



**BASIC ASSESSMENT REPORT AND ENVIRONMENTAL
MANAGEMENT PROGRAMME FOR A MINING PERMIT
APPLICATION.**

MODISON MINING (PTY) LTD

REFERENCENO: LP 30/5/1/3/2/11962MP

August 2023

Submitted for environmental authorizations in terms of the National Environmental Management Act, 1998 and the National Environmental Management Waste Act, 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (as amended)

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IMPORTANT NOTICE

In terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002 as amended), the Minister must grant a prospecting or mining right if among others the mining “will not result in unacceptable pollution, ecological degradation or damage to the environment”.

Unless an Environmental Authorisation can be granted following the evaluation of an Environmental Impact Assessment and an Environmental Management Programme report in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), it cannot be concluded that the said activities will not result in unacceptable pollution, ecological degradation or damage to the environment.

In terms of section 16(3)(b) of the EIA Regulations, 2014, any report submitted as part of an application must be prepared in a format that may be determined by the Competent Authority and in terms of section 17 (1) (c) the competent Authority must check whether the application has considered any minimum requirements applicable, or instructions or guidance provided by the competent authority to the submission of applications.

It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or a permit are submitted in the exact format of, and provide all the information required in terms of, this template. Furthermore, please be advised that failure to submit the information required in the format provided in this template will be regarded as a failure to meet the requirements of the Regulation and will lead to the Environmental Authorisation being refused.

It is furthermore an instruction that the Environmental Assessment Practitioner must process and interpret his/her research and analysis and use the findings thereof to compile the information required herein. (Unprocessed supporting information may be attached as appendices). The EAP must ensure that the information required is placed correctly in the relevant sections of the Report, in the order, and under the provided headings as set out below, and ensure that the report is not cluttered with un-interpreted information and that it unambiguously represents the interpretation of the applicant.

OBJECTIVE OF THE BASIC ASSESSMENT PROCESS

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

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

ACRONYMS

BAR	Basic Assessment Report
CBA	Critical Biodiversity Area
CITIES	Convention on International Trade in Endangered Species
DEA	Department of Environmental Affairs
DMR	Department of Mineral Resources
DWS	Department of Water and Sanitation
DAFF	Department of Agriculture Forestry and Fisheries
EMF	Environmental Management Framework
EMP	Environmental Management Plan
EIR	Environmental Impact Report
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officers
ESA	Ecological support area
EAP	Environmental Assessment Practitioner
GDP	Gross Domestic Product
IAPs	Interested and Affected Parties
IDP	Integrated Development Plan
LEDET	Limpopo Economic Development, Environment & Tourism
MPRDA	Mineral and Petroleum Resources Development Act
MP	Mining Permit
NEMA	National Environmental Management Act
NEMBA	National Environmental Management Biodiversity Act, 10 of 2004
NWA	National Water Act, Act 36 of 1998
SDF	Spatial Development Framework
SAHRA	South African Heritage Resource Agency
SANBI	South African National Biodiversity Institute
SFSD	Strategic Framework for Sustainable Development
MLM	Musina Local Municipality
VDM	Vhembe District Municipality

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PART A: SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

1.1 Contact details of EAPs

Table 1: Details of EAPs

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1.2 Expertise and Qualifications of EAPs

Table 2: Expertise and Qualifications of EAP

EAP	Experience
Mukondeleli Makoya	I am a registered EAP professional [EAPASA] and a SACNAPS candidate scientist with over 8 years of experience in environmental Management services obtained from the construction, mining, and energy sector and sustainable developments. Successful in compiling EIAs and EMP related to energy, oil, gas and mining as well as other licenses for various operations. I'm well experienced in environmental auditing, enforcement, compliance, monitoring, risk assessment. Ability to manage a project from proposal phase until project close out. Knowledgeable in South African environmental legislations and renewable energy legislations. Well-versed in stakeholder engagement and liaison with multi-disciplinaries. Good report writing skills along with the ability to gather and interpret information. I am deadline driven and prioritize delivering high-quality work. She demonstrates knowledge for various environmental legislation such as NEMA (Act 107 of 1998) as amended, NWA (Act No. 36 of 1998), Environmental Impact Assessment (EIA) regulations, 2014 as amended, MPRDA (Act No 28 of 2002), NEMBA, NEMWA, MENPAA, etc. as well EMF's and LUDS for various municipalities

1.3 Location of the activity

The proposed activity is located over the farm Suez 12 MR in the Musina Local Municipality at Vhembe Magisterial District of the Limpopo Province. The proposed area is located approximately 25 km Northwest of Alldays Town. There are unnamed gravel roads that lead to the project site from the R572 tarred road from town. See Figure 1 for the locality map.

Table 3: Site Details

Farm Name:	Suez 12 MR
Proposed Minerals:	Chrome Ore
Application area (ha):	The area extent is approximately 5 ha
Magisterial district:	Musina Local Municipality, Vhembe Magisterial District
Distance and direction from nearest town	The proposed area is located approximately 25 km North West of Alldays Town.
21-digit Surveyor General Code for each farm portion	T0MR000000001200000

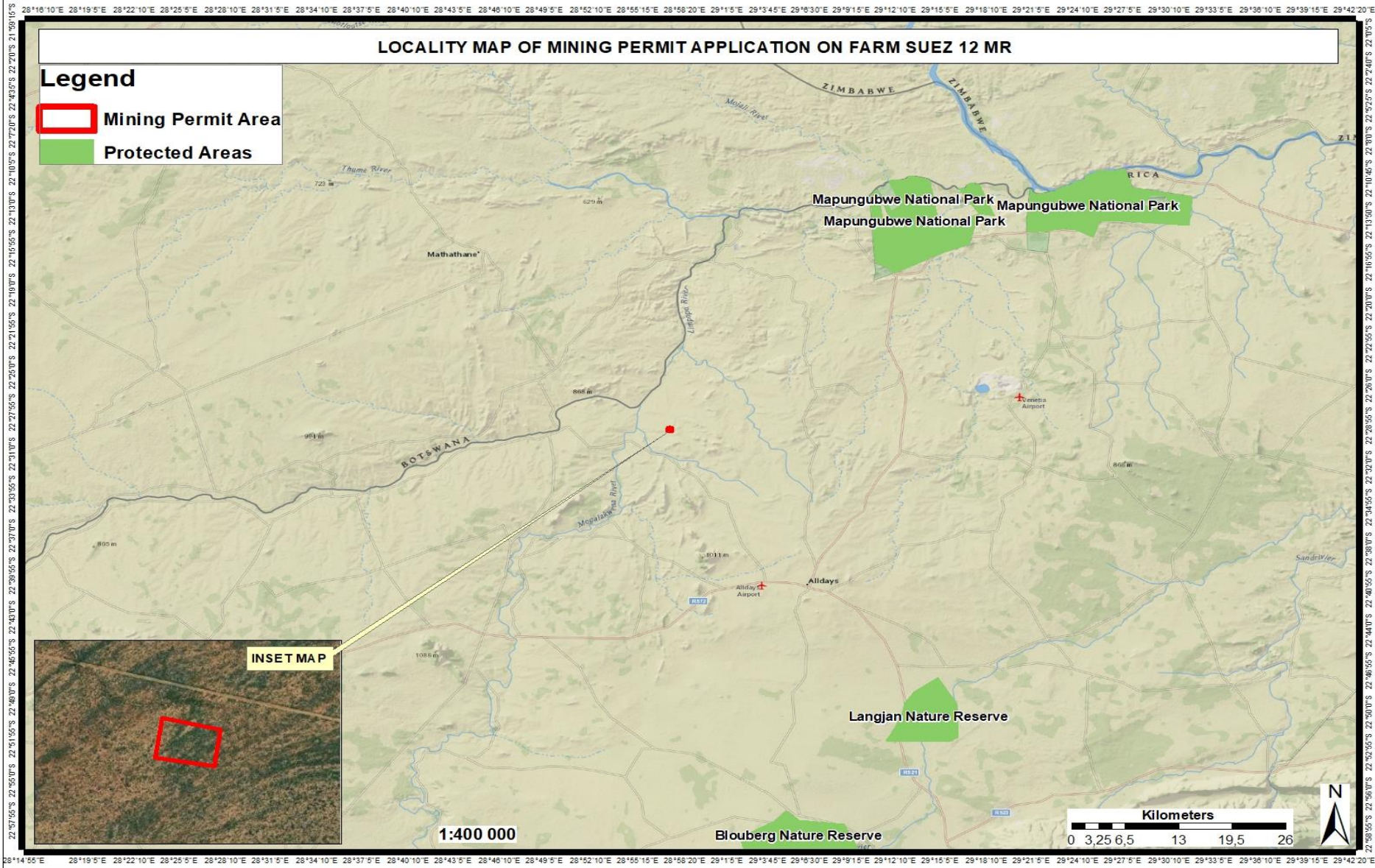


Figure 1: Locality map of the proposed Mining Permit.

1.4 Description of the scope of the proposed overall activity.

(Provide a plan drawn to a scale acceptable to the competent authority but not less than 1: 10 000 that shows the location, and area (hectares) of all the aforesaid main and listed activities, and infrastructure to be placed on site)

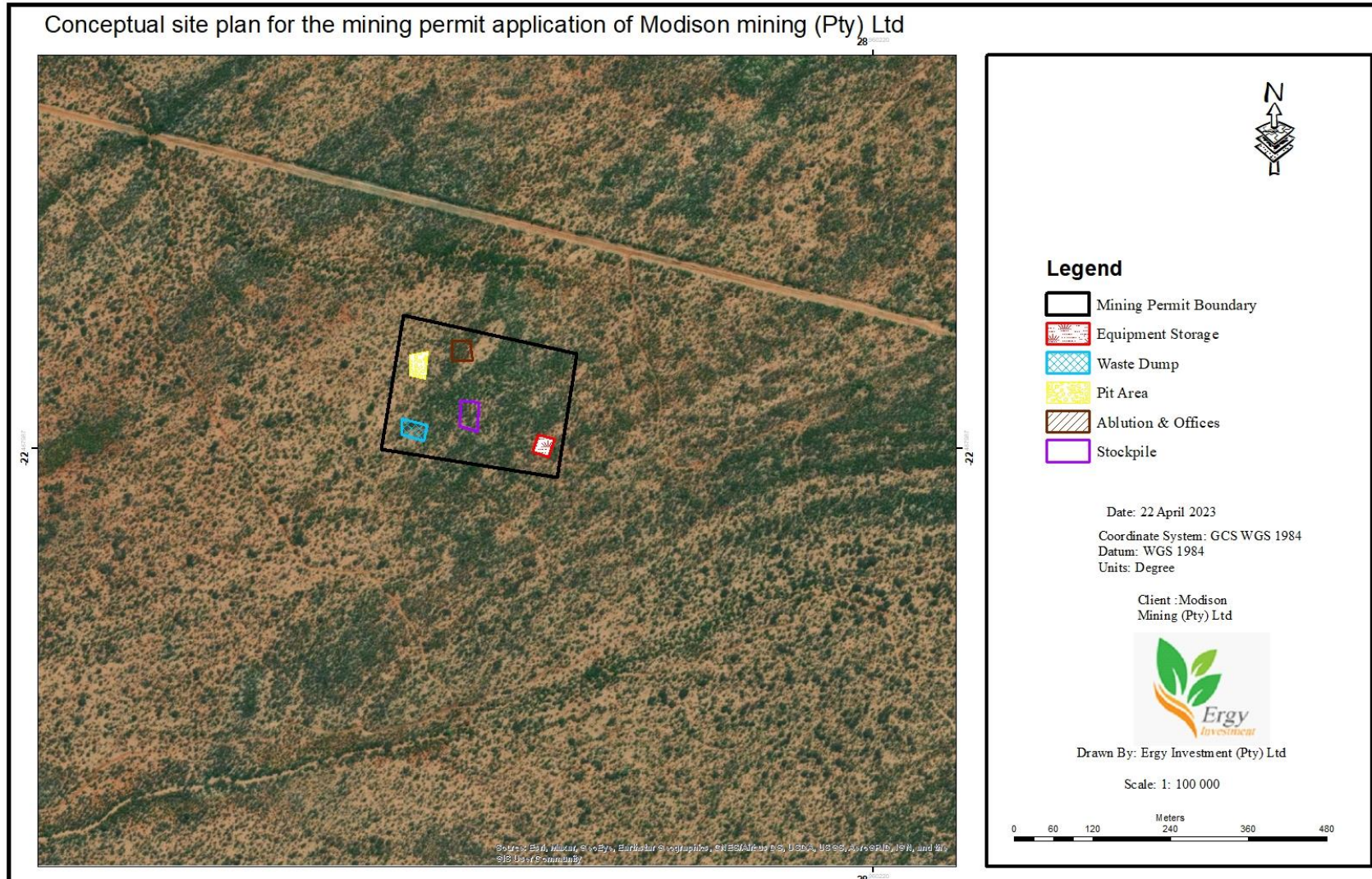


Figure 2: proposed conceptual site plan for the proposed Mining Permit

1.4.1 Listed and specified activities

Table 4: NEMA triggered activities

Name of activity	Aerial extent of the Activity ha or m ² .	Listed activity Mark with an x where applicable or affected.	Applicable listing notice (gnr 544, gnr 545 or Gnr 546)	Waste management authorisation
<ul style="list-style-type: none"> • Excavation or pit area • Topsoil stockpile-250m² • Crushing, & screening plant • Waste rock dump 	3 ha	x	EIA Regulation Listing Notice 1, 2014 (GN R 983 of 2014) – Activity 21: Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the mining permit.	N/A
Surface infrastructures <ul style="list-style-type: none"> • mobile site office • ablution facility • oil storage bay • parking bay, • Access route • Fencing 	2000m ²	x	EIA Regulation Listing Notice 1, 2014 (GN R 983 of 2014) – Activity 27 The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for - (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	N/A

1.4.2 Description of the activities to be undertaken

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

The primary activities that will be carried out as part of the mining permit application are detailed below in their respective phases. These phases include:

- Construction phase
- Operational phase
- Decommissioning and Closure phase

Construction phase

Site preparation.

- This phase will include the clearing or removing any vegetation present in the site where mining will be carried out, as well as additional areas where surface infrastructures will be erected (mobile offices and ablution facilities will be utilized).
- Topsoil will be ripped, removed, and stockpiled on a flat area and be covered with a strong sack to prevent erosion.
- Lockable facilities for hazardous substances and bunded areas for small scale maintenance will be used.
- Assembling the crushing & screening plant

Operational Phase

- During the operational phase, all mining activities and processes will commence. The primary mining method that will be adopted is the opencast mining which involves excavation of pits/trenching to remove desired minerals and haul the ore for processing.
- The mining method will include drilling, trenching and blasting. Blasting will be implemented where hard rock is encountered and the type of blasting that will be used is electronic blasting, which is progressively forming an integral part of safe,

productive, and environmentally-conscious blasting in the South African mining industry

- The overburden material with less or no ore content will be stored until mining activities lapses and will be used to fill up the open pit.
- After mining, the ore bearing rock will transported to the washing plant site where it will be processed further, or the ore will be crushed and screened before it is transported to the market.

Decommissioning and Close phase

- Concurrent rehabilitation of areas with less or no ore will be carried out throughout the life of the mine as mining progresses.
- The excavated pits will be backfilled with waste rock and the removed topsoil. Where necessary, the surface will also be graded to establish a safe slope. Backfilled areas will then be revegetated.

Upon completion of all mining activities, the entire project site will be rehabilitated in full. All the infrastructure will be removed from site and the mining area will be sloped and vegetated where vegetation was removed for mining and infrastructural purpose.

1.5 Policy and Legislative framework

Table 5: Applicable legislations to this application.

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT (A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process)	REFERENCE WHERE APPLIED (i.e., Where in this document has it been explained how the development complies with and responds to the legislation and policy context)	HOW DOES THIS DEVELOPMENT COMPLY WITH AND RESPOND TO THE POLICY AND LEGISLATIVE CONTEXT? (E.g., In terms of the National Water Act: -Water Use Licence has/has not been applied for)
The constitution of the Republic of South Africa.	Mining Permit application	The Bill of Rights, in the Constitution of South Africa (No. 108 of 1996), states that everyone has a right to a non-threatening environment and requires that reasonable measures are applied to protect the environment. This protection encompasses preventing pollution and promoting conservation and environmentally sustainable development. These principles are embraced in NEMA and given further expression. The development will ensure that as little damage as possible will be left on the surrounding environment and local community. This report is drafted to ensure compliance to this piece of legislation.

<p>Minerals and Petroleum Resources Development Act (No 28 of 2002).</p>	<p>Mining Permit Application</p>	<p>Section 27 of the Act and regulation 14 of the Government Notice No, R 526 on the 23rd of April 2004 provides for the procedure for the application, issuing and duration of the mining permit. The procedure was followed in the application of this permit</p>
<p>National Environmental Management Act, 1998 [Act 107 Of 1998], as Amended</p>	<p>Environmental Authorisation Application and BAR</p>	<p>The Mining permit application requires a Basic Assessment to be Conducted in terms of the NEMA Regulations of 2014 as amended in April 2017. The NEMA regulations identify DMR as the Competent Authority and details of the Basic Assessment process to be followed. The Environmental Authorisation application has been lodged and the Basic Assessment report requirement is fulfilled by this report.</p>
<p>Environmental Impact Assessment (EIA) Regulations, 2014</p>	<p>Environmental Authorisation Application and BAR</p>	<p>This regulation gives guidelines in terms of methodology to be followed in terms of the requirement by NEMA and the content of the report thereof. This report forms part of the Basic Assessment of the EIA being undertaken and the EA application is lodged.</p>
<p>National Environmental Management: Biodiversity Act 2004 (ACT NO. 10 OF 2004)</p>	<p>Vegetation clearance</p>	<p>BGIS LUDS has been consulted when determining the baseline environmental conditions for the areas impacted by proposed surface activities.</p>

National Water Act, 1998 (ACT NO. 36 OF 1998)	Operational Phase	<p>The principles of the NWA will be applied to all physical activities implemented during operational phase. The purpose of the National Water Act of 1998 (Act no.36 of 1998) is to ensure that the nation's water resources are protected, used, developed, conserved, managed and controlled in a manner that promotes equitability, efficiency and sustainability for present and future generations. To do so, the National Water Act regulates the following water uses: Water Use Authorisation and The Water Use License.</p>
National Heritage Resources Act, 1999 (ACT NO. 25 OF 1999)	Construction and Operational phase	No heritage resource was observed onsite, however all activities covered by this application will avoid any heritage resource (should they be identified during the mining process) to prevent the destruction or unsympathetic alteration of heritage resources that have either Formal or General Protection.
The Mine Health and Safety Act, 1996 (No 26 of 1996)	Construction Operational and closure phase	<p>The Mine Health and Safety Act, 1996 (No 26 of 1996) provides for the protection of health and safety of employees and other persons at mines and serves-</p> <ul style="list-style-type: none"> • To promote a culture of health and safety; • To provide for the enforcement of health and safety measurements;

		<ul style="list-style-type: none"> • To provide for appropriate systems for employee, employer and state participating to provide effective monitoring systems and inspections, investigations and inquiries to improve health and safety; • To promote training and human resource of development; To regulate employers' and employees' duties to identify hazards and eliminate, control and minimise the risk to health and safety; • To entrench the right to refuse to work in dangerous conditions. This act will be applied during all phases of the mining permit
<p>Conservation of Agricultural Resources Act 1983(ACT NO. 43 OF 1983)</p>	<p>Operational phase</p>	<p>The Act provides for control over the utilisation of the natural agricultural resources of the Republic in order to promote the conservation of the soil, the water sources and the vegetation and the combating of weeds and invade plants; and for matters connected therewith.</p> <p>All invader species classified in terms of the Conservation of Agricultural Resources Act 1983 (Act 43 of 1983) within the road reserve should be identified and eradicated in an ecologically sensitive manner during the construction phase.</p>

Screening Tool	Application phase	Compulsory submission of a report generated from the national web- based environmental screening tool, as contemplated in Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations, 2014, published under Government Notice No. R982 in Government Gazette No. 38282 of 4 December 2014, was undertaken prior to the application of the EA to advise of the sensitivity of the Area, The screening tool is attached as Appendix B4.
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1.6 Need and desirability of the proposed activities

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

The mining industry contribute over 50% to the country's GDP and it is regarded as the critical economic cornerstones. The mining industry is known to employ a lot of people and it contributes to the local economy within which it is located by employing local people and developing infrastructures within the local communities.

The associated mining activities, although at a small scale will contribute to the above-mentioned benefits, providing the very much needed jobs (given the high level of unemployment), preferentially to members of the nearest community. Mining contributes to the GDP and foreign exchange earnings through export. The development will therefore positively contribute to reducing the unemployment rate in the region and potentially improve literacy levels.

Chrome ore is in high demand because it is widely used all over the world for different things. Chrome is used in chrome plants as an alloy for production of corrosion resistant superalloys, nichrome, and stainless steel. Chromium is used as a pigment for glass, glazes, and paint, and as an oxidizing agent for tanning leather. It is also sometimes used as a gemstone.

1.7 Motivation for the overall preferred site, activities and technology

The selected/preferred site, activities, and technology to be used is chosen attributable to the underlying geology of the area.

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

1.8.1 Details of the development footprint alternatives considered.

(The location of the activity, the type of the activity, the design or layout plan and operational aspects of the activity were all determined by the type of the mineral, availability and positioning)

i. The property on which or location where it is proposed to undertake the activity;

The mining activities will take place over the farm Suez 12 MR. The portion of the farm is currently used for farming. Adjacent to the farm is a nature reserves which is no longer operational and is closed for business. There were animals spotted in the surrounding farms.

ii. The type of activity to be undertaken

The activities that will be undertaken include drilling and electronic blasting, stripping of topsoil to expose the orebody, excavating of pits to remove the ore and hauling of ore material for processing. Crushing and screening will be undertaken only if the consumer requires the ore to be crushed and screened.

iii. The design or layout of the activity

Mining Permit is valid for short period of time and the operation is structured for the duration of the mining permit. Only mobile infrastructures such as offices, toilets, crushers, conveyors will be utilized to reduce the costs of development and reduce impacts on the environment.

iv. The technology to be used in the activity;

The conventional method of excavating/trenching and electronic blasting as well as loading and hauling will be used for this mining permit. This is because this method is progressively forming an integral part of a safe, productive, and environmentally conscious blasting in the South African mining industry.

v. The operational aspects of the activity

The operational aspect of the activity was assessed, but no alternatives for the road, mineral and design were considered. The existing roads will be used to access the site.

vi. The option of not implementing the activity

The option of not undertaking mining activities on the site assumes that the site will remain on its current state, therefore the option of not implementing would result in no impacts on the social and biophysical environment. However, the option of not implementing the activity will result in a missed opportunity of socio-economic benefits to the few members of the community as well as the local business suppliers. And there will be no new commodities discovered that can boost the economy as new projects emerge with success exploration and subsequent mining

1.8.2 Details of the public participation process followed

(Describe the process undertaken to consult interested and affected parties including public meetings and one on one consultation. NB the affected parties must be specifically consulted regardless of whether they attended public meetings. (Information to be provided to affected parties must include sufficient detail of the intended operation to enable them to assess what impact the activities will have on them or on the use of their land).

Objectives of the public participation process

- To Provide I&APs with sufficient and accessible information to assist them to raise comments and make recommendations which will be considered during the impact assessment phase;
- The purpose of the public participation process is to notify I&APs of the proposed Project and to provide them with the opportunity to raise issues or concerns regarding the proposed Project;
- To Provides I&APs with the opportunity of suggesting ways of reducing or mitigating negative impacts of an activity and for enhancing positive impacts;

The following steps were followed to meet and satisfy the public participation process:

Identification of interested and affected parties (I&Aps)

The NEMA Regulations requires identification of and consultation with I&APs. The term I&AP generically refers to persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. A register of I&APs in terms of Section 42 of the EIA Regulations (GN R 982 of 2014) was compiled. The I&AP database includes, amongst others; landowners, communities, regulatory authorities and other specialist interest groups. This regulation requires that a register with full contact details of registered I&APs be submitted to the competent authority.

Notification and registering of all interested and affected parties (I&Aps)

As part of notification process, the land occupants and adjacent farm owners and farm occupants and registered interested and affected parties (I&Aps) were notified via site notices, newspaper advert and notification letters. A draft BAR Was sent to all registered and interested parties. The following notification process was followed in order to notify I&Aps about the project that will be happening in their

area; email, phone call, notification letters, newspaper adverts and Site notices.

Availability of BID and Draft Basic Assessment Process.

A Basic Assessment Report and Environmental Management Programme (BAR &EMPr) was made available to all registered interested and affected parties upon request for a period of 30 days. This was accompanied by a Background Information Document (BID) which summarizes the application process as well as the impacts associated with the proposed project.

Public Meeting

A general public meeting was scheduled for the 15th of April 2023 in Platjan Lodge, in Alldays and there were no attendees to this meeting. Prior to the public meeting, a campaign of farm visits to locate farm owners and farm dwellers was conducted in order to identify Interested and affected parties. Stakeholders were notified via email and hand delivery of the project documents, and comments and concerns on the applications are captured in the Table 6 below.

1.8.3 Summary of the issues raised by the interested and affected parties (I&Aps)

(Complete the table summarising comments and issues raised, and reaction to those responses)

Table 6: Summary of issues raised by interested and affected parties (I&APs)

INTERESTED AND AFFECTED PARTIES	DATE AND METHOD OF THE COMMENTS RECEIVED	COMMENT	RESPONSE
Landowners Representative- Farm Dardanellen- Gunter	Farm visit to identify I&AP on the 22 March 2023	No Issues with the prospecting, you can even buy me out since farming is not doing well anymore.	At this stage we are still looking to prospect and conduct a small-scale mining to test the economic viability of the chrome ore in this place, if this is successful, Modison mining together with their legal team will further communicate with you as a farm owner
Landowners Farm Dardanellen- Dan Du Plessis	Farm visit to identify I&AP on the 22 March 2023	No Issues with prospecting	Thank you for supporting the proposed prospecting and mining activities

Land owners Farm Suez- (Farm keeper)	Farm visit to identify I&AP on the 22 March 2023, 29 th March & 25 th April	The owner is not home, he will pass the documentation to him upon his return	Noted, thank you
Dept of Agriculture, Conservation and Environment- Registry	Hand delivery of the BAR on the 25 th of April 2023		No comment received to date
Dept of Rural development and Land reform- Registry	Hand delivery of the BAR on the 25 th of April 2023		No comment received to date
Dept of land claims commission North West- Agnes Montwedi	Hand delivery of the BAR on the 25 th of April 2023		No comment received to date
Musina Local Municipality- Registry	Hand delivery of the BAR on the 26 th of April 2023		No comment received to date
Vhembe District Municipality - Registry	Hand delivery of the BAR on the 25 th of April 2023		No comment received to date

1.8.4 The environmental attributes associated with the alternatives.

(The environmental attributes described must include socio-economic, social, heritage, cultural, geographical, physical and biological aspects)

Baseline Environment

(a) The type of environment affected by the activity

(Its current geographical, physical, biological, socio-economic and cultural character).

This section is intended to provide environmental information which is associated with the proposed site. It will identify all environmental aspects within the site that will need special consideration during all the phases of the projects with the intent to minimize impacts.

Climate

Climate plays an important role in determining the availability of water resources, the nature of the natural landscape and vegetation types. As of late, the number of sun days and the frequency of wind has become a significant consideration in terms of the availability of alternative power. There is a wide variation in climate throughout the Limpopo Province

The climate in Limpopo is hot and dry, and varies from sub-tropical to semi-arid. During summer, thunderstorms are a normal occurrence, bringing relief to long, hot days. High evaporation levels are experienced due to the prolonged heat in the area.

The general climate around the project area displays very hot summers and cold winters, the summer months (from August to March) bring brief but refreshing afternoon thundershowers. Blouberg is a hot area with annual rainfall varying between 380 and 550mm. Most rainfall is experienced during the summer months. Evapotranspiration during the rainy season is very high

Temperatures

The Limpopo province is one of the warmest regions in South Africa with an average daily high temperature of 26 degrees. For several months of the year, it is warm to hot at temperatures continuously above 25 degrees, sometimes up to 29 degrees.

The absolute maximum temperatures of Alldays are more than 40, 6°C (SoER, 2002). The absolute minimums recorded varies between 12°C and -16°C (See figure 2)

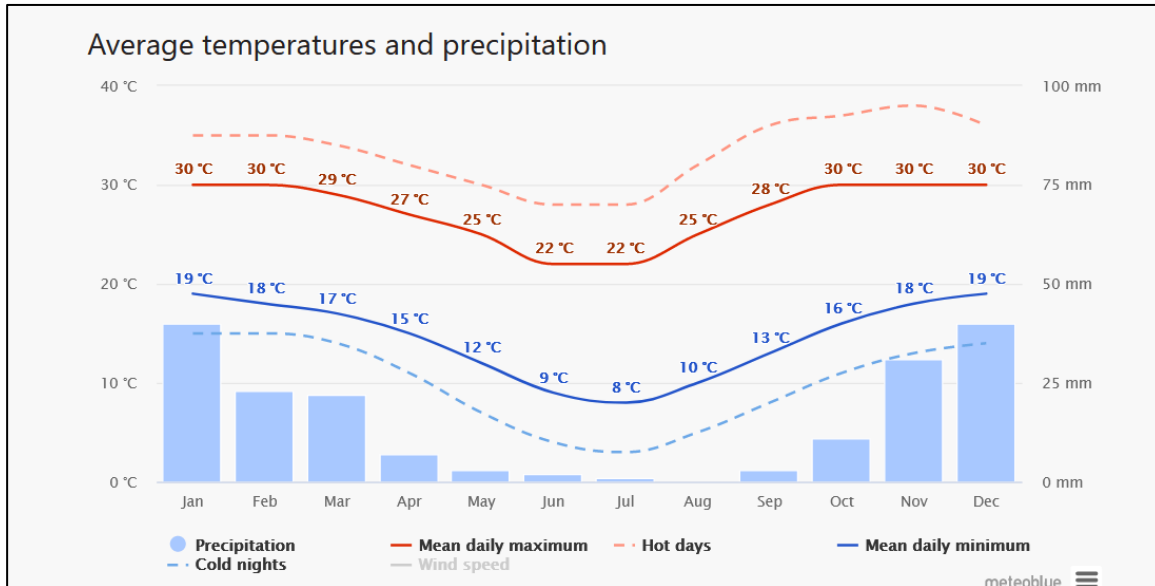


Figure 3: Average temperatures and Precipitation of the Musina Local Municipality

The "mean daily maximum" (solid red line) shows the maximum temperature of an average day for every month for Alldays and the "mean daily minimum" (solid blue line) shows the average minimum temperature. Hot days and cold nights (dashed red and blue lines) show the average of the hottest day and coldest night of each month

Rainfall

Rainfall occurs mainly during late summer with thunderstorms and can be highly erratic during late January - February). Annual rainfall varies between 300 and 550mm with the potential evaporation well in excess of the rainfall. Most rainfall is experienced during the summer months. Evapotranspiration during the rainy season is very high.

The area is prone to frequent drought, which has an adverse effect on the local economy. Runoff is low due to the prevalence of sandy soils in the most of the study area, however, loam and clay soils are also found.

The prospecting works will be planned to avoid rainy seasons. This will minimize impacts associated with soil compaction and soil erosions.

Water Resources

The northern border of the Project area is the Limpopo River, which flows in an north-easterly and later easterly direction into Mozambique and drains into the Indian ocean. Six major river systems, the Matlabas, Mokolo, Lephalala, Mogalakwena, Sand and Nzhelele, together with other smaller tributaries, all flow north into the Limpopo River and make up the six tertiary catchments.

The regional geology of the project area is mostly granites, gneisses, schists and sandstones influence the morphology which can generally be described as plains with low to moderate relief areas of low to higher mountains with or without plateaus.

Surface water run-off and its contribution to the recharge of the aquifers (underground water storage areas) is dependent on the morphology and the climate, with evaporation generally exceeding precipitation which is low in the project area.

The aquifers are characterised by the lithology and structural geology of the area in which they occur. They range from poor to moderate in terms of quality (chemically influenced by the rocks) and quantity (yield) in mafic and granitic zones to good and very good aquifers in some of the gneiss zones and sandstones, mostly associated with weathering of the rocks and faults.

Although In terms of SANBI: National Freshwater Ecosystem Priority Areas (2007) the Project area is comprised of many rivers and tributaries in and around the project area, the only river that currently has water is the Mogalakwena river which drains into the Limpopo River and buffers zones of 200m must be applied to any river or tributaries to avoid contamination during rainy seasons.

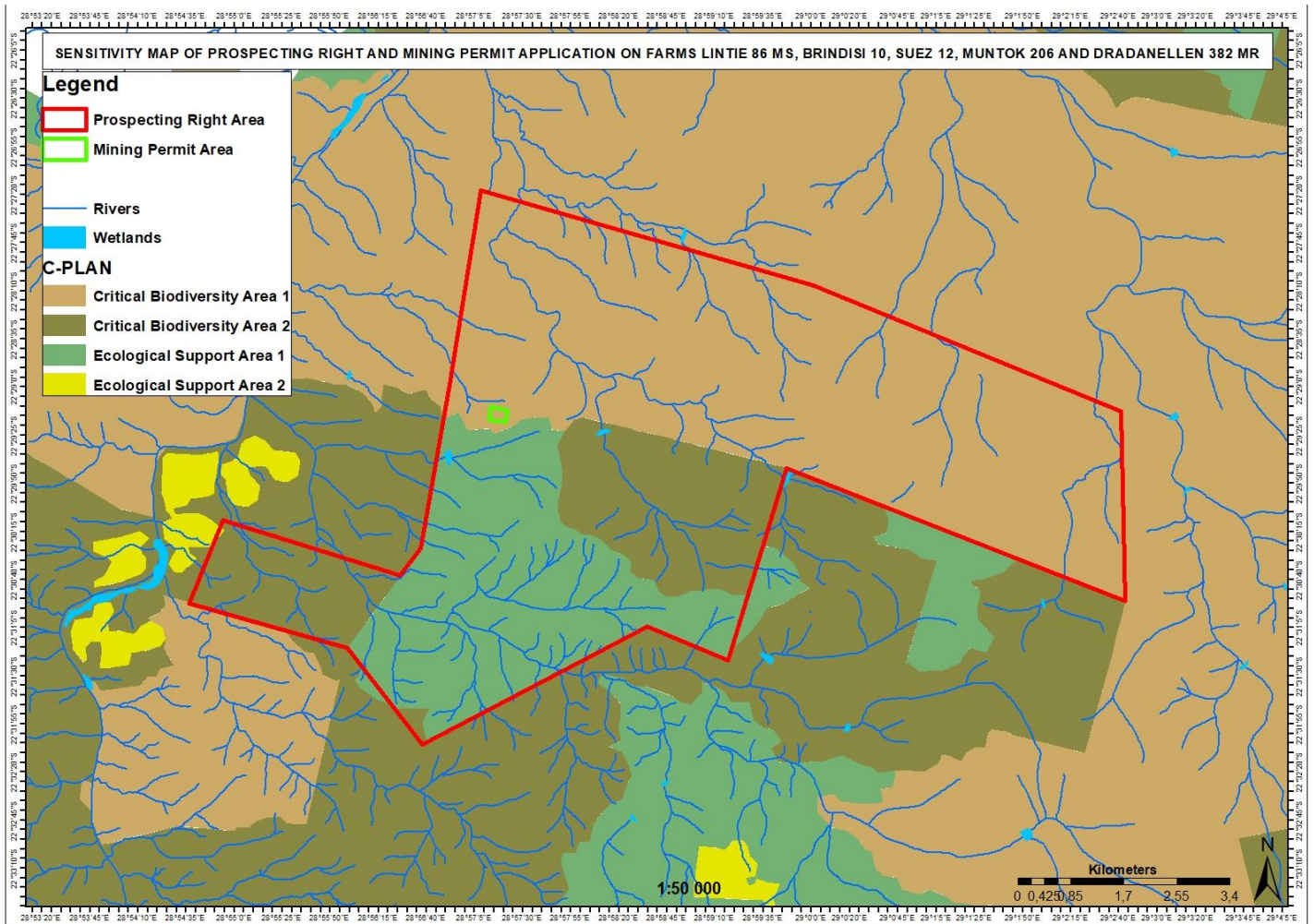


Figure 4: Water Resources map of the proposed site

Air Quality

Air quality is the degree to which the air in a particular place is free from pollution. Currently the main sources of impacts on air quality at site includes that of dust from gravel roads, farming machinery emissions and air pollution in the form of diesel exhaust fumes from vehicles. These impacts are however minimal. To minimise dust, vehicles speed on gravel road will be limited to 20 km/hr and dust suppression must be done on gravel road. All equipment's on site will be maintained in a good working order. On the mining area, to minimise the impacts of dust electronic blasting will be used as it is safe to use, causes less dust and noise impacts.

Noise

The sources of noise at the proposed area comes from the vehicle's movement from the surrounding farms and game farms or safaris. All the noise emanating from various sources will have minimal or no impact on the project.

Cultural and Heritage

Heritage sites and graves are considered to be highly significant. The proposed activities will not change/ alter or result in a significant impact on the area's heritage resources. There are no known cultural or heritage features in the application area. This report will be sent to the South African Heritage Agency for comments and input on the province or area's heritage sites.

Vegetation

The Project area is located within the Musina Mopane Bushveld (SVMP1. The Musina Mopane Bushveld is found in Limpopo Province on undulating plains from around Baines Drift and Alldays in the west, remaining north of the Soutpansberg and south of the Limpopo River (but also occurring to the north of Zimbabwe), through Musina and Tshipise to Malongavlake, Masis and Banyini Pan in the east. It is found on Altitudes of about 300m in the eastern Limpopo Valley up to 800m.

Vegetation and Landscape features associated with the SVMP1 vegetation type are extremely irregular plains with ridges and hills. Moderately open savanna with poorly developed ground layer. Umbrella-shape canopied *Kirkia acuminata* is prominent on

some ridge skylines with the often enormous *Adansonia digitata* on shallow calcerous gravel, the shrub *Catophractes alexandri* is dominant on calsilicate soils.

The vegetation unit is considered as Least threatened in terms of the conservation status. Approximately 19% with only 2% statutorily conserved in the Mapungubwe National Park as well as M+Nwanedi and Honnet Nature Reserved. Additionally, about 1% conserved in the Baobab Tree Reserve. Roughly 3% transformed, mainly by cultivation. Erosion is high to moderate.

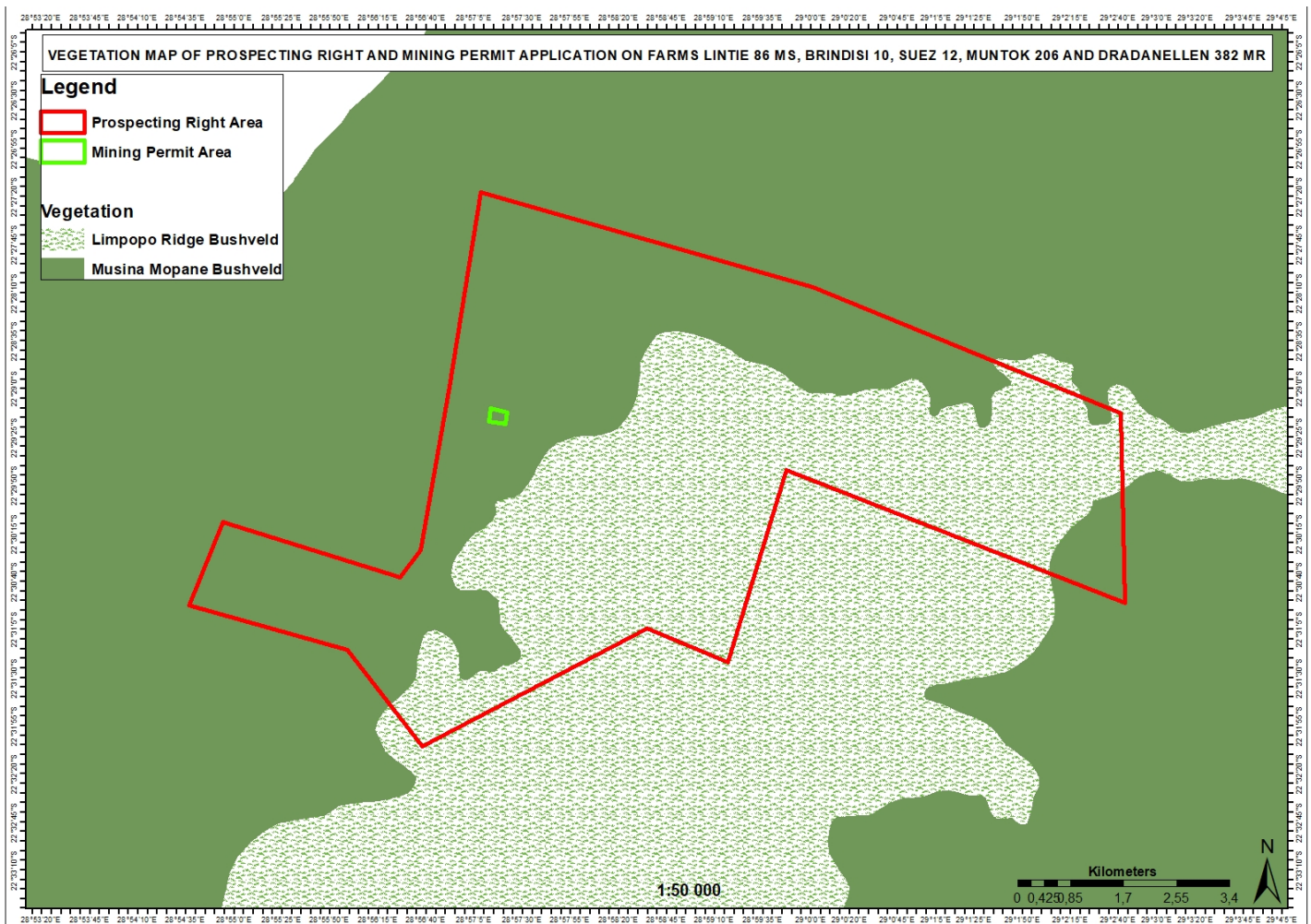


Figure 5: Vegetation map of the proposed site.

Fauna

According to the desktop study conducted, forty-eight species of mammal are known to occur or likely to occur within the region (Friedmann & Daly 2004, Skinner & Chimimba 2005, Monadjem et al. 2010), and the majority of these can be expected to occur within the study area, given the habitats available and the relatively untransformed nature of much of the study area.

There are few animals observed in and around the Project site, which includes impalas, Kudu's, Zebras and Blouwildebees to name a few and the proposed activities will have an impact on species like birds and other wild animals due to noise and destruction of habitat as a result of vegetation clearing. There will be no hunting and killing of animals on site to ensure preservation of the remainingthe area

Biodiversity

This Critical Biodiversity Areas (CBA's) are terrestrial and aquatic features in the landscape that are critical for retaining biodiversity and supporting continued ecosystem functioning and services (SANBI, 2007). These form the key output of a systematic conservation assessment and are the biodiversity sectors inputs into multi-sectoral planning and decision-making tools.

The primary purpose of CBA's is to inform land-use planning and the land-use guidelines attached to CBA's aim to promote sustainable development by avoiding loss or degradation of important natural habitat and landscapes in these areas and the landscape as a whole. CBA's can also be used to inform protected area expansion and development plans. The use of CBA's here follows the definition laid out in the guideline for publishing bioregional plans (Anon, 2008):

“Critical biodiversity areas (CBAs) are areas of the landscape that need to be maintained in a natural or near-natural state in order to ensure the continued existence and functioning of species and ecosystems and the delivery of ecosystem services. In other words, if these areas are not maintained in a natural or near- natural state then biodiversity conservation targets cannot be met. Maintaining an area in a natural state can include a variety of biodiversity-compatible land uses and resource uses”.

“Ecological support areas (ESA's) are areas that are not essential for meeting biodiversity representation targets/thresholds but which nevertheless play an important role in supporting the ecological functioning of critical biodiversity areas and/or in delivering ecosystem services that support socio-economic development, such as water provision, flood mitigation or carbon sequestration. The degree of restriction on land use and resource use in these areas may be lower than that recommended for critical biodiversity areas.”

The project area lies within a CBA1, meaning the area is near natural, this implies that the landscape is near to natural state and the Ecosystems and species are largely intact and undisturbed. These are areas with intermediate irreplaceability or some flexibility in terms of area required to meet biodiversity targets also there are options for loss of some components of biodiversity in these landscapes without compromising our ability to achieve targets.

Therefore, a Thorough Terrestrial and wetland delineation study is underway and the final results are attached on the specialist report on appendix A.1

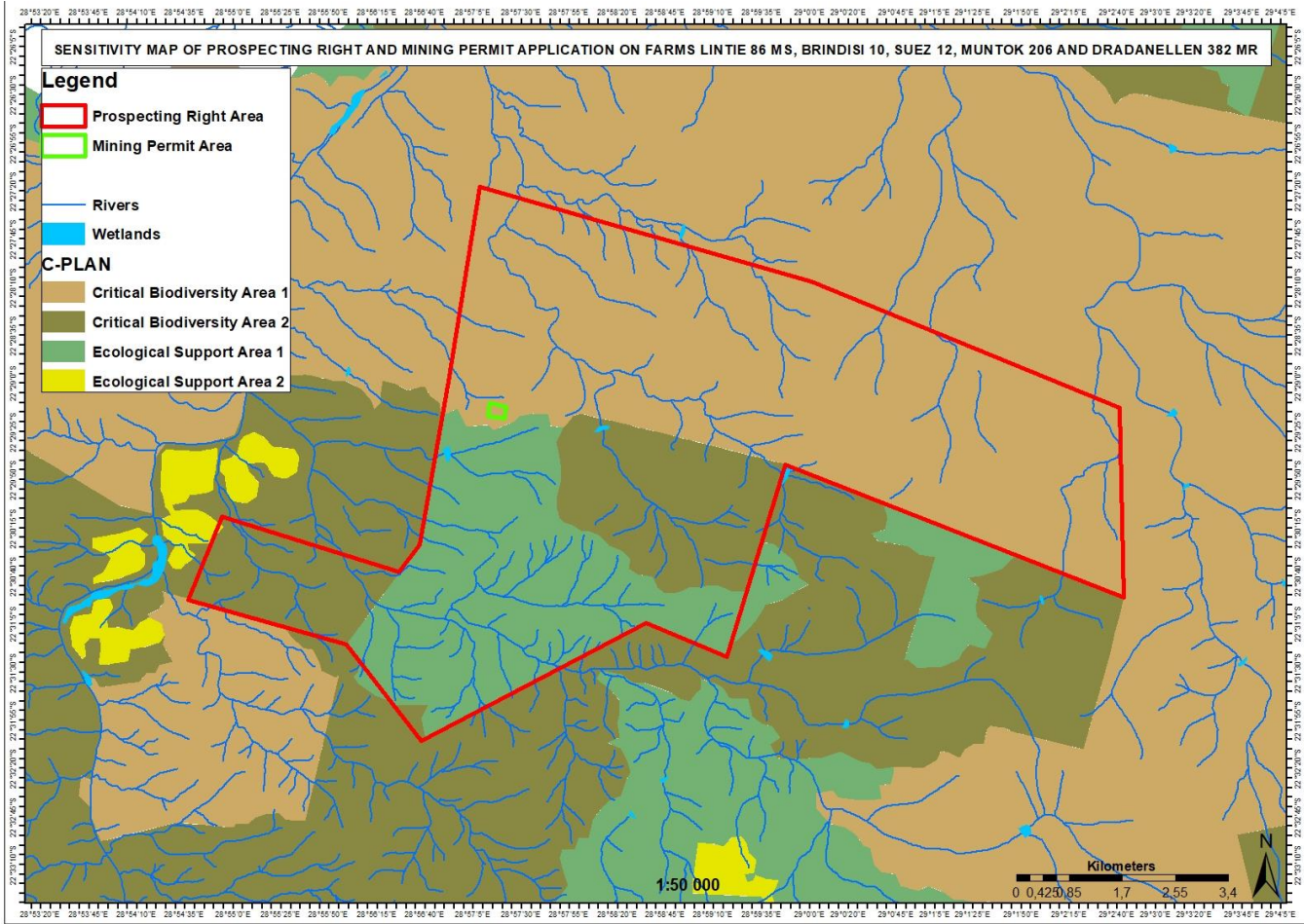


Figure 6: Environmental map showing the terrestrial and aquatic sensitivity of the site

Geology

Rocks of the Beit Bridge Complex (Zl) underlay large sections of the lower reaches of the Lephalala, Mogalakwena, and Sand River basins and to a lesser extent, the lower reaches of the Mokolo and Nzhelele River basins. It is part of the Central zone of the Limpopo Mobile Belt and represents a shelf-type supracrustal sequence consisting of a succession of metasedimentary and metavolcanic rocks. Based on lithology it is divided into the Mount Dove, Malala Drift and Gumbu Groups. Intrusives of Radium age includes the Messina Suite, Madiapala Syenite and the Alldays, Bulai, Sand River and Zoetfontein Gneisses.

The Alldays Bulai Gneiss occurs as large elongate or oval bodies of up to several kilometres in diameter and they consist of gneiss, banded gneiss, granite gneiss with infolded xenoliths of mafic to ultra-mafic material and migmatite associated with leucocratic granite and these are the main targets of exploration see figure 7 below.

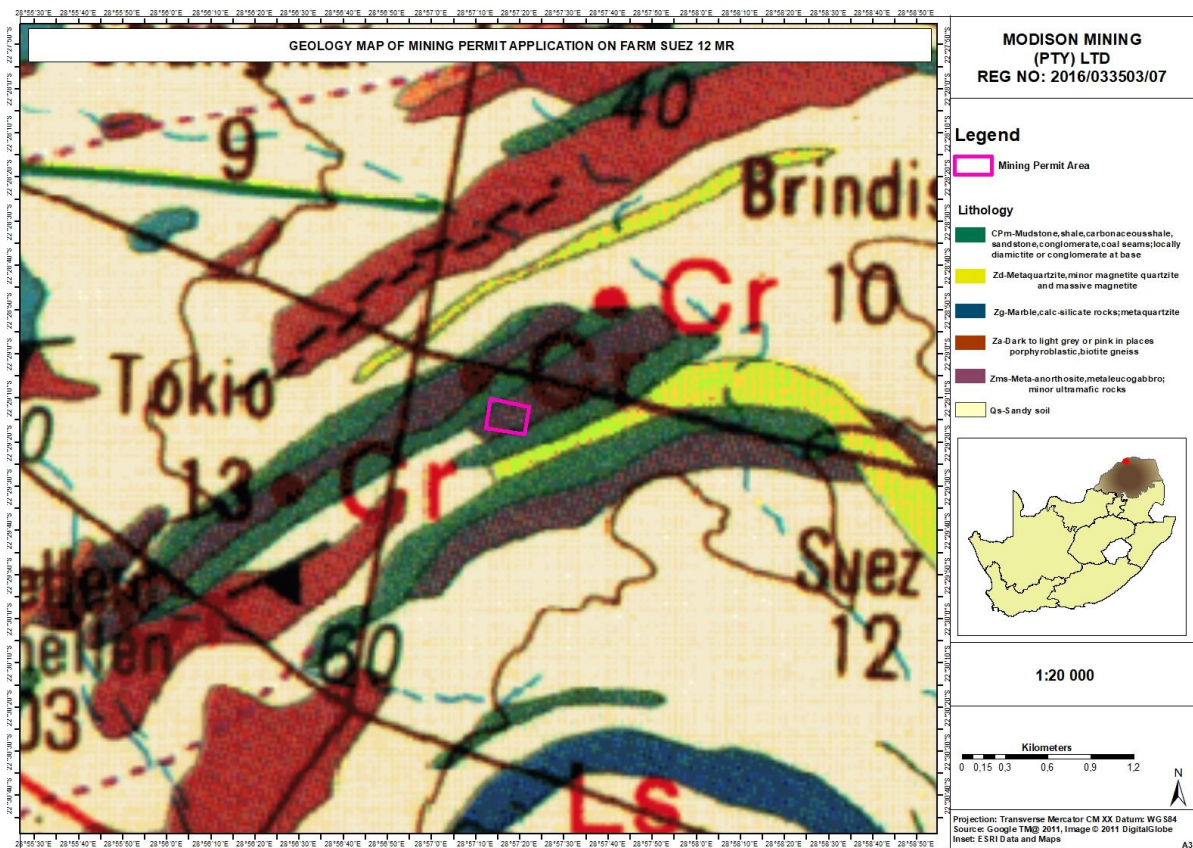


Figure 7: Geological map of the proposed site.

Soil, Land Use and Land capability

Vhembe district's land is primarily used for grazing. Cultivated Land is concentrated in South-Western and Eastern borders of the Vhembe District. There is also a small area of cultivated land in the North-eastern part of the Vhembe District along the border with Zimbabwe.

The district has got a total area of 2,140,708 hectares of which 249,757 hectares declared arable land, 1,227,079 hectares declared marginal land and 661,859 hectares declared non-arable land. The agricultural system is divided into two types i.e. Large-scale commercial farming and small-scale farming. 174,830 hectares arable land which is 70% is owned by white commercial farmers while small scale farmers which are black dominated own 74,927 hectares (30% arable land).

The agriculture is by far the most extensive land use in the Limpopo province. It takes many forms, including commercial dry land and irrigated cultivation, livestock

farming, game farming, as well as subsistence farming. The strong agricultural character also means that the province is considered to be predominantly rural.

The Project area was mainly used for game farms which are no longer in existence and there is farming on the far western side of the farm Dardenellan (See figure 8). Climatic conditions, water availability and soil conditions dictate the success of agriculture in the province. Of all the various soil characteristics, erodibility is the most critical to understand.

The erodibility of soils can be described as their sensitivity to the effects of wind and water on the soil structure. This property is expressed as an erodibility index, where low values indicate high susceptibility to erosion, and high values correspondingly indicate a low susceptibility to erosion.

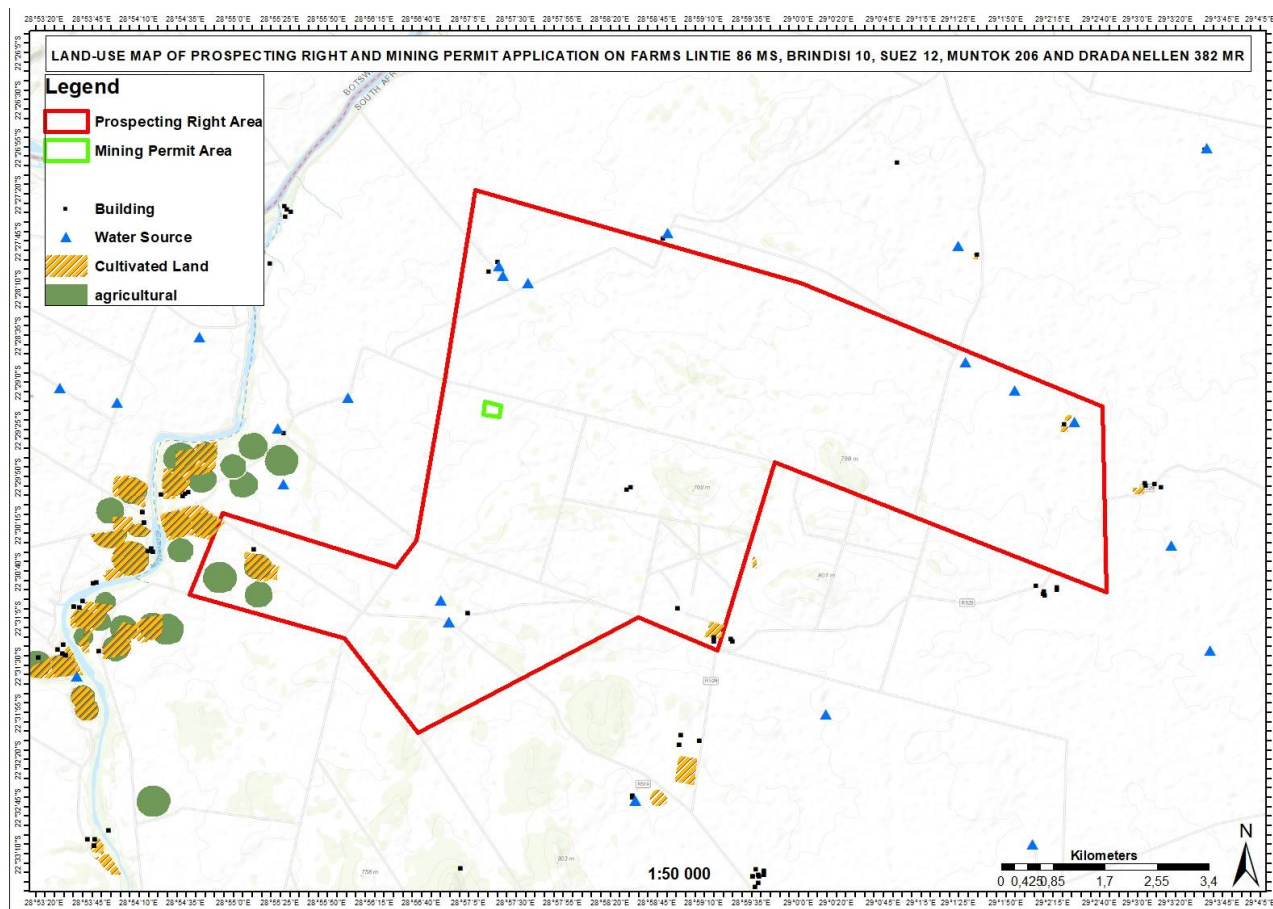


Figure 8: Land use map showing different land uses on site

The project area falls within two soil types . it comprises of eutric arenosols and

Chromic Cambisols (see figure 9). Arenosols are Soils with a loamy sand or coarser texture either to a depth of at least 100 cm from the soil surface, or to a (petro-) plinthic or salic horizon between 50 and 100 cm from the soil surface.

They contain less than 35 percent (by volume) rock fragments or other coarse fragments within 100 cm from the soil surface and have no diagnostic horizons other than an ochric, yermic or albic horizon.

Chromic Cambisols in undulating or hilly (mainly colluvial) terrain are planted to a variety of annual and perennial crops or are used as grazing land, most of the land in the project area are used for game farms which are currently non-operational although there are animals using the land for grazing.

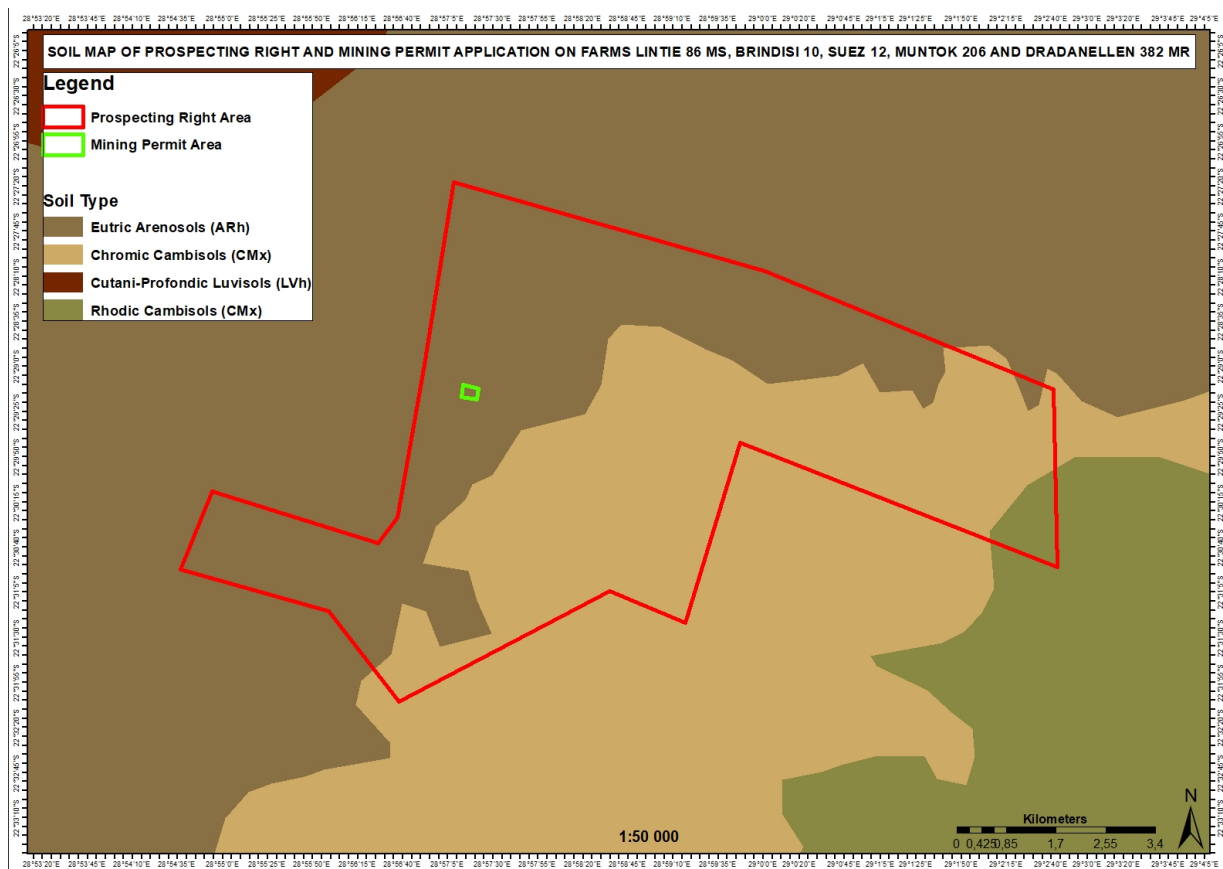


Figure 9: Soil type map of the proposed site

Socio-economic conditions.

The Musina Local Municipality is located within the Vhembe district municipality in the Limpopo Province and it covers 27 969 148 square km of land with total population of 1 393 949 people according to Stats SA, 2016 Community Survey. The district is located in the Northern part of Limpopo Province and shares borders with

Capricorn and Mopani District municipalities in the Eastern and Western directions respectively. The sharing of borders extends to Zimbabwe and Botswana in the North West and Mozambique in the south east through the Kruger National Park respectively

Limpopo Province is known to be the least urbanized province in South Africa so as to Vhembe District. Musina has the highest percentage urban at 53%, followed by Thulamela with 15%, Makhado with 8,6% and Collins Chabane with 3.8%.

The STATSSA (2016) reveals that the economy of Vhembe District comprises primary (agriculture and mining), secondary (electricity, construction and manufacturing) and tertiary (trade, transport, tourism, finance and community services) sectors. It has an open and integrated economy and is rich in strategic minerals and fertile agricultural land. A strong tourism base, mainly due to its unique landscape of fauna and flora as well as strategic location which makes it easy to access SADC markets, strengthens the economic backbone of VDM. Specific economic drivers identified in all the development nodes are listed below.

Population

According to Census 2011 and 2016, Vhembe district municipality shows that the Census reported a total population of 1 294 722 in 2011 and 1 393 950 for the District (Census, 2016), the recorded increase of 99 228 people represents a (7%) increase in the overall population when comparing the 2011 and 2016 census.

A growth rate of 7% was experienced in the District Municipality between 2011 and 2016 an annual growth of 0.7%. This positive growth rate indicates that more people are settling in the Municipality. Figure 8 shows that majority of population are located in Thulamela Local Municipality (36%), followed by Makhado Local Municipality (30%) followed by newly established Local Municipality of Collins Chabane (25%) and Musina (9%). (See figure 8).

Thulamela and Makhado Local Municipality has experienced a decrease in population between 2011 and 2020 due to the re-demarcation process which took place in 2016 and the establishment of Collins Chabane Local Municipality which affected the boundaries of Thulamela, Makhado and Musina and the former Mutale Local Municipality (see figure 10)

Overall Population				
Municipalities	Census 2011	%	Census 2016	% of
Thulamela LM	618 462	48%	497 237	36%
Musina LM	68 359	5%	132 009	9%
Makhado LM	516 031	40%	416 727	30%
Collins Chabane LM	No data available because municipality was established after Census 2011		347 975	25%
Vhembe DM	1 294 722	100%	1 393 950	100%

Population growth trends						
Municipalities	1996	2001	% Change	2011	% change	2016
Vhembe	1 095 728	1 197 952	1.8	1 294 722	0.8	1 393 948
Thulamela	533 757	581 487	1.7	618 462	0.6	497 237
Musina	33 061	39 310	3.5	68 359	5.5	132 009
Makhado	455 597	494 264	1.6	516 031	0.4	416 728
Collins Chabane	There is no data available because municipality was established after Census 2011					347 974

Figure 10: Population distribution by municipality & population growth trends in the VDM

Musina Local municipality

The Musina Municipality is located in the northern part of the Limpopo Province and falls within the jurisdiction of the Vhembe District Municipality. The Limpopo river, the north of the Musina Municipality, forms the northern border, separating South Africa from Zimbabwe and Botswana.

Statistics South Africa reported that the population of Musina grew from 68 359 in 2011 to 132 009. This represent an overall increase of 63 650 population since 2011. This is a massive increase in population in contrast of most South African Municipalities. This increase is due to the re-demarcation process where part of the former Mutale Municipality boundary is now falling within Musina.

The municipality is generally a rural municipality with Musina Town as the main administrative centre. It has a number of smaller rural villages and settlements. Musina town accommodates most of the commercial, service and administrative activities of the Municipality and the immediate surrounds. It serves as a primary shopping destination and place for medical treatment and other amenities for the rural population as well as for Zimbabweans. The Municipality consist of 81 villages.

Poverty and unemployment

Learners in the Vhembe schools are mainly from poor rural communities. The poverty has been exacerbated by the high rate of unemployment and inequality. Vhembe District Municipality had the lowest labour force participation rate of 44.2% in 2018, this increased from 36.8% in 2008. Vhembe District Municipality had the lowest unemployment rate of 16.1% in 2018, which decreased from 27.7% in 2008.

Unemployment rate in the District means more dependence on the State which flows into provision of education, amongst other services. Children from these families will continue to benefit from 'No Fee' schools' policy, National School Nutrition Programme and Scholar transport. These put a lot of pressure on the Department's resources for example, 894 (97.3%) schools in public Vhembe schools are benefitting from National School Nutrition Programme

24% of female out of 42% people have no income compare to 18% of male in the district as indicated in table 3.14 below. Income inequality by gender in the district has to be reduced drastically to realize the United Nation-Sustainable Development Goal (UN-SDG), of reducing inequality by 2030. 8% of female have income between R 801-R 1 600 compared to 2% of male in the district. This depicts that female income is less than male which perpetuate gender income inequality.

Table 3.14 Individual monthly income by gender per percentage for person weighted, DC34: Vhembe			
	Male	Female	Total
No income	18	24	42
R 1 - R 400	14	14	28
R 401 - R 800	2	3	4
R 801 - R 1 600	5	8	13
R 1 601 - R 3 200	2	1	3
R 3 201 - R 6 400	1	1	2
R 6 401 - R 12 800	1	1	2
R 12 801 - R 25 600	1	1	1
R 25 601 - R 51 200	0	0	0
R 51 201 - R 102 400	0	0	0
R 102 401 - R 204 800	0	0	0
R 204 801 or more	0	0	0
Unspecified	2	2	4
Not applicable	1	0	1
Grand Total	46	54	100
Source: Stats SA, Community Survey ,2016			

Figure 11: Table showing the income distribution in the VDM

905 880 (70%) of population in the district live under food poverty line with income below R561.00, while 54 085 (4%) people lower-bound line below R810.00 income and 166 484 (13%) people upper bound line below R1 227.00 as indicated in Table 3.15 below. Extreme Poverty in all forms must be ended by 2030 in terms of UN-SDG. There is high percentage (70%) of people living under food poverty line in the district as indicated below.

Employment creation is vital in the rural areas and rural towns of the province. It goes without saying that the main task of government is to facilitate business investment, growth and development to create these jobs. The economic sectors of growth and opportunity in the province should be targeted, namely: agriculture, mining, manufacturing, trade, finance and business services, general government services and construction. The success of this exploration campaign will definitely assist the social condition of this municipality provided that this project leads to an economical viable mining project

(b) Site Accessibility

The proposed area is located approximately 25 km north west of the town Alldays, there are existing unnamed roads that give access to the proposed site. The site can be accessed through the main gravel road and smaller roads leading to the site and inside the farms, they connect with a tarred road R572 which leads to the town of all days. Due to the availability of road networks on site, there will be no road construction for this proposed project.

(c) Description of current land uses.

Land use is defined as the operations carried out by humans on the land surface, with the intention to obtain products or benefits through using land resources. This can be simplified as the purpose the land serves. Land uses varies according to places and according to zoning. Some of the land uses includes settlement, agriculture, mining, retail etc. The mainland-use on site is the grazing land for animals and livestock, natural grassland, open woodland and low shrubland covering a bigger area for the site. Few farmhouses used for settlement where observed during site visit. Most of the land adjacent to the proposed site is used for safaris or game farming,

(d) Description of specific environmental features and infrastructures on the site.

The only prominent infrastructures noted on site during site visit are;

- gravel road networks;
- Farm houses & fences
- Safaris that are closed (Chataronga safaris & stenley Pieterse safaris)
- Windmills
- Boreholes & water wells for animals
- Cattle's kraals

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

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

This section provides the detailed methodology used for the assessment of the significance of potential environmental impacts in the study. This methodology allows for the identified potential impacts to be analysed in a systematic manner, with significance rating (from insignificant to very high) assigned to each potential impact. The significance of an impact is defined as a combination of the consequence of the impact occurring and the probability that the impact will occur. The criteria used to determine impact consequence include extent, intensity and duration of the impact and are presented below.

Table 7: Criteria used to determine the consequence of the impacts.

Nature of the Impact (N)		
Positive	+ (ve)	Impact will be beneficial to the environment (a benefit).
Negative	- (ve)	Impact will not be beneficial to the environment (a cost).
Neutral	0	Where a negative impact is offset by a positive impact, or mitigation measures, to have no overall effect.
Magnitude (M)		
Minor	2	Negligible effects on biophysical or social functions/processes. Includes areas/environmental aspects which have already been altered significantly, and have little to no conservation importance (negligible sensitivity*).
Low	4	Minimal effects on biophysical or social functions/processes. Includes areas/environmental aspects which have been largely modified, and/or have a low conservation importance (low sensitivity*).
Moderate	6	Notable effects on biophysical or social functions/processes. Includes areas/environmental aspects which have already been moderately modified, and have a medium conservation importance (medium sensitivity*).
High	8	Considerable effects on biophysical or social functions/processes. Includes areas/environmental aspects which have been slightly modified and have a high conservation importance (high sensitivity*).
Very high	10	Severe effects on biophysical or social functions/processes. Includes areas/environmental aspects which have not previously been impacted upon and are pristine, thus of very high conservation importance (very high sensitivity).

Extent (E)		
Site only	1	Effect limited to the site and its immediate surroundings.
Local	2	Effect limited to within 3 - 5 km of the site.
Regional	3	Activity will have an impact on a regional scale.
National	4	Activity will have an impact on a national scale.
International	5	Activity will have an impact on an international scale.
Duration (D)		
Immediate	1	Effect occurs periodically throughout the life of the activity.
Short term	2	Effect lasts for a period 0 to 5 years.
Medium term	3	Effect continues for a period between 5 and 15 years.
Long term	4	Effect will cease after the operational life of the activity either because of natural process or by human intervention.

Permanent	5	Were mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.
Probability of Occurrence (P)		
Improbable	1	Less than 30% chance of occurrence.
Low	2	Between 30 and 50% chance of occurrence.
Medium	3	Between 50 and 70% chance of occurrence.
High	4	Greater than 70% chance of occurrence.
Definite	5	Will occur, or where applicable has occurred, regardless or in spite of any mitigation measures.

Once the impact criteria have been ranked for each impact, the significance of the impacts will be calculated using the following formula:

$$\text{Significance Points (SP)} = (\text{Magnitude} + \text{Extent} + \text{Duration}) \times \text{Probability}$$

The significance of the ecological impact is therefore calculated by multiplying the severity rating with the probability rating. The maximum value that can be reached through this impact evaluation process is 100 SP (Points). The significance for each impact is rated as High (SP ≥ 60), Medium (SP = 31 - 60) and Low (SP < 30) significance as shown in the below.

Table 8: Significance rating of positive and negative impacts.

Significance of Predicted NEGATIVE Impacts		
Low	0 - 30	Where the impact will have a relatively small effect on the environment and will require minimum or no mitigation and as such have a limited influence on the decision.
Medium	31 - 60	Where the impact can have an influence on the environment and should be mitigated and as such could have an influence on the decision unless it is mitigated.
High	61 - 100	Where the impact will definitely have an influence on the environment and must be mitigated, where possible. This impact will influence the decision regardless of any possible mitigation.

Significance of Predicted POSITIVE Impacts		
Low	0 - 30	Where the impact will have a relatively small positive effect on the environment.
Medium	31 - 60	Where the positive impact will counteract an existing negative impact and result in an overall neutral effect on the environment.
High	61 - 100	Where the positive impact will improve the environment relative to baseline conditions.

1.8.1 Impacts and risk identified including the nature, significance consequence, extent, duration and probability of the impacts, including the degree of these impacts.

Table 9: Impact assessment and rating table

Activity	Aspect	Impacts	Nature of the Impact (N)	Magnitude (N)	Extent (E)	Duration (D)	Probability (P)	Significance before mitigation	Mitigation Measures	Magnitude (M)	Extent (E)	Duration (D)	Probability (P)	Significance After Mitigation
CONSTRUCTION PHASE														
Site Clearing	Fauna	Habitat loss and destruction due to the clearing of vegetation.	-(ve)	6	2	3	5	55	Areas to be cleared must be clearly marked and clearing of vegetation must only take place within the demarcated areas. (Operation footprint)	4	2	2	3	24
	Flora	Site clearing leads to the introduction of invasive species on site and the loss of indigenous plants.	-(ve)	6	2	3	5	55	<ul style="list-style-type: none"> control alien invasive plant species during all phases of the operation. Avoid removal of indigenous tree species. 	2	1	2	4	20

	Visual impacts	Stockpiles which will be made will disturb/alter the overall perception of the site.	-(ve)	6	2	2	5	50	Stockpiles should be kept to a minimum height of >3m.	2	1	2	3	15
	Soil and Land capabilities	Soil erosion may occur due to loss of vegetation	-(ve)	6	2	2	5	50	Clearing of vegetation must only be done within demarcated areas to minimise soil erosion area	2	1	4	4	28
	Air Quality	Dust will be generated due to the movement of heavy machineries and vehicles working on site.	-(ve)	6	2	2	5	50	Dust suppression must be done on site to reduce or minimise the generation of dust.	2	1	4	4	28
Movement of machinery and Vehicles in and around the site.	Air Quality	Dust will be generated due to the movement of heavy machineries and vehicles working on site. Emissions of gases like carbon monoxide from vehicles and machineries will cause air pollution	-(ve)	6	2	2	5	50	Dust suppression must be done on site to reduce or minimise the generation of dust. Vehicles & machineries should be serviced regularly to minimise the release of carbon monoxide or any harmful gases.	2	1	4	4	28

Soil and Land capabilities	Potential Soil contamination due to oil and diesel spillages from vehicles.	-(ve)	6	2	2	5	50	Drip trays should be placed under parked vehicles at all times to contain potential oil drips/spills. Vehicles should be serviced regularly to minimise leaking of oils.	2	1	4	4	28
Surface and Groundwater	Groundwater, surface water contamination from oil and diesel spillages from machineries and vehicles.	-(ve)	6	2	2	3	30	Place drip trays under parked vehicles and machineries to avoid soil contamination by potential oil and diesel leakages.	2	1	2	3	15
Fauna	Accidental killings of small animals on site.	-(ve)	6	2	2	5	50	Vehicles should utilise designated/existing roads on site.	2	1	4	4	28

		where mining is taking place as part of looking for job opportunities.							transport for those people to come to work.					
	Waste management	Improper waste management and disposal may cause soil contamination, littering (visual impact), and ground water contamination	-(ve)	6	2	3	5	45	<ul style="list-style-type: none"> Separate and store waste according to their classifications (hazardous and general waste) General waste must further separated by providing marked or color-coded bins for paper, plastic, PPE, steel, food bins, etc). The hazardous waste such as used oil and grease must be contained in bunded containments with a capacity of at least 110% capacity of the substance stored Place bins around the site to encourage employees not to litter Place "No Littering" signs around the site 	2	2	2	4	24

									<ul style="list-style-type: none"> Dispose the general waste at a registered municipal site Keep a disposal certificate of any hazardous waste or contaminated soil disposed of. 					
Top soil, overburden and Waste rock stockpiling	Soil erosion from stockpiles	During heavy rains or strong winds, soil erosion may occur	-(ve)	6	2	2	5	50	Avoid erosion by stockpiling topsoil properly (right slope and height) and keep stockpile damp during windy period to reduce erosion by wind.	2	2	2	4	24
	Visual Impacts	Stockpiles alter the overall perception of the site.		6	2	2	4	40	<ul style="list-style-type: none"> Stockpile height must not exceed 3m The stockpiles must be used to backfill the pits to reduce during concurrent rehabilitation to reduce visual impacts 	2	2	2	4	24

Erection of surface infrastructures	Soil and Land	Loss of topsoil and nutrients in an area where the surface infrastructures will be erected.	-(ve)	4	2	2	4	32	Where soil nutrients and/or fertility has been lost, the soil should be fertilized to recovercultivation capacity during rehabilitation.	2	1	2	2	10
REHABILITATION/CLOSURE PHASE														
Rehabilitation of the disturbed and contaminated areas.	Flora	Revegetation of areas where vegetation was disturbed to restore ecosystem function and integrity.	+(ve)	6	1	2	3	27	All areas that have been damaged by mining activities should be rehabilitated immediately after activities ceases to aid revegetation and restore ecosystem function and integrity. Reap the surface to encourage revegetation, where required fertilize the soil.	8	2	3	5	65
	Visual Impact	<ul style="list-style-type: none"> Removal of all infrastructures onsite. 	+(ve)	6	1	2	4	36	<ul style="list-style-type: none"> Remove all things which were not there prior mining (vehicles, equipment, waste, etc) from the site. 	8	2	4	5	70

		<ul style="list-style-type: none"> Removal of stockpiles. 												
	Soil and Land	<ul style="list-style-type: none"> Oil spills should be cleaned up and disturbed area rehabilitated and monitored. Closing of excavated pits onsite. 	+(ve)	6	1	2	3	27	<ul style="list-style-type: none"> The stockpiles must be used to close up all pits on the site. Clean up and remove any spills and contaminated soil on site. All excavated pits must be closed post all mining activities to encourage revegetation 	8	2	3	5	65
	Ecosystem function and visual aspect	Lack of or improper rehabilitation may lead to impact on ecosystem functionality and visual impacts.	-(ve)	4	2	2	4	32	<ul style="list-style-type: none"> Provide for financial provision as required Revised and provide for financial provision shortfall annually. 	2	1	2	2	10

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

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

Table 10: Positive and negative impacts of the project.

Positive Impacts from the proposed activity	Negative Impacts from the proposed activity
Local Market Boost: new market to local suppliers of different goods will be opened to local business people.	Noise: will be generated from the movement of vehicles and operation of machineries.
Good environmental management: All potential impacts that will be generated from the development of the project will be managed through the implementation of the EMP.	Removal of vegetation: for the purpose of site establishment and mining
Employment opportunities both from the mine as well as local market	Habitat destruction: by removing the vegetation in the mining area.
	Change in land capability: Mining activities will have impact on the land capability; however, mitigation measures are in place to reduce the intensity of the impact.
	Generation of Dust: due to the nature of the road that will be used (gravel) and the openpit mine activity, there will be dust generation.
	Groundwater Contamination; Potential oil and diesel spillages may lead to the contamination of groundwater.

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

(With regard to the issues and concerns raised by affected parties provide a list of the issues raised and an assessment/discussion of the mitigations or site layout alternatives available to accommodate or address their concerns, together with an assessment of the impacts or risks associated with the mitigation or alternatives considered).

Please refer table 9 above for a full description of the Impact Assessment including mitigation measures.

1.8.8 Motivation where alternatives sites were used.

The selected/preferred site, activities and technology to be used is chosen based on the activity planned (mining), attributes of the underlying geology of the area and the type of mineral to be mined.

1.8.9 Statement motivating the alternative development location within the overall site.

(Provide a statement motivating the final site layout that is proposed)

The preferred site is based on the desktop analysis of the geology of the area. The site is potentially underlain by reserves of the ore bearing Alldays Bulai Gneiss which occurs as large elongate or oval bodies of up to several kilometres in diameter and they consist of gneiss, banded gneiss, granite gneiss with infolded xenoliths of mafic to ultra-mafic material and migmatite associated with leucocratic granite and these are the main targets of exploration

1.9 The full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site (In respect of the final site layout plan) through the life of the activity.

(Including (i) a description of all environmental issues and risks that identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.)

The potential impacts were identified during the site visit and through literature review of the same activities. The receiving environment and its surroundings were assessed and studied to understand all natural (and social) features that would be affected by the proposed development. The generic criteria and systematic approach used to identify, describe and assess impacts as outlined in this report is stated in section 1.8.5, this was done in order to determine the significance of each activity rated.

Interested and affected parties as well as landowners are consulted and notified of the proposed project to ensure that they exchange any information pertaining to the environment that may be of great importance to the attention of the EAP compiling the report.

1.10 Assessment of each identified potentially significant impact and risk

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

Refer to **table 9** above for the Identified Potential Significant Impacts and Risks.

1.11 Summary of specialist reports

The specialist studies are currently underway

1.12 Environmental Impact statement

1.12.1 Summary of the key findings of the environmental impact assessment.

The basic assessment illustrates that there are various potential negative and positive impacts that may arise as a result of the proposed project. As per the impact assessment, the negative impact ratings are low after application of the mitigation measures and there are also socio-economic positive impacts that will come with the project. This is a positive impact that will help improve the livelihoods of the members of the nearest community around the project site by providing an additional means of generating income.

The pre-mitigation Medium-significance rated negative impacts include the destruction and disruption of the natural environment, dust generation and noise generation. Dust generation needs to be strictly managed as the site is surrounded mainly by safaris, cultivated land and homesteads, therefore the deposition of dust on the cultivation could have serious implications on the agricultural produce on the neighboring farm portions. In addition to that, dust and noise can have negative impacts (nuisance to medical) on the land occupiers near the site, and need to be managed accordingly as well and thus electronic blasting is recommended to drastically manage the noise and dust impacts during operational phase

It is also important that concurrent rehabilitation is practiced during the operation of the mine so as to reduce the chances of erosion (especially during the rainy season when there are great chances of exposed and loosened soil to be washed off by runoff). Overall, the project will have minimal negative impacts on the environment and the surrounding

land occupiers if all impacts are managed properly, and will instead positively impact the livelihood and economy of local communities.

1.12.2 Site Map

The proposed site plan is attached as figure 2

1.12.3 Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

The significant positive potential impacts identified include job creation. The negative impacts include dust emission, noise generation, habitat disruption, animal life disruption, removal of vegetation, possible contamination of soil & water, immigration of job seekers, and soil erosion. All these impacts were assessed and rated for their significance, impacts and mitigation measures are outlined on table 9 above.

1.13 Proposed mitigation management objectives and the impact management outcomes for inclusion in the EMPr;

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

The objective of the identified mitigation measures is to ensure that the impacts are minimised or avoided as much as possible. Where impacts cannot be avoided, mitigation or rehabilitation measures are to be implemented during operational and closure phase respectively. All the potential (negative) impacts identified have been assessed and found to be of medium to low significance and after applying the mitigation measures, the impacts get even lower.

1.14 Aspects for inclusion as conditions of authorisation.

- Existing access routes must be used to access the site. The access routes should be maintained to ensure that other users are not affected by the use of the routes for the development.
- The project area and access routes must be sprayed with water to manage dust and dust mask provided to the employees.
- Ensure there is rehabilitation and re-vegetation upon cessation of mining activities.
- Concurrent rehabilitation must be carried out throughout the life of the mine to ensure that erosion of the exposed and denuded mined areas is minimised.
- Ensure that steep slopes area is graded for safety after mining.

- Ensure that the mining activities cause minimal disturbance to the neighbouring farmers. This is a very sensitive issue as some of the farmers live within close proximity.
- Provide complaints register to record and manage complaints from neighbours.

1.15 Description of any assumptions, uncertainties and gaps of knowledge.

(Which relate to the assessment and mitigation measures proposed)

It is assumed that the all the aspects of the environment were observed during the site assessment and that the desktop information is correct.

1.16 Reasoned Opinions as to whether the proposed activity should or should not be authorized.

1.16.1 Reason why the activity should be authorized or not.

The project must be authorized because

- Chrome ore is a very important mineral in the economy and in high demand
- The proposed project will create few jobs for the local people for the duration of the project (Two (2) years with a potential renewal period of Three (3) years making it a total of Five (5) years.
- The impact rating is medium low with the application of the mitigation measures
- Electronic blasting will be used as it is deemed to be progressively forming an integral part of safe, productive, and environmentally conscious blasting in the South African mining industry
- Concurrent rehabilitation will aid in vegetation establishment while the other area is still being mined and ultimately aid in ensuring success of final rehabilitation and closure.

1.16.2 Conditions that must be included in the authorization

- See item 1.14 above

1.17 Period for which the Environmental Authorisation is required.

The Environmental Authorisation is required for the period of the mining permit validity which is normally Two (2) years and an additional Three (3) years for the renewal period.

1.18 Undertaking

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

The undertaking required to meet the requirements of this section is provided at the end of the EMPr and is applicable to both the Basic Assessment report and the Environmental Management Plan. And has been put in the EMPr section below.

1.19 Financial Provision

The financial provision estimated for year one (1) is **R 92,745.63**

1.19.1 Explain how the foresaid amount was derived

The amount was calculated using the 2022 DMRE rates for quantum calculation.

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

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

It is confirmed that the amount is provided from operating expenditure.

1.20 Specific information required by the competent authority.

No specific information required by the competent authority

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

a) Impact on socio-economic conditions of any directly affected person.

(Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any directly affected person including the landowner, lawful occupier, or, where applicable, potential beneficiaries of any land restitution claim)

There are land occupiers close to the proposed site, but measures have been put in place to mitigate impacts that might arise due to the activities on site.

b) Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act

(Provide the results of Investigation, assessment, and evaluation of the impact of the mining, bulk sampling or alluvial diamond prospecting on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) with the exception of the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act, attach the investigation report as Appendix 2.19.2 and confirm that the applicable mitigation is reflected in 2.5.3; 2.11.6. and 2.12. herein).

No archaeological features have been recorded in the area applied for, however, should anything of archaeological or cultural value be identified, should any heritage important artifact be identified on site, work will stop immediately and heritage specialist will be appointed to conduct the assessment.

The project area is in the buffer zone of the Mapungubwe national park.

1.21 Other matters required in terms of sections 24(4) (a) and (b) of the Act.

*(The EAP managing the application must provide the competent authority with detailed, written proof of an investigation as required by section 24(4)(b)(i) of the Act and motivation if no reasonable or feasible alternatives, as contemplated in sub-regulation 22(2)(h), exist. The EAP must attach such motivation as **Appendix**).*

No other matters required in terms of sections 24(4) (a) and (b) of the Act.

PART B: ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPR)

2.1 Details of EAP

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

It is confirmed that the requirements for the provision of the details and expertise of the EAP are already included in PART A, section 1.1-1.2.

2.2 Description of the aspects of the activity

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

It is confirmed that the requirement to describe the aspects of the activity that are covered by the draft environmental management programme are already included in PART A.

2.3 Composite Map

(Provide 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 should be avoided, including buffers)

The composite map is attached as figure 13 below.

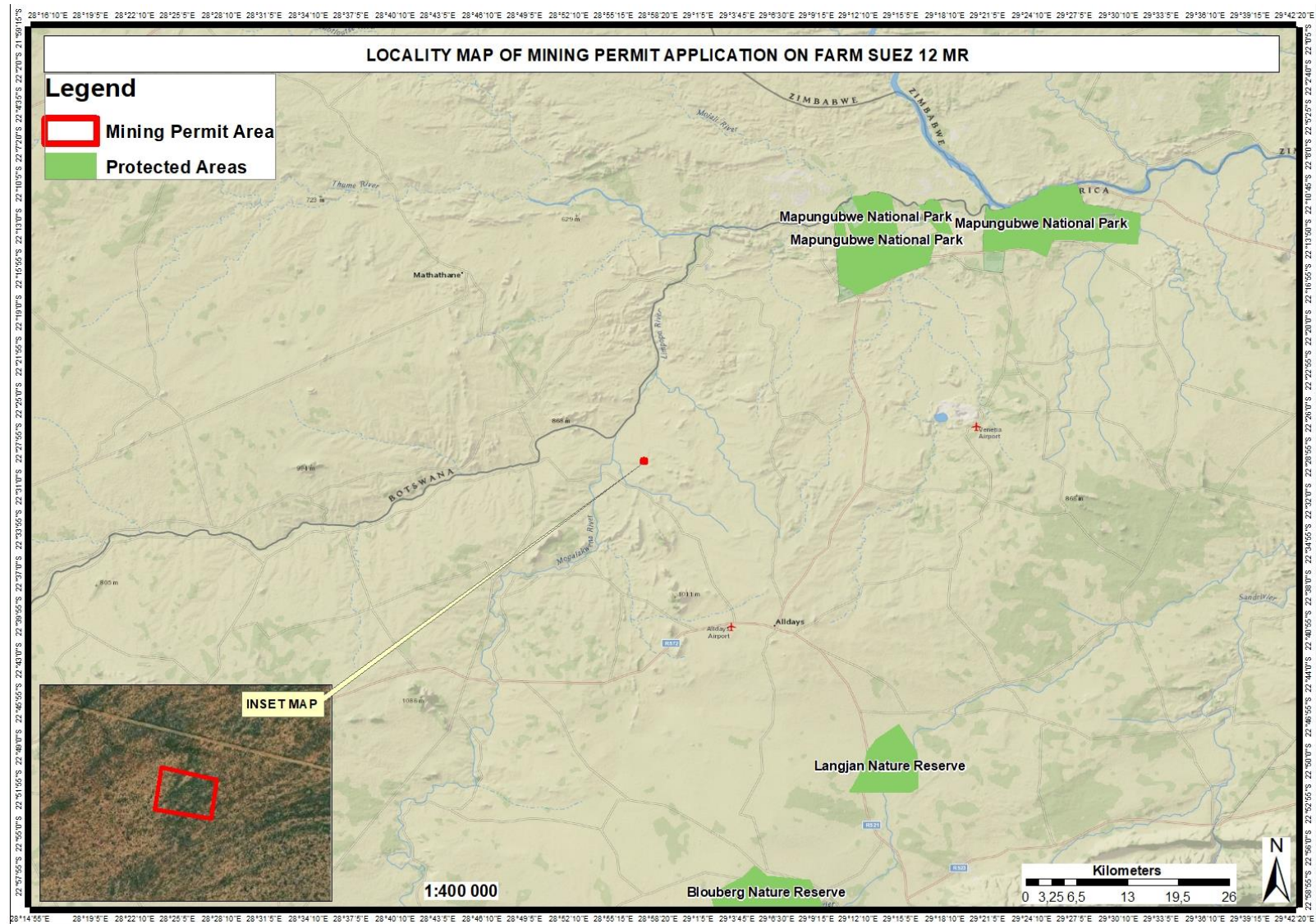


Figure 12: Location of the project site in relation to the Maphungubye National park

2.4 Description of impacts management objectives including management statements

2.4.1 Determination of closure objectives

(Ensure that the closure objectives are informed by the type of environment described)

The main objective of closure is to rehabilitate and return the affected areas/land to a state that it can be useful again, as close to the current state as possible. This will involve closing of pits and revegetation of affected areas to allow the natural state of the land to occur.

The overall goal for closure of the mining site is to ensure that the land is stable and safe in the long-term. For post closure, the disturbed area will be rehabilitated. All waste types will be removed and disposed properly. No rubble or domestic waste will be left lying in and around the site.

This objective and goal will be realized by:

- Ensuring that all temporary infrastructure left on-site are removed and ensure environmental and safety risks are minimised;
- Rehabilitating areas disturbed by mining activities;
- Ensuring that rehabilitated areas do not pose safety hazard to humans and animals;
- Establishing a self-sustaining and stable vegetation cover over the area disturbed by the mining activities;
- Control the establishment of alien vegetation during all phases of the proposed project;
- Ensuring that the rehabilitated landform is free draining; Protecting the drainage lines; and
- Ensuring adherence to local, provincial and national regulatory requirements.

2.4.2 Volume and rate of water use required for the operation

Water will be bought from a registered water supplier and delivered onsite. If buying is not sustainable, the applicant/holder of the mining permit will obtain a General Authorisation from the Department of Water and Sanitation for obtaining water from the borehole onsite.

2.4.3 Has a water use license been applied for?

The water use license will not be applied for this operation. Water will be bought from a registered water supplier and delivered onsite. If buying is not sustainable, the applicant/holder of the mining permit will obtain a General Authorisation from the Department of Water and Sanitation for obtaining water from the borehole onsite.

2.5 Impacts to be mitigated in their respective phases

Table 11: Measures to rehabilitate the environment affected by undertaking the activity

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
Clearing of vegetation and movement of vehicles for site establishment	Generation of Dust	Air quality-dust	Construction	5 ha	Dust suppression using water will be under taken to manage dust emitting from vegetation removal.	Compliance with Ambient air quality Standards	Throughout the life cycle of the mine.	To remain within air quality ambient level
	Increased noise levels from movement of vehicles	Noise	Construction	5 ha	Trucks, machinery, and equipment must be regularly serviced to reduce noise levels	Compliance with Ambient Noise Standards	Throughout the life cycle of the mine	To remain within ambient noise level
	Destruction of archaeological remains and unidentified graves.	Cultural Heritage	Construction	5 ha	Burial sites must be plotted, clearly marked and must be protected/barricaded to avoid accidental damage	Compliance with cultural heritage standards	During construction phase	Protection of cultural heritage sites

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
					<p>During prospecting activities Custodians must be involved in any mitigation work to their family burial sites</p>			
	Disruption and destruction of animal life	Fauna	Construction	5 ha	<p>No wild animal may under any circumstance be handled, removed or be interfered with.</p> <p>No wild animal may under any circumstance be hunted, snared, captured, injured or killed.</p> <p>No wild animal may under any circumstance be</p>	Compliance with conservation of wild life Standards	Throughout the life cycle of the mine	Prevent and protect and conserve the lives of fauna

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
					<p>hunted, snared, captured, injured or killed.</p> <p>Remove and dispose of any snares or traps found on or adjacent to the site.</p>			
Clearing of vegetation and movement of vehicles for site establishment	Disruption and destruction of vegetation	Flora	Construction	5 ha	<p>Do not disturb, deface, destroy or remove plants or natural features outside the demarcated area.</p> <p>No open fires are permitted under trees and novegetative matter may be removed for firewood.</p> <p>Locate construction camps on the outside fringe of the riparian vegetation zone.</p>	Compliance with conservation of wild life Standards	Throughout the life cycle of the mine	Prevent and protect and conserve the lives of flora

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
					Where damage to protected plants and natural features is a problem, then these should be fenced for protection.			
Clearing of vegetation and movement of vehicles for site establishment.	Loss of fertile topsoil	Soil, Land Use and Land Capability	Construction	5 ha	The construction footprint should be kept as small as possible; Keep as much original land cover as possible; Stripped soils should be stockpiled surrounding the disturbed area	Compliance with measures outlined on this EMP and soil quality standard	During Construction phase	Prevent fertile soil. implementation of Monitoring programme
	Soil Compaction	Soil, Land Use and Land Capability	Construction	5 ha	Avoid creating many access routes. Keep the speed limit to minimum to reduce the tire contractions on the soil.	Compliance with measures outlined on this EMP and soil	During Construction phase	Prevent compaction of soil and land. implementation of

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
						quality standard		Monitoring programme
Clearing of vegetation and movement of vehicles for site establishment	Soil contamination from hydrocarbon spills	Soil, Land Use and Land Capability	Construction	5 ha	<p>Clean all hydrocarbon spills from machinery immediately, and Dispose contaminated soils at a permitted site.</p> <p>Drip trays are to be watertight, and must be emptied regularly and before rain events. The contents of drip trays are to be treated as hazardous waste.</p> <p>Only emergency and essential repairs of vehicles</p>	Compliance with measures outlined on this EMP and soil quality standard	During Construction phase	Prevent pollution of soil and land. implementation of Monitoring programme

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
					and equipment may take place on site.			
Clearing of vegetation and movement of vehicles for site establishment	Uncontrolled soil erosion and change in the area topography.	Topography	Construction	5 ha	Demarcate construction footprint and limit activities to within this footprint as far as possible; Keep the clearance area as small as possible; and Keep as much original land cover as possible	Compliance with measures outlined on this EMP.	During Construction phase	To conform to the natural surroundings of the area
	Increased sedimentation surface runoff and Soil Erosion	Surface Water resources	Construction	5 ha	Limit the development footprint to reduce high-sediment runoff; Avoid clearing the site during the rainy seasons. Rehabilitate the area by re-using stockpiled soil within as short a period of time.	Compliance with water quality Standards	Throughout the life cycle of the mine	Prevent pollution of surface water.

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
Clearing of vegetation and movement of vehicles for site establishment.	Surface water contamination from hydrocarbon spills	Surface Water resources	Construction	5 ha	<p>Clean all hydrocarbon spills from machinery immediately, and Dispose contaminated soils at a permitted site.</p> <p>Drip trays are to be watertight, and must be emptied regularly and before rain events. The contents of drip trays are to be treated as hazardous waste.</p>	Compliance with water quality Standards	Throughout the life cycle of the mine	Prevent pollution of surface water.
	Increased visual levels such as dust and infrastructure	Visual Aspect	Construction	5 ha	<p>The development footprints and disturbed areas should be kept as small as possible.</p> <p>Construction activities should be restricted to</p>	Compliance with measures outlined on this EMP	During Construction phase	To conform to the natural surroundings of the area

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
					<p>daylight hours to limit the need to bright floodlighting and the potential for skyglow.</p> <p>Dust suppression should be carried throughout, whenever dust emanates</p>			
Excavation of pit/ Trenching	Generation of dust	Dust	Construction	5 ha	Dust suppression using water will be undertaken to manage dust emitting from vegetation removal.	Compliance with Ambient air quality Standards	Throughout the life cycle of the mine	Reduction of dust on site.
Excavation of the pit/ Trenching	Increased noise levels from movement of vehicles	Noise	Construction	5 ha	Trucks, machinery, and equipment must be regularly serviced to reduce noise levels	Compliance with Ambient noise quality Standards	Throughout the life cycle of the mine	Reduction of noise levels

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
Excavation of the pit/ trenching	Soil erosion and reduction in land capability	Soil and Land	Operational	5 ha	Carry out concurrent rehabilitation throughout the life of the mine.	Compliance with measures outlined on this EMP and soil quality standard	Throughout the life cycle of the mine	Prevent compaction of soil and land. implementation of Monitoring programme
Decommissioning/ closure	Dust generated from removal of site infrastructure and from spreading of topsoil	Air Quality	Decommissioning	5 ha	Topsoil must be spread during less windy days; Vegetation cover must be introduced as soon as possible to avoid soil erosion. Implement dust suppression measures to minimize dust ;Revegetation must be done during rainy season.	Compliance with Ambient air quality Standards	Throughout the life cycle of the mine	To remain within air quality ambient level

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
Decommissioning	Hydrocarbons spillages and wildlife deaths from Vehicles	Fauna and Flora	Decommissioning	5 ha	Protect vegetation and soil by avoiding hydrocarbon spillages. Vehicles must make use of existing roads to avoid destruction of vegetation;	Compliance with conservation of wildlife Standards	Throughout the life cycle of the mine	Prevent and protect and conserve the lives of fauna and flora
Decommissioning	Rehabilitation activities (spreading of topsoil, removal of infrastructures and rehabilitation of access roads) will assist to reduce the	Visual	Decommissioning	5 ha	All unnecessary infrastructure must be removed from the site; Spread topsoil over the rehabilitated area; Surface water and drainage lines must be rehabilitated to create a free-draining topography; Re-vegetate the	Compliance with measures outlined on this EMP	During Operational phase	To conform to the natural surroundings of the area

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
	negative visual impact of mining on the receiving environment.				Rehabilitate areas; Ensure that the all boreholes are closed with a steel cap.			
Decommissioning	Increase of ambient noise levels from vehicles movements	Noise	Decommissioning	5 ha	Trucks, machinery, and equipment must be regularly serviced to ensure noise levels are not exceeded; Reduce the vehicles speed limits; Switch off equipment when not in use.	Compliance with Ambient Noise Standards	Throughout the life cycle of the mine	To remain within ambient noise level
Decommissioning	Restoration of the surrounding	Soil, land use and land capabilities	Decommissioning	5 ha	No mitigation measure is required for this impact as is positive and land is	Compliance with measures outlined on	decommissioning phase	Land restoration

Activity	Impact	Aspect	Phase	Size and scale	Mitigation measures	Compliance with standards	Time period for implementation	Standard to be Achieved
	land and itsland use				reinstated back to the state prior prospecting activities	this EMP and soil quality standard		
	Soil and Land contamination from Hydrocarbons spillages	Soil, land use and land capabilities	Decommissioning	5 ha	Protect vegetation and soil by avoiding hydrocarbonspillages; Vehicles must make use of existing roads to avoid destruction of vegetation.	Compliance with measures outlined on this EMP and soil quality standard	Decommissioning phase	Land restoration

2.6 Impact management outcomes

(A description of impact management outcomes, identifying the standard of impact management required for the aspects contemplated in paragraph);

All the above requirements are addressed in **Table 11** above.

2.7 Impacts management actions

(A description of impact management actions, identifying the manner in which the impact management objectives and outcomes contemplated in paragraphs (c) and (d) will be achieved).

All the above requirements are addressed in **Table 11** above.

2.8 Financial Provision

2.8.1 Determination of the amount of Financial Provision.

- i. **Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under the Regulation.**

Closure and rehabilitation will be done with reference to the closure objectives listed in item 2.4.1.

- ii. **Confirm specialty that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.**

The closure objectives will be discussed with the land occupants and interested and affected parties during the public meeting

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

Table 12: Rehabilitation measures

Activity	Extent before closure	Area After Rehabilitation and Closure.
Pit area	3 ha	Backfilled and sloped to cater for not totally closing the pit and for safety.
Stockpile	500 m ²	Completely removed and used to backfill and for revegetation.
Surface infrastructures (Mobile office, mobile	1000 m ²	Area completely rehabilitated- all infrastructure removed.

ablution facilities, crushing and screening)		
Waste rock dump	1500m ²	It can be used to backfill the pits.

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

The closure objectives are aligned with the site and the rehabilitation that must be done. The closure objectives are aimed at leaving the project site as far as possible, in the state, which is safe, which will allow natural succession and as close as possible to the pre- mining state.

- ii. **Calculate and state the quantum of the financial provision required to manage and rehabilitate the environment in accordance with the applicable guideline.**

Financial Provision for Rehabilitation for year 1 is calculated on table below. The financial provision will be revised annually to cater for any additional liability. Table below shows the area of pit on year one and the following years.

Year	Size of the excavation	Total size (considering concurrent rehabilitation)
1	0,5ha	0,5ha
2	+0,5ha (-0,5ha of concurrent rehab)	0,5ha
3	+0,5ha (-0,5ha of concurrent rehab)	0,5ha
4	+0,5ha (-0,5ha of concurrent rehab)	0,5ha
5	+1ha	1,5ha

Note: should concurrent rehabilitation be delayed during any year, the additional liability will be catered for the annual revision of the financial provision.

Table 13: Financial Provision

Applicant: Modison Mining (Pty) Ltd		Ref: LP30/5/1/3/2/11962MP					
Evaluator: Mukondeleli Mmakoya		Date: February 2023					
No.	Description	Unit	A	B	C	D	E=A*B*C*D
			Quantity	Master Rate 2022	Multiplication factor	Weighting factor 1	Amount (Rands)
1	Dismantling of processing plant and related structures (including overland conveyors and power lines)	m ³	0	19.46	1	1	0.00
2 (A)	Demolition of steel buildings and structures	m ²	0	271.16	1	1	0.00
2(B)	Demolition of reinforced concrete buildings and structures	m ²	0	399.15	1	1	0.00
3	Rehabilitation of access roads	m ²	0	48.52	1	1	0.00
4 (A)	Demolition and rehabilitation of electrified railway lines	m	0	470.97	1	1	0.00
4 (B)	Demolition and rehabilitation of non-electrified railway lines	m	0	256.89	1	1	0.00
5	Demolition of housing and/or administration facilities	m ²	0	542.33	1	1	0.00
6	Opencast rehabilitation including final voids and ramps	ha	0,25ha	276,014.60	1	1	69,003.65
7	Sealing of shafts adits and inclines	m ³	0	145,57	1	1	0.00
8 (A)	Rehabilitation of overburden and spoils	ha	0	189,528.13	1	1	0.00

8 (B)	Rehabilitation of processing waste deposits and evaporation ponds (basic salt producing waste)	ha	0	236,053.85	1	1	0.00
8 (C)	Rehabilitation of processing waste deposits and evaporation ponds (acidic metal-rich waste)	ha	0	685,612.26	1	1	0.00
9	Rehabilitation of subsided areas	ha	0	158,701.25	1	1	0.00
10	General surface rehabilitation	ha	0.115	150,138.23	1	1	17,265.9
11	River diversions	ha	0	150,138.23	1	1	0.00
12	Fencing	m	0	171,26	1	1	0.00
13	Water management	ha	0	57,086.78	1	1	
14	2 to 3 years of maintenance and aftercare	ha	0.215	19,980.38	1	1	4,295.79
15 (A)	Specialist study	Sum	1	0.00	1	1	0.00
15 (B)	Specialist study	Sum	1	0.00	1	1	0.00
					sum		73,316.70
			Subtotal 1	weighting factor 2	1		73,316.70
1	Preliminary & General		10%				7,331.67
1	Contingencies		10%				7,331.67
			Subtotal 2				80,648.37
			VAT (15%)		15%		12,097,26
			Grand Total				92,745.63

The total area to be disturbed by the proposed mining activities in year 1 is 0.775ha. The financial provision will be reviewed annually.

i. Confirmation that the financial provision will be provided as determined.

The financial provision will be provided as determined upon request by the competent authority.

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

2.9.1 Monitoring of Impact Management Actions

Monitoring of the impact management actions will be done by the Environmental Control Officer and the project manager. The ECO will be based on site to ensure that all management actions are implemented where required. Should, under any circumstance, the contractor's activities pose any damage on the environment and not comply with measures and impact management actions as stipulated in the EMP, the contractor will be held responsible for any such non-compliance. It is therefore the responsibility of the contractor to ensure that all relevant measures are taken to rectify such damage, at the contractor's expense. It is the duty of the ECO to monitor compliance with the EMP, and report and notify the contractor of any non-compliance, highlighting the following:

- Details of the nature of the non-conformance;
- The actions to be taken to correct the situation; and
- The date by which each corrective action should be executed.

The contractor will also be liable to produce a Corrective Action Plan, within which he/she will detail how the required corrective actions will be implemented. This plan will be submitted to the ECO and Project Manager for approval prior to implementation and the corrective measures have been carried out, the ECO will then be required to sanction the success or failure of the corrective action.

2.9.2 Monitoring and reporting frequency

Monitoring will be done monthly and the reporting to the competent authority will be done annually. Any non-compliances will be recorded and plans of actions documented

2.9.3 Responsible Person's

For this EMP to be implemented effectively, all role players involved in this project need to comply with the directives set out. A concise description of impacts and their mitigation/management measures will be provided and understood by all role players responsible for the implementation and monitoring of the mitigation measures.

This project will comprise of the following responsible role players:

- Lead Authority (DMR- North West Regional Office)
- The Environmental Control Officer;
- The Contractor;
- The project manager and
- The Developer (Permit holder).

These parties will ensure that all conditions stated on the right are adhered to and that all environmental management requirements are met. Each person's responsibility is detailed in the Table below;

Table 14: Roles and Responsibilities of each persons involved

Functions	Responsibility
Permit Holder	Ensuring compliance to the EMP and conditions contained in the Environmental Authorisation (EA). Contracting the Environmental Control Officer as an independent appointment to objectively monitor and implement the applicable environmental legislation.

Project Manager	<p>Complete responsibility of the whole project and any contracted parties and ensuring that all environmental management facets are adhered to. The Project Manager will be supported by the ECO, with the following roles and responsibilities during the operations;</p> <ul style="list-style-type: none"> • Review the annual reports compiled by the Environmental Control Officer (ECO); • Identify the need for remedial measures with regard to proposed works; • Communicate directly with the Contractors; and Issue non-conformance notifications to Contractors that do not comply with the requirements as set out in the EMP
Environmental Control Officer	<ul style="list-style-type: none"> • Objectively monitor, implement applicable environmental legislation, conditions of Environmental Authorisations (EA's) and the EMP. • Conduct audits on compliance to applicable environmental legislation, conditions of EA's and the EMP. Including size and sensitivity of the development (on grounds of the EIA). • Liaison between the relevant authorities and project team. Any changes in environmental conditions, registration and updating of all EMP documentation should be communicated and carried out by the ECO • Develop environmental awareness training for all new site personnel (e.g., posters, tool box talks, signage); • Undertake visual inspections of the activities of employees with regard to implementation of the requirements outlined in the EMP; • Immediately notify the Project Manager of any non-compliance with the EMP, or any other complaints or issues of environmental concern; and ensure that all environmental monitoring programmes (sampling, measuring, recording etc.) are carried out according to protocols and schedules.

Lead Authority (DMRE Limpopo Regional Office)	The department responsible for approving the Environmental Authorisation application. Ensuring that the monitoring and adherence to EMPs is carried out, by going through/reviewing audit reports submitted by the ECO and conducting regular site visits.
Contractor	A Contractor will be employed by the developer for different components of the project. The Contractor's primary responsibilities are to construct the works and ensure compliance with the EMP whilst carrying out the work.

2.9.4 Time period for implementing impact management actions

The impact management actions must be implemented immediately or within a day of being approved.

2.9.5 Mechanisms for monitoring compliance

Table 15: Mechanisms for monitoring compliance

Associated Potential Impacts	Functional Requirements for Monitoring	Roles and Responsibilities	Monitoring and Reporting Frequency and Time Periods for Implementing Impact Management Actions
CONSTRUCTION & OPERATIONAL PHASE			
Noise Generation	Maintain a complaint register that is made accessible to the local community and local farmers.	ECO and Project Manager	Monitor Monthly
	Safety inspection to ensure all workers are wearing protective ear plugs during operational phase	ECO and Project Manager	Reporting Daily
Soil contamination by oil spills from vehicles and machinery.	<ul style="list-style-type: none"> Daily inspection of operational equipment Service vehicles timeously 	ECO and Project Manager	<ul style="list-style-type: none"> Daily Inspection Weekly Reporting
Dust	<ul style="list-style-type: none"> Safety inspections to ensure all workers are wearing protective gears (dust mask) during operation 	<ul style="list-style-type: none"> ECO and Occupational Hygienist Project Manager 	<ul style="list-style-type: none"> Monthly Monitoring Monthly Reporting Monthly reporting/ Daily Monitoring

	<ul style="list-style-type: none"> • Dust suppression inspection on the access roads • Maintain a complaint register that is made accessible to the local community members. 		
Safety and hazards	Maintain an incident register for any accidents or safety incidences.	ECO & Project Manager	Monthly Reporting
Soil erosion	Ensure concurrent rehabilitation (backfilling, fertilization, and or re-vegetation) is implemented throughout the life of the project	ECO and Project Manager	Monthly Reporting
Safety and hazards	Maintain an incident register for any accidents or safety incidences	ECO and Project Manager	Monthly Reporting
Solid waste such as debris and litter may be generated and deposited in and around the site. This may attract nuisance and affect the natural	Inspection of waste storage and ablution facilities	ECO and Project Manager	<ul style="list-style-type: none"> • Weekly Monitoring • Monthly Reporting

scenery/aesthetic quality of the site.			
Contamination of soil and underground water by spills from mobile ablution facilities.		ECO and Project Manager	<ul style="list-style-type: none"> • Weekly Monitoring • Monthly Reporting
REHABILITATION PHASE			
Recovery and restoration of the Natural Habitat Dust dispersal Rehabilitation of the disturbed and contaminated areas Re-vegetation Removal of all mobile infrastructure on site	<ul style="list-style-type: none"> • annually revise financial provision and pay the shortfall • Inspection of rehabilitation on site and comparison of rehabilitation progress against the rehabilitation plan • Continuous monitoring of rehabilitation process and objectives. 	<ul style="list-style-type: none"> • ECO & Competent Authority • Safety Officer/Occupational Hygienist 	Monthly, quarterly & annual inspection and reporting

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

The Environmental Management (EMP) audit report will be done and submitted annually.

2.11 Environmental Awareness Plan

An environmental control officer will undertake awareness of different environmental aspect and will train the employees on how to deal with emergency situations and how to remediate such emergencies.

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

The environmental control officer will have monthly meetings to conduct environmental awareness with all the employees. There will also be a monthly environmental topic of which the notices will be pasted at the site office for the employees to see every morning as they report to work.

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

The EMP details commitments in order to avoid pollution or the degradation of the environment. Compliance with the EMP commitments will form part of the contractors' contract. Employees will also be briefed regarding the EMP commitments prior to the commencement of operations. The ECO will monitor that the commitments are being adhered to by the contractors and employees.

2.12 Specific information required by the Competent Authority.

(Among others, confirm that the financial provision will be reviewed annually).

The financial provision will be reviewed annually as per the requirements of Section 24(P)(3) of NEMA. The Applicant commits to conduct EMP audit as required in terms of Regulation 55 of the MPRDA on a biennial basis and external environmental audits of the EMP and Environmental Authorisation as per the NEMA EIA Regulations.

2.13 Undertaking

The EAP herewith confirms:

- 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 whererelevant; and;
- That the information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected. Parties are correctly reflected herein.



Signature of the environmental assessment practitioner:

Ergy Investments (Pty)Ltd

Name of company:

28 June 2023

Date: