="list-style-type: none"> Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls. 		
	Cross contamination of aquifers due to borehole construction.	Operation & Closure	2	4	3	3	3	0,4	1,2	<ul style="list-style-type: none"> Boreholes that will not be used again will be backfilled with cement and sealed. Mitigation will entail the use of biodegradable or eco friendly drilling liquid. Alternatively, a drilling sock can also be used to soak up any contamination remaining after drilling operations have been completed. Purging of the borehole upon completion or to seal the borehole to prevent further use. The borehole can also be sealed to prevent use of the water for potable purposes. 	0,4	0,48

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
Noise	Increase in ambient noise levels. Disturbance to people and animals.	Construction, Operation and Closure	3	4	3,5	3	3,25	0,8	2,6	<ul style="list-style-type: none"> Avoid travelling past residences. Speed limit of 40km/h will be enforced Liaise with landowner on areas sensitive to noise. Provide a buffer of 100m from households. Drilling to take place during daylight hours. Borehole site and access route selection to minimize impacts on noise receptors 	0,6	1,56
Air Quality	Release of gaseous emissions.	Construction, Operation and Closure	2	4	3	3	3	0,4	1,2	<ul style="list-style-type: none"> No unnecessary revving of vehicles should take place. No vehicle must stand idling when not in use. 	0,4	0,48
	Dust fallout and fine particulate matter emissions.	Construction, Operation and Closure	2	4	3	3	3	0,6	1,8	<ul style="list-style-type: none"> Restrict travelling speed of vehicles to reduce vehicle entrainment of dust. Visual inspections will be conducted by the appointed Environmental Control Officer (ECO) and additional mitigation such as spraying of water on exposed surface will 	0,6	1,08

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										be conducted if increased dust generation is noted.		
Land Use and Land Capability	Intrusion due to drilling and prospecting activities in an area where agricultural uses are prominent.	Construction & Operation	3	4	3,5	3	3,25	0,8	2,6	<ul style="list-style-type: none"> Drilling sites must be selected to minimize disturbance of current land use. Relevant agreements must be in place with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling. 	0,4	1,04
	Reduction in land capability.	Construction	3	4	3,5	3	3,25	0,6	1,95	<ul style="list-style-type: none"> Rehabilitation of drill sites and access roads. 	0,6	1,17
Fauna, Flora and Ecology	Removal/ damage of natural vegetation due to fires and	Construction	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> No-go areas to be identified. Environmental awareness training of all employees responsible for drilling. Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. No activities to be conducted within the buffer zones around wetlands No activities to be conducted within the 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>critical biodiversity area</p> <ul style="list-style-type: none"> • Site selection aimed at minimising disturbance to natural vegetation.No smoking at the drilling sites. • Code of conduct to include measures for the prevention of fires. • Emergency equipment and procedures for fire fighting to be in place. • Adhere to emergency procedures. • Limit disturbance in sensitive or densely vegetated areas and no vegetation clearance except for borehole access point in these sites. • The seed mix used for rehabilitation must take into account the dominant plant species of the area. 		
	Establishment of drilling sites and access routes.	Construction , Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> • Site selection aimed at minimising disturbance to sensitive animal 	0,6	1,44

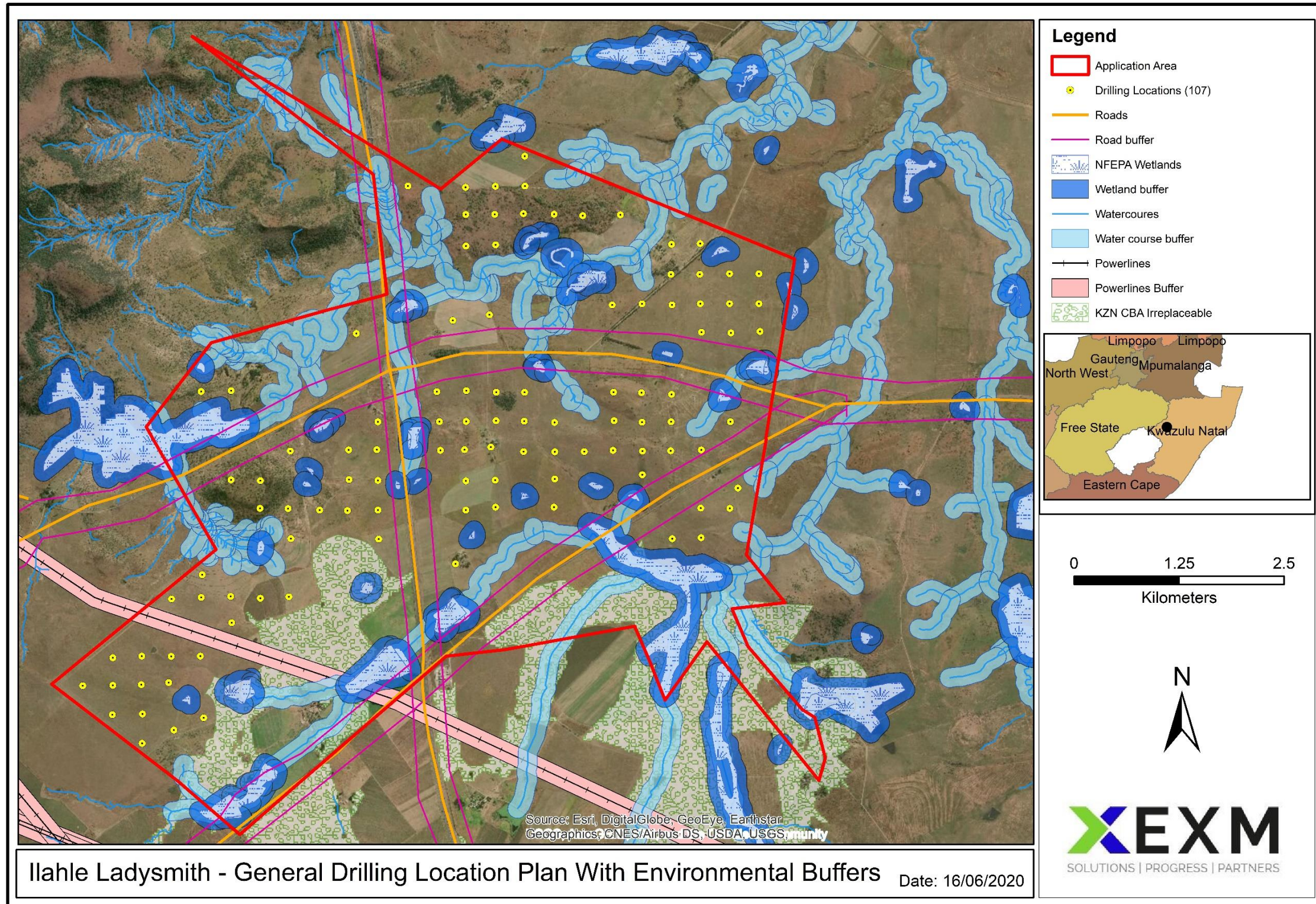
IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										habitats and breeding areas.		
	Disturbance/ poaching of animals	Construction	3	3	3	3	3	0,6	1,8	<ul style="list-style-type: none"> Drilling contractors are only allowed to move within the designated drilling area. Environmental awareness training should include poaching and disturbance of animals 	0,6	1,08
	Encroachment of Alien Invasive Plants	Construction , Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> Monitor areas for proliferation of Alien Invasive Plants during operations and after rehabilitation has been undertaken Eradication of Alien Invasive Plants as required Disturbance must be minimized and only be allowed in demarcated areas 	0,6	1,4
Sensitive and Protected Areas	Degradation and destruction of sensitive biodiversity	Construction , Operation & Closure	3	3	3	3	3	0,8	2,4	<ul style="list-style-type: none"> No-go areas to be identified. Environmental awareness training of all employees responsible for drilling. Site selection aimed at minimising disturbance to 	0,6	1,44

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>sensitive animal habitats and breeding areas.</p> <ul style="list-style-type: none"> No activities to be conducted within the 100m buffer zones around water courses. No activities to be conducted within the irreplaceable CBA Site selection aimed at minimising disturbance to natural vegetation. 		
Heritage Resources	Cultural heritage resources may be found within the study area	Construction and Operation	3	3	3	3	3	0,6	1,8	<ul style="list-style-type: none"> A 50 meter buffer zone must be established around any heritage site observed during site establishment. 	0,6	1,08
Economic Development	Contribution to the economy. Using local services such as accommodation .	Construction and Operation	1	4	3	2	2,5	0,2	0,5	<ul style="list-style-type: none"> Preference to be given to the use of local services providers for accommodation, purchasing of petrol etc. 	1	0,5
Visual and Sense of Place	Loss of sense of place due to prospecting activities	Construction , Operation & Closure	2	3	2,5	3	2,75	0,8	2,2	<ul style="list-style-type: none"> Implement measures to reduce the visual impacts of prospecting activities, i.e. rehabilitation of drill sites and access roads. 	0,6	1,32

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<ul style="list-style-type: none"> Buffers around residential units must be implemented. 		
Safety and Security	Movement of drilling contractors and influx of workers - increase in crime	Construction and Operation	3	4	3,5	4	3,75	0,6	2,25	<ul style="list-style-type: none"> Drilling contractors not allowed moving outside of designated areas. Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. 	0,6	1,35
	Overnight accommodation of drilling contractors - increase in crime	Construction , Operation & Closure	3	4	3,5	4	3,75	0,6	2,25	<ul style="list-style-type: none"> All personnel that have access to the property will be provided with access cards. All personnel that have access to the property need to be made visible. Drilling contractors to be housed off site. 	0,6	1,35
Stakeholder Acceptability	Prospecting on private property	Construction , Operation & Closure	4	4	4	3	3,5	0,8	2,8	<ul style="list-style-type: none"> Comply with the MPRDA & NEMA Implement and Comply with the EMP 	0,6	1,68
Social impact	Prospecting seen as a predecessor to mining and this raises a risk to various environmental impacts	Construction , Operation & Closure	4	4	4	4	3,75	0,8	3,2	<ul style="list-style-type: none"> An application for a mining right will require a separate EIA and public participation process and IAPs will be 	0,4	1,28

IMPACT CATEGORY	POTENTIAL IMPACT	PHASE	INTENSITY	DURATION	CONSEQUENCE	EXTENT	SEVERITY	PROBABILITY	SIGNIFICANCE WITHOUT MITIGATION	MITIGATION	MITIGATION CONFIDENCE	SIGNIFICANCE WITH MITIGATION
										<p>provided with the opportunity to raise their concerns.</p> <ul style="list-style-type: none"> This report should form part of the feasibility study towards a mining right application to ensure the current information and sensitivities identified in this process is considered 		

Appendix 4: Final Drill Site Layout



Appendix 5: Supplementary Environmental Management Plan

Ilahle 4 KZN (Pty) Ltd

Project **Ilahle 4 KZN (Pty) Ltd**
Project: **Ladysmith Prospecting**
Report **Environmental Management Plan**
Name:
Report Status: **Final**

Revision No: **00**
Report Date: **17 February 2020**
Prepared by: **EXM Advisory Services**
For Submission to: **KwaZulu Natal Department of Mineral Resources**
Reference No: **KZN 30/5/1/1/2/10919 PR**

PROJECT INFORMATION SHEET

COMPETENT AUTHORITY:

Kwa-Zulu Natal Department of Mineral Resources

Prospecting Right Application Ref: KZN 30/5/1/1/2/10919 PR

REPORT DETAILS:

Report Name: Environmental Management Plan

Report Status: Final

Revision No: 00

Date: 11 February 2020

PROJECT APPLICANT:

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1. Introduction

Ilahle 4 KZN (Pty) Ltd has applied for a prospecting right in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) (MPRDA). This application includes the prospecting for Coal in the Alfred Duma Local Municipality district in Kwa-Zulu Natal on the properties indicated Table 1 below:

Table 2 Farm portions within the prospecting right application

Farm Name:	Remaining Extent of the farm Marias Heuvel 2947 GS, Portion 4 and 7 of the farm Smalhoek 1282 GS, the Remaining Extent of the farm Smalhoek 1282 GS, the Remaining Extent of the farm Recompese 4790 GS, Portion1 of the farm Arcadia 2179 GS, Portion 1 of the farm Roodepoort 1119 GS, the farm Weston 2365 GS and the farm Marias Heuvel 13247 GS .
Application area (ha)	6 366 ha
Magisterial district:	Uthukela Magisterial District
Distance and direction from nearest town	The area is about 5.2 km west of Ladysmith
21-digit Surveyor General Code for each farm portion	N0GS00000000111900005 N0GS00000000111900007 N0GS000000001324700002 N0GS00000000124500008 N0GS00000000217900003 N0GS00000000111900004 N0GS00000000294700004 N0GS00000000294700000 N0GS00000000124500003 N0GS00000000111900001 N0GS00000000217900000 N0GS00000000217900001 N0GS00000000111900002 N0GS00000000236500000 N0GS00000000128200004 N0GS000000001324700000 N0GS000000001324700001 N0GS000000001324700003 N0GS00000000128200007 N0GS00000000111900003 N0GS00000000479000000 N0GS00000000111900006 N0GS000000000833800000 N0GS00000000294700000

This application was acknowledged by the KZN Department of Mineral Resources (DMR) with reference number: KZN 30/5/1/1/2/10919 PR

The Prospecting Right Application is subject to the following Acts:

- the National Environmental Management Act, 1998 (Act No.107 of 1998) (“NEMA”); and,
- the Mineral and Petroleum Resources Development Act, 2002 (act no.28 of 2002) (“MPRDA”).

In terms of the MPRDA an application for a Prospecting Right is subject to an application for environmental authorisation in terms of NEMA.

The following listed activities are applicable to the proposed project, and thus the application is subject to a Basic Assessment (“BA”) and Environmental Management Plan report.

- NEMA GN 983, Listing Notice 1, Activity Number 20: Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the MPRDA, including associated infrastructure, structures and earthworks, directly related to the prospecting of a mineral resource, including activities for which an exemption has been issued in terms of section 106 of the MPRDA.

EXM Advisory (Pty) Ltd has been appointed as the Independent Environmental Assessment Practitioners (“EAP”) to review the BA Report and to oversee the PPP for the Prospecting Right Application.

This report purpose is supplementary to the Basic Assessment Report submitted; as part of the application for environmental authorisation in terms of NEMA.

Environmental Strategy

Objectives

This EMP provides for the environmental management of all prospecting activities to be undertaken in the Ilahle prospecting area. The objective of the EMP is to detail actions required to address the potential impacts resulting from the identified activities to be undertaken during the establishment, operation and rehabilitation of drilling sites within the prospecting right area. This EMP elaborates on the implementation of the mitigation measures documented in the detailed EMP.

Environmental Impacts

The aim of the EMP is to reduce the significance of negative impacts and enhance positive impacts as far as practicably possible. The overall objectives are thus to:

- Minimize disturbance on the physical environment including the protection of soils, surface water and groundwater during drilling operations;
- Minimize disturbance to the ecological environment and prevent disturbance to sensitive sites;
- prevent disturbance of sites of cultural and historical importance;
- Minimize disturbance to current land uses and neighboring activities;
- Provide for a forum for consultation with land owners and affected parties; and
- Facilitate socio-economic development where practicable.

Rehabilitation

Prospecting activities are to be undertaken in a manner which facilitates site rehabilitation and the restoration of pre-disturbance land capabilities. The primary objectives for rehabilitation include the:

- Removal of all infrastructure and material introduced to site;
- Removal of all wastes and their appropriate disposal;
- Promotion of the rapid re- establishment of natural vegetation and the restoration of site ecology;
- Facilitation of the re-establishment of the land use and land capability to as close as reasonably possible to the original conditions.

Action Plan

The various actions that need to be implemented, to ensure that the environmental objectives are met, are detailed in the EMP. The actions are aimed at preventing or mitigating environmental impacts and implementing the rehabilitation plan. The management actions are stated in a manner that ensures that they can be audited during the performance assessment programme.

1.1.1 Time Schedule

Time-frames detail the implementation schedule of management actions. The successful implementation and commencement within the timeframes is to be monitored as part of the performance assessment programme.

1.1.2 Requirements for Implementation

Additional measures that will need to be put in place to allow for the successful implementation of the action plan are listed where relevant.

Environmental Management Plan

The EMP presents the actions that need to be implemented to address the potential impacts resulting from the identified activities to be undertaken during the establishment, operation and rehabilitation of drilling sites within the prospecting right area. The management actions are stated in a manner that ensures that they can be audited during the performance assessment programme. Once approved by the relevant authorities, the provisions of the EMP are legally binding on the project applicant and all its contractors and suppliers.

Programme

Table 3: Environmental Management Programme

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
Biodiversity							
Removal of vegetation and potential impact on protected species.	Minimise disturbance of natural habitat	None	<ul style="list-style-type: none"> • Preference should be given to already disturbed areas, if possible. • No-go areas to be identified. • No prospecting to be conducted on ridges or valleys. • Environmental awareness training of all employees responsible for drilling. • Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas. 	Part of training and awareness during environmental induction programme	On-going	Contractor	During prospecting and site establishment

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
			<ul style="list-style-type: none"> • No activities to be conducted within the 100m buffer zones around wetlands • Site selection aimed at minimising disturbance to natural vegetation. No smoking at the drilling sites. • Code of conduct to include measures for the prevention of fires. • Emergency equipment and procedures for fire fighting to be in place. • Adhere to emergency procedures. • Site selection aimed at minimising disturbance to sensitive animal habitats and breeding areas • Drilling contractors are only allowed to move within the designated drilling area. • Environmental awareness training should include poaching and disturbance of animals • Monitor areas for proliferation of Alien Invasive Plants during operations and after rehabilitation has been undertaken • Eradication of Alien Invasive Plants as required 				

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
			<ul style="list-style-type: none"> • Disturbance must be minimized and only be allowed in demarcated areas • No activities to be conducted within the irreplaceable CBA 				

Ilahle 4 KZN (Pty) Ltd

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
Current Land Use							

<p>Intrusion due to drilling and prospecting activities in an area where agricultural uses are prominent.</p>	<p>Minimise disturbance of current land use</p>	<p>Prevent impacts on land use</p>	<p>Drilling sites must be selected to minimize disturbance of current land use.</p> <p>Existing farm tracks will be used as far as possible.</p> <p>Consultation must be conducted with landowners to define location and extent of drilling sites and rehabilitation measures that will be undertaken at the end of drilling.</p> <p>Drill sites will not be located within 100 meters of farming infrastructure.</p> <p>Areas where crop cultivation is conducted as well as residential units and other farming structures such as sheds will be avoided by the drilling operations. Appropriate buffers from the residential units and farming structures will be adhered to.</p> <p>Where economic land use such as crops (if any) will be affected, the land owners will be consulted prior to the commencement of drilling. Compensation for potential disturbance of crops will be discussed as part of the consultation.</p> <p>Concurrent rehabilitation of drill sites.</p> <p>No permanent structures will be established on site.</p>	<p>Access agreement to be implemented</p>		<p>Contractor</p>	<p>During site establishment</p>
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POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
			Appropriate buffers around residential units must be implemented.				
Cultural and heritage resources							
Destruction of cultural and heritage resources	Prevent destruction of cultural and heritage resources	None	Correct procedures must be followed if heritage resources are found on-site.	Part of training and awareness during environmental induction programme	On-going	Contractor	During site establishment
			The Environmental Officer (EO) must conduct a site visit prior to commencement of work to ensure no heritage resources are present on site.				
			Establish 50m buffer where heritage resources are found				
Air quality							
Activities: Vehicles travelling on gravel roads. Windblown dust from bare surfaces.							
Dust fallout and fine particular matter	To reduce the magnitude and extent of dust dispersion.	None	Prospecting vehicles are to travel on gravel at speeds that reduce the potential for entrained dust production (less than 40 km/hr on private gravel roads).	Part of training and awareness during environmental induction programme	On-going	Contractor	During prospecting and site establishment

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
emissions.			Wet gravel roads and exposed areas if dust is found to be excessive.				
Stormwater and soil contamination							
Activities: Storage and use of hazardous substances							
Stormwater contamination	To contain spillage of hazardous chemical substances and prevent the contamination of soils or water resources	None	<p>Bunded areas are to be created for the storage of all hazardous chemical substances (fuel, oil, lubricants and chemicals).</p> <p>Temporary bunds are to include an impervious floor (e.g. plastic sheeting) and earth/sandbag walls.</p> <p>Spill kits must be available on site.</p>	Environmental Induction Programme	On-going	Contractor	During prospecting

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
Groundwater contamination							
Activities: Establish borehole, use of drilling fluid							
Cross contamination of aquifers	Prevent or minimise aquifer contamination	Proper remediation of contamination if required. SANS drinking water standards/ livestock watering	Boreholes that will not be used again will be backfilled with cement and sealed. Mitigation will entail the use of biodegradable or eco friendly drilling liquid. Alternatively, a drilling sock can also be used to soak up any contamination remaining after drilling operations have been completed. Purging of the borehole upon completion or to seal the borehole to prevent further use. The borehole can also be sealed to prevent use of the water for potable purposes.	Environmental Induction Programme	On-going	Contractor	During and after prospecting
Waste management							
Activities: generation and management of general and hazardous waste							
Poor waste management - wind blown litter/environmental pollution	To ensure the appropriate disposal of solid waste to prevent the contamination of soils and water	None	Separate, marked receptacles are to be provided for the storage of hazardous and general wastes at the waste generation points. Littering is not to be permitted.	Appropriate housekeeping	Inspect waste storage area on a weekly basis	Contractor ECO	During prospecting

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA (TARGETS)	MITIGATION MEASURE(S)	REQUIREMENTS FOR IMPLEMENTATION	MONITORING AND INSPECTIONS	RESPONSIBLE PERSON / PARTY	TIME-FRAME
	resources.		Measures for waste avoidance, minimisation, reuse and recycling must be implemented. All items that have come into contact with any hazardous chemical substance (including fuels/oils/greases/laboratory chemicals, sludge) are to be disposed as hazardous waste. All other substances are to be disposed of as general waste.				
Natural resources							
Activities: Construction activities and footprint of the site							
Use of natural resources such as water and electricity	Minimise resource consumption	None	No running taps to be left unattended. Switch off lights when not in use.	Awareness	None	Contractor ECO	During prospecting
Noise generation							
Activities: Health and safety							
Noise Pollution Occupational exposure	Non-exceedance of prescribed noise levels	Occupational exposure limits	Keep noise levels as low as possible. Maintain complaints register PPE must be provided to all employees	Employees must be informed	None	Contractor ECO	During prospecting

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA	MITIGATION MEASURE(S)	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	TIME-FRAME
Safety and security						
Activities: Drilling						
Safety and security concerns due to increased activity on site	Prevent safety incidences	No incidences	<ul style="list-style-type: none"> • Drilling contractors not allowed moving outside of designated areas. • Access of personnel related to the prospecting operations will only be allowed on approval by the project manager. • All personnel that have access to the property will be provided with access cards. • All personnel that have access to the property need to be made visible. • Drilling contractors to be housed off site. 	None	Contractor ECO	During prospecting
Rehabilitation						
Activities: Drilling						
Land degradation	To return land to a condition as close as is reasonably possible to pre-prospecting land use potential.	None	<p>Remove all waste, temporary structures, equipment and surplus materials upon completion of prospecting activities.</p> <p>Requests from landowners to retain infrastructure created during prospecting activities may be considered.</p>	Inspect site to monitor success of rehabilitation	ECO Operational manager	Commence within 2 weeks of completion of prospecting activities at any particular site.

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA	MITIGATION MEASURE(S)	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	TIME-FRAME
			<p>Areas contaminated with hydrocarbons are to be treated in situ using a commercially available bio-remediation product.</p> <p>Soil and topsoil is to be returned to areas from where it was removed and the land shaped to its original form.</p> <p>Waste is to be removed from site and disposed of at a recognised facility.</p> <p>Appropriate, locally adapted vegetation should be established on all disturbed sites (unless the site is located in croplands).</p>			
Monitoring and Maintenance						
Activities:						
Water contamination	To monitor use of drilling water and additives.	None	<p>Record the volume of water added to the drill hole.</p> <p>Record the type and volume of additives used.</p>	Daily	ECO	For the duration of the project
Land degradation	To monitor and maintain rehabilitated sites	Success of vegetation growth	The establishment of vegetation in denuded areas, including invasion by alien vegetation, is to be monitored.	Bi- annually Prior to closure	ECO	Prior to closure

Ilahle 4 KZN (Pty) Ltd

POTENTIAL IMPACT	OBJECTIVES	PERFORMANCE CRITERIA	MITIGATION MEASURE(S)	MONITORING AND INSPECTIONS	RESPONSIBLE PARTY	TIME-FRAME
Infestation of alien plants	Prevent spreading of alien plants	None	Alien vegetation is to be physically/chemically removed (depending on the species) from rehabilitated areas.	Bi- annually Prior to closure	ECO	During and after rehabilitation
Soil erosion	Prevent further erosion on site	None	The erosion of areas disturbed during drilling is to be monitored.	Bi- annually Prior to closure	ECO	During and after rehabilitation
			Eroded areas must be repaired and measures put in place to limit further erosion.		ECO	During and after rehabilitation
Land degradation	To monitor and maintain rehabilitated sites	Success of vegetation growth	Where vegetation has not established within 6 months of rehabilitation, a locally occurring seed mix/plants and fertilizers are to be used to augment vegetation recovery as required.	Bi- annually Prior to closure	ECO	During and after rehabilitation

1.2 Emergency Procedures

Emergency procedures indicate the actions to be taken in the case of an environmental emergency. An environmental emergency refers to an event that could result in a pollution incident or damage to the biophysical or social environment including surrounding habitats or land use. The environmental emergency procedures required as a result of the proposed prospecting activities have been identified in the EMP (Table 2).

1.2.1 Fire

The following are to be included as key criteria of the emergency procedure:

- The making of fires for cooking, warmth or any other purposes is strictly prohibited.
- Firefighting equipment, including fire-extinguishers and fire beaters, are to be kept on site.
 - At least one fire extinguisher at the drilling sites.
 - Three fire beaters at both the drilling sites.
- Contact details of the land owner, neighboring land owners as well as the local fire department are to be kept on hand at the drilling sites.

In the event of a fire starting on site, the following steps are to be implemented:

- Attempt to extinguish or contain the fire, using the beaters or extinguishers. Elicit help of staff in the area.
- If the fire cannot be extinguished or contained using these measures, the Site Manager is to be contacted and notified of the location and extent of fire.
- In the case of a fire occurring in close proximity to a methane-rich borehole site, stop the drilling and cap the borehole to prevent gaseous emissions come into contact with the fire.
- All flammable substances in the path of the fire are to be removed.
- Notify the land owner of the fire and elicit assistance in fighting the fire.
- Mobilize staff to utilize the plant equipment and the water cart, plus any other fire extinguishing media to extinguish or contain the fire.
- Contact the local firefighting emergency service to assist in fighting the fire.
- Contact neighboring land owners who have property in the path of the fire.
- The incident is to be reported as part of the incident reporting procedure. The cause is to be investigated and measures put in place to prevent such an incident from re-occurring.

1.2.2 Spillage of a fuel, oil, lubricant or any other chemical substance

The following are to be included as key criteria of the emergency procedure:

- Hydro-carbons and chemicals required on-site must be stored or handled over a bunded, impervious surface.
- Material safety data (MSD) sheets are to be available for all hazardous chemicals stored on site. These should be kept in close proximity to where the chemicals are stored on site. Ensure that the MSD sheets contain sufficient information on environmental risks and clean-up measures.

- Spill kits are to be purchased and kept on site in close proximity to fuel/oil/lubricant storage areas. These should include a bucket, absorbent material (sand or commercial product such as Peatsorb) and a spade.
- A commercially available product for the treatment of soils contaminated with hydrocarbons is to be purchased and kept on site.

In the event of a chemical spill taking place on site, the following actions should take place:

- Close, seal or otherwise prevent further spillage from the source.
- Take reasonable steps to contain the spilled product. This may include the construction of earth berms. Attention should be given to the protection of watercourses and drainage lines.
- Notify the Site Manager of the spill.
- Lift as much of the spilled material as practical.
- In the case of a hydrocarbon spill, add an absorbent material to remove the remaining material.
- In the case of any other chemical spill, handle and remove the material in accordance with the MSD requirements.
- Place all spilled material and absorbent material used in clean-up in a container for disposal as hazardous waste.
- In the case of a hydrocarbon spill, treat any contaminated soil in the footprint area with a suitable, commercially available product for the in situ remediation of such spills.
- The incident is to be reported as part of the incident reporting procedure. The cause is to be investigated and measures put in place to prevent such an incident from re-occurring.

**Appendix 6:
Final Rehabilitation, Decommissioning and Mine Closure Plan**

**Appendix 7:
Latent Environmental Risk Report.**