



## mineral resources

Department:  
Mineral Resources  
**REPUBLIC OF SOUTH AFRICA**

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

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### IMPORTANT NOTICE

**Kindly note that:**

1. As from 8 December 2014, this document serves as the application form, and incorporates the requisite documents that are to be submitted together with the application for the necessary environmental authorisations in terms of the said Acts.
2. This application form is applicable while the Mineral and Petroleum Resources Development Amendment Act of 2008 is in effect, as the form may require amendment should the Act be further amended.
3. Applicants are required to apply for the necessary water use licence and any other authorisations nor licences to the relevant competent authorities as required by the relevant legislation. Upon acceptance of an application for a right or permit in terms of the MPRDA, applicants will be required to provide evidence to the Regional Manager that a water use licence has been applied for.
4. The Regional Manager will respond to the application and provide the reference and correspondence details of the Competent Authority, and in the event that the application for a right or permit is accepted, together with the date by which the relevant environmental reports must be submitted. Notwithstanding anything that may appear to be stated to the contrary in the acceptance letter, the timeframes are in fact aligned and the prescribed timeframes for the submission of documents as regulated by the NEMA regulations must be strictly adhered to.
5. The application must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.
6. The failure to submit complete information as required in this application form may result in the refusal of the application for an environmental authorisation and consequently of the right or permit applied for.
7. This application must be submitted through the SAMRAD online application system of the Department of Mineral Resources under "Other documents to upload".
8. Unless protected by law, all information filled in on this application form will become public information on receipt by the competent authority. Any interested and affected party should and shall be provided with the information contained in this application on request, during any stage of the application process.
9. Please note that an application fee is payable in terms of the National Environmental Management Act and the National Waste Management Act, which fees must be paid upon lodgement of the application. Should the said application fees not be paid as prescribed the application for a right or permit in terms of the Mineral and Petroleum Resources Development Act cannot be considered to have been made in the prescribed manner and the said application for a right or permit will have to be rejected. In this regard the type of applications must be identified in the table below.

PLEASE STATE TYPE OF AUTHORISATIONS BEING APPLIED FOR. APPLICATION TYPE	APPLICABLE FEE an X	Mark with where applicabl e
NEMA S&EIR application on its own	R10 000.00	<input type="checkbox"/>
NEMA BAR application on its own	R 2 000.00	<input type="checkbox"/>
NEMWA S&EIR application on its own	R10 000.00	<input type="checkbox"/>
NEMWA BAR application on its own	R 2 000.00	<input type="checkbox"/>
NEMA S&EIR application combined with NEMWA S&EIR application	R 15 000.00	<input checked="" type="checkbox"/>
NEMA BAR application combined with NEMWA BAR application	R 3 000.00	<input type="checkbox"/>
NEMA S&EIR application combined with NEMWA BAR application	R 11 000.00	<input type="checkbox"/>

### 1. CONSULTATION BASIC ASSESSMENT AND/ OR SCOPING REPORT

### 2. DETAILS OF THE APPLICANT

Project applicant:	MBG MINING AND INDUSTRIAL SUPPLIERS (PTY) LTD		
Registration no (if any):	2011/112327/07		
Trading name (if any):	N/A		
Responsible Person, (e.g. Director, CEO, etc.):	Director		
Contact person:	Gabisile Buhali		
Physical address: Postal address:	2 Gladiola Street, Deljudor Ext 10, Emalahleni		
	1035	Cell:	078 099 5509
Postal code:	078 146 1436	Fax:	086 5144 103
Telephone:	ettie189@gmail.com		
E-mail:			

### 3. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

EAP:	Ndinanyi Kenneth Singo		
Professional affiliation/registration:	SACNASP -400069/16		
Contact person (if different from EAP):	Ndinanyi Kenneth Singo		
Company:	SINGO CONSULTING (PTY) LTD		
Physical address:	Office 16, Corridor Hill Crossing Office Park, Witbank, 1035		
Postal address:	P/BAG X7297, SUITE 87, WITBANK		
Postal code:	1035	Cell:	078 2727 839
Telephone:	013 692 0041	Fax:	086 5144 103
E-mail:	<a href="mailto:kenneth@singoconsulting.co.za">kenneth@singoconsulting.co.za</a> ; <a href="mailto:admin@singoconsulting.co.za">admin@singoconsulting.co.za</a>		

If an EAP has not been appointed please ensure that an independent EAP is appointed as stipulated by the NEMA Regulations, prior to the commencement of the process.

The declaration of independence and the Curriculum Vitae (indicating the experience with environmental impact assessment and relevant application processes) of the EAP must also be attached as **Appendix 1. CV OF EAP IS ATTACHED**

4. PROJECT DESCRIPTION

<b>Farm Name:</b>	Portion 09 of the farm Naudesbank 172 IS
<b>Application area (Ha)</b>	179.534ha
<b>Magisterial district:</b>	Magisterial District: Carolina, Mpumalanga Province
<b>Distance and direction from nearest town</b>	Approximately 16.36 km west of Carolina and 24.74 km North East of Hendrina
<b>21 digit Surveyor General Code for each farm portion</b>	TOIS00000000017200009
<b>Locality map</b>	See below
<b>Description of the overall activity.</b> (Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaissance permit, Technical co-operation permit, Additional listed activity)	<p>Mining Right application</p> <p>Description of Mining Method and Process</p> <p>The mining method will be a standard truck and shovel application where the topsoil is removed and stored. Thereafter; softs will be removed and stored at the designated material stockpiles. Drilling and blasting of the hard materials (hards) will then take place. Following the blasting process, material will be dozed into the void following the coaling operation. A conservative estimate of 15 % dozer gain has been in the calculations.</p> <p>The remainder of the hard material will be loaded, trucked out of the pit, and dumped over the highwall into the void created by the mining operation. Coaling will then commence, and the process repeated on a strip-by-strip basis. Material (apart from the topsoil) will then be rolled-over into the void created by the removal of the coal in the previous bench, with the hard overburden and interburden forming the base. This is followed by the soft overburden, levelled, and finally topsoil will be placed and seeded.</p> <p>Initially, topsoil and hards will be placed in dedicated positions in the centre, just north of the Block OC1, as close as possible to the final void positions, in order to eliminate excessive handling during the closure phase of the mine. Rollover of overburden material will be implemented after the first strip has been mined. Rehabilitation will form an integral part of the mining process and final rehabilitated land will not be further than four mining strips behind the mining face.</p> <p>Drilling and blasting activities will be required for hard material. Waste material will be handled by excavators and small-articulated trucks, as well as dozers. Where practical, throw blasting will be utilised to minimise loading and hauling requirements of hard material. Blast gain is entirely dependent on the competency of the overburden. Where the overburden consists mainly of soft material, throw blast gain is minimal. When it is classified as competent overburden, throw blast gain increases to as much as 20 % of the blasted material. Approximately 15 % of the overburden will be moved by dozer-push method to the waste side of the pit.</p> <p>Establishing the backfill dumps as quickly as possible will minimise haul distances and ensure the waste fleets are kept to a minimum. Mine planning will sequence waste drilling, blasting, and removal to provide a continuous source of coal from the respective coal seams for beneficiation purposes.</p>

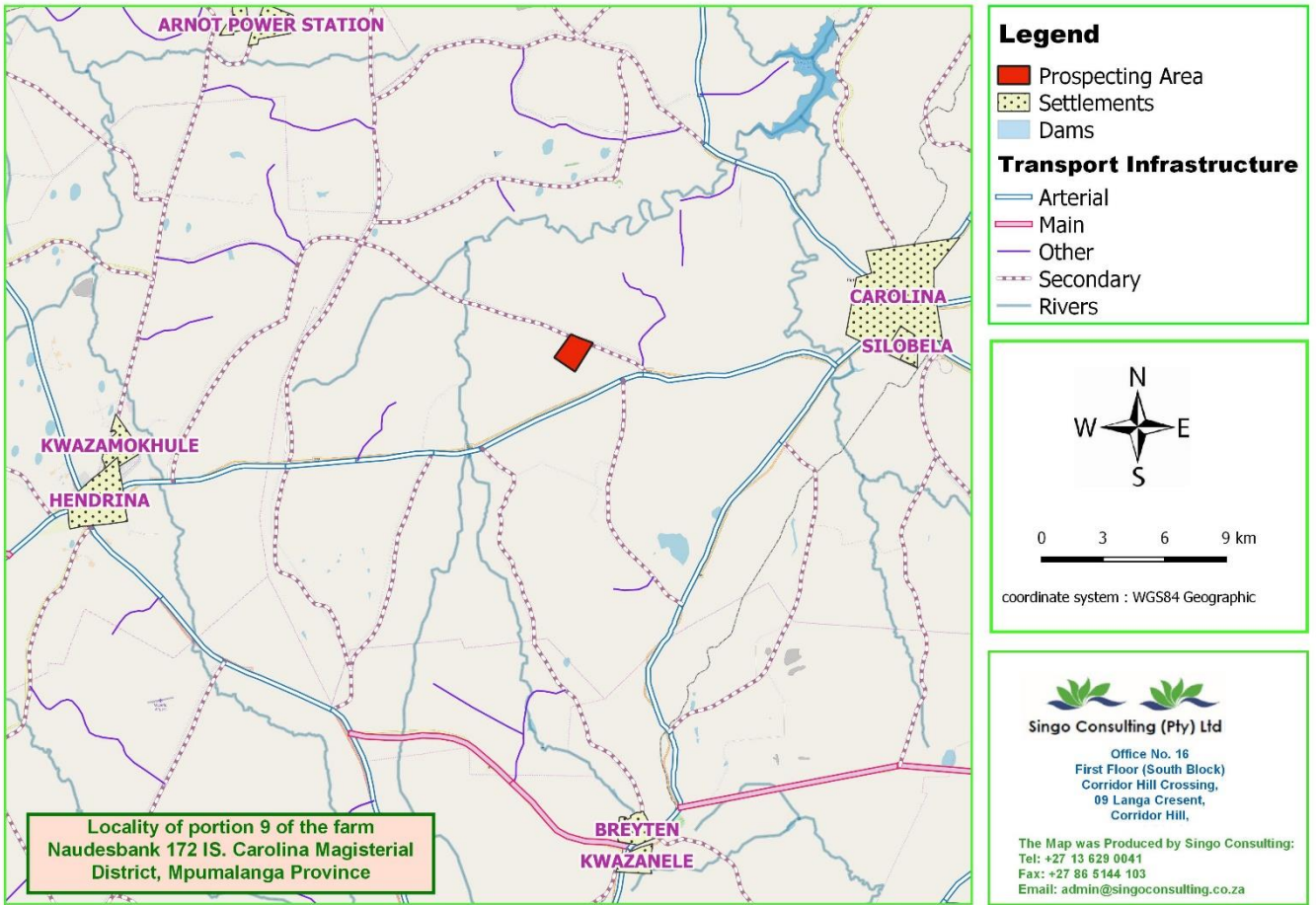


Figure 1: General Project Locality

## 5. ACTIVITIES TO BE AUTHORISED

(Please provide copies of Environmental Authorisations obtained for the same property as **Appendix**). N/A

(For an application for authorisation icated. Pleathat involves more than one listed activity that, together, make up one development proposal, all the listed activities pertaining to this application must be indse note that any authorisation that may result from this application will only cover activities specifically applied for).(Attach a proposed site plan, drawn to a scale acceptable to the competent Authority, showing the location of all the activities to be applied for, as **Appendix** N/A

Table 1: Listed activities according to NEMA requiring environmental authorization.

Government Notice	Activity Number	Description
<b>Listing Notice 1: R.324 on 7 April 2017</b>	9	The development of infrastructure exceeding 1 000 meters in length for the bulk transportation of water or storm water— (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more; excluding where— <b>(a)</b> such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or <b>(b)</b> where such development will occur within an urban area.
	10	The development of infrastructure exceeding 1000 metres in length for the bulk transportation of water or storm water- (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more <b>The internal reticulation of water still needs to be finalised</b>
	12	The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse <b>This will be confirmed during the EIA phase.</b>
	13	The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more <b>Pollution Control Dams</b>
	14	The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a

		combined capacity of 80 cubic metres or more but not exceeding 500 cubic metre <b>Storage of diesel and other hydrochemicals</b>
	19	The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse <b>Mining activities associated with the physical mining activities, construction of wetland and stream crossing or any other related mining activities that trigger this activity – will be confirmed during the EIA phase</b>
	24	The development of a road— (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres <b>Construction of mining road infrastructure which will include service, access and haul roads as part of the proposed mining activities</b>
	25	The development and related operation of facilities or infrastructure for the treatment of effluent, wastewater or sewage with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres <b>Pollution control dams – confirm during the EIA phase</b>
	28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;
	31	The decommissioning of existing facilities, structures or infrastructure for—

		<p>(i) any development and related operation activity or activities listed in this Notice,</p> <p>Listing Notice 2 of 2014 or Listing Notice 3 of 2014</p> <p><b>This will be applicable for existing infrastructure on the properties – will be confirmed during the EIA phase</b></p>
	56	<p>The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</p> <p>(i) where the existing reserve is wider than 13,5 meters; or</p> <p>(ii) where no reserve exists, where the existing road is wider than 8 metres;</p> <p><b>Upgrades to existing roads – to be confirmed during the EIA process</b></p>
<b>Listing Notice 2: R.325 on 7 April 2017</b>	4	<p>The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres.</p> <p><b>Storage of diesel and other hydrocarbons – will be confirmed during the EIA phase</b></p>
	6	<p>The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent</p> <p><b>Pollution control dams – will be confirmed during the EIA phase</b></p>
	15	<p>The clearance of an area of 20 hectares or more of indigenous vegetation</p> <p><b>Needs to be confirmed from the ecological assessment</b></p>
	17	<p>Any activity including the operation of that activity which requires a mining right as contemplated in section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including—</p> <p>(a) associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource; or</p> <p>(b) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing but excluding the secondary processing of a mineral resource, including the smelting,</p>

		beneficiation, reduction, refining, calcining or gasification of the mineral resource in which case activity 6 in this Notice applies.
	19	The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— a) NA; or b) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing <b>Relates to the coal crushing, screening and washing of coal on site</b>
	24	The extraction or removal of peat or peat soils, including the disturbance of vegetation or soils in anticipation of the extraction or removal of peat or peat soils, but excluding where such extraction or removal is for the rehabilitation of wetlands in accordance with a maintenance management plan. <b>Needs to be confirmed by soil capability study and wetland specialist</b>
<b>Listing Notice 3: R.327 on 7 April 2017</b>	4	Mpumalanga i. Outside urban areas: <b>(aa)</b> A protected area identified in terms of NEMPAA, excluding disturbed areas; <b>(bb)</b> National Protected Area Expansion Strategy Focus areas; <b>(cc)</b> Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; <b>(dd)</b> Sites or areas identified in terms of an international convention; <b>(ee)</b> Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; <b>(ff)</b> Core areas in biosphere reserves; or <b>(gg)</b> Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, excluding disturbed areas, where such areas comprise indigenous vegetation; or ii. Inside urban areas: <b>(aa)</b> Areas zoned for use as public open space; or <b>(bb)</b> Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority or zoned for a conservation purpose.
	10	Mpumalanga i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion



		<p>Strategy Focus areas; (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (dd) Sites or areas identified in terms of an international convention; (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (ff) Core areas in biosphere reserves; (gg) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve, where such areas comprise indigenous vegetation; or (hh) Areas within a watercourse or wetland, or within 100 metres of a watercourse or wetland; or ii. Inside urban areas: (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority or zoned for a conservation purpose.</p>
	12	<p>Mpumalanga i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; or iii. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning or proclamation in terms of NEMPAA.</p>
	14	<p>Mpumalanga i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas identified in terms of an international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve, where such areas comprise indigenous</p>

		vegetation; or ii. Inside urban areas: (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, zoned for a conservation purpose.
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Table 2: Waste Management listed activities according to NEM: WA requiring environmental authorisation

Government Notice	Activity	Description
<b>R.921</b> <b>Category A</b>	7	The treatment of hazardous waste using any form of treatment at a facility that has the capacity to process in excess of 10 tons but less than 100 tons
	12	The construction of a facility for a waste management activity listed in Category A of this Schedule
<b>R.921</b> <b>Category B</b>	1	The storage of hazardous waste in lagoons excluding storage of effluent, wastewater or sewage
	7	The disposal of any quantity of hazardous waste to land.
	10	The construction of a facility for a waste management activity listed in Category B of this Schedule
<b>R.633:</b> <b>Category B</b>	11	The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a mining right, exploration right or production right in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002).
<b>R.921</b> <b>Category C</b>	2	The storage of hazardous waste at a facility that has the capacity to store in excess of 80m <sup>3</sup> of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste

Table 3: Water uses according to NWA requiring environmental authorisation

Section 21 Water use	Description
21 (a)	Abstraction of water
21 (b)	Storage of water
21 (c)	Impeding or diverting the flow of water in a watercourse
21 (f)	Discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit

21 (g)	Disposing of waste in a manner which may detrimentally impact on a water resource
21 (i)	Altering the bed, banks, course or characteristics of a watercourse
21 (j)	Removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people

**6. PUBLIC PARTICIPATION**

(Provide details of the public participation process proposed for the application as required by Regulation.

**Details of the Public Participation process to be followed.**

**6.1.1. IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES TO BE CONSULTED**

IDENTIFICATION CRITERIA	Mark with an X where applicable	
	YES	NO
Will the landowner be specifically consulted?	X	
Will the lawful occupier on the property other than the Landowner be consulted?	X	
Will a tribal authority or host community that may be affected be consulted?	X	
Will recipients of land claims in respect of the area be consulted?	X	
Will the landowners or lawful occupiers of neighbouring properties have been identified?	X	
Will the local municipality be consulted?	X	
Will the Authority responsible for power lines within 100 metres of the area be consulted?	X	
Will Authorities responsible for public roads or railway lines within 100 metres of the area applied for be consulted?	X	
Will authorities responsible for any other infrastructure within 100 metres of the area applied for be consulted? (Specify)	X	
Will the Provincial Department responsible for the environment be consulted?	X	
Will all of the parties identified above be provided with a description of the proposed mining /prospecting operation as referred above?	X	
Will all the parties identified above be requested in writing to provide information as to how their interests (whether it be socio-economic, cultural, heritage or environmental) will be affected by the proposed mining project?	X	
Other, Specify	N/A	

**6.1.2. DETAILS OF THE ENGAGEMENT PROCESS TO BE FOLLOWED**

<p><b>Steps to be taken to notify interested and affected parties</b> (Describe the process to be undertaken to consult interested and affected parties including public meetings and one on one consultations. NB the affected parties must be specifically consulted regardless of whether or not they attended public meetings. Photographs of notice boards, and copies of advertisements and notices notifying potentially interested and affected parties of the proposed application must be attached as <b>Appendix</b>)</p>	<p><b>PROVIDE DESCRIPTION HERE</b></p> <p>Public Participation Process to be undertaken:</p> <ul style="list-style-type: none"> <li>• Advertise in local newspaper or Gazette and onsite;</li> <li>• Give notice, in writing, of the proposed application to any organ of state which has jurisdiction in respect of any aspect of the activity;</li> <li>• Open and maintain a register of all interested and affected parties in respect of the application;</li> <li>• Consider all objections and representation received from I&amp;APs;</li> <li>• Give all registered I&amp;APs an opportunity to comment on the draft BAR; * Public participation meeting/s will be held where all I&amp;APs will be given an opportunity to discuss the draft reports, review same and comment. * Focus group meetings will be held with certain target groups or individual parties where necessary.</li> </ul> <p>* I&amp;APs will be afforded further opportunities to comment on the project before submission to authorities for Record of Decision.</p>
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<b>Information to be provided to Interested and Affected Parties.</b>	<p><b>Compulsory</b></p> <ul style="list-style-type: none"> <li>❖ The site plan.</li> <li>❖ List of activities to be authorised</li> <li>❖ Scale and extent of activities to be authorised</li> <li>❖ Typical impacts of activities to be authorised (e.g. surface disturbance, dust, noise, drainage, fly rock etc.)</li> <li>❖ The duration of the activity.</li> <li>❖ Sufficient detail of the intended operation to enable them to assess what impact the activities will have on them or on the use of their land)</li> </ul> <p><b>Other, specify:</b> Background Information Document, Scoping and EIA report, Specialist studies</p>
<b>Information to be required from Interested and Affected Parties.</b>	<p><b>Compulsory</b></p> <ul style="list-style-type: none"> <li>❖ To provide information on how they consider that the proposed activities will impact on them or their socio-economic conditions</li> <li>❖ To provide written responses stating their suggestions to mitigate the anticipated impacts of each activity</li> <li>❖ To provide information on current land uses and their location within the area under consideration</li> <li>❖ To provide information on the location of environmental features on site to make proposals as to how and to what standard the impacts on site can be remedied. requested to make written proposals</li> <li>❖ To mitigate the potential impacts on their socio-economic conditions to make proposals as to how the potential impacts on their infrastructure can be managed, avoided or remedied).</li> </ul> <p><b>Other, Specify</b> Questionnaire on potential/perceived environmental, cultural and socio-economic impacts</p>

## 7. Description of the assessment process to be undertaken

ITEM	DESCRIPTION
<b>Environmental attributes.</b> Describe how the Environmental attributes associated with the development footprint will be determined.	Baseline environmental information identification Specialist Studies (where applicable) Site inspections Literature review (existing information/records and existing databases from government and other information resources agencies) Interviews with local inhabitants and landowners Feedback during Public Participation Process
<b>Identification of impacts and risks.</b> (Describe the process that will be used to identify impacts and risks.	<ol style="list-style-type: none"> <li>1. Conduct Screening Level Environmental Impact / Risk Assessment:             <ol style="list-style-type: none"> <li>1.1 Identification of Possible Environmental Impacts and Risks</li> <li>1.2 Process and Input</li> <li>1.3 Ranking of Impacts and Risks</li> </ol> </li> <li>2. Conduct Second Level Impact / Risk Assessment:             <ol style="list-style-type: none"> <li>2.1 Sampling, Data Collection and Monitoring</li> <li>2.2 Assumptions and Measurements</li> <li>2.3 Quantitative Risk Assessment</li> </ol> </li> <li>3 Determine Acceptability of Impacts and Risks             <ol style="list-style-type: none"> <li>3.1. Acceptable Risks with no Mitigation</li> </ol> </li> <li>4 Re-evaluation of Uncertain Impacts / Risk:             <ol style="list-style-type: none"> <li>4.1. Potential Significant Risks</li> <li>4.2. Insignificant Risks</li> </ol> </li> <li>5 Determine Status of Insignificant Impacts / Risks:             <ol style="list-style-type: none"> <li>5.1. Status of Insignificant Risks:</li> </ol> </li> <li>6 Alternative Risk Prevention and Management Strategies</li> </ol>

<p><b>Consideration of alternatives.</b> Describe how alternatives, and in particular the alternatives to the proposed site layout and possible alternative methods or technology to be applied will be determined.</p>	<p>Alternatives to be considered:</p> <ol style="list-style-type: none"> <li>1. Site selection (for infrastructure, contractors camp and boreholes)</li> <li>2. Mining Methods (e.g. open cast mining, winning)</li> <li>3. Mineral Analysis Methods</li> <li>4. Equipment, Transport, Power and Water Supply</li> <li>5. No-go option</li> </ol>
<p><b>Process to assess and rank impacts.</b> Describe the process to be undertaken to identify, assess and rank the impacts and risks each individual activity.</p>	<p>The assessment procedure will make use of:  Predictive methods: the magnitude of the impact will be predicted.  Evaluation methods: the significance of the impacts will be assessed</p> <p><b>TIMING</b>  Immediate  Construction/operation  Rehabilitation</p> <p><b>DURATION</b>  Short term = 0-6 months</p> <p><b>EXTENT</b>  On-site  Local = 0-40 km radius  District, Regional, National</p> <p><b>PROBABILITY</b>  Definite: 100% probability of occurrence  High: 99-50% probability of occurrence  Moderate: 49-15% of occurrence  Low:&lt;15% probability of occurrence</p> <p><b>INTENSITY/SEVERITY</b></p>

	<p>High: 100-50% degree of change in area of direct effect/impact  Medium: 50-15% change in the area of effect  Low:&lt;15% change in area of effect</p> <p>DETERMINATION OF IMPACT SIGNIFICANCE WILL ENTAIL THE FOLLOWING:</p> <p>The significance of the unmanaged and managed impacts will be assessed through consideration of the probability of the impact occurring, the extent over which the impact will be experienced, and the intensity/severity of the impacts, as follows:</p> <p>1. Negligible:  * the impact is non-existent or insubstantial, is of no or little importance to any stakeholders and can be ignored.</p> <p>2. Low:  * the impact is limited in extent, has low to medium intensity; whatever its probability of occurrence is, the impact will not have a material effect on the decision and is unlikely to require management intervention carrying significant costs.</p> <p>3. Moderate:  * the impact is of importance to one or more stakeholders, and its intensity will be medium or high; therefore, the impact may materially affect the decision, and management intervention will be required.</p> <p>4. High:  * the impact could render development options controversial or the entire project unacceptable if it cannot be reduced to acceptable levels, and/or the cost of management intervention will be a significant factor in project decision-making.</p>
<p><b>Contribution of specialist reports</b>  Describe how specialist reports, if required, will be taken into consideration and inform the impact identification, assessment and remediation process.</p>	<p>Specific specialist studies are identified and if required the following considerations are made: In order to assess the environmental, social and cultural impacts of the proposed project, a number of specialist studies may be commissioned. The findings of these studies will be incorporated into the BAR or Environmental Impact Assessment Report (EIR). The specialist studies consider the proposed structure and activities of the operations, as well as the associated risks to the receiving physical and socio-cultural environment.</p> <p>The following aspects of the biophysical environment will be considered in the baseline studies:</p> <ul style="list-style-type: none"> <li>❖ Surface Water;</li> <li>❖ Groundwater;</li> <li>❖ Vegetation and Fauna;</li> <li>❖ Heritage and Archaeology;</li> <li>❖ Traffic;</li> <li>❖ Soil;</li> <li>❖ Land Use;</li> <li>❖ Visual Aspects.</li> </ul>

**Determination of impact management objectives and outcomes.**

Describe how impact management objectives will be determined for each activity to address the potential impact at source, and how the impact management outcomes will be aligned with standards.

- Objectives for management of environmental impacts
- Objectives for socio economic conditions
- Objective for historical and cultural aspects
- Objectives for Closure

- \* Describe the pre-mining environment as informed by the description of the baseline socioeconomic environment
- \* Identify the measures required to contain or remedy any causes of pollution or degradation or the migration of pollutants

- Identify Activities
- Identify aspects and impacts
- Identify Management / Mitigation Measures
- Determine closure objectives
- Develop implementation plan
- Identify environmental costs

List those management activities which, where applicable, will be conducted daily, weekly, monthly, quarterly, annually or periodically as the case may be in order to control any action, activity or process which causes pollution or environmental degradation. Define the roles and responsibilities for the execution of the monitoring and management programmes.

**8. OTHER AUTHORISATIONS REQUIRED**

LEGISLATION	Mark with an X where applicable			
	AUTHORISATION REQUIRED		APPLICATION SUBMITTED	
	YES	NO	YES	NO
<b>SEMA</b> s				
National Environmental Management: Air Quality Act		X	X	
National Environmental Management: Biodiversity Act		X	X	
National Environmental Management: Integrated Coastal Management Act		X	X	
National Environmental Management: Protected Areas Act		X	X	
National Environmental Management: Waste Act	X		X	
<b>National legislation</b>				
Mineral Petroleum Development Resources Act	X			
National Water Act	X			X
National Heritage Resources Act		X		
Others: Please specify		X		

Please provide proof of submission of applications in **Appendix**.

\*A water use license will be applied for, consultation with DWS is ongoing. Proof of application will be submitted to DMR.

In the event that an authorization in terms of the National Environmental Waste Management Act is required for any of the activities applied for please state so clearly in order for such an authorisation to be considered as part of this application.

N/A

## 9. DRAFT EMPr

For consultation purposes, provide a high-level approach to the management of the potential environmental impacts of each of the activities applied for.

<b>ACTIVITIES</b>  (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining,- excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	<b>PHASE</b> (of operation in which activity will take place).  State; Planning and design, Pre-Construction' Construction, Operational, Rehabilitation, Closure, Post closure.	<b>SIZE AND SCALE</b> (of Disturbance)  (volumes, tonnages and hectares or m <sup>2</sup> )	<b>TYPICAL MITIGATION MEASURES</b>  (Eg, storm water control, dust control, noise control, access control, rehabilitation etc...., etc....)	<b>COMPLIANCE WITH STANDARDS</b>  (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)
<b>Site preparation</b> Bush clearing, infrastructure, establishing construction area	Construction Operation Decommissioning	179.534ha	<ul style="list-style-type: none"> <li>•Dust suppression</li> <li>•Speed limits</li> <li>• Service equipment regularly</li> </ul>	NEMA Air Quality Act  Mine Health & Safety Act Biodiversity Act
<b>Earthworks</b> (for all infrastructure)	Construction Operation Decommissioning	2ha	<ul style="list-style-type: none"> <li>• Dust Control</li> <li>• Concurrent rehabilitation</li> <li>• Access control</li> </ul>	Procedures for Managing Significant Impacts Related to Mining.

				NEMA Air Quality Act Mine Health & Safety Act
<b>Civil works</b> Building activities, erection of structures, concrete work, steel work, electrical installation, establishing pipelines	Construction Operation Decommissioning	179.534 ha	Concurrent rehabilitation	Procedures for Managing Significant Impacts Related to Mining. NEMA Air Quality Act Mine Health & Safety Act
<b>Open pit mining</b> excavating, load, hauling, dewatering	Construction Operation	179.534 ha	<ul style="list-style-type: none"> <li>• Concurrent rehabilitation</li> <li>• EMPr mitigation measures</li> <li>• Dust, Air and water quality monitoring</li> </ul>	Procedures for Managing Significant Impacts Related to Mining. NEMA Air Quality Act Mine Health & Safety Act
<b>Mineral processing</b> Washing and screening plant	Construction Operation Decommissioning	0.5ha	<ul style="list-style-type: none"> <li>• Concurrent rehabilitation</li> <li>• Water monitoring</li> </ul>	Procedures for Managing Significant Impacts Related to Mining. NEMA Air Quality Act Mine Health & Safety Act NWA



<b>Waste rock management</b> Storage, final disposal	Operation Decommissioning Closure (final land form)	10ha	<ul style="list-style-type: none"> <li>• Concurrent rehabilitation</li> <li>• EMPr mitigation measures</li> <li>• Dust, Air and water quality monitoring</li> </ul>	Procedures for Managing Significant Impacts Related to Mining. NEMA Air Quality Act Mine Health & Safety Act
<b>Power supply and use</b> Internal site distribution	Construction Operation Decommissioning	5ha	Reduced electricity usage Use natural light and solar where possible	EMPr recommendations
<b>Water supply and use</b> Delivery on site, storage of clean water	Construction Operation Decommissioning	10ha	Water quality monitoring	National Water Act
<b>Dirty water management</b> Collection, storage of dirty water for re-use, recycling	Construction Operation Decommissioning	10ha	<ul style="list-style-type: none"> <li>• Waste management</li> <li>• Water monitoring</li> </ul>	National Water Act Waste Act
<b>Stormwater management</b> Stormwater channels and berms, collection of dirty water, storage for re-use	Construction Operation Decommissioning	10ha	<ul style="list-style-type: none"> <li>• Storm water management system</li> <li>• Concurrent rehabilitation and monitoring</li> </ul>	Storm water management NWA
<b>Transport systems</b> Use of access points, road transport to and from site for employees and supplies, movement within site boundary	Construction Operation Decommissioning	10ha	<ul style="list-style-type: none"> <li>• Restricted access</li> <li>• Speed limits</li> <li>• Road safety practice</li> </ul>	Road Safety Act
<b>Non-mineralized waste management</b>	Construction Operation Decommissioning Closure (limited)	100ha	Concurrent rehabilitation and best practices	MPRDA Reg 68 NEMA Waste Act
<b>Storage and maintenance services/facilities</b> Washing vehicles and machinery, storage and handling non-process materials	Construction Operation Decommissioning	0.5	•Use oil trays Waste management	MPRDA Reg 68 NEMA Waste Act
<b>Demolition</b> Dismantling, demolition, removal of equipment	Operation (as part of maintenance) Decommissioning	1,970ha	Systematic rehabilitation	Procedure for Emergency Preparedness and Response Procedure
<b>Rehabilitation</b> Replacing soil, slope stabilization, landscaping, revegetation, restoration	Construction Operation Decommissioning Closure	179.534ha	Systematic rehabilitation	Approved Rehabilitation Plan
<b>Maintenance and aftercare</b> Inspection and maintenance of remaining facilities and rehabilitated areas	Closure	179.534ha	Systematic rehabilitation	Approved Closure Plan

10. CLOSURE PLAN

<p><b>In the space provided under each heading below, please provide a high-level description of the plan for closure and the information that will be provided in the draft EMPr accompanying draft basic assessment report or environmental impact reports going forward.</b></p>	
<p><b>Baseline environment</b> Describe how the baseline environment will be determined with the input of interested and affected parties and due cognizance of the current land uses and or existing biophysical environment</p>	<p>Engage with land owners and other interested and affected parties to obtain local knowledge of the area. Information on the socio-economic, cultural and heritage as well as the biophysical environment will be solicited Land use and land management practices identification Interviews and questionnaires will be used.</p>
<p><b>Closure objectives</b> Describe the closure objectives and the extent to which they will be aligned to the baseline environment</p>	<ul style="list-style-type: none"> <li>• To leave site in a safe state for humans and animals.</li> <li>• To ensure that the water resource (surface and ground) is not affected by rehabilitation activities.</li> <li>• To promote indigenous vegetation growth suitable for animals that graze over the disturbed areas on the site.</li> <li>• Backfilling of all excavated areas will be backfilled with overburden and discard material to adopt a shape similar to its initial state.</li> <li>• Removal of all surface infrastructure from the site.</li> <li>• Cleaning and upgrading of all access to fit the current land use.</li> <li>• Top soiling of rehabilitated disturbed surfaces around the processing area.</li> <li>• Leave rehabilitated ground to ensure blending with the surrounding environment.</li> <li>• To leave the sensitive areas untouched and intact as they were prior to the mining activity.</li> </ul>
<p><b>Rehabilitation Plan</b> Describe the scale and aerial extent of the prospecting or mining listed activities to be authorised, including the anticipated prospecting or mining area at the time of closure, and confirm that a site rehabilitation plan drawn to a suitable scale will be provided in the draft EMPr to be submitted together with the draft EIR or Basic Assessment Report as the case may be.</p>	<p>Extent of the Area required for Mining 179.534ha</p> <p>Extent of the Area required for Infrastructure, Roads, Servitudes, etc. 179.534ha</p> <p>A rehabilitation plan will be provided in the final EIA/EMPr report drawn to a suitable scale showing systematic rehabilitation phases.</p>
<p><b>Rehabilitation Cost</b> Describe how the rehabilitation cost will be determined and provide a preliminary estimate thereof</p>	<p>Financial provision has been calculated according to the regulation 54 of the MPRDA and the principles presented in the guidelines for the determination of financial provision for the mining industry – and only aspects applicable to mining activities up to de-establishment are addressed in the financial provision assessment.</p> <p><b>Refer to the appended quantum calculation table.</b></p> <p>Estimated quantum of financial provision for final rehabilitation is R16, 049 881 to be provided as guarantee. Estimated Progressive Rehab Cost over the life of mine is: R162,828,843</p>
<p><b>Decommissioning</b> Considering that rehabilitation must take place upon cessation of an activity, describe when each of activities applied for will be rehabilitated in terms of either the cessation of the individual activity or the cessation of the overall prospecting or mining activity.</p>	<p>Rehabilitation of Camp Site - upon completion of the entire mining phase. Rehabilitation of excavations - immediately after depletion of coal materials. Rehabilitation of Access Roads - Once the use of specific roads ceases and upon completion of the mining work on site General surface rehabilitation - concurrent with mining activities</p>

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Signature of the applicant / Signature on behalf of the applicant:

MBG MINING AND INDUSTRIAL SUPPLIERS (PTY) LTD

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Name of company (if applicable):

17/09/2019

Date:

APPENDIX 1  
CV OF THE EAP

# MANAGEMENT

SINGO  
CONSULTING



**Dr. Singo Kenneth Ndinannyi**  
Managing Director

### QUALIFICATIONS

- Ph.D. Geology: Applied Environmental Mineralogy & Geochemistry (UJ)
- MSc Environmental Management (University of South Africa (UNISA))
- BSc (Hons) in Mining & Environmental Geology (UNIVEN)

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- ✉ kenneth@singoconsulting.co.za
- 🌐 www.singoconsulting.co.za

### AFFILIATIONS

- South African Council for Natural Scientific Professions (SACNASP: Earth Science Reg. No: 400069/16)
- Geological Society of South Africa (GSSA)
- Land Rehabilitation Society of Southern Africa (LaRSSA)
- South African Affiliates of the International Association for Impact Assessment (IAIASa)
- WESSA (People Caring for the Earth)
- Environmental Assessment Practitioners Association of South Africa (EAPASA)

He worked for Malateng Mining as Geologist Consultant and Environmental Analyst. In search for growth, he joined Noandazi Coal Company in Mozambique. Tete Coal basin as Leading Project Geologist. He worked for Anglo American Thermal Coal as a Senior Project Geologist. He is the Managing Director and Principal Consultant for Singo Consulting (Pty) Ltd

Kenneth has knowledge of Mine Water & Mine Environmental Management (acid mine drainage, heavy metal assessments & tailings management) in various commodities including Silica (general), gold, magnesite & base metals (Cu, Pb, Zn). He has extensive knowledge of defund mining waste and waste water impact assessments in communities residing in the vicinity of those mines. This knowledge was gained through MSc. Kenneth has sound knowledge of risk assessment, both in terms of human health and the environment. He is experienced in the appraisal of potential constraints, as well as devising means of mitigation through remedial strategy development, feasibility and validation.

During his PhD studies, Kenneth learned how to operate within contaminated lands. His PhD largely focused on disused mines (gold, copper & magnesite) ranging from Phase I & Phase II investigations to development of remedial strategies (i.e. Phase III). His PhD further equipped him to intensively understand the waste classification, profiling and understanding of the implications associated with the management of waste, landfill disposal profiling and development of beneficiation strategies.

"Protect & Manage the best remaining Environment"

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## APPENDIX 2 DECLARATION OF THE EAP

I, **NDINANNYI KENNETH SINGO**, declare that –

General declaration:

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

### **Disclosure of Vested Interest (delete whichever is not applicable)**

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

I DO NOT HAVE ANY VESTED INTEREST IN THE PROPOSED ACTIVITY  
OTHER THAN REMUNERATION FOR WORK PERFORMED IN TERMS OF  
THE NEMA REGULATIONS

Signature of the environmental assessment practitioner:

SINGO CONSULTING (PTY) LTD

Name of company:

17/09/2019

Date: