

BASIC ASSESSMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN FOR THE CLOSURE OF THE IMBASA PROSPECTING RIGHT

Hartebeestpoort B 410 JQ

MARCH 2020

SUBMITTED FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998) IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002) (AS AMENDED)

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SLR 

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Report Status	For public and regulatory authority review

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BASIS OF REPORT

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BASIC ASSESSMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME AND 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 Department of Mineral Resources and Energy (DMRE) in terms of Section 43(4) of the MPRDA.
- 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 activities are included in Section 3.1.

STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced prior to the submission of the Basic Assessment Report (BAR) 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 BAR 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 this BAR. Further comments arising during the review of the BAR will be handled in a similar manner.

This BAR 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 BA 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 BAR and/or summary is available for review.

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

<p>SLR Consulting (Africa) (Pty) Ltd Attention: Reinett Mogotshi</p> <p>PO Box 1596, Cramerview 2060 (if using post please call SLR to notify us of your submission)</p> <p>Tel: (011) 467 0945 Fax: (011) 467 0978 E-mail: rmogotshi@slrconsulting.com</p>

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
BA	Basic Assessment
BAR	Basic Assessment Report
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

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.

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.

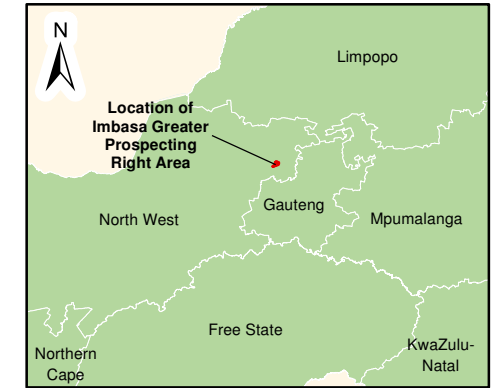
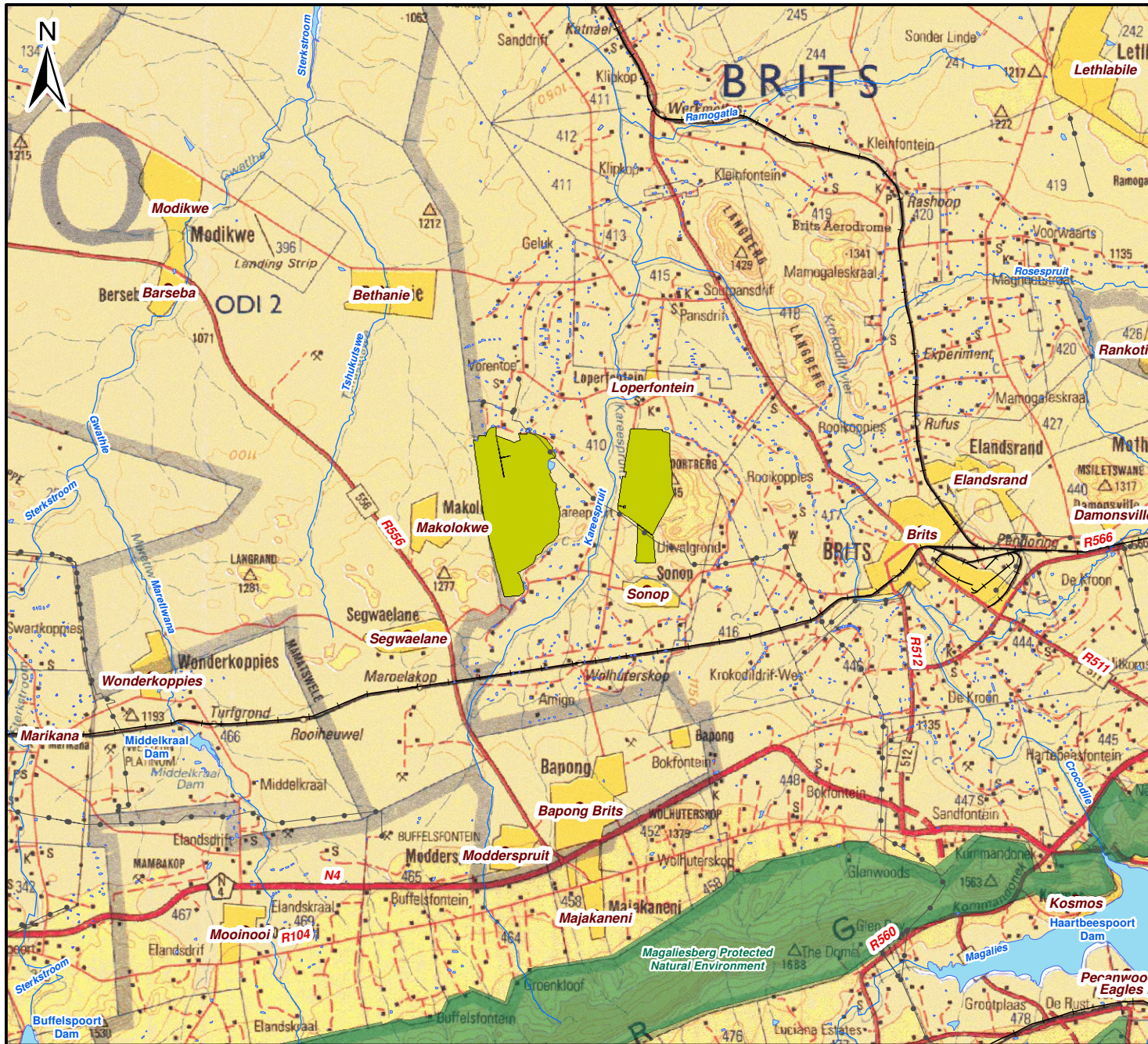
SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Imbasa Platinum (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Imbasa prospecting right.

PURPOSE OF THIS REPORT

This Basic Assessment Report (BAR) has been compiled and distributed for review and comment as part of a Basic Assessment (BA) process that is being undertaken for the closure of the Imbasa prospecting right, near Brits in the North West Province.

This BAR provides a description of the proposed closure project and the affected environment; summarises the BA process followed to date; presents to a closure plan for the project; identifies and assesses the key impacts associated with the decommissioning and closure of the Imbasa prospecting right and presents management and mitigation measures.

Interested and Affected Parties (I&APs) are being asked to comment on the BAR (see Section below). The document will then be updated into a final report, giving due consideration to the comments received. The BAR will be submitted to the Department of Mineral Resources and Energy (DMRE) for consideration as part of the application for Environmental Authorisation in terms of Chapter 5 of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA), as amended.



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

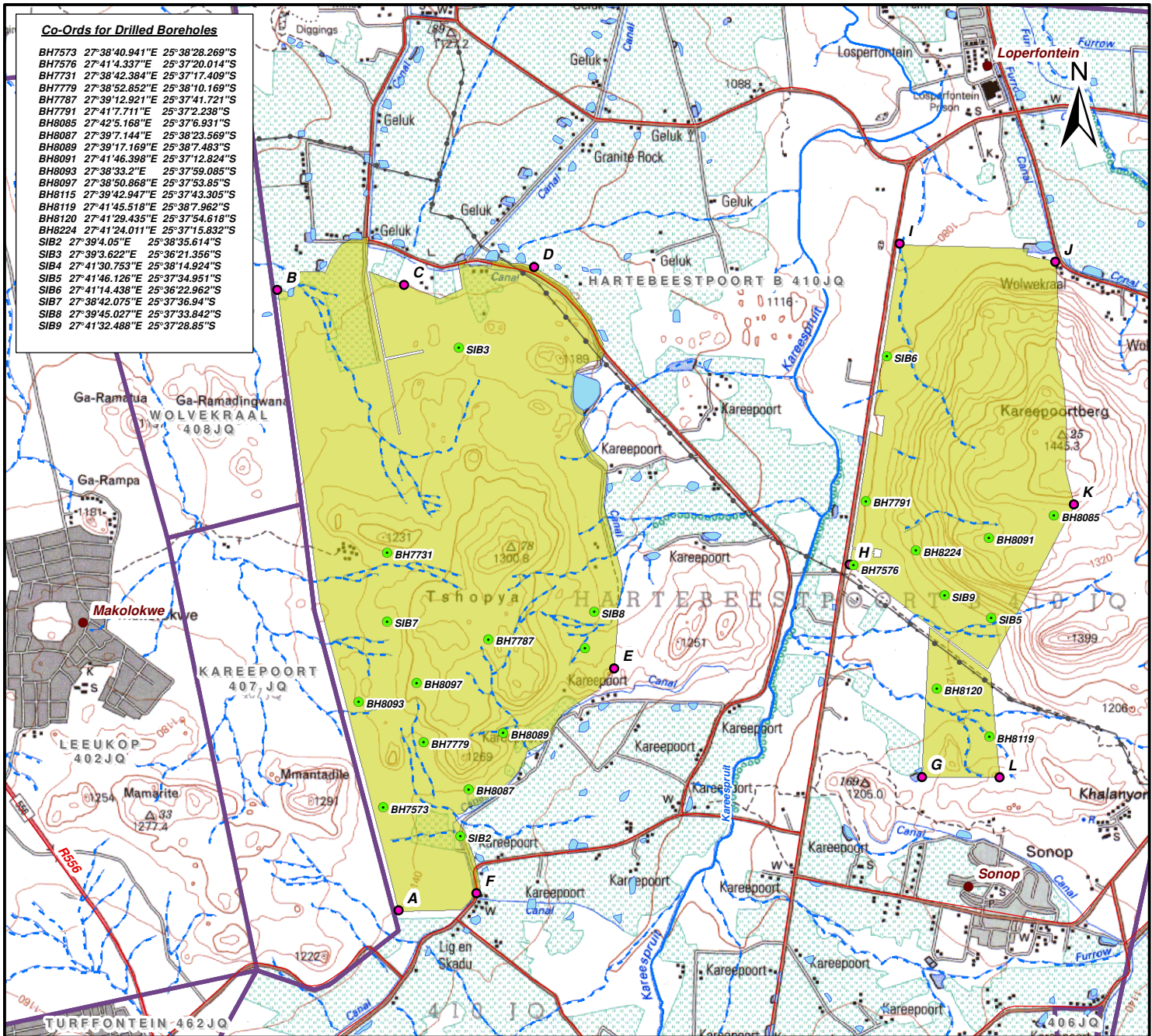
Imbasa Platinum (Pty) Ltd

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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SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the Imbasa 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 activities are included in Section 3.1.

TERMS OF REFERENCE

SLR, as the independent EAP, is responsible for undertaking the required environmental regulatory process and conducting the public participation process. The terms of reference for the environmental regulatory process are to:

- Make application for Environmental Authorisation of the project in terms of NEMA;
- Make application for the Closure of the proposed project in terms of the MPRDA;
- Ensure the BA is undertaken in accordance with the requirements of NEMA and the EIA Regulations 2014 (as amended);
- Ensure the BA is undertaken in an open, participatory manner to ensure that all potential impacts are identified;
- Undertake a formal public participation process, which includes the distribution of information to I&APs and provides the opportunity for I&APs to raise any concerns/issues, as well as an opportunity to comment on all BA documentation; and
- Integrate all information, including the findings of the specialist studies and other relevant information, into a BAR to allow an informed decision to be taken on the proposed project.

Further to this and in accordance with Appendix 1 of the EIA Regulations 2014 (as amended), the objectives of a BA process is to:

- Determine the policy and legislative context within which the proposed activity is located and how the activity complies with and responds to the policy and legislative context;
- Identify the alternatives considered, including the activity, location, and technology alternatives;
- Describe the need and desirability of the proposed alternatives;
- Through the undertaking of an impact and risk assessment process inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine -
 - (i) The nature, significance, consequence, extent, duration, and probability of the impacts occurring;
 - (ii) The degree to which these impacts can be reversed, may cause irreplaceable loss of resources; and can be avoided, managed or mitigated;
- Through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to:
 - (i) Identify and motivate a preferred site, activity and technology alternative;
 - (ii) Identify suitable measures to avoid, manage or mitigate identified impacts; and
 - (iii) Identify residual risks that need to be managed and monitored.

This BA process consists of a series of steps to ensure compliance with these objectives and the EIA Regulations 2014. The process involves an open, participatory approach to ensure that all impacts are identified and that decision-making takes place in an informed, transparent and accountable manner.

OPPORTUNITY TO COMMENT

This BAR 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 BA 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 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 BAR and/or summary is available for review.

All comments received during the review process will be addressed in the BAR submitted to the DMRE for decision-making purposes.

SLR Consulting (Africa) (Pty) Ltd

Attention: Reinett Mogotshi

PO Box 1596, Cramerview 2060 (if using post please call SLR to notify us of your submission)

Tel: (011) 467 0945

Fax: (011) 467 0978

E-mail: rmogotshi@slrconsulting.com

PART A – SCOPE OF ACTIVITY AND ENVIRONMENTAL IMPACT ASSESSMENT

1 DETAILS OF THE APPLICANT AND THE EAP

1.1 APPLICANT DETAILS

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

TABLE 1-1: APPLICANT DETAILS

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

1.2 DETAILS OF THE EAP WHO PREPARED THE REPORT

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

SLR has no vested interest in the proposed project other than fair payment for consulting services rendered as part of the BA process and has declared its independence as required by the EIA Regulations 2014 (as amended). An undertaking by SLR is provided in Section 17.

TABLE 1-2: DETAILS OF THE BA 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, EMPr, 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

1.3 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 IAIAAsa.

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

2 LOCATION OF ACTIVITY

2.1 LOCATION OF OVERALL ACTIVITY

A description of the property on which the proposed project is located is provided in Table 2-1

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																																							

2.2 LOCALITY MAP

The regional and local settings are illustrated in Figure 1 and Figure 2, respectively.

3 DESCRIPTION OF THE SCOPE OF THE ACTIVITY

This chapter lists the applicable listed activities and provides general information on the proposed project and a description of the proposed closure of the Imbasa prospecting right.

3.1 LISTED AND SPECIFIED ACTIVITIES

The proposed project triggers a listed activity for which authorisation, is required in terms of the NEMA. The associated listed or specified activity is summarised in the table below. The legislative context pertaining to the listed activity is outlined in Section 4.

TABLE 3-1: PROJECT ACTIVITIES AND ASSOCIATED LISTED ACTIVITIES

Description of the proposed project activity	Aerial extent of the activity (ha)	Listed activity (mark with an x)	Listed activity number, applicable listing notice and activity description
Closure of already decommissioned prospecting activities (which include drill sites, camp sites and access tracks). It should be noted that no drilling or related activities have taken place since 2014.	Prospecting right area requiring closure: 1 673 ha (extent of the Imbasa prospecting right area)	X	<p>Activity 22 of Listing Notice 1 (GNR 983)</p> <p>The decommissioning of any activity requiring –</p> <p>(i) a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002);</p> <p>but excluding the decommissioning of an activity relating to the secondary processing of a –</p> <p>(a) mineral resource, including the smelting, beneficiation, reduction, refining, calcining or gasification of the mineral resource; or</p> <p>(b) petroleum resource, including the refining of gas, beneficiation, oil or petroleum products; –</p> <p>in which case activity 31 in this Notice applies.</p> <p>This is applicable to the decommissioning of the drill holes since "decommissioning" means to take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned.</p> <p>This activity is triggered as a closure certificate is being applied for in terms of Section 43 of the MPRDA for closure of a Prospecting Right.</p>

3.2 DESCRIPTION OF THE PROSPECTING ACTIVITIES

3.2.1 Overview of prospecting activities

Prospecting activities undertaken between 2004 and 2014 included:

- Use of existing roads/ tracks (as far as possible);
- Establishment and use of new access tracks where prospecting related vehicles had to deviate from existing roads;
- Establishment of a small temporary drill camp;
- Drilling of 24 approved drill holes (BH7573, BH7576, BH7731, BH7779, BH7787, BH7791, BH8085, BH8087, BH8089, BH8091, BH8093, BH8097, BH8115, BH8119, BH8120, BH8224, SIB2, SIB3, SIB4, SIB5, SIB6, SIB7, SIB8 and SIB9) (see Figure 3); and
- Establishment and use of site equipment and support facilities (drill rigs, trucks, plastic lined drilling water containment facility (sump), water cart, core sample trays) and portable chemical toilets etc.

3.2.2 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 EMP, 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.

Passive Phase - Aftercare and maintenance

Typically, a period of aftercare and maintenance is applied to each rehabilitated drill site to ensure closure objectives are being met. Given the nature of the prospecting activities, a 2 to 3-year period of maintenance and aftercare is usually applied.

For the drill sites, the aftercare and maintenance activities included the monitoring of erosion and vegetation establishment and control and eradication of alien invasive plants.

3.2.3 A summary of progressive rehabilitation and current status of the disturbed areas

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 3.2.2 above.

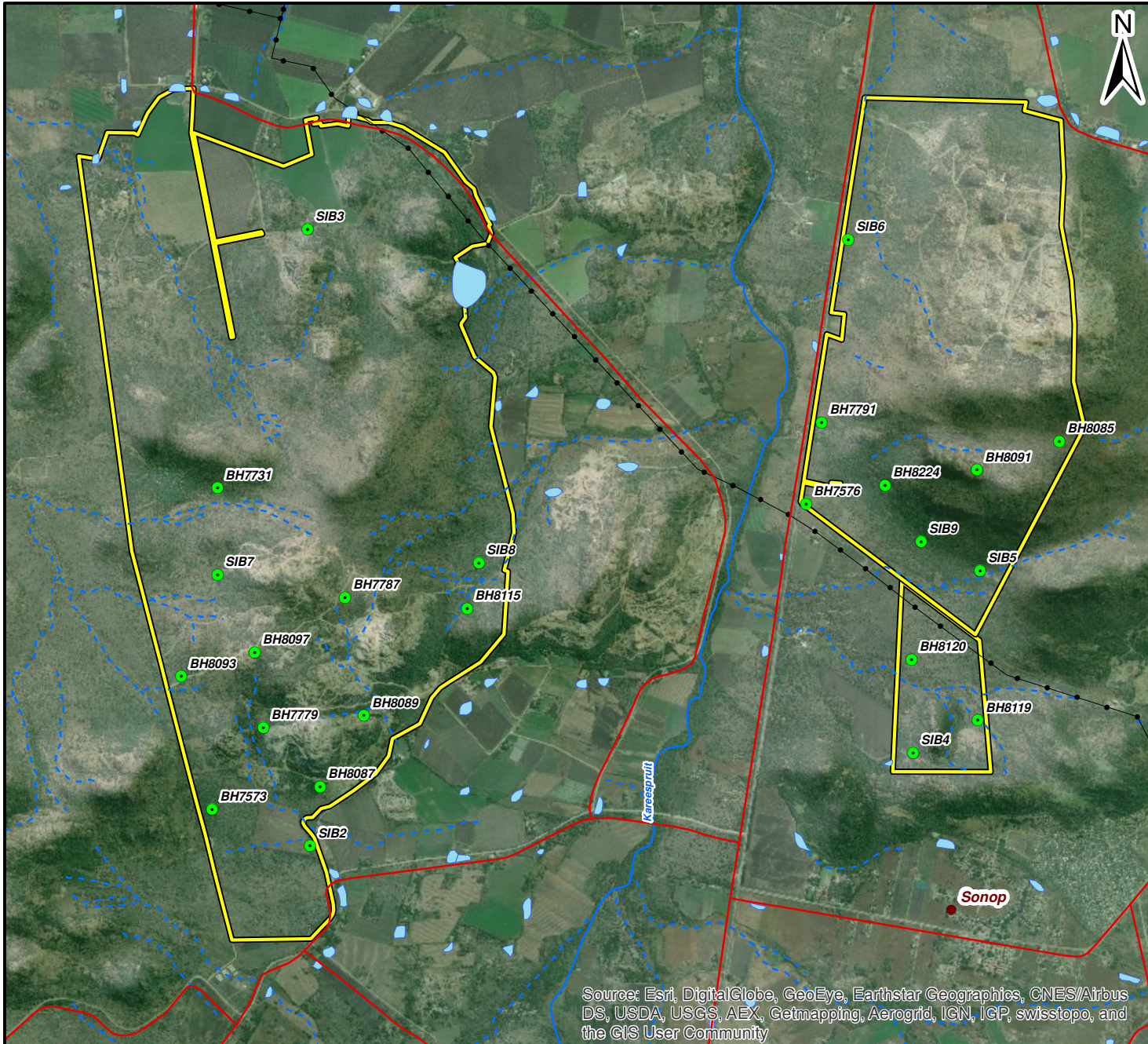
According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites BH8224 and BH7791 (completed in 2013 and 2014) was still 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 sites¹ 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 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.

The final environmental audit completed forms part of this submission. Further detail is included in the final environmental audit in Section 8.2.

¹Drill Sites BH8093, BH7791 and BH7573

²Drill 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)



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

Imbasa Platinum (Pty) Ltd

Figure 3

Layout of Decommissioned Prospecting Drill Sites



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710.09007.00007

2020/02/28

4 POLICY AND LEGISLATIVE CONTEXT

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 BA process.

4.1 LEGISLATIVE CONSIDERATION IN THE PREPARATION OF THE BASIC ASSESSMENT REPORT

In accordance with the EIA Regulations 2014 (as amended) and the DMRE BAR template requirements, all legislation and guidelines that have been considered in the BA process must be documented. Table 4-1 below provides a summary of the applicable legislative context.

TABLE 4-1: 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 4-3	An outline of the legislation is presented in Section 4.1.1. The project will require a closure certificate.
National Environmental Management Act (No. 107 of 1998) (NEMA), as amended and 2014 EIA Regulations, as amended	Introduction, Section 3.1, and Table 4-3	An outline of the legislation is presented in Section 4.1.2. 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 18 and 27	A Financial Provision is required in line with the NEMA Regulations and is included in this report.
Alien Invasive Species Regulations GN 598 of 2014 in terms of the NEM:BA	Section 0 and 7.4.1	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).		

4.1.1 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 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.

4.1.2 National Environmental Management Act, 1998

The National Environmental Management Act, 1998 (No. 107 of 1998), as amended, establishes principles and provides a regulatory framework for decision-making on matters affecting the environment. All organs of state must apply the range of environmental principles included in Section 2 of NEMA when taking decisions that significantly affect the environment. Included amongst the key principles is that all development must be socially, economically and environmentally sustainable and that environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably. The participation of I&APs is stipulated, as is that decisions must take into account the interests, needs and values of all I&APs.

Chapter 5 of NEMA provides a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for granting of environmental authorisations. To give effect to the general objectives of Integrated Environmental Management, the potential impacts on the environment of listed or specified activities must be considered, investigated, assessed and reported on to the competent authority. Section 24(4) provides the minimum requirements for procedures for the investigation, assessment, management and communication of the potential impacts.

In terms of the management of impacts on the environment, Section 24N details the requirements for an EMPr.

EIA Regulations 2014

The EIA Regulations, 2014 (as amended by GN No. 326 of 7 April 2017) promulgated in terms of Chapter 5 of NEMA provide for control over certain listed activities. These listed activities are detailed in Listing Notice 1 (as amended by GN No. 327 of 7 April 2017), Listing Notice 2 (as amended by GN No. 325 of 7 April 2017) and Listing Notice 3 (as amended by GN No. 324 of 7 April 2017). The undertaking of activities specified in the Listing Notices is prohibited until Environmental Authorisation has been obtained from the competent authority. Such Environmental Authorisation, which may be granted subject to conditions, will only be considered once there has been compliance with the EIA Regulations, 2014.

The EIA Regulations, 2014 (as amended) set out the procedures and documentation that need to be complied with when applying for Environmental Authorisation. The proposed project triggers an activity listed in Government GN 983 (Listing Notice 1; as amended) (refer to Table 3-1) and therefore a BA process is required in order for the DMRE to consider the application in terms of NEMA.

Since the proposed project is for the closure of prospecting right, a closure plan and an environmental audit report are required in terms of Appendix 5 and 7 of the EIA Regulation, respectively.

4.2 GUIDELINES, POLICIES, PLANS AND FRAMEWORKS

The guidelines, policies and plans listed in Table 4-2 have been taken into account during the BA process, where applicable.

TABLE 4-2: 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 BA 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.
Madibeng Local Municipality Integrated Development Plan 2018-2019	Madibeng Local Municipality	The Madibeng 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.
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.

4.3 LEGISLATIVE BASIC ASSESSMENT REPORT CONTENT REQUIREMENTS

This document has been prepared in accordance with the DMRE BAR template format and was informed by the guidelines posted on the official DMRE website. This report also complies with the requirements of the NEMA and Appendix 1 and Appendix 4 of EIA Regulations 2014, as amended (GN 982). Table 4-3 provides a summary of the requirements, with cross references to the report sections where these requirements have been addressed.

Regulation 19(7) of the EIA Regulations 2014 notes that the content of a closure plan may be combined with the content of an EMPr on condition that the requirements of both Appendices 5 and 4, respectively, are met. These requirements, with cross references to the report sections where these requirements have been addressed are included in Table 4-3.

TABLE 4-3: CONTENTS OF THE BAR

BAR requirement as per the DMRE template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
Part A of DMRE report template	Appendix 1 of the NEMA regulations, as amended	Section/Appendix
Details of the EAP.	Details of the EAP who prepared the report.	Section 1.2.
Expertise of the EAP.	Details of the expertise of the EAP, including curriculum vitae.	Section 1.3 and Appendix B.
Location of overall activity.	The location of the activity, including - the 21-digit Surveyor General code of each cadastral land parcel. Where available the physical address and farm name. Where the required information is not available, the coordinates of the boundary of the property or properties.	Section 2
Locality plan.	A plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken or on land where the property has	Section 2.

BAR requirement as per the DMRE template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
	not been defined, the coordinates within which the activity is to be undertaken.	
Description of the scope of the proposed overall activity.	A description of the scope of the proposed activity, including all listed and specified activities triggered. A description of the activities to be undertaken, including associated structure and infrastructure.	Section 3.
Policy and legislative context.	A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and how the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks, and instruments	Section 4.
Need and desirability of the proposed activity.	A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location.	Section 5.
Motivation for the overall preferred site, activities and technology alternative.	A motivation for the preferred site, activity and technology alternative.	Section 6.
A full description of the process followed to reach the proposed development footprint within the site.	A full description of the process followed to reach the proposed development footprint within the approved site.	Section 7.
Details of the development footprint alternatives considered.	Details of all the alternatives considered.	Section 7.1.
Details of the public participation process followed.	Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs.	Section 7.2.
Summary of issues raised by I&APs.	A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.	Section 7.3.
Environmental attributes associated with the alternatives.	The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	Section 7.4.
Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts including the degree of the impacts.	The impacts and risks identified, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources and can be avoided, managed and mitigated.	Section 7.5.
Methodology used in determining the nature, significance, consequence, extent, duration and probability of potential environmental impacts and risks.	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives.	Section 7.6.
The positive and negative impacts that the proposed activity (in terms of the initial site layout) and alternative will	Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	Section 7.7.

BAR requirement as per the DMRE template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
have on the environment and the community that may be affected.		
The possible management actions that could be applied and the level of risk.	The possible management actions that could be applied and level of residual risk.	Section 7.8.
Motivation where no alternative sites were considered.	The outcome of the site selection matrix. If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such.	Section 7.9.
Statement motivating the alternative development location within the overall site.	A concluding statement indicating the preferred alternatives, including preferred location of the activity.	Section 7.10.
Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site (in respect of the final site layout) through the life of the activity.	A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity including a description of all environmental issues and risks that were identified during the environmental impact assessment process and an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.	Section 8.
Assessment of each identified potentially significant impact and risk.	An assessment of each identified potentially significant impact and risk including cumulative impacts, the nature, significant and consequence of the impact and risk, the extent and duration of the impact and risk, the probability of the impact and risk occurring, the degree to which the impact can be reversed, the degree to which the impact and risk may cause irreplaceable loss of a resources and the degree to which the impact and risk can be avoided, managed or mitigated.	Section 9 and Appendix D.
Summary of specialist reports.	Where applicable the summary of the findings and recommendations of any specialist report complying with Appendix 6 of these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report.	Section 10.
Environmental impact statement.	An environmental impact statement which contains a summary of the key findings of the environmental impact assessment, a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers and a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.	Section 11.
Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr.	Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr.	Section 12.
Aspects for inclusion as conditions of authorisation.	Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	Section 13.
Description of any assumptions, uncertainties and gaps in knowledge.	A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and management actions proposed.	Section 14.
Reasoned opinion as to whether the proposed activity should or should not be authorised.	Reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be	Section 15

BAR requirement as per the DMRE template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
	authorised, any conditions that should be made in respect of that authorisation.	
Period for which environmental authorisation is required.	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded, and the post construction monitoring requirements finalised.	Section 16.
Undertaking.	An undertaking under oath or affirmation by the EAP in relation to the correctness of the information provided in the reports, the inclusion of comments and inputs from stakeholders and I&APs, the inclusion of inputs and recommendations from the specialist reports where relevant and any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties.	Section 17.
Financial provision.	Where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts.	Section 18.
Specific information required by the competent authority.	Any specific information required by the competent authority.	Section 19.
Other matter required in terms of section 24(4)(a) and (b) of the Act.	Any other matter required in terms of section 24(4)(a) and (b) of the Act.	Section 20.
Part B of the DMRE report template	Appendix 4 of the NEMA regulations	Section/Appendix
Details of EAP.	Details of the EAP who prepared the EMPr and the expertise of that EAP to prepare the EMPr, including curriculum vitae.	Section 21.
Description of the aspects of the activity.	A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.	Section 22.
Composite map.	A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that any areas that should be avoided, including buffers.	Section 23.
Description of impact management objectives including management statements.	A description of the impact management objectives, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including planning and design, pre-construction activities, construction activities, rehabilitation of the environment after construction and where applicable post closure; and where relevant, operation activities.	Section 24.1.
Impacts to be mitigated in their respective phases.	-	Section 24.6
Impact management outcomes.	A description and identification of impact management outcomes required for the aspects contemplated in paragraph above.	Section 25
Impact management actions.	A description of proposed impact management actions, identifying the manner in which the impact management objectives and outcomes be achieved, and must, where applicable, include actions to avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation; comply with any prescribed environmental management standards or practices; comply with any applicable provisions of the Act regarding closure, where applicable and comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable.	Section 26.
Financial provision.		Section 27.

BAR requirement as per the DMRE template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
Mechanism for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon.	The method of monitoring the implementation of the impact management actions.	Section 28.
	The frequency of monitoring the implementation of the impact management actions.	
	An indication of the persons who will be responsible for the implementation of the impact management actions.	
	The time periods within which the impact management actions must be implemented.	
	The mechanism for monitoring compliance with the impact management actions.	
	A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.	
Environmental Awareness Plan.	An environmental awareness plan describing the manner in which the applicant intends to inform his or her employees of any environmental risk which may result from their work; and risks must be dealt with in order to avoid pollution or the degradation of the environment.	Section 30.
Specific information required by the competent authority.	Any specific information that may be required by the competent authority.	Section 31.
Undertaking.	-	Section 32.

TABLE 4-4: CONTENTS OF THE CLOSURE PLAN

NEMA Closure Report Requirements as per Appendix 5 of NEMA Regulations	Reference in the EMPr report
Details of the EAP who prepared the closure plan	Section 1.2.
The expertise of that EAP.	Section 1.3, Appendix B.
Closure objectives.	Section 24.1
Proposed mechanisms for monitoring compliance with and performance assessment against the closure plan and reporting thereon.	Section 28
Measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity and associated closure to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development, including a handover report, where applicable.	Section 3.2.3
Information on any proposed avoidance, management and mitigation measures that will be taken to address the environmental impacts resulting from the undertaking of the closure activity.	Section 26
A description of the manner in which it intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation during closure; remedy the cause of pollution or degradation and migration of pollutants during closure; comply with any prescribed environmental management standards or practices; and comply with any applicable provisions of the Act regarding closure.	
The process for managing any environmental damage, pollution, pumping and treatment of extraneous water or ecological degradation as a result of closure.	
Time periods within which the measures contemplated in the closure plan must be implemented.	Section 26
Details of all public participation processes conducted in terms of regulation 41 of the Regulations, including copies of any representations and comments received from registered interested and affected parties; a summary of comments received from, and a summary of issues raised by registered interested and affected parties, the date of receipt of these comments and the response of the EAP to those comments; the minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants; where applicable, an indication of the amendments made to the plan as a result of public participation processes conducted in terms of regulation 41 of these Regulations.	Section 7.2

NEMA Closure Report Requirements as per Appendix 5 of NEMA Regulations	Reference in the EMPr report
Where applicable, details of any financial provisions for the rehabilitation, closure and on-going post decommissioning management of negative environmental impacts.	Section 18 and 27

5 NEED AND DESIRABILITY OF THE PROJECT

The DEA guideline on need and desirability (GNR 891, 20 October 2014) notes that while addressing the growth of the national economy through the implementation of various national policies and strategies, it is also essential that these policies take cognisance of strategic concerns such as climate change, food security, as well as the sustainability in supply of natural resources and the status of our ecosystem services. Thus, the over-arching framework for considering the need and desirability of development in general is taken at the policy level through the identification and promotion of activities / industries / developments required by civil society as a whole. The DEA guideline further notes that at a project level (as part of an EIA process), the need and desirability of the project should take into consideration the content of regional and local plans, frameworks and strategies.

5.1 ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

Due to the nature of prospecting projects, impacts on biodiversity are possible, albeit that they are limited. The proposed closure of the Imbasa prospecting right implies that Imbasa will not undertake further exploration activities in the area and in this regard, biodiversity will be allowed to restore to its pre-project state. It should however be noted that biodiversity in the prospecting right area has already been compromised by land uses such as subsistence livestock grazing, cultivation and granite quarrying. The decommissioning and rehabilitation of drill sites is therefore aligned with ensuring ecological sustainable development and use of natural resources.

5.2 PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT

Community/society priorities are officially expressed through public documents including the provincial growth and development strategy and spatial development framework documents. In this regard, the priorities of the Madibeng Local Municipality's Integrated Development Framework (IDP) and the Bojanala Platinum District Municipality IDPs are mainly focused around provision of basic services and infrastructure, diversified economic growth and job creation, maintaining a clean, green and healthy municipal environment and sustainable rural development. Although the closure of the Imbasa prospecting right precludes the possibility of future mining of that area by Imbasa, this does allow for new third-party applications to be lodged with the DMRE. This in turn, has the potential for increased economic benefits to third party applicants (should a viable mineable resource be found during prospecting), thereby aligning with the planned growth and development objectives contained in the IDPs.

5.3 RATIONALE FOR THE PROPOSED PROJECT ACTIVITY

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 closure of the Imbasa prospecting right would allow for new third-party applications to be lodged with the DMRE.

6 MOTIVATION FOR THE PREFERRED SITE, ACTIVITIES AND TECHNOLOGY ALTERNATIVES

The proposed project is the closure of the Imbasa prospecting right associated with a specific area. Decommissioning activities have been completed. This section is therefore not applicable. Refer to Section 7.1 for further detail.

7 FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ALTERNATIVES WITHIN THE SITE

7.1 DETAILS OF THE DEVELOPMENT FOOTPRINT CONSIDERED

This report is in support of a closure application for the Imbasa prospecting right and therefore development footprint alternatives (relating to site, activity or technology) are not applicable.

7.1.1 The “no-go” alternative

The “no-go” alternative is not applicable to this project since the Imbasa prospecting right was abandoned on 16 August 2019, prior to its expiry on 07 February 2020, and in this regard a closure application needs to be submitted to DMRE by 07 May 2020.

7.2 DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED

This section describes the public participation process undertaken during the BAR process. The public participation process was undertaken in accordance with the requirements of Chapter 6 of Regulations 982 of 4 December 2014 (EIA Regulations), as amended. In addition to this, consideration was also given to the public participation guideline in terms of the NEMA (2017).

7.2.1 Public Participation Process undertaken to date

A public participation process is being undertaken to inform the BA process and includes consideration of the Closure Plan consultation requirements in terms of the NEMA EIA Regulations. 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 7-1 below and supporting documentation is presented in Appendix C.

TABLE 7-1: PUBLIC PARTICIPATION PROCESS UNDERTAKEN AS PART OF THE BAR

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;

Steps	Details
	<ul style="list-style-type: none"> • 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 7.3 and attached in 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 BAR 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.
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	Laminated site notices (in English and Setswana) were placed in the prospecting right area and other publicly accessible locations on 29 th and 30 th 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.
Newspaper advertisements	A block advertisement was placed in the Brits Pos on 30 th January 2020. A copy of the advertisement is included in Appendix C.

7.2.2 Review of the Basic Assessment Report

This BAR (in terms of NEMA) and Closure Plan Report (in terms of MPRDA) has been made available for public and commenting authority review and comment for a period of 30 days. A summary of the BAR (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 BAR and/or summary is available for review.

The electronic copy of the BAR will be made available on the SLR website.

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

7.2.3 Completion of the Basic Assessment Report

Following closure of the BAR commenting period, all comments received will be incorporated and responded to in a Comments and Responses Report. Where required the BAR and Closure Plan Report 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.

7.3 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 7-2 below. All comments/questions received during the BAR review period will continue to be collated and responded to in a Comments and Responses Report.

TABLE 7-2: 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 7.2
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

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
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 7.2
Landowners				
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 BAR and translated summary documents are being made available for public review and comment, it was not deemed necessary to have meetings.	Section 7.2
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</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
		<p>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 comment as per section 38(4) and 38(8) of the NHRA</p>		
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>A Letter of Recommendation for Exemption has been provided by the heritage specialist Dr. Julius Pistorius.</p>	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>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 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</p>		

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
		designated official using the case number quoted above in the case header.		
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 the database for claims lodged by 31 December 1998.	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 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

7.4 ENVIRONMENTAL ATTRIBUTES ASSOCIATED WITH THE ALTERNATIVES

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

As part of verifying baseline conditions within the prospecting right area, 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 33) has been used.

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

7.4.1 Baseline environment affected by the proposed activity

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

Heritage/Cultural and Palaeontological 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.

Socio-economic and Current Land Uses

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 4 provides a delineation of the farm boundaries for the farms listed in the table below.

TABLE 7-3: 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

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.

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 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 7-4 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 7-4: CURRENT LANDUSES AT THE DRILL SITES

Land use	Drill Site
Granite Quarrying	BH7779
	BH8087
	BH8097

Land use	Drill Site
	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.

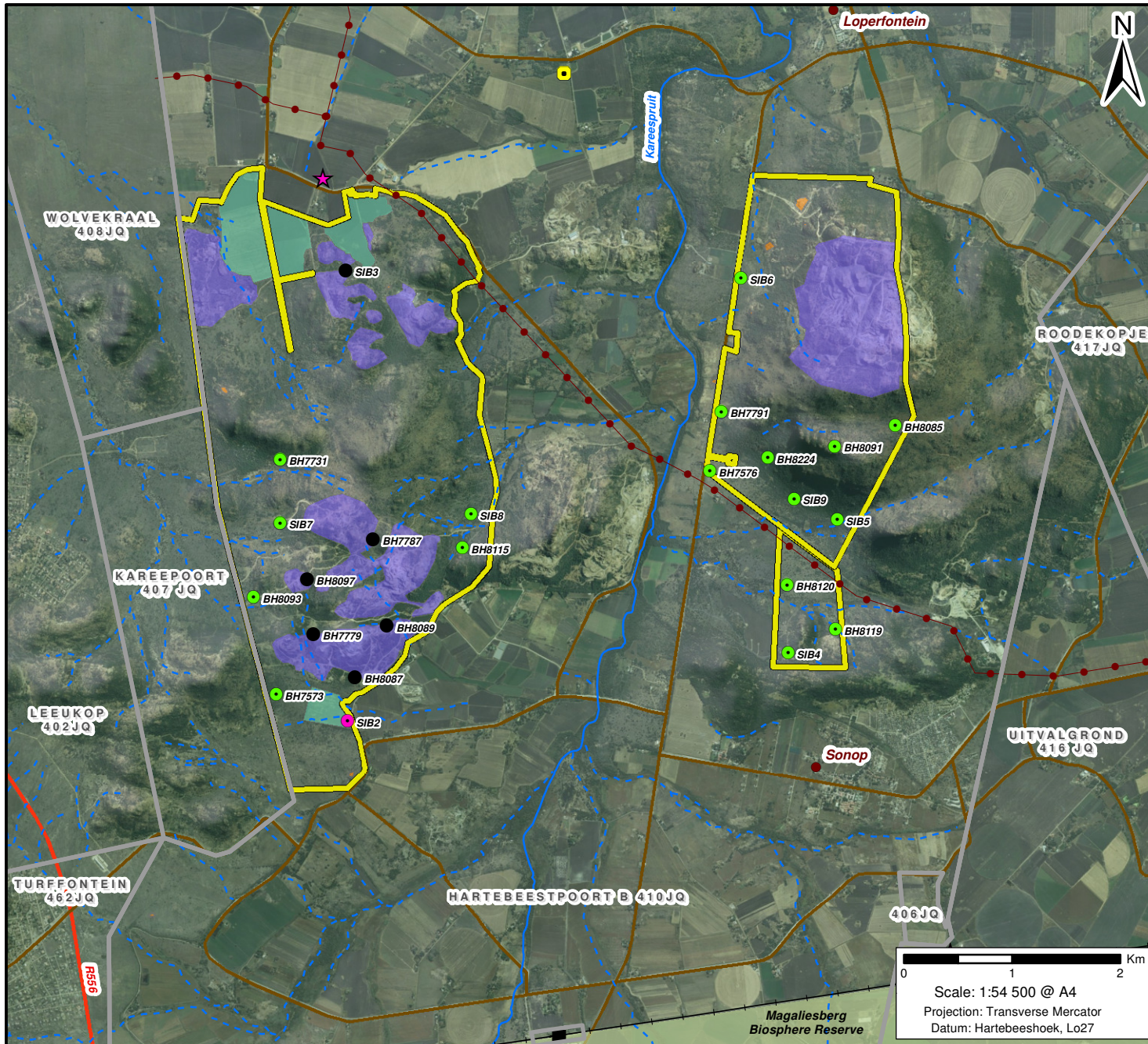
7.4.2 Description of specific environmental features and infrastructure on the site

The environmental features and infrastructure in the broader prospecting right area is described in 7.4.1. 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.

7.4.3 Environment and current land use map

A conceptual map showing areas under closure including final and future land uses surrounding the prospecting right area is provided in Figure 4.



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

SLR SLR Consulting (Africa) (Pty) Ltd
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710.09003.00013

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7.5 ENVIRONMENTAL IMPACTS AND RISKS

As noted in Section 7.1, no alternatives are applicable to the project and as such an assessment of alternatives is not applicable.

7.6 METHODOLOGY USED IN DETERMINING THE SIGNIFICANCE OF ENVIRONMENTAL IMPACTS

Both the criteria used to assess the impacts and the method of determining the significance of the impacts is outlined in Table 7-5. This method complies with the method provided in the EIA guideline document. Part A provides the approach for determining impact consequence (combining intensity, extent and duration). Impact consequence and significance are determined from Part B and C. The consequence rating is considered together with the probability of occurrence in order to determine the overall significance of each impact. The interpretation of the impact significance is given in Part D. The significance of the impact can be related to the level of risk associated with a specific issue.

TABLE 7-5: IMPACT ASSESSMENT METHODOLOGY

PART A: DEFINITIONS AND CRITERIA*		
Definition of SIGNIFICANCE		Significance = consequence x probability
Definition of CONSEQUENCE		Consequence is a function of intensity, spatial extent and duration
Criteria for ranking of the INTENSITY of environmental impacts	VH	Severe change, disturbance or degradation. Associated with severe consequences. May result in severe illness, injury or death. Targets, limits and thresholds of concern continually exceeded. Substantial intervention will be required. Vigorous/widespread community mobilization against project can be expected. May result in legal action if impact occurs.
	H	Prominent change, disturbance or degradation. Associated with real and substantial consequences. May result in illness or injury. Targets, limits and thresholds of concern regularly exceeded. Will definitely require intervention. Threats of community action. Regular complaints can be expected when the impact takes place.
	M	Moderate change, disturbance or discomfort. Associated with real but not substantial consequences. Targets, limits and thresholds of concern may occasionally be exceeded. Likely to require some intervention. Occasional complaints can be expected.
	L	Minor (Slight) change, disturbance or nuisance. Associated with minor consequences or deterioration. Targets, limits and thresholds of concern rarely exceeded. Require only minor interventions or clean-up actions. Sporadic complaints could be expected.
	VL	Negligible change, disturbance or nuisance. Associated with very minor consequences or deterioration. Targets, limits and thresholds of concern never exceeded. No interventions or clean-up actions required. No complaints anticipated.
	VL+	Negligible change or improvement. Almost no benefits. Change not measurable/will remain in the current range.
	L+	Minor change or improvement. Minor benefits. Change not measurable/will remain in the current range. Few people will experience benefits.
	M+	Moderate change or improvement. Real but not substantial benefits. Will be within or marginally better than the current conditions. Small number of people will experience benefits.
	H+	Prominent change or improvement. Real and substantial benefits. Will be better than current conditions. Many people will experience benefits. General community support.
	VH+	Substantial, large-scale change or improvement. Considerable and widespread benefit. Will be much better than the current conditions. Favourable publicity and/or widespread support expected.
Criteria for ranking the DURATION of impacts	VL	Very short, always less than a year. Quickly reversible
	L	Short-term, occurs for more than 1 but less than 5 years. Reversible over time.
	M	Medium-term, 5 to 10 years.
	H	Long term, between 10 and 20 years. (Likely to cease at the end of the operational life of the activity)
	VH	Very long, permanent, +20 years (Irreversible. Beyond closure)
Criteria for ranking the EXTENT of impacts	VL	A part of the site/property.
	L	Whole site.
	M	Beyond the site boundary, affecting immediate neighbours
	H	Local area, extending far beyond site boundary.
	VH	Regional/National

PART B: DETERMINING CONSEQUENCE							
INTENSITY = VL							
DURATION	Very long	VH	Low	Low	Medium	Medium	Medium
	Long term	H	Low	Low	Low	Medium	Medium
	Medium term	M	Very Low	Low	Low	Low	Medium
	Short term	L	Very low	Very Low	Low	Low	Low
	Very short	VL	Very low	Very Low	Very Low	Low	Low
INTENSITY = L							
DURATION	Very long	VH	Medium	Medium	Medium	Medium	Medium
	Long term	H	Low	Medium	Medium	Medium	Medium
	Medium term	M	Low	Low	Medium	Medium	Medium
	Short term	L	Low	Low	Low	Medium	Medium
	Very short	VL	Very low	Low	Low	Low	Medium
INTENSITY = M							
DURATION	Very long	VH	Medium	Medium	Medium	Medium	Medium
	Long term	H	Medium	Medium	Medium	Medium	Medium
	Medium term	M	Medium	Medium	Medium	Medium	Medium
	Short term	L	Low	Medium	Medium	Medium	Medium
	Very short	VL	Low	Low	Low	Medium	Medium
INTENSITY = H							
DURATION	Very long	VH	Medium	Medium	Medium	Medium	Medium
	Long term	H	Medium	Medium	Medium	Medium	Medium
	Medium term	M	Medium	Medium	Medium	Medium	Medium
	Short term	L	Medium	Medium	Medium	Medium	Medium
	Very short	VL	Low	Medium	Medium	Medium	Medium
INTENSITY = VH							
DURATION	Very long	VH	Medium	Medium	Medium	Medium	Medium
	Long term	H	Medium	Medium	Medium	Medium	Medium
	Medium term	M	Medium	Medium	Medium	Medium	Medium
	Short term	L	Medium	Medium	Medium	Medium	Medium
	Very short	VL	Low	Medium	Medium	Medium	Medium

VL	L	M	H	VH
A part of the site/ property	Whole site	Beyond the site, affecting neighbours	Extending far beyond site but localised	Regional/ National
EXTENT				

PART C: DETERMINING SIGNIFICANCE							
PROBABILITY (of exposure to impacts)	Definite/ Continuous	VH	Very Low	Low	Medium	Medium	Medium
	Probable	H	Very Low	Low	Medium	Medium	Medium
	Possible/ frequent	M	Very Low	Very Low	Low	Medium	Medium
	Conceivable	L	Insignificant	Very Low	Low	Medium	Medium
	Unlikely/ improbable	VL	Insignificant	Insignificant	Very Low	Low	Medium
			VL	L	M	H	VVH
CONSEQUENCE							

PART D: INTERPRETATION OF SIGNIFICANCE	
Significance	Decision guideline
Very High	Potential fatal flaw unless mitigated to lower significance.
High	It must have an influence on the decision. Substantial mitigation will be required.
Medium	It should have an influence on the decision. Mitigation will be required.
Low	Unlikely that it will have a real influence on the decision. Limited mitigation is likely required.
Very Low	It will not have an influence on the decision. Does not require any mitigation
Insignificant	Inconsequential, not requiring any consideration.

*VH = very high, H = high, M= medium, L= low and VL= very low and + denotes a positive impact.

7.7 POSITIVE AND NEGATIVE IMPACTS OF THE PROPOSED ACTIVITY AND ALTERNATIVES

As noted in Section 7.1, no site layout or infrastructure locational alternatives are relevant and as such an assessment of alternatives is not applicable to the project. The preferred project alternative is assessed in Section 9.

7.8 POSSIBLE MANAGEMENT ACTIONS THAT COULD BE APPLIED AND THE LEVEL OF RISK

Issues raised do not require any mitigation to be implemented, refer to Section 7.3. As such this section is not applicable.

7.9 MOTIVATION WHERE NO ALTERNATIVE SITES WERE CONSIDERED

No feasible alternatives exist for the proposed project and as such this section is not applicable. Refer to Section 7.1 for further detail.

7.10 STATEMENT MOTIVATING THE PREFERRED ALTERNATIVE

No feasible alternatives exist for the proposed project and as such this section is not applicable. Refer to Section 7.1 for further detail.

8 FULL DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS AND RISKS THE ACTIVITY WILL IMPOSE ON THE PREFERRED SITE THROUGH THE LIFE OF THE ACTIVITY

8.1 DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY IMPACTS

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

As part of the public participation process, I&APs and commenting authorities (see Section 7.2) are being provided with opportunities to provide input into the BAR process and comment on the project, including the identification of environmental and socio-economic impacts.

8.2 FINAL ENVIRONMENTAL AUDIT

A final environmental audit 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 environmental audit:

- 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;
 - 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 sites³ 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 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);
- 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; 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 F.

³ 3 Drill Sites BH8093, BH7791 and BH7573

⁴ 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).

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>

8.3 DESCRIPTION OF THE PROCESS UNDERTAKEN TO ASSESS AND RANK THE IMPACTS AND RISKS

A description of the assessment methodology used to assess the severity of identified impacts (including the nature of impacts and the degree to which impacts may cause irreplaceable loss of resources), the extent of the impacts, the duration and reversibility of impacts, the probability of the impact occurring, and the degree to which the impacts can be mitigated is provided in Section 7.5.

8.4 A DESCRIPTION OF THE ENVIRONMENTAL IMPACTS AND RISKS IDENTIFIED DURING THE ENVIRONMENTAL ASSESSMENT PROCESS

Table 8-1 provides a description of the impacts on environmental and socio-economic aspects in respect of each of the main project actions/ activities and processes that will be assessed in Section 8.

TABLE 8-1: LIST OF POTENTIAL IMPACTS AS THEY RELATED TO THE PROPOSED PROJECT

Potential impact	Activity	Alternative	Project phases
Loss of flora and fauna through lack of or poor rehabilitation	Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Closure of the Imbasa prospecting right	Closure and rehabilitation
Loss of pre-prospecting land uses through lack of or poor rehabilitation	Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Closure of the Imbasa prospecting right	Closure and rehabilitation
Change in the visual landscape of the area	Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Closure of the Imbasa prospecting right	Closure and rehabilitation
Negative and positive socio-economic impacts	Imbasa’s discontinuation of prospecting activities	Closure of the Imbasa prospecting right	Closure and rehabilitation

8.5 ASSESSMENT OF THE SIGNIFICANCE OF EACH IMPACT AND RISK AND AN INDICATION OF THE EXTENT OF TO WHICH THE ISSUE AND RISK CAN BE AVOIDED OR ADDRESSED BY THE ADOPTION OF MANAGEMENT ACTIONS

The assessment of the significance of potential impacts, including the extent to which impacts can be avoided or mitigated, is included in Section 9 and Appendix D.

9 ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK

A summary of the assessment of the biophysical and socio-economic impacts associated with the proposed project is provided in Table 9-1 below. A full description of the assessment is included in Appendix D.

TABLE 9-1: ASSESSMENT OF SIGNIFICANT IMPACTS AND RISKS

Activity	Potential impact	Aspects affected	Phase	Significance (Unmitigated)	Management actions type	Significance (Mitigated)	Extent to which the impact can be reversed, avoided or cause irreplaceable loss and the degree to which the impact and risk can be mitigated
Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Loss of flora and fauna through lack of or poor rehabilitation	Flora and Fauna	Closure and rehabilitation	Very Low	No additional mitigation or monitoring is required	Not Applicable	Can be avoided
Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Loss of pre-prospecting land uses through lack of or poor rehabilitation	Land-use	Closure and rehabilitation	Very Low	No additional mitigation or monitoring is required	Not Applicable	Can be avoided
Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Change in the visual landscape of the area	Visual	Closure and rehabilitation	Insignificant	No additional mitigation or monitoring is required	Not Applicable	Can be avoided
Closure of prospecting activities	Negative and positive socio-economic impacts	Socio-economic	Closure and rehabilitation	Very low	No additional mitigation or monitoring is required	Not Applicable	Can be avoided

10 SUMMARY OF SPECIALIST REPORT FINDINGS

Given the nature of the project, it was not deemed necessary to undertake any project specific specialist studies. This section is therefore not applicable.

11 ENVIRONMENTAL IMPACT STATEMENT

11.1 SUMMARY OF KEY FINDINGS

This section provides a summary of the findings of identified and assessed potential impacts on the receiving environment. Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr, therefore the assessment of the unmitigated scenario takes this into account. A summary of the potential impacts (as per Section 9) in the unmitigated scenario for the project is included in Table 11-1 below. Since no additional mitigation and monitoring is deemed necessary, the mitigated scenario is not applicable.

The assessment of the project presents the potential for limited/insignificant negative impacts to occur on the biophysical, social and socio-economic environments both within the prospecting right area and in the surrounding area.

TABLE 11-1: SUMMARY OF POTENTIAL IMPACTS

Aspect	Potential impact	Impact significance of the impact (the ratings are negative unless otherwise specified)	
		Unmitigated	Mitigated
Flora and Fauna	Loss of flora and fauna if through lack of or poor rehabilitation	Very Low	Not Applicable
Land Use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	Very Low	Not Applicable
Visual landscape	Change in the visual landscape of the area	Insignificant	Not Applicable
Socio-economic	Negative and positive socio-economic impacts resulting from Imbasa's cessation of prospecting activities.	Very low	Not Applicable

11.2 FINAL SITE MAP

The final preferred site layout plan showing the location of the closed drill sites is included in Figure 3.

11.3 SUMMARY OF THE POSITIVE AND NEGATIVE IMPACTS AND RISKS OF THE PROPOSED ACTIVITY AND IDENTIFIED ALTERNATIVES

With reference to Sections 7.1, no site layout or infrastructure locational alternatives were considered and as such this section is not applicable.

12 IMPACT MANAGEMENT OBJECTIVES AND OUTCOMES FOR INCLUSION IN THE EMPR

Based on the outcome of the impact assessment the proposed management objectives and outcomes specific to the proposed project and for inclusion into the environmental management programme are detailed in this section.

12.1 PROPOSED MANAGEMENT OBJECTIVES AND OUTCOMES FOR ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACTS

Specific environmental objectives to control, remedy or prevent potential impacts emanating from the proposed project are provided in Table 12-1 below.

TABLE 12-1: ENVIRONMENTAL OBJECTIVES AND OUTCOMES

Aspect	Environmental objective	Outcome
Flora and Fauna	To prevent the unacceptable loss of flora and fauna if any residual contamination exists and if re-vegetation isn't successful	Ensure that vegetation successfully re-establishes itself and no residual contamination remains on site.
Land use	To prevent loss of pre-mining land use if any residual contamination exists and if re-vegetation isn't successful.	Ensure that vegetation successfully re-establishes itself and no residual contamination remains on site, thus allowing pre-project land uses to continue.
Visual landscape	To limit negative visual scaring of the landscape.	Ensure that vegetation successfully re-establishes itself so as to limit scaring of the landscape.
Socio-economic	To limit negative socio-economic impacts and enhance positive economic impacts.	Ensure that socio-economic impacts are managed through suitable communication structures.

12.1.1 Impacts that require monitoring programmes

No impacts require any further monitoring; refer to Section 28 and Appendix D.

12.1.2 Activities and infrastructure

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr. No activities or infrastructure are applicable to the closure of the prospecting right.

12.1.3 Management actions

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr. No additional mitigation is required (see Section 26).

12.1.4 Roles and responsibilities

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr. No additional roles and responsibilities are required

13 ASPECTS FOR INCLUSION AS CONDITIONS OF THE AUTHORISATION

With reference to Regulation 26 of GNR 982 of NEMA, additional conditions that should form part of the environmental authorisation that are not specifically included in the EMPr report include compliance with all applicable environmental legislation whether specifically mentioned in this document or not and which may be amended from time to time.

14 ASSUMPTIONS, UNCERTAINTIES, LIMITATIONS AND GAPS IN KNOWLEDGE

This BAR 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.

14.1 ENVIRONMENTAL ASSESSMENT LIMIT

The limits that have informed the environmental assessment are as follows:

- The BAR 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; and
- This BAR 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 REASONED OPINION AS TO WHETHER THE PROPOSED ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED

15.1 REASONS WHY THE ACTIVITY SHOULD BE AUTHORIZED OR NOT

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

15.2 CONDITIONS THAT MUST BE INCLUDED IN THE AUTHORISATION

15.2.1 Specific conditions for inclusion in the EMPr

Refer to Section 13.

15.2.2 Rehabilitation requirements

Refer to Section 27.

16 PERIOD FOR WHICH AUTHORISATION IS REQUIRED

Imbasa has already decommissioned the drill sites within its Imbasa prospecting right area. The environmental authorisation is required in support of the closure of this prospecting right.

17 UNDERTAKING

We, Reinett Mogotshi/Caitlin Hird, the Environmental Assessment Practitioners responsible for compiling this EMPr, 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

18 FINANCIAL PROVISION

18.1 METHOD TO DERIVE THE FINANCIAL PROVISION

The closure cost liability was calculated as per the methodology of the DMRE guideline document of January 2005.

The amount determined for financial provision for the project is provided in Section 27.

18.2 CONFIRM THAT THE AMOUNT CAN BE PROVIDED FOR FROM OPERATING EXPENDITURE

No additional mitigation or monitoring is deemed necessary. This section is therefore not applicable.

19 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

19.1 IMPACT ON THE SOCIO-ECONOMIC CONDITIONS OF ANY DIRECTLY AFFECTED PERSON

The impacts associated with socio-economic conditions are discussed in Appendix D.

Direct socio-economic impacts include:

- Loss of social and economic benefits (to contractor) by not continuing with the prospecting, but it is assumed that the contractor would find contracts elsewhere; and
- Potential social and economic benefits as a result of resource becoming available for other potential prospectors.

Indirect socio-economic impacts include:

- Loss of pre-prospecting land uses and related livelihoods through lack of or poor rehabilitation.

The assessment of the project indicates that the potential for negative residual socio-economic impacts/risks is very low.

19.2 IMPACT ON ANY NATIONAL ESTATE REFERRED TO IN SECTION 3(2) OF THE NATIONAL HERITAGE RESOURCES ACT

Not applicable. No national estate will be affected as part of the project.

20 OTHER MATTERS REQUIRED IN TERMS OF SECTIONS 24(4)(A) AND (B) OF THE ACT

No other matters are required in terms of Section 24(4)(A) and (B) of the Act.

PART B - ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN

21 DETAILS OF THE EAP

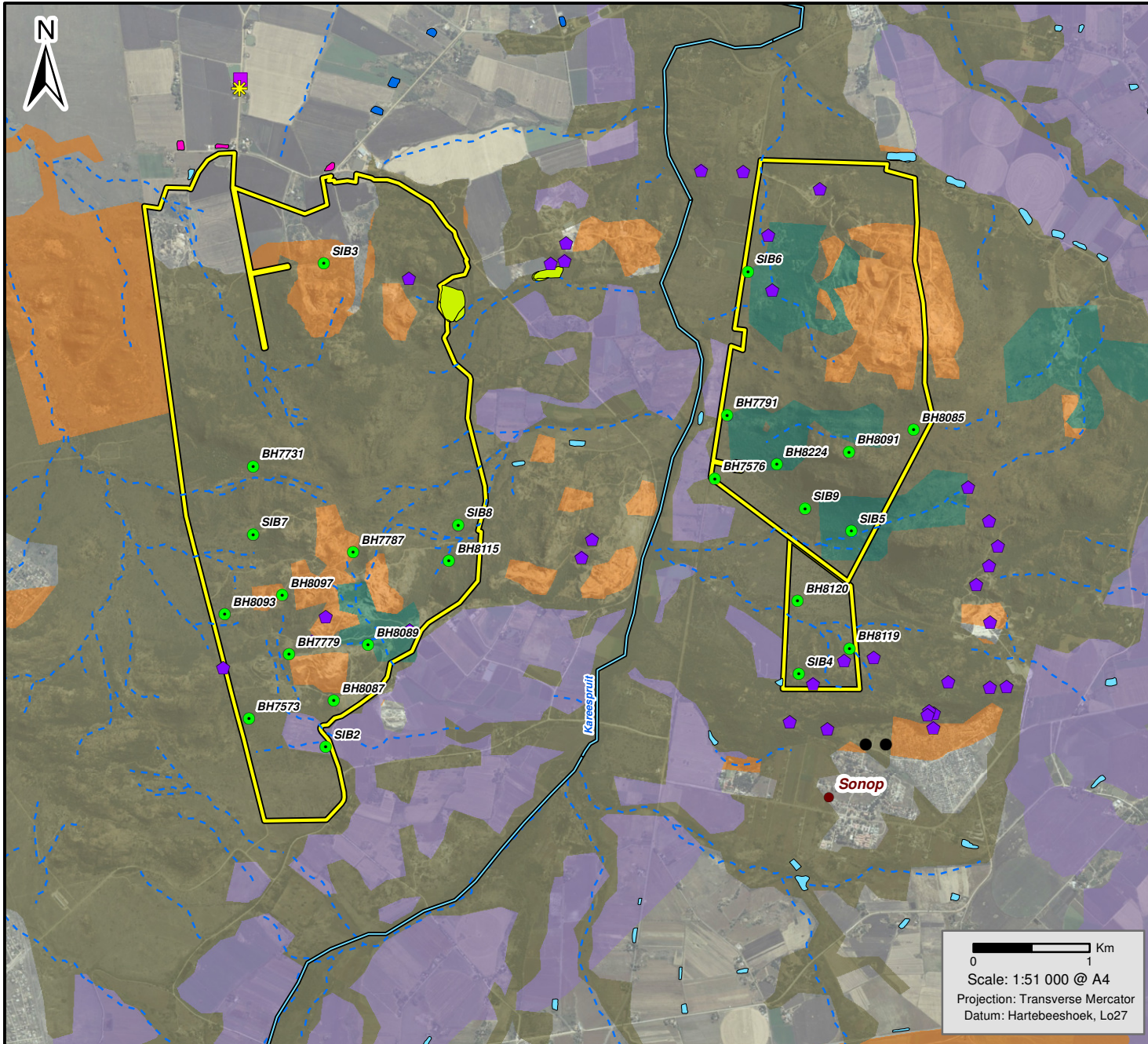
The details of the EAPs who undertook the EIA process and prepared this EMPr and Closure Plan are provided in Part A, Section 1.

22 DESCRIPTION OF THE ASPECTS OF THE ACTIVITY

The activities that are covered in the EMPr and Closure Plan are included in Part A, Section 3.

23 COMPOSITE MAP

A composite map superimposing the proposed activity over the environmental sensitivities of the Imbasa prospecting right area is included in Figure 6 below.



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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24 DESCRIPTION OF THE IMPACT MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENT

24.1 DETERMINATION OF CLOSURE OBJECTIVES

The closure objectives for the project were developed against the local environmental and socio-economic context of the prospecting project (see Section 7.4), as well as, regulatory requirements (see Section 4) and perceived stakeholder expectations (see Section 7.2). Further information pertaining to the closure objectives identified for the project is provided in Section 27.1.1.

24.2 PROCESS FOR MANAGING ANY ENVIRONMENTAL DAMAGE, POLLUTION OR ECOLOGICAL DEGRADATION AS A RESULT OF UNDERTAKING A LISTED ACTIVITY

No additional mitigation or monitoring is deemed necessary. This section is therefore not applicable.

24.3 POTENTIAL RISK OF ACID MINE DRAINAGE

Acid Mine Drainage is not a risk associated with prospecting activities and therefore has not been considered further in this report.

24.4 VOLUMES AND RATE OF WATER USE FOR MINING

No water will be used and therefore this section is not applicable.

24.5 HAS A WATER USE LICENCE BEEN APPLIED FOR?

No water uses are triggered by the closure of the Imbasa prospecting right and therefore a water use license application is not applicable.

24.6 IMPACTS TO BE MITIGATED IN THEIR RESPECTIVE PHASES

The assessment of potential impacts is included in Section 9 and Appendix D. No additional mitigation is required. This section is therefore not applicable.

25 IMPACT MANAGEMENT OUTCOMES

No additional mitigation is required. This section is therefore not applicable.

26 IMPACT MANAGEMENT ACTIONS

No additional mitigation is required. This section is therefore not applicable.

27 FINANCIAL PROVISION

27.1 DETERMINATION OF THE AMOUNT OF THE FINANCIAL PROVISION

27.1.1 Closure objectives description and the alignment with the baseline environment

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.

27.1.2 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 7.2 for further details).

Comments received from I&APs have been summarised in Section 7.3 and included in full in Appendix C of this report.

27.1.3 Regulatory requirements and conditions for closure

The regulatory requirements for closure are included in Section 4.

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.

27.1.4 Rehabilitation plan

Rehabilitation of the prospecting sites has been undertaken as outlined in Section 3.2. In accordance with the NEMA Closure Plan requirements (Appendix 5 1(i)) of the EIA Regulations), a plan showing the area under closure including the final and future land use is presented in Figure 4.

27.1.5 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.

27.1.6 Calculate and state the 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 Minerals and Energy (DME), 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.

27.1.7 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 27.1.6 above).

28 MECHANISMS FOR MONITORING COMPLIANCE AND PERFORMANCE AGAINST THE EMPR

Monitoring of compliance and performance against the EMPr was done through bi-annual performance assessments of the prospecting activities which were submitted to the DMRE. This report presents the findings of the final performance assessment / environmental audit and therefore no further performance assessments/ environmental audits are deemed necessary.

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.

29 FREQUENCY OF SUBMISSION OF PERFORMANCE ASSESSMENT REPORT

Given that this report is in support of an application for the closure of the Imbasa prospecting right, this is not applicable.

30 ENVIRONMENTAL AWARENESS PLAN

Given that this report is in support of an application for the closure of the Imbasa prospecting right, an environmental awareness plan is not deemed necessary.

31 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

Given that this report is in support of an application for the closure of the Imbasa prospecting right, no further information is expected to be required by the competent authority. However, should the competent authority request additional information this will be provided.

32 UNDERTAKING


We, Reinett Mogotshi/Caitlin Hird, the Environmental Assessment Practitioners responsible for compiling this EMPr, 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

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33 REFERENCES

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