

# PROPOSED PROSPECTING RIGHT FARM 622, FOR URANIUM ORE IN THE NAMAQUALAND MAGISTERIAL DISTRICT IN THE NORTHERN CAPE PROVINCE.

## FINAL BASIC ASSESSMENT REPORT



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## **EXECUTIVE SUMMARY**

Solium Energy (Pty) Ltd (“hereinafter referred to as “the Applicant”), applied for environmental authorisation (EA) and a prospecting right for Uranium Ore on farm 622 within the Namaqualand Magisterial District in the Northern Cape Province. The proposed activity will make use of non-invasive as well as invasive prospecting that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done.

The proposed project triggers listed activities in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the Environmental Impact Assessment Regulations 2014 (as amended 2017) and therefore requires an environmental impact assessment (basic assessment process) that assess project specific environmental impacts and alternatives, consider public input, and propose mitigation measures, to ultimately culminate in an environmental management programme that informs the competent authority (Department of Mineral Resources and Energy) when considering the environmental authorisation. This report, the Draft Basic Assessment Report, forms part of the departmental requirements and presents the first report of the EIA process.

### **Project Description**

The proposed prospecting footprint applied for is 83 954 ha on farm 622 for Uranium Ore within the Namaqualand Magisterial District in the Northern Cape Province.

The proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done. Prospecting sites will be moved to various area depending on sensitivity and accessibility.

Prospecting activities will entail the following:

- Non-Invasive Prospecting:
  - Desktop geological studies (Year 1),
  - Surface Mapping (Year 2-3),
  - Radon Emanometry (Year 2-3),
  - Interpretation and Analysis of Field Results (Year 2-3).

- Invasive Prospecting:
  - Target Drilling (Year 4),
  - Infill Drilling (Year 4).

Once the target areas were identified (during non-invasive prospecting) and the invasive prospecting commences (only in year 4), site establishment will entail discussions with the landowner regarding access to the property, the clearance of vegetation (where necessary) from the areas to be prospected, the stripping and stockpiling of the topsoil, and the introduction of the prospecting equipment.

Drill site will entail Reverse Circulation (RC) and Diamond (Core) drilling methods approximately (10m x 10m) in area at a maximum of 4 sites at any given time. Total disturbance less than 0.04 ha.

Boreholes will vary between 10 - 30 boreholes to be drilled throughout the prospecting area. Total disturbance less than 0.3 ha for the entire life of the prospecting right area.

Approximately 5 tons of drill core are expected to be generated during each drilling phase. The entirety of this material will be transported off-site, with approximately 10% being sent to a laboratory for analysis. The transportation of the core is typically carried out using standard single cab bakkie using existing roads.

The prospecting activities does not require bulk sampling nor the use of any permanent equipment/infrastructure. Chemical ablutions will be established. All chemicals/hydrocarbons will be kept in the storage containers with drip trays.

- Testing:

Approximately 5 tons of drill core are expected to be generated during each drilling phase and will be sent to an off-site laboratory to be crushed, split, pulverized, and analysed.

- Electricity Need:

The prospecting activities does not require electricity as all equipment will be powered with generators.

- Water Use:

Water will be used for drilling, and dust suppression at the prospecting sites and access roads. Potable water will daily be transported to site, while the process water will be bought from local sources (to be identified) in the vicinity of the prospecting activities.

- Waste Handling:

Due to the small scale of the activity, the generation of general waste is expected to be minimal. General waste will be managed responsibly by collecting it daily in refuse bags to maintain cleanliness and environmental compliance. The collected waste will then be transported and disposed of at a recognized waste disposal facility that adheres to relevant environmental regulations. This approach ensures that waste handling aligns with best practices for minimizing environmental impact while maintaining the efficiency and sustainability of the activity.

Hazardous waste will be contained in designated hazardous waste containers to be removed by a registered contractor. A registered contractor will be appointed to collect and dispose of the hazardous waste at a registered hazardous waste handling facility and the site will file the proof of safe disposal for auditing purposes.

The chemical toilets will weekly be serviced by an appropriately qualified sewerage handling contractor who will furnish the site with proof of safe disposal.

- Servicing and Maintenance

No workshop, wash bay or service areas will be established at the prospecting sites. When needed maintenance/servicing of the equipment will be performed at the contractor's off-site workshop.

**Identified Alternatives:**

- **The property on which, or location where, it is proposed to undertake the activity - Site Alternative 1 (Preferred and Only Site Alternative):**

Site Alternative 1 was identified as the preferred and only viable site alternative based on the following: The Prospecting area with a footprint of approximately 83 954 ha on farm 622 within the Namaqualand Magisterial District in the Northern Cape Province (hereafter referred to as the application property).

As mentioned in the prospecting work programme at this stage of the project, it is impossible to define the exact locations of drill sites or number of drillholes to be dug. However, the detailed drilling spacing will be planned to allow the defining of an Inferred Mineral Resources as per the SAMREC code. Should there be a need to conduct an extra exploration work, which is not indicated herein, in order

to clearly define Mineral Resource Category, Department of Mineral Resources and Energy will be provided with an addendum in respect to the Prospecting Work Programme.

Availability of the mineral resource will only be determined should prospecting the prospecting right be granted and drilling can take place.

- **Type of activity to be undertaken**

The proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done. Prospecting sites will be moved to various area depending on sensitivity and accessibility.

- **Design and layout of the activity.**

### **Layout Alternative: Site 1**

**Final Layout Alternative (FLA) (Preferred Layout):** The final layout plan or drilling plan for the project has not yet been developed. However, all drilling activities will be carefully planned to avoid sensitive areas. As such, specialist studies have not been conducted to date. Each drill site will involve Reverse Circulation (RC) and Diamond (Core) drilling methods and will occupy an area of approximately 10m x 10m. A maximum of four sites will be active at any given time, resulting in a total disturbance of less than 0.04 hectares at any one time. Over the life of the prospecting right, between 10 and 30 boreholes will be drilled across the prospecting area, with a cumulative disturbance of less than 0.3 hectares.

Given the minimal disturbance, drill sites can be adjusted to avoid potential impacts on sensitive areas. Before any invasive activities commence, a walk-through will be conducted by specialists, including wetland and ecological experts, to identify and designate sensitive areas as no-go zones. During the Environmental Impact Assessment (EIA) phase, the potential impacts of the proposed activities on the receiving environment were assessed. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations.

Therefore, no additional design/layout alternatives were deemed viable for this project.

- **Technology to be used in the activity.**

The technology to be used for this activity aligns with its objectives, requiring no highly specialized tools or secondary processing. In Phase 1, a desktop study will utilize basic computing and database management software to compile and analyse historical geological data from stakeholders such as

the Council for Geoscience and universities. In Phase 2, field mapping and geophysical surveys will employ standard field equipment, such as GPS devices and portable gamma-ray spectrometers, for surface mapping and detecting radioactive anomalies. For the more invasive phases (3 and 4), standard Reverse Circulation (RC) and Diamond Drilling technologies will be used to acquire geological samples for analysis, which can be processed locally. Overall, the technology selected is cost-effective, readily available, and sufficient for the project's requirements, making alternative technological options unnecessary.

### **No-go Alternative:**

The no-go alternative was not deemed to be the preferred alternative as:

- The applicant will not be able to prospect for any possible mineral resource;
- The application, if approved, would allow the applicant to determine the available mineral as well as provide employment opportunities to local employees. Should the no-go alternative be followed, these opportunities will be lost to the applicant, potential employees and clients; and
- The applicant will not be able to diversify the income of the property.

Not proceeding with the proposed operation will entail that a mineral which if found will contribute towards the local and provincial social and economic structures of the area, will not be mined, and that this opportunity will be lost.

### **Public Participation Process:**

In accordance with the timeframes stipulated in the EIA Regulations, as amended, the Draft Basic Assessment Report was compiled and will be distributed for comment and perusal to the I&APs and stakeholders. A 30-day commenting period, ending 30 January 2025 at 17:00, was allowed for perusal of the documentation and submission of comments. The comments received on the DBAR were incorporated into the Final Basic Assessment Report (FBAR) to be submitted for decision making to DMRE.

During this public participation process the relevant stakeholders and I&APs were informed of the project by means of an advertisement in the Gemsbok Newspaper on 6 December 2024, Site notices were placed in Afrikaans and English in Concordia and at the farm boundary fences.

Flyers containing project information were distributed in the rural community of Kommagas, Springbok and Concordia. For more details, please refer to Appendix E.

### **Basic Assessment Report:**

The Basic Assessment Report identifies the potential positive and negative impacts that the proposed activity will have on the environment and the community as well as the aspects that may impact on the socio-economic conditions of directly affected persons and proposes possible mitigation measure that could be applied to modify / remedy / control / stop the identified impacts.

The key finding of the environmental impact assessment entail the following:

#### **Topography:**

the topography of the study area consists of level to slightly undulating sedimentary surfaces between rocky granitic hills and mountains, such as wide plains and broad valleys with dry channels of intermittent water courses. The elevation loss from the north-east corner to the south-west corner of the proposed footprint is 1111 m over 55 km.

#### **Visual Characteristics:**

The viewshed analysis showed that the visual impact of the proposed prospecting operation will be of low significance. The small scale of the proposed operation contributes to the low visual significance. Should the Applicant successfully rehabilitate the prospecting areas (upon closure), no residual visual impact is expected upon closure of the prospecting activities.

#### **Air and Noise Quality:**

The proposed activity will contribute the emissions of a drilling rig and field vehicles to the receiving environment for the duration of the operational phase. Should the prospecting holder implement the mitigation measures proposed in this document and the EMPR the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use. The potential impact on the noise ambience of the receiving environment is expected to be of low significance.

#### **Geology & Soil:**

As per the Prospecting Work Programme (Appendix M), foliated granites, granitic orthogneisses and late- to post-tectonic granites are extensively represented in all the metamorphic zones, including the high-T granulite-facies (aged 1033 Ma, 1200 Ma, 1060 Ma and 1030 Ma). Heat produced during radioactive decay in these rocks was largely responsible for their metamorphic conditions, especially where granulite and charnockite formation was promoted by the circulation of U–Th–REE-rich, H<sub>2</sub>O-deficient fluids and melts. Hosts granulite-facies granitic plutons with the highest concentrations of

heat-producing elements (K, U and Th). There are also numerous late-stage smaller intrusions of U-rich leucogranite that may constitute potential resources of uranium.

### **Hydrology:**

The site falls within quaternary catchment D82D & F30E which forms part of the Lower Orange Water Management Area (WMA) which is managed by the Department of Water and Sanitation (DWS). According to the National Freshwater Ecosystem Priority Areas (NFEPA) map as presented by SANBI, a few NFEPA river intersects with the proposed prospecting footprint. Since the final layout plan or drilling plan for the project has not yet been developed, all drilling activities will be carefully planned to avoid these sensitive areas.

### **Mining, Biodiversity and Groundcover:**

The prospecting activities does not require the removal of any large trees or vegetation of significance. According to the 2016 Northern Cape Critical Biodiversity Areas, SANBI map, the proposed prospecting areas intercept with a Critical Biodiversity Areas 1 and 2 along with an Ecological Support Area in the bigger south-west portion of the proposed site.

The management objectives of Critical Biodiversity Areas (CBAs) 1 and 2 aim to reduce biodiversity loss and protect important ecosystems outside of protected areas.

The management objectives of an Ecological Support Area (ESA) involve maintaining the ecological functioning of a Conservation Biodiversity Area (CBA) or protected area, generating or delivering key ecosystem services, and meeting biodiversity targets for ecosystem types or species when it is not feasible to achieve them in natural or near natural areas. Although the proposed prospecting area does indeed fall in sections within an Ecological Support Area, however it can be considered that due to the small footprint of a borehole, the drill position can be manipulated to drill between the sensitive sites. In light of this, the impact of the prospecting operation on the vegetation cover of the receiving environment is deemed to be of low significance. Should the Applicant implement the mitigation measures proposed in the EMPr the impact of the proposed activity on the surrounding area in general is deemed to be of low significance.

### **Fauna:**

Various small mammals and reptiles occur are likely to on the property. Small mammals, reptiles and insects will occur in the area. The screening tool shows the Animal Species sensitivity of the earmarked properties is high. As mentioned above, the proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done. Prospecting sites will be moved to various



area depending on sensitivity and accessibility. Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas. Should the Applicant implement the mitigation measures proposed in the EMPr the impact of the proposed activity on the animal species in general is deemed to be of low significance, therefore it is proposed that no specialists' studies in this regard will be required.

### **Cultural and Heritage Environment:**

As per the screening report, the area has a majority low heritage impact with small section that show Very High sensitivity (these areas are to be completely avoided) but has a medium palaeontology sensitivity and according to the SAHRA Paleontological sensitivity map the study area extend over an area of low and insignificant/zero (grey) concern.

Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

### **Site Specific Infrastructure:**

The prospecting site will contain the following:

- Surveying Equipment;
- Chemical toilet;
- Drilling equipment;
- Geophysical logging equipment;
- Field Vehicles;
- Sample Analysis equipment; and
- Other relevant field equipment.

During the Environmental Impact Assessment process, the feasibility of the proposed site was assessed to identify fatal flaws that are deemed as severe as to prevent the activity continuing or warrant a site or project alternative. The outcome of the assessment showed that should the mitigation measures and monitoring programmes proposed in this document be implemented, no fatal flaws could be identified that prevents the activity continuing.

### **Environmental Management Programme (EMPR)**

The EMPR provides a description of the impact management outcomes and closure objectives. It presents the impacts to be mitigated in their respective phases as well as stipulates the mitigation measures to be applied on site.

The financial provision amount that will be necessary for the rehabilitation of damages caused by the operation, both sudden closures during the normal operation of the project and at final, planned closure gives a sum of **R 88 353,14**.

## LIST OF ABBREVIATIONS

BGIS	Biodiversity GIS
CARA	Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)
CBA	Critical Biodiversity Area
DALR&RD	Department of Agriculture, Land Reform and Rural Development
DBAR	Draft Basic Assessment Report
DMRE	Department of Mineral and Resources and Energy
DoT	Department of Transport
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIA Regulations	Environmental Impact Assessment Regulations, 2014 (as amended)
EISC	Ecological Importance and Sensitivity Category
EMPR	Environmental Management Programme
ESA	Early Stone Age
FBAR	Final Basic Assessment Report
GDP	Gross Domestic Product
GNR	Government Notice
I&APs	Interested and Affected Parties
LSA	Late Stone Age
MHSA	Mine Health and Safety Act, 1996 (Act No. 29 of 1996)
MPRDA	Minerals and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)
MSA	Middle Stone Age
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NEM: AQA	National Environmental Management: Air Quality Control Act, 2004 (Act No. 39 of 2004)
NEM:BA	National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)
NEM: WA	National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)
NFEPA	National Freshwater Ecosystem Priority Areas
NHRA	National Heritage Resources Act, 1999 (Act No 25 of 1999)
NRTA	National Road Traffic Act, 1996 (Act No. 93 of 1996)
NWA	National Water Act, 1998 (Act No. 36 of 1998)

PAOI	Project Area of Influence
PCB's	Polychlorinated Biphenyl
PCO	Pest Control Officer
PES	Present Ecological State
PPE	Personal Protective Equipment
PR	Prospecting Right
PSM	Palaeontological Sensitivity Map
RA	Risk Assessment
REC	Recommended Ecological Category
S1	Site Alternative 1
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
SAMBF	South African Mining and Biodiversity Forum
USBM	US Bureau of Mines
WMA	Water Management Area
WULA	Water Use Licence Application

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# **BASIC ASSESSMENT REPORT**

## **And**

# **ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT**

SUBMITTED FOR ENVIRONMENTAL AUTHORIZATION IN TERMS OF THE NATIONAL ENVIRONMENTAL 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).

<b>NAME OF APPLICANT:</b>	Solium Energy (Pty) Ltd
<b>TEL NO:</b>	+33 6 52 88 00 92
<b>FAX NO:</b>	N/A
<b>POSTAL ADDRESS:</b>	57/63 Line Wall Road Gibraltar, GX11 1AA
<b>FILE REFERENCE NUMBER SAMRAD:</b>	NC30/5/1/2/2/14025PR

## IMPORTANT NOTICE

In terms of the Mineral and Petroleum Resources Development Act (Act 29 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 can 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 taken into account 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) 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) identify the alternatives considered, including the activity, location, and technology alternatives;
- (c) 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, signification, 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.

## PART A

### SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

#### 1. CONTACT PERSON AND CORRESPONDENCE ADDRESS

##### a) Details of: Greenmined Environmental

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) the proponent must appoint an independent Environmental Assessment Practitioner (EAP) to undertake the environmental impact assessment (EIA) of any activities regulated in terms of the aforementioned Act. Solium Energy (Pty) Ltd appointed Greenmined Environmental to undertake the study needed. Greenmined Environmental has no vested interest in Solium Energy (Pty) Ltd or the proposed project and declares its independence as required by the Environmental Impact Assessment Regulations, 2014 (as amended) (EIA Regulations).

##### i) Details of the EAP

Name of the Practitioner: Mrs Sonette Smit (Senior Environmental Consultant)  
Tel No.: 021 851 2673  
Fax No.: 086 546 0579  
E-mail address: [sonette.s@greenmined.co.za](mailto:sonette.s@greenmined.co.za)

##### ii) Expertise of the EAP.

###### (1) The qualifications of the EAP

(with evidence).

Mrs. S Smit has sixteen years of experience in environmental legal compliance audits, (GIS) geographic information system, mining right and permit applications and applications for environmental authorisations & Water use applications. Please find full CV attached in Appendix I.

###### (2) Summary of the EAP's past experience.

(In carrying out the Environmental Impact Assessment Procedure)

Sonette Smit is an Environmental Consultant with 17 years' experience in the environmental sector. She specialized in the last 12 years in the mining sector where she conducted mining related reports and programs. She has also been involved in a number of other environmental and water use application projects where she compiled environmental management plans, environmental impact assessments, environmental audits, IWULA's/IWWMP's.

Mrs. S Smit is a registered Environmental Assessment Practitioner (registration no: 2020/2467) with EAPASA (Environmental Assessment 19 Practitioners Association of South Africa) since 2020. See a list of past projects attached as Appendix I.

**b) Location of the overall Activity.**

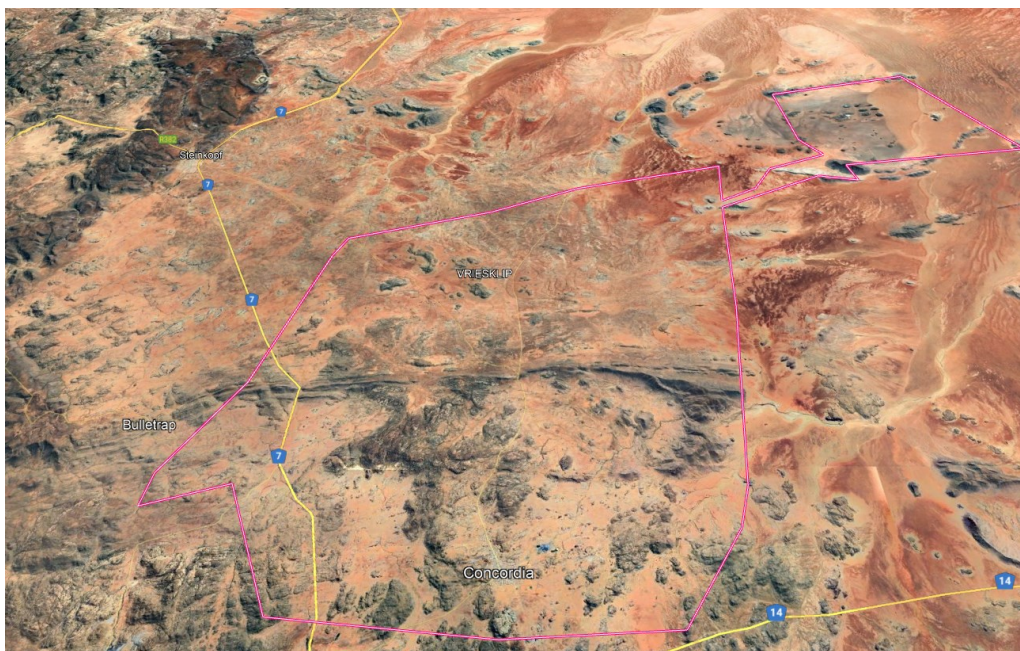
*Table 1: Location of the proposed project.*

<b>Farm Name:</b>	Farm 622 within the Namaqualand Magisterial District in the Northern Cape Province.
<b>Application area (Ha)</b>	83 954 ha
<b>Magisterial district:</b>	Namakwa District Municipality
<b>Distance and direction from the nearest town</b>	The proposed area is situated about 30 km northeast and 40 north west of Aggeneys and Pofadder, respectively.
<b>21-digit Surveyor General Code for each farm portion</b>	C053000000000622000000

**c) Locality map**

(show nearest town, scale not smaller than 1:250000).

The requested map is attached as Appendix B.



*Figure 1: Satellite view of the proposed prospecting right area of Solium Energy (Pty) Ltd (image obtained from Google Earth).*

#### d) 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 aforesaid main and listed activities, and infrastructure to be placed on site.

Solum Energy (Pty) Ltd (“hereinafter referred to as “the Applicant”) applied for a prospecting right over farm 622 within the Namaqualand Magisterial District in the Northern Cape Province (83 954 ha). The proposed prospecting area is a natural area. The planned activity for the proposed site is detailed below under point i. All activities will be contained within the boundaries of the site. Prospecting drill sites will be moved to various area depending on sensitivity and accessibility.

See attached as Appendix C for a copy of the prospecting activities and the proposed drill plan of the prospecting right.

#### i) Listed and specified activities

Table 2: Listed and specified activities triggered by the associated prospecting activities.

<b>NAME OF ACTIVITY</b> (E.g. For prospecting – drill site, site camp, ablution facilities, accommodation, equipment storage, sample storage, site office, access route etc... etc... etc  E.g. for mining – excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc... etc...etc.)	<b>Aerial extent of the activity</b> Ha or m <sup>2</sup>	<b>LISTED ACTIVITY</b> Mark with an X where applicable or affected	<b>APPLICABLE LISTING NOTICE</b> (GNR 324, GNR 325, GNR 326 OR GNR 327)
Prospecting	83 954 ha	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Drilling	0.01 ha	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Site Camp	80 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Ablution Facilities	10 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Equipment storage	50 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Sample Storage	40 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20



<b>NAME OF ACTIVITY</b> (E.g. For prospecting – drill site, site camp, ablution facilities, accommodation, equipment storage, sample storage, site office, access route etc... etc... etc  E.g. for mining – excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc... etc...etc.)	<b>Aerial extent of the activity</b> Ha or m <sup>2</sup>	<b>LISTED ACTIVITY</b> Mark with an X where applicable or affected	<b>APPLICABLE LISTING NOTICE</b> (GNR 324, GNR 325, GNR 326 OR GNR 327)
Temporal Site Offices	40 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
Access Roads	100 m <sup>2</sup>	X	GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20
GN517 Environmental Impact Assessment Regulations Listing Notice 1 Activity 20			
<i>Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in the Listing Notice or in Listing Notice 3 of 2014, required to exercise the prospecting right.</i>			

## ii) Description of the activities to be undertaken

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

The proposed prospecting footprint applied for is 83 954 ha on farm 622 for Uranium Ore within the Namaqualand Magisterial District in the Northern Cape Province.

The proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done. Prospecting sites will be moved to various areas depending on sensitivity and accessibility.

### **DESCRIPTION OF PLANNED NON-INVASIVE ACTIVITIES:**

*(These activities do not disturb the land where prospecting will take place, e.g. aerial photography, desktop studies, aeromagnetic surveys, etc.)*

#### **Phase 1 – Desktop Study**

The geological desktop study will be conducted within the applicable area and entails requesting data from relevant stakeholders (Council for Geoscience, Universities, etc.). The aim is to establish if there has been historic mapping, surveys, drilling and/or mining activities within the farm. If data is found an initial database creation will commence to comply with mineral resources reporting codes (SAMREC/JORC/NI 43-101). The desktop study will also be used to generate additional ideas on how to

generate target in the area based on potential mineralisation (U, REE, Sn, etc.) reported.

### **Phase 2 – Reconnaissance visit, field mapping and geophysical survey**

The initial site visit is aimed at establishing relationships with the locals and evaluating the terrain in detail to locate areas of priority in relation to mapping and geophysical targeting.

Field mapping is aimed at identifying surface outcrops and compiling regional surface geological map of the area.

Geophysical survey is aimed at studying the potential natural radioactive decay variabilities and generate radioactive anomalies either by ground or airborne gamma-ray radiometric surveys.

### **DESCRIPTION OF PLANNED INVASIVE ACTIVITIES:**

*(These activities result in land disturbances e.g. sampling, drilling, bulk sampling, etc.)*

### **Phase 3 – RC and/or Diamond Drilling**

The initial drilling will be targeting areas identified as having potential mineralisation, based on historic data, mapping data and radioactive data. Reverse Circulation (RC) and Diamond (Core) drilling program will be implemented to visualise the mineral resource in 3D and have a grade and tonnage estimates.

Drilling of 15 boreholes entails, geological logging, sampling, database and QAQC protocols implementation, 3D geological modelling, resource block modelling/estimation and resource evaluation. All geological samples will be analysed locally in South Africa as required by the Mining Charter.

### **Phase 4 – RC and/or Diamond Drilling**

Drilling of 10 boreholes entails targeting areas of high grades and yielding mining potential. The aim is to update the geological models with details and increase the confidence of resource estimates from inferred to indicated and measured. This will allow for potential economic evaluation of the mineral resource as defined by most mineral reporting codes.

### **Testing:**

Approximately 5 tons of drill core are expected to be generated during each drilling phase and will be sent to an off-site laboratory to be crushed, split, pulverized, and analysed.

#### **1.1 Access Road**

Drill sites will be accessed utilizing existing roads to minimize environmental disruption and ensure efficient transport logistics.

#### **1.2 Equipment and Infrastructure**

Drill site will entail Reverse Circulation (RC) and Diamond (Core) drilling methods approximately (10m x 10m) in area at a maximum of 4 sites at any given time. Total disturbance less than 0.04 ha.

Boreholes will vary between 10 - 30 boreholes to be drilled throughout the prospecting area. Total disturbance less than 0.3 ha for the entire life of the prospecting right area.

Approximately 5 tons of drill core are expected to be generated during each drilling phase. The entirety of this material will be transported off-site, with approximately 10% being sent to a laboratory for analysis. The transportation of the core is typically carried out using standard single cab bakkie using existing roads.

#### **1.3 Water Use**

Water will be used for drilling, and dust suppression at the prospecting sites and access roads. Potable water will daily be transported to site, while the process water will be bought from a local source (to be identified) in the vicinity of the prospecting activities.

#### **1.4 Electricity**

The prospecting activities does not require electricity as all equipment will be powered with generators.

#### **1.5 Waste Management**

Due to the nature of the project, the small scale of the activity, and the fact that no infrastructure is established, or maintenance work done within the earmarked footprint, very little to no general waste is generated as a direct result of the prospecting

activities. Any waste generated during the invasive phase, is contained in the site vehicles, and daily removed from the site.

Hazardous waste will mainly be the result of accidental spillages or breakdowns. Such contaminated areas will be cleaned up immediately and contaminated soil will be contained in designated hazardous waste containers to be removed daily to a hazardous waste disposal yard in the area. Major spill or leak of hydrocarbons or any other hazardous solvents into the ground and/or water resources, must be reported within the prescribed timeframes to all relevant authorities, including the Directorate: Pollution and Chemicals Management. Containment, clean-up, and remediation must commence immediately in the case of NEMA section 30 incidents, and the necessary documentation must be completed and submitted within the prescribed timeframes.

The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the NEMA, 1998 which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.

## **1.6 Servicing and Maintenance**

No workshop or service area is needed or will be established within the boundaries of the prospecting right. When and if applicable the maintenance/service of the drill rig will be performed on site within the drilling area and in line with approved impact management measures (i.e., hydrocarbon spill management, etc.).

The prospecting site will contain the following:

- Surveying Equipment;
- Chemical Toilet;
- Drilling equipment;
- Geophysical logging equipment;
- Field Vehicles;
- Sample Analysis equipment; and
- Other relevant field equipment.

**DESCRIPTION OF PRE-/FEASIBILITY STUDIES:**

*(Activities in this section include but are not limited to initial geological modelling, resource determination, possible future funding models, etc.)*

The pre-feasibility study will entail development studies, which are not limited to environmental, social and governance studies, determining mining methods, infrastructure design, metallurgical test work and costs versus throughput studies. Feasibility Studies will entail detailed economic evaluation, revenue and profits projections – completion of all studies required for developments, and may include bulk sampling (application will be made in terms of Section 20 of the MPRDA)

The prospecting activities does not require bulk sampling nor the use of any permanent equipment/infrastructure. Chemical ablutions will be established. All chemicals/hydrocarbons will be kept in the storage containers or bunded areas with impermeable surfaces.

**DECOMMISSIONING PHASE**

The decommissioning phase will entail the removal of the drill rig and any foreign material from site; progressive closing of the drill holes and using material from around the boreholes and landscaping any compacted surfaces (if needed) will be implemented as the contractor moves from one borehole to the next. Upon closure of the prospecting right the area will return to its natural state. Due to the nature of the activity no buildings or permanent infrastructure needs to be demolished, and the access roads will remain intact to be used by the landowner.

The decommissioning activities will therefore consist of the following:

- Removal of all prospecting machinery from the prospecting area;
- Removal of the chemical toilet from the prospecting area;
- Capping of all the boreholes with sand material from around the boreholes;
- Landscaping and replacing the topsoil (if removed); and
- Controlling the invasive plant species.

The PR Holder will comply with the minimum closure objectives as prescribed by the DMRE and detailed below:

**Final Rehabilitation:**

Final rehabilitation of the surface area shall entail landscaping, levelling, maintenance, and clearing of invasive plant species (if applicable). All

equipment, plant and other items used during the prospecting period will be removed from site (section 44 of the MPRDA, 2002). Waste material of any description will be removed from the prospecting area and disposed of in line with the company's waste management procedure. It will not be permitted to be buried or burned on the site. The replacement of topsoil in areas surrounding the development footprint should be sought in situ immediately after the disturbance. The management of invasive plant species will be done (if applicable) in a sporadic manner during the life of the activity. Species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto) will be eradicated from the site. All re-growth of invasive vegetative material must be monitored by the Applicant during the decommissioning phase of the development. Final rehabilitation shall be completed within a period specified by the Regional Manager. All areas under rehabilitation are to be treated as no-go areas using danger tape and steel droppers/fencing and cordoned off, to prevent vehicular, pedestrian and livestock access. Rehabilitation structures must be inspected regularly for the accumulation of debris, blockages, instabilities, and erosion with concomitant remedial and maintenance actions.

Once the prospecting area was rehabilitated the PR Holder is required to submit a closure application to Department of Mineral Resources and Energy in accordance with section 43(4) of the MPRDA, 2002 that states: *"An application for a closure certificate must be made to the Regional Manager in whose region the land in question is situated within 180 days of the occurrence of the lapsing, abandonment, cancellation, cessation, relinquishment or completion contemplated in subsection (3) and must be accompanied by the prescribed environmental risk report"*. The Closure Application will be submitted in terms of Regulation 62 of the MPRDA, 2002, and Government Notice 940 of NEMA, 1998 (as amended). See attached as Appendix C a copy of the site activities map for the proposed project.

The table below lists the GPS coordinates of the proposed prospecting area as shown on the Regulation 2(2) Mine Plan attached as Appendix A.

See attached as Appendix C a copy of the site activities map for the proposed project.

Table 3: GPS Coordinates of the proposed prospecting footprint.

Name	DEC DEGREES	
	LAT	LONG
1	29.5097443349	17.7759858645
2	29.4934897491	17.7766298677
3	29.4402237023	17.8133380541
4	29.3538172444	17.8397421881
5	29.3369762773	17.8500462404
6	29.3122711592	17.9389186916
7	29.2903684395	17.9917269597
8	29.2684610220	18.0851074338
9	29.2987931185	18.0831754240
10	29.2898067695	18.1044275318
11	29.2690228093	18.1192396070
12	29.2549772003	18.1585238065
13	29.2381199233	18.1437117313
14	29.1841579829	18.1385597051
15	29.1588535449	18.2383802119
16	29.2482346228	18.2963405061
17	29.26733774381	18.1701158653
18	29.2802579073	18.17526778915
19	29.2780109865	18.1488637574
20	29.3089018158	18.0805994109
21	29.3914186862	18.0767353913

22	29.5018976192	18.0644993291
23	29.5271170409	18.0561272866
24	29.5708158129	18.0252151297
25	29.5736163717	17.9479347374
26	29.5640941548	17.8461822208
27	29.5007766102	17.8172020737

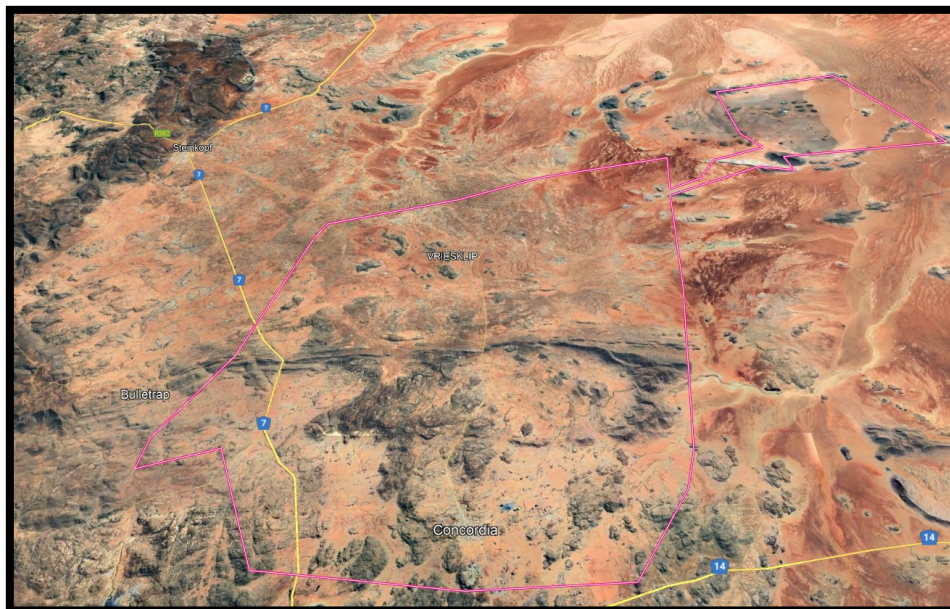


Figure 2: Satellite view showing the position of Site Alternative 1 (pink polygon) within the surrounding landscape (image obtained from Google Earth).



Should the PR be issued and the prospecting for Uranium Ore be allowed, the proposed project will comprise of activities that can be divided into three key phases as discussed in more detail below:

<b>Phase</b>	<b>Activity</b> (what are the activities that are planned to achieve optimal prospecting)	<b>Skill(s) required</b> (refers to the competent personnel that will be employed to achieve the required results)	<b>Timeframe</b> (in months) for the activity)	<b>Outcome</b> (what is the expected deliverable, e.g. geological report, analytical results, feasibility study, etc)	<b>Timeframe for outcome</b> (deadline for the expected outcome to be delivered)	<b>What technical expert will sign off on the outcome?</b> (e.g. geologist, mining engineer, surveyor, economist, etc)
<b>Non- Invasive Prospecting</b>						
1	Desktop study	Qualified Geologist (BSc. Hons) with a minimum of 5 years' experience	12 Months	Establishment of geological and historical exploration databases	12 Months	Senior Geologist
2	Surface mapping	Qualified Geologist (BSc. Hons) with a minimum of 5 years' experience	6 months	Compile a field-based structural and stratigraphic map	6 months	Project Geologist
2	Radon emanometry surveys	Qualified Geologist (BSc. Hons) with a minimum of 5 years' experience	17 Months	A radon emanometry map, whereby Radon gas serves as a pathfinder / proxy for uranium mineralisation	17 Months	Project Geologist
2	Interpretation and analysis of field results	Qualified Geologist (BSc. Hons) with a minimum of 10 years' experience	1 Month	Report on the results of field mapping sample analysis and emanometry surveys	1 Month	Senior Geologist
<b>Invasive Prospecting</b>						
<p>Prior to any invasive activities commence, a walk-through will be conducted by specialists, to identify and designate sensitive areas as no-go zones. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations. – No prospecting activities to be done in sensitive areas.</p>						
3	Target drilling	Qualified Geologist (BSc. Hons) with a minimum of 5 years' experience	6 months	Confirmation of mineralisation at depth	6 months	Project Geologist

4	Infill drilling	Qualified Geologist (BSc. Hons) with a minimum of 5 years' experience	6 months	Confirmation of lateral extent of mineralisation	6 months	Project Geologist
5	Pre-feasibility studies / Feasibility studies	Qualified Geologist (BSc. Hons) with a minimum of 10 years' experience	12 months	Economic evaluation of the mineral resources	12 months	Resource Geologist

## e) Policy and Legislative Context

Table 4: Policy and Legislative Context.

<b>APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT</b>  (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)	<b>REFERENCE WHERE APPLIED</b>	<b>HOW DOES THIS DEVELOPMENT COMPLY AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT.</b>  (E.g. in terms of the National Water Act a Water Use License has/has not been applied for)
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983).	Part A(1)(h)(iv)(1)(a) Type of environment affected by the proposed activity: <i>Physical Environment – Geology and Soil.</i>  Part A(1)(h)(viii) The possible mitigation measures that could be applied on the level of risk – <i>Management of invader plant species.</i>	The mitigation measures proposed for the site includes specifications of the CARA, 1983.
Mine Health and Safety Act, 1996 (Act No 29 of 1996) read together with applicable amendments and regulations thereto including relevant OHSA regulations.	Part A(1)(h)(viii) The possible mitigation measures that could be applied on the level of risk – <i>Management of Health and Safety Risks.</i>	The mitigation measures proposed for the site includes specifications of the MHSA, 1996
Mineral and Petroleum Resources Development Act, 2002, (Act No. 28 of 2002) read together with applicable amendments and regulations thereto. <ul style="list-style-type: none"> <li>• Section 16</li> </ul>	Part A(1)(d) Description of the scope of the proposed overall activity	Application for a prospecting right submitted to DMRE-NC.  Ref No: NC30/5/1/2/2/14025PR
National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended by GNR 326 effective 7 April 2017) <ul style="list-style-type: none"> <li>• GNR 517 Listing Notice 1 Activity 20</li> </ul>	Part A(1)(d)(i) Listed and specified activities.	Application for environmental authorisation submitted to DMRE-NC  Ref No: NC30/5/1/2/2/14025PR
National Environmental Management: Air Quality Control Act, 2004 (Act No 39 of 2004) read together with applicable amendments and regulations thereto specifically the National Dust Control Regulations, GN No R827.	Part A(1)(h)(iv)(1)(a) Type of environment affected by the proposed activity – <i>Air and Noise Quality.</i>  Part A(1)(h)(viii) The possible mitigation measures that could be applied on the level of risk – <i>Dust Handling.</i>	The mitigation measures proposed for the site consider the NEM: AQA, 2004 and the National Dust Control Regulations.

<b>APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT</b>  (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)	<b>REFERENCE WHERE APPLIED</b>	<b>HOW DOES THIS DEVELOPMENT COMPLY AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT.</b>  (E.g. in terms of the National Water Act a Water Use License has/has not been applied for)
National Environmental Management Act: Biodiversity Act, 2004 (Act No. 10 of 2004) read together with applicable amendments and regulations thereto.	Part A(1)(h)(iv)(1)(a) Type of environment affected by the proposed activity - <i>Biological Environment</i>  Part A(1)(h)(viii) The possible mitigation measures that could be applied on the level of risk – <i>Management of invader plant species.</i>	The mitigation measures proposed for the site includes specifications of the NEM:BA, 2004.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008) read together with applicable amendments and regulations thereto.  NEM: WA, 2008: National norms and standards for the storage of waste (GN 926)	Part A(1)(d)(ii) Description of the activities to be undertaken	The mitigation measures proposed for the site consider the NEM: WA.
National Heritage Resources Act. 1999 (Act No 25 of 1999).	Part A(1)(h)(iv)(1)(a) Type of environment affected by the proposed activity – <i>Human Environment</i>	The mitigation measures proposed for the site includes specifications of the NHRA, 1999.
Guideline on Need and Desirability	Part A(1)(f) Need and desirability of the proposed activities.	The need and desirability of the project was assessed in accordance with these guidelines.
The South African Constitution	Implied throughout the document	To be upheld throughout the EIA assessment, planning-, construction-, operational- and decommissioning phases.
Northern Cape Nature Conservation Act, 2009, the Northern Cape Planning and Development Act, 1998, and the prescribed assessment protocols under Government Gazette No. 320 of 2020	Implied throughout the document	To be upheld throughout the EIA assessment, planning-, construction-, operational- and decommissioning phases.
Northern Cape Planning and Development Act No 7 of 1998	Implied throughout the document	To be upheld throughout the EIA assessment, planning-, construction-, operational- and decommissioning phases.

<b>APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT</b>	<b>REFERENCE WHERE APPLIED</b>	<b>HOW DOES THIS DEVELOPMENT COMPLY AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT.</b>
(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)		(E.g. in terms of the National Water Act a Water Use License has/has not been applied for)
Northern Cape Nature Conservation Act No 9 of 2009	Implied throughout the document	To be upheld throughout the EIA assessment, planning-, construction-, operational- and decommissioning phases.
The prescribed protocols in terms of the EIA Regulations for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020)	Implied throughout the document	To be upheld throughout the EIA assessment, planning-, construction-, operational- and decommissioning phases.
Financial Provisioning Regulations, 2015 (as amended),	Part A(1)(h)(i)(l) Closure phase of the proposed activity	Application for environmental authorisation submitted to DMRE-NC to be applied throughout the EIA assessment, Closure phase.  Ref No: NC30/5/1/2/2/14025PR
Public Participation Guideline in terms of the NEMA EIA Regulations	Part A(1)(h)(ii) Details of the Public Participation Process Followed	Public participation was conducted in accordance with the guidelines published in terms of the NEMA EIA Regulations

**f) Need and desirability of the proposed activities.**

(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)

Table 5: Need and desirability determination.

1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES		
How will this development impact on the ecological integrity of the area?		
Question	Response	Level of Desirability
How were ecological integrity considerations taken into account?	<p>As discussed under <i>Part A(1)(g)(iv)(1)(a) Type of environment affected by the proposed activity</i>, prospecting of the proposed area will be performed over a period of 5 years and divided into three phases. The prospecting programme will consist of non-invasive and invasive exploration. Non-invasive prospecting activity is implemented to limit the environmental footprint experienced within the prospecting area and generally leaves little to no evidence of exploration activity. The Invasive exploration will however entail drilling and minimal trenching.</p> <p>Also refer to:</p> <ul style="list-style-type: none"> <li>Part A(1)(g)(i) Details of the development footprint alternatives considered.</li> <li>Part A(1)(g)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Vegetation.</li> <li>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk.</li> </ul>	Desirable
How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity?		
How will this development pollute and/or degrade the biophysical environment?		

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	occur, these are expected to be minimal and reversible due to the small-scale nature of the activities and the proactive measures in place. Prior to moving to the next drill block these sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners, thereby keeping the impact on the receiving environment as low as possible.	
What waste will be generated by this development?	The general waste generated by the prospecting activities mainly consist of items such as food wrappers of the drilling operators. This is kept within the site vehicles and daily removed from site. As mentioned earlier, hazardous waste is mainly the result of accidental spillages/breakdowns. Such contaminated areas are immediately (within first hour of the occurrence) cleaned and the contaminated soil is contained in a designated hazardous waste container that is daily (when applicable) removed, from where it is disposed of as hazardous waste at the nearest hazardous waste disposal site. The chemical toilet will be serviced by an accredited contractor. No waste is/will be disposed of or treated on site.	Highly Desirable
How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?	As per the screening report, the area has a majority low heritage impact with small section that show Very High sensitivity (these areas are to be completely avoided) but has a medium palaeontology sensitivity and according to the SAHRA Paleontological sensitivity map the study area extend over an area of insignificant/zero (grey) concern.  Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.	Could not be determined
How will this development use and/or impact on non-renewable natural resources?	The proposed development involves minimal use of non-renewable natural resources due to its small-scale prospecting activities and limited environmental footprint. Drilling activities will be carefully planned and restricted to designated areas, with	Could not be determined

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	a total disturbance of less than 0.3 hectares throughout the project's duration. By using targeted Reverse Circulation (RC) and Diamond (Core) drilling methods, resource use is optimized, and waste is minimized. The flexible placement of drill sites ensures sensitive areas and critical ecosystems are avoided, reducing the potential for ecological degradation or the unnecessary consumption of natural resources. This approach demonstrates a commitment to responsible resource exploration with minimal impact on non-renewable resources and the surrounding environment.	
How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?	The proposed prospecting activities are designed to have minimal impact on renewable natural resources and the surrounding ecosystem. No electricity will be used during operations, further reducing environmental impact. Water required for drilling will be sourced from authorized suppliers, ensuring compliance with water-use regulations and minimizing strain on local water resources. Additionally, all drilling sites will be carefully planned to avoid sensitive areas, with specialists conducting pre-activity walk-throughs to identify ecologically significant zones. By following these measures, the prospecting activities align with sustainable resource use and aim to avoid any long-term negative effects on the ecosystem. The project's need and desirability lie in its potential to contribute to the understanding and sustainable extraction of mineral resources while demonstrating a commitment to environmental stewardship.	Highly Desirable
How were a risk-averse and cautious approach applied in terms of ecological impacts?	The need and desirability of the proposed project lie in its potential to contribute to mineral resource development while maintaining a commitment to environmental sustainability. By adopting a risk-averse and cautious approach, the project has prioritized ecological preservation from the outset. Sensitive areas will be identified and designated as no-go zones through specialist walk-throughs before any invasive activities occur. Additionally, the flexibility to adjust drill site locations ensures that sensitive habitats are avoided, minimizing potential ecological impacts. The small-scale and temporary nature of the disturbances, coupled with the implementation of rigorous mitigation measures and monitoring programs, underscores the project's commitment to sustainable practices. These measures, including detailed assessments during the Environmental	Desirable



### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	Impact Assessment (EIA) phase and iterative refinement of drilling plans based on specialist recommendations, provide assurance that ecological impacts can be fully mitigated while achieving the project objectives.	
How will the ecological impacts result from this development impact on people's environmental right?	The need and desirability of the proposed prospecting activities are underscored by their minimal environmental footprint and the commitment to avoid sensitive areas. With a cumulative disturbance of less than 0.3 hectares across the entire prospecting area and the flexibility to adjust drilling sites to avoid ecological sensitive zones, the project aligns with sustainable development principles. Should the prospecting activities be approved, potential visual, dust, and noise impacts are expected to be of very low significance. Furthermore, the implementation of proposed mitigation measures and monitoring programs will ensure that no environmental rights of surrounding residents or the public are adversely affected. By proactively addressing ecological concerns and avoiding sensitive areas, the project demonstrates that ecological impacts will be fully mitigated, preserving the surrounding environment and safeguarding the environmental rights of all stakeholders.	Highly Desirable
Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts.	The proposed prospecting activities are considered necessary and desirable for supporting economic development and contributing to the local economy through job creation and potential resource extraction. Given the minimal environmental disturbance, the activities have been carefully designed to avoid sensitive areas and mitigate ecological impacts. Should the prospecting activities be approved, potential visual, dust, and noise impacts will be of very low significance due to the implementation of mitigation measures and monitoring programs outlined in this document. These measures are expected to ensure that the environmental rights of surrounding residents and the public remain unaffected.	Desirable
Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	The linkages between human well-being, livelihoods, and ecosystem services in this area are critical, as ecosystems provide essential resources and regulate environmental quality. By avoiding sensitive areas and keeping ecosystem services, the project aims to minimize disruptions to livelihoods dependent on these services. Furthermore, adherence to mitigation measures will help ensure that the ecological impacts do not result in significant socio-economic consequences, safeguarding both the environment and the well-being of local communities.	

## 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified, resulted in the selection of the “best practicable environmental option” in terms of ecological considerations	Based on the above considerations, the development is unlikely to negatively affect the ecological integrity objectives or targets of the area. Instead, it demonstrates a balanced approach to resource use and environmental protection, with strict measures in place to protect sensitive areas. This careful planning ensures that the ecological and socio-economic impacts are minimized, supporting sustainable development in the region.	

## 2. PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT

What is the socio-economic context of the area?

Question	Response	Level of Desirability
What is the socio-economic context of the area?	Please refer to Heading 2(h)(iv)(1)(a) Socio-economic Environment.	Highly Desirable
Considering the socio-economic context, what will the socio-economic impacts be of the development, and specifically also on the socio-economic objectives of the area?	The socio-economic impacts of the proposed development are expected to be generally positive, particularly in terms of local economic stimulation and job creation. The development has the potential to provide employment opportunities during the prospecting phase, including skilled and unskilled positions, which could benefit local communities and reduce unemployment rates in the area. Additionally, any services required for the project, such as transportation, supplies, or maintenance, could support local businesses and contribute to the local economy.	

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	<p>From a broader socio-economic perspective, the project aligns with the area's objectives of fostering sustainable development and economic growth. By ensuring minimal environmental disturbance and adhering to mitigation measures, the development seeks to balance economic benefits with the preservation of natural resources. This approach helps maintain the ecosystem services upon which many livelihoods in the region depend, such as agriculture, water resources, and biodiversity-related tourism.</p> <p>By prioritizing the avoidance of sensitive areas and implementing strict ecological safeguards, the project minimizes the risk of adverse impacts on the environment that could have downstream socio-economic consequences, such as the loss of agricultural productivity or harm to natural resources critical to the community.</p> <p>The development supports socio-economic objectives by promoting responsible resource use, creating economic opportunities, and preserving ecosystem integrity, which together contribute to the long-term well-being and sustainability of the local population.</p>	
How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	If the proposed mitigation measures and monitoring programs, as proposed in this document, is implemented, it is believed that the prospecting activities will not affect the physical, psychological, cultural or social needs of the community in a negative manner, nor will it impact negatively on the socio-economic status of the area.	Highly Desirable
Will the development result in equitable impact distribution, in the short- and long-term?	The prospecting activities proposes to operate in a socially and economically sustainable manner during both the short- and long term.	Highly Desirable

## 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
In terms of location, describe how the placement of the proposed development will contribute to the area.	<p>The prospecting methodology for this area will focus on advanced geological surveying and sampling techniques to evaluate the uranium potential in the late-stage intrusions of U-rich leucogranite and high heat-producing granitic plutons. Remote sensing and geophysical surveys, such as gamma-ray spectrometry, will help delineate zones enriched in uranium, thorium, and potassium. This will be complemented by core drilling and geochemical analysis to confirm resource grades and reserves. The targeted commodity is uranium, which is vital for nuclear energy production. The proposed development, strategically located within the high-heat-producing zones, will contribute significantly to the region by fostering economic growth through mining activities, creating jobs, and potentially providing resources for renewable energy applications. Additionally, the project's infrastructure and investments can stimulate local development, improve accessibility, and support further geological research in the area.</p> <p>Availability of the mineral resource will only be determined should prospecting be granted and drilling can take place.</p>	Highly Desirable
How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	No negative socio-economic impacts could, at this stage, be identified that cannot be managed through the implementation of mitigation measures.	Highly Desirable
How will the socio-economic impacts result from this development impact on people's environmental right?	As mentioned in Heading 3(j)(1) <i>Impact on the socio-economic condition of any directly affected person</i> , the activity may have an impact on the visual characteristics of the surrounding environment and may potentially affect air quality and possibly the noise ambiance of the study area. However, should the prospecting activities be approved the potential visual-, dust-, and noise impacts associated with the proposed activity will be of very low significance. If the proposed mitigation measures and monitoring programs, as proposed in this document, is implemented, it is believed that no environmental rights of the surrounding residents/public will be affected by the socio-economic impacts associated with the proposed activity.	Highly Desirable

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts?	As mentioned above should the prospecting activities be approved the potential visual-, dust-, and noise impacts associated with the proposed activity will be of very low significance. If the proposed mitigation measures and monitoring programs, as proposed in this document, is implemented, it is believed that no environmental rights of the surrounding residents/public will be affected by the socio-economic impacts associated with the proposed activity.	Highly Desirable
What measures were taken to pursue the selection of the “best practicable environmental option” in terms of socio-economic considerations?	Please refer to: <ul style="list-style-type: none"> <li>• Part A(1)(g)(vii) The positive and negative impacts that the proposed activity and alternatives will have on the environmental and the community that may be affected.</li> </ul>	Highly Desirable
What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons?		
What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure	The prospecting site will (if approved) operate in accordance with, amongst others, the following: <ul style="list-style-type: none"> <li>• CARA, 1983 – to ensure agriculture related compliance;</li> </ul>	Highly Desirable

**1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES**

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
<p>human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p> <p>What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</p>	<ul style="list-style-type: none"> <li>• Financial Provision Regulations, 2015 – to ensure compliance in terms of rehabilitation;</li> <li>• Mine Health and Safety Act, 1996 (as amended) – to ensure employee safety;</li> <li>• MPRDA, 2002 (as amended) – to ensure prospecting related compliance;</li> <li>• NEM: AQA, 2004 – to ensure air quality related compliance;</li> <li>• NEM:BA, 2004 – to ensure biodiversity related compliance;</li> <li>• NEM: WA, 2008 – to ensure waste related compliance; and</li> <li>• NEMA, 1998 (as amended) – to ensure environmental related compliance;</li> </ul>	
<p>Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community that is consistent with the priority needs of the local area.</p>	<p>The proposed prospecting activities are essential to determine the presence and viability of mineral resources, providing valuable geological data that could support economic development in the local area. The activities are designed with minimal ecological disturbance, involving small, temporary drill sites (10m x 10m), limited vegetation clearance, and no bulk sampling or permanent infrastructure. Ecological integrity will be preserved by avoiding sensitive areas such as wetlands and habitats for species of conservation concern, as identified through specialist walk-throughs. This ensures that the biodiversity of the area remains intact, and any disturbed areas will be rehabilitated post-activity.</p> <p>The development aligns with the interests and needs of the local community by creating short-term employment opportunities and potential long-term economic benefits if viable mineral deposits are found. Engagements with landowners ensure that the project respects local land use priorities, and the use of existing infrastructure minimizes disruption to daily activities.</p>	<p>Highly Desirable</p>

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	The methodology involves a combination of non-invasive techniques and invasive Reverse Circulation (RC) and Diamond Core drilling methods to collect core samples for analysis. These methods are precise and efficient, generating minimal waste and surface impact. The primary commodity being prospected will depend on the geological target of the area, such as base metals, precious minerals, or industrial resources. This approach ensures that the prospecting process is environmentally conscious while addressing the economic priorities of the region.	
What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected.	The prospecting right activities will be in accordance with the specifications of the Mine Health and Safety Act, 1996. Site management will have daily discussions with the drill rig operators regarding the work to be performed and the environment in which the work will take place. Grievances/concerns can be lodged during the daily site meetings.	Highly Desirable
Describe how the development will impact on job creation in terms of, amongst other aspects?	As mentioned earlier, should this prospecting right be approved, the applicant will be able to, <ul style="list-style-type: none"> <li>• Prospect for the applied mineral resources.</li> <li>• Determine the available mineral resources as well as provide employment opportunities to local employees.</li> <li>• It will also diversify the income of the property as well as potential employees and clients.</li> </ul>	Highly Desirable

### 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
	<p>The project has the potential to create job opportunities, including temporary employment during the drilling phases, which can benefit local communities through skills development and economic stimulation. Discussions with landowners and affected parties ensure that the project aligns with the interests and values of stakeholders. Moreover, the minimal disturbance and adaptability of site layouts allow for integration with existing land uses, maintaining compatibility with the community's priorities, such as agricultural productivity and environmental preservation.</p> <p>In considering the priority needs of the area, the project emphasizes sustainable practices, adherence to environmental regulations, and the protection of sensitive ecosystems. This ensures that all segments of the community can benefit from economic opportunities while safeguarding long-term environmental and social well-being.</p>	
<p>What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage.</p>	<p>Should the prospecting right be approved, the activities will operate under a valid prospecting right issued by the DMRE. Compliance of the prospecting right with the approval conditions can be reported on as per the departmental specifications and be managed in accordance with all the prospecting right and environmental related legislations.</p>	Highly Desirable
<p>Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left.</p>	<p>It is believed that the mitigation measures proposed in this document is realistic and can be implemented (when and if applicable) by the proposed activities. If the proposed mitigation measures and monitoring programs, as proposed in this document, is implemented, the residual impact on the environment is of low significance.</p>	Highly Desirable



## 1. SECURING ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

How will this development impact on the ecological integrity of the area?

Question	Response	Level of Desirability
<p>What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution environmental damage or adverse health effects will be paid for by those responsible for harming the environment.</p>	<p>In terms of Section 41 of the MPRDA, 2002 a prospecting right holder must submit a financial provision to the DMRE that is sufficient to rehabilitate or manage the negative environmental impacts related to the prospecting activity.</p>	Highly Desirable
<p>Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified, resulted in the selection of the best practicable environmental option in terms of socio-economic considerations</p>	<p>Please refer to:</p> <ul style="list-style-type: none"> <li>• Part A(1)(g)(i) Details of the development footprint alternatives considered.</li> <li>• Part A(1)(g)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Socio-Economic Environment.</li> <li>• Part A(1)(g)(vii) The positive and negative impacts that the proposed activity and alternatives will have on the environmental and the community that may be affected.</li> </ul>	Highly Desirable
<p>Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area.</p>	<p>If the proposed mitigation measures and monitoring programs, as proposed in this document, is implemented, it is believed that the prospecting activities will not cause a cumulative socio-economic impact should the prospecting right application be approved, seeing that there are no other rated activities in the vicinity.</p>	Highly Desirable

### **g) Motivation for the overall preferred site, activities and technology alternative.**

The preferred site, activities, and technology alternatives for the proposed prospecting project were selected to balance operational feasibility with environmental responsibility. The chosen approach integrates non-invasive and invasive techniques to minimize environmental disturbance while effectively meeting geological objectives. Non-invasive activities such as desktop geological studies, surface mapping, and radon emanometry will guide the identification of target areas, ensuring that invasive prospecting is focused and efficient. Invasive methods, limited to small-scale drilling using Reverse Circulation (RC) and Diamond (Core) techniques, will be carried out on sites carefully planned to avoid sensitive areas. The project's minimal disturbance footprint, with a cumulative affected area of less than 0.3 hectares over its lifespan, reflects a commitment to environmental preservation. Drill sites, occupying just 10m x 10m each, are temporary and strategically located following specialist walk-through assessments to designate no-go zones. The absence of bulk sampling, permanent infrastructure, and reliance on existing roads further mitigate potential impacts. This adaptive approach, coupled with detailed planning aligned with the SAMREC code, ensures that prospecting activities remain environmentally responsible while achieving the necessary technical outcomes to define potential mineral resources.

### **h) Full description of the process followed to reach the proposed preferred alternatives within the site.**

NB!! – This section is about the determination of the specific site layout and the location of infrastructure and activities on site, having taken into consideration the issues raised by interested and affected parties, and the consideration of alternatives to the initially proposed site layout.

#### **i) Details of the development footprint alternatives considered.**

With reference to the site plan provided as Appendix C and the location of the individual activities on site, provide details of the alternatives considered with respect to:

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity;
- (e) the operational aspects of the activity; and
- (f) the option of not implementing the activity.

#### **Determination of Specific Site Layout and Location of Infrastructure and Activities**

The determination of the site layout and placement of infrastructure for the proposed prospecting activities on farm 622 (83,954 ha) in the Namaqualand Magisterial District, Northern Cape, was guided by a systematic, inclusive, and iterative process. This process incorporated technical, environmental, and social considerations while addressing concerns raised by interested and affected parties (I&APs).

#### **1. Incorporating Stakeholder Input and Environmental Sensitivity**

Input from I&APs was central to refining the site layout. Concerns related to environmental sensitivity, land access, and social impacts were assessed to minimize disruptions and avoid high-sensitivity areas. Adjustments were made to the initial layout to accommodate these concerns, ensuring that the prospecting footprint respects ecological and socio-economic priorities.

Key adjustments included:

Avoiding sensitive areas identified through desktop studies, field mapping, and stakeholder feedback, such as ecologically fragile zones and sites of cultural significance.

Ensuring access to infrastructure is planned around existing roads to minimize environmental disturbance and comply with logistical requirements.

## 2. Consideration of Alternatives to the Initial Layout

Alternatives to the initial proposed site layout were considered to strike a balance between operational feasibility and environmental sustainability. This included:

Relocating prospecting sites based on field observations and geophysical data, ensuring accessibility and reduced environmental impact.

Opting for temporary site infrastructure, such as fenced laydown areas and portable offices, to eliminate the need for permanent installations.

Utilizing centralized camps and chemical ablutions to minimize infrastructure footprint.

## 3. Phased Implementation Approach

The layout was further refined by implementing a phased approach to activities:

### Phase 1: Non-invasive activities

Non-invasive activities such as database compilation, remote sensing, and geophysical surveys will be conducted first. These activities will guide the optimal placement of future invasive operations.

### Phase 2: Invasive activities

Target and infill drilling will be strategically initiated in areas identified as high-potential zones. The exact locations will be determined based on:

Analysis of historical exploration data.

Results from non-invasive activities, including geochemical and geophysical surveys.

Accessibility, logistical feasibility, and input from landowners.

#### 4. Adherence to Environmental Management and Rehabilitation Plans

All prospecting areas will be planned and rehabilitated in consultation with landowners and in accordance with mitigation measures to minimize environmental impact. This ensures that the temporary disturbances from drilling activities are promptly addressed before moving to new locations.

#### 5. Mitigation of Impact Through Design

Disturbance from borehole drilling will be restricted to a maximum of 0.3 ha across the entire prospecting area.

Existing roads will be utilized to reduce the need for new access routes.

All chemicals and hydrocarbons will be stored in bunded, impermeable areas to prevent contamination.

#### Conclusion

The process to define the site layout and activity locations prioritized environmental stewardship, operational efficiency, and stakeholder engagement. By adapting to the findings of ongoing studies and incorporating public input, the finalized plan ensures minimal disruption to the environment and communities while enabling effective exploration for uranium ore.

**Site Alternative 1 (S1) (Preferred and Only Site Alternative):** Site Alternative 1 entails the prospecting area for Uranium Ore within the GPS coordinates as listed in the table below. Refer to figure 1.

*Table 6: GPS Coordinates of Site Alternative 1 (preferred and only site alternative)*

Name	DEC DEGREES	
	LAT	LONG
1	29.5097443349	17.7759858645
2	29.4934897491	17.7766298677
3	29.4402237023	17.8133380541
4	29.3538172444	17.8397421881
5	29.3369762773	17.8500462404
6	29.3122711592	17.9389186916
7	29.2903684395	17.9917269597
8	29.2684610220	18.0851074338
9	29.2987931185	18.0831754240
10	29.2898067695	18.1044275318
11	29.2690228093	18.1192396070
12	29.2549772003	18.1585238065
13	29.2381199233	18.1437117313
14	29.1841579829	18.1385597051
15	29.1588535449	18.2383802119
16	29.2482346228	18.2963405061
17	29.26733774381	18.1701158653
18	29.2802579073	18.17526778915
19	29.2780109865	18.1488637574
20	29.3089018158	18.0805994109
21	29.3914186862	18.0767353913

22	29.5018976192	18.0644993291
23	29.5271170409	18.0561272866
24	29.5708158129	18.0252151297
25	29.5736163717	17.9479347374
26	29.5640941548	17.8461822208
27	29.5007766102	17.8172020737

### **Layout Alternative**

During the EIA phase, the potential impact of the proposed activities on the receiving environmental were assessed. Considering the minimal environmental disturbance expected from the proposed drilling activities, a layout alternative has been proposed to allow flexibility in the placement of drill sites. This alternative is motivated by the need to avoid sensitive areas and ensure that ecological impacts are minimized. Since drill sites can be adjusted based on sensitivity and accessibility, the layout will be dynamic, with drill holes being moved if necessary to bypass sensitive zones with significant ecological value. This approach ensures that potential environmental impacts, such as damage to important habitats or ecosystems, are avoided. By adopting a flexible layout, the project can maintain its objectives while adhering to ecological and socio-economic considerations, thus supporting sustainable development without compromising the integrity of the surrounding environment.

Before any invasive activities commence, a walk-through will be conducted by specialists, to identify and designate sensitive areas as no-go zones. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations.

**No-go Alternative:** The no-go alternative entails no change to the status quo and is therefore a real alternative that must be considered.

- The applicant will not be able to prospect for any possible Uranium Ore resources;
- The application, if approved, would allow the applicant to determine the available minerals as well as provide employment opportunities to local employees.
- Should the no-go alternative be followed, these opportunities will be lost to the applicant, potential employees; and the applicant will not be able to diversify the income of the property.

Not proceeding with the proposed operation will entail that a mineral which if found will contribute towards the local and provincial social and economic structures of the area, will not be prospected, and that this opportunity will be lost.

In light of this, the no-go alternative was not deemed to be the preferred alternative.

**ii) 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 or not 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.

During this public participation process the relevant stakeholders and I&APs were informed of the project by means of an advertisement in the Gemsbok Newspaper on 6 December 2024, Site notices were placed in Afrikaans and English in Concordia and at the farm boundary fences.

Flyers containing project information were distributed in the rural community of Kommagas, Springbok and Concordia. For more details, please refer to Appendix E.

A notification letter inviting comments on the DBAR over a 30-days commenting period (6 December 2024 to 30 January 2025) will be send to the landowners, neighbouring landowners, stakeholders, and other I&AP that may be interested in the project. The comments received on the DBAR were incorporated into the final Basic Assessment Report (FBAR) to be submitted to the DMRE for consideration. The following I&APs and stakeholders will be informed of the project:

*Table 7: List of the I&AP's and stakeholders that were notified of the proposed prospecting right project.*

SURROUNDING LANDOWNERS & INTERESTED AND AFFECTED PARTIES	STAKEHOLDERS
<ul style="list-style-type: none"> <li>• Steinkopf 22 Portion 0</li> <li>• Steinkopf 22 Portion 271</li> <li>• Steinkopf 22 Portion 271</li> <li>• Steinkopf 22 Portion 273</li> <li>• Steinkopf 22 Portion 274</li> <li>• Steinkopf 22 Portion 275</li> <li>• Steinkopf 22 Portion 276</li> <li>• Steinkopf 22 Portion 277</li> <li>• Steinkopf 22 Portion 278</li> <li>• Steinkopf 22 Portion 279</li> <li>• Steinkopf 22 Portion 280</li> <li>• Steinkopf 22 Portion 275</li> <li>• Steinkopf 22 Portion 388</li> <li>• Steinkopf 22 Portion 389</li> <li>• Steinkopf 22 Portion 390</li> </ul>	<ul style="list-style-type: none"> <li>• Department of Agriculture, Environmental Affairs, Rural Development and Land Reform - Kimberley</li> <li>• Department of Agriculture, Environmental Affairs, Rural Development and Land Reform – Kimberley</li> <li>• Department of Agriculture, Environmental Affairs</li> <li>• Rural Development and Land Reform - Springbok</li> <li>• Department of Economic Development and</li> <li>• Tourism - Kimberley</li> <li>• (DEDAT) Department of Economic Development and Tourism - Upington</li> <li>• Department of Roads and Public Works - Upington</li> <li>• Department of Roads and Public Works - Springbok</li> <li>• Department of Water and Sanitation (DWS)</li> <li>• Department of Water and Sanitation - Upington</li> <li>• Department of Labour (DLCC)</li> </ul>

SURROUNDING LANDOWNERS & INTERESTED AND AFFECTED PARTIES	STAKEHOLDERS
<ul style="list-style-type: none"> <li>• Steinkopf 22 Portion 391</li> <li>• Steinkopf 22 Portion 392</li> <li>• Steinkopf 22 Portion 393</li> <li>• Steinkopf 22 Portion 445</li> <li>• Steinkopf 22 Portion 446</li> <li>• Steinkopf 22 Portion 447</li> <li>• Heiorigas 49 Portion 0</li> <li>• Heiorigas 49 Portion 1</li> <li>• Kabib 50 Remaining Extent</li> <li>• Kabib 50 Portion 1</li> <li>• Nooisabes 51 Portion 0</li> <li>• Eendop 69 Remaining Extent</li> <li>• Eendop 69 Portion 1</li> <li>• Gezelschap Bank 71 Remaining Extent</li> <li>• Gezelschap Bank 71 Portion 2</li> <li>• Kontorogab 72 Remaining Extent</li> <li>• Kontorogab 72 Portion 2</li> <li>• Kweekfontein 73 remaining Extent</li> <li>• Kweekfontein 73 Portion 1</li> <li>• Kweekfontein 73 Portion 2</li> <li>• Kweekfontein 73 Portion 3</li> <li>• Ratelkraal 131 Remaining Extent</li> <li>• Melkboschkuil 132, Remaining extent</li> <li>• Melkboschkuil 132 Portion 27</li> <li>• Melkboschkuil 132 Portion 28</li> <li>• Brakfontein 133 remaining Extent</li> <li>• Brakfontein 133 Portion 9</li> <li>• Brakfontein 133 Portion 10</li> <li>• Nababeep 134 Remaining Extent</li> <li>• Nababeep 134 Portion 13</li> <li>• Nababeep 134 Portion 13</li> <li>• Nababeep 134 Portion 14</li> <li>• Nababeep 134 Portion 15</li> <li>• Nababeep 134 Portion 21</li> <li>• Plaatjesfontein 135 Remaining Extent</li> <li>• Farm 635 remaining extent</li> <li>• Farm 643 remaining extent</li> <li>• Namaqualand Road 643 remainder extent</li> </ul>	<ul style="list-style-type: none"> <li>Northern Cape Provincial Office</li> <li>• Department of Labour - Springbok</li> <li>• Namakwa District Municipality</li> <li>• Nama Khoi Local Municipality</li> <li>• Nama Khoi Local Municipality Ward 1&amp; 6</li> <li>• Sanral</li> <li>• Regional Land Claims Commission Northern Cape</li> <li>• Eskom</li> <li>• South African Heritage Resources Agency</li> <li>• National Protected Area Expansion Strategy – Northern Cape</li> </ul>

In accordance with the timeframes stipulated in the EIA Regulations of December 2014 (as amended) the Draft Basic Assessment Report (DBAR) was compiled and distributed for comment and perusal to the I&AP’s and stakeholders listed above. A 30-day commenting period, ending 30 January 2025, was allowed for perusal of the documentation and submission of comments. The comments received on the Draft Basic Assessment Report (DBAR), as part of this process, were incorporated into the Final Basic Assessment Report (FBAR), the FBAR will be submitted to the competent authority for final decision making. Proof of such consultation, which proof includes personal information of Interested & Affected Party (“participants”), will be limited to departmental documentation only, which information shall not be distributed as part of



the public documentation in terms of the Prospecting Right application process. The above is implemented to ensure the protection of personal information of participants, in line with the Protection of Personal Information Act 4 of 2013 (“POPIA”), including the lawful processing of said personal information by Greenmined Environmental (Pty) Ltd (“Greenmined”), to which processing of personal information all participants consented to upon registration as participant. Participants that would like to inquire regarding specific information can do so by contacting Greenmined and by providing the necessary consent that authorises such an individual to obtain said specific information.

Refer to the following table for an explanation on how the public participation process of this project took the methods stipulated in Regulation 41 of the NEMA Regulations into account. Proof of the public participation process that was followed is attached as Appendix E to this document.

*Table 8: Table comparing the required methods with the public participation process of this project.*

<p align="center"><b>REQUIREMENTS IN TERMS OF NEMA REGULATION 41</b></p>	<p align="center"><b>PUBLIC PARTICIPATION PROCESS FOLLOWED</b></p>
<ul style="list-style-type: none"> <li>• Regulation 41(2)(a): <i>Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of-</i> <ul style="list-style-type: none"> <li>(i) <i>The site where the activity to which the application or proposed application relates is or is to be undertaken; and</i></li> <li>(ii) <i>Any alternative site.</i></li> </ul> </li>   <li>• Regulation 41(3): <i>A notice, notice board or advertisement referred to in sub regulation (2) must—</i> <ul style="list-style-type: none"> <li>(a) <i>give details of the application or proposed application which is subjected to public participation; and</i></li> <li>(b) <i>state—</i> <ul style="list-style-type: none"> <li>(i) <i>whether basic assessment or S&amp;EIR procedures are being applied to the application.</i></li> <li>(ii) <i>the nature and location of the activity to which the application relates.</i></li> <li>(iii) <i>where further information on the application or proposed application can be obtained; and</i></li> <li>(iv) <i>the manner in which and the person to whom representations in respect of the</i></li> </ul> </li> </ul> </li> </ul>	<p>Notice boards in both English and Afrikaans were fixed at the following conspicuous and public accessible areas:</p> <ul style="list-style-type: none"> <li>• CONCORDIA HIGH SCHOOL</li> <li>• USAVE</li> <li>• CALVYN PROTESTANT CHURCH</li> <li>• CHINA SHOP</li> <li>• ALONG THE FENCE OF THE N7 (-29.564159°; 17.868051°) (PROPERTY BOUNDARY)</li> </ul> <p>All the notice boards that were placed complied with the requirements of Regulation 41(3) as presented in Appendix E2 attached to this document.</p> <p>The notices were printed on boards of 60 x 42 cm in Arial font of sufficient size.</p>

REQUIREMENTS IN TERMS OF NEMA REGULATION 41	PUBLIC PARTICIPATION PROCESS FOLLOWED
<p><i>application or proposed application may be made.</i></p> <ul style="list-style-type: none"> <li>• Regulation 41(4): A notice board referred to in sub regulation (2) must— <ul style="list-style-type: none"> <li>(a) be of a size of at least 60cm by 42cm; and</li> <li>(b) display the required information in lettering and in a format as may be determined by the competent authority.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Regulation 41(2)(b): <i>giving written notice, in any of the manners provided for in section 47D of the Act, to-</i> <ul style="list-style-type: none"> <li>(i) <i>the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken.</i></li> <li>(ii) <i>owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken.</i></li> <li>(iii) <i>the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area.</i></li> <li>(iv) <i>the municipality which has jurisdiction in the area.</i></li> <li>(v) <i>any organ of state having jurisdiction in respect of any aspect of the activity.</i></li> <li>(vi) <i>any other party as required by the competent authority;</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>(i) The Landowner (and Applicant) signed an agreement regarding this project and is kept apprised of the EIA (BA) process. To date, no additional comments were received.</li> <li>(ii) The surrounding landowners were invited to comment on the project and the DBAR.</li> <li>(iii) The Ward Councillor were invited to comment on the project and DBAR.</li> <li>(iv) Both the Nama Khoi Local Municipality and the Namakwa District Municipality were invited to comment on the project and DBAR.</li> <li>(i) As listed in Table 7 the relevant state departments and entities will be invited to comment on the project and DBAR.</li> </ul>
<ul style="list-style-type: none"> <li>• Regulation 41(2)(c): <i>Placing an advertisement in-</i> <ul style="list-style-type: none"> <li>(i) <i>One local newspaper; or</i></li> <li>(ii) <i>any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The project and availability of the DBAR was advertised in the Gemsbok Newspaper in both English and Afrikaans.</li> </ul>
<ul style="list-style-type: none"> <li>• Regulation 41(2)(d): <i>Placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken...</i></li> </ul>	<p>Not applicable, as the proposed activity will not extend beyond the boundaries of the metropolitan or district municipality in which it will be undertaken.</p>

REQUIREMENTS IN TERMS OF NEMA REGULATION 41	PUBLIC PARTICIPATION PROCESS FOLLOWED
<ul style="list-style-type: none"> <li>Regulation 41(2)(e): <i>Using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to—</i> <ul style="list-style-type: none"> <li>(i) illiteracy.</li> <li>(ii) disability; or</li> <li>(iii) any other disadvantage.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The ward councillor was informed of the project and availability of the DBAR,</li> <li>A hard copy of the DBAR will be available on request for the public that does not have access to the internet. The availability of the DBAR was advertised in all the public participation documents that were distributed.</li> </ul>
<ul style="list-style-type: none"> <li>Regulation 41(5): <i>Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d) ...</i></li> </ul>	<ul style="list-style-type: none"> <li>Not applicable to this application.</li> </ul>
<ul style="list-style-type: none"> <li>Regulation 41(6): <i>When complying with this regulation, the person conducting the public participation process must ensure that—</i> <ul style="list-style-type: none"> <li>(a) <i>information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and</i></li> <li>(b) <i>participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The DBAR containing all relevant facts in respect of the application will be made available to potential I&amp;APs for perusal and commenting over a 30-days commenting period. The DBAR will be available on the company (Greenmined) website as well as in hard copy in the application area. I&amp;AP's were invited to contact the EAP should additional information be required.</li> </ul>
<ul style="list-style-type: none"> <li>Regulation 41(7): <i>Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.</i></li> </ul>	<ul style="list-style-type: none"> <li>Not applicable to this project.</li> </ul>

### iii) Summary of issues raised by I&APs

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

*Tables 9: Summary of issues raised by IAPs on DBAR- Please note that the contact details of all relevant contact persons have been omitted from this report to comply with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (POPIA). These details will only be made available to the Department of Mineral Resources and Energy (DMRE) to ensure the protection of personal information in accordance with the Act.*

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
<b>AFFECTED PARTIES</b>	X			
Landowner/s				
• Farm 622	X			
<b>Landowners or lawful occupiers on adjacent properties</b>	X			
• Steinkopf 22 Portion 0	X			
• Steinkopf 22 Portion 271	X			
• Steinkopf 22 Portion 271	X			
• Steinkopf 22 Portion 273	X			
• Steinkopf 22 Portion 274	X			
• Steinkopf 22 Portion 275	X			
• Steinkopf 22 Portion 276	X			
• Steinkopf 22 Portion 277	X			
• Steinkopf 22 Portion 278	X			
• Steinkopf 22 Portion 279	X			

The CPA (Communal Property Association), as the representative of the landowners and adjacent farm owners, was the primary contact for engagement regarding the proposed prospecting right project. The CPA informed Greenmined that they would act on behalf of the landowners, surrounding landowners, and other interested and affected parties. Notifications about the proposed project were shared with all relevant stakeholders, and the CPA ensured their involvement in the process. No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.

<b>Interested and Affected Parties</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
<b>List the name of persons consulted in this column, and</b>					
<b>Mark with an X where those who must be consulted were in fact consulted</b>					
• Steinkopf 22 Portion 280	X				
• Steinkopf 22 Portion 275	X				
• Steinkopf 22 Portion 388	X				
• Steinkopf 22 Portion 389	X				
• Steinkopf 22 Portion 390	X				
• Steinkopf 22 Portion 391	X				
• Steinkopf 22 Portion 392	X				
• Steinkopf 22 Portion 393	X				
• Steinkopf 22 Portion 445	X				
• Steinkopf 22 Portion 446	X				
• Steinkopf 22 Portion 447	X				
• Heiorigas 49 Portion 0	X				
• Heiorigas 49 Portion 1	X				
• Kabib 50 Remaining Extent	X				
• Kabib 50 Portion 1	X				
• Nooisabes 51 Portion 0	X				
• Eendop 69 Remaining Extent	X				

<b>Interested and Affected Parties</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
<b>List the name of persons consulted in this column, and</b>					
<b>Mark with an X where those who must be consulted were in fact consulted</b>					
• Eendop 69 Portion 1	X				
• Gezelschap Bank 71 Remaining Extent	X				
• Gezelschap Bank 71 Portion 2	X				
• Kontorogab 72 Remaining Extent	X				
• Kontorogab 72 Portion 2	X				
• Kweekfontein 73 remaining Extent	X				
• Kweekfontein 73 Portion 1	X				
• Kweekfontein 73 Portion 2	X				
• Kweekfontein 73 Portion 3	X				
• Ratelkraal 131 Remaining Extent	X				
• Melkboschkuil 132, Remaining extent	X				
• Melkboschkuil 132 Portion 27	X				
• Melkboschkuil 132 Portion 28	X				
• Brakfontein 133 remaining Extent	X				
• Brakfontein 133 Portion 9	X				

<b>Interested and Affected Parties</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
List the name of persons consulted in this column, and					
Mark with an X where those who must be consulted were in fact consulted					
• Brakfontein 133 Portion 10	X				
• NababEEP 134 Remaining Extent	X				
• NababEEP 134 Portion 13	X				
• NababEEP 134 Portion 13	X				
• NababEEP 134 Portion 14	X				
• NababEEP 134 Portion 15					
• NababEEP 134 Portion 21					
• Plaatjesfontein 135 Remaining Extent	X				
• Farm 635 remaining extent	X				
• Farm 643 remaining extent	X				
• Namaqualand Road 643 remainder extent	X				
<b>Municipal councillor</b>					
Cllr. Cacilia Ancilwa Waterboer – Ward 1 & 6	X	No comments were received on the draft BAR to be incorporated into the final BAR.			
<b>Municipality</b>					

<b>Interested and Affected Parties</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
List the name of persons consulted in this column, and					
Mark with an X where those who must be consulted were in fact consulted					
Namakwa District Municipality	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
Nama Khoi Local Municipality	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
<b>Organs of state (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, DWA e</b>					
Department of Transport and Public Works - Upington	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
Department of Transport and Public Works - Kimberley					
Eskom	X	6/12/2024  18/12/24	Mr Mpolawa requested the KML file, which was sent to him the same day.  Eskom Distribution has evaluated your project and we can confirm that our Nama/Doringwater 1 66kV line and our Nama/Concordia 1 22kV Overhead Line will be affected by this project, the mining activities must be at least 15.5m away from our servitude to avoid electrocution, blasting must be at least 500m away from the line.	Thank you for your email and valued input. All comments received will be addressed and incorporated in the Final Basic Assessment Report.	Appendix E - Proof of public participation
SANRAL	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		



Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.	
Communities	X	To ensure comprehensive community engagement and inclusivity, communities in the area are contacted through Ward Councillors and the Communal Property Association (CPA). This dual approach helps reach all relevant stakeholders and ensures that no individuals or groups are omitted from the consultation process. Both the Ward Councillors and the CPA serve as key channels for communicating project details, collecting comments, and addressing concerns from the community. Feedback gathered through these representatives will be incorporated into the project planning and decision-making processes to promote transparency and community involvement.			
Dept. Land Affairs					
Department of Agriculture, Environmental Affairs Rural Development and Land Reform - Kimberley	X	30/1/2025	<p>1. In addition, approximately 72% of the proposed prospecting area is categorised as irreplaceable CBAs and 18% as highly important ESAs. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBAs considered as “no-go” areas for any development.</p> <p>2. Namaqualand Klipkoppe Shrubland, Namaqualand Blomveld, Bushmanland Arid Grassland and Bushmanland Inlegberg Shrubland are characterised by the presence of <i>Aliodendron dichotomum</i> (formerly known as <i>Aloe dichotoma var. dichotma</i>). It is currently listed as vulnerable (VU) and climate change models project a 36% decline in the species range within 100 years, assuming dispersal into newly suitable areas. In addition, there is a moratorium in place in the Northern Cape on the removal of <i>A. dichotomum</i> from the wild due to historic trade-related pressures on populations (Proclamation No. 968, 1 April 2005). All <i>A. dichotomum</i> individuals within close proximity to the planned development must be mapped in all documents going forward and regarded as no-go areas. Please</p>	<ul style="list-style-type: none"> <li>■ The DBAR acknowledges the ecological importance of the area, including its inclusion in the Priority Focus Area of the NPAES. As detailed on Page 82, the report explicitly outlines that prospecting activities are designed to minimize landscape disruption. The small footprint of less than 0.3 hectares for invasive activities (refer to Page 24) ensures that the ecological connectivity of the area remains intact. Additionally, specialist walk-throughs (see Page 86) will identify and avoid sensitive areas.</li> <li>■ The DBAR identifies that 72% of the prospecting area is categorized as irreplaceable CBAs and 18% as ESAs. As outlined on Page 86, the prospecting activities will carefully avoid sensitive areas, and specialists will conduct walk-throughs before invasive activities to ensure that CBAs and ESAs remain undisturbed. The use of flexible site planning (refer to Page 24) further emphasizes the commitment to reducing impacts.</li> </ul>	Appendix E - Proof of public participation

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
		<p>also note that <i>Boschia albitrunca</i> (Shepherd’s tree) is protected under the National Forest Act (Act No. 84 of 1998) and the Northern Cape Nature Conservation Act (Act No. 9 of 2009). If this species is noted in high abundance within the study area it must be indicated as such.</p> <p>3.The Bushmanland Inselberg Shrubland are important refugia for plants and animals and act as corridors for rocky habitat species migrating across the sands covered plain plains of the Bushmanland Sandy Grassland ecosystem. Based on their higher biodiversity and contribution to local habitat diversity, the rocky outcrops must be avoided by the development. This does not imply that plains habitats are of little ecological concern.</p> <p>4.Approximately 72% of the proposed prospecting area is categorized as irreplaceable CBA’s and 18 % as highly important Ecological Support Areas. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBA 1 considered as “no-go” areas for developments. Activities which may cause fragmentation of CBAs leading to loss of ecological connectivity are not supported. Specialist assessment(s) must be undertaken if any of the above-mentioned circumstance prevail or if there is any doubt about the biodiversity value of the potentially impacted areas. The opportunities and constraints of the receiving environments must be used to inform the desirability and layout of any development proposal to ensure that developments do not compromise the biodiversity value of the area. When assessing the impact of the</p>	<ul style="list-style-type: none"> <li>■ The DBAR recognizes the presence of vulnerable species, including <i>A. dichotomum</i> and <i>B. albitrunca</i>. On <b>Page 86</b>, it is highlighted that walk-through assessments will map sensitive species, designating them as no-go zones. The project adheres to the requirements of the Northern Cape Nature Conservation Act and the National Forest Act, as mentioned under mitigation measures on <b>Page 86</b> and in the EMPr (see <b>Page 160</b>).</li> <li>■ The DBAR concurs with the importance of these areas as biodiversity refugia. As detailed on Page 64, rocky outcrops will be avoided, and flexible drilling locations will be utilized to ensure minimal disruption. This approach is reinforced on Page 86, which emphasizes that specialist walk-throughs will guide the selection of non-sensitive sites for drilling.</li> <li>■ Specialist assessments will investigate ecological features of CBAs to inform site planning. As described on Page 86, sensitive areas will be excluded from prospecting activities, and project layouts will be refined to ensure connectivity remains intact. The report further commits to using a minimal footprint for all prospecting activities (see Page 24).</li> </ul>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date</b></p> <p><b>Comments</b></p> <p><b>Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
		<p>development on CBAs, the EAP must investigate the reasons (features) behind determination of the CBAs and critically assess whether these will be impacted negatively by the proposed construction and operational phase activities.</p> <p>5.Considering the landscape connectivity in terms water provisions and ecosystem services, the cumulative impacts of mining in the region is a concern. Cumulative impacts in relation to an activity are defined in the EIA Regulations (Government Notice R543) as meaning “the impact of an activity that itself may not be significant, but may have become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertaking in the area” Considering the competing land uses on farm 622, which include mining and prospecting right applications, livestock farming and renewable energy developments, cumulative impacts must be assess within the context of landscape connectivity.</p> <p>6.The screening report indicated important habitats for several species of conservation concern. DAERL does not support activities that may negatively impact on habitats and ecological functioning. Appropriate buffers must be determined by a suitable qualified specialist to avoid impacting on habitats and particular attention must be paid to avoiding the loss of intact habitat, maximizing habitat heterogeneity and reducing fragmentation at a local and regional scale. The buffers must guide the development plans to reduce any present and future impact on habitats. Once</p>	<ul style="list-style-type: none"> <li>█ Cumulative impacts are addressed in the DBAR on <b>Page 98</b>, where the report commits to assessing and mitigating these impacts in consultation with specialists. Given the limited scale of the prospecting activities, the overall contribution to cumulative impacts is expected to be negligible. Nonetheless, measures outlined in the EMPR (see <b>Page 160</b>) ensure ongoing monitoring and mitigation.</li> <li>█ The DBAR commits to determining appropriate buffers to protect habitats, as detailed on Page 86. Once invasive activities are planned, specialists will identify and map sensitive areas, ensuring that these are excluded from the prospecting footprint. These buffers will be included in the final project layout (see Page 86).</li> </ul>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
		<p>suitable buffers have been mapped it must be illustrated on a map and included in the application.</p> <p>7. Water is a limited resource in the Namaqualand region. Water requirements for proposed activities and potential impact on broader surface and ground water resources must be rigorously assessed and considered by an aquatic/freshwater specialist and/or ground water specialist, including the cumulative impact if other developments are also taking place.</p> <p>8. Rehabilitation of any disturbed ecosystem is only considered successful when the ecosystem has returned to an ecologically functional state and has similar species assemblage as its natural state. Such applications must have a complete rehabilitation plan appended to submitted documentation. It should also be noted that DAERL will not support new prospecting applications on property where previously mined or prospecting areas have been suitable rehabilitated to an ecologically functioning state and have been officially closed by the DMRE.</p> <p>COMMENT ON BASIC ASSESSMENT REPORT IN TERMS OF PROCEDURAL REQUIREMENTS OF THE EIA REGULATIONS (GNR 982)</p> <p>9. Biodiversity specialists must:</p>	<ul style="list-style-type: none"> <li>Water use requirements and potential impacts are discussed on <b>Page 24</b>. The DBAR specifies that water will be sourced sustainably and used minimally for dust suppression and drilling. Specialists will assess potential impacts on surface and groundwater, and cumulative impacts will be rigorously considered (see <b>Page 98</b>)</li> <li>The DBAR includes a comprehensive rehabilitation plan, as outlined on Pages 174-180. This plan ensures that disturbed ecosystems are restored to an ecologically functional state. The report commits to progressive rehabilitation and final closure according to DMRE standards, with specific measures detailed in the EMPR (see Page 160).</li> <li>The DBAR includes an environmental screening report in Appendix L and commits to conducting required specialist studies for high-sensitivity themes. The decision to defer</li> </ul>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>		<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<p>a. Be competent at interpreting and evaluating information and able to explain the direct and indirect consequences of an activity to biodiversity. Sub-regulation 16 (1) (b) (v) requires and environmental screening report to be generated through the web based environmental screening tool. A summary of the specialist assessments required in terms of the environmental screening tool must be provided with a copy of the screening report made available. According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. DAERL thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy’s (DMRE) written approval thereof.</p> <p>b. Have appropriate formal training in her/her field of expertise. Have sufficient practical experience working in the specific ecosystems of the affected region and thereby adding value to the planning and design of the proposed project/activity. The available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the</p>	<p>some studies is based on the minimal impact of initial non-invasive activities. Prior to any invasive activities commence, a walk-through will be conducted by specialists, to identify and designate sensitive areas as no-go zones. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations. – No prospecting activities to be done in sensitive areas. All specialists will be registered with SACNASP, ensuring compliance with professional standards (see Page 24).</p>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
		<p>Succulent Karoo Biome, to be able to make this type of broad, unqualified statement.</p> <p>c. Be able to trace impact pathways and identify indirect or cumulative impacts and consider ecosystem good and services.</p> <p>d. Have good knowledge of relating to assessment techniques and to relevant legislation, policies and guidelines.</p> <p>e. Be registered with the South African Council for Natural Scientific Professions (SACNASP)</p> <p>Please note that the DMRE no longer sends copies of the applications to commenting authorities. It is now the responsibility of the consultant working for the applicant to ensure that all commenting authorities receive the relevant documents.</p> <p>Based on the above- mentioned information it is understood that prospecting application is for non-invasive prospecting. It is understood that the entire prospecting activity on site will comprise traversing the farm on foot and collecting rock samples for analysis. It is understood that this method will have a negligible impact on biodiversity. DAERL object to the prospecting application considering that prospecting applications ultimately lead to mining applications, and considering the proposed prospecting area targets an area that has bearing on land uses and has been identified as an area for livestock farming and contain important biodiversity</p>	<p>Noted</p> <p>The DBAR reiterates that the application pertains to non-invasive prospecting activities only, designed to determine feasibility without guaranteeing mining. As noted on Page 24, invasive activities will occupy less than 0.3 hectares over the project's lifespan, with rigorous mitigation to minimize impacts.</p> <p>The DBAR was prepared with the understanding that the proposed prospecting activities are primarily non-invasive and represent an early investigative phase to assess feasibility. Mining feasibility cannot be determined until prospecting activities have been completed, as stated throughout the DBAR. Invasive activities, limited to a cumulative disturbance of less than 0.3 hectares, will only occur in the later stages of the prospecting phase and will involve minimal disturbance.</p>	

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		features such as CBA`s and water courses. Although we understand that the impacts of prospecting are usually less than that of a mining, prospecting often leads often leads to mining and we do not support mining activities in the prospecting application area, as the environmental damage to ecologically pattern and processes is often irreplaceable, as the receiving environment is unlikely to be rehabilitated to its ecological state prior to mining.	<ul style="list-style-type: none"> <li>✦ The DBAR commits to conducting specialist studies once the drilling plan is finalised, ensuring that sensitive areas are excluded from the prospecting footprint. Each drill site will occupy approximately 10m x 10m, with a maximum of four sites active at any time, resulting in a disturbance of less than 0.04 hectares at any given moment (refer to Page 24). Drill sites can also be adjusted to avoid sensitive areas, guided by walk-throughs conducted by qualified specialists.</li> <li>✦ The assertion by DAERL regarding the EAP's qualifications is unfounded, as the DBAR clearly states that all necessary specialist studies, compliant with regulations, will be conducted. The investigative nature of the prospecting right application does not guarantee mining activities, nor does it ensure a favourable feasibility outcome.</li> <li>✦ We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. DAERL will be informed of the DMRE's decision following the review period.</li> </ul>	
Department of Agriculture, Environmental Affairs Rural Development and Land Reform - Springbok	30/1/2025			Appendix E - Proof of public participation

<b>Interested and Affected Parties</b>		<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
List the name of persons consulted in this column, and  Mark with an X where those who must be consulted were in fact consulted					
<b>Traditional Leaders</b>	N/A	No community were identified within the study area.			
<b>Dept. Environmental Affairs</b>					
Department of Agriculture Environmental Affairs and Rural Development and Land Reform	X	9/12/2024	Your notices regarding the PR applications refers. You are hereby requested to consult as follows: 1. Where the land is a CPA ensure that section of the CPA amendment act is complied with. 2. Where the land is still reflecting community name, refer to section 3 (13) of the TRANCRAA legislation regarding the correct owner of the land been the department Agriculture, Land Reform and Rural Development and not Namakhoi local municipality. 3. For further advice please contact the writer hereof	Thank you for your email and for participating in the public consultation process for the Draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPR).  We acknowledge your request for consultation regarding the PR applications and appreciate the issues you've highlighted.  Compliance with the CPA Amendment Act: We will ensure that all requirements under the Communal Property Associations Amendment Act, 2018 (Act No. 20 of 2018) are adhered to, particularly regarding land held under a CPA.  Ownership of Land Under TRANCRAA: Your reference to Section 3(13) of the Transformation of Certain Rural Areas Act (Act No. 94 of 1998) is noted. We will confirm ownership details and ensure that the Department of Agriculture, Land Reform, and Rural Development (DALRRD) is consulted where necessary, especially in cases where the land is still reflecting a community name.  Should you require additional details or wish to discuss this further, please do not hesitate to contact us	Appendix E - Proof of public participation
<b>Other Competent Authorities affected</b>					
Department of Labour – Northern cape Provincial	X	No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.			



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Mark with an X where those who must be consulted were in fact consulted					
Department of Water and Sanitation	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
South African Heritage Resources Agency	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
Department of Economic Development and Tourism; Kimberley	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
Department of Economic Development and Tourism; Upington	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
Regional Land Claims Commission Northern Cape	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
National Protected Area Expansion Strategy – Northern Cape	X		No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.		
WWF South Africa	X	29/1/2025	<ol style="list-style-type: none"> <li>WWF South Africa (WWF-SA) hereby wish to confirm its registration as an Interested and Affected Party (I&amp;AP) in accordance with the Environmental Impact Assessment (EIA) Regulations<sup>1</sup> of the National Environment Management Act No. 107 of 1998 (NEMA) for the above-mentioned prospecting application for environmental authorization.</li> <li>Please be advised that WWF-SA is the registered owner of Portion 1 of the Farm Ratel Kraal 131 located adjacent to the proposed prospecting area as indicated</li> <li>WWF-SA acquired several properties declared and managed as part of the Goegap Nature Reserve specifically for</li> </ol>	<p>We acknowledge receipt of your correspondence dated 29 January 2025, containing comments regarding the Draft Basic Assessment Report (BAR) for the proposed prospecting project. We greatly appreciate your participation in the Public Participation Process (PPP) and your detailed feedback.</p> <p>Below, we address each point raised.</p> <p>1 -2. Registration as an I&amp;AP and Lodging of Objection</p> <p>WWF-SA wishes to confirm its registration as an Interested and Affected Party (I&amp;AP) in</p>	Appendix E - Proof of public participation

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		<p>their ecological importance on request from the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL) to achieve national and international conservation targets in accordance with the objectives of the National Environmental Management: Protected Areas Act No. 57 of 2003 (NEM:PAA), as amended.</p> <p>4. WWF-SA therefore has a clear interest in protecting sensitive ecosystems and threatened ecological areas on property it owns and adjacent properties from prospecting activities, as well as anticipated future impacts should the prospecting right be converted to a mining right.</p> <p><b>BIODIVERSITY VALUE OF PROPOSED PROSPECTING AREA</b></p> <p>5.The following environmental features are applicable to the proposed prospecting area as illustrated on the maps included in Annexure A:</p> <p>a.Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) in terms of the 2016 Northern Cape Critical Biodiversity Area Map</p> <p>b.National Freshwater Ecosystem Priority Area (NFEPA) rivers</p> <p>c.National Protected Areas Expansion Strategy Priority Areas (NPAES of 2016)</p>	<p>accordance with the Environmental Impact Assessment (EIA) Regulations of NEMA and lodges an objection to the application.</p> <ul style="list-style-type: none"> <li>■ The registration of WWF-SA as an I&amp;AP is acknowledged. All comments and objections will be considered and incorporated into the Final Basic Assessment Report (FBAR).</li> </ul> <p>3 - 4. Ownership and Conservation Intentions</p> <p>WWF-SA is the registered owner of Portion 1 of the Farm Ratel Kraal 131, located adjacent to the proposed prospecting area and has acquired land to achieve conservation targets under the National Environmental Management: Protected Areas Act, 2003 (NEM:PAA).</p> <p>WWF-SA acquired several properties declared and managed as part of the Goegap Nature Reserve specifically for their ecological importance on request from the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL) to achieve national and international conservation targets in accordance with the objectives of the National Environmental Management: Protected Areas Act No. 57 of 2003 (NEM:PAA), as amended.</p> <p>WWF-SA therefore has a clear interest in protecting sensitive ecosystems and threatened</p>	

<b>Interested and Affected Parties</b>  <b>List the name of persons consulted in this column, and</b>  <b>Mark with an X where those who must be consulted were in fact consulted</b>	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
		<p>6. Approximately 75% (52 297 ha) of the proposed prospecting area falls within the Priority Focus Area of the NPAES. These areas are considered irreplaceable sites for biodiversity conservation to meet conservation targets, and global or national biodiversity commitments.</p> <p>7. In addition, approximately 72% of the proposed prospecting area is categorised as irreplaceable CBAs and 18% as highly important ESAs. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBAs considered as “no-go” areas for any development.</p> <p>8. The proposed application is made in respect of an area that constitutes important habitat for several species of conservation concern as highlighted in the environmental screening report (Appendix L of the BAR). According to SANBI’s red data list, two Endangered (EN), eight Vulnerable (VU), six Rare and 27 Unnamed sensitive species potentially occur within the proposed prospecting area.</p> <p>Taking the above information into consideration, the irreplaceability and critical importance of the ecosystem found in this area in terms of South African law and biodiversity planning instruments (e.g. provincial and national protected area expansion strategies) is evident. For</p>	<p>ecological areas on property it owns and adjacent properties from prospecting activities, as well as anticipated future impacts should the prospecting right be converted to a mining right.</p> <ul style="list-style-type: none"> <li>■ While WWF-SA’s conservation initiatives and ownership of Portion 1 of Farm Ratel Kraal 131 are acknowledged, it is important to note that the proposed prospecting activities are not within the Goegap Nature Reserve and will not impact formally declared protected areas. Additionally, prospecting does not equate to mining, and the precautionary principle applies in allowing a phased approach to environmental assessments.</li> <li>■ Greenmined acknowledges that portions of the prospecting area overlap with CBAs and NPAES Priority Focus Areas. However, as outlined on page 86 of the DBAR, the prospecting activities will avoid sensitive ecological features. Each drill site will be limited to a 10m x 10m footprint, and no more than four sites (0.04 hectares combined) will be active at any time. Additionally, specialists will conduct pre-activity walk-throughs to ensure sensitive areas are identified and avoided.</li> <li>■ It is important to emphasize that this application is for prospecting, not mining. Should future activities necessitate further environmental assessments,</li> </ul>	

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		<p>this reason, WWF-SA is of the view that, although prospecting may have relatively limited impacts on the affected area, it is certain that conversion of these rights to mining would have unacceptable consequences for biodiversity, ecological infrastructure and associated ecosystem services.</p> <p>COMMENT ON BASIC ASSESSMENT REPORT IN TERMS OF PROCEDURAL REQUIREMENTS OF THE EIA REGULATIONS (GNR 982)</p> <p>10. In terms of sub-regulation 16(1)(b)(iii) and (iv) of the EIA Regulations (GNR 982), the Environmental Assessment Practitioner (EAP) is required to include in the application a signed declaration stating their independence and competence, as well as an undertaking under oath that the information presented is true and correct. Upon careful review of the Basic Assessment Report (BAR), these documents were found to be absent, and a copy is respectfully requested.</p> <p>11. Sub-regulation 16(1)(b)(v) requires an environmental screening report to be generated through the national web based environmental screening tool. This report forms the basis of the environmental impact assessment process and is thus of critical importance</p>	<p>these will be undertaken in accordance with legal requirements.</p> <p>5 - 9. Biodiversity Value of Proposed Prospecting Area</p> <p>The site includes Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), and National Freshwater Ecosystem Priority Areas (NFEPA), making it irreplaceable for biodiversity conservation.</p> <p>Taking the above information into consideration, the irreplaceability and critical importance of the ecosystem found in this area in terms of South African law and biodiversity planning instruments (e.g. provincial and national protected area expansion strategies) is evident. For this reason, WWF-SA is of the view that, although prospecting may have relatively limited impacts on the affected area, it is certain that conversion of these rights to mining would have unacceptable consequences for biodiversity, ecological infrastructure and associated ecosystem services.</p> <ul style="list-style-type: none"> <li>■ The DBAR acknowledges the ecological sensitivity of the area and outlines mitigation measures to minimize impacts. It should also be noted that the prospecting activities will be non-invasive for the initial phases, with invasive drilling limited to small areas. The site sensitivity verification report confirms that drilling</li> </ul>	

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		<p>in our consideration of the content of the BAR and proposed prospecting area. A summary of the specialist assessments required in terms of the environmental screening report is provided in Table 30 of the BAR with a copy of the screening report made available in Appendix L (also see Table 3 below). According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. This reasoning does not align with the requirements of the relevant protocol as discussed in Point 12 below.</p> <p>In addition, the available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement. WWF-SA thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the</p>	<p>locations will avoid high-sensitivity areas and that they will be regarded as no go areas.</p> <ul style="list-style-type: none"> <li>■ The DBAR provides a reasoned justification for the exclusion of specialist studies. As stated on page 47, the limited scale and temporary nature of the proposed activities do not warrant extensive specialist studies. The Environmental Assessment Practitioner (EAP) has outlined a mitigation hierarchy to address potential impacts. Site sensitivity verification will be conducted prior to invasive activities, as stipulated in the DBAR.</li> <li>■ Additionally, the DBAR complies with the National Environmental Management Act’s requirements for prospecting applications. Should the prospecting phase yield results warranting mining, a new application with appropriate specialist studies will be submitted.</li> </ul> <p>10 - 12. Compliance with EIA Regulations (GNR 982)</p> <p>The DBAR lacks an EAP declaration of independence, a site sensitivity verification report, and compliance statements from specialists.</p> <p>Sub-regulation 16(1)(b)(v) requires an environmental screening report to be generated through the national web based environmental</p>	

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
			<p>Department of Minerals and Energy's (DMRE) written approval thereof.</p> <p>According to sub-regulation 16(3)(a), "any report, plan or document submitted as part of an application must comply with any protocol or minimum information requirements related to the application as identified and gazetted by the Minister in a government notice." Upon review of the BAR, it was determined that the report fails to consider and apply the requirements of the prescribed protocols for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020) as required in terms of sections 24(5)(a), (h) and 44 of NEMA.</p> <p>More specifically, the protocol requires that a site sensitivity verification report must be compiled through "(a) a desk top analysis, using satellite imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information" to confirm or dispute the current land use and/or environmental sensitive features identified in the environmental screening report to confirm if the identified specialist assessments are required. The protocols further require that should the site verification assessment determine that a designation of "very high" sensitivity should in fact be of "low" sensitivity, a compliance statement must be prepared</p>	<p>screening tool. This report forms the basis of the environmental impact assessment process and is thus of critical importance in our consideration of the content of the BAR and proposed prospecting area.</p> <p>A summary of the specialist assessments required in terms of the environmental screening report is provided in Table 30 of the BAR with a copy of the screening report made available in Appendix L (also see Table 3 below). According to the content of Table 30, specialist studies were not conducted "due to the minimal and temporary nature of the proposed prospecting activities" despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. This reasoning does not align with the requirements of the relevant protocol as discussed in Point 12 below.</p> <p>In addition, the available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement. WWF-SA thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy's (DMRE) written approval thereof.</p>	

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		<p>by a specialist registered with SACNASP in the relevant field for submission as part of the application process. However, the BAR does not:</p> <ul style="list-style-type: none"> <li>a.include a copy of the site sensitivity verification report;</li> <li>b.provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments;</li> <li>c.provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or</li> <li>d.provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist.</li> </ul> <p>Considering the above, we respectfully request copies of:</p> <ul style="list-style-type: none"> <li>1.site sensitivity verification report;</li> <li>2.compliance statements from suitable qualified specialists for all themes designated very high sensitivity; and</li> <li>3.written confirmation from DMRE regarding the acceptance of the site sensitivity report and compliance statements to provide informed feedback on the application.</li> </ul> <p>As it stands, the BAR appears to be fatally flawed through the lack of evidence that confirms compliance with these requirements.</p>	<p>According to sub-regulation 16(3)(a), “any report, plan or document submitted as part of an application must comply with any protocol or minimum information requirements related to the application as identified and gazetted by the Minister in a government notice.” Upon review of the BAR, it was determined that the report fails to consider and apply the requirements of the prescribed protocols for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020) as required in terms of sections 24(5)(a), (h) and 44 of NEMA. include a copy of the site sensitivity verification report;</p> <p>provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments;</p> <p>provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or</p> <p>provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist.</p> <p>More specifically, the protocol requires that a site sensitivity verification report must be compiled through “(a) a desk top analysis, using satellite</p>	

<b>Interested and Affected Parties</b> <b>List the name of persons consulted in this column, and</b> <b>Mark with an X where those who must be consulted were in fact consulted</b>	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
		<p>13.Appendix 1: Paragraph 3(1)(e) of the EIA Regulations (hereafter referred to as Appendix 1) further requires a description of the policy and legislative context within which the application is proposed to be included in the BAR. However, Table 4 of the BAR fails to consider the following legislation, protocols and strategies applicable to the proposed mining activities and is thus non-compliant with the requirements of section 3(e) of Appendix 1:</p> <p>a.Northern Cape Planning and Development Act No 7 of 1998  b.Northern Cape Nature Conservation Act No 9 of 2009  c.The prescribed protocols in terms of the EIA Regulations for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020)</p> <p>14.Further to the above, even though the BAR refers to the Nama Khoi Municipality's Integrated Development Plan, it does not describe the zoning of the property and instead goes into detail about the Gamsberg zinc mine located in the Khai-Ma municipal area. It is unclear how this information is relevant to the prospecting application. It is requested that the EAP confirm the municipal zoning of the property and compliance with the relevant zoning bylaws of the Nama Khoi</p>	<p>imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information" to confirm or dispute the current land use and/or environmental sensitive features identified in the environmental screening report to confirm if the identified specialist assessments are required. The protocols further require that should the site verification assessment determine that a designation of "very high" sensitivity should in fact be of "low" sensitivity, a compliance statement must be prepared by a specialist registered with SACNASP in the relevant field for submission as part of the application process. However, the BAR does not:</p> <p>a. include a copy of the site sensitivity verification report;</p> <p>b. provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments;</p> <p>c. provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or</p> <p>d. provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist.</p>	



Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		<p>municipality (and not the Khai-Ma municipality).</p> <p>15.Paragraph 3(1)(f) of Appendix 1 requires the inclusion of a motivation for the need and desirability of the proposed application in the context of the preferred location. However, the relevant motivation in the BAR fails to consider the sensitivity of the site as highlighted in terms of the NPAES, 2016 Northern Cape CBA map and environmental screening report results (considering there are no specialist assessments, site verification report or compliance statements) and subsequently does not explain how the proposed prospecting application and potential future mining activities prevails over national and international biodiversity commitments, as well as requirements of national legislation in terms of the:</p> <p>a.Montreal Global Biodiversity Framework;  b.Convention on Biological Diversity;  c.National Environmental Management: Biodiversity Act No 10 of 2004 (NEM:BA);  and  d.NEM:PAA</p> <p>16.Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR. Due to the following omissions, we are</p>	<p>Considering the above, we respectfully request copies of:</p> <ol style="list-style-type: none"> <li>1.site sensitivity verification report;</li> <li>2.compliance statements from suitable qualified specialists for all themes designated very high sensitivity; and</li> <li>3.written confirmation from DMRE regarding the acceptance of the site sensitivity report and compliance statements to provide informed feedback on the application.</li> </ol> <p>As it stands, the BAR appears to be fatally flawed through the lack of evidence that confirms compliance with these requirements.</p> <ul style="list-style-type: none"> <li>■ The declaration of independence will be included in the FBAR (Appendix H). The site sensitivity verification was conducted in accordance with the relevant protocols, and additional specialist inputs will be obtained if deemed necessary during the prospecting phase. The DMRE will review the sensitivity verification report before granting authorization.</li> </ul> <p>13. Omission of Key Legislative References</p> <p>The DBAR fails to reference the Northern Cape Nature Conservation Act, 2009, the Northern Cape</p>	

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		<p>concerned that the impact assessment included in the BAR cannot meet this requirement:</p> <p>a. Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12).</p> <p>b. Compliance statements from suitably qualified specialists to confirm the reduced sensitivity ratings from “very high” to “low” for the relevant environmental themes indicated in Table 4.</p> <p><b>OTHER CONSIDERATIONS</b></p> <p>17.The property description provided in the BAR and DMRE acceptance letter (Appendix H of the BAR) indicates the proposed prospecting area to be located on Farm 622. However, according to Windeed (Annexure B), the correct property description is Portion 25 of the Farm Steinkopf No 22. We would therefore appreciate clarification of this discrepancy.</p> <p>18.It needs to be pointed out that the important biodiversity areas indicated in the Mining and Biodiversity Map referred to on pages 69 and 83 of the BAR was published in 2012 and is therefore outdated. The 2016 NC CBA Map provides a more accurate reflection of the</p>	<p>Planning and Development Act, 1998, and the prescribed assessment protocols under Government Gazette No. 320 of 2020.</p> <p>Appendix 1: Paragraph 3(1)(e) of the EIA Regulations (hereafter referred to as Appendix 1) further requires a description of the policy and legislative context within which the application is proposed to be included in the BAR. However, Table 4 of the BAR fails to consider the following legislation, protocols and strategies applicable to the proposed mining activities and is thus non-compliant with the requirements of section 3(e) of Appendix 1: Northern Cape Planning and Development Act No 7 of 1998</p> <p>Northern Cape Nature Conservation Act No 9 of 2009</p> <p>The prescribed protocols in terms of the EIA Regulations for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020)</p> <ul style="list-style-type: none"> <li>■ The legislative framework provided in the DBAR aligns with NEMA and MPRDA requirements. However, the additional references will be included in the FBAR to ensure completeness.</li> </ul> <p>14. Zoning and Municipal Compliance</p>	

<b>Interested and Affected Parties</b>  <b>List the name of persons consulted in this column, and</b>  <b>Mark with an X where those who must be consulted were in fact consulted</b>	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
		<p>distribution of CBAs and ESAs for consideration in the BAR.</p> <p>19.It is incorrectly stated on pages 8 and 87 of the BAR that the screening tool designated the site to be of “medium” sensitivity in terms of the animal species theme. The correct designation is “high” due to the potential occurrence of several species of conservation concern (see Table 2).</p> <p>20.The BAR mentions on several occasions that specialists will be involved during later phases to micro-site drilling and borehole sites to avoid sensitive environmental features. This step is however not included in the schedule provided on page 32 of the BAR. Please clarify the reason for this omission.</p> <p>21.On pages 52 and 53 of the BAR it is stated that the 30 day comment period will be ending on 30 January 2025. However, on page 6 it is indicated as ending on 31 January 2025.</p> <p>22.Page 77 of the BAR refers to the Namaqualand biome. This is incorrect as the property falls within the Succulent Karoo Biome.</p> <p>23.Annexure I includes information related to a prospecting application in the Western Cape Province and the CV of Ms Zoë Norval. Please clarify the applicability to these documents in terms of the Concordia prospecting application.</p>	<p>Further to the above, even though the BAR refers to the Nama Khoi Municipality's Integrated Development Plan, it does not describe the zoning of the property and instead goes into detail about the Gamsberg zinc mine located in the Khai-Ma municipal area. It is unclear how this information is relevant to the prospecting application. It is requested that the EAP confirm the municipal zoning of the property and compliance with the relevant zoning bylaws of the Nama Khoi municipality (and not the Khai-Ma municipality).</p> <p>The FBAR will include confirmation of the zoning of the property within the Nama Khoi Municipality. Preliminary investigations indicate that the proposed activities align with existing land-use frameworks. This will be further detailed in the updated report.</p> <p>15. Need and Desirability Justification</p> <p>Paragraph 3(1)(f) of Appendix 1 requires the inclusion of a motivation for the need and desirability of the proposed application in the context of the preferred location. However, the relevant motivation in the BAR fails to consider the sensitivity of the site as highlighted in terms of the NPAES, 2016 Northern Cape CBA map and environmental screening report results (considering there are no specialist assessments, site verification report or compliance statements) and subsequently does not explain how the</p>	

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
		<p>CONCLUSION 24. WWF-SA is not against development as long as it is planned and implemented in a sustainable manner that complies with South Africa's legislative framework. We are however concerned that the EIA process implemented for the proposed prospecting area does not comply with the requirements of the EIA regulations and ignores legislated requirements in terms of the minimum criteria for reporting on environmental themes. This landscape is highly sensitive in terms of its biodiversity and is known to respond very slowly to rehabilitation efforts due to its arid nature. 25. For this reason, it is our opinion that the prospecting application DMRE REF: NC 30/5/1/1/2/14025 PR in its current form does not comply with the EIA Regulations and we object in the strongest possible way to its approval. Furthermore, WWF-SA reserves the right to provide further comment in terms of Chapter 6 of the EIA Regulations, should the application be revised to address these omissions.</p>	<p>proposed prospecting application and potential future mining activities prevails over national and international biodiversity commitments, as well as requirements of national legislation in terms of the: Montreal Global Biodiversity Framework; Convention on Biological Diversity; National Environmental Management: Biodiversity Act No 10 of 2004 (NEM:BA); and NEM:PAA.</p> <ul style="list-style-type: none"> <li>■ The prospecting application aligns with national policies on responsible mineral resource utilisation. The impact is temporary and will be mitigated through rehabilitation measures. The DBAR will expand on sustainable development principles in the need and desirability section.</li> </ul> <p>16. Impact Assessments and Mitigation Measures</p> <p>The impact assessment lacks verification of reduced sensitivity ratings and does not demonstrate avoidance of significant environmental risks.</p> <p>Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR. Due to the following omissions, we are concerned that the impact assessment included in the BAR cannot</p>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<p>meet this requirement: Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12).</p> <p>Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR. Due to the following omissions, we are concerned that the impact assessment included in the BAR cannot meet this requirement: Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12).</p> <p>Compliance statements from suitably qualified specialists to confirm the reduced sensitivity ratings from "very high" to "low" for the relevant environmental themes indicated in Table 4.</p> <ul style="list-style-type: none"> <li>■ The DBAR follows prescribed methodologies for assessing impact significance. If DMRE requires further assessments, these will be undertaken as part of the authorisation process.</li> </ul> <p>17. Property Description Discrepancies</p> <p>The property description in the DBAR and DMRE acceptance letter refers to "Farm 622," whereas Windeed lists it as "Portion 25 of Farm Steinkopf No. 22."</p>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<ul style="list-style-type: none"> <li> <p> <span style="color: green;">▶</span> The property description will be clarified with the DMRE and corrected in the FBAR if necessary.</p> <p>18. Use of Outdated Data Sources</p> <p>The DBAR references a 2012 Mining and Biodiversity Map instead of the 2016 Northern Cape CBA Map.</p> </li> <li> <p> <span style="color: green;">▶</span> The DBAR includes both sources. The please refer to page 102 for the 2016 map in the FBAR.</p> </li> </ul> <p>19. Animal Species Sensitivity Rating</p> <p>The DBAR incorrectly states that the screening tool designates the site as "medium" sensitivity for animal species when it is actually "high."</p> <ul style="list-style-type: none"> <li> <p> <span style="color: green;">▶</span> Greenmined Environmental has reviewed this comment and agrees that the sensitivity of the animal species theme should be corrected. This amendment will be made in the FBAR. However, as outlined on page 87 of the DBAR, all drilling activities will be planned to avoid sensitive habitats, and mitigation measures will be implemented to minimize potential impacts.</p> </li> </ul> <p>20. Future Specialist Involvement</p> <p>The BAR mentions on several occasions that specialists will be involved during later phases to</p>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<p>micro-site drilling and borehole sites to avoid sensitive environmental features. This step is however not included in the schedule provided on page 32 of the BAR. Please clarify the reason for this omission.</p> <ul style="list-style-type: none"> <li> <span style="color: green;">▶</span> Micro-siting procedures are outlined in the DBAR's mitigation measures (page 86). Prior to any drilling, specialists will conduct walk-throughs to ensure sensitive areas are avoided. The schedule in the FBAR will be updated to explicitly reflect this process.                     </li> </ul> <p>The schedule will be updated to reflect this commitment.</p> <p>21. Public Participation Period Discrepancy</p> <p>On pages 52 and 53 of the BAR it is stated that the 30 day comment period will be ending on 30 January 2025. However, on page 6 it is indicated as ending on 31 January 2025.</p> <ul style="list-style-type: none"> <li> <span style="color: green;">▶</span> This will be corrected to the official closing date in the Final Basic Assessment Report (FBAR). However, comments received on the 31st of January 2025 will still be accepted.                     </li> </ul> <p>22. Incorrect Biome Classification</p>	

<b>Interested and Affected Parties</b> List the name of persons consulted in this column, and  Mark with an X where those who must be consulted were in fact consulted	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
			<p>Page 77 of the BAR refers to the Namaqualand biome. This is incorrect as the property falls within the Succulent Karoo Biome.</p> <ul style="list-style-type: none"> <li>■ This will be updated in the FBAR.</li> </ul> <p>23. Irrelevant Annexures</p> <p>Annexure I includes details of a Western Cape prospecting application and the CV of Ms. Zoë Norval, which do not pertain to this application.</p> <ul style="list-style-type: none"> <li>■ The relevant sections of Annexure I will be revised to remove unrelated information.</li> <li>■ This error occurred during document compilation. The FBAR will exclude irrelevant references and ensure all appended documents pertain specifically to the Concordia prospecting application.</li> </ul> <p>24 – 25. Conclusion</p> <p>WWF-SA is not against development as long as it is planned and implemented in a sustainable manner that complies with South Africa's legislative framework. We are however concerned that the EIA process implemented for the proposed prospecting area does not comply with the requirements of the EIA regulations and ignores legislated requirements in terms of the minimum criteria for reporting on environmental themes.</p>	



<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<p>This landscape is highly sensitive in terms of its biodiversity and is known to respond very slowly to rehabilitation efforts due to its arid nature.</p> <p>For this reason, it is our opinion that the prospecting application DMRE REF: NC 30/5/1/1/2/14025 PR in its current form does not comply with the EIA Regulations and we object in the strongest possible way to its approval. Furthermore, WWF-SA reserves the right to provide further comment in terms of Chapter 6 of the EIA Regulations, should the application be revised to address these omissions.</p> <ul style="list-style-type: none"> <li>■ While WWF-SA's concerns are noted, the DBAR follows legal requirements, and mitigation measures will be enhanced where necessary in the FBAR. The prospecting application remains compliant with NEMA and MPRDA regulations.</li> <li>■ It is important to reiterate to WWF-SA that the DBAR was written with the proposed prospecting activities in mind and that it was clearly stated throughout the document that non-invasive activities form a major part of the feasibility study. Being in such early stages of the project, the feasibility of mining activities cannot be determined at this stage prior to prospecting activities being conducted. Furthermore, it was also clearly stated that any invasive activities will only occur towards the end of the prospecting phase and will involve minimal disturbance. This minimal</li> </ul>	

<p><b>Interested and Affected Parties</b></p> <p>List the name of persons consulted in this column, and</p> <p>Mark with an X where those who must be consulted were in fact consulted</p>	<p><b>Date Comments Received</b></p>	<p><b>Issues raised</b></p>	<p><b>EAPs response to issues as mandated by the applicant</b></p>	<p><b>Section and paragraph reference in this report where the issues and or response were incorporated.</b></p>
			<p>impact, combined with the planned mitigation measures, is the reason the EAP concluded that the environmental impact would be low.</p> <ul style="list-style-type: none"> <li>■ The DBAR also commits to conducting specialist studies once the drilling plan is finalized, ensuring sensitive areas are excluded from the prospecting footprint. Each drill site will involve Reverse Circulation (RC) and Diamond (Core) drilling methods, occupying an area of approximately 10m x 10m. A maximum of four sites will be active at any given time, resulting in a total disturbance of less than 0.04 hectares at any one time. Over the life of the prospecting right, between 10 and 30 boreholes will be drilled, with a cumulative disturbance of less than 0.3 hectares.</li> <li>■ Given the minimal disturbance, drill sites can be adjusted to avoid potential impacts on sensitive areas. Before any invasive activities commence, a walk-through will be conducted by specialists, to identify and designate sensitive areas as no-go zones. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations.</li> <li>■ The statement by WWF-SA that the BAR appears to be fatally flawed due to a lack of evidence confirming compliance with these requirements is therefore unfounded, as it was clearly stated that these studies, complying</li> </ul>	

<b>Interested and Affected Parties</b> List the name of persons consulted in this column, and  Mark with an X where those who must be consulted were in fact consulted	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
			<p>with all regulations, will be conducted to exclude sensitive areas. Regarding WWF-SA's position that development should be planned and implemented sustainably and in compliance with South Africa's legislative framework, it is critical to note that the application for a prospecting right is an investigative phase. It does not guarantee that mining activities will follow, nor does it imply any assurance of a positive outcome for mining feasibility. Greenmined Environmental remains committed to ensuring full compliance with regulatory requirements and sustainable environmental practices throughout the prospecting phase.</p> <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. WWF will be informed of the DMRE's decision following the review period.</p> <p>Greenmined Environmental (Pty) Ltd remains committed to ensuring a thorough, transparent, and legally sound process. Further comments are welcomed before final submission to DMRE.</p>	
<b>OTHER AFFECTED PARTIES</b>				

Interested and Affected Parties List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
INTRIM COMMITTEE OF KOMAGGAS BUFFELSRIVIER	X	27/01/2025	<p>I am Janice Magerman, secretary of the Intrim Committee of Komaggas Buffelsrivier Plaas 200.</p> <p>We as Committee was instructed by Mnr Mashune to explain your assesment to our communities, but we would not be able to as we do not have the intel do so.</p> <p>Therefore, we would like to schedule a meeting regarding this matter as soon as possible, to resolve this matter.</p> <p>Please do not hesitate to contact us.</p>	<p>Thank you for taking part in the public participation process and for reaching out regarding the Basic Assessment Report.</p> <p>We understand the importance of providing clear information to assist you in liaising with the communities of Komaggas Buffelsrivier Plaas 200. To address your concerns and ensure you have the necessary details, we propose a Microsoft Teams meeting this week at a time that is convenient for you.</p> <p>As per the public participation process, please note that the closing date for comments, as advertised, is 30 January 2025 at 17:00. The 30-day commenting period commenced on 6 December 2024.</p> <p>Kindly let us know your availability for the meeting so we can finalize a date and time that suits you.</p> <p>We look forward to assisting you further.</p>	Appendix E - Proof of public participation
		29/1/2025	<p>This email serves to inform you that although we are very enlightens that you replied to our previous mails, the members are very busy this week and would be unable to accommodate you on the Teams meeting prior to your date.</p>	<p>Thank you for your response and for keeping us informed. We understand that scheduling a meeting this week may be challenging due to members' availability and connectivity issues.</p> <p>As a reminder, the public commenting period for the Draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPR) was from 6 December 2024 until 30 January 2025.</p>	

<b>Interested and Affected Parties</b> List the name of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted	<b>Date  Comments  Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
		<p>Furthermore, we struggle with signal issues on our end and members are on different locations at the moment.</p> <p>If I may, will we be able to make another appointment.</p>	<p>Given the circumstances, we propose including in our Final Basic Assessment Report to the Department of Mineral Resources and Energy (DMRE) that prior to any prospecting activities, a meeting should be held between the applicant and community members to address any concerns they may have. Would this be in order with you?</p> <p>As outlined in the DBAR, the initial prospecting activities consist mainly of non-invasive studies before any intrusive work begins. This means there will still be an opportunity for further discussions before any significant physical activities take place.</p> <p>Please let us know your thoughts on this approach. We remain available to engage further at a time that suits you.</p>	
	29/1/2025	<p>Firstly, we would like to thank you for understanding our dilemma at this point in time. The fact of further communication is welcomed, and we would surely take that opportunity.</p> <p>As for community participation we will offer our support in that matter.</p> <p>Hope you will contact us in due time as to your process flows.</p>	<p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. WWF will be informed of the DMRE's decision following the review period.</p> <p>We will forward your details to the applicant who will liaise further with you as well.</p>	
<b>INTERESTED PARTIES</b>				

<b>Interested and Affected Parties</b>  List the name of persons consulted in this column, and  Mark with an X where those who must be consulted were in fact consulted	<b>Date Comments Received</b>	<b>Issues raised</b>	<b>EAPs response to issues as mandated by the applicant</b>	<b>Section and paragraph reference in this report where the issues and or response were incorporated.</b>
N/A	No comments or concerns were received on the draft Basic Assessment Report (BAR) to be incorporated into the final BAR.			

**iv) The Environmental attributes associated with the alternatives.**

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

**(1) Baseline Environment**

**(a) Type of environment affected by the proposed activity.**

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

This section describes the biophysical, cultural and socio-economic environment that may be affected and the baseline conditions, which are likely to be affected by the proposed prospecting activity.

**PHYSICAL ENVIRONMENT**

**CLIMATE**

According to the meteoblue website, Springbok area normally receives about 20 mm of rain per year, with most rainfall occurring mainly during winter. The chart below shows the average rainfall values for the area per month. It receives the lowest rainfall in October / December and the highest in February / June. The monthly distribution of average daily maximum temperatures shows that the average midday temperatures for the area range from 18°C in July to 30°C in January. The region is the coldest during July when the mercury drops to 3°C on average during the night. Consult the chart below for an indication of the monthly variation of average minimum daily temperatures.

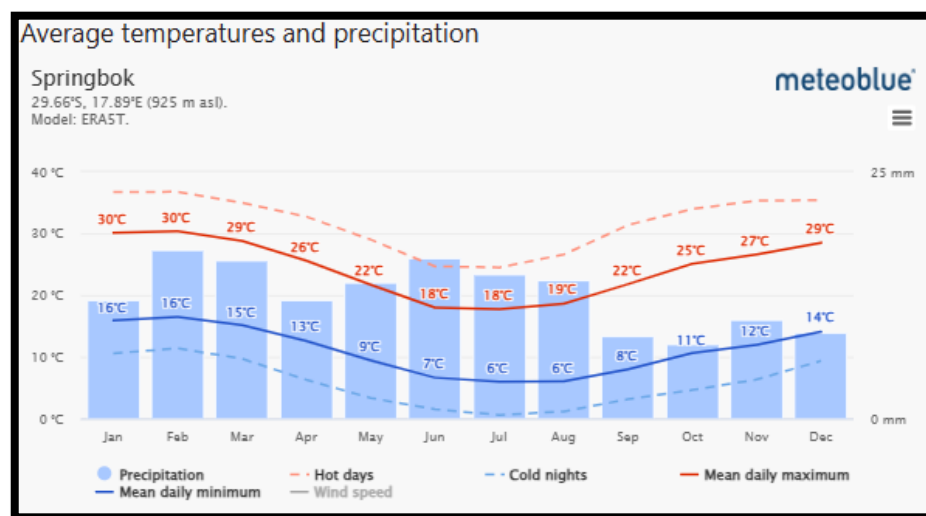


Figure 3: Statistical representation of the average rainfall, maximum temperatures, and wind speed for the region (Chart obtained from meteoblue).

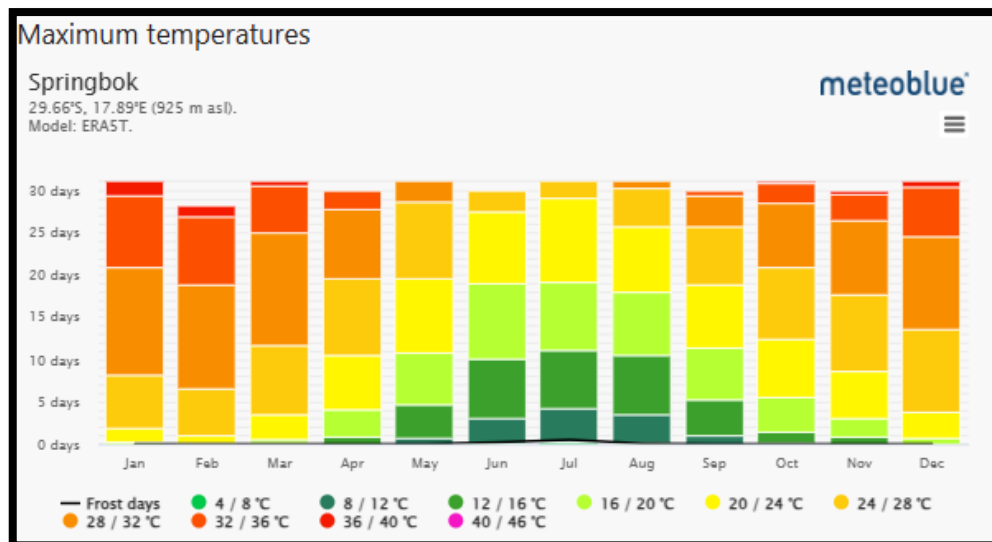


Figure 4: Statistical representation of the average rainfall, maximum temperatures, and wind speed for the region (Chart obtained from meteoblue).

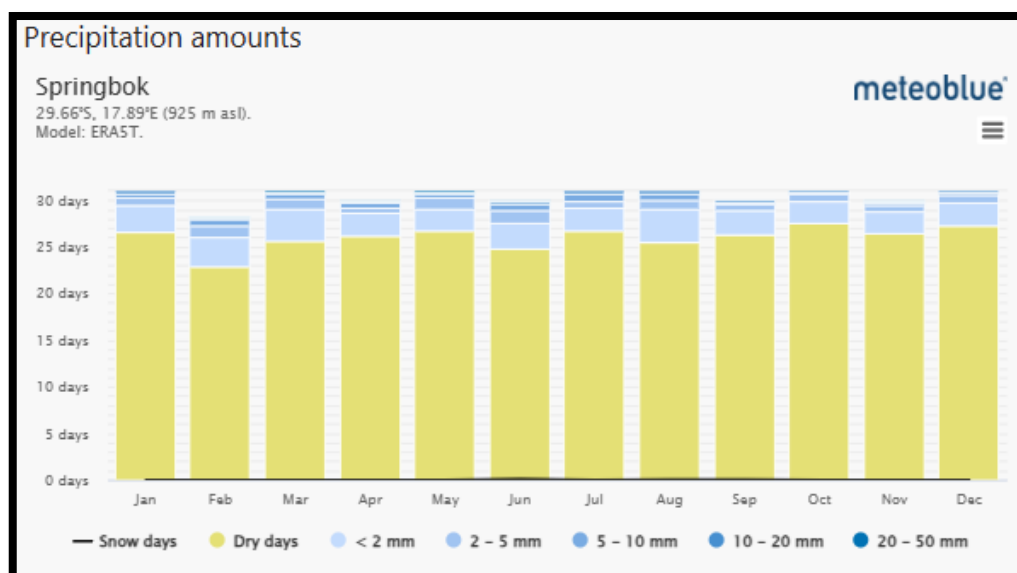


Figure 5: Statistical representation of the average rainfall, maximum temperatures, and wind speed for the region (Chart obtained from meteoblue).



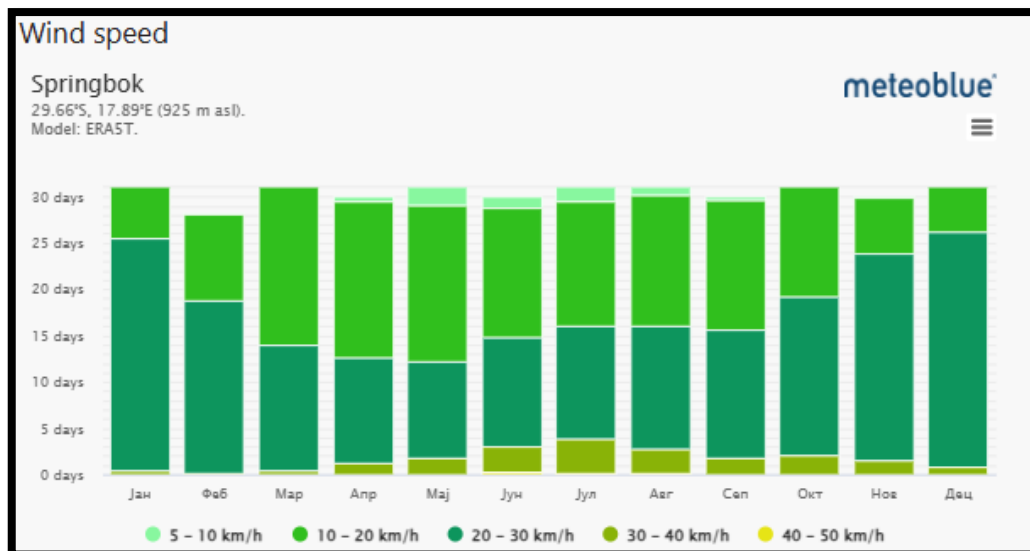


Figure 6: Statistical representation of the average rainfall, maximum temperatures, and wind speed for the region (Chart obtained from meteoblue).

The dominant wind direction of Springbok is constant ranging from west-south westerly to an east-north easterly direction. The figure below presents the wind direction distribution in % for the greater Springbok area.

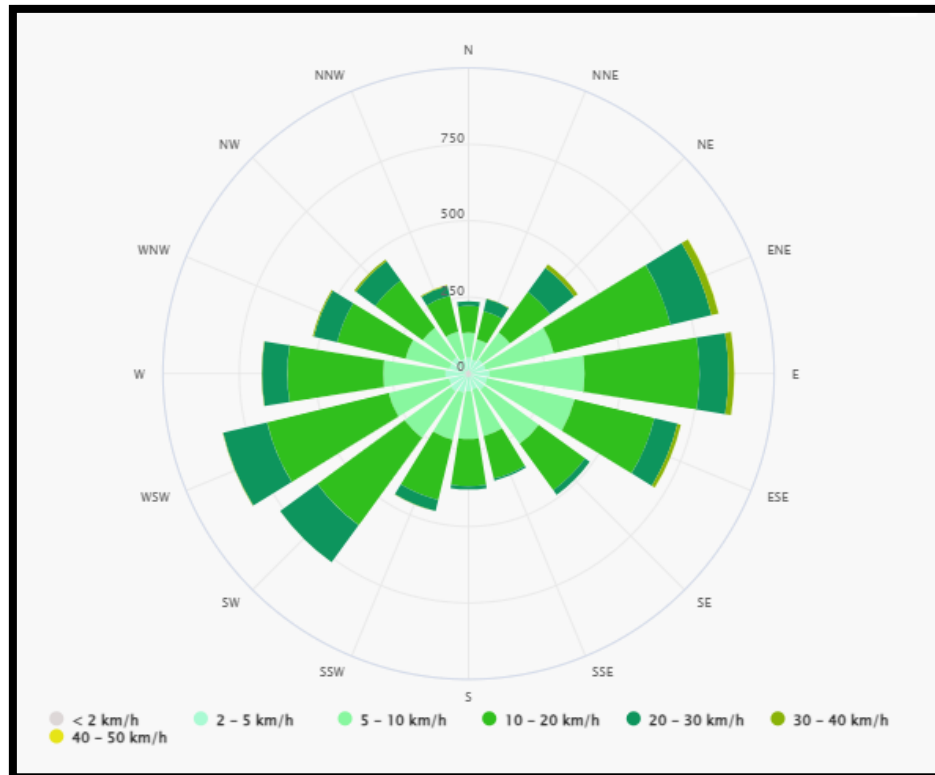


Figure 7: Annual wind direction distribution in % for the Springbok area, (Image obtained from www.meteoblue.com )

### TOPOGRAPHY

The topography of the study area consists of level to slightly undulating sedimentary surfaces between rocky granitic hills and mountains, such as wide plains and broad valleys with dry channels of intermittent water courses. The elevation loss from the north-east corner to the south-west corner of the proposed footprint is 1111 m over 55 km.

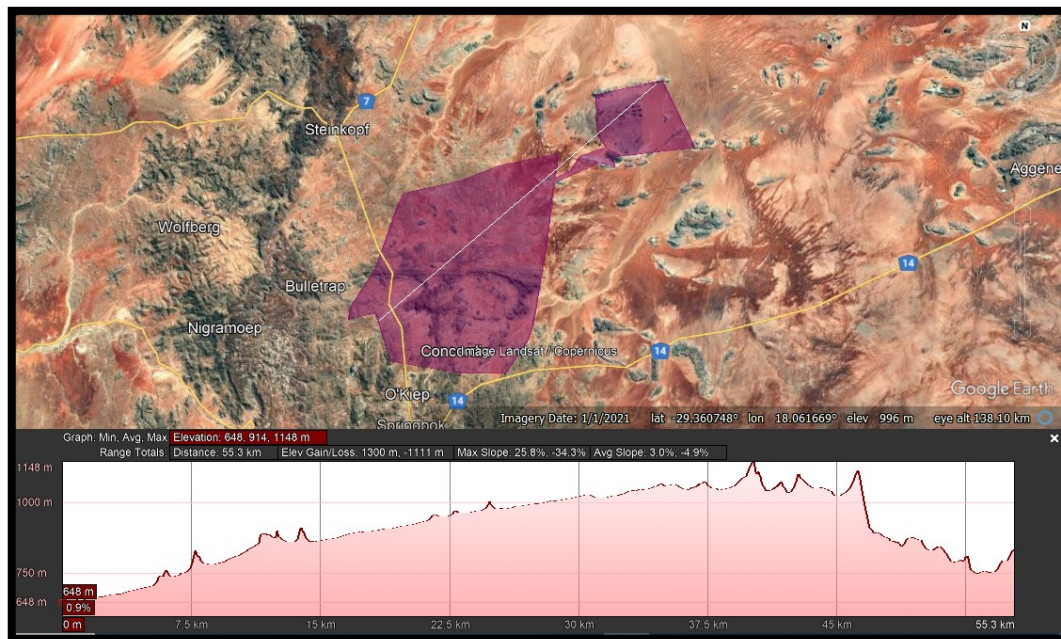


Figure 8: Elevation profile of the proposed prospecting footprint (Image obtained from Google Earth).

### VISUAL CHARACTERISTICS

The viewshed analysis showed that the visual impact of the proposed prospecting operation will be of low significance. The small scale of the proposed operation contributes to the low visual significance. Should the Applicant successfully rehabilitate the prospecting areas (upon closure), no residual visual impact is expected upon closure of the prospecting activities.

## AIR AND NOISE QUALITY

The air quality of the study area is generally very good given the area's predominant agricultural use and rural character. Likewise, the noise ambiance is very low (classified as ambient rural / pastoral) with noise levels mainly affected by traffic along roads in the vicinity, and the farming equipment operational in the area.

## GEOLOGY AND SOIL

The proposed area is characterized by a number of Mokolian granites and gneisses (most widespread is the Kamieskroon Gneiss) form gentle to moderate rocky slopes, rock sizes varying from medium to large with flat to gentle rock sheets as well as rock domes, yellow brown to brown loamy sand, 0.15–0.6 m deep. Ag and Ib land types (35% each), followed by Fb and Fc (10% each).

## HYDROLOGY

The site falls within quaternary catchment D82D & F30E which forms part of the Lower Orange Water Management Area (WMA) which is managed by the Department of Water and Sanitation (DWS). According to the National Freshwater Ecosystem Priority Areas (NFEPA) map as presented by SANBI, a few NFEPA river intersects with the proposed prospecting footprint.

mitigation measures should be adhered to minimise the impact.

Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

*Table 10: Aquatic characteristics of the greater study area*

<b>Water Management Area</b>	Lower Orange Water Management Area
<b>Quaternary Catchment</b>	D82D & F30E
<b>Rivers (NFEPA)</b>	5

## BIOLOGICAL ENVIRONMENT

### MINING AND BIODIVERSITY

*(Information extracted from the Mining and Biodiversity Guideline: Mainstreaming Biodiversity into the Mining Sector, Department of Environmental Affairs, Department of Mineral Resources and Energy, Chamber of Mines, 2013)*

The Mining and Biodiversity Guideline, compiled by the South African Mining and Biodiversity Forum (SAMBF) provides the mining sector with a practical, user-friendly manual for integrating biodiversity considerations into planning processes and managing biodiversity during the developmental and operational phases of a mine, from exploration through to closure.

When the prospecting footprint is layered over the Mining and Biodiversity Map, overlaps areas of biodiversity importance with a corresponding rating of highest risk for mining (dark brown area), brown – high biodiversity importance, high risk for mining. Light brown – moderate biodiversity importance, moderate risk for mining.

Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

### **BIODIVERSITY CONSERVATION AREAS**

The prospecting activities does not require the removal of any large trees or vegetation of significance. According to the 2016 Northern Cape Critical Biodiversity Areas, SANBI map, the proposed prospecting areas intercept with a Critical Biodiversity Areas 1 and 2 along with an Ecological Support Area in the bigger south-west portion of the proposed site.

Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

### **GROUNDCOVER**

According to Mucina & Rutherford (2006), the Project Area is situated in the Namaqualand Klipkoppe Shrubland (SKn 1), Namaqualand Blomveld (SKn 3), Bushmanland Inselberg Shrubland (SKr 18) and Aggeneys Gravel Vygieveld (SKr 19) vegetation types according to SANBI (2018). Descriptions of the vegetation types are taken directly from Mucina & Rutherford (2006). Most of the area consists of dramatic landscapes of huge granite and gneiss domes, smooth glaxis and disintegrating boulder koppies supporting open shrubland up to 1 m tall, dominated by shrubs of dwarf to medium stature and with ericoid or succulent leaves. A few scattered *pachycaul kokerboom* trees (*Aloe dichotoma* var. *dichotoma*) are found mostly on north-facing slopes. Flat or gently sloping rock sheets (the dominant feature of this unit) support dwarf or prostrate succulents in shallow pockets with soil or in cracks. Fringe vegetation

at the bottom of steep rock sheets (collecting run-off water) consists of 1–3 m tall shrubs with nonsucculent leaves and canopy cover reaching 40–100%.

## **FAUNA**

Various small mammals and reptiles occur are likely to on the property. The fauna at the site will not be impacted by the proposed prospecting activity as they will be able to move away or through the site, without being harmed. Workers should be educated and managed to ensure that no fauna at the site is harmed. These sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners. Should this prospecting right be granted farm owners will be consulted prior to commencement of any activities to ensure that safety of animals and workers. Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

## **HUMAN ENVIRONMENT:**

### **CULTURAL AND HERITAGE ENVIRONMENT**

As per the screening report, the area has a majority low heritage impact with small section that show Very High sensitivity (these areas are to be completely avoided) but has a medium palaeontology sensitivity and according to the SAHRA Paleontological sensitivity map the study area extend over an area of low and insignificant/zero (grey) concern.

Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

The South African Heritage Resources Agency (SAHRA) compiled the Palaeontological (fossil) Sensitivity Map (PSM) to guide developers, heritage officers and practitioners in screening paleontologically sensitive areas at the onset of a project. When the footprint of the earmarked prospecting area is placed on the PSM, it shows the study area to extend over an area of

insignificant/zero (grey) concern as presented in the figure below. Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

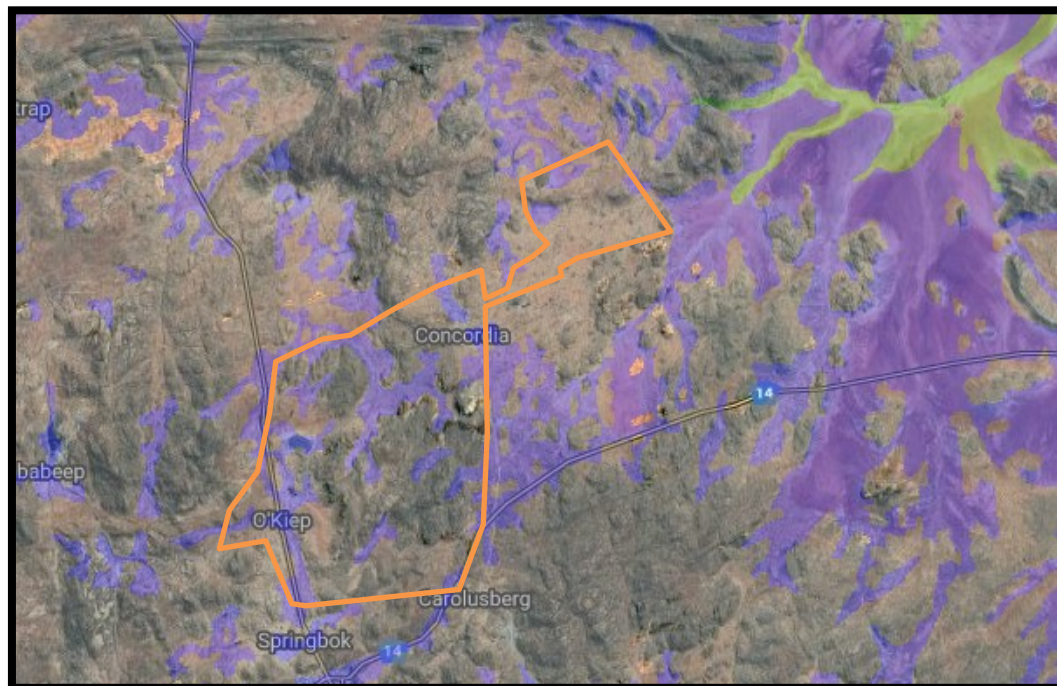


Figure 9: Screenshot from the SAHRIS palaeo-sensitivity map showing the location of the proposed prospecting area (orange polygon) falls in an area of insignificant/zero (grey) concern (Source: <https://sahris.sahra.org.za/map/palaeo>).

## **SOCIO-ECONOMIC ENVIRONMENT**

*(Information extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)*

The Municipal Systems Act 2000 requires each municipality to prepare an Integrated Development Plan (IDP) for its jurisdiction area for a five-year period when a new Council are elected. The legislation stipulates further that the IDP must be revised annually to determine progress and to make amendments accordingly to satisfy Council's strategic objectives. This is the IDP of Namakwa District Municipality for the period 2022-2027 and will be revised annually. The IDP process is guided by different legislations, policies and guidelines.

The Nama Khoi Local Municipality is a Category B municipality and accounts for 12% of the district geographical area. Farming settlements in the municipality are Dwagga Soutpan, Vrugbaar, Raap- en-Skraap and Klein Pella. The municipality is characterized by vast tracts of land, pristine natural environment and unique mountains. Its limited cell phone reception can be

regarded as a unique attraction by some urban dwellers who wish to escape the rush of the cities. This inherent potential for eco-tourism needs to be exploited and managed in a sustainable manner in order to retain this unique setting. Gamsberg zinc mine, one of the world's biggest zinc deposits are located in the Khai- Ma Municipal Area. Gamsberg is situated about 30km from Black Mountain Mining (BMM) in Aggeneys. Gamsberg comprises an open pit mine and a dedicated processing plant. This municipality forms part of a proposed SEZ (Special Economic Zone) in the Northern Cape, with an anchor project in the Vedanta Zinc smelter in the Aggeneys (Gamsberg) area, with further downstream activities including possible agro processing. The Orange River, which is the northern border of the municipality, is an economic stimulus for the area with several irrigation projects at Onseepkans, Witbank, and the lower Orange River.

#### Population and Gender Profile

With 141 000 people, the Namakwa District Municipality housed 0.2% of South Africa's total population in 2020. Between 2010 and 2020 the population growth averaged 1.19% per annum which is slightly lower than the growth rate of South Africa as a whole (1.59%). Compared to Northern Cape's average annual growth rate (1.98%), the growth rate in Namakwa's population at 1.19% was close to half than that of the province.

The population projection of Namakwa District Municipality shows an estimated average annual growth rate of 1.1% between 2020 and 2025. The average annual growth rate in the population over the forecasted period for Northern Cape Province and South Africa is 1.6% and 1.3% respectively. The Northern Cape Province is estimated to have average growth rate of 1.6% which is higher than the Namakwa District Municipality. The South Africa as a whole is estimated to have an average annual growth rate of 1.3% which is higher than that of Namakwa's growth rate. The total population of a region is the total number of people within that region measured in the middle of the year. Total population can be categorised according to the population group, as well as the sub-categories of age and gender. The population groups include African, White, Coloured and Asian, where the Asian group includes all people originating from Asia, India and China. The age subcategory divides the population into 5-year cohorts, e.g. 0-4, 5-9, 10-13, etc.



	Male	Female	Total
Namakwa	70,461	70,541	141,002
Pixley ka Seme	110,547	113,378	223,924
ZF Mgcawu	147,097	141,414	288,511
Frances Baard	216,842	230,497	447,340
John Taolo Gaetsewe	130,246	136,552	266,798
<b>Northern Cape</b>	<b>675,194</b>	<b>692,382</b>	<b>1,367,576</b>

Figure 10: Population by gender – (extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)

Namakwa District Municipality's male/female split in population was 99.9 males per 100 females in 2020. The Namakwa District Municipality has significantly more males (49.97%) relative to South Africa (48.97%), and what is typically seen in a stable population. This is usually because of physical labour-intensive industries such as mining. In total there were 70 500 (50.03%) females and 70 500 (49.97%) males. This is different from the Northern Cape

Table 11: Population percentage of each ethnic group – extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)

	African		White		Coloured		Asian	
	Female	Male	Female	Male	Female	Male	Female	Male
00-04	343	321	202	178	3,960	4,360	39	44
05-09	280	297	229	266	3,900	4,350	48	76
10-14	275	312	229	230	4,280	4,380	66	58
15-19	335	355	198	223	4,400	4,890	67	31
20-24	454	465	236	242	4,370	4,340	48	26
25-29	565	672	284	305	4,560	4,300	69	36
30-34	543	923	288	313	4,320	4,150	26	24
35-39	423	1,100	314	290	4,210	4,090	66	49
40-44	279	740	327	338	4,290	4,100	25	50
45-49	291	464	450	448	4,170	4,260	28	80
50-54	205	303	474	460	3,950	3,610	12	73
55-59	143	172	582	555	3,290	3,120	23	11
60-64	103	105	584	508	2,850	2,500	12	12
65-69	125	110	628	571	2,660	2,030	21	8
70-74	152	198	449	490	1,730	1,380	6	7
75+	102	99	987	544	1,940	1,390	12	6
<b>Total</b>	<b>4,620</b>	<b>6,630</b>	<b>6,460</b>	<b>5,960</b>	<b>58,900</b>	<b>57,300</b>	<b>567</b>	<b>592</b>

In 2020, the Namakwa District Municipality's population consisted of 7.98% African (11 200), 8.81% White (12 400), 82.39% Coloured (116 000) and 0.82% Asian (1 160) people. The largest share of population is within the young working age (25-44 years) age category with a total number of 42 100 or 29.8% of the total population. The age category with the second largest number of people is the older working age (45-64 years) age category with a total share of 24.0%, followed by the babies and kids (0-14 years) age category with 28



700 people. The age category with the least number of people is the retired / old age (65 years and older) age category with only 15 700 people.

### Education

Within Namakwa District Municipality, the number of people without any schooling decreased from 2010 to 2020 with an average annual rate of -3.73%, while the number of people within the 'matric only' category, increased from 15,800 to 24,100. The number of people with 'matric and a certificate/diploma' increased with an average annual rate of 4.33%, with the number of people with a 'matric and a Bachelor's' degree increasing with an average annual rate of 2.14%. Overall improvement in the level of education is visible with an increase in the number of people with 'matric' or higher education.

*Table 12: Educational level – (extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)*

	Namakwa	Northern Cape	National Total	Namakwa as % of province	Namakwa as % of national
No schooling	3,820	56,600	1,810,000	6.7%	0.21%
Grade 0-2	917	11,600	551,000	7.9%	0.17%
Grade 3-6	10,600	93,700	2,900,000	11.3%	0.36%
Grade 7-9	30,600	187,000	6,020,000	16.4%	0.51%
Grade 10-11	20,100	205,000	9,480,000	9.8%	0.21%
Certificate / diploma without matric	432	3,580	197,000	12.1%	0.22%
Matric only	24,100	246,000	12,100,000	9.8%	0.20%
Matric certificate / diploma	6,560	46,500	2,570,000	14.1%	0.26%
Matric Bachelors degree	2,230	22,200	1,720,000	10.0%	0.13%
Matric Postgrad degree	884	9,830	848,000	9.0%	0.10%

### Households

Namakwa District Municipality had a total number of 26 000 (62.23% of total households) very formal dwelling units, a total of 13 600 (32.60% of total households) formal dwelling units and a total number of 1 120 (2.68% of total households) informal dwelling units.

#### Household dynamics

The region within the Namakwa District Municipality with the highest number of very formal dwelling units is the Nama Khoi Local Municipality with 11 900 or a share of 45.65% of the total very formal dwelling units within Namakwa District Municipality. The region with the lowest number of very formal dwelling units is

the Kamiesberg Local Municipality with a total of 1 200 or a share of 4.62% of the total very formal dwelling units within Namakwa District Municipality.

*Table 13: Household dynamics – (extracted from the extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)*

	Very Formal	Formal	Informal	Traditional	Other dwelling type	Total
Richtersveld	3,078	1,288	121	83	68	4,638
Nama Khoi	11,857	3,409	714	158	150	16,288
Kamiesberg	1,201	2,320	30	20	50	3,620
Hantam	5,035	2,699	75	126	37	7,972
Karoo Hoogland	2,766	1,970	47	15	15	4,813
Khai-Ma	2,036	1,919	131	292	28	4,406
<b>Total Namakwa</b>	<b>25,973</b>	<b>13,605</b>	<b>1,118</b>	<b>692</b>	<b>347</b>	<b>41,736</b>

### Household services

Namakwa District Municipality had a total number of 31 300 flush toilets (74.92% of total households), 7 390 Ventilation Improved Pit (VIP) (17.71% of total households) and 1 490 (3.58%) of total household's pit toilets. The region within Namakwa with the highest number of flush toilets is Nama Khoi Local Municipality with 12 600 or a share of 40.31% of the flush toilets within Namakwa. The region with the lowest number of flush toilets is Kamiesberg Local Municipality with a total of 1 520 or a share of 4.85% of the total flush toilets within Namakwa District Municipality.

*Table 14: Household services – (extracted from the extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)*

	Flush toilet	Ventilation Improved Pit (VIP)	Pit toilet	Bucket system	No toilet	Total
Richtersveld	3,863	497	162	15	100	4,638
Nama Khoi	12,603	2,375	802	111	396	16,288
Kamiesberg	1,518	1,812	77	117	97	3,620
Hantam	6,787	801	101	78	205	7,972
Karoo Hoogland	3,109	1,303	205	48	147	4,813
Khai-Ma	3,386	602	145	21	252	4,406
<b>Total Namakwa</b>	<b>31,266</b>	<b>7,390</b>	<b>1,493</b>	<b>390</b>	<b>1,197</b>	<b>41,736</b>

Table 15: Households by type of water access – (extracted from the extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)

	Piped water inside dwelling	Piped water in yard	Communal piped water: less than 200m from dwelling (At RDP-level)	Communal piped water: more than 200m from dwelling (Below RDP)	No formal piped water	Total
Richtersveld	3,364	1,152	56	8	58	4,638
Nama Khoi	13,503	2,544	127	20	93	16,288
Kamiesberg	1,482	2,110	8	2	19	3,620
Hantam	5,236	2,595	92	11	38	7,972
Karoo	3,433	1,355	10	1	15	4,813
Hoogland						
Khai-Ma	2,589	1,719	11	1	85	4,406
<b>Total Namakwa</b>	<b>29,607</b>	<b>11,475</b>	<b>303</b>	<b>42</b>	<b>308</b>	<b>41,736</b>

The regions within Namakwa District Municipality with the highest number of households with piped water inside the dwelling is Nama Khoi Local Municipality with 13 500 or a share of 45.61% of the households with piped water inside the dwelling within Namakwa District Municipality. The region with the lowest number of households with piped water inside the dwelling is Kamiesberg Local Municipality with a total of 1 480 or a share of 5.00% of the total households with piped water inside the dwelling within Namakwa District Municipality.

Table 16: Households by type of electrical connection – (extracted from the extracted from the Namakwa District Municipality Amended Integrated Development Plan 2022/27)

	Electricity for lighting only	Electricity for lighting and other purposes	Not using electricity	Total
Richtersveld	74	4,428	136	4,638
Nama Khoi	319	15,450	519	16,288
Kamiesberg	365	3,112	142	3,620
Hantam	1,156	5,759	1,056	7,972
Karoo Hoogland	1,232	2,636	945	4,813
Khai-Ma	286	3,907	212	4,406
<b>Total Namakwa</b>	<b>3,432</b>	<b>35,293</b>	<b>3,011</b>	<b>41,736</b>

Namakwa District Municipality had a total number of 3 430 (8.22%) households with electricity for lighting only, a total of 35 300 (84.56%) households had electricity for lighting and other purposes and a total number of 3 010 (7.21%) households did not use electricity.

The region within Namakwa with the highest number of households with electricity for lighting and other purposes is Nama Khoi Local Municipality with

15 400 or a share of 43.78% of the households with electricity for lighting and other purposes within Namakwa District Municipality. The Region with the lowest number of households with electricity for lighting and other purposes is Karoo Hoogland Local Municipality with a total of 2 640 or a share of 7.47% of the total households with electricity for lighting and other purposes within Namakwa District Municipality.

**(b) Description of the current land uses**

The area surrounding the prospecting right in Concordia, Northern Cape, is characterized by a mix of land uses and features typical of rural settings. Within a 500m radius of the prospecting site, predominant land uses include livestock grazing, subsistence farming, and small-scale agricultural activities. The region is also known for its historical mining legacy, with remnants of old mining infrastructure and tailings in certain areas. Residential areas may consist of scattered farmsteads or small settlements, often housing local communities engaged in agriculture or mining-related livelihoods. Prominent features may include community water sources, such as boreholes or seasonal streams, and cultural or heritage sites reflecting the area's historical significance. Additionally, the natural environment is marked by open grasslands and sparse vegetation, typical of the Succulent Karoo Biome, which supports biodiversity and local grazing activities.

The proposed prospecting activities will consider these land uses and features to minimize disruptions. By ensuring careful planning and continuous consultation with local stakeholders, the project aims to coexist harmoniously with the current socio-economic activities in the area.

*Table 17: Land uses and/or prominent features that occur within 500m radius of S1 – Since the final layout plan or drilling plan for the project has not yet been developed, all drilling activities will be carefully planned to avoid occurring within 500m of these land uses.*

<b>LAND USE CHARACTER</b>	<b>YES</b>	<b>NO</b>	<b>DESCRIPTION</b>
Natural area	<b>YES</b>	-	The study area is surrounded by natural areas used for agricultural purposes.
Low density residential	-	<b>NO</b>	
Medium density residential	-	<b>NO</b>	
High density residential	-	<b>NO</b>	
Informal residential	-	<b>NO</b>	
Retail commercial & warehousing	-	<b>NO</b>	
Light industrial	-	<b>NO</b>	
Medium industrial	-	<b>NO</b>	
Heavy industrial	-	<b>NO</b>	
Power station	-	<b>NO</b>	
High voltage power line	-	<b>NO</b>	
Office/consulting room	-	<b>NO</b>	
Military or police base / station / compound	-	<b>NO</b>	
Spoil heap or slimes dam	-	<b>NO</b>	
Quarry, sand or borrow pit	-	<b>NO</b>	
Dam or reservoir	-	<b>NO</b>	
Hospital/medical centre	-	<b>NO</b>	
School/ crèche	-	<b>NO</b>	
Tertiary education facility	-	<b>NO</b>	
Church	-	<b>NO</b>	
Old age home	-	<b>NO</b>	
Sewage treatment plant	-	<b>NO</b>	
Train station or shunting yard	-	<b>NO</b>	
Railway line	-	<b>NO</b>	
Major road (4 lanes or more)	-	<b>NO</b>	
Airport	-	<b>NO</b>	
Harbour	-	<b>NO</b>	
Sport facilities	-	<b>NO</b>	
Golf course	-	<b>NO</b>	
Polo fields	-	<b>NO</b>	
Filling station	-	<b>NO</b>	
Landfill or waste treatment site	-	<b>NO</b>	
Plantation	-	<b>NO</b>	
Agriculture	-	<b>NO</b>	
River, stream or wetland	-	<b>NO</b>	
Nature conservation area	-	<b>NO</b>	
Mountain, hill or ridge	<b>YES</b>	-	
Museum	-	<b>NO</b>	
Historical building	-	<b>NO</b>	
Protected Area	-	<b>NO</b>	
Graveyard	-	<b>NO</b>	
Archaeological site	-	<b>NO</b>	
Other land uses (describe)	-	<b>NO</b>	

**(c) Description of specific environmental features and infrastructure on the site.**

**SPECIFIC ENVIRONMENTAL FEATURES**

**SITE SPECIFIC TOPOGRAPHY**

As previously mentioned, the topography of the study area consists of level to slightly undulating sedimentary surfaces between rocky granitic hills and mountains, such as wide plains and broad valleys with dry channels of intermittent water courses. The elevation loss from the north-east corner to the south-west corner of the proposed footprint is 1111 m over 55 km.

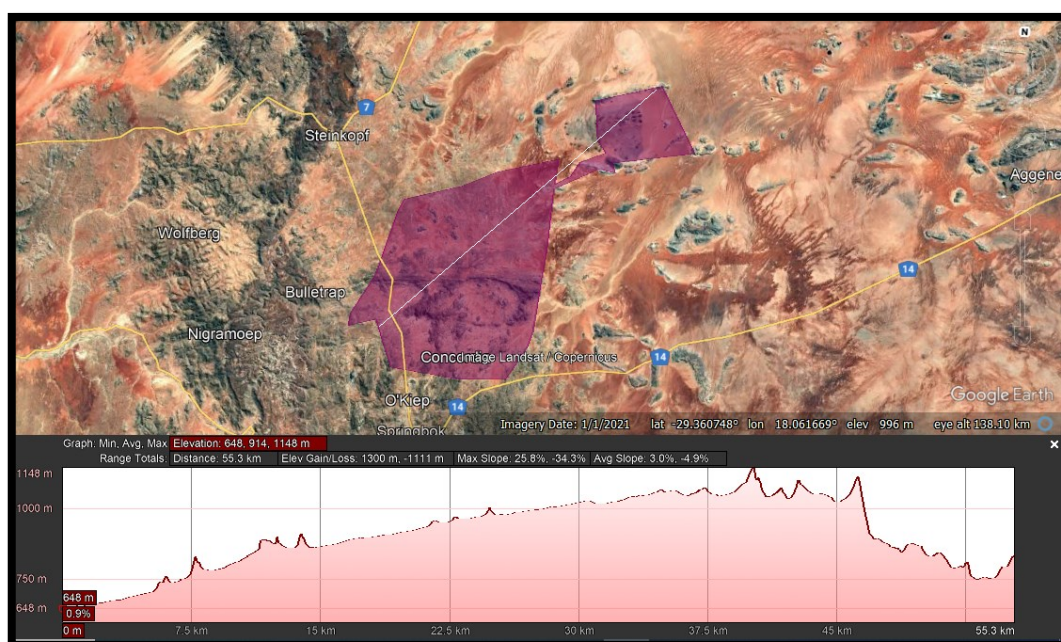


Figure 11: Elevation profile of the proposed prospecting footprint (Image obtained from Google Earth).

**SITE SPECIFIC VISUAL CHARACTERISTICS**

The figure below shows the viewshed analysis for the footprint within a ±10 km radius. The green shaded areas show the positions from where the prospecting area will be visible. From this analysis it is proposed that the visual impact of the proposed prospecting right operation will be of low significance, especially as no permanent structures. Should the Applicant successfully rehabilitate the prospecting areas (upon closure), no residual visual impact is expected upon closure of the prospecting activities.





Figure 12: Viewshed of the proposed prospecting footprint where the green shaded areas show the positions from where the prospecting area (purple polygon) will be visible. (Image obtained from Google Earth).

### SITE SPECIFIC AIR AND NOISE QUALITY

The proposed activity will contribute the emissions of drilling equipment and field vehicles the receiving environment for the duration of the operational phase. Should the prospecting right holder implement the mitigation measures proposed in this document and the EMPr the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use. The potential impact on the noise ambience of the receiving environment is expected to be of low significance and representative of the machinery already operational at the property.

Emission into the atmosphere is controlled by the National Environmental Management: Air Quality Act, 2004. The proposed prospecting activity does not trigger an application in terms of the said act. Should the prospecting right holder implement the mitigation measures proposed in this document and the

EMPR the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use.

### SITE SPECIFIC GEOLOGY AND SOIL

*(Information extracted from the Prospecting Work Programme (PWP) for the proposed prospecting right)*

As per the Prospecting Work Programme (Appendix M), foliated granites, granitic orthogneisses and late- to post-tectonic granites are extensively represented in all the metamorphic zones (Geology Map below), including the high-T granulite-facies (aged 1033 Ma, 1200 Ma, 1060 Ma and 1030 Ma). Heat produced during radioactive decay in these rocks was largely responsible for their metamorphic conditions, especially where granulite and charnockite formation was promoted by the circulation of U–Th–REE-rich, H<sub>2</sub>O-deficient fluids and melts. Hosts granulite-facies granitic plutons with the highest concentrations of heat-producing elements (K, U and Th). There are also numerous late-stage smaller intrusions of U-rich leucogranite that may constitute potential resources of uranium.



Figure 13: Map representing the general geology of the proposed area (image retrieved from Google Earth)

### SITE SPECIFIC HYDROLOGY

The site falls within quaternary catchment D82D & F30E which forms part of the Lower Orange Water Management Area (WMA) which is managed by the Department of Water and Sanitation (DWS). According to the National



Freshwater Ecosystem Priority Areas (NFEPA) map as presented by SANBI, a few NFEPA river intersects with the proposed prospecting footprint. Since the final layout plan or drilling plan for the project has not yet been developed, all drilling activities will be carefully planned to avoid these sensitive areas.

Table 18: Aquatic characteristics of the greater study area

<b>Water Management Area</b>	Lower Orange Water Management Area
<b>Quaternary Catchment</b>	D82D & F30E
<b>Rivers (NFEPA)</b>	5

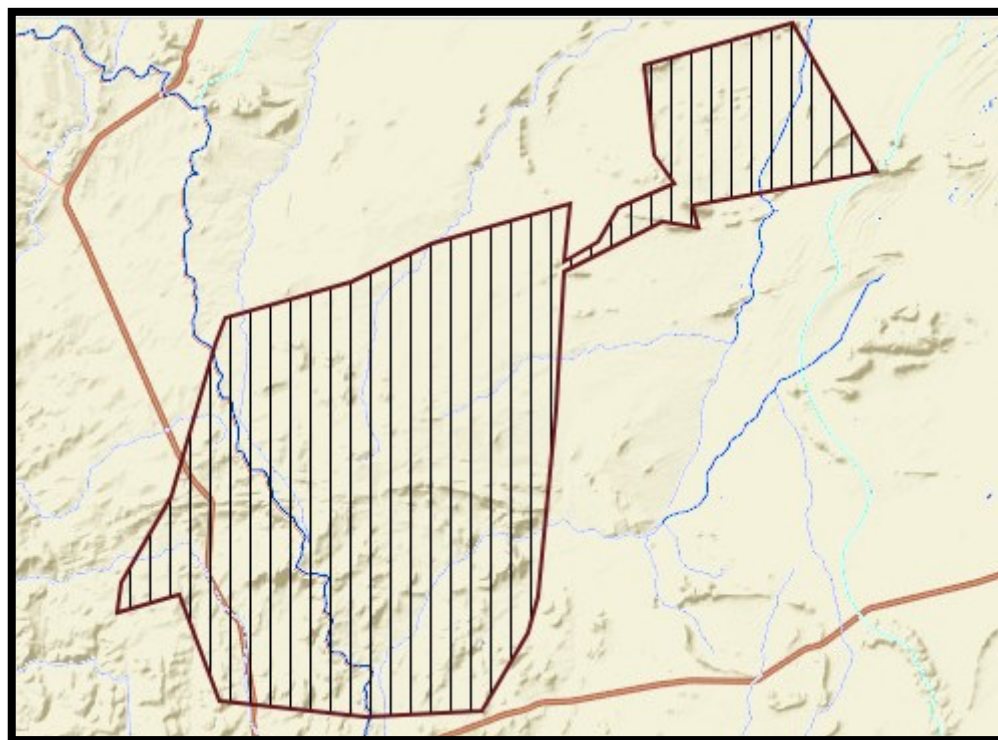


Figure 14: Map showing the proposed prospecting footprint (red polygon) and NFEPA rivers. (Image obtained from BGIS map viewer)

**SITE SPECIFIC MINING AND BIODIVERSITY CONSERVATION AREAS**

The Mining and Biodiversity Guideline, compiled by the South African Mining and Biodiversity Forum (SAMBF) provides the mining sector with a practical, user-friendly manual for integrating biodiversity considerations into planning processes and managing biodiversity during the developmental and operational phases of a mine, from exploration through to closure.

When the prospecting footprint is layered over the CBA, as shown in the figure below, overlaps areas of biodiversity importance with a corresponding rating of highest risk for mining (dark brown area), brown – high biodiversity importance, high risk for mining. Light brown – moderate biodiversity importance, moderate risk for mining. See table below for description according to The Mining and Biodiversity Guideline’s The guideline notes that environmental screening, the EIA and specialists should focus on confirming the presence and significance of biodiversity features and provide a site-specific basis on which to apply the mitigation hierarchy to inform regulatory decision-making.

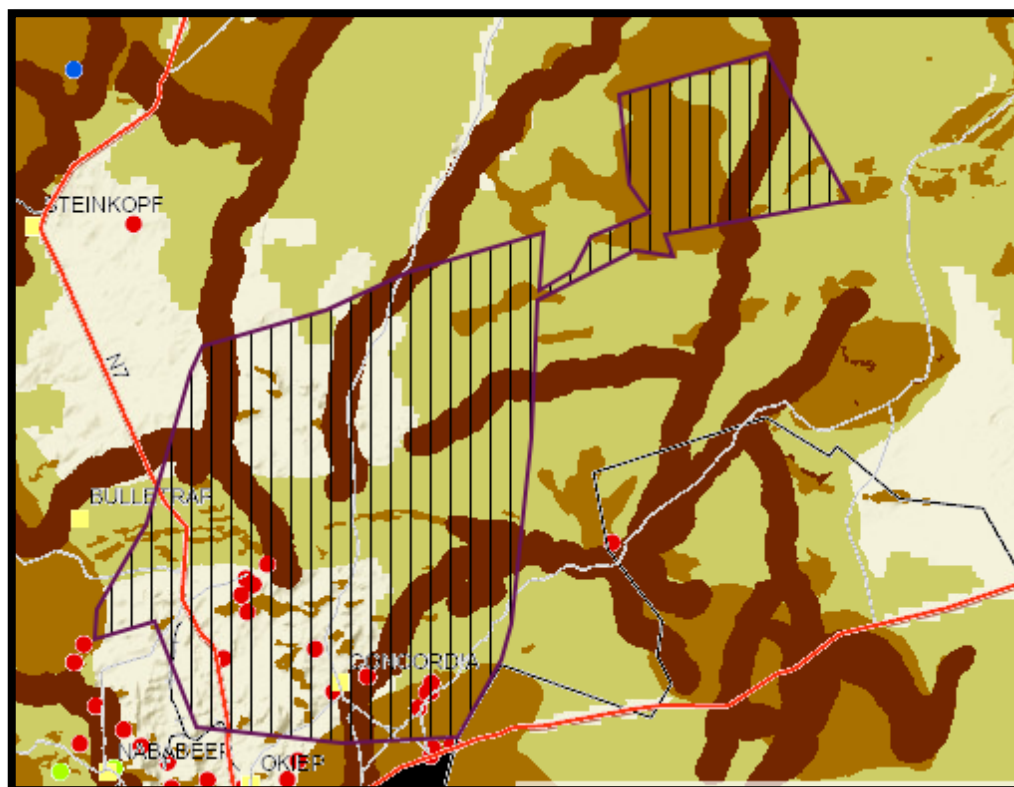


Figure 15: The Mining and Biodiversity importance map with the proposed mining footprint (green polygon). Dark brown – high biodiversity importance, high risk for mining, light brown – moderate biodiversity Importance, moderate risk for mining (image obtained from the BGIS Map Viewer – Mining Guidelines).

Table 19: Four categories of biodiversity priority areas in relation to their biodiversity importance and implications for mining. (table obtained from The Mining and Biodiversity Guideline, compiled by the South African Mining and Biodiversity Forum (SAMBF))

Category	Biodiversity priority areas	Risk for mining	Implications for mining
<b>A. Legally protected</b>	<ul style="list-style-type: none"> <li>Protected areas (including National Parks, Nature Reserves, World Heritage Sites, Protected Environments, Nature Reserves)</li> <li>Areas declared under Section 49 of the Mineral and Petroleum Resources Development Act (No. 28 of 2002)</li> </ul>	<b>Mining prohibited</b>	Mining projects cannot commence as mining is legally prohibited. Although mining is prohibited in Protected Areas, it may be allowed in Protected Environments if both the Minister of Mineral Resources and Minister of Environmental Affairs approve it. In cases where mining activities were conducted lawfully in protected areas before Section 48 of the Protected Areas Act (No. 57 of 2003) came into effect, the Minister of Environmental Affairs may, after consulting with the Minister of Mineral Resources, allow such mining activities to continue, subject to prescribed conditions that reduce environmental impacts.
<b>B. Highest biodiversity importance</b>	<ul style="list-style-type: none"> <li>Critically endangered and endangered ecosystems</li> <li>Critical Biodiversity Areas (or equivalent areas) from provincial spatial biodiversity plans</li> <li>River and wetland Freshwater Ecosystem Priority Areas (FEPAs) and a 1km buffer around these FEPAs</li> <li>Ramsar Sites</li> </ul>	<b>Highest risk for mining</b>	Environmental screening, environmental impact assessment (EIA) and their associated specialist studies should focus on confirming the presence and significance of these biodiversity features, and to provide site-specific basis on which to apply the mitigation hierarchy to inform regulatory decision-making for mining, water use licences, and environmental authorisations. If they are confirmed, the likelihood of a fatal flaw for new mining projects is very high because of the significance of the biodiversity features in these areas and the associated ecosystem services. These areas are viewed as necessary to ensure protection of biodiversity, environmental sustainability, and human well-being. An EIA should include the strategic assessment of optimum, sustainable land use for a particular area and will determine the significance of the impact on biodiversity. This assessment should fully take into account the environmental sensitivity of the area, the overall environmental and socio-economic costs and benefits of mining, as well as the potential strategic importance of the minerals to the country. Authorisations may well not be granted. If granted, the authorisation may set limits on allowed activities and impacts, and may specify biodiversity offsets that would be written into licence agreements and/or authorisations.
<b>C. High biodiversity importance</b>	<ul style="list-style-type: none"> <li>Protected area buffers (including buffers around National Parks, World Heritage Sites and Nature Reserves)</li> <li>Transfrontier Conservation Areas (remaining areas outside of formally proclaimed protected areas)</li> <li>Other identified priorities from provincial spatial biodiversity plans</li> <li>High water yield areas</li> <li>Coastal Protection Zone</li> <li>Estuarine functional zone</li> </ul> <p>Note that the status of buffer areas of World Heritage Sites is subject to a current intra-governmental process.</p>	<b>High risk for mining</b>	These areas are important for conserving biodiversity, for supporting or buffering other biodiversity priority areas, and for maintaining important ecosystem services for particular communities or the country as a whole. An EIA should include an assessment of optimum, sustainable land use for a particular area and will determine the significance of the impact on biodiversity. Mining options may be limited in these areas, and limitations for mining projects are possible. Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.
<b>D. Moderate biodiversity importance</b>	<ul style="list-style-type: none"> <li>Ecological support areas</li> <li>Vulnerable ecosystems</li> <li>Focus areas for protected area expansion (land-based and offshore protection)</li> </ul>	<b>Moderate risk for mining</b>	These areas are of moderate biodiversity value. EIAs and their associated specialist studies should focus on confirming the presence and significance of these biodiversity features, identifying features (e.g. threatened species) not included in the existing datasets, and on providing site-specific information to guide the application of the mitigation hierarchy. Authorisations may set limits and specify biodiversity offsets that would be written into licence agreements and/or authorisations.

## **SITE SPECIFIC BIODIVERSITY CONSERVATION AREAS**

As mentioned earlier, the prospecting activities does not require the removal of any large trees or vegetation of significance. According to the 2016 Northern Cape Critical Biodiversity Areas, SANBI map, the proposed prospecting areas intercept with a Critical Biodiversity Areas 1 and 2 along with an Ecological Support Area in the bigger south-west portion of the proposed site

The management objectives of Critical Biodiversity Areas (CBAs) 1 and 2 aim to reduce biodiversity loss and protect important ecosystems outside of protected areas.

The management objectives of an Ecological Support Area (ESA) involve maintaining the ecological functioning of a Conservation Biodiversity Area (CBA) or protected area, generating or delivering key ecosystem services, and meeting biodiversity targets for ecosystem types or species when it is not feasible to achieve them in natural or near natural areas .Although the proposed prospecting area does indeed fall in sections within an Ecological Support Area, however it can be considered that due to the small footprint of a borehole, the drill position can be manipulated to drill between the sensitive sites. In light of this, the impact of the prospecting operation on the vegetation cover of the receiving environment is deemed to be of low significance. Should the Applicant implement the mitigation measures proposed in the EMPr the impact of the proposed activity on the surrounding area in general is deemed to be of low significance.

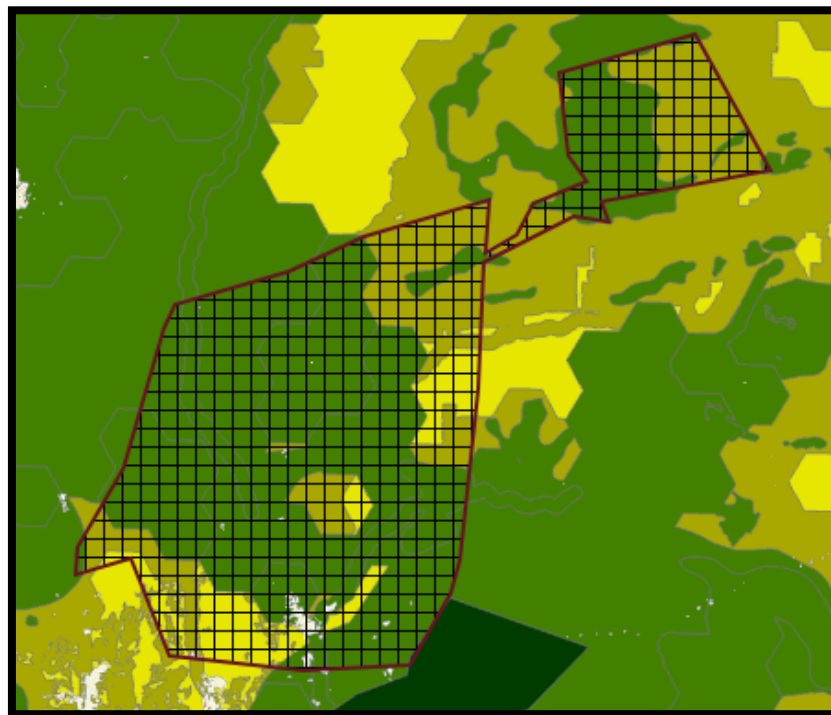
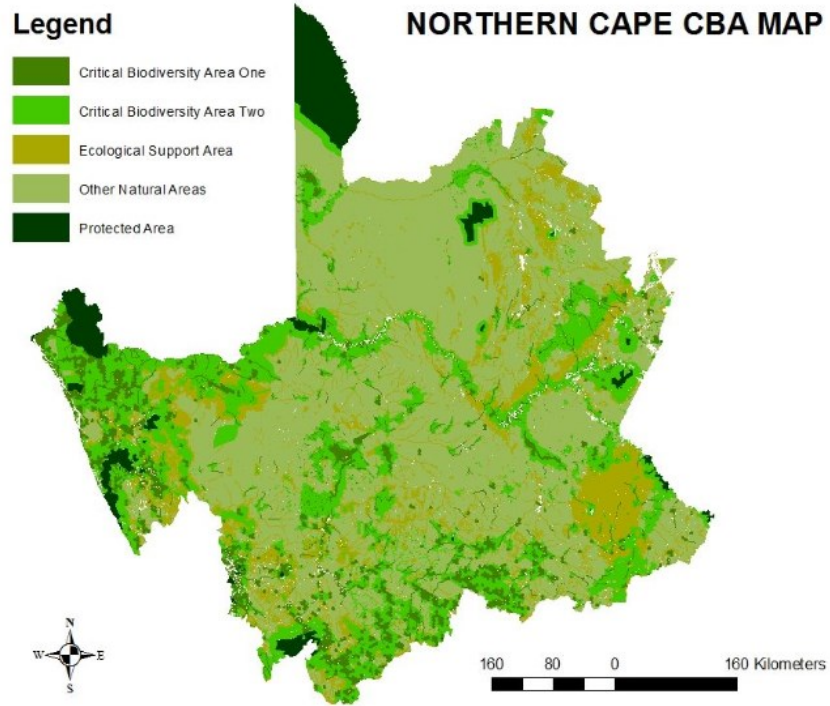


Figure 16: Northern Cape Critical Biodiversity Areas showing the mining area (red polygon) in relation to the ecological support areas (green). (Image obtained from BGIS Map Viewer – 2016 Northern Cape Critical Biodiversity Areas).

## **SITE SPECIFIC FAUNA**

Various small mammals and reptiles occur are likely to on the property. Small mammals, reptiles and insects will occur in the area. The screening tool shows the Animal Species sensitivity of the earmarked properties is high. As mentioned above, the proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done. Prospecting sites will be moved to various area depending on sensitivity and accessibility. Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas. Should the Applicant implement the mitigation measures proposed in the EMPr the impact of the proposed activity on the animal species in general is deemed to be of low significance, therefore it is proposed that no specialists' studies in this regard will be required

## **SITE SPECIFIC CULTURAL, HERITAGE AND PALAEOLOGICAL ENVIRONMENT**

As per the screening report, the area has a majority low heritage impact with small section that show Very High sensitivity (these areas are to be completely avoided) but has a medium palaeontology sensitivity and according to the SAHRA Paleontological sensitivity map the study area extend over an area of low and insignificant/zero (grey) concern.

Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

The South African Heritage Resources Agency (SAHRA) compiled the Palaeontological (fossil) Sensitivity Map (PSM) to guide developers, heritage officers and practitioners in screening paleontologically sensitive areas at the onset of a project. When the footprint of the earmarked prospecting area is placed on the PSM, it shows the study area to extend over an area of



insignificant/zero (grey) concern as presented in the figure below. Please refer to Part A(1)(h)(iv)(c) for more specific information of the area.

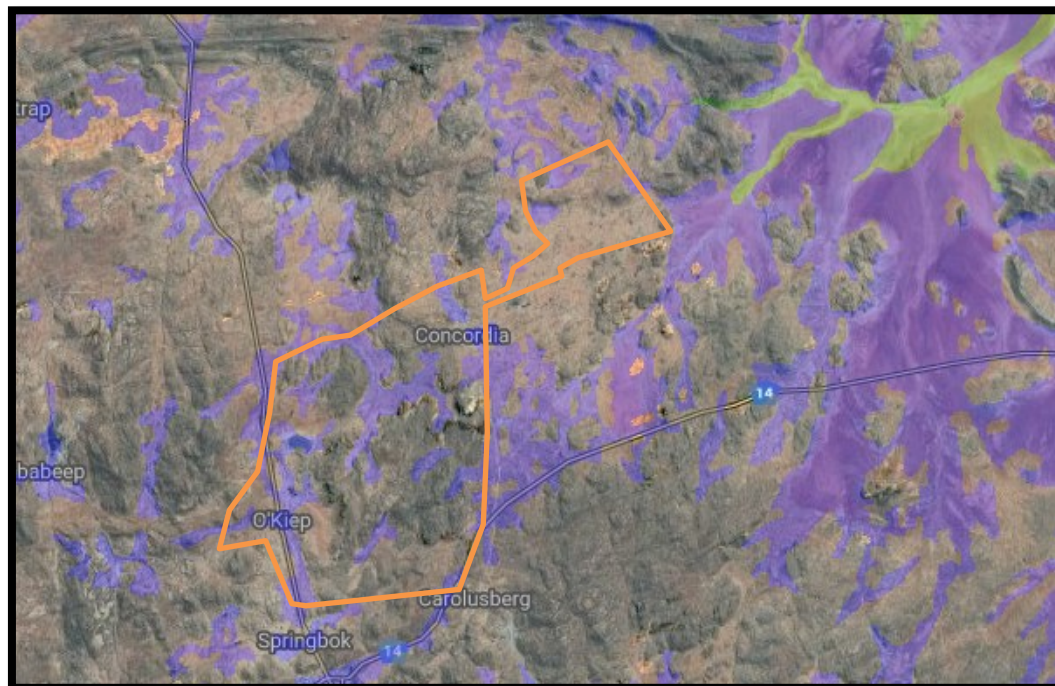


Figure 17: Screenshot from the SAHRIS palaeo-sensitivity map showing the location of the proposed prospecting area (orange polygon) falls in an area of insignificant/zero (grey) concern (Source: <https://sahris.sahra.org.za/map/palaeo>).

**(d) Environmental and current land use map.**

(Show all environmental and current land use features)

The environmental and current land use map is attached as Appendix B.

**v) Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts.**

(Provide a list of the potential impacts identified of the activities described in the initial site layout that will be undertaken, as informed by both the typical known impacts of such activities, and as informed by the consultations with affected parties together with the significance, probability, and duration of the impacts. Please indicate the extent to which they can be reversed, the extent to which they may cause irreplaceable loss of resources, and can be avoided, managed or mitigated.)

The following potential impacts were identified of each main activity in each phase of the proposed project. The significance rating was determined using the methodology as explained under *vi) Methodology Used in Determining and Ranking the Significance*. The impact rating listed below was determined for each impact **prior** to bringing the proposed mitigation measures into consideration. The degree of mitigation indicates the possibility of partial, full or no mitigation of the identified impact.

### PLANNING AND SURFACE SAMPLING PHASE

Visual intrusion as a result of surface sampling phase

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	3	1	2	2	2	2	<b>4</b>				

Potential hydrocarbon contamination from leaks or spills

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None - full</b>					
5	3	2	3.3	3	4	3.5	<b>11.55</b>				

Potential impact on fauna within the footprint area

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
5	3	2	3.3	4	3	3.5	<b>11.55</b>				

Dust nuisance as a result of surface sampling.

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
1	1	1	1	1	5	3	<b>3</b>				

Noise nuisance as a result of surface sampling

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None- Partial</b>					
1	1	1	1	1	5	3	<b>3</b>				



Potential impact on the Safety of the area due to increased human concentration.

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	3	1	2	2	2	2	<b>4</b>				

Impact of the natural vegetation of the footprint.

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low - Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
3	4	1	2.6	3	2	2.5	<b>6.5</b>				

Deterioration of the access road to the prospecting area

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low - Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	4	2	2.6	3	2	2.5	<b>6.5</b>				
<b>Rating: Low - Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
3	4	1	2.6	3	2	2	<b>5.2</b>				

**CLOSING OF DRILL HOLES AND LANDSCAPING UPON CLOSURE OF THE PROSPECTING AREA**

Uncapped boreholes left by the contractor.

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low - Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
3	5	1	3	3	1	2	<b>6</b>				

Erosion after rehabilitation

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	3	1	2	2	2	2	<b>4</b>				

Impact of the natural vegetation of the footprint during decommissioning phase

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	5	1	2.6	2	2	2	<b>5.2</b>				

Potential impact associated with litter/hydrocarbon spills left due to decommissioning activities.

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
3	4	1	2.6	3	2	2.5	<b>6.5</b>				

Return of the prospecting area to agricultural use upon closure (**Positive Impact**)

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Medium-high</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
1	5	5	3.7	5	5	5	<b>18.5</b>				

**vi) 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.)

**Methodology for the assessment of the potential environmental, social and cultural impacts**

**DEFINITIONS AND CONCEPTS:**

**Environmental significance:**

The concept of significance is at the core of impact identification, evaluation and decision-making. The concept remains largely undefined and there is no international consensus on a single definition. The following common elements are recognised from the various interpretations:

- Environmental significance is a value judgement.
- The degree of environmental significance depends on the nature of the impact.
- The importance is rated in terms of both biophysical and socio-economic values.
- Determining significance involves the amount of change to the environment perceived to be acceptable to affected communities.

Significance can be differentiated into impact magnitude and impact significance. Impact magnitude is the measurable change (i.e. intensity, duration and likelihood). Impact significance is the value placed on the change by different affected parties (i.e. level of acceptability) (DEAT (2002) Impact Significance, Integrated Environmental Management, Information Series 5).

The concept of risk has two dimensions, namely the consequence of an event or set of circumstances, and the likelihood of particular consequences being realised (Environment Australia (1999) Environmental Risk Management).

**Impact**

The positive or negative effects on human well-being and / or the environment.

**Consequence**

The intermediate or final outcome of an event or situation OR it is the result, on the environment, of an event.

### **Likelihood**

A qualitative term covering both probability and frequency.

### **Frequency**

The number of occurrences of a defined event in a given time or rate.

### **Probability**

The likelihood of a specific outcome measured by the ratio of a specific outcome to the total number of possible outcomes.

### **Environment**

Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation (ISO 14004, 1996).

### **Methodology that will be used**

The environmental significance assessment methodology is based on the following determination:

$$\text{Environmental Significance} = \text{Overall Consequence} \times \text{Overall Likelihood}$$

### **Determination of Overall Consequence**

Consequence analysis is a mixture of quantitative and qualitative information, and the outcome can be positive or negative. Several factors can be used to determine consequence. For the purpose of determining the environmental significance in terms of consequence, the following factors were chosen: **Severity/Intensity, Duration and Extent/Spatial Scale**. Each factor is assigned a rating of 1 to 5, as described in the tables below.

### ***Determination of Severity / Intensity***

**Severity** relates to the nature of the event, aspect or impact to the environment and describes how severe the aspects impact on the biophysical and socio-economic environment.

The table below will be used to obtain an overall rating for severity, taking into consideration the various criteria.

Table 20: Table to be used to obtain an overall rating of severity, taking into consideration the various criteria.

Type of criteria	Rating				
	1	2	3	4	5
Quantitative	0-20%	21-40%	41-60%	61-80%	81-100%
Qualitative	Insignificant / non-harmful	Small / Potentially harmful	Significant/ Harmful	Great/ Very harmful	Disastrous Extremely harmful
Social/ Community response	Acceptable / I&AP satisfied	Slightly tolerable / Possible objections	Intolerable/ Sporadic complaints	Unacceptable / Widespread complaints	Totally unacceptable / Possible legal action
Irreversibility	Very low cost to mitigate/ High potential to mitigate impacts to level of insignificance/ Easily reversible	Low cost to mitigate	Substantial cost to mitigate/ Potential to mitigate impacts/ Potential to reverse impact	High cost to mitigate	Prohibitive cost to mitigate/ Little or no mechanism to mitigate impact. Irreversible
Biophysical (Air quality, water quantity and quality, waste production, fauna and flora)	Insignificant change / deterioration or disturbance	Moderate change / deterioration or disturbance	Significant change / deterioration or disturbance	Very significant change / deterioration or disturbance	Disastrous change / deterioration or disturbance

**Determination of Duration**

Duration refers to the amount of time that the environment will be affected by the event, risk or impact, if no intervention e.g., remedial action takes place.

Table 21: Criteria for the rating of duration.

Rating	Description
1	Up to ONE MONTH
2	ONE MONTH to THREE MONTHS (QUARTER)
3	THREE MONTHS to ONE YEAR
4	ONE to TEN YEARS
5	Beyond TEN YEARS

**Determination of Extent/Spatial Scale**

Extent or spatial scale is the area affected by the event, aspect or impact.

Table 22: Criteria for the rating of extent / spatial scale.

Rating	Description
1	Immediate, fully contained area
2	Surrounding area
3	Within Business Unit area of responsibility
4	Within the farm/neighbouring farm area
5	Regional, National, International

### ***Determination of Overall Consequence***

Overall consequence is determined by adding the factors determined above and summarized below, and then dividing the sum by 3.

*Table 23: Example of calculating overall consequence.*

<b>Consequence</b>	<b>Rating</b>
Severity	Example 4
Duration	Example 2
Extent	Example 4
<b>SUBTOTAL</b>	<b>10</b>
<b>TOTAL CONSEQUENCE:</b> (Subtotal divided by 3)	<b>3.3</b>

### **Determination of Likelihood:**

The determination of likelihood is a combination of Frequency and Probability. Each factor is assigned a rating of 1 to 5, as described below and in tables 6 and 7.

### ***Determination of Frequency***

Frequency refers to how often the specific activity, related to the event, aspect or impact, is undertaken.

*Table 24: Criteria for the rating of frequency.*

<b>Rating</b>	<b>Description</b>
1	Once a year or once/more during operation
2	Once/more in 6 Months
3	Once/more a Month
4	Once/more a Week
5	Daily

### ***Determination of Probability***

Probability refers to how often the activity or aspect has an impact on the environment.

*Table 25: Criteria for the rating of probability.*

<b>Rating</b>	<b>Description</b>
1	Almost never / almost impossible
2	Very seldom / highly unlikely
3	Infrequent / unlikely / seldom
4	Often / regularly / likely / possible
5	Daily / highly likely / definitely

**Overall Likelihood**

Overall likelihood is calculated by adding the factors determined above and summarised below, and then dividing the sum by 2.

Table 26: Example of calculating overall likelihood.

Consequence	Rating
Frequency	Example 4
Probability	Example 2
<b>SUBTOTAL</b>	<b>6</b>
<b>TOTAL LIKELIHOOD</b> (Subtotal divided by 2)	<b>3</b>

**Determination of Overall Environmental Significance:**

The multiplication of overall consequence with overall likelihood will provide the environmental significance, which is a number that will then fall into a range of **LOW**, **LOW-MEDIUM**, **MEDIUM**, **MEDIUM-HIGH** or **HIGH**, as shown in the table below.

Table 27: Determination of overall environmental significance.

Significance or Risk	Low	Low-Medium	Medium	Medium-High	High
Overall Consequence X Overall Likelihood	1 – 4.9	5 – 9.9	10 – 14.9	15 – 19.9	20 – 25

**Qualitative description or magnitude of Environmental Significance**

This description is qualitative and is an indication of the nature or magnitude of the Environmental Significance. It also guides the prioritisations and decision-making process associated with this event, aspect or impact.

Table 28: Description of environmental significance and related action required.

Significance	Low	Low-Medium	Medium	Medium-High	High
Impact Magnitude	Impact is of very low order and therefore likely to have very little real effect. Acceptable.	Impact is of low order and therefore likely to have little real effect. Acceptable.	Impact is real, and potentially substantial in relation to other impacts. Can pose a risk to company	Impact is real and substantial in relation to other impacts. Pose a risk to the company. Unacceptable	Impact is of the highest order possible. Unacceptable. Fatal flaw.
Action Required	Maintain current management measures. Where possible improve.	Maintain current management measures. Implement monitoring and evaluate to determine potential increase in risk.	Implement monitoring. Investigate mitigation measures and improve management measures to	Improve management measures to reduce risk.	Implement significant mitigation measures or implement alternatives.

Significance	Low	Low-Medium	Medium	Medium-High	High
		Where possible improve	reduce risk, where possible.		

Based on the above, the significance rating scale has been determined as follows:

- High**                      Of the highest order possible within the bounds of impacts which could occur. In the case of negative impacts, there would be no possible mitigation and / or remedial activity to offset the impact at the spatial or time scale for which it was predicted. In the case of positive impacts, there is no real alternative to achieving the benefit.
- Medium-High**           Impacts of a substantial order. In the case of negative impacts, mitigation and / or remedial activity would be feasible but difficult, expensive, time-consuming or some combination of these. In the case of positive impacts, other means of achieving this benefit would be feasible, but these would be more difficult, expensive, time-consuming or some combination of these.
- Medium**                    Impact would be real but not substantial within the bounds of those, which could occur. In the case of negative impacts, mitigation and / or remedial activity would be both feasible and fairly easily possible, in case of positive impacts; other means of achieving these benefits would be about equal in time, cost and effort.
- Low-Medium**            Impact would be of a low order and with little real effect. In the case of negative impacts, mitigation and / or remedial activity would be either easily achieved or little would be required, or both. In case of positive impacts alternative means for achieving this benefit would likely be easier, cheaper, more effective, less time-consuming, or some combination of these.
- Low**                         Impact would be negligible. In the case of negative impacts, almost no mitigation and or remedial activity would be needed, and any minor steps, which might be needed, would be easy, cheap and simple. In the case of positive impacts, alternative means would almost all likely be better, in one or a number of ways, than this means of achieving the benefit.
- Insignificant**            There would be a no impact at all – not even a very low impact on the system or any of its parts.



**vii) 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)

The prospecting area in which drilling sites can be moved to various positions in consultation with the landowners depending on sensitivity. However, the proposed prospecting area was identified as the preferred and only viable site alternative. In light of this, S1 was identified during the assessment phase of the environmental impact assessment, by the Applicant and project team due to the following:

- The mineral deposits being applied for are within Pella Domain Geology of the Namaqualand Metamorphic Province and predominately associated with pegmatite hosting zones; also, bright-red banded iron-formation bed (varying from massive to fine-grained specularite and/or euhedral magnetite crystals) exist.
- Pegmatites are associated with lithium-bearing minerals, including rare earth metals. Further, a large portion of the minerals in the area are silicates with varying amounts of sulphides, carbonates and borates. Minerals such as sphalerite (ZnS), galena (PbS), etc. are some of the common components of the sulphide minerals. Moreover, there are known mines and reported mineral occurrences of the minerals being applied for in the vicinity of the proposed area.

**PROJECT ASSOCIATED POSITIVE IMPACTS:**

- Work opportunities to local residents should prospecting be successful contributing to the socio-economic status of the area.
- Easy movement of equipment as processing progress
- Complete removal of equipment at closure of the prospecting area.
- Return of the prospecting area to landscape feature upon closure; and
- Diversification of the land use of the property.

**POTENTIAL NEGATIVE IMPACTS:**

***PLANNING AND SURFACE SAMPLING PHASE***

- Visual intrusion as a result of planning and surface sampling phase.
- Potential hydrocarbon contamination from leaks or spills;
- Potential impact on fauna within the footprint area.
- Dust nuisance as a result of the surface sampling.

- Noise nuisance as a result of surface sampling.
- Potential impact on the Safety of the area due to increased human concentration.
- Impact of the natural vegetation of the footprint.

### ***CLOSING OF DRILL HOLES AND LANDSCAPING UPON CLOSURE OF THE PROSPECTING AREA.***

- Uncapped boreholes left by the contractor.
- Erosion after rehabilitation.
- Impact of the natural vegetation of the footprint during decommissioning phase; and
- Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities.

#### **viii)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 mitigation 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)

The following mitigation measures are proposed to address/minimize the impact of the proposed activity on the surrounding environment:

### **VISUAL CHARACTERISTICS**

#### **Visual Mitigation:**

The risk of the proposed prospecting activities having a negative impact on the aesthetic quality of the surrounding environment can be reduced a lower risk through the implementation of the mitigation measures listed below.

- The applicant should however ensure that housekeeping is managed to standard, as this will mitigate the visual impacts during the operational phase of the prospecting activities.
- Upon closure the site will be rehabilitated to ensure that the visual impact on the aesthetic value of the area is kept to a minimum.
- The site will have a neat appearance and be kept in good condition at all times.

### **AIR AND NOISE QUALITY**

#### **Fugitive Dust Emission Mitigation:**

The risk of dust, generated from the proposed prospecting activities, having a negative impact on the surrounding environment can be reduced to a lower risk through the implementation of the following mitigation measures:

- The liberation of dust into the surrounding environment must be effectively controlled by the use of, inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).
- The site manager must ensure continuous assessment of the dust suppression equipment to confirm its effectiveness in addressing dust suppression.
- Speed on the access road must be limited to 40 km/h to prevent the generation of excess dust.
- Areas devoid of vegetation, which could act as a dust source, must be minimized.
- Weather conditions must be taken into consideration upon commencement of daily operations. Limiting operations during very windy periods would reduce airborne dust and resulting impacts.
- All dust generating activities shall comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM: AQA (Act 39 of 2004) and ASTM D1739 (SANS 1137:2012).
- Best practice measures shall be implemented during the stripping of topsoil (if required), drilling, and decommissioning and landscaping to minimize potential dust impacts.

#### **Noise Handling:**

The risk of noise, generated as a result of the proposed prospecting activity, having a negative impact on the surrounding environment can be reduced to being low through the implementation of the mitigation measures listed below:

- The prospecting right holder must ensure that employees and staff conduct themselves in an acceptable manner while on site.
- No loud music may be permitted at the prospecting area.
- All prospecting vehicles must be equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996 (Act No 93 of 1996).
- Best practice measures shall be implemented in order to minimize potential noise impacts.
- Noise generated on-site from all the proposed activities must comply with the Northern Cape Noise Control Regulations Provincial Notice 200/2013.

## **MINING AND BIODIVERSITY & GROUNDCOVER**

### **Management of Invasive Plant Species:**

The risk of weeds or invader plants invading the disturbed area can be reduced to being Low through the implementation of the mitigation measures listed below:

- An invasive plant species management plan (Appendix J) must be implemented at the site to ensure the management and control of all species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto). Weed/alien clearing must be done on an ongoing basis throughout the life of the prospecting activities.
- The project footprint and surroundings should be monitored during the initial construction period for alien invasive species, and annually for the lifetime of the fence and road and managed according to each species during the operational phase.
- Care should be taken to remove any biological material from equipment, personnel clothing,
- and gear before entering and when leaving the work site to prevent the spread and establishment of alien invasive species.
- Topsoil must be monitored bi-weekly by the designated Environmental Officer on site to detect the emergence of any alien invasive species.
- All topsoil stockpiles (if applicable) must be kept free of invasive plant species.
- Management must take responsibility to control declared invader or exotic species on the rehabilitated areas. The following control methods can be used:
  - The plants can be uprooted, felled, or cut off and can be destroyed completely.

## **FAUNA**

### **Protection of Fauna:**

The risk resulting from the proposed prospecting activity on terrestrial fauna of the footprint area as well as the surrounding environment, can be reduced to Low through the implementation of the mitigation measures listed below:

- The site manager must ensure no fauna is caught, killed, harmed, sold or played with.
- Workers must be instructed to report any animals that may be trapped in the working area.
- No snares may be set, or nests raided for eggs or young.
- All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.
- Any holes/deep excavations must be dug in a progressive manner and shouldn't be left open overnight. Should any holes remain open overnight they must be properly covered temporarily to ensure that no small fauna species fall in. Holes must be subsequently inspected for fauna prior to backfilling.

### **BIODIVERSITY AND ECOSYSTEMS ASSOCIATED WITH THE PROPOSED DEVELOPMENT**

- To minimize the impact on biodiversity and ecosystems during the proposed prospecting activities, several mitigation measures can be implemented:
- A thorough pre-activity ecological survey, including wetland and vegetation assessments, should be conducted by specialists to identify sensitive areas and designate them as no-go zones. This reduces the risk of habitat destruction and ensures that species of conservation concern are protected.
- Site layout alternatives include positioning drill sites away from ecologically sensitive zones such as wetlands, riparian areas, and endangered species habitats.
- Drilling activities should be restricted to already disturbed areas or low-sensitivity zones where feasible.
- Topsoil stripping and vegetation clearance should be minimized and confined to the designated 10m x 10m drill sites, with topsoil stockpiled for post-prospecting rehabilitation.

- Strict erosion control measures should be implemented to prevent sediment runoff into nearby water bodies.
- Existing roads should be used to avoid new road construction, reducing habitat fragmentation. Post-prospecting rehabilitation, including re-vegetation with native plant species and proper topsoil restoration, is critical to restore ecosystem functionality. Regular monitoring of drilling activities and rehabilitation efforts ensures compliance with environmental management plans.
- The level of risk to biodiversity and ecosystems is considered low to moderate, given the minimal spatial disturbance (less than 0.3 ha in total). However, without proper mitigation, the risks could escalate, including habitat degradation, loss of biodiversity, and disruption of ecological processes. By implementing these measures, the residual impacts are expected to be minimal and manageable.
- It is not known for how long the drilling rig will remain at each site, but it is recommended that an ECO should visit each at least twice during its operation. Ideally one such visit will be done when the site is first being established since that will also allow opportunity for the person to also check on the site which has just been left.
- All activities must make use of existing roads and tracks as far as practically and feasibly possible. No new roads are to be constructed under any circumstance. Parking of vehicles may only occur in already modified areas.
- A protected tree and a protected plant survey must be conducted by a suitably qualified ecologist and an estimate made of the number of protected trees which were lost during vegetation clearing. The replacement of the trees must be discussed with the department.
- A habitat rehabilitation plan must be compiled and implemented for all developed areas.
- Areas that have been disturbed but will not undergo development must be revegetated with indigenous vegetation.
- A fire management plan needs to be compiled and implemented to restrict the impact fire would have on the surrounding areas.
- Any holes must be dug in a progressive manner and shouldn't be left open overnight. Should any holes remain open overnight they must be properly covered temporarily to ensure that no small fauna species fall in. Holes must be subsequently inspected for fauna prior to backfilling.

## HYDROLOGY

To mitigate potential hydrological impacts during the prospecting activities, the following measures can be implemented:

- Establish buffer zones around wetlands, rivers, and other sensitive water resources identified during the pre-drilling walk-through by ecological specialists.
- Avoid drilling during rainy seasons to minimize erosion and surface water contamination. Install sediment traps and silt fences around drill sites to prevent runoff from contaminating nearby water bodies.
- Seal boreholes after drilling to prevent groundwater contamination or alteration of aquifer systems. Conduct groundwater monitoring to detect potential changes in water quality or levels.
- Ensure all drilling fluids, oils, and other contaminants are properly contained and disposed of off-site to avoid polluting surface and groundwater resources.
- Use existing access roads to avoid creating new pathways that could alter surface water flow.
- Relocate drill sites to areas far from wetlands, streams, or other hydrologically sensitive zones.
- Adjust the layout to ensure the least interaction with water features and to avoid high-sensitivity zones.
- The overall hydrological risk is considered **low to moderate**, given the limited disturbance (less than 0.3 hectares) and the non-permanent nature of the activity. With proper implementation of the mitigation measures, the risk of significant impacts to water resources can be effectively minimized.
- Any roads or tracks that were prepared or used for access to the site must be returned to their prior state and their condition must be approved by the landowner.

## GENERAL

### Waste Management:

The risk of uncontrolled waste generation having a negative impact on the surrounding environment can be reduced to being Low through the implementation of the mitigation measures listed below:

- Provision must be made for proper retention of all garbage, domestic wastes, and drilling wastes. Bins with lids or skips must be provided and these must be

emptied at an approved disposal site. No refuse of any sort may be buried or burned at the site.

- Fuels and oils must be held in leak-free containers and must be kept on drip trays when not in use.
- Waste oils and the like, including items such as used oil filters and oil-soaked paper or rags, must be retained in sealed containers and be kept on drip trays.
- Vehicles and machines must be refuelled or serviced over drip trays. Any soil contaminated by fuel or oil spills must be collected and be held in a suitable sealed container prior to removal to an approved disposal site. A hazmat kit of appropriate capacity must be kept on the site at all times.
- On completion of drilling operations at each site, all materials, including wastes or litter, must be removed for re-use at another site or for disposal as may be relevant. The site must be cleaned and tidied and its condition must be approved by the landowner before the contractor may leave the site.
- When and if applicable the maintenance/service of the drill rig will be performed on site within the drilling area and in line with approved impact management measures (i.e., hydrocarbon spill management, etc.).
- Ablution facilities must be provided in the form of a chemical toilet. The chemical toilet must be placed outside the 1:100-year floodline of any open water source and must be serviced at least once every two weeks for the duration of the prospecting activities.
- The use of any temporary, chemical toilet facilities may not cause any pollution to water sources or pose a health hazard. In addition, no form of secondary pollution should arise from the disposal of refuse or sewage from the temporary, chemical toilets. Any pollution problems arising from the above are to be addressed immediately by the prospecting right holder.
- Site management must ensure drip trays are cleaned after each use. No dirty drip trays may be used on site.
- A spill kit must be available on-site which can be operated by trained employees for the *ad hoc* remediation of minor chemical and hydrocarbon spillages.
- Any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.
- Should spillage occur, such as oil or diesel leaking from a burst pipe, the contaminated soil must, within the first hour of occurrence, be collected in a



suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility. Proof must be filed.

- No waste may be buried or burned on the site.
- No chemicals or hazardous materials may be stored at the prospecting area.
- It is important that any significant spillage of chemicals, fuels etc. during the lifespan of the prospecting activities is reported to the Department of Water and Sanitation and other relevant authorities.
- All machinery must be parked at the stockpile area with drip trays placed underneath stationary vehicles.
- Cement mixing may not be performed on the ground. It is recommended that only closed side drum or pan type concrete mixers be utilised. Any spills must be immediately contained and isolated from the natural environment, before being removed from site.

#### **Management of heritage/paleontological finds**

- Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, this should be conducted prior to the commencement of prospecting activities.
- Drill sites must be kept as close as possible to existing roads in order to minimise the impact on the landscape.
- Focal points on the landscape like rocky outcrops or pans must be avoided as far as possible as these areas could be sensitive from a heritage point of view.
- Monitoring of the project area by the ECO during the exploration phase for heritage chance finds, and if chance finds are encountered to implement the Chance Find Procedure for the project.

#### **Management of Health and Safety Risks:**

The following mitigation measures are proposed to minimise the potential health and safety impacts:

- Adequate ablution facilities and water for human consumption must daily be available on site.
- Workers must have access to the correct personal protection equipment (PPE) as required by law.
- All operations must comply with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).
- No trespassing on private property outside the approved area will be allowed.

**ix) Motivation where no alternative sites were considered.**

### **Identified Alternatives:**

The property on which, or location where, it is proposed to undertake the activity - Site Alternative 1 (Preferred and Only Site Alternative):

Site Alternative 1 was identified as the preferred and only viable site alternative based on the following: The Prospecting area with a footprint of approximately 83 954 ha on farm 622 within the Namaqualand Magisterial District in the Northern Cape Province (hereafter referred to as the application property).

No specific alternative sites were considered because the prospecting activities are exploratory and depend on geological features that are inherently site-specific. The flexibility to move prospecting sites based on sensitivity and accessibility considerations eliminates the need for pre-determined alternative locations. The project will adapt to findings from non-invasive studies and specialist walk-through assessments to avoid sensitive areas.

As mentioned in the prospecting work programme at this stage of the project, it is impossible to define the exact locations of drill sites or number of drillholes to be dug. However, the detailed drilling spacing will be planned to allow the defining of an Inferred Mineral Resources as per the SAMREC code. Should there be a need to conduct an extra exploration work, which is not indicated herein, in order to clearly define Mineral Resource Category, Department of Mineral Resources and Energy will be provided with an addendum in respect to the Prospecting Work Programme.

Availability of the mineral resource will only be determined should prospecting the prospecting right be granted and drilling can take place.

### **Type of Activity to Be Undertaken**

The proposed activity involves both non-invasive and invasive prospecting methods, including borehole drilling to retrieve geological core samples. These activities are limited in scope and do not require bulk sampling or permanent infrastructure. Their design minimizes environmental disturbance and prioritizes adaptability to ensure protection of sensitive areas.

### **Design and Layout of the Activity**

The activity layout is intentionally dynamic and allows for adjustments to avoid ecologically sensitive areas identified through specialist studies. The small-scale

footprint of each drill site (10m x 10m) and the minimal cumulative disturbance (less than 0.3 ha) reduce the need for pre-determined alternative layouts. Site establishment and layout planning are conducted in collaboration with landowners and specialists, ensuring site-specific adjustments as necessary.

### **Technology to Be Used in the Activity**

The technologies employed—Reverse Circulation (RC) and Diamond (Core) drilling—are industry-standard methods for minimizing environmental impact. These techniques are precise, reducing unnecessary disturbance, and are supported by measures like stockpiling topsoil and using existing roads for transportation. There are no viable technological alternatives that would further reduce impacts while maintaining the activity's objectives.

### **No-Go Alternative**

The no-go alternative would result in the cessation of prospecting activities, which would forgo the opportunity to assess mineral potential in the area. This would negatively impact economic opportunities such as job creation and revenue generation while having no significant added benefit to environmental conservation, given the proposed project's minimal and manageable impacts.

The no-go alternative was not deemed to be the preferred alternative as:

The applicant will not be able to prospect for any possible mineral resource.

The application, if approved, would allow the applicant to determine the available mineral as well as provide employment opportunities to local employees. Should the no-go alternative be followed, these opportunities will be lost to the applicant, potential employees and clients; and

The applicant will not be able to diversify the income of the property.

Not proceeding with the proposed operation will entail that a mineral which if found will contribute towards the local and provincial social and economic structures of the area, will not be mined, and that this opportunity will be lost.

In conclusion, the combination of minimal disturbance, adaptive layout planning, and careful technology selection renders alternative site consideration unnecessary.

**x) Statement motivating the alternative development location within the overall site.**

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

Site Alternative 1 was identified during the assessment phase of the environmental impact assessment as the preferred and only site alternative. Prospecting sites will be moved away from/to various area depending on sensitivity and accessibility. The following matters contributed to the identification of the preferred development footprint:

- 1. Topography** – The prospecting activities will not affect the topography of the receiving environment, nor will prospecting have any residual affects should all areas be rehabilitated. The selected development footprint ensures that drill sites are positioned in areas with relatively flat or gently sloping terrain to minimize erosion and facilitate access. This reduces the need for extensive land preparation, further lowering the environmental impact.
- 2. Visual Characteristics** – The viewshed analysis showed that the visual impact of the proposed prospecting operation will be of low significance. The small scale of the proposed operation contributes to the low visual significance. The prospecting activities are small-scale and temporary, with minimal visual disruption. The use of existing roads and the compact size of each drill site (10m x 10m) ensures the visual character of the landscape is preserved, particularly in scenic or tourism-sensitive areas. Should the Applicant successfully rehabilitate the prospecting areas (upon closure), no residual visual impact is expected upon closure of the prospecting activities.
- 3. Air and Noise Quality** – The proposed activity will contribute the emissions of drilling rigs and a field vehicle to the receiving environment for the duration of the operational phase. The limited size and number of active drill sites at any given time (maximum of four) minimize emissions and noise pollution. The temporary nature of activities and adherence to operational guidelines ensure air and noise quality remain within acceptable limits, reducing disturbances to local communities. Should the prospecting holder implement the mitigation measures proposed in the BAR and the EMPr the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use. The potential impact on the noise ambiance of the receiving environment is expected to be of low significance.

- 4. Geology and Soil** – As per the Prospecting Work Programme (Appendix M), foliated granites, granitic orthogneisses and late- to post-tectonic granites are extensively represented in all the metamorphic zones, including the high-T granulite-facies (aged 1033 Ma, 1200 Ma, 1060 Ma and 1030 Ma). Heat produced during radioactive decay in these rocks was largely responsible for their metamorphic conditions, especially where granulite and charnockite formation was promoted by the circulation of U–Th–REE-rich, H<sub>2</sub>O-deficient fluids and melts. Hosts granulite-facies granitic plutons with the highest concentrations of heat-producing elements (K, U and Th). There are also numerous late-stage smaller intrusions of U-rich leucogranite that may constitute potential resources of uranium. The prospecting activities will entail core samples and testing; no bulk sampling will be done. The footprint is designed to avoid areas with highly sensitive or unstable soils. Topsoil will be stripped, stockpiled, and preserved for site rehabilitation post-prospecting, ensuring minimal and reversible impact on soil health and structure.
- 5. Hydrology** – To prevent water resource contamination, sites are planned to avoid proximity to wetlands, rivers, or drainage areas. Specialists will conduct walk-through assessments to identify hydrologically sensitive zones and implement buffer zones as no-go areas, ensuring sustainable water management if applicable.
- 6. Mining, Biodiversity and Groundcover** – Biodiversity-sensitive areas, such as habitats of endangered species, are avoided through adaptive site planning based on specialist inputs. Disturbance to groundcover is minimized through the compact drill sites and restricted vegetation clearance, with strict measures for rehabilitation post-activity.
- 7. Fauna** - Various small mammals and reptiles occur on the property. The fauna at the site will not be impacted by the proposed prospecting activity as they will be able to move away or through the site, without being harmed. Workers should be educated and managed to ensure that no fauna at the site is harmed. The development footprint is designed to avoid critical habitats for fauna. Specialist assessments during the EIA and pre-drilling walk-throughs will identify and protect key species' habitats by designating them as no-go zones. Temporary activity ensures minimal disruption to wildlife movement and behaviour.

With this said, the drilling sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner /

landowners. Should this prospecting right be granted farm owners will be consulted prior to commencement of any activities to ensure that safety of animals and workers.

- 8. Cultural and Heritage Environment** - Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

All prospecting sites will be pre-screened for cultural and heritage significance. Should any heritage resources be identified during the assessment, these areas will be excluded from development. This ensures compliance with heritage preservation laws and safeguards cultural assets.

The proposed layout accommodates environmental and social concerns while meeting project goals. The flexible site selection and adaptive planning approach ensure that sensitive areas are avoided, reducing environmental and societal impacts to the greatest extent possible.

- i) 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 were 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)

During the impact assessment process, the following potential impacts were identified of each main activity in each phase. An initial significance rating (listed under *v) Impacts and Risks Identified*) was determined for each potential impact should the mitigation measures proposed in this document not be implemented on-site. The impact assessment process then continued in identifying mitigation measures to address the impact that the proposed prospecting activity may have on the surrounding environment.

The significance rating was again determined for each impact using the methodology as explained under *vi) Methodology Used in Determining and Ranking the Significance*. The impact ratings listed below was determined for each impact **after** bringing the proposed mitigation measures into consideration and therefore represents the final layout/activity proposal.

### PLANNING AND SURFACE SAMPLING PHASE

#### Visual intrusion as a result of surface sampling phase

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: None</b>					
2	3	1	2	2	2	2	<b>4</b>				

#### Potential hydrocarbon contamination from leaks or spills

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
2	2	1	1.6	2	3	2.5	<b>4</b>				

#### Potential impact on fauna within the footprint area

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
2	2	1	1.6	2	3	2.5	<b>4</b>				

#### Dust nuisance as a result of surface sampling.

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	1	1	1	1	2	1.5	<b>1.5</b>				

#### Noise nuisance as a result of surface sampling

						Significance					
Severity	Duration	Extent	Consequence	Probability	Frequency	Likelihood	Low	Low-Medium	Medium	Medium-High	High
							1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Partial</b>					
1	3	1	1.6	1	2	1.5	<b>2.4</b>				



Potential impact on the Safety of the area due to increased human concentration.

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
2	3	1	2	2	2	2	4				

Impact of the natural vegetation of the footprint.

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	3	1	1.6	1	2	1.5	2.4				

Deterioration of the access road to the prospecting area

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
2	3	1	2	2	2	2	4				

**CLOSING OF DRILL HOLES AND LANDSCAPING UPON CLOSURE OF THE PROSPECTING AREA**

Uncapped boreholes left by the contractor.

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	4	1	2	2	1	1.5	3				

Erosion after rehabilitation

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	3	1	1.6	1	2	1.5	2.4				

Impact of the natural vegetation of the footprint during decommissioning phase

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	4	1	2	2	1	1.5	<b>3</b>				

Potential impact associated with litter/hydrocarbon spills left due to decommissioning activities.

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Low Medium</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
2	4	1	2.3	3	2	2	<b>4.6</b>				

Return of the prospecting area to agricultural use upon closure (**Positive Impact**)

			Consequence			Likelihood	Significance				
Severity	Duration	Extent		Probability	Frequency		Low	Low-Medium	Medium	Medium-High	High
						1 - 4.9	5 - 9.9	10 - 14.9	15 - 19.9	20 - 25	
<b>Rating: Medium-high</b>			<b>Site Alternative 1 &amp; Layout Alternative</b>			<b>Degree of Mitigation: Full</b>					
1	5	5	3.7	5	5	5	<b>18.5</b>				

### j) 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).

Table 29: Assessment of each identified potentially significant impact and risk.

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	SIGNIFICANCE	MITIGATION TYPE	SIGNIFICANCE
Whether listed or not listed. (E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	(E.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, air pollution, etc...etc...etc.)		In which impact is anticipated. (E.g. Construction, commissioning, operational Decommissioning closure, post closure.)	If not mitigated.	(modify, remedy, control, or stop) through (e.g. noise control measures, storm water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc.)  E.g. Modify through alternative method. Control through noise control. Control through management and monitoring through rehabilitation.	If mitigated.
<ul style="list-style-type: none"> <li>Demarcation of site with visible beacons.</li> </ul>	<ul style="list-style-type: none"> <li>No impact could be identified other than the beacons being outside the boundaries of the approved prospecting area.</li> </ul>	N/A	Planning and surface sampling phase	N/A	Control through management and monitoring.	N/A
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Visual intrusion as a result of planning and surface sampling phase</li> <li>Uncapped boreholes left by the contractor</li> </ul>	The visual impact may affect the aesthetics of the landscape.	Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low</li> <li>Low Medium</li> </ul>	<u>Control:</u> Implementing proper housekeeping.	<ul style="list-style-type: none"> <li>Low</li> <li>Low</li> </ul>

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	SIGNIFICANCE	MITIGATION TYPE	SIGNIFICANCE
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on fauna within the footprint area</li> <li>Impact of the natural vegetation of the footprint.</li> <li>Impact of the natural vegetation of the footprint during decommissioning phase</li> <li>Uncapped boreholes left by the contractor</li> </ul>	This will impact on the biodiversity of the receiving environment.	Operational and Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Medium</li> <li>Low Medium</li> <li>Low Medium</li> <li>Low Medium</li> </ul>	Control: Implementing good management practices.	<ul style="list-style-type: none"> <li>Low</li> <li>Low</li> <li>Low</li> <li>Low</li> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Dust nuisance as a result of the planning and surface sampling phase.</li> </ul>	Increased dust generation will impact on the air quality of the receiving environment.	Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low</li> </ul>	Control: Dust suppression methods and proper housekeeping.	<ul style="list-style-type: none"> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Noise nuisance as a result of surface sampling;.</li> </ul>	Should noise levels become excessive it may have an impact on the noise ambiance of the receiving environment.	Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low</li> </ul>	Control: Noise suppression methods and proper housekeeping.	<ul style="list-style-type: none"> <li>Low</li> </ul>

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	SIGNIFICANCE	MITIGATION TYPE	SIGNIFICANCE
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Potential hydrocarbon contamination from leaks or spills</li> <li>Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities;</li> </ul>	Contamination of the footprint area will negatively impact the soil, surface runoff and potentially the groundwater. It will also incur additional costs to the prospecting right holder.	Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Medium</li> <li>Low - Medium</li> </ul>	<u>Control &amp; Remedy:</u> Proper housekeeping and implementation of an emergency response plan and waste management plan.	<ul style="list-style-type: none"> <li>Low</li> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Deterioration of the access road to the prospecting area.</li> </ul>	Collapse of the road infrastructure will affect the landowner.	Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low Medium</li> </ul>	<u>Control &amp; Remedy:</u> Maintaining the access road for the duration of the operational phase, as well as leaving it in a representative or better condition than prior to prospecting.	<ul style="list-style-type: none"> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on the Safety of the area due to increased human concentration</li> </ul>	Trespassing will negatively affect the landowner due to possible loss of fauna.	Planning and surface sampling, Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low Medium</li> </ul>	<u>Control:</u> Proper site management.	<ul style="list-style-type: none"> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on areas/infrastructure of heritage or cultural concern</li> </ul>	This could impact on the cultural and heritage legacy of the receiving environment.	Operational /Drilling Phase	<ul style="list-style-type: none"> <li>Low - Medium</li> </ul>	<u>Control &amp; Stop:</u> Implementing good management practices	<ul style="list-style-type: none"> <li>Low</li> </ul>
<ul style="list-style-type: none"> <li>Closing of drill holes and landscaping upon closure of the prospecting area.</li> </ul>	<ul style="list-style-type: none"> <li>Erosion after rehabilitation</li> </ul>	Erosion will have an impact on aquatic systems in the area as well as borrowing fauna.	Operational and Decommissioning Phase	<ul style="list-style-type: none"> <li>Low</li> </ul>	<u>Control &amp; Remedy:</u> Proper housekeeping.	<ul style="list-style-type: none"> <li>Low</li> </ul>

The supporting Impact Assessment conducted by the EAP must be attached as an appendix, marked Appendix F

**k) Summary of specialist reports.**

(This summary must be completed if any specialist reports informed the impact assessment and final site layout process and must be in the following tabular form):

*Table 30: Summary of specialist reports*

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT  (Mark with X if applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED
<p>The following specialist studies were identified in the screening report; however, none were conducted to date due to the minimal and temporary nature of the proposed prospecting activities, as detailed below:</p> <ul style="list-style-type: none"> <li>• Agricultural Impact Assessment.</li> <li>• Archaeological and Cultural Heritage Impact Assessment.</li> <li>• Palaeontology Impact Assessment.</li> <li>• Terrestrial Biodiversity Impact Assessment.</li> <li>• Aquatic Biodiversity Impact Assessment.</li> <li>• Hydrology Assessment.</li> <li>• Noise Impact Assessment.</li> <li>• Radioactivity Impact Assessment.</li> <li>• Traffic Impact Assessment.</li> <li>• Geotechnical Assessment.</li> <li>• Socio-economic Assessment.</li> <li>• Plant Species Assessment; and</li> </ul>			

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT  (Mark with X if applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED
<ul style="list-style-type: none"> <li>Animal Species Assessment.</li> </ul>			
	<ul style="list-style-type: none"> <li>Agricultural Impact Assessment (AIA):</li> </ul> <p>An agricultural impact is a temporary or permanent change to the future agricultural production potential of land. The significance of the agricultural impact is directly proportional to the extent of the change in production potential, which is a function of:</p> <ol style="list-style-type: none"> <li>the length of time for which the change in production potential lasts</li> <li>the total footprint of land whose production potential will be changed.</li> <li>the baseline production potential (particularly cropping potential) of that land</li> </ol> <p>The proposed activities involve minimal surface disturbance (less than 0.3 hectares for the entire project) and do not require bulk sampling or permanent infrastructure. Topsoil stripping will be limited to small, designated drill sites (10m x 10m), and the topsoil will be stockpiled for rehabilitation. The temporary nature of the disturbance ensures that agricultural productivity will not be significantly affected, negating the need for a detailed assessment.</p>		<ul style="list-style-type: none"> <li>Archaeological and Cultural Heritage Impact Assessment (HIA) &amp; Paleontology Impact Assessment (PIA):</li> </ul> <p>As per the screening report, the area has a low heritage impact and according to the SAHRA Paleontological sensitivity map the study area extend over an area of insignificant/zero (grey) concern.</p>

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT  (Mark with X if applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED
<p>Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.</p> <p>The project area will undergo a walk-through by specialists before invasive activities commence to identify sensitive sites, including potential archaeological and cultural heritage areas. The ability to adjust drill sites ensures that such sites can be avoided, reducing the need for a standalone assessment.</p> <ul style="list-style-type: none"> <li>• Terrestrial Biodiversity Impact Assessment (TBIA) &amp; Plant Species Assessment (PSA) &amp; Animal Species Assessment (ASA):</li> </ul> <p>The prospecting activities involve small-scale vegetation clearance and temporary site establishment. Sensitive areas, including ecologically significant zones, will be identified during the pre-activity specialist walk-through and designated as no-go zones. Adjusting drill sites based on ecological sensitivity reduces the necessity for a detailed biodiversity study at this stage.</p> <p>With this said, the drilling sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners. Should this prospecting right be granted farm owners will be consulted prior to commencement of any activities to ensure that safety of animals and workers.</p> <ul style="list-style-type: none"> <li>• Animal Species Assessment (ASA):</li> </ul> <p>Potential impacts on animal species are mitigated through careful site selection during the specialist walk-through. By avoiding sensitive habitats, the need for a specific animal species assessment is minimized.</p>			



LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT  (Mark with X if applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED
	<p>With this said, the drilling sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners. Should this prospecting right be granted farm owners will be consulted prior to commencement of any activities to ensure that safety of animals and workers.</p> <ul style="list-style-type: none"> <li>Plant Species Assessment (PSA):</li> </ul> <p>Sensitive plant species will be identified during the pre-activity walk-through by ecological specialists. Drill sites will be adjusted to avoid these areas, reducing the need for a detailed plant species study.</p> <ul style="list-style-type: none"> <li>Aquatic Biodiversity Impact Assessment (ABIA) &amp; Hydrology Assessment (HA):</li> </ul> <p>Drilling locations will avoid wetlands and watercourses, as identified during the specialist walk-through. The limited scale of disturbance and adherence to buffer zones ensure minimal impact on aquatic ecosystems, eliminating the need for a separate aquatic assessment. Existing roads will be used, and strict erosion and sediment control measures will be implemented to protect nearby water resources. No permanent infrastructure or activities likely to alter surface or groundwater flows are planned, making a hydrology assessment unnecessary.</p> <ul style="list-style-type: none"> <li>Noise Impact Assessment (NIA):</li> </ul> <p>Noise generation will be limited to operational hours and confined to small, localized drilling areas. Given the short-term nature of the prospecting activities and the lack of nearby noise-sensitive receptors, the impacts are expected to be negligible, reducing the need for an assessment.</p>		

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT  (Mark with X if applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED
	<ul style="list-style-type: none"> <li>• Radioactivity Impact Assessment  The activities involve drilling for geological core samples without bulk sampling, making significant radioactivity risks unlikely. Any unexpected findings will be managed using established protocols, so no dedicated study is required.</li> <li>• Traffic Impact Assessment (TIA):  The transport of drill cores will be conducted using standard single cab bakkies on existing roads, generating minimal additional traffic. The temporary nature of the activity and the small number of vehicles involved ensure no significant impact on traffic flows, negating the need for an assessment, should the applicant implement the mitigation measures to be proposed in the EMPr.</li> <li>• Geotechnical Assessment:  The project does not involve construction or permanent infrastructure requiring a geotechnical foundation analysis. The localized nature of the disturbance limits the relevance of a geotechnical study.</li> <li>• Socio-economic Assessment (SEA):  The activities are short-term and localized, with minimal disruption to surrounding communities. Discussions with landowners and adherence to access agreements ensure that socio-economic impacts remain negligible, obviating the need for an assessment.</li> </ul>		

## **I) Environmental impact statement**

### **i) Summary of the key findings of the environmental impact assessment.**

The environmental impact assessment concludes that with proper mitigation measures, the proposed project's impacts on the environment and surrounding communities are minimal and manageable. The adaptive layout and operational planning further enhance the project's sustainability.

The key findings of the environmental impact assessment entail the following:

#### **Project Description**

The proposed prospecting footprint applied for is 83 954 ha on farm 622 for Uranium Ore in the Namaqualand Magisterial District in the Northern Cape Province.

The proposed activity will make use of non-invasive as well as invasive prospecting activities that will include borehole drilling to retrieve geological core samples. No bulk sampling will be done.

The project involves non-invasive and invasive prospecting activities to extract geological core samples through Reverse Circulation (RC) and Diamond (Core) drilling methods. Each drill site will occupy 10m x 10m, with a maximum of four active sites at any given time. The cumulative disturbance over the project's life will be less than 0.3 hectares. Activities will avoid sensitive areas and require no bulk sampling, permanent infrastructure, or road construction. Specialists will conduct walk-throughs to identify no-go zones, ensuring environmental impacts are minimized.

#### **Topography:**

The prospecting area includes relatively flat to gently sloping terrain, reducing erosion risks and facilitating access. The small-scale and temporary nature of the project minimizes topographical alterations.

#### **Visual Characteristics:**

The topography of the study area consists of level to slightly undulating sedimentary surfaces between rocky granitic hills and mountains, such as wide plains and broad valleys with dry channels of intermittent water courses. The elevation loss from the north-east corner to the south-west corner of the proposed footprint is 1111 m over 55 km.

**Air and Noise Quality:**

The proposed activity will contribute the emissions of a drilling rig and a field vehicle to the receiving environment for the duration of the operational phase. Air and noise emissions from prospecting activities are minimal due to the limited number of active drill sites and temporary nature of the operations. Compliance with air quality and noise standards will ensure minimal disturbance to local communities and the environment. Should the prospecting holder implement the mitigation measures proposed in this document and the EMPR the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use. The potential impact on the noise ambiance of the receiving environment is expected to be of low significance.

**Geology and Soil:**

Soil disturbance is limited to the small footprints of the drill sites. Topsoil will be carefully stripped, stockpiled, and used for rehabilitation after prospecting. Measures will ensure soil health is preserved, and erosion risks are managed effectively.

The proposed prospecting area consists of foliated granites, granitic orthogneisses and late- to post-tectonic granites are extensively represented in all the metamorphic zones, including the high-T granulite-facies (aged 1033 Ma, 1200 Ma, 1060 Ma and 1030 Ma). Heat produced during radioactive decay in these rocks was largely responsible for their metamorphic conditions, especially where granulite and charnockite formation was promoted by the circulation of U–Th–REE-rich, H<sub>2</sub>O-deficient fluids and melts. Hosts granulite-facies granitic plutons with the highest concentrations of heat-producing elements (K, U and Th). There are also numerous late-stage smaller intrusions of U-rich leucogranite that may constitute potential resources of uranium.

**Hydrology:**

Prospecting sites are planned to avoid wetlands, rivers, and drainage areas. Hydrologically sensitive zones will be identified during specialist walk-throughs, with buffer zones implemented to prevent contamination and preserve water quality.

**Mining, Biodiversity and Groundcover:**

The prospecting activities will avoid biodiversity-sensitive areas identified during specialist assessments. Vegetation clearance will be minimal and confined to drill sites.

Rehabilitating sites after prospecting ensures the restoration of groundcover and minimal long-term impacts on ecosystems.

### **Fauna:**

Various mammals and reptiles are likely to occur on the property. The fauna at the site will not be impacted by the proposed prospecting activity as they will be able to move away or through the site, without being harmed. Workers should be educated and managed to ensure that no fauna at the site is harmed. The project is expected to have a negligible impact in this regard as prospecting activities will be done by drilling prospecting boreholes in phases over the duration of the prospecting period. Prior to moving to the next drill block these sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners. Should this prospecting right be granted farm owners will be consulted prior to commencement of any activities to ensure that safety of animals and workers.

Critical habitats for fauna will be avoided, with specialist walk-throughs ensuring that key areas are designated as no-go zones. The temporary and small-scale nature of activities reduces disturbances to wildlife movement and behaviour.

### **Cultural, Heritage and Palaeontological Environment:**

As per the screening report, the area has a majority low heritage impact with small section that show Very High sensitivity (these areas are to be completely avoided) but has a medium palaeontology sensitivity and according to the SAHRA Paleontological sensitivity map the study area extend over an area of insignificant/zero (grey) concern. Once the drill sites have been confirmed these areas have to be subjected to a heritage walk through, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

#### **i) Final Site Map**

Provide a map at an appropriate scale which superimposes the proposed overall activity and its associated structure and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. Attach as Appendix A.

See the map indicating prospecting site activities attached as Appendix C.

**ii) Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;**

**PROJECT ASSOCIATED POSITIVE IMPACTS:**

- Work opportunities to local residents should prospecting be successful contributing to the socio-economic status of the area;
- Easy movement of equipment as processing progress;
- Complete removal of equipment at closure of the prospecting area;
- Return of the prospecting area to landscape feature upon closure; and
- Diversification of the land use of the property.

**POTENTIAL NEGATIVE IMPACTS:**

***PLANNING AND SURFACE SAMPLING PHASE***

- Visual intrusion as a result of planning and surface sampling phase;
- Potential hydrocarbon contamination from leaks or spills;
- Potential impact on fauna within the footprint area;
- Dust nuisance as a result of the surface sampling;
- Noise nuisance as a result of surface sampling;
- Potential impact on the Safety of the area due to increased human concentration;
- Impact of the natural vegetation of the footprint;
- Deterioration of the access road to the prospecting area;

***CLOSING OF DRILL HOLES AND LANDSCAPING UPON CLOSURE OF THE PROSPECTING AREA.***

- Uncapped boreholes left by the contractor;
- Erosion after rehabilitation;
- Impact of the natural vegetation of the footprint during decommissioning phase; and
- Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities;

The negative impacts associated with the project that was deemed to have a Low-Medium or higher significance includes:

No negative impacts, after mitigations measures, were identified to have a Low-Medium or higher significance.

### m) Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr;

Based on the assessment and where applicable the recommendations from specialist reports, 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 condition of authorisation.

