



mineral resources

Department:
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REPUBLIC OF SOUTH AFRICA

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Ref: NCS 30/5/1/1/3/2/1(10603)PR

20 February 2013

REGISTERED MAIL

The Director
SAHRA
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8000

SA HERITAGE RESOURCES AGENCY
RECEIVED
26 FEB 2013

CONSULTATION IN TERMS OF SECTION 40 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (ACT 28 OF 2002) FOR THE APPROVAL OF THE ENVIRONMENTAL MANAGEMENT PLAN IN RESPECT OF PORTIONS OF THE REMAINDER, PORTIONS 1 AND 2 OF THE FARM ABBASSAS NO 26 ADMINISTRATIVE DISTRICT: NAMAQUALAND

APPLICANT: BUSHBELL 118 CC

Attached herewith, please find a copy of the Environmental Management Plan received from the above-mentioned applicant, for your comments.

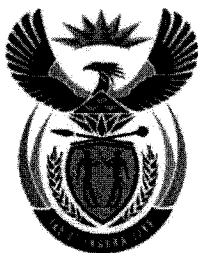
It would be appreciated if you could forward any written comments or requirements your department may have in the case in hand to this office on or before **30 April 2013**.

Consultation in this regard has also been initiated with other relevant State departments.

Your co-operation will be appreciated.

Yours faithfully

**REGIONAL MANAGER: MINERAL REGULATION
NORTHERN CAPE REGION**



mineral resources

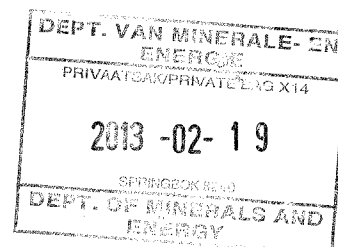
Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

NAME OF APPLICANT: Bushbell 118 CC

REFERENCE NUMBER: NC 30/5/1/1/2/10603 PR

ENVIRONMENTAL MANAGEMENT PLAN

**SUBMITTED
IN TERMS OF SECTION 39 AND OF REGULATION
52 OF THE MINERAL AND PETROLEUM
RESOURCES DEVELOPMENT ACT, 2002,
(ACT NO. 28 OF 2002) (the Act)**



1 REGULATION 52 (2): Description of the environment likely to be affected by the proposed prospecting or mining operation

1.1 The environment on site relative to the environment in the surrounding area.

Status of the cultural environment that may be affected

The Namaqualand copper and diamond mines and their associated infrastructure and cultural landscape reflect the beginnings of the mining industry in South Africa in all the myriad ways in which that industry influenced and continues to influence society through the movement and housing of people, the development of transport and other infrastructure and industries and in the development of technological and scientific endeavour.

It also reflects the very close links between the development of the Southern African mining industry and mining technology pioneered in Britain, particularly in the counties of Cornwall and Devon, and the landscapes and social structures that went with them.

In its socio-cultural aspects, the Namaqualand copper mines saw the development of the first company towns of the industrial era in South Africa and the movement of people from various parts of the Cape Colony to Namaqualand to provide labour and to serve the trade that developed here.

Any form of mining or prospecting will therefore be a continuation of the socio-cultural aspects of the area.

Status of any heritage environment that may be affected

No heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves of victims of conflict, and cultural landscapes or viewsapes are present on the prospecting area applied for. The area is already disturbed by historic mining activities and any sites of cultural significance will already be disturbed or destroyed.

Status of any current land uses and the socio-economic environment that may be directly affected

Approximately 90% of the region is used for livestock grazing and production, with the remainder comprising of mining and urban development. Urban development is not a major feature of the landscape, and is not expected to increase much in the coming years.

Prospecting will only be a temporary land use where after land use will revert back to the pre-mining land use grazing. Productivity of the land with regard to land use is very low and prospecting will have no impact on the productivity of the area

Most of the Northern Cape is defined as vacant or unspecified land use (Refer Map 1).

Status of any infrastructure that may be affected

No infrastructure will be affected. Existing roads and tracks will be used and in the case of new tracks be developed it will be addressed at final closure and rehabilitation.

Status of the biophysical environment that may be affected

Topography

Namaqualand is a unique and diverse environment – owing in large part to the presence of four distinct biogeographically regions within its boundaries. The Orange River valley lies to the north and is characterized by very dry desert conditions. In the west the area is composed of coastal plains – which transition into granite hills that straddle the escarpment, before transforming into low lying Bushmanland plains to the East of Springbok.

The site is characterized by a series of mountain ranges which together make up the western escarpment. The topography ranges from gently undulating to steeply rolling, and large granitic boulders often dominate the landscape (Refer map 6).

Soil

The soils in a regional context are diverse with rock covering about 90% of the area. The soils are typically weakly structured with low organic content. These soils drain freely which results in a soil surface susceptible to erosion, especially wind erosion when the vegetation cover is sparse and gully erosion in areas where storm-water is allowed to concentrate. The soils in the area are generally not suitable for dry land crop production therefore the pre-mining land capacity is categorized as Class III grazing land. The productivity of the area is low at 12Ha/SSU. The dominant soil type of the area is the Ag Landtipe, reddish soils with a high basesstatus and about 300 mm deep.

Detailed soil information is not available for broad areas of the country. As a surrogate, landtype data was used to provide a general description of soils in the study area (landtypes are areas with largely uniform soils, topography and climate). There is a single main land type in the study area, the Fc land type (Land Type Survey Staff, 1987).

The F-group of land types refer to pedologically young landscapes that are not predominantly rock and nor predominantly alluvial or aeolian and in which the dominant soil-forming processes have been rock weathering, the formation of orthic topsoil horizons and, commonly, clay illuviation, giving rise typically to lithocutanic horizons (MacVicar et al. 1974). The soil forms that epitomise these processes are Glenrosa and Mispah (MacVicar et al. 1974). The Fc unit refers to land types where lime occurs regularly in upland and valley bottom soils (MacVicar et al. 1974). The productivity of the area is very low at 8-10Ha/SSU (Refer Map 3).

Land Capability

The land is classified as wilderness area with subordinate grazing. This classification is more restrictive than pure grazing classification.

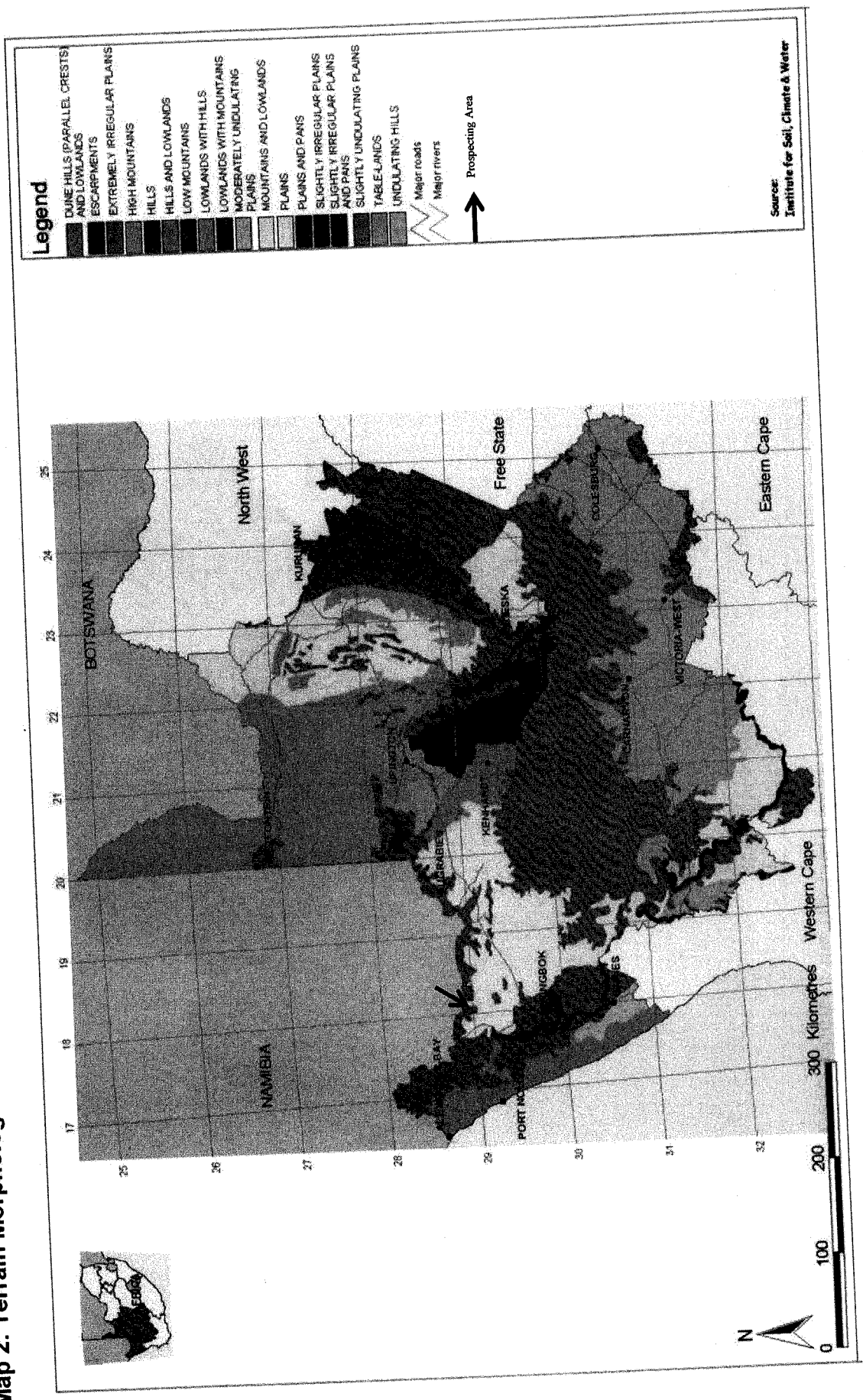
The carrying capacity of the veld is approximately 8-10ha / small stock unit (dependant on the tuning with regard to the rain/drought cycle). The aim of the rehabilitation programme is to restore the veld to its wilderness rating.

Natural vegetation / plant life

The prospecting area form part of the Gariiep Desert Bioregion within the Desert Biome and the only vegetation type is the Eastern Gariiep Rocky Desert vegetation unit.

This vegetation unit is classified from NSBA as least threatened. Although this vegetation unit is not conserved in statutory conservation areas, large parts of the area are mostly inaccessible, hence well preserved.

Map 2: Terrain Morphological units of the Northern Cape



Air Quality

The wind rose for Uppington is considered representative of the wind regime in the area. The implications on proposed prospecting activities of this wind regime are as follows:

Prevailing wind direction is from the southwest and is especially strong in summer.

Winter winds have much less speed and generally blow from the north.

Infrequent berg winds blow during the winter months. These winds are hot and dry and carry regionally generated dust.

Existing dust sources in the area is vehicle generated dust on surfaced roads.

During the digging of the prospecting trenches, dust will be generated during topsoil removal, overburden removal, gravel removal, transport of the gravel along the un-surfaced roadway, replacement of overburden and replacement of the topsoil.

These impacts are however so small as to be considered insignificant especially against the background of the small scale and isolation of the proposed prospecting.

Dust must however be minimised in terms of employee health and masks must be available at all times and the applicants must comply with the prescriptions of the Mine Health & Safety Act.

Noise

No surrounding land use or user will be impacted by noise generated from the proposed operation, given both the small scale of the operation and the isolation of the site. The following noise sources will arise as a result of the proposed operations:

Earthmoving equipment generated noise (observed estimate at ± 55 dBA).

Noise must however be minimised in terms of employee health and HPD s must be available to employees at all times and the applicants must comply with the prescriptions of the Mine Health & Safety Act.

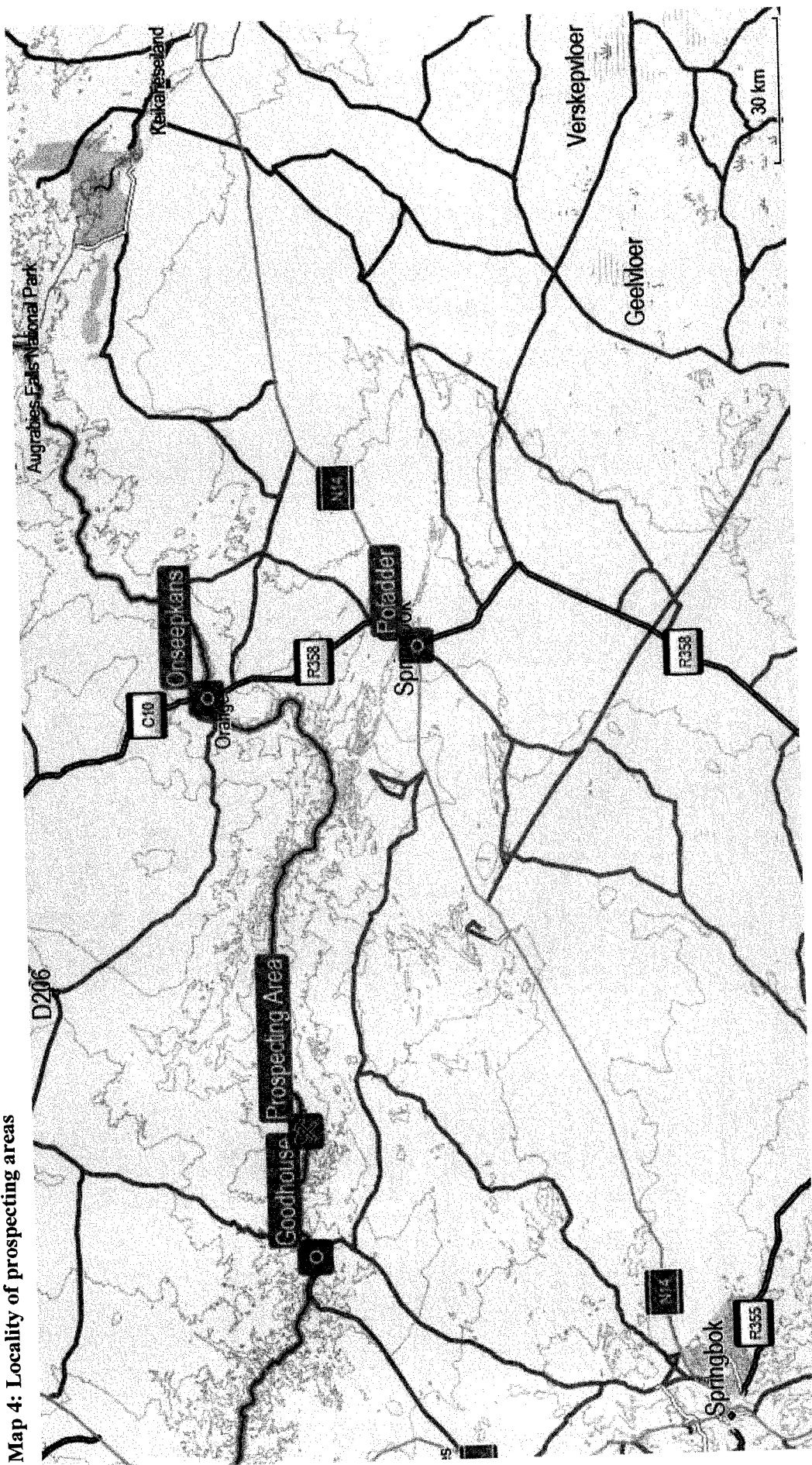
Visual Impact

The only existing visual impact as a result of mining / prospecting is the existing excavations at the site. It must be noted that the site is incredibly remote being accessed by way of servitude road. Public roads are few and far from the prospecting area and carry very little traffic while farmsteads are extremely few and far between.

Sensitive Landscapes

Areas containing untransformed natural vegetation of conservation concern, high diversity or habitat complexity, Red List organisms or systems vital to sustaining ecological functions are considered potentially sensitive. In contrast, any transformed area that has no importance for the functioning of ecosystems is considered to have low sensitivity.

Map 4: Locality of prospecting areas



2 REGULATION 52 (2) (b): Assessment of the potential impacts of the proposed prospecting or mining operation on the environment, socio-economic conditions and cultural heritage.

2.1 Description of the proposed prospecting operation.

2.1.1 Plan of the main activities with dimensions

No infrastructure including roads will be constructed so there will be no work done during the construction phase except for waste management facilities. Diagram 4 indicate the proposed position of the activities to be conducted during the operational phase but this mine plan needs to be updated on a regular basis as the information gathered during the initial phases of prospecting will determine the exact position of the activities referred to.

2.1.2 Description of construction, operational, and decommissioning phases

Construction phase

Several existing tracks exist on the site and these will be used whenever possible. The existing access road will be utilized in most cases, so no envisaged ground disturbance is planned or foreseen. If prospecting proceeds to the stage of bulk sampling then infrastructure will be developed in the form of mobile containers.

Operational phase

PHASE 1 Desktop study- Non invasive activities

Literature Study

In order to direct the exploration programme in an efficient manner, there will be a review of all information and data gathered by previous exploration in the surrounding area. A desktop study will also be undertaken of the diamond potential of the area. A site investigation of the target areas will be undertaken to identify infrastructure and determine any potential problems that may need to be addressed.

Imagery Analysis

Aerial photographs and satellite images will be studied to ascertain additional target areas for possible gravel deposits. The aerial photographs will also be used to structurally and geologically map the area.

Geological Mapping

Any anomalous features identified from the air will be mapped in detail. This will then need to be investigated on site (ground truthing).

Geophysical Survey

A 5 line kilometre magnetic survey may be undertaken using a proton-5-magnetometer. This study will result in identifying potential cross-cutting dykes where diamonds could be trapped.

Geological mapping and grab sampling will also be carried out to narrow down the area for prospecting Pits. This will result in defining target areas for pitting and reduce the total number of prospecting pits to be excavated.

The model for mineralisation in the area of interest is that of diamondiferous terraces. Samples recovered from prospecting pits in the general area have shown good prospects to host economic diamond deposits.

The applicant requires 500tonnes of concentrate product to obtain a representative sample for sufficient statistical analysis. 500tonnes of concentrate represents 50% of the ore therefore 50% will be backfilled through infield screening. When bulk sampling has been completed, then the entire trench must be backfilled with the removed material in reverse order (starting with the in-field screened gravel).

PRE-/FEASIBILITY STUDIES

PHASE 4 Resource Estimation

The project manager monitors the programme, consolidates and processes the data and amends the programme depending on the results. This is a continuous process throughout the programme and continues even when no prospecting is done on the ground.

Each physical phase of prospecting is followed by desktop studies involving interpretation and modelling of all data gathered. These studies will determine the manner in which the work programme is to proceed in terms of activity, quantity, resources, expenditure and duration.

Decommissioning phase

Regulations 56 to 62 outline the entire process of mine closure, both as a guide to the process to be followed for mine closure, and also to address the legal responsibility with regard to the proper closure of operations. In terms of Section 37 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), the holder of a right is liable for any and all environmental damage or degradation emanating from his operation, until a closure certificate is issued in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002).

"An application for a closure certificate must be accompanied by an environmental risk report which must include-

- (a) the undertaking of a screening level environmental risk assessment where-
- (b) the undertaking of a second level risk assessment on issues classified as
- (c) assessing whether issues classified as posing potential significant risks are acceptable without further mitigation;
- (d) issues classified as uncertain risks be re-evaluated and re-classified as either posing potential significant risks or insignificant risks;
- (e) documenting the status of insignificant risks and agree with interested and affected persons;
- (f) identifying alternative risk prevention or management strategies for potential significant risks which have been identified, quantified and qualified in the second level risk assessment;
- (g) agreeing on management measures to be implemented for the potential significant risks

2.1.3 Listed activities (in terms of the NEMA EIA regulations)

None of the activities listed above is a listed activity in terms of the Environmental Impact Assessment Regulations published in terms of Chapter 5 the National Environmental Management Act (Act No. 107 of 1998) except for the prospecting itself.

2.2 Identification of potential impacts

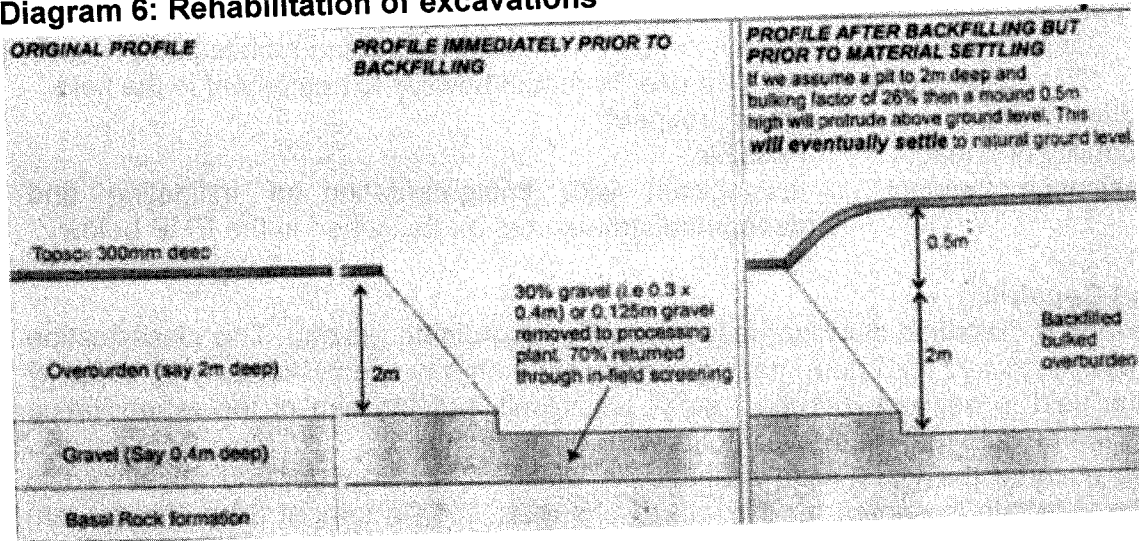
2.2.1 Potential impacts and listed activities

This impact assessment deals with all impacts and the implementation of the mitigating and management measures prescribed in the EMP will address all the existing impacts and after implementation of the mitigating measures most significant impacts can be classified as insignificant.

The impact on each of the aspects is measured according to the following table of significance:

Negative	
Significant	Recommended level always exceeded with associated widespread community action Disturbance to areas that are pristine, have conservation value, are important resource to humans and will be lost forever Complete loss of land capability Destruction of rare or endangered specimens May affect the viability of the project
Moderate	Moderate measurable deterioration and discomfort Recommended level occasionally violated - still widespread complaints Partial loss of land capability Complete change in species variety or prevalence May be managed
Minor/Insignificant	Is Insignificant if managed according to EMP provisions Minor deterioration Change not measurable Recommended level will rarely if ever be violated Sporadic community complaints Minor deterioration in land capability Minor changes in species variety or prevalence
Positive	
Minor	Improvements in local socio-economics
Significant	Major improvements in local socio-economics with some regional benefits

Diagram 6: Rehabilitation of excavations



Visual Impact

When quantifying the visual impact of the operation, such quantification must be conducted with complete isolation of the site in mind. The few roads in the area suffer little traffic.

Visual impact will thus occur through the following:

- The denuded and excavated trenches will be visible from the track between Witbank and Abbasas.
- The overburden stockpiles and topsoil berms will also be visible
- The earthmoving equipment and general activities on site will also cause visual impact

Duration or impact	Phase 2 and 3 - only as traffic passes the site on average 2 vehicles per day
Probability of impact	Definite
Significance of impact	Insignificant

Soil

The excavations will result in the following impacts on topsoil & subsoil:

- Topsoil to at least 200mm will be removed from the excavation position prior to activities taking place. Such topsoil will be removed along with vegetation, seed and bulb bank. It will be stockpiled in a berm no higher than 1.5m to the side of the excavation as shown in diagram 5 above.
- Subsoil (i.e. the sandy overburden) will be removed to a maximum depth of 2m and stockpiled in a berm up to 4m deep alongside the excavation as shown in the diagram 5 above.

Duration of impact	Phase 2 and 3
Probability of impact	Definite
Significance of impact	Insignificant, given the small scale of the proposed activities in relation to the surrounding landscape

Duration of impact	Life of mine
Probability of impact	Possibly
Significance of impact	Insignificant

Ground Water

It is unlikely that groundwater will be encountered in the shallow prospecting excavations, however should it be encountered the impact would be negligible given the small size of the excavation and that up to 70% of the gravels will be returned through infield screening before backfilling with the overburden

Duration of impact	Phase 2 and 3
Probability of impact	Unlikely
Significance of impact	Insignificant

Water required during processing of the gravels

Given the scenario as described an absolute maximum of 1.5 – 2.0m³ of water per day will be needed during bulk sampling. The water will be used at the processing plant and all water that may be lost with the tailings will be returned as groundwater. Note the gravel is inert and no impact on groundwater quality will occur.

Duration of impact	Phase 2 and 3
Probability of impact	Definitely will occur but will most likely be less than the maximum impact as described above
Significance of impact	Insignificant

Ancillary prospecting requirements

The following are other aspects of the operation that could result in environmental impact if not properly controlled or specified.

Roads & Tracks

a) Formal roads: Farm tracks quickly deteriorate should they experience more than the minimum traffic. The result is that drivers leave the deteriorated track and drive in the veld next to the track, causing extensive damage to the veld. In order to prevent such damage, these "well-travelled" routes will have to be armoured with imported material. No new roads are likely to be affected by such armoured. The following roads will experience regular traffic as follows:

- Haul roads between the prospect and the plant. This approximate 2km route is already a well-established road and no more formalization of the road will be required.
- Access to each of the prospecting box cuts will be directly from the established road and no further roads or tracks will be required for these.

Should a formal road be developed, then such road will / may require the importing of foreign material for surfacing (likely to be existing coarse tailings from the processing plant). Should such material be required and the landowner does not wish to retain the road, then the rehabilitation of such road must take place as follows:

1. Before developing the road, remove all topsoil to berms to the side of the road for re-use in rehabilitation of the road
2. During the rehabilitation of the road the following must occur:
 - a. Scarify hardened road area
 - b. Return and spread stockpiled topsoil

In addition:

- Used/replaced filters, hoses, belts, cloths, etc. are to be placed in a bin for return to the used oil and lubricant storage area which is to be constructed as shown above. Used filters are not to be buried at the site of repair (nor discarded in the excavation to be backfilled).
- In the event of soil contamination, the soils are to be treated with a suitable decontaminant such as the OT8 product range or Spillsorb or similar product.

All staff involved in mobile plant operation and maintenance is to be made aware of these oil and lubricant procedures. Staff will require instruction in the:

- Deleterious effects of oil / fuel on the environment
- Neutralization of oil leaks on the concrete apron,
- The operation of the oil trap (including the storage of trapped oil); and
- Use of OT8/Spillsorb products.

General Provisions

- All operators are to check their equipment for leaks and report such leaks on a daily basis.
- No used oils are to be used as dust suppressants on manoeuvring areas.

All staff to be instructed to report oil spills immediately and be trained in fire fighting and the use of biodegradable solvents such as OT8 or Spillsorb or similar products in the clean-up operation

Process Water

The bulk sample gravels will be processed at the mobile prospecting plant. Such plant can be moved between the different trenches and has a capacity of 15tonnes/hour (at SG of 1.85tonnes/m³ = 8.1m³ gravel processed) and uses approximately 7.5kl of water per hour. Assuming the plant runs at 80% of capacity, then 6.5m³ gravel is processed in the hour using 7.5kl of water (a ratio of approximately 0.86m³ gravel per kl (m³) of water or 1m³ gravel requires about 1.2kl of water).

So per excavation that equates to the following water requirement:

50m gravel exposure length x 22m wide x 0.35m deep gravel= 385m³ gravel

In field screening to remove +40mm material results in say 70% of gravel being backfilled into the excavation i.e. 115m³ being transported to the plant for processing

So at a requirement of 1.2m³/m³ gravel, approximately 138m³ of water will be required per excavation over a period of 2 month (40 days) or say 3.5m³ per day.

Approximately 60% of water is usually recycled from the fine tailings dam, therefore a maximum top-up requirement of 1.5 - 2.0m³ per day is anticipated.

Potable Water

Potable water will be bottled and brought to site by the employees as required as the water on site is not potable.

Mineral Processing

Mineral processing will take place on site through a mobile plant that will be moved according to the position of the trench to facilitate back filling of slimes and waste. Infield screening at the excavations will result in the requirement for the trucking of only 30% of the gravels to the processing plant. That 30% equates to maximum of 115m³ per bulk sample as described above. At a conservative SG of 1.85tonnes/m³ each bulk sample will require the transport of 213 tonnes of material to the plant. So

3 REGULATION 52 (2) (c): proposed mitigation measures to minimise adverse impacts

3.1 Concomitant list of appropriate technical or management options

The goal of rehabilitation with respect to the area is to leave the area level and even, and in a natural state containing no foreign debris or other materials. All scrap and other foreign materials will be removed and disposed of as in the case of other refuse whether these accrue directly from the prospecting operation or are brought on to the site from outside.

Topography

The inherited impact of excavations on topography will be through the pit development and the temporary overburden stockpile along the length of the excavation.

Impact mitigation will take place through:

- Limiting the depth of the excavation to a maximum of 2m deep. Prospecting in deeper soils up to 5 m will take place through probe pitting small 25m² footprint prospecting pits
- The temporary overburden stockpile will be developed to a maximum of 4m high as per the diagram in paragraph 2.2.
- Should prospecting yield negative results and the project be terminated at any stage then the excavations will be backfilled with the stockpiled overburden and covered with the stockpiled topsoil.
- Should prospecting yield positive results, then the rehabilitation of the excavations will be postponed pending the application for full mining rights on the site.

Note: The stockpiled overburden will be used to backfill the excavation. Bulking of the overburden (by up to 26%) will result in a heap developing above the backfilled excavation (as described in paragraph 2.2). This heap will eventually settle naturally resulting in no residual impact.

Visual Impact

The inherited impact of the prospecting excavations will be on all road users using the seldom used un-surfaced farm tracks. The excavations will straddle this track but traffic on this road is on average 2 vehicles per day.

Impact mitigation of this impact is not feasible but it must be noted that:

- The impact is insignificant given the small scale of the activities and the isolation of the site
- The impact is temporary and if full mining application is not considered the excavations will be backfilled, topsoiled and allowed to revegetate naturally resulting in no residual impact.

Soil

The inherited impact on soil will arise during the removal of at least 200mm (up to 300mm) topsoil prior to the excavation of the overburden. Such topsoil will be removed along with the vegetation (seeds and bulbs) to berm to the side of the excavation and the topsoil will be used as cover material after the overburden has been replaced. The topsoil will also be removed prior to the development of the overburden dump.

Air Quality

The dust impact is so minor as to not warrant any particular measures. However, employees must be supplied with masks (from a mine health and safety point of view).

Noise

Noise will not result in any impact any land user or use during the prospecting pit development given the isolation of the sites. Provide employees with HPD's.

3.2 Review the significance of the identified impacts

The potential significant inherited impacts as identified in paragraph 2.2 after implementation of the proposed mitigation measures and management options in paragraph 3.1. can all be regarded as insignificant and there will be no significant residual impacts after closure of operations.

4 REGULATION 52 (2) (d): Financial provision.

4.1 Plans for quantum calculation purposes.

Refer diagram 4 above.

4.2 Alignment of rehabilitation with the closure objectives

The goal of rehabilitation with respect to the area where prospecting will take place is to leave the area level and even, and in a natural state containing no foreign debris or other materials.

All scrap and other foreign materials will be removed from the area and disposed of as in the case of other refuse, whether these accrue directly from the prospecting operation or are brought on to the site.

Removal of these materials shall be done on a continuous basis and not only at the start of final rehabilitation and closure.

The area will be profiled to blend in with the topography of the surrounding environment. The mitigating measures described in paragraph 3 are compatible with these closure objectives.

4.3 Quantum calculations.

The area will be rehabilitated with the original land use namely small stock farming in mind and the productivity of the area after closure will be the same as before prospecting operations started. Rehabilitation cost is estimated with the proposed end-state in mind and although the applicant has his own equipment and rehabilitation will take place concurrent with prospecting the tariffs for equipment was based on local hiring tariffs in Springbok the closest major town 150Km to the southwest.

The provision for rehabilitation of the site will be supplied by means of a bank guarantee to be supplied to the Department of Minerals Resources. The purpose of such a fund provision is to provide for rehabilitation of the site by State nominated contractors should the applicant for any reason be unable to complete the rehabilitation activities or complete them insufficiently.

4.4 Undertaking to provide financial provision

Financial provision required under Regulation 54 for the amount of R 60 000.00 will be furnished to DME. The quantum will be updated again within a year or at a shorter interval if there is any deviation from the prospecting work program.

5 REGULATION 52 (2) (e): Planned monitoring and performance assessment of the environmental management plan.

5.1 List of identified impacts requiring monitoring programmes.

None of the impacts identified required specific monitoring programs but inspections and monitoring shall be carried out on both the implementation of the program and the impact on the natural and cultural environment. Visual inspections on erosion and physical pollution shall be carried out on a regular basis together with fixed point photography.

5.2 Functional requirements for monitoring programmes

Every aspect of the operation must be checked against the prescriptions given in this document and if find that certain aspects are not addressed or impacts on the environment are not mitigated properly, the identified inadequacies will be rectified immediately.

Regular monitoring of all the environmental management measures and components shall be carried out to ensure that the provisions of this program are adhered to. Layout plans will be updated on a regular basis and updated copies will be submitted on an annual basis to the Regional Manager. The plans will also be updated before commencing with excavations and the rehabilitation quantum will also be updated. Reports confirming compliance with various points identified in this program will be submitted to the Regional Manager on an annual basis together with an update of the rehabilitation cost. Any emergency or unforeseen impact will be reported as soon as possible. An assessment of environmental impacts that were not properly addressed or were unknown when the program was compiled shall be carried out and added as a corrective action.

5.3 Roles and responsibilities for the execution of monitoring programmes

The project manager will be responsible for monitoring and Reports confirming compliance with various points identified in the environmental management program.

5.4 Committed time frames for monitoring and reporting

The project manager must on a bi-monthly basis, check every aspect of the operation against the prescriptions given in this document and, if find that certain aspects are not addressed or impacts on the environment are not mitigated properly, the project manager must rectify the identified inadequacies immediately.

6 REGULATION 52 (2) (f): Closure and environmental objectives.

6.1 Rehabilitation plan

The goal of rehabilitation with respect to the area where excavations will take place is to leave the area level and even, and in a natural state containing no foreign debris or other materials.

- 7.1.4 State specifically whether or not a land claim is involved.
No as the Nama khoi local authority is regarded as the management authority of the land on behalf of the local community and there are no land claim registered against the properties
- 7.1.5 Name the Traditional Authority identified
No Traditional Authority only local municipality
- 7.1.6 List the landowners identified by the applicant.
Refer to consultation template attached as appendix 1
- 7.1.7 List the lawful occupiers of the land concerned.
Refer to consultation template attached as appendix 1
- 7.1.8 Explain whether or not other persons' socio-economic conditions will be directly affected by the proposed prospecting or operation
The only other land use in the area is small stock grazing and due to the small scale of operations there will be no impact on productivity.
- 7.1.9 Submit evidence that the landowner or lawful occupier of the land in question, and any other interested and affected parties were notified.
The landowners are deemed the only affected party and consultation has taken place by means of registered letters and/or personal communication. Letters to this regard is attached as Appendix 2
- 7.2 The details of the engagement process.
- 7.2.1 Description of the information provided to the community, landowners, and interested and affected parties.
A copy of the PWP and the scoping report (consultation template) was supplied and or explained to them.
- 7.2.2 List of views raised by consulted parties regarding the existing cultural, socio-economic or biophysical environment.
No views or comment received
- 7.2.3 List of views raised by consulted parties on how their existing cultural, socio-economic or biophysical environment potentially will be impacted on by the proposed prospecting or mining operation
The only views or comments received were with regard to access routes and water use as well as disturbance to grazing land.
- 7.2.4 Other concerns raised by the aforesaid parties
No views or comment received
- 7.2.5 Confirmation that minutes and records of the consultations are appended.
The landowners are deemed the only affected party and consultation has taken place by means of registered letters and/or personal communication. Letters to this regard is attached as Appendix 2

- The second step will be a description of the components and phases of the specific mining operation.
- The third step will be a general account of how the mining operation and its associated activities can affect the environment, giving rise to what we call Environmental Impacts.
- The fourth and most important step will be a discussion of what staff can do in order to help prevent the negative environmental impacts from degrading our environment. This is known as Environmental Impact Management.

9 SECTION 39 (4) (a) (iii) of the Act: Capacity to rehabilitate and manage negative impacts on the environment.

9.1 The annual amount required to manage and rehabilitate the environment. Refer to section 4 that covers regulation 52 (2) (d) that handles with financial provision.

9.2 Confirmation that the stated amount correctly reflected in the Prospecting Work Programme as required.

This amount was provided for in the cost estimate for the implementation of the PWP and proof of access to the necessary funds were supplied with the prospecting work program.

10 REGULATION 52 (2) (h): Undertaking to execute the environmental management plan.

Herewith I, the person whose name and identity number is stated below, confirm that I am the person authorised to act as representative of the applicant in terms of the resolution submitted with the application, and confirm that the above report comprises EIA and EMP compiled in accordance with the guideline on the Departments official website and the directive in terms of sections 29 and 39 (5) in that regard, and the applicant undertakes to execute the Environmental management plan as proposed.

Full Names and Surname	Simon Petrus Basson
Identity Number	6807295115085

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