

CLOSURE PLAN FOR THE CLOSURE OF THE IMBASA PROSPECTING RIGHT

Hartebeestpoort B 410 JQ

SUBMITTED FOR APPLICATION FOR A CLOSURE CERTIFICATE IN TERMS OF SECTION
43 OF THE MPRDA

MARCH 2020

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Alex Pheiffer
Reviewer (PrSciNat, registered EAP)

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CLOSURE PLAN FOR THE CLOSURE OF THE IMBASA PROSPECTING RIGHT

EXECUTIVE SUMMARY

PROJECT BACKGROUND

Imbasa Platinum Pty (Ltd) (Imbasa) holds a prospecting right (DMRE reference number (NW30/5/1/1/2/424 PR) for all minerals on various portions of the farm Hartebeestpoort B 410 JQ. This prospecting right is referred to as the Imbasa prospecting right. The prospecting area is approximately 7 km west of Brits within the Madibeng Local Municipality and Bojanala Platinum District Municipality in the North West Province (Figure 1). The regional and local settings are illustrated in Figure 1 and Figure 2 respectively. The abovementioned prospecting right is included in Appendix A.

Between 2004 and 2014, Imbasa undertook prospecting activities on the farm Hartebeestpoort B 410 JQ, during which time 24 approved exploration drill holes were drilled.

After completion of the pre-feasibility work, the Imbasa Board made the decision not to apply for a mining right and commence with mining, as it was found that the project is not economically viable at the expected economic parameters (i.e. cost, funding, prices). Imbasa has decided to exit from this prospecting right and as such is undertaking a closure application process. The areas disturbed by the prospecting activities have been allowed to re-vegetate and would be used by landowners and land users as was done prior to the prospecting activities.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Imbasa Platinum (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Imbasa prospecting right.

SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the prospecting right, the following is required:

- A Closure Certificate from the DMRE in terms of Section 43(4) of the MPRDA; and
- An environmental authorisation from the DMRE in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended. The relevant listed activity is Activity 22 of Listing Notice 1: The decommissioning of any activity requiring a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced prior to the submission of the Closure Plan Report and has continued throughout the environmental assessment process. As part of this process, commenting authorities and interested and affected parties (I&APs) were given the opportunity to review the background information document (BID) and now the draft Closure Plan Report and submit questions and comments to the project team. All comments submitted to date by the commenting authorities and I&APs have been included and addressed in the Closure Plan Report. Further comments arising during the review of the Closure Plan Report will be handled in a similar manner.

This draft Closure Report Plan has been distributed for a 30-day comment period from **17 March to 20 April 2020** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the closure process. Copies of the full report are available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>). Hard copies of the report as well as summary documents (in English and Setswana) are available at the Madibeng Ward 40 Councillor Offices, Bakwena Ba Mokgopa Tribal Office and Segwaelane Clinic. Summaries will also be emailed to I&APs registered on the project database. Electronic copies (compact disk) of the report are available from SLR, at the contact details provided below. In addition, I&APs will be notified via SMS that the Closure Plan Report and/or summary is available for review.

All comments received during the review process will be addressed in the final Closure Plan Report that is submitted to the DMRE for decision-making.

SLR Consulting (Africa) (Pty) Ltd
 Attention: Reinett Mogotshi

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IMPACTS AND MANAGEMENT ACTIONS

This section provides a summary of the assessment of the potential impacts. The potential impacts/risks have been assessed against the Imbasa prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. Given that decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed, this assessment focusses on potential residual impacts/risks as a result of the rehabilitation phase only. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr, therefore the assessment of the mitigated scenario is where additional mitigation measures are deemed necessary. The table below provides a summary of the potential impacts in no particular order of importance.

Aspect	Potential impact	Reference to mitigation measures	Significance (takes into account measures implemented as per approved EMPr)	
			Unmitigated	Mitigated
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Not Applicable
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable

ENVIRONMENTAL STATEMENT

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BIC	Bushveld Igneous Complex
BID	Background Information Document
CO	Carbon Monoxide
DEA	Department of Environmental Affairs
DMRE	Department of Mineral Resources and Energy
DRDLR	Department of Rural Development and Land Reform
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
I&APs	Interested and Affected Parties
IAIASa	International Association of Impact Assessment South Africa
IDP	Integrated Development Planning
MAR	Mean Annual Rainfall
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act, Act 25 of 1999
PM	Particulate Matter
PR	Prospecting Right
SACNASP	South African Council for Natural Scientific Professions
SAHRIS	South African Heritage Resources Information System
SLR	SLR Consulting (Africa) (Pty) Ltd
SO ₂	Sulphur Dioxide

1 INTRODUCTION

This chapter provides a brief description of the project background, describes the purpose of this report, summarises the legislative authorisation requirements, provides the study terms of reference and outlines the opportunity for comment.

1.1 PROJECT OVERVIEW

Imbasa Platinum Pty (Ltd) (Imbasa) holds a prospecting right (DMRE reference number (NW30/5/1/1/2/424 PR) for all minerals on various portions of the farm Hartebeestpoort B 410 JQ. This prospecting right is referred to as the Imbasa prospecting right. The prospecting area is approximately 7 km west of Brits within the Madibeng Local Municipality and Bojanala Platinum District Municipality in the North West Province (Figure 1). The regional and local settings are illustrated in Figure 1 and Figure 2 respectively. The abovementioned prospecting right is included in Appendix A.

Between 2004 and 2014, Imbasa undertook prospecting activities on the farm Hartebeestpoort B 410 JQ, during which time 24 approved exploration drill holes were drilled.

After completion of the pre-feasibility work, the Imbasa Board made the decision not to apply for a mining right and commence with mining, as it was found that the project is not economically viable at the expected economic parameters (i.e. cost, funding, prices). Imbasa has decided to exit from this prospecting right and as such is undertaking a closure application process.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Imbasa Platinum (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Imbasa prospecting right.

1.2 PURPOSE OF THIS REPORT

This Closure Plan has been compiled and distributed for review and comment as part of the process to apply for a closure certificate in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) (MPRDA) as amended. The closure application process is being undertaken for the closure of the Imbasa Prospecting Right, near Brits in the North West Province.

This Closure Plan provides a description of the proposed closure project and the affected environment; summarises the closure process followed to date; identifies and assesses the key risks associated with closing the prospecting right and presents a closure plan for the project.

Interested and Affected Parties (I&APs) are being asked to comment on the draft Closure Plan Report (see Section 1.5 below). This document will then be updated into a final report, giving due consideration to the comments received. The final Closure Plan Report will be submitted to the Department of Mineral Resources and Energy (DMRE) for consideration as part of the closure application in terms of Section 43 of the MPRDA, as amended.

1.3 SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the proposed prospecting right, the following is required:

- A Closure Certificate from the DMRE in terms of Section 43(4) of the MPRDA; and
- An environmental authorisation from the DMRE in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

1.4 TERMS OF REFERENCE

In terms of Regulation 57, Application for a Closure Certificate, the following is required and has been included as part of this report:

- A Closure Plan contemplated in regulation 62 – This report
- An environmental risk report contemplated in regulation 60 – Section 8.2.5
- A final performance assessment report contemplated in regulation 55(9) – Section 8.2.4
- A completed application form contemplated in regulation 58(1) (Form P) – Appendix F

1.5 OPPORTUNITY TO COMMENT

This draft Closure Plan Report has been distributed for a 30-day comment period from **17 March to 20 April 2020** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the closure process. Copies of the full report are available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and hard copies as well as summary documents (in English and Setswana) are available at the Madibeng Ward 40 Councillor Offices, Bakwena Ba Mokgopa Tribal Office and Segwaelane Clinic. Summaries will also be emailed to I&APs registered on the project database. Electronic copies (compact disk) of the report were available from SLR, at the contact details provided below. In addition, I&APs will be notified via SMS that the Closure Plan Report and/or summary is available for review.

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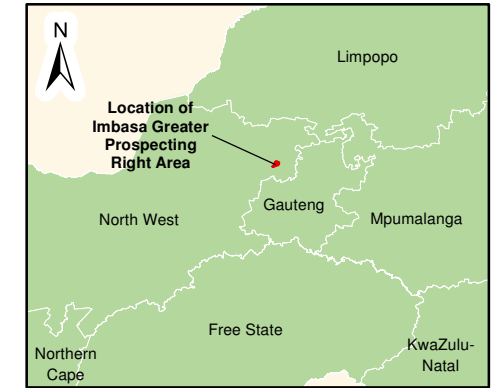
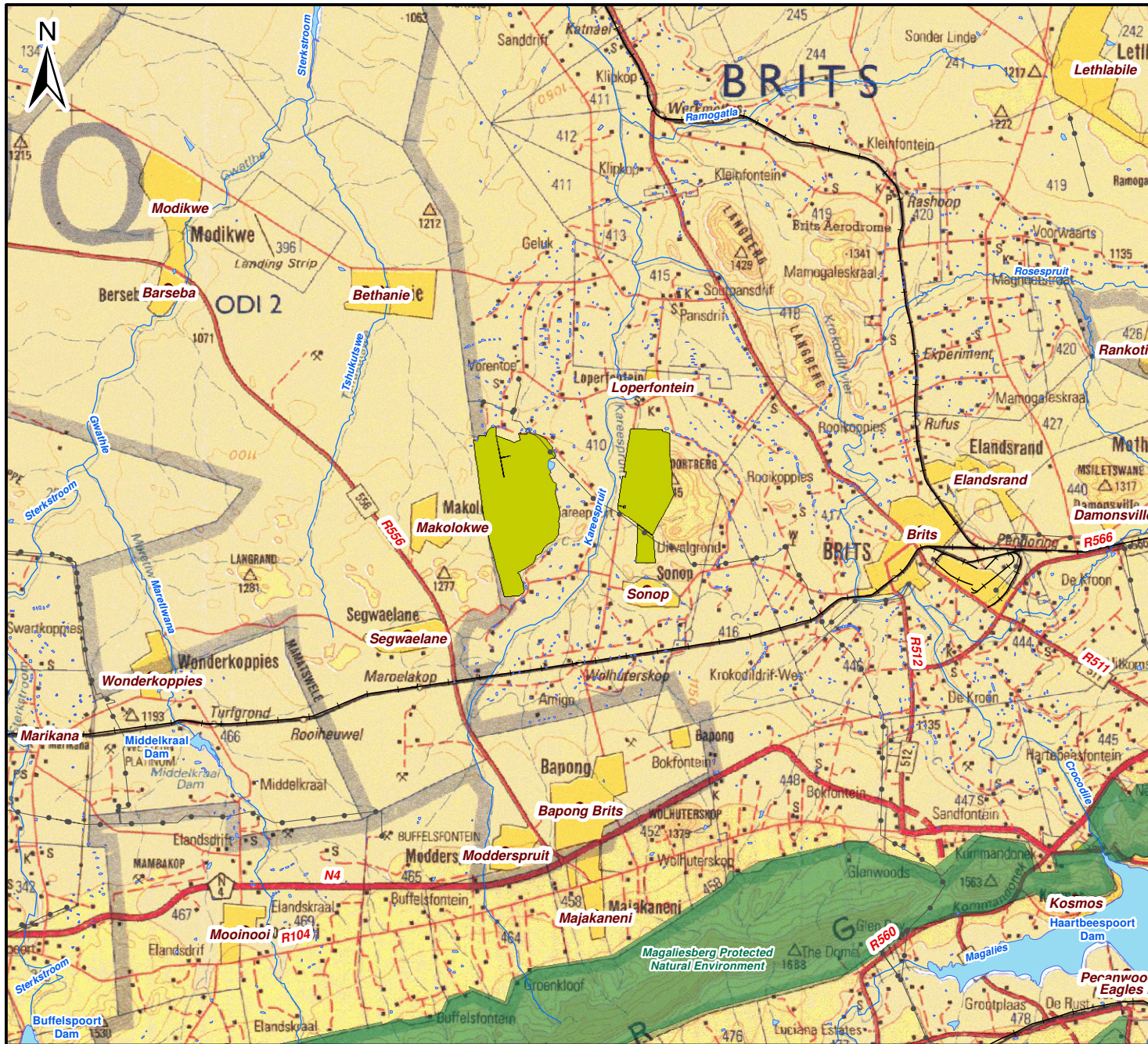
E-mail: rmogotshi@slrconsulting.com

2 LOCATION OF APPLICATION AREA

A description of the property on which the proposed project is located is provided in Table 2-1. The regional and local settings are illustrated in Figure 1 and Figure 2, respectively. The locations of the drill holes are illustrated in Figure 3.

TABLE 2-1: DESCRIPTION OF THE PROPERTY

Description	Details																																							
Farm Name	Hartebeestpoort B 410 JQ																																							
Closure application area (ha)	The Imbasa prospecting right area covers an area of approximately 1 673 ha																																							
Magisterial district	The prospecting right area is located within the Madibeng Local Municipality and in the Bojanala Platinum District Municipality.																																							
Distance and direction from nearest town	The proposed project site is located approximately 7 km west of Brits (Refer to Figure 1).																																							
21-digit Surveyor General Code for each farm portion	<table border="1"> <tbody> <tr> <td>TOJK00000000041001216</td> <td>TOJK00000000041001127</td> <td>TOJK00000000041001121</td> </tr> <tr> <td>TOJK00000000041001217</td> <td>TOJK00000000041001126</td> <td>TOJK00000000041001120</td> </tr> <tr> <td>TOJK00000000041001220</td> <td>TOJK00000000041001125</td> <td>TOJK00000000041001119</td> </tr> <tr> <td>TOJK00000000041001218</td> <td>TOJK00000000041001124</td> <td>TOJK00000000041001118</td> </tr> <tr> <td>TOJK00000000041001219</td> <td>TOJK00000000041001123</td> <td>TOJK00000000041001212</td> </tr> <tr> <td>TOJK00000000041001221</td> <td>TOJK00000000041001178</td> <td>TOJK00000000041001374</td> </tr> <tr> <td>TOJK00000000041001215</td> <td>TOJK00000000041001179</td> <td>TOJK00000000041001373</td> </tr> <tr> <td>TOJK00000000041001214</td> <td>TOJK00000000041001180</td> <td>OJK00000000041001222</td> </tr> <tr> <td>TOJK00000000041001122</td> <td>TOJK00000000041001181</td> <td>TOJK00000000041001129</td> </tr> <tr> <td>TOJK00000000041001223</td> <td>TOJK00000000041001182</td> <td>TOJK00000000041001130</td> </tr> <tr> <td>TOJK00000000041001224</td> <td>TOJK00000000041001183</td> <td>TOJK00000000041001128</td> </tr> <tr> <td>TOJK00000000041001213</td> <td>TOJK00000000041001161</td> <td>TOJK00000000041001151</td> </tr> <tr> <td>TOJK00000000041001131</td> <td>TOJK00000000041001155</td> <td>TOJK00000000041001122</td> </tr> </tbody> </table>	TOJK00000000041001216	TOJK00000000041001127	TOJK00000000041001121	TOJK00000000041001217	TOJK00000000041001126	TOJK00000000041001120	TOJK00000000041001220	TOJK00000000041001125	TOJK00000000041001119	TOJK00000000041001218	TOJK00000000041001124	TOJK00000000041001118	TOJK00000000041001219	TOJK00000000041001123	TOJK00000000041001212	TOJK00000000041001221	TOJK00000000041001178	TOJK00000000041001374	TOJK00000000041001215	TOJK00000000041001179	TOJK00000000041001373	TOJK00000000041001214	TOJK00000000041001180	OJK00000000041001222	TOJK00000000041001122	TOJK00000000041001181	TOJK00000000041001129	TOJK00000000041001223	TOJK00000000041001182	TOJK00000000041001130	TOJK00000000041001224	TOJK00000000041001183	TOJK00000000041001128	TOJK00000000041001213	TOJK00000000041001161	TOJK00000000041001151	TOJK00000000041001131	TOJK00000000041001155	TOJK00000000041001122
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Co-ordinates (Refer to Figure 2)	A: 27°38'45.598"E 25°38'56.704"S B: 27°38'8.33"E 25°36'5.308"S C: 27°38'46.908"E 25°36'3.559"S D: 27°39'26.463"E 25°35'58.642"S E: 27°39'51.473"E 25°37'49.591"S F: 27°39'9.979"E 25°38'52.081"S G: 27°41'25.768"E 25°38'19.402"S H: 27°41'2.775"E 25°37'21.045"S I: 27°41'18.195"E 25°35'51.13"S J: 27°42'6.019"E 25°35'55.869"S K: 27°42'11.894"E 25°37'4.013"S L: 27°41'49.177"E 25°38'19.517"S																																							



Legend

- Imbasa Greater Prospecting Right Area
- Main Roads
- Rivers
- Railway Lines
- Power Lines
- Dams
- Protected Areas (SAPAD 2019)

0 1 2 3 4 5 6 7 Km
 Scale: 1:200 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartbeeshoek, Lo27

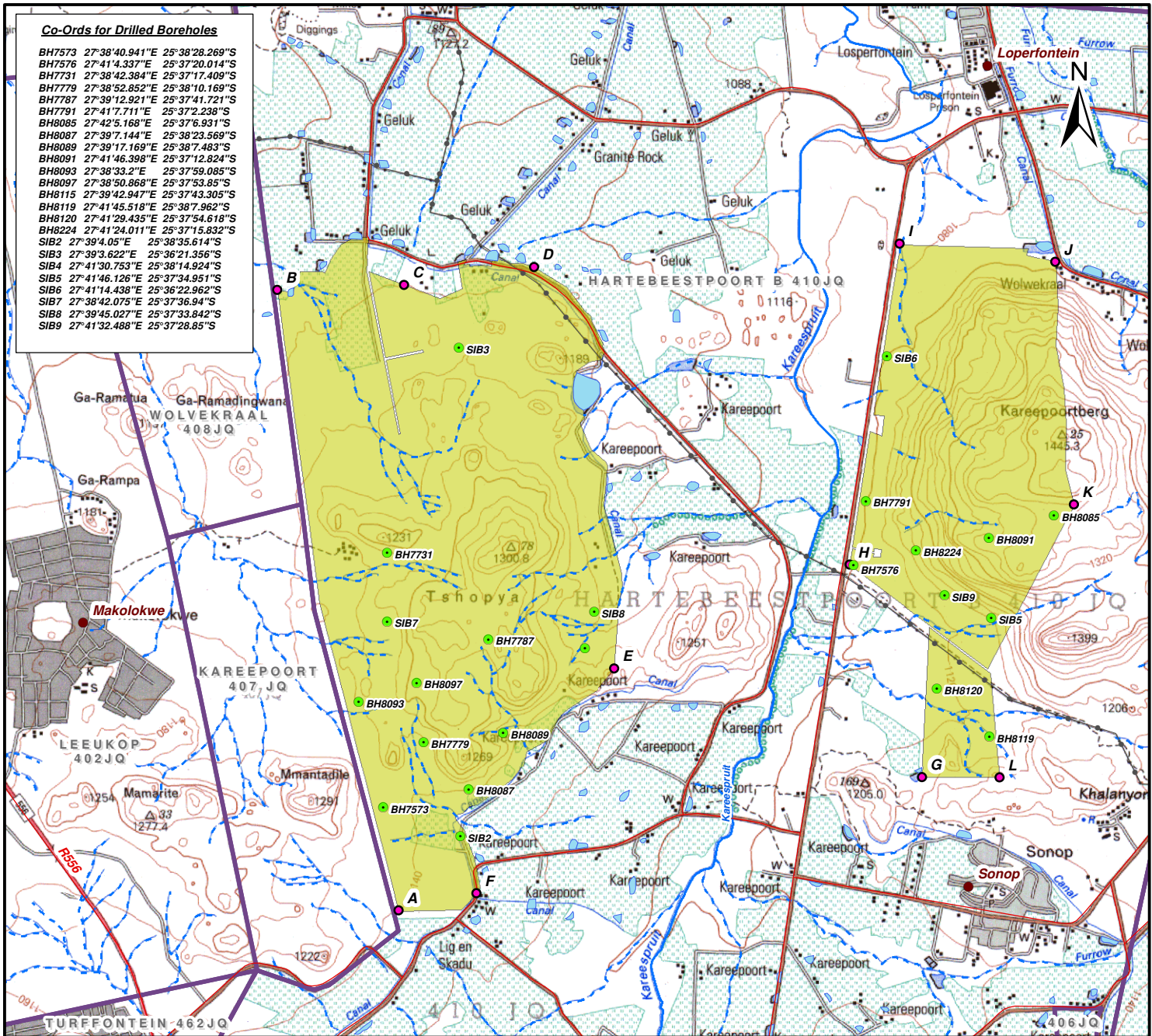
Imbasa Platinum (Pty) Ltd

Figure 1

Regional Setting of Imbasa Greater Prospecting Right Closure



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Co-Ords for Drilled Boreholes

BH7573	27°38'40.941"E	25°38'28.269"S
BH7576	27°41'4.337"E	25°37'20.014"S
BH7731	27°38'42.384"E	25°37'17.409"S
BH7779	27°38'52.852"E	25°38'10.169"S
BH7787	27°39'12.921"E	25°37'41.721"S
BH7791	27°41'7.711"E	25°37'2.238"S
BH8085	27°42'5.168"E	25°37'6.931"S
BH8087	27°39'7.144"E	25°38'23.569"S
BH8089	27°39'17.169"E	25°38'7.483"S
BH8091	27°41'46.398"E	25°37'12.824"S
BH8093	27°38'33.2"E	25°37'59.085"S
BH8097	27°38'50.688"E	25°37'53.85"S
BH8115	27°39'42.947"E	25°37'43.305"S
BH8119	27°41'45.518"E	25°38'7.862"S
BH8120	27°41'29.435"E	25°37'54.618"S
BH8224	27°41'24.011"E	25°37'15.832"S
SIB2	27°39'4.05"E	25°38'35.614"S
SIB3	27°39'3.622"E	25°36'21.356"S
SIB4	27°41'30.753"E	25°38'14.924"S
SIB5	27°41'46.126"E	25°37'34.951"S
SIB6	27°41'14.438"E	25°36'22.962"S
SIB7	27°38'42.075"E	25°37'36.94"S
SIB8	27°39'45.027"E	25°37'33.842"S
SIB9	27°41'32.488"E	25°37'28.85"S

Legend

- Villages / Towns
- ▭ Farm Boundaries
- Roads
- Power Lines
- Railway Lines
- Perennial Rivers
- - - Non-Perennial Rivers
- Dams
- Imbasa Greater Prospecting Right Area
- Drill Sites

Co-Ords for Imbasa Prospecting Right area

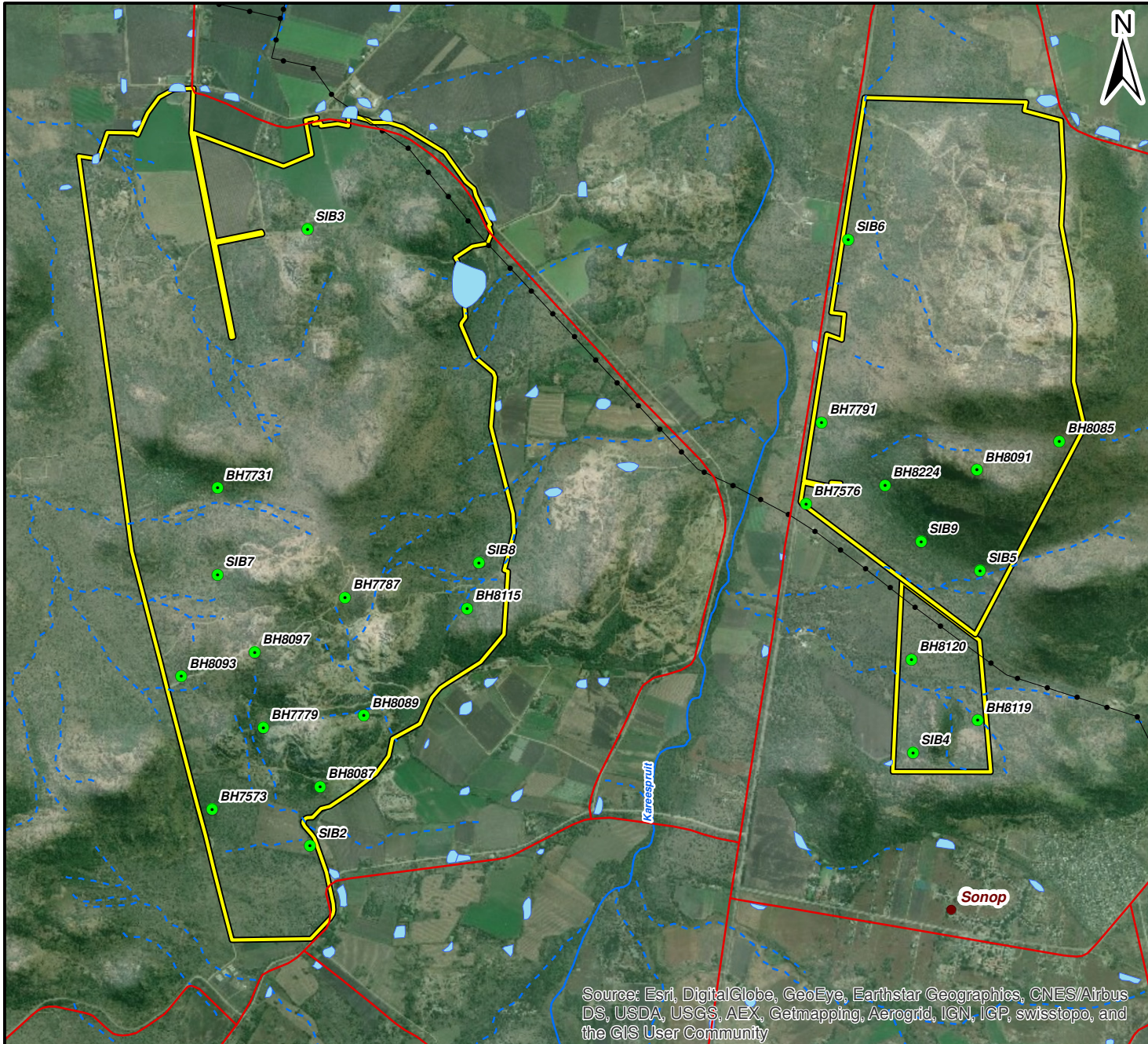
A	227°38'45.598"E	25°38'56.704"S
B	27°38'8.33"E	25°36'5.308"S
C	27°38'46.908"E	25°36'3.559"S
D	27°39'26.463"E	25°35'58.642"S
E	27°39'51.473"E	25°37'49.591"S
F	27°39'9.973"E	25°38'52.081"S
G	27°41'25.768"E	25°38'19.402"S
H	27°41'2.775"E	25°37'21.045"S
I	27°41'18.195"E	25°35'51.13"S
J	27°42'6.019"E	25°35'55.869"S
K	27°42'11.894"E	25°37'4.013"S
L	27°41'49.177"E	25°38'19.517"S

0 1 Km
 Scale: 1:50 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartbeeshoek, Lo27

Imbasa Platinum (Pty) Ltd

Figure 2
Local Setting of Imbasa Prospecting Right Closure

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, ICP, swisstopo, and the GIS User Community

Legend

- Villages / Towns
- Roads
- Perennial Rivers
- - - Non-Perennial Rivers
- Dams
- Imbasa Greater Prospecting Right Area
- Drill Sites

0 1 Km
 Scale: 1:40 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartebeeshoek, Lo27

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Figure 3

Layout of Decommissioned Prospecting Drill Sites



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2020/02/28

3 DETAILS OF THE APPLICANT AND THE EAP

3.1 APPLICANT DETAILS

The applicant for the project is the Imbasa Platinum (Pty) Ltd. Details are provided in Table 3-1 below.

TABLE 3-1: APPLICANT DETAILS

Name:	Imbasa Platinum (Pty) Ltd
Address:	2 Fricker Road, Illovo, 2196, Johannesburg.
Contact No.	014 569 7638
Responsible person:	Philip Fouché

3.2 DETAILS OF THE EAP WHO PREPARED THE REPORT

As noted in Chapter 1, SLR has been appointed as the independent EAP to undertake the process for the proposed closure of the prospecting right. The details of the EAP project team that are undertaking this closure process are provided in Table 3-2.

SLR has no vested interest in the proposed project other than fair payment for consulting services rendered as part of the closure process. An undertaking by SLR is provided in Section 18.

TABLE 3-2: DETAILS OF THE CLOSURE PLAN PROJECT TEAM

General		
Organisation	SLR Consulting (Africa) (Pty) Ltd	
Postal address	PO Box 1596, Cramerview, 2060	
Tel No.	(011) 467 0945	
Fax No.	(011) 467 0978	
Name	Tasks and roles	Email
Alex Pheiffer (SLR)	BAR, EMPPr, Closure plan and process reviewer	apheiffer@slrconsulting.com
Stephen van Niekerk (SLR)	Financial provision reviewer	svanniekerk@slrconsulting.com
Caitlin Hird and Reinett Mogotshi (SLR)	Management of the BA process, including public consultation, process review and report compilation	chird@slrconsulting.com rmogotshi@slrconsulting.com

3.3 EXPERTISE OF THE EAP

Alex Pheiffer holds a Master's degree in Environmental Management (from the Rand Afrikaans University) and has over 17 years of experience in a range of environmental disciplines, including EIAs, Licensing, Environmental Auditing and Monitoring, Due Diligence and Reviews and Public Consultation. She has expertise in a wide range of projects. She is a Registered PrSciNat (Environmental Science), registered Environmental Assessment Practitioner with Environmental Assessment Practitioners Association of South Africa (EAPASA) and is a member of the International Association of Impact Assessment South Africa (IAIASa).

Caitlin Hird holds an Honours degree in Geography and Environmental Management (from the University of Cape Town) and has approximately 9 years of relevant experience in environmental permitting of green and brownfield projects in Southern Africa. Caitlin is a member of the IAIASa.

Reinett Mogotshi holds an Honours degree in Environmental Analysis and Management (from the University of Pretoria) and has 5 years of experience in both public and private sectors, primarily agriculture, oil and gas, telecommunication, infrastructure, renewable energy and mining. Her focus is execution and management of environmental authorisation processes and waste management. She is a Registered Cand.Sci.Nat (Environmental Science) and is a member of the [IAIAsa](#).

Relevant curricula vitae (including proof of registrations) are attached in Appendix B

4 MOTIVATION FOR CLOSURE OF THE PROSPECTING RIGHT

After completion of the pre-feasibility work, the Imbasa Board made the decision not to apply for a mining right and commence with mining, as it was found that the project is not economically viable at the expected economic parameters (i.e. cost, funding, prices). Imbasa has decided to exit from this prospecting right and as such is undertaking a closure application process.

5 CLOSURE OBJECTIVES

The closure objective is to return land disturbed by the prospecting operations to its pre-disturbed state. In this case, the pre-disturbed state was that of:

- Open veld used for grazing and cultivation;
- Natural bushveld;
- Granite mining; and
- Isolated farmsteads and service infrastructure such as tarred and gravel roads (public/private roads) as well as a powerline that traverses the prospecting right area in a north westerly/south easterly direction.

5.1.1 Confirmation that closure objectives have been consulted with landowners and I&APs

The intended final land use was outlined in the BID made available to I&APs for review and initial comment. No comments relating to land use have been received to date. The closure objective and closure plan for the prospecting right area is outlined in this report which will be made available to landowners and I&APs for review and comment (see Section 15 for further details).

Comments received from I&APs have been summarised in Section 15.5 and included in full in Appendix C of this report.

5.1.2 Regulatory requirements and conditions for closure

The regulatory requirements for closure are included in Section 15.

The conditions for closure are outlined below:

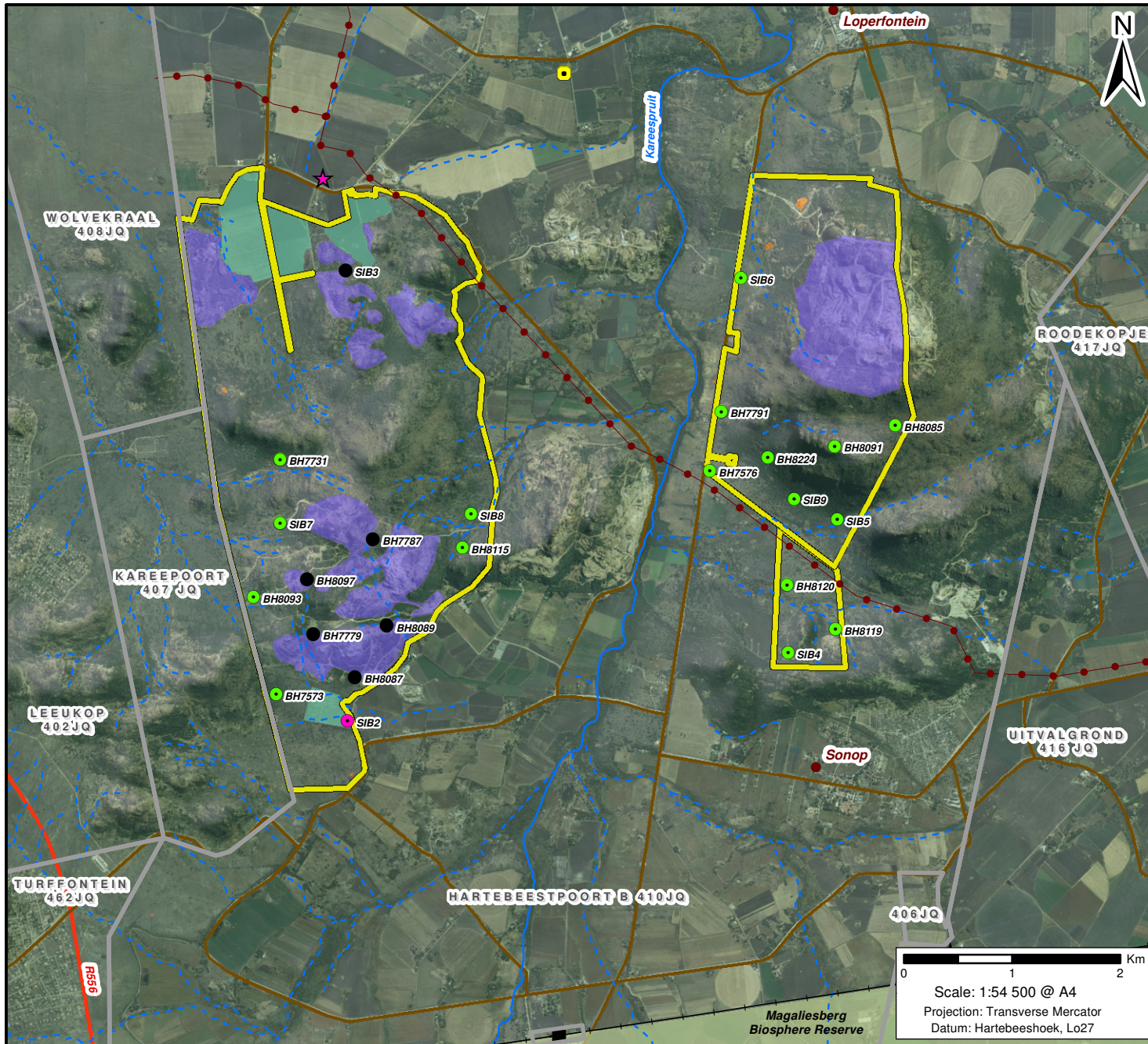
- Achieve physical stability over all landscapes disturbed by prospecting activities;
- Return land to its pre-disturbance potential; and
- Maximise visual 'harmony' with the surrounding landscape.

5.1.3 Rehabilitation plan

Rehabilitation of the prospecting sites has been undertaken as outlined in Section 9 and Section 10.1. In accordance with the MPRDA Closure Plan requirements (Regulation 62b), a plan showing the area under closure including the final and future land use is presented in Figure 4.

5.1.4 Compatibility of the rehabilitation plan with the closure objectives

It can be confirmed that the rehabilitation plan is compatible with the closure objectives given that the closure objectives were taken into account during the determination of the financial provision.



Legend

- Imbasa Greater Prospecting Right Area
 - Villages / Towns
 - ★ Ruins
 - Telecom Tower
 - Railway Stations
 - Railway Lines
 - Regional Roads
 - Secondary Roads
 - Perennial Rivers
 - Non-Perennial Rivers
 - Power Lines
 - Farm Boundaries
 - SA Conservation Areas 2019
 - Agricultural Areas
 - Granite Quarrying
 - Farmsteads and Houses
- Drill Sites Within**
- Natural Vegetation
 - Cultivated Areas
 - Granite Quarrying

Inkosi Platinum (Pty) Ltd

Figure 4

Land Use

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2020/03/03

6 PLAN OF AREA UNDER CLOSURE

A plan showing the area under closure including the final land use is presented in Figure 4

7 REGULATORY REQUIREMENTS AND CONDITIONS FOR CLOSURE

This chapter outlines the key legislative requirements applicable to the proposed project and outlines the guidelines, policies and plans that have been taken into account during the closure application process.

7.1 LEGISLATIVE CONSIDERATION IN THE PREPARATION OF THE CLOSURE REPORT

Table 7-1 below provides a summary of the applicable legislative context.

TABLE 7-1: LEGAL FRAMEWORK

Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the policy and legislative context?
Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA), as amended and supporting Regulations	Introduction and Table 7-4	An outline of the legislation is presented in Section 7.1. The project will require a closure certificate.
National Environmental Management Act (No. 107 of 1998) (NEMA), as amended and 2014 EIA Regulations, as amended	Section 1.3 and Section 5.1.2	An outline of the legislation is presented in Section 7.1. The project will need to comply with the principles of NEMA. The project also triggers a listed activity.
Financial Provisioning Regulations, 2015 (GN 1147)	Section 12	A Financial Provision is required in line with the NEMA Regulations and the MPRDA Closure Reporting requirements and is included in this report.
Alien Invasive Species Regulations GN 598 of 2014 in terms of the NEM:BA	Section 8.1	These regulations have been used to inform the rehabilitation of the site.
Alien and Invasive Species List, GN 864 of 2016		
National Heritage Resources Act (No 25 of 1999).		

7.1.1 Mineral and Petroleum Resources Development Act, 2002 and Regulations (No. 28 of 2002)

The Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA) governs the acquisition, use and disposal of mineral and petroleum resources. Section 43 of the MPRDA governs the issuing of a closure certificate. In this regard, the holder of a prospecting right remains responsible for any environmental liability, pollution, ecological degradation, the pumping and treatment of extraneous water, compliance to the conditions of the environmental authorisation and the management and sustainable closure thereof, until the Minister has issued a closure certificate in terms of the Act to the holder of the prospecting right.

Upon the lapsing, abandonment or cancellation of the right the holder of a prospecting right must apply for a closure certificate.

No closure certificate may be issued unless:

- the Council for Geoscience has confirmed in writing that complete and correct prospecting reports in terms of Section 21(1) of the MPRDA have been submitted to the Council for Geoscience;
- the complete and correct records, drill hole core data or core-log data that the Council of Geoscience may deem relevant, have been lodged with the Council for Geoscience; or
- in the case of the holder of a permit or right, the complete and correct surface and the relevant underground geological plans have been lodged with the Council for Geoscience.

Regulation 57 of the Mineral and Petroleum Resources Development Regulations details the requirements for applying for closure certificates by a holder of a prospecting right.

In this regard a closure application must be accompanied by:

- A closure plan contemplated in Regulation 62;
- An environmental risk report contemplated in Regulation 60;
- A final performance assessment report contemplated in Regulation 55(9); and
- A completed application form contemplated in Regulation 57.

The above requirements for application for a closure certificate are addressed in the following sections of this report:

TABLE 7-2: REQUIREMENTS FOR APPLICATION FOR CLOSURE CERTIFICATE

Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA), as amended	Requirement	Reference in the EMPr report
Regulation 62	Closure plan	Refer to Table 7-4
Regulation 60	Environmental risk report	Refer to Sections 318.2.18.2.5
Regulation 55(9)	Final performance assessment report	Refer to Section 8.2.4
Regulation 57	Completed application form (Form P)	Refer to Appendix G

The proposed project is for the closure of a prospecting right. Therefore, the project requires a closure certificate in terms of Section 43 of the MPRDA, and therefore an application as contemplated in Regulation 57 is required in order for the DMRE to consider closure of the prospecting site. This information has been included in this report.

In addition, the regulations define the following terms:

- Residual environmental impact – means the environmental impact remaining after a closure certificate has been issued.
- Latent environmental impact – means any environmental impact that may result from natural events or disasters after a closure certificate has been issued.

7.1.2 Guidelines, Policies, Plans and Frameworks

The guidelines, policies and plans listed in Table 7-3 have been taken into account during the closure process, where applicable.

TABLE 7-3: GUIDELINE AND POLICY FRAMEWORK

Guideline	Governing body	Relevance
Public participation guideline in terms of NEMA (2017)	Department of Environmental Affairs	The purpose of this guideline is to ensure that an adequate public participation process is undertaken during the closure process.
Guideline on need and desirability (2017)		This guideline informs the consideration of the need and desirability aspects of the proposed project.
Planning for Integrated Mine Closure: toolkit; International Council on Mining and Metals.	International Council on Mining and Metals	This toolkit aims to assist in making decisions based on consideration of closure aspects in a holistic manner.
Rustenburg Local Municipality Integrated Development Plan 2018-2019	Rustenburg Local Municipality	The Rustenburg Local Municipality Integrated Development Plan is the principle strategic instrument guiding all planning, management, investment and development within the province in order to provide best solutions towards sustainable development.

Guideline	Governing body	Relevance
Bojanala Platinum District Municipality Integrated Development Plan 2017-2022	Bojanala Platinum District Municipality	The Bojanala Platinum District Municipality Integrated Development Plan is the principle strategic instrument guiding all planning, management, investment and development within the province in order to provide best solutions towards sustainable development.

7.2 LEGISLATIVE CLOSURE REPORT CONTENT REQUIREMENTS

This document has been prepared in accordance with the closure plan requirements of Regulation 62 of the MPRDA Regulations. Table 7-4 provides a summary of the requirements, with cross references to the report sections where these requirements have been addressed.

TABLE 7-4: CONTENTS OF THE CLOSURE PLAN

MPRDA Closure Report Requirements as per Section 62 of MPRDA Regulations	Reference in the Closure Plan
A description of the closure objectives and how these relate to the prospecting or mine operation and its environmental and social setting	Section 5
A plan contemplated in regulation 2(2), showing the land or area under closure	Section 6 Figure 4
A summary of the regulatory requirements and conditions for closure negotiated and documented in the environmental management programme or environmental management plan, as the case may be	Section 7
A summary of the results of the environmental risk report and details of identified residual and latent impacts	Section 8
A summary of the results of progressive rehabilitation undertaken	Section 9
A description of the methods to decommission each prospecting or mining component and the mitigation or management strategy proposed to avoid, minimize and manage residual or latent impacts	Section 10
Details of any long-term management and maintenance expected	Section 11
Details of a proposed closure cost and financial provision for monitoring, maintenance and post closure management	Section 12
A sketch plan drawn on an appropriate scale describing the final and future land use proposal and arrangements for the site	Section 13 Figure 4
A record of interested and affected persons consulted	Section 15
Technical appendices, if any	Section 16

8 ENVIRONMENTAL RISK ASSESSMENT AND IDENTIFIED RESIDUAL AND LATENT IMPACTS








8.1 BASELINE ENVIRONMENT AFFECTED BY THE PROPOSED ACTIVITY

Environmental attributes associated with the prospecting right area are presented in this section.

As part of verifying baseline conditions within the site, SLR undertook a site visit of the prospecting right area in January 2020. In addition, where relevant, information from available reports (see reference list included in Section 19) has been used.

A sample of photographs of the drill sites is presented in Figure 5.

FIGURE 5: SAMPLE PHOTOGRAPHS OF DECOMMISSIONED DRILL SITES FOR IMBASA

<p>Drill Site ID: BH7787 Drilling Period: Pre- 2010 Drilling Completed: 2010/03/06</p>	 <p>Photo taken pre-2010 Note: Recently decommissioned drill site</p>	 <p>Photo taken 2015 Note: Fully re-vegetated</p>
<p>Drill Site ID: BH8093 Drilling Period: 2011 Drilling Completed: 2011/11/01</p>	 <p>Photo taken 2014 Note: Re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated</p>
<p>Drill Site ID: BH8115 Drilling Period: 2012 Drilling Completed: 2012/06/26</p>	 <p>Photo taken in 2012 Note: Partially re-vegetated</p>	 <p>Photo taken in 2015 Note: Fully re-vegetated</p>
<p>Drill Site ID: BH 7791 Drilling Period: 2013 Drilling Completed: 2013/11/23</p>	 <p>Photo taken 2014 Note: Partially re-vegetated</p>	 <p>Photo taken 2020 Note: Fully re-vegetated, the drill hole cap missing at the time of assessment</p>

8.1.1 Geology

The prospecting right area is underlain by gabbro-norites and anorthosites belonging to the Pyramid Gabbro-norite unit of the Main Zone of the Bushveld Igneous Complex (BIC). The BIC consists of two lithologically distinct units that are mainly intrusive into the Transvaal Supergroup: a lower sequence of layered mafic and ultramafic rocks, known as the Rustenburg Layered Suite (RLS), and an overlying unit of granites, known as the Lebowa Granite Suite. All the chromitite and platinum mineralisation is located in the RLS (Madibeng Local Municipality SDF, 2015). The prospecting right area is composed of two distinct chromitite seams separated by a narrow pyroxenite parting of no more than a few centimetres. The lower chromitite correlates with what is regionally referred to as the UG2 Reef while the upper unit is the equivalent of the UG2 Leader - the two units together are conveniently referred to as the UG2 Zone. During prospecting, Imbasa targeted the Merensky and UG2 reefs in order to evaluate the potential for future exploitation of Platinum Group Metals (SLR, 2012).

Given the non-invasive nature of exploration drilling (when compared to mining), the geology baseline is expected to be in its pre-project state.

8.1.2 Topography

The prospecting right area is characterised by gentle undulating plains and flat terrain to the west with prominent hills to the east. Semi-mountainous and rugged areas dominate the eastern portion of the prospecting right area, with the local relief varying from about 1100 to 1255 metres above mean sea level (mamsl) (SLR, 2012). Drainage in the prospecting right area is towards the north flowing Kareespruit via minor non-perennial streams that only flow during times of higher rainfall. The topography of the prospecting right area has been influenced by granite quarrying and anthropogenic development

8.1.3 Climate

The climate of the area is semi-arid and experiences typical savannah climatic conditions namely hot and wet summers and cold and dry winters (SLR, 2012). Rainfall recorded in 2013 at the nearby Kareepoort station was approximately 622 mm per annum and temperatures are in excess of 40°C during Summer months. The winters are dry, with mild temperatures and only occasional frost.

Rainfall and temperature affect the rate at which vegetation can recover thus contributes to effective re-establishment of vegetation at the drill sites.

8.1.4 Soils and Land capability

Soils types characteristic of the prospecting right area consist of heavy-textured and strongly structured black soils, with a shrink-swell nature and are commonly referred to as "black turf". The topsoil depth is approximately 700 mm (SLR, 2012). The soil types characteristic of the prospecting right area consists of strongly structured black soils known as Calcic Vertisols and Umbric Leptosols. Calcic Vertisols have a very high clay content and are suitable for agriculture provided that there is plenty of rainfall or irrigation water. Umbric Leptosols occur on siliceous parent rock within the koppies in the prospecting area.

There is no material difference between the topsoil and subsoil layers. The shrink-swell nature of the soils means that within a short time, natural mixing of horizons will take place. In profile the soils have a relatively homogenous texture and structure from the surface downwards. It is expected that these soils would support the re-establishment of vegetation once surface disturbance ceases.

8.1.5 Biodiversity

The prospecting right area falls within the Savanna Biome as classified by Mucina & Rutherford (2006). The biome consists of the Marikana Thornveld and the Norite Koppies Bushveld vegetation types. The Marikana Thornveld is comprised of more open Acacia karroo woodland and occurs in valleys, undulating plains and lowland hills within the prospecting right area. The Norite Koppies Bushveld consists of rocky hills. Approximately 20% of the koppies within

this vegetation type are transformed due to urbanisation of surrounding land as well as mining activities (Mucina & Rutherford 2006). This was observed during the January 2020 site visit where it was noted that third party granite mining has adversely affected biodiversity within the prospecting right area. Additionally, the natural biodiversity within the prospecting right area has also been transformed by cultivation and livestock grazing.)

There are various critical biodiversity areas and ecological support areas that fall within the prospecting right area (Figure 6). However, as discussed above, some of the areas classified as critical biodiversity areas and ecological support areas are already cultivated or their biodiversity has been significantly altered due to granite mining.

Given that a considerable amount of the prospecting right area has already been disturbed by agricultural activities as well as granite mining, it is unlikely that the prospecting activities have caused any additional threat to the biodiversity.

8.1.6 Surface water

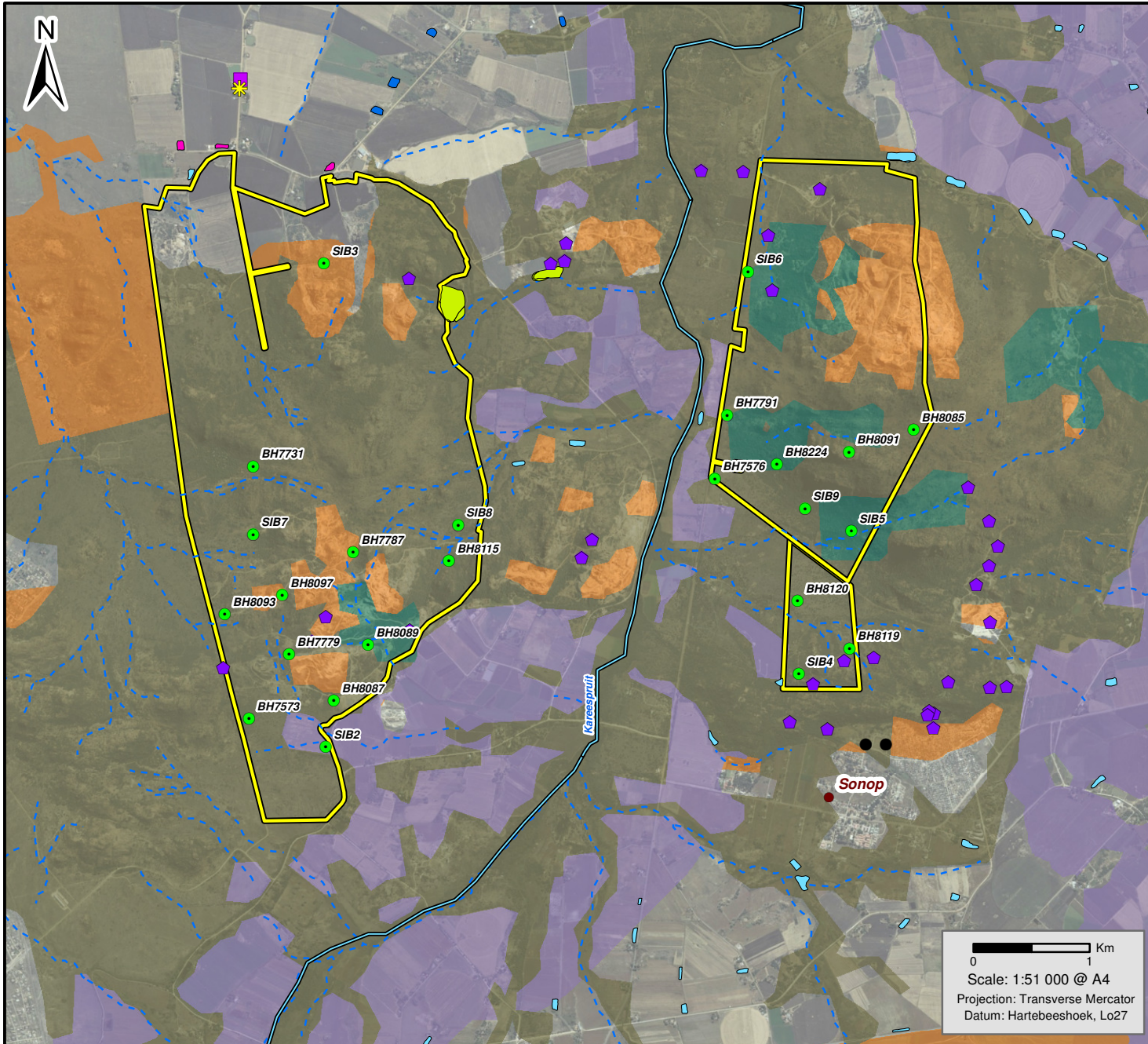
The prospecting right area is located within the upper reaches of the A21J quaternary catchment of the Crocodile West and Inkomati-Usuthu water management area. Quaternary catchment A21J has a catchment area of 1 151 km² and a Mean Annual Rainfall (MAR) of 22.65 million m³. The prospecting right area is mostly dominated by non-perennial tributaries of the Kareespruit. The perennial Kareespruit, which is moderately modified (NFEPA, 2011), flows through the centre of the prospecting right area. The Kareespruit River flows to the north whereupon it joins the Crocodile River. Water from the Kareespruit is used for domestic and agricultural purposes.

According to South African National Biodiversity Institute (2013), there are a few Central Bushveld Unchanneled valley-bottom wetlands that occur within the prospecting right area and are classified as the Central Bushveld Group 2 wetland vegetation type and are "Vulnerable" in terms of their conservation status. These are valley bottom wetlands without a river running through them and are formed when a river channel loses confinement and spreads out over a wide area.

Given the non-perennial nature of watercourses, the surface water quality and flow are not expected to have been altered by prospecting activities would have an impact on the surface water flow and quality.

8.1.7 Groundwater

The prospecting right area is underlain by two aquifers, namely a shallow weathered aquifer and a deep non-weathered aquifer. Below the black turf layer, a weathered zone extends down to an average of 10m to 15m below the surface. This weathered zone hosts a shallow, weathered aquifer that consists of residual norite. Based on previous studies the depth of this aquifer generally varies between 0 – 30 m below surface. The recharge to this aquifer is estimated to be in the order of 3% of the annual rainfall. The borehole yields in this aquifer are generally low due to the very low aquifer parameters of the aquifer material. The groundwater quality in undisturbed areas is good due to the dynamic recharge from rainfall (SLR, 2013). Third party water users rely on groundwater for domestic use, irrigation or livestock watering. Given the non-invasive nature of exploration drilling, the groundwater baseline is expected to have been unaltered by prospecting activities.



Legend

- Villages / Towns
- ▭ Imbasa Greater Prospecting Right Area
- Drill Sites
- Graveyards
- Historical House
- Late Iron Age Sites
- ☀ Tobacco Shed
- North West CBA and ESA (2015)
- Critical Biodiversity Area 1
- Critical Biodiversity Area 2
- Ecological Support Area 1
- Ecological Support Area 2
- NFEPA Wetlands
- Channelled valley-bottom wetland
- Unchannelled valley-bottom wetland
- Valleyhead seep
- Flat
- NFEPA Rivers
- CLASS C: Moderately Modified

Imbasa Platinum (Pty) Ltd

Figure 6

Sensitivity

0 1 Km
 Scale: 1:51 000 @ A4
 Projection: Transverse Mercator
 Datum: Hartebeeshoek, Lo27

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8.1.8 Air Quality

The following sources of emissions were identified in the surrounding area:

- **Fugitive dust:** This includes fugitive dust from paved and unpaved roads, agricultural activities (land preparation and harvesting) and wind erosion from open areas which generates fugitive dust and PM₁₀;
- **Granite quarries and other mining operations in the area:** These activities include materials handling (i.e. conveyor transfer points, off-loading and loading), land clearing operations, wind erosion from open areas (stockpiles, waste rocks and tailings storage facility), and blasting. These activities may result in emissions such as PM₁₀ (i.e. particulates with an aerodynamic diameter of less than 10µm), PM_{2.5} (i.e. particulates with an aerodynamic diameter of less than 2.5 µm), as well as nuisance dust;
- **Stack emissions:** stack emission include the release of sulphur dioxide (SO₂) and heavy metals from surrounding nearby mining operations;
- **Biomass burning:** biomass burning emissions include with carbon monoxide (CO), methane (CH₄) and nitrogen dioxide (NO₂) gases;
- **Household fuel combustion:** It is likely that households within the local communities utilise coal or wood for cooking and space heating (during winter) purposes. Emissions from domestic burning include PM₁₀, carbon dioxide (CO₂), sulphur dioxide (SO₂) and carbon monoxide (CO); and
- **Vehicle tailpipe emissions:** Significant primary pollutants include carbon dioxide (CO₂), carbon (C), sulphur dioxide (SO₂), oxides of nitrogen (mainly NO), particulates and lead. Secondary pollutants include NO₂, photochemical oxidants such as ozone, sulphur acid, sulphates, nitric acid, and nitrate aerosols (particulate matter).

Given the extent to which vegetation has re-established at drill sites, it is not expected that dust generated from exposed soils would influence the air quality baseline.

8.1.9 Noise

The ambient noise environment is typical of a rural area with livestock, birds, human activity as well as granite quarrying being the main sources of sound in the prospecting right area. Given the temporary nature of exploration drilling and that no prospecting activities are currently taking place or planned to take place, the noise baseline has remained unchanged.

8.1.10 Visual Aspects

Drilled holes are demarcated by a cement beacon and an upright standpipe and are not visible from nearby communities, although this is not expected to materially alter the visual landscape which has already been influenced by the development of the surrounding area, its support infrastructure (powerlines, roads etc.), farming activities and granite mining.

8.1.11 Heritage/Cultural and Paleontological Resources

There are several heritage resources identified within the prospecting right area, these include Late Iron Age sites, as well as two graveyards (namely GY01 and GY02) (refer to Figure 6). The graveyards occur in Sonop village. The identified sites and the graveyards were not affected by prospecting activities.

8.1.12 Socio-economic and Current Land Uses

Landownership

Land ownership details within and immediately adjacent to the prospecting right area are provided in the table below. The surface rights are mainly owned by the South African government, the Republic of Bophuthatswana, companies, communal property associations, trusts and private individuals. Figure 5 provides a delineation of the farm boundaries for the farms listed in the table below.

TABLE 8-1: LANDOWNERSHIP WITHIN AND IMMEDIATELY ADJACENT TO THE IMBASA PROSPECTING RIGHT AREA

Portion	Landowner
Hartebeestpoort B 410 JQ (Imbasa prospecting right area)	
Remaining Extent	National Government of The Republic of South Africa
Various farm portions	Private landowners- 23 listed individuals
Various farm portions	Companies- 12 listed companies/close corporations
Various farm portions	Trusts- 6 listed trusts
Various farm portions	Communal property- 2 listed associations
Hartebeestpoort B 410 JQ (Adjacent, surrounds the Imbasa prospecting right area)	
Remaining Extent	Republic of South Africa
Various farm portions	Private landowners- 16 listed individuals
Various farm portions	Companies- 12 listed companies/close corporations
Various farm portions	Trusts- 1 listed trust
Various farm portions	Communal property- 2 listed associations
Various farm portions	Churches- 2 Listed church
Uitvalgrond 416 JQ (Adjacent, to the south of the Imbasa prospecting right area)	
Various farm portions	Private landowners- 6 listed individuals
Portion 8	Trusts- 1 listed trust
Roodekopjes 417 JQ (Adjacent, to the east of the Imbasa prospecting right area)	
Various farm portions	Private landowners- 2 listed individuals
Portion 235	Trusts- 1 listed trust
Portion 262	Companies- 1 listed close corporations
Kareepoort 407 JQ (Adjacent, to the south of the Imbasa prospecting right area)	
Portion 1	Republic of Bophuthatswana
Portion 6	Republic of South Africa
Portion 3	Companies- 1 listed close corporations

Land Claims

The Department of Rural Development and Land Reform (DRDLR) (Land Claims Commissioner) was contacted on 10th January 2020 and has confirmed that there is an existing land claim lodged in 1998 on various farm portions within the prospecting right area. SLR is awaiting further details of who the land claimant is in order for them to be engaged as part of the public participation process.

Land uses

Figure 4 provides a visual representation of land uses both within the prospecting right area and at the drill sites themselves. Land use in the prospecting right area (i.e. pre-project land uses) comprises natural bushveld, cultivation, grazing, degraded grassland (disturbed by agricultural activities), granite mining, isolated farmsteads and service infrastructure such as tarred and gravel roads (public/private roads) as well as a powerline that traverses the prospecting right area in a north westerly/south easterly direction. There are no communities located within the prospecting right area.

The land use at the actual drill sites themselves is a mixture of natural bushveld, granite quarrying, isolated farmsteads and agricultural activities (previously cultivated fields, currently cultivated fields as well as livestock grazing) (refer to Table 8-2 below). These current land uses are similar to the land uses within the broader prospecting right area and these in turn are aligned with pre-prospecting land uses.

TABLE 8-2: CURRENT LANDUSES AT THE DRILL SITES

Land use	Drill Site
Granite Quarrying	BH7779
	BH8087
	BH8097
	BH7787
	BH8089
Agricultural (Cultivated Fields)	SIB2
Natural Vegetation	BH7573
	BH8093
	BH8115
	SIB8
	SIB7
	BH7731
	SIB3
	SIB6
	BH7791
	BH7576
	BH8224
	BH8091
	BH8085
	SIB9
	SIB5
	BH8120
BH8119	

Socio-economically, educational levels in the broader area are relatively low with a high level of unemployment. The high economic dependency on subsistence scale agriculture and granite quarrying has resulted in loss of biodiversity and overgrazing. This has likely influenced the rate at which vegetation has re-established at the drill sites and the current status of the rehabilitated areas.

8.1.13 Description of specific environmental features and infrastructure on the site

The environmental features and infrastructure in the broader prospecting right area is described above. In summary:

- The area comprises open veld with several koppies;
- The Kareespruit River flows in a northerly direction, adjacent to the prospecting right area;

- Existing service infrastructure including tarred and gravel roads (public/private roads);
- A powerline traverses the prospecting right area in a north westerly/ south easterly direction; and;
- The landscape has been influenced by granite quarrying activities, cultivated lands and livestock grazing.

8.1.14 Environment and current land use map

A conceptual map showing land uses on and immediately surrounding the prospecting site is provided in Figure 4

8.2 ENVIRONMENTAL IMPACTS AND RISKS

8.2.1 Risk assessment Summary

The potential impacts/risks have been assessed against the Imbasa prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. Given that decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed, this assessment focusses on potential residual impacts/risks as a result of the rehabilitation phase only. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr, therefore the assessment of the mitigated scenario is where additional mitigation measures are deemed necessary. The table below provides a summary of the potential impacts in no particular order of importance. A detailed description of the risk assessment is contained in Section 8.2.5.

Aspect	Potential impact	Reference to mitigation measures	Significance (takes into account measures implemented as per approved EMPr)	
			Unmitigated	Mitigated
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable
Visual	Change in the visual landscape of the area	No additional mitigation or monitoring is deemed necessary.	Insignificant	Not Applicable
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation or monitoring is deemed necessary.	Very Low	Not Applicable

8.2.2 Assessment Criteria

Both the criteria used to assess the impacts/risks and the method of determining the significance of the impacts/risks is outlined in Appendix D.

8.2.3 Description of the process undertaken to identify impacts

Biophysical and socio-economic impacts associated with the proposed project were identified through a site visit undertaken by SLR.

As part of the public participation process, I&APs and commenting authorities (see Section 15) are being provided with opportunities to provide input into the Closure process and comment on the proposed project, including the identification of environmental and socio-economic impacts.

8.2.4 Final Prospecting EMPr Performance Assessment

A final EMPr performance assessment was undertaken by SLR to inform the closure of the prospecting right

A site visit was conducted on 20th January 2020. The site visit included a visit to accessible drill sites as well as a general visit to the broader prospecting right area. Photographs were taken at drill sites and are presented in Figure 5. This final environmental audit was informed by the following:

- Previous Prospecting EMPr Performance Assessments;
- Previous Imbasa prospecting reports;
- Review of available photographs (2010, 2012, 2014, 2016 and 2020) of the drill sites;
- Review of available google earth imageries and climatic data for the drill sites over a specific period; and
- Observations from walking/driving through the prospecting right area.

Based on the above, the following findings are noted for the final EMPr performance assessment:

- There are currently no drilling activities taking place on site. 24 drill sites were completed during the prospecting period. The last drill site was completed in March 2014;
- During the January 2020 site visit, no clear distinction could be made between drill sites and the prospecting right area;
- There was evidence of grazing and the presence of invasive species at the drill sites, although this was not unique to the drill sites and was observed across the prospecting right area;
- A short summary of the status of each drill site is provided below. The location of the drill sites is shown on Figure 3 and photographs of drill sites is provided in Figure 5.
 - Drill sites BH7573 (completed in 2007): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill site BH8093 (completed in 2011): The vegetation has re-established to a satisfactory level. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved as the pre-prospecting land use has been achieved;
 - Drill site BH7791 (completed in 2014): The vegetation has re-established to a satisfactory level however; the drill hole was missing at the time of assessment. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - Drill site BH7787 (completed in 2010): The vegetation has re-established to a satisfactory level in 2015. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - BH8115 (completed in 2012): The vegetation was re-established to a satisfactory level in 2015. Therefore, no additional monitoring is deemed necessary as the pre-prospecting land use has been achieved;
 - A site verification undertaken at 3 drill sites¹ within the prospecting right area in January 2020, concluded that the vegetation had re-established to a satisfactory level. There was a proliferation of alien invasive species at some drill sites, however, this was not unique to the drill sites, and was also observed throughout the prospecting right area.
 - It was not possible to verify the status of vegetation within the remaining 21 drill sites² at the time of the assessment. This was mainly due to difficulties in locating standpipes within the drill sites (these had been either stolen or destroyed as they conflict with current land uses such as crop cultivation, granite mining etc.). In some instances, drill sites could not be accessed as access tracks have successfully re-vegetated and are therefore already fully rehabilitated);
 - According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore

¹ Drill Sites BH8093, BH7791 and BH7573

² Drill Site BH7576, BH7731, BH7779, BH7787, BH8085, BH8087, BH8089, BH8091, BH8093, BH8097, BH8119, BH8120, BH8224, SIB2, SIB3, SIB4, SIB5, SIB6, SIB7, SIB8 and SIB9 (drilled between 2004 and 2014).

assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at these drill sites, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application; and

- In summary:
 - Drill sites where additional management and monitoring is required: 0; and
 - Drill sites where vegetation has re-established to a satisfactory level: 24 (BH7573, BH7576, BH7731, BH7779, BH7787, BH7791, BH8085, BH8087, BH8089, BH8091, BH8093, BH8097, BH8115, BH8119, BH8120, BH8224, SIB2, SIB3, SIB4, SIB5, SIB6, SIB7, SIB8, SIB9).

The detailed assessment procedure is described in detail in Appendix E.

8.2.5 Detailed assessment of potential impacts

Decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed (as outlined in Section 10.1). This assessment therefore focusses on potential residual impacts/risks as a result of the rehabilitation phase only. Potential environmental and socio-economic residual impacts/risks have been identified by SLR. The sequence in which these issues are listed are in no order of priority or importance. The criteria used to rate each impact is outlined in. The criteria used to rate each impact is outlined in Appendix D.

The potential impacts/risks have been assessed against the Imbasa prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. It should be noted that there are there are third party land uses such granite quarrying at the drill sites as well as within the broader prospecting right area (Section 8.1.12). The environmental impacts of this land use remain the responsibility of the quarry operators and landowner. Therefore, these impacts have not been taken into account as part of the assessment.

A summary of the impact assessment is provided in 8.2.1. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr. The mitigated scenario is where additional mitigation measures are deemed necessary.

Issue: Loss of flora and fauna through lack of or poor rehabilitation

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of flora and fauna at the drill sites. This could cause a proliferation of alien invasive species and have edging effects on surrounding areas.

Assessment of impact

The prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). Rehabilitation activities have been undertaken at all drill sites, the sites have been cleared of waste and contaminated soils and the soils were prepared for re-vegetation. Vegetation and related habitat and faunal species at the drill sites have been influenced to varying degrees by livestock grazing and cultivation by third party land uses which are similar to land uses prior to prospecting activities.

According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at these drill sites, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application. These land uses are aligned with pre-prospecting land uses.

A site verification undertaken at 3 drill sites within the prospecting right area in January 2020, concluded that the vegetation had re-established to a satisfactory level. There was a proliferation of alien invasive species at some drill sites, however, this was not unique to the drill sites, and was also observed throughout the prospecting right area. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification. During the 2020 site visit, it was not possible to verify the status of re-vegetation at 21 of the drill sites. This was mainly due to difficulties in locating standpipes within the drill sites (these had been either stolen or destroyed as they conflict with current land uses such as crop cultivation, granite mining etc.). In some instances, drill sites could not be accessed as access tracks have successfully re-vegetated and are therefore already fully rehabilitated.

Therefore, the loss of flora and fauna through a lack of or poor rehabilitation is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE: IMPACT/RISK SUMMARY – FLORA AND FAUNA

Issue: Loss of flora and fauna through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-
Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing livestock grazing and cultivation within the prospecting right area would contribute to cumulative impacts on the flora and fauna.	
Degree to which impact can be reversed	Over time, with controlled livestock grazing and cultivation any potential impacts could be reversed.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

Issue: loss of pre-prospecting land uses through lack of or poor rehabilitation

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of pre-prospecting land uses. This could affect the livelihoods of communities who rely on the land for subsistence purposes. In addition, this could result in on-going dust emissions from exposed areas which could cause a nuisance to surrounding land uses.

Assessment of impact

The current post-prospecting land uses within the prospecting right area include natural bushveld, livestock grazing, granite quarrying and cultivation. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site). Rehabilitation activities have been undertaken at all drill sites, the sites have been cleared of waste and contaminated soils and the soils were prepared for re-vegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification of the site as a prospecting drill site.

The pre-prospecting land uses within the prospecting right area were a mixture of natural bushveld, cultivation, degraded grassland as well as granite quarrying (which was scattered throughout the prospecting right area). Similar land uses post-prospecting still occur at the drill sites and within the broader prospecting right area, however, the extent and intensity of these land uses may have increased in recent years subsequent to the completion of exploration drilling. The environmental impacts and liabilities for these land uses remains the responsibility of quarry operators and landowners/land users. Therefore, this assessment focuses only on the impacts associated with loss of pre-prospecting land uses as a result of prospecting.

According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at these drill sites, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application. At the time of the 2020 site visit there was also the proliferation of alien invasive species on some of the drill sites, however, this was seen throughout the broader area.

As the drill sites have re-vegetated successfully, the pre-prospecting land uses on and surrounding the drill sites can continue. Therefore, the loss of pre-prospecting land uses through a lack of or poor rehabilitation is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE: IMPACT/RISK SUMMARY – LAND USE

Issue: Loss of pre-prospecting land use through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-
Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing livestock grazing, and cultivations within the drill site areas would contribute to cumulative impacts on land uses.	
Degree to which impact can be reversed	Over time, with controlled livestock grazing and cultivation, pre-mining land uses could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

Issue: Change in the visual landscape of the area

Description of impact

A lack of or poor rehabilitation could alter the natural visual landscape and result in scarring.

Assessment of impact

The landscape is semi-urban in nature and dominated by livestock grazing and cultivation. Rehabilitation activities have been undertaken at all drill sites, the sites were cleared of any waste or contaminated soils and the soils prepared for re-vegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drill hole. This is to allow for easy identification of the site as a prospecting drill site.

According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. With the re-vegetation of the drill sites, the visual landscape would return to a pre-prospecting state.

During a drive through the prospecting right area in January 2020, prospecting drill sites were not obvious in the landscape and no visible scarring was noted. Therefore, the change in the landscape is considered to be **INSIGNIFICANT** even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE: IMPACT/RISK SUMMARY – VISUAL LANDSCAPE

Issue: Change in the visual landscape of the prospecting right area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	-
Duration	Very short term (VL)	-
Extent	A part of the site (VL)	-
Consequence	Very Low	-
Probability	Unlikely (VL)	-
Significance	Insignificant	-
Nature of cumulative impacts	Ongoing livestock grazing, and cultivation within the drill site areas would contribute to have cumulative impacts on landscape.	
Degree to which impact can be reversed	With adequate controlled livestock grazing and cultivation, the pre-prospecting landscape could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Not required.	
Residual impacts	None expected.	

Issue: Negative and positive socio-economic impacts

Description of impact

Closure of the Imbasa prospecting right has the potential to result in both negative and positive socio-economic impacts.

Assessment of impact

The closure of the Imbasa prospecting right would prevent Imbasa from undertaking any further prospecting activities. As the nature of prospecting activities is to determine the presence of exploitable mineral resources and is not associated with generating a revenue, social related benefits are thus not applicable. With Imbasa abandoning and exiting from the prospecting project, the mineral resource becomes available for third party applications. Given that the prospecting activities ceased in 2014, the loss of income for contractors which would have resulted in loss of temporary employment opportunities for the communities is considered to be insignificant. This is mainly because, there has not been any income generated as contractors have not been on site for 5 years. Moreover, given the scope and scale of prospecting activities, it is expected that such loss in income would be limited.

When considering the potential negative socio-economic impacts together with the opportunity that is created for third party applicants the overall impact is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation or monitoring is deemed necessary.

TABLE: IMPACT/RISK SUMMARY – SOCIO-ECONOMIC

Issue: Negative and positive socio-economic impacts in the prospecting right area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (VL)	-
Duration	Short term (L)	-
Extent	Affecting immediate neighbours (M)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	No cumulative impacts expected.	
Degree to which impact can be reversed	With adequate communication structures negative impacts can be controlled and positive impacts can be enhanced.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Possible.	
Residual impacts	None expected.	

9 PROGRESSIVE REHABILITATION UNDERTAKEN

Progressive rehabilitation took place as prospecting activities advanced. Rehabilitation commenced as each drill site was completed and decommissioned. Rehabilitation activities were aligned with Imbasa's approved EMPr and closure objectives, and included the activities outlined in Section 10.1 below.

According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at these drill sites, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

A site verification undertaken at 3 drill sites³ within the prospecting right area in January 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It was not possible to verify the status of vegetation within the remaining 21 drill sites⁴ at the time of the assessment. This was mainly due to difficulties in locating standpipes within the drill sites (these had been either stolen or destroyed as they conflict with current land uses such as crop cultivation, granite mining etc.). In some instances, drill sites could not be accessed as access tracks have successfully re-vegetated and are therefore already fully rehabilitated.

The final environmental audit completed forms part of this submission. Further detail is included in the final environmental audit in Section 8.2.4.

³Drill Sites BH8093, BH7791 and BH7573

⁴Drill site BH7576, BH7731, BH7779, BH7787, BH8085, BH8087, BH8089, BH8091, BH8093, BH8097, BH8119, BH8120, BH8224, SIB2, SIB3, SIB4, SIB5, SIB6, SIB7, SIB8 and SIB9) (drilled between 2004 and 2014)

10 METHODS TO DECOMMISSION PROSPECTING COMPONENTS AND STRATEGIES TO AVOID, MINIMIZE AND MANAGE RESIDUAL OR LATENT IMPACTS

10.1 DECOMMISSIONING AND REHABILITATION OF DISTURBED AREAS

Decommissioning and rehabilitation took place immediately after exploration work at each drill site was completed in line with the approved EMPr. This usually took between one and three days. Decommissioning and rehabilitation activities at each site included the following steps:

- Removal of all equipment, structures and materials;
- Removal of any waste and disposal at an appropriately permitted waste site;
- Sealing and capping of all drill holes and installation of a 0.8 x 0.8 x 0.8 m concrete block and standpipe for easy identification;
- Replacing and levelling topsoil (where removed);
- Scarifying/ripping areas where soils have been compacted; and
- Areas were left to naturally re-vegetate.

These steps were based on the regulatory requirements for rehabilitation of the prospecting sites as detailed in the approved EMPr (see Text box below for an outline of the rehabilitation commitments). It should be noted that at the time of compiling the prospecting EMPr, the DMRE's standard EMPr format was relevant.

Rehabilitation commitments as detailed in the approved EMPr (dated 30 April 2004):

Rehabilitation of Access Roads

- Whenever a mining permit/ prospecting right is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit or right, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to his satisfaction;
- Imported road construction materials which may hamper regrowth of vegetation must be removed and disposed of in an approved manner prior to rehabilitation;
- If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Director: Mineral Development may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification; and
- Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre mining/ prospecting situation.

Office/Camp Sites

- On completion of operations, all buildings, structures or objects on the camp/office site shall be dealt with in accordance with section 40 of the Mineral Act, 1991;
- Where long-term camp and office sites have been denuded of vegetation/grass or where soils have been compacted due to traffic, the surface shall be scarified or ripped and if necessary fertilised to allow vegetation to establish rapidly. If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Director: Mineral Development may require that the soil be analysed and any deleterious effects on the soil arising from the prospecting operation, be corrected and the area be seeded with a seed mix to his specification; and
- Photographs of the camp and office sites shall be taken at selected points before and during prospecting and after rehabilitation and kept on record for the Director: Mineral Development's information.

Drilling Sites

- On completion of Prospecting, the drilling site shall be rehabilitated to the | satisfaction of the Director: Mineral Development. Pits shall be pumped dry and the contents disposed of as described in section 1.3.2. Linings must be removed and disposed of in the same manner;

- After all foreign matter has been removed from the pits, the excavations shall be 'backfilled with subsoil compacted and levelled with previously stored topsoil. No foreign matter such as cement or other rubble shall be introduced into such backfilling;
- All buildings, structures or other objects shall be dealt with in accordance with section 40 of the Minerals Act, 1991;
- French drains shall be compacted and covered with a final layer of topsoil to a height of 10cm above the Surrounding ground surface.
- All boreholes shall be covered and made safe by means of a concrete cap, unless otherwise determined by the Director: Mineral Development. At a borehole with a history of methane emissions, an extension pipe of at least 2 metres in length should be bolted onto the borehole standpipe by means of a flange to allow free emission and dissipation of methane. On cultivated land, where practicable, a concrete cap shall be installed at least 1 metre below the surface. Boreholes shall be backfilled and compacted with appropriate inert material and soil. No Foreign matter such as rubble or waste material shall be introduced into the hole;
- Where drilling Sites (long-term operation) have been denuded of vegetation/grass or where soils have been compacted or transformed, the surface shall be ripped or ploughed and if necessary, appropriately fertilised to allow vegetation to grow rapidly. If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Director: Mineral Development may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification; and
- Photographs of the camp and office sites shall be taken at selected points before and during prospecting and after rehabilitation and kept on record for the Director: Mineral Development's information.

Exploration Trenches, Pits and Shafts

- On completion of "prospecting, excavations shall be rehabilitated to the satisfaction of the Director. Mineral Development;
- All foreign matter shall be removed from the site. Excavations shall be backfilled with subsoil compacted and levelled with previously stored topsoil. No foreign matter such as cement or other rubble shall be introduced into such backfilling;
- If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Director: Mineral Development may require that the soil be analysed and any deleterious effects on the soil arising from the prospecting operation, be corrected and the area be seeded with a seed mix to his specification;
- Compacted areas on prospecting sites that have been in operation for one year and longer shall be ripped and ploughed to ensure regrowth of vegetation;
- Colouring could mitigate the visual impact of newly exposed rock faces created by prospecting, with a non-toxic agent or by establishing suitable vegetation as a visual screen; and
- Photographs of the exploration trenches, pits and shafts shall be taken at selected points before and during prospecting and after rehabilitation and kept on record for the Director: Mineral Development's information.

Rock sampling on hills and mountains and general grid sampling of soils and rocks

- On completion of prospecting, the sampling site shall be rehabilitated to the satisfaction of the Director: Mineral Development;
- All foreign matter shall be removed from the Site. Excavations shall be backfilled with subsoil compacted and levelled with previously stored topsoil. No foreign matter such as concrete or other rubble shall be introduced into such backfilling;
- Colouring could mitigate the visual impact created by exposed rock faces, resulting from excavations, with a non-toxic agent or by establishment of suitable vegetation as a visual screen; and
- Photographs of the exploration trenches, pits and shafts shall be taken at selected points before and during prospecting and after rehabilitation and kept on record for the Director: Mineral Development's information.

10.2 STRATEGIES TO AVOID, MINIMIZE AND MANAGE RESIDUAL OR LATENT IMPACTS

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

11 LONG-TERM MANAGEMENT AND MAINTENANCE

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation or monitoring is required.

12 PROPOSED CLOSURE COST AND FINANCIAL PROVISION

12.1 QUANTUM OF THE FINANCIAL PROVISION

Based on the final environmental audit, the closure cost estimate below considers the following:

- There are currently no drilling activities taking place on site; and
- The vegetation within all drill sites has re-established to a satisfactory level and no further maintenance or aftercare activities are deemed necessary.

Given that Imbasa is applying to close the Imbasa prospecting right and no remaining drill holes will be drilled under the prospecting right, only the current closure liability has been included in this report.

The closure cost estimate provided in Figure 7 below. These estimates assume that re-vegetation at all drill sites has been successful and no further monitoring or rehabilitation is required. In this regard there is no allowance made for further maintenance and aftercare activities.

FIGURE 7: CLOSURE COST ESTIMATE

Inkosi Prospecting Operations					
Current Closure and Rehabilitation Costs					
Item	Description	Quantity	Unit	Rate	Amount
1	Sealing of boreholes	0,0000	No.	R 1 500,00	R 0,00
2	Demolish and remove concrete drilling platform	0,0000	No.	R 3 000,00	R 0,00
3	Removal of portable ablution facilities	0,0000	No.	R 1 000,00	R 0,00
4	Demolish and backfill sumps	0,0000	No.	R 1 500,00	R 0,00
Item	Description	Quantity	Unit	Rate *	Amount
5	General surface rehabilitation of current drilled sites (not applicable)	0,0000	ha	R 133 000,00	R 0,00
6	General surface rehabilitation of recently rehabilitated sites	0,0000	ha	R 133 000,00	R 0,00
7	General surface rehabilitation of previously rehabilitated sites (re-vegetation at all drill sites has been successful and no further monitoring or rehabilitation is required)	0,0000	ha	R 0,00	R 0,00
8	General surface rehabilitation (rip and vegetate) of rehabilitated access tracks (not applicable)	0,0000	ha	R 133 000,00	R 0,00
9	Demobilise and general surface rehabilitation (rip and vegetate) of camp sites (not applicable)	0,0000	ha	R 133 000,00	R 0,00
10	2 to 3 years of maintenance & aftercare of all areas (not applicable, the last drill hole was in 2014)	0,0000	ha	R 19 950,00	R 0,00
				SUB TOTAL 1	R 0,00
11	Preliminary and General	20,0000	%	of Sub Total 1	R 0,00
12	Contingencies	10,0000	%	of Sub Total 1	R 0,00
				SUB TOTAL 2	R 0,00
13	VAT	15,0000	%	of Sub Total 2	R 0,00
				GRAND TOTAL	R 0,00

*Rates have been taken from ""Guideline Document for the Evaluation of the Quantum of Closure-Related Financial Provision Provided by a Mine"" as published by the Department of Mineral Resources and Energy (DMRE), dated January 2005. The rates have been inflated by 128.45 % to account for escalation since January 2005.

Imbasa submitted a financial guarantee of R 60,000.00 (Guarantee number: G0657/578615/GLO; 9 December 2015) to the DMRE for the Imbasa prospecting right. The updated final financial provision is calculated at R 0.00. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 60,000.00 should be cancelled.

12.2 CONFIRMATION THAT THE FINANCIAL PROVISION WILL BE PROVIDED

An existing financial guarantee is in place. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 60,000.00 should be cancelled (see Section 12.1 above).

13 FINAL AND FUTURE LAND USE

A plan showing the area under closure including the final and future land use is presented in Figure 4.

14 ASSUMPTIONS, UNCERTAINTIES, LIMITATIONS AND GAPS IN KNOWLEDGE

This Closure Plan relies on SLR's professional opinion which has been informed by the following:

- Previous EMPr Performance Assessments;
- Previous Financial Provision reports;
- Prospecting reports;
- Review of historic and current google earth imagery;
- Review of climatic data for the post-drilling period;
- Photographs taken in 2012, 2014 and 2016 by SLR and Imbasa as part of EMPr performance assessments; and
- A Site visit undertaken by SLR in 2020.

It is assumed that progress of re-vegetation will continue to be influenced by rainfall patterns for the area.

The Risk Assessment focuses on third parties only and does not assess health and safety impacts on employees and contractors because the assumption is made that these aspects are separately regulated by health and safety legislation, policies and standards, and that Imbasa will adhere to these.

Although third party granite quarrying occurs within the prospecting right area, the environmental liability of this activity remains the responsibility of the quarry operators. Therefore, the impacts of quarrying have not been taken into account in this assessment.

This Risk Assessment relies on historic photographs, EMPr performance assessments as well as a site visit undertaken to some drill sites to draw conclusions on the status of rehabilitation within the prospecting right area.

15 CONSULTATION RECORD

15.1 DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED

This section describes the public participation process undertaken for the Closure Plan.

15.2 PUBLIC PARTICIPATION PROCESS UNDERTAKEN TO DATE

A public participation process is being undertaken to inform the Closure Plan in accordance with the consultation requirements under the MPRDA. A record of the public participation process undertaken is outlined in Table 15-1 below. The purpose of the public participation process was to notify landowners, land users and other key stakeholders of the proposed project and to provide them with opportunity to raise any initial issues or concerns regarding the proposed project.

It should be noted that this public participation process (i.e. stakeholder meetings) covered two separate prospecting right closure projects. Given that these two prospecting rights were immediately adjacent to one another and required engagement with same I&APS, it was considered appropriate that one public participation process was followed.

A record of the public participation process undertaken is outlined in Table 15-1 below and supporting documentation is presented in Appendix C.

TABLE 15-1: PUBLIC PARTICIPATION PROCESS UNDERTAKEN AS PART OF THE CLOSURE PLAN

Steps	Details
DMRE Pre-application meeting	A project-specific pre-application meeting has not been undertaken for this project. Reference has been made to a pre-application meeting held with the DMRE on the 10 th of May 2019 in support of a similar prospecting right closure application. In this regard, the same process has been adopted for the Imbasa prospecting right closure and is, therefore, applied to this application.
Focused Meetings	<p>Focused meetings were held with:</p> <ul style="list-style-type: none"> • The Madibeng Local Municipality Ward 40 Councillor on 22nd of January 2020; • The Rustenburg Local Municipality Ward 32 Councillor on 22nd of January 2020; and • The Gotsube le Thotwe Communal Property Association on 22nd of January 2020. <p>The purpose of the focussed meetings was:</p> <ul style="list-style-type: none"> • To provide information on the Imbasa prospecting right closure; • To provide an overview of each of the projects and related environmental assessment processes; • To provide an overview of the proposed closure applications; • To provide I&APs with an opportunity to: <ul style="list-style-type: none"> ○ Raise any issues and concerns (both positive or negative); and ○ Provide input on any environmental sensitivities and potential impacts. • To outline the way forward for the project. <p>Copies of the meeting minutes are included in Appendix C</p>
Notification of the land claims commissioner	The land claims commissioner was consulted in order to verify the status of land claims on the farm Hartebeestpoort. The proof of correspondence is included in Section 15.5 and Appendix C
I&AP database	A database was compiled with input from the Imbasa stakeholder engagement team and is being updated on an on-going basis for the duration of the project. The project database identified and included landowners, land users and lawful occupiers within the prospecting right area, as well as those immediately adjacent to the projecting right area. In addition, the project database included surrounding I&APs, and regulatory authorities. All stakeholders registered on the project database received a copy of the Background Information Document (BID), and SMS notification of the proposed project and are being notified that the Closure Plan Report is available for public and regulatory authority review and comment. Landowner, land user, commenting authorities and other I&AP details were verified through a deed search and/or telephonic discussions. A copy of the project database is included in Appendix C

Steps	Details
Background Information Document (BID)	<p>A BID (in English and Setswana) was compiled by SLR. The BID provided:</p> <ul style="list-style-type: none"> • Information about the proposed Imbasa prospecting right closure; • Information about the baseline environment of the prospecting right area; • Information about the environmental assessment process (Basic Assessment Process); • Information regarding possible environmental/cultural impacts; and • Information on how I&APs and commenting authorities can have input into the environmental assessment process. <p>The BID was distributed to commenting authorities and I&APs registered on the project database via email on the 30th of January 2020. In addition, the BID was also distributed by hand to the Sonop, Segwaelane and Makolokwe communities. A registration and response form was attached to the BID, which provided I&APs with an opportunity to register as an I&AP and submit comments on the proposed project. Copies of the BID in English and Setswana are included in Appendix C.</p>
Site notices	<p>Laminated site notices (in English and Setswana) were placed in the prospecting right area and other publicly accessible locations on 29th and 30th of January 2020. Farm portions 1113, 1112 and 1150 did not have perimeter fences, therefore, site notices could not be placed on these property boundaries. For these portions, laminated site notices were placed within the vicinity of the farm portions. Photographic proof is included in Appendix C</p>
Newspaper advertisements	<p>A block advertisement was placed in the Brits Pos on 30th January 2020. A copy of the advertisement is included in Appendix C</p>

15.3 REVIEW OF THE CLOSURE PLAN

The Closure Plan Report has been made available for commenting authority and I&AP review and comment for 30 days. A Summary of the Closure Plan (in English and Setswana) has been made available to all I&APs registered on the I&AP database. Hard copies of the report and summary documents have been made available at the Madibeng Ward 40 Councillor Offices, Bakwena Ba Mokgopa Tribal Office and Segwaelane Clinic. In addition, I&APs will be notified via SMS that the Closure Plan Report and/or summary is available for review. An electronic copy of the Closure Plan will be made available on the SLR website.

Commenting authorities will receive an electronic copy or a hard copy of the Closure Plan Report depending on the commenting authorities' preference.

15.4 COMPLETION OF THE CLOSURE PLAN

Following closure of the Closure Plan Report commenting period, all comments received will be incorporated and responded to in a Comments and Responses Report. Where required the Closure Plan will be updated to address comments received. The final report including I&AP comments will be submitted to DMRE for consideration and decision-making. Registered I&APs will receive notification of the final submission to the DMRE.

After the DMRE has reached a decision registered I&APs will be notified of the outcome of the application, the reasons for the decision and details of the appeal process.

15.5 SUMMARY OF COMMENTS RAISED BY I&APS

With the exception of a few general comments and questions requiring clarification, no issues were raised during the meeting. The questions/comments raised have been recorded in Table 15-2 below. All comments/questions received during the Closure Plan Report review period will continue to be collated and responded to in a Comments and Responses Report

TABLE 15-2: SUMMARY OF COMMENTS RAISED BY I&APS

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Ward Councillors				
Mr. Steve Maimane	22 January 2020	Where is Imbasa Platinum generally based?	Imbasa Platinum is not an existing mine. It is a company that has formed a partnership with Impala Platinum Holdings Limited (Implats) to undertake prospecting activities in the area. However, the Imbasa Board made the decision not to apply for a mining right and commence mining, as it was found that the project is not economically viable. The closure of the Imbasa prospecting right area allows for third party prospectors to apply for the prospecting right in the area (Implats).	Appendix C
Mr. Aubrey Molotsi	22 January 2020	Why are you doing public participation?	An environmental assessment process is required for Imbasa to comply with the legal requirements of closing the prospecting right. Public participation is a legally required part of this environmental assessment process which supports the closure application. (SLR)	Section 15
Mr. Steve Maimane	22 January 2020	Where is the project located? We would like to get an understanding of the project location to ensure that the information presented to the community is accurate.	The prospecting right area is located within the Madibeng Local Municipality, north of Sonop and east of Segwaelane area. The prospecting right area is directly adjacent to Ward 32 (under Councillor Mr. Aubrey Molotsi) of the Rustenburg Local Municipality. The presentation provided during the meeting included a locality map to help with understanding the location of the prospecting activities. (SLR)	Section 2
Mr. Aubrey Molotsi	22 January 2020	It is important to manage public participation in this area given the different stakeholders that exist.	The different stakeholders are being consulted as part of the public participation process. (SLR)	Section 15
Landowners				

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
Ms. Francinah Tlhapane	22 January 2020	It would be better in terms of public participation if a community meeting was held to present the project. This will allow for the illiterate and elderly people to participate in the process and understand what the project is about.	This request was taken into consideration, however given the scope and scale of the project together with the fact that the Basic Assessment Report and Closure Plan Report and translated summary documents are being made available for public review and comment, it was not deemed necessary to have meetings.	Section 15
South African Heritage Resources Agency				
Natasha Higgitt	30 January 2020	<p>Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.</p> <p>Please create an application on SAHRIS and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA.</p> <p>Once all documents including all appendices are uploaded to the case application, please ensure that the status of the case is changed from DRAFT to SUBMITTED. Please ensure that all documents produced as part of the EA process are submitted as part of the application and are submitted to SAHRA at the beginning of the Public Review periods. Once all these documents have been uploaded, I will be able to issue an informed</p>	An application was created on the SAHRIS portal with the following case ID: 14799.	Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
		comment as per section 38(4) and 38(8) of the NHRA		
Natasha Higgitt	21 February 2020	<p>Thank you for notifying SAHRA of the Environmental Authorisation (EA) and Closure of a Prospecting Right on Hartebeestpoort B 410 JQ, near Brits, in the North West Province (NW30/5/1/1/2/424 PR).</p> <p>As the proposed development is undergoing an EA Application process in terms of the National Environmental Management Act, 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, No 28 of 2002 (MPRDA)(As amended), it is incumbent on the developer to ensure that a Heritage Impact Assessment (HIA) is done as per section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). This must include an archaeological component and any other applicable heritage components. The HIA must be conducted as part of the EA Application in terms of NEMA and the NEMA EIA Regulations.</p> <p>The quickest process to follow for the archaeological component would be to contract a qualified archaeologist (see www.asapa.co.za or www.aphp.org.za to provide an Archaeological Impact Assessment (AIA). The AIA must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Component of Impact</p>	A Letter of Recommendation for Exemption has been provided by the heritage specialist Dr. Julius Pistorius.	Appendix G

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
		<p>Assessments. The Minimum Standards make reference to a Letter of Recommendation for Exemption from further studies that the appointed specialist may submit, should they feel that it is appropriate.</p> <p>No further assessment of palaeontological resources is required as the development footprint is located within an area of insignificant sensitivity as per the SAHRIS PalaeoSensitivity map.</p> <p>Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p> <p>The draft BAR with appendices must be submitted to the SAHRIS application at the beginning of the Public Review period so that informed comments may be issued. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>		
Commission on Restitution of Land Rights: North West				
Mr L.J Bogatsu	12 February 2020	We confirm that there is an existing land claim against the properties above, the claim was lodged under Madibeng Local Municipality within Bojanala District and the claim has been found to be valid and it is settled in phases. This reflects on	SLR is awaiting further details of who the land claimant is in order for them to be engaged as part of the public participation process for the closure of the Imbasa prospecting right.	Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR unless otherwise indicated in brackets	Section and paragraph reference in this report where the issues and or responses were incorporated
		the database for claims lodged by 31 December 1998.		
Interested and Affected Parties				
Lynette Denner	07 February 2020	With this e mail we want to submit our details as an interested and/or affected party. For projects: Imbasa PR closure and Imbasa Platinum (Pty) Ltd PR Closure.	This stakeholder has been registered as an I&AP on the project database and will received project related information.	Appendix C

16 TECHNICAL APPENDICES

There are no technical appendices; this section is therefore not applicable.

17 CONCLUSION AND RECOMMENDATIONS

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. Given that decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr.


It follows that no additional active mitigation or monitoring is required.

Based on the estimated rehabilitation and closure costs outlined in Section 12 the updated final financial provision is calculated at R 0.00. Where the DMRE agrees that the above is appropriate, the existing financial guarantee of R 60,000.00 would be cancelled.

18 UNDERTAKING

We, Reinett Mogotshi/Caitlin Hird the Environmental Assessment Practitioners responsible for compiling this report, undertake that:

- The information provided herein is correct;
- Comments and inputs from stakeholders and I&APs have been included and correctly recorded in this report;
- Inputs and recommendations from the specialist reports have been included where relevant; and
- Any information provided to I&APs and any responses to comments or inputs made is correct or was correct at that time.



Signature of EAP

12/03/2020

Date



Signature of EAP

12/03/2020

Date



Signature of commissioner of oath

12/03/2020

Date

Greg Brown CA (SA)

Commissioner of Oaths (RSA)

3rd Floor, Block E, The Pivot

Montecasino Blvd, Fourways

19 REFERENCES

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