Table 31: Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
<p><b>VISUAL CHARACTERISTICS</b></p> <p>Mitigating the visual impact.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Contain prospecting to the boundaries of the authorised area.</li> <li>• Ensure that the site have a neat appearance and is kept in good condition at all times.</li> <li>• Limit vegetation removal, and only strip topsoil immediately prior to the use of a specific area.</li> <li>• Rehabilitate and landscape every borehole site to address any residual impact.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimise the impact of the proposed project on the visual characteristics of the receiving environment during the operational phase, and ensure no residual impact remains after closure.</li> </ul>
<p><b>AIR QUALITY</b></p> <p>Dust management</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Control the liberation of dust into the surrounding environment by the use of; inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).</li> <li>• Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.</li> <li>• Limit speed on the access roads to 40 km/h to prevent the generation of excess dust.</li> <li>• Minimise areas devoid of vegetation.</li> <li>• Take weather conditions into consideration upon commencement of daily operations. Limit operations during very windy periods to reduce airborne dust and resulting impacts.</li> <li>• Ensure dust generating activities comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM: AQA, 2004 and ASTM D1739 (SANS 1137:2012).</li> </ul>	<ul style="list-style-type: none"> <li>• Dust prevention measures are applied to minimise the generation of dust.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
		<ul style="list-style-type: none"> <li>Implement best practice measures during the operation to minimize potential dust impacts.</li> </ul>	
<p><b>NOISE AMBIANCE</b></p> <p>Noise mitigation.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>Ensure that employees and staff conduct themselves in an acceptable manner while on site.</li> <li>No loud music may be permitted at the prospecting area.</li> <li>Ensure that all project related vehicles are equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996.</li> <li>Implement best practice measures to minimise potential noise impacts.</li> <li>Noise generated on-site from all the proposed activities must comply with the Northern Cape Noise Control Regulations Provincial Notice 200/2013</li> </ul>	<ul style="list-style-type: none"> <li>Prevent unnecessary noise to the environment by ensuring that noise from development activity is mitigated.</li> </ul>
<p><b>GEOLOGY AND SOIL</b></p> <p>Topsoil Management</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<p><b><u>Topsoil Management:</u></b></p> <p>As mentioned earlier, the applicant will not remove any topsoil due to the fast mobility of the drill rig. The boreholes will be capped with sand material from around the boreholes, and the area rehabilitated as they move to the next borehole. The following standard mitigation measure will be adhered to in the event of any possible removal of topsoil:</p> <ul style="list-style-type: none"> <li>Carefully manage and conserve the topsoil throughout the prospecting and rehabilitation process.</li> <li>Ensure topsoil stripping, stockpiling, and re-spreading is done in a systematic way.</li> <li>Place topsoil heaps on a levelled area within the prospecting footprint area. Do not stockpile topsoil in undisturbed areas.</li> <li>Protect topsoil stockpiles against losses by water and wind erosion. Position stockpiles so as not to be vulnerable to erosion by wind and water. Establishment of plants on the stockpiles will help prevent erosion.</li> <li>Spread the topsoil evenly over the rehabilitated area, to a depth of 300 mm, upon closure of the site.</li> </ul>	<ul style="list-style-type: none"> <li>Wastes are appropriately handled and safely disposed of at a recognised waste facility.</li> </ul>



MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
		<ul style="list-style-type: none"> <li>• Strive to re-instate topsoil at a time of the year when vegetation cover can be established as quickly as possible afterwards, to that erosion of returned topsoil is minimized. The best time of year is at the end of the rainy season.</li> <li>• Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.</li> </ul>	
<p><b>HYDROLOGY</b></p> <p>Storm water management.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPR.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Conduct activity in terms of the Best Practice Guidelines for prospecting as developed by DWS.</li> <li>• No drilling should be undertaken at times when rain has fallen, and the pans are holding water. This measure is recommended to both minimise the possibility of contamination of the surface and ground water, and to minimise disturbance of the important bird populations around the pans.</li> <li>• The access to the site must be planned together with the relevant landowner and be approved by the landowner.</li> <li>• The landowner may stop operations at any site if the conditions of the approval are ignored or otherwise bypassed.</li> <li>• Access roads and tracks must make use as far as is possible of existing farm roads and tracks. Ideally, the routes will be approved and documented by an Environmental Control Officer (ECO).</li> <li>• To the greatest possible extent, the access roads and tracks must avoid passing through watercourses or pans or other environmentally sensitive areas. Such areas could include known home ranges of species of especial biodiversity conservation concern.</li> <li>• Preparation of the drilling site must avoid damage to the vegetation as far as is possible.</li> <li>• The size of the drilling sites must be restricted to a practical minimum and must be approved by the landowner and ECO.</li> </ul>	<ul style="list-style-type: none"> <li>• Impact to the environment caused by storm water discharge is avoided.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
		<ul style="list-style-type: none"> <li>• If needed, a lay-down area for pipes may be established close by the drilling site but its boundary must also be demarcated.</li> <li>• Since the drill operators may live on the site while working there, provision must be made for ablution and toilet facilities. Grey water may be disposed of onsite but chemical toilets must be provided and be properly serviced. Pit latrines may not be used.</li> <li>• Any roads or tracks that were prepared or used for access to the site must be returned to their prior state and their condition must be approved by the landowner.</li> </ul>	
<p><b>GROUNDCOVER</b></p> <p>Mitigating invader plants.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPR.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Implement an invasive plant species management plan (Appendix J) to control all invasive plant species on site in terms of NEM:BA, 2004 and CARA, 1983.</li> <li>• Keep all topsoil (if applicable) free of invasive plant species.</li> <li>• Control declared invader or exotic species on the rehabilitated areas.</li> <li>• Construction activities, movement of personnel and vehicles must be restricted to the informal pathways, areas already transformed, and the development footprint.</li> <li>• Waste management mitigation measures must be strictly adhered to.</li> </ul>	<ul style="list-style-type: none"> <li>• Prospecting area is kept free of invasive plant species.</li> </ul>
<p><b>FAUNA</b></p> <p>Mitigating the fauna component.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPR.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Ensure no fauna is caught, killed, harmed, sold, or played with.</li> <li>• Instruct workers to report any animals that may be trapped in the working area.</li> <li>• Ensure no snares are set or nests raided for eggs or young.</li> <li>• Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas.</li> <li>• All construction and maintenance motor vehicle operators should undergo an environmental induction that includes</li> </ul>	<ul style="list-style-type: none"> <li>• Disturbance to fauna is minimised.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
		instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.	
<p><b>CULTURE/HERITAGE</b></p> <p>Mitigating cultural/heritage aspects.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>• Confine all prospecting to the approved footprint area.</li> <li>• Once the drill sites have been confirmed these areas have to be subjected to a heritage walk down, this should be conducted prior to the commencement of prospecting activities.</li> <li>• Implement the following chance find procedure when discoveries are made on site: <ul style="list-style-type: none"> <li>▪ If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.</li> <li>▪ It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.</li> <li>▪ The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify SAHRA.</li> <li>▪ Work may only continue once the go-ahead was issued by SAHRA.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Impact to cultural/heritage resources is avoided or at least minimised.</li> </ul>
<p><b>EXISTING INFRASTRUCTURE</b></p> <p>Control of access road.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p>	<ul style="list-style-type: none"> <li>• Divert storm water around the access road to prevent erosion.</li> <li>• Access roads and tracks must make use as far as is possible of existing farm roads and tracks. Ideally, the</li> </ul>	<ul style="list-style-type: none"> <li>• The access road remains accessible to the road users during the operational phase, and upon closure the road is returned in a better, or at least the same state as received by the prospecting right holder.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
	Compliance to be monitored by the Environmental Control Officer.	<p>routes will be approved and documented by an Environmental Control Officer (ECO).</p> <ul style="list-style-type: none"> <li>Repair rutting and erosion of the access road caused as a direct result of the prospecting activities.</li> </ul>	
<p><b>GENERAL</b></p> <p>Waste management</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPR.</p> <p>Compliance to be monitored by the Environmental Control Officer.</p>	<ul style="list-style-type: none"> <li>Provision must be made for proper retention of all garbage, domestic wastes, and drilling wastes. Bins with lids or skips must be provided and these must be emptied at an approved disposal site. No refuse of any sort may be buried or burned at the site.</li> <li>Fuels and oils must be held in leak-free containers and must be kept on drip trays when not in use.</li> <li>Waste oils and the like, including items such as used oil filters and oil-soaked paper or rags, must be retained in sealed containers and be kept on drip trays.</li> <li>Vehicles and machines must be refuelled or serviced over drip trays. Any soil contaminated by fuel or oil spills must be collected and be held in a suitable sealed container prior to removal to an approved disposal site. A hazmat kit of appropriate capacity must be kept on the site at all times.</li> <li>On completion of drilling operations at each site, all materials, including wastes or litter, must be removed for re-use at another site or for disposal as may be relevant. The site must be cleaned and tidied and its condition must be approved by the landowner before the contractor may leave the site.</li> <li>Provide ablution facilities in the form of a chemical toilet that is placed outside the 1:100-year flood line of any open water source. Ensure the toilet is serviced at least once every two weeks for the duration of the prospecting activities.</li> <li>Ensure that the use of any temporary, chemical toilet facilities does not cause any pollution to water sources or pose a health hazard. In addition, ensure that no form of secondary pollution arise from the disposal of refuse or</li> </ul>	<ul style="list-style-type: none"> <li>Wastes are appropriately stored, handled, and safely disposed of at a recognised waste facility.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
		<p>sewage from the temporary, chemical toilets. Address any pollution problems arising from the above immediately.</p> <ul style="list-style-type: none"> <li>• Equip the diesel bowser with a drip tray if used on site. The nozzle of the bowser must rest in a sleeve to prevent dripping after refuelling.</li> <li>• Clean drip trays after use. Do not use dirty drip trays.</li> <li>• Keep a spill kit on site.</li> <li>• Collect any effluents containing oil, grease or other industrial substances in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.</li> <li>• Collect the contaminated soil from spillage that occurred, such as oil or diesel leaking from a burst pipe, within the first hour of occurrence, in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility. File proof.</li> <li>• Compile a waste management plan and implement it on site. The plan must focus on the waste hierarchy of the NEM: WA.</li> <li>• Contain general waste in marked, sealable, refuse bins placed at a designated area and remove waste from the prospecting area to a recognised general waste landfill site.</li> <li>• Prevent the burning or burying of waste on site.</li> <li>• Report any significant spillage of chemicals, fuels etc. during the lifespan of the prospecting activities to the Department of Water and Sanitation and other relevant authorities.</li> <li>• Park the drill machinery at the prospecting area with drip trays placed underneath stationary vehicles.</li> </ul>	
<p><b>GENERAL</b> Health and safety aspects.</p>	<p>Site Manager to ensure compliance with the guidelines as stipulated in the EMPr.</p>	<ul style="list-style-type: none"> <li>• Ensure adequate ablution facilities and water for human consumption is daily available on site.</li> <li>• Ensure that workers have access to the correct PPE as required by law.</li> </ul>	<ul style="list-style-type: none"> <li>• Employees work in a healthy and safe environment.</li> </ul>

MANAGEMENT OBJECTIVES	ROLE	MANAGEMENT ACTION	MANAGEMENT OUTCOME
	Compliance to be monitored by the Environmental Control Officer.	<ul style="list-style-type: none"><li>• No trespassing on private property outside the approved area will be allowed.</li><li>• Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).</li></ul>	

**n) Aspects for inclusion as conditions of Authorisation.**

Any aspects which must be made conditions of the Environmental Authorisation

The management objectives listed in this report under *Part A(1)(m) Proposed impact management objectives and the impact management outcomes for inclusion in the EMPR* above should be considered for inclusion in the environmental authorisation.

**o) Description of any assumptions, uncertainties, and gaps in knowledge.**

(Which relate to the assessment and mitigation measures proposed)

The assumptions made in this document which relate to the assessment and mitigation measures proposed, stem from site specific information gathered from site inspections, desktop studies as well as the specialist study. No uncertainty regarding the proposed project or the receiving environment could be identified.

**p) Reasoned opinion as to whether the proposed activity should or should not be authorised.****i) Reasons why the activity should be authorised or not.**

Should the mitigation measures and monitoring programmes proposed in this document be implemented on site, no fatal flaws could be identified that were deemed as severe as to prevent the activity continuing.

**ii) Conditions that must be included in the authorisation.**

The management objectives listed in this report under *Part A(1)(m) Proposed impact management objectives and the impact management outcomes for inclusion in the EMPR* should be considered for inclusion in the environmental authorisation.

**q) Period for which the Environmental Authorisation is required.**

The Applicant requests the Environmental Authorisation to be valid for a five-year period to correspond with the validity of the prospecting right.

**r) 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 Programme report.

## s) Financial Provision

State the amount that is required to both manage and rehabilitate the environment in respect of rehabilitation.

### i) Explain how the aforesaid amount was derived.

The prospecting activities will include surface sampling, drilling over 83 954 ha area. The calculation of the quantum for financial provision was according to Section B of the working manual. Drill site will entail Reverse Circulation (RC) and Diamond (Core) drilling methods approximately (10m x 10m) in area at a maximum of 4 sites at any given time. Total disturbance less than 0.04 ha.

Boreholes will vary between 10 - 30 boreholes to be drilled throughout the prospecting area. Total disturbance less than 0.3 ha for the entire life of the prospecting right area. Prior to moving to the next drill block these sites will have to be fully rehabilitated as per the mitigation measures set out in this document as well as in consultation with the landowner / landowners, thereby keeping the impact on the receiving environment as low as possible. If the applicant would not comply with the progressive rehabilitation procedure. In light of the above, the amount that will be necessary for the rehabilitation of damages caused by the operation, both sudden closures during the normal operation of the project and to manage and rehabilitate the environment at final, planned closure gives a sum total of R 88 353,14.

### ii) Confirm that this amount can be provided 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 or Prospecting Work Programme as the case may be).

Solium Energy (Pty) Ltd will be responsible for the financial and technical aspects of the proposed prospecting project. The operating expenditure is provided for as such in the Prospecting Work Programme as presented in the PWP.

## t) Specific Information required by the competent Authority.

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

#### (1) Impact on the 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, attach the investigation report as an Appendix)

The following potential impacts were identified that may impact on socio-economic conditions of directly affected persons:



- **Visual intrusion associated with the proposed prospecting activities:**

The viewshed analysis showed that the visual impact of the proposed prospecting operation will be of low significance. The small scale of the proposed operation contributes to the low visual significance. Should the Applicant successfully rehabilitate the prospecting areas (upon closure), no residual visual impact is expected upon closure of the prospecting activities.

- **Dust nuisance caused as a result of the proposed prospecting activities:**

The proposed activity will contribute the emissions of a drilling rig during the operational phase. Should the prospecting right holder implement the mitigation measures proposed in this document and the EMPR the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use.

- **Noise nuisance as a result of prospecting activities:**

The prospecting activity will contribute the emissions of one drill rig and two site vehicles at a time for the duration of the invasive operational phase. Dust generated as result of the prospecting will also stem from the movement of these vehicles. Should the PR Holder implement the mitigation measures proposed in this document and the EMPR the impact on the air quality of the surrounding environment is deemed to be of low significance and compatible with the current land use.

- **Employment opportunities and socio-economic impact:**

The operation will provide employment opportunities to local employees. The operation will contribute to the local economy in the area, both directly and through the multiplier effect that its continued presence will create.

Equipment and supplies will be purchased locally, and wages are spent at local businesses, generating both jobs and income in the area. Although the employees are not resident on the site, they will be from the surrounding community.

- **Prospecting affecting surface water or aggravating the scarcity of water:**

The prospecting activity requires ±1 000 l of water/day that is bought in a controlled manner from the landowners.

- **Access control and management of existing infrastructure:**

Site management will at all times be responsible for the movement of their employees. No prospecting personnel will be allowed to wander outside the approved footprint. The contractor will sign an agreement to this effect upon appointment and will be held responsible for damages to fences or gates left ajar by prospecting personnel.

**(2) 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 the 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).

Due to the geographical size of the exploration application and the fact that no intrusive activities will occur at this point of the application, it was deemed not feasible to conduct fieldwork at this point. However, once the drill sites have been confirmed these areas have to be subjected to a heritage walk down, which should be conducted prior to the commencement of prospecting activities. The Applicant will implement a chance-find protocol on site for the duration of the site establishment, operational- and decommissioning phase. Should sensitive areas be identified the boreholes will move accordingly.

**u) Other matters required in terms of section 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)

**Identified Alternatives**

The proposed prospecting activities aim to utilize both non-invasive and invasive methods, including borehole drilling, to retrieve geological core samples. Due to the exploratory nature of the project, alternative site locations were not considered feasible or reasonable. The prospecting right covers a defined area, and target sites are identified based on geological surveys and non-invasive prospecting outcomes. Flexibility in adjusting drilling sites ensures avoidance of ecologically sensitive areas, rendering specific alternative locations unnecessary.

### **Type of Activity to be Undertaken**

The activity involves minimal disturbance through controlled invasive prospecting, such as Reverse Circulation (RC) and Diamond (Core) drilling. Bulk sampling, permanent infrastructure, and large-scale disturbance are excluded, significantly reducing environmental impacts. Activities will be conducted in a phased manner, starting with non-invasive surveys followed by selective invasive drilling.

### **Design and Layout of the Activity**

The design is adaptable, with drilling sites occupying only 10m x 10m per site and a maximum of four active sites at any given time. The cumulative disturbance for the entire prospecting area is under 0.3 hectares. Adjustments to the layout will ensure sensitive areas are avoided, and specialist input will refine site selection.

### **Technology to be Used in the Activity**

Modern, efficient drilling techniques like RC and Diamond (Core) drilling will minimize the footprint and environmental disturbance. Equipment will be transported using standard vehicles on existing roads, negating the need for new access routes or heavy machinery.

### **No-Go Alternative**

The no-go alternative entails not proceeding with the prospecting activities. While this option avoids environmental impacts, it foregoes the potential economic and developmental benefits of identifying mineral resources. Additionally, the proposed activity's minimal disturbance and mitigation measures ensure that impacts on biodiversity and ecosystems remain low and manageable.

In conclusion, no reasonable or feasible site alternatives were considered due to the exploratory nature of the activity, the minimal environmental disturbance, and the flexibility in site selection to avoid sensitive areas. The EAP, therefore, recommends proceeding with the proposed activity, subject to strict compliance with mitigation measures and ongoing environmental monitoring.

The no-go alternative was not deemed to be the preferred alternative as:

- The applicant will not be able to prospect for any possible mineral resource;
- The application, if approved, would allow the applicant to determine the available mineral as well as provide employment opportunities to local employees. Should the no-go alternative be followed, these opportunities will be lost to the applicant, potential employees, and clients; and
- The applicant will not be able to diversify the income of the property.

Not proceeding with the proposed operation will entail that a mineral which if found will contribute towards the local and provincial social and economic structures of the area, will not be mined, and that this opportunity will be lost.

## PART B

### ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

#### 1. ENVIRONMENTAL MANAGEMENT PROGRAMME.

##### a) Details of the EAP,

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

The details and expertise of Sonette Smit of Greenmined Environmental that acts as EAP on this project has been included in Part A Section 1(a) as well as Appendix I as required.

##### b) Description of the Aspects of the Activity

(Confirm that the requirements 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).

The aspects of the activity that are covered by the draft environmental management programme has been described and included in Part A, section (1)(h).

##### c) Composite Map

(Provide a map (Attached as an Appendix) at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that any areas that should be avoided, including buffers)

As mentioned under Part A, section (1)(l)(ii) this map has been compiled and is attached as Appendix C to this document.

##### d) Description of impact management objectives including management statements

###### i) Determination of closure objectives.

(Ensure that the closure objectives are informed by the type of environment described in 2.4 herein)

The end objective is for the prospecting area to return to agricultural use. No buildings/infrastructure, other than the chemical toilet and drill rig, need to be removed and the access roads/tracks will remain intact to be used by the landowners.

The decommissioning activities will consist of the following:

- Removal of all prospecting machinery from the prospecting area;
- Removal of the chemical toilet from the prospecting area;
- Landscaping and replacing the topsoil (if removed); and
- Controlling the invasive plant species.

The Applicant will comply with the minimum closure objectives as prescribed by the DMRE and detailed below:

- Rehabilitation of the Prospecting Area:

Upon closure of the prospecting activities the Applicant will remove the drilling machinery from the area.

- Final Rehabilitation:

Final rehabilitation of the surface area shall entail landscaping, levelling, maintenance, and clearing of invasive plant species. All equipment, plant and other items used during the prospecting period will be removed from site (section 44 of the MPRDA, 2002). Waste material of any description will be removed entirely from the prospecting area and disposed of at a recognized landfill facility. It will not be permitted to be buried or burned on the site. The management of invasive plant species will be done in a sporadic manner during the life of the prospecting activities. Species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto) will be eradicated from the site. Final rehabilitation shall be completed within a period specified by the Regional Manager.

**ii) Volume and rate of water use required for the operation.**

The drilling operation requires  $\pm 1\ 000$  l of water per day. Potable water will be brought to site daily by the employees. Water will be brought to site from an authorised source.

**iii) Has a water use licence has been applied for?**

An application for water use authorization to the Department of Water and Sanitation, in terms of the National Water Act, 1998 (Act No. 36 of 1998), has not been submitted as it is not deemed necessary for the proposed prospecting activities. The activities are designed to minimize impacts on water resources, adhering strictly to environmental and legal standards. Sensitive aquatic ecosystems, such as wetlands and watercourses, will be identified during pre-activity specialist walk-throughs, and these areas will be designated as no-go zones to ensure their protection. Drilling locations will be carefully selected to

maintain sufficient buffer zones from water resources, eliminating the risk of direct interaction with surface or groundwater.

The project does not involve the abstraction, storage, or diversion of water, nor does it include activities such as discharging effluents into watercourses or altering the flow regime of water systems. Strict sediment and erosion control measures will prevent sedimentation of nearby water bodies, and all chemical substances, including hydrocarbons, will be stored in bunded areas with impermeable surfaces, preventing contamination of surface or groundwater.

Additionally, existing roads will be used for transportation, avoiding the need for constructing crossings over watercourses. Given the localized and temporary nature of the activities, combined with the implementation of best practices to avoid water-related impacts, there is no requirement for water use authorization under the National Water Act.

**iv) Impacts to be mitigated in their respective phases.**

*Table 32: Impact to be mitigated in their respective phases.*

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
(as listed in 2.11.1)	of operation in which activity will take place.  State; Planning and design, Pre-Construction, Operational, Rehabilitation, Closure, Post closure	(volumes, tonnages, and hectares or m <sup>2</sup> )	(describe how each of the recommendations herein will remedy the cause of pollution or degradation and migration of pollutants)	(A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)	Describe the time period when the measures in the environmental management programme must be implemented. Measures must be implemented when required. With regard to Rehabilitation specifically this must take place at the earliest opportunity. With regard to Rehabilitation, therefore state either – Upon cessation of the individual activity or Upon the cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.
Demarcation of site with visible beacons.	Planning and surface sampling phase / Site establishment & Operational Phase	0.01 ha	Demarcation of the site will ensure that all employees are aware of the boundaries of the prospecting area, and that work stay within the approved area.	Prospecting of coal is only allowed within the boundaries of the approved area. • MPRDA, 2008 • NEMA, 1998	Beacons need to be in place throughout the life of the activity.
• Planning and surface sampling phase.	Planning and surface sampling phase / Site establishment & Operational Phase	0.01 ha	<b><u>Visual Mitigation</u></b> • Prospecting must be contained to the boundaries of the authorised area. • Every borehole site must have a neat appearance and be kept in good condition at all times.	Management closure of prospecting area must be in accordance with the: • MPRDA, 2008 • NEMA, 1998	Throughout the Planning and surface sampling phase / Site establishment phase.



ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<ul style="list-style-type: none"> <li>Upon closure every borehole site must be rehabilitated and landscaped to address any residual impact.</li> <li>The site must have a neat appearance and be kept in good condition at all times.</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	Planning and surface sampling phase / Site establishment	0.01 ha	<p><b><u>Impact on Vegetation:</u></b></p> <ul style="list-style-type: none"> <li>The prospecting boundaries must be clearly demarcated, and all operations must be contained to the approved prospecting area.</li> <li>The area outside the prospecting boundaries must be declared a no-go area, and all employees must be educated accordingly.</li> <li>Preparation of the drilling site must avoid damage to the vegetation as far as is possible.</li> <li>The size of the drilling sites must be restricted to a practical minimum and must be approved by the landowner and ECO.</li> <li>The invasive plant species management plan attached as Appendix J must be implemented on site to control weeds and invasive plants on denuded areas, topsoil heaps and reinstated areas.</li> </ul>	Natural vegetated areas must be managed in accordance with the: <ul style="list-style-type: none"> <li>NEM:BA 2004</li> <li>Northern Cape Biodiversity Plan</li> </ul>	Throughout the Planning and surface sampling phase / Site establishment phase.
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	Planning and surface sampling phase / Site establishment	0.01 ha	<p><b><u>Topsoil Management:</u></b></p> <p>As mentioned earlier, the applicant will not remove any topsoil due to the fast mobility of the drill rig. The boreholes will be capped with sand material from around the boreholes, and the area rehabilitated as they move to the next borehole. The following standard mitigation measure will be adhered to in the event of any possible removal of topsoil:</p>	Topsoil must be managed in accordance with the: <ul style="list-style-type: none"> <li>CARA, 1983</li> <li>NEM:BA, 2004</li> <li>MPRDA, 2008</li> </ul>	Throughout the Planning and surface sampling phase / Site establishment -, operational, and decommissioning phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<ul style="list-style-type: none"> <li>Carefully manage and conserve the topsoil throughout the prospecting and rehabilitation process.</li> <li>Ensure topsoil stripping, stockpiling, and re-spreading is done in a systematic way.</li> <li>Place topsoil heaps on a levelled area within the prospecting footprint area. Do not stockpile topsoil in undisturbed areas.</li> <li>Protect topsoil stockpiles against losses by water and wind erosion. Position stockpiles so as not to be vulnerable to erosion by wind and water. Establishment of plants on the stockpiles will help prevent erosion.</li> <li>Spread the topsoil evenly over the rehabilitated area, to a depth of 300 mm, upon closure of the site.</li> <li>Strive to re-instate topsoil at a time of the year when vegetation cover can be established as quickly as possible afterwards, to that erosion of returned topsoil is minimized. The best time of year is at the end of the rainy season.</li> <li>Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase.</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	Planning and surface sampling phase -, Operational- and Decommissioning phase	0.01 ha	<p><b><u>Management of Invader Plant Species:</u></b></p> <ul style="list-style-type: none"> <li>An invasive plant species management plan (Appendix J) must be implemented at the site to ensure the management and control of all species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto). Weed/alien clearing must be done on an</li> </ul>	Invader plants must be managed in accordance with the: <ul style="list-style-type: none"> <li>CARA, 1983</li> <li>NEM:BA 2004</li> <li>Invasive Plant Species Management Plan (Appendix J)</li> </ul>	Throughout the planning and surface sampling phase -, operational, and decommissioning phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<p>ongoing basis throughout the life of the prospecting activities.</p> <ul style="list-style-type: none"> <li>All topsoil (if applicable) must be kept free of invasive plant species.</li> <li>Management must take responsibility to control declared invader or exotic species on the rehabilitated areas. The following control methods can be used: <ul style="list-style-type: none"> <li>The plants can be uprooted, felled, or cut off and can be destroyed completely.</li> <li>The plants can be treated chemically by a registered pest control officer (PCO) through the use of an herbicide recommended for use by the PCO in accordance with the directions for the use of such an herbicide.</li> </ul> </li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	Planning and surface sampling phase / Site establishment - and Operational phase	0.01 ha	<p><b><u>Protection of Fauna:</u></b></p> <ul style="list-style-type: none"> <li>The site manager must ensure no fauna is caught, killed, harmed, sold, or played with.</li> <li>Workers must be instructed to report any animals that may be trapped in the working area.</li> <li>No snares may be set, or nests raided for eggs or young.</li> <li>Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas.</li> <li>All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife.</li> </ul>	Fauna must be managed in accordance with the: <ul style="list-style-type: none"> <li>NEM:BA 2004</li> </ul>	Throughout the Planning and surface sampling phase / site establishment -, and operational phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			Speed limits must still be enforced to ensure that road killings and erosion is limited.		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	Planning and surface sampling phase / Site establishment - and Operational phase	0.01ha	<p><b><u>Protection of biodiversity and ecosystems</u></b></p> <ul style="list-style-type: none"> <li>Habitat types delineated within field assessment area indicated as very high with avoidance mitigation should be avoided and no destructive development activities should be considered.</li> <li>Habitat types delineated within field assessment area indicated as high with avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted, limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.</li> <li>Prevent the further loss and fragmentation of vegetation communities, the CBA 1, CBA 2, ESA, and NPAES Focus Areas within and in the vicinity of the PAOI;</li> <li>Reduce soil erosion;</li> <li>Reduce the negative fragmentation effects of the development; and</li> <li>Prevent the direct and indirect loss and disturbance of flora species and communities (including any potentially protected or Species of Conservation Concern).</li> <li>All activities must make use of existing roads and tracks as far as practically and feasibly</li> </ul>	<p>Biodiversity and ecosystems must be managed in accordance with the:</p> <p>NEM:BA 2004</p>	Throughout the Planning and surface sampling phase / site establishment -, and operational phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<p>possible. No new roads are to be constructed under any circumstance. Parking of vehicles may only occur in already modified areas.</p> <ul style="list-style-type: none"> <li>• A protected tree and a protected plant survey must be conducted by a suitably qualified ecologist and an estimate made of the number of protected trees which were lost during vegetation clearing. The replacement of the trees must be discussed with the department.</li> <li>• A habitat rehabilitation plan must be compiled and implemented for all developed areas.</li> <li>• Areas that have been disturbed but will not undergo development must be revegetated with indigenous vegetation.</li> <li>• A fire management plan needs to be compiled and implemented to restrict the impact fire would have on the surrounding areas.</li> <li>• Any holes/deep excavations must be dug in a progressive manner and shouldn't be left open overnight. Should any holes remain open overnight they must be properly covered temporarily to ensure that no small fauna species fall in. Holes must be subsequently inspected for fauna prior to backfilling.</li> </ul>		
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase.</li> </ul>	Site Establishment-, Operational Phase	0.01 ha	<p><b><u>Fugitive Dust Emission Mitigation:</u></b></p> <ul style="list-style-type: none"> <li>• The liberation of dust into the surrounding environment must be effectively controlled by the use of, inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).</li> <li>• The site manager must ensure continuous assessment of all dust suppression equipment</li> </ul>	<p>Dust generation must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>• NEM: AQA. 2004 Regulation 6(1)</li> <li>• National Dust Control Regulations, GN No R827</li> <li>• ASTM D1739 (SANS 1137:2012)</li> </ul>	Throughout the planning and surface sampling phase -, operational, and decommissioning phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<p>to confirm its effectiveness in addressing dust suppression.</p> <ul style="list-style-type: none"> <li>Speed on the access road must be limited to 40 km/h to prevent the generation of excess dust.</li> <li>Areas devoid of vegetation, which could act as a dust source, must be minimized and vegetation removal may only be done immediately prior to prospecting.</li> <li>Weather conditions must be taken into consideration upon commencement of daily operations. Limiting operations during very windy periods would reduce airborne dust and resulting impacts.</li> <li>All dust generating activities shall comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM: AQA (Act 39 of 2004) and ASTM D1739 (SANS 1137:2012).</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	Site Establishment-, Operational-, and Decommissioning Phase	0.01 ha	<p><b>Noise Handling:</b></p> <ul style="list-style-type: none"> <li>The prospecting right holder must ensure that employees and staff conduct themselves in an acceptable manner while on site.</li> <li>No loud music may be permitted at the prospecting area.</li> <li>All prospecting vehicles must be equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996 (Act No 93 of 1996).</li> <li>Best practice measures shall be implemented in order to minimize potential noise impacts.</li> <li>Noise generated on-site from all the proposed activities must comply with the Northern Cape</li> </ul>	Noise generation must be managed in accordance with the: <ul style="list-style-type: none"> <li>NEM: AQA. 2004 Regulation 6(1)</li> <li>NRTA, 1996</li> </ul>	Throughout the Planning and surface sampling phase / site establishment -, operational-, and decommissioning phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			Noise Control Regulations Provincial Notice 200/2013.		
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase.</li> <li>• Closing of drill holes and landscaping upon closure of the prospecting area.</li> </ul>	Site Establishment-, Operational-, and Decommissioning Phase	0.01 ha	<p><b><u>Waste Management:</u></b></p> <ul style="list-style-type: none"> <li>• Provision must be made for proper retention of all garbage, domestic wastes, and drilling wastes. Bins with lids or skips must be provided and these must be emptied at an approved disposal site. No refuse of any sort may be buried or burned at the site.</li> <li>• Fuels and oils must be held in leak-free containers and must be kept on drip trays when not in use.</li> <li>• Waste oils and the like, including items such as used oil filters and oil-soaked paper or rags, must be retained in sealed containers and be kept on drip trays.</li> <li>• Vehicles and machines must be refuelled or serviced over drip trays. Any soil contaminated by fuel or oil spills must be collected and be held in a suitable sealed container prior to removal to an approved disposal site. A hazmat kit of appropriate capacity must be kept on the site at all times.</li> <li>• On completion of drilling operations at each site, all materials, including wastes or litter, must be removed for re-use at another site or for disposal as may be relevant. The site must be cleaned and tidied and its condition must be approved by the landowner before the contractor may leave the site.</li> <li>• Ablution facilities must be provided in the form of a chemical toilet. The chemical toilet must</li> </ul>	<p>Prospecting related waste must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>• NWA, 1998</li> <li>• NEM: WA, 2008</li> <li>• NEM: WA, 2008: National norms and standards for the storage of waste (GN 926)</li> <li>• NEMA, 1998 (Section 30)</li> </ul>	Throughout the Planning and surface sampling phase / site establishment -, operational-, and decommissioning phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<p>be placed outside the 1:100-year floodline of any open water source and must be serviced at least once every two weeks for the duration of the prospecting activities.</p> <ul style="list-style-type: none"> <li>• The use of any temporary, chemical toilet facilities may not cause any pollution to water sources or pose a health hazard. In addition, no form of secondary pollution should arise from the disposal of refuse or sewage from the temporary, chemical toilets. Any pollution problems arising from the above are to be addressed immediately by the prospecting right holder.</li> <li>• Site management must ensure drip trays are cleaned after each use. No dirty drip trays may be used on site.</li> <li>• A spill kit must be available on-site which can be operated by trained employees for the adhoc remediation of minor chemical and hydrocarbon spillages.</li> <li>• Any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.</li> <li>• Should spillage occur, such as oil or diesel leaking from a burst pipe, the contaminated soil must, within the first hour of occurrence, be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility. Proof must be filed.</li> <li>• A waste management plan must be compiled by site management and implemented on site.</li> </ul>		



ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<p>The plan must focus on the waste hierarchy of the NEM: WA.</p> <ul style="list-style-type: none"> <li>• General waste must be contained in marked, sealable, refuse bins placed at a designated area, to be removed when filled to capacity to a recognised general waste landfill site.</li> <li>• No waste may be buried or burned on the site.</li> <li>• No chemicals or hazardous materials may be stored at the prospecting area.</li> <li>• It is important that any significant spillage of chemicals, fuels etc. during the lifespan of the prospecting activities is reported to the Department of Water and Sanitation and other relevant authorities.</li> <li>• To lower the risk of accidental hydrocarbon spillages all machinery must be parked at the prospecting area with drip trays placed underneath stationary vehicles.</li> <li>• Any event resulting in the spill or leak of hydrocarbons or any other hazardous solvents into the ground and/or water resources, must be reported within the prescribed timeframes to all relevant authorities, including the Directorate: Pollution and Chemicals Management. Containment, clean-up, and remediation must commence immediately in the case of NEMA section 30 incidents, and the necessary documentation must be completed and submitted within the prescribed timeframes.</li> </ul>		

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	Operational Phase	0.01 ha	<p><b><u>Archaeological, Heritage and Palaeontological Aspects:</u></b></p> <ul style="list-style-type: none"> <li>All prospecting must be confined to the development footprint area.</li> <li>If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.</li> <li>It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.</li> <li>Personnel involved in the shallow pit sampling must be instructed to be alert for the occurrence of fossil bones. Fossil bones may also be noticed weathering out in the sides of old prospecting excavations or exposed in the adjacent spoil heaps of excavated material. In the event of such discoveries the Fossil Finds Procedure.</li> <li>The senior on-site Manager must inform the ECO of the chance find and its immediate impact on operations. The ECO must then contact a professional archaeologist for an assessment of the finds who must notify SAHRA.</li> <li>Work may only continue once the go-ahead was issued by SAHRA.</li> </ul>	<p>Cultural/heritage aspects must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NHRA, 1999</li> </ul>	Throughout the operational phase.

ACTIVITIES	PHASE	SIZE AND SCALE OF DISTURBANCE	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
			<ul style="list-style-type: none"> <li>It is recommended that fossil material extracted from the boreholes, or later separated during sample analysis, be kept and bagged for identification by a palaeontologist. For preliminary analysis, quality images of the fossil material should be forwarded by email for examination by a specialist, in order to identify specimens of importance for stratigraphic diagnosis, and specimens requiring further examination and diagnosis.</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	Planning and surface sampling phase / Site establishment -, Operational-, and Decommissioning phase	0.01ha	<p><b><u>Management of Health and Safety Risks:</u></b></p> <ul style="list-style-type: none"> <li>Adequate ablution facilities and water for human consumption must daily be available on site.</li> <li>Workers must have access to the correct personal protection equipment (PPE) as required by law.</li> <li>All operations must comply with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).</li> </ul>	Health and safety aspects must be managed in accordance with the: <ul style="list-style-type: none"> <li>MHSA, 1996</li> <li>OHSA, 1993</li> <li>OHSAS, 18001</li> </ul>	Throughout the Planning and surface sampling phase / site establishment -, operational and decommissioning phase.

### e) Impact Management Outcomes

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

Table 33: Impact Management Outcomes

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	MITIGATION TYPE	STANDARD TO BE ACHIEVED
<p>whether listed or not listed (E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc..etc.)</p>	<p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc...etc..)</p>		<p>In which impact is anticipated  (e.g. Construction, commissioning, operational Decommissioning, closure, post-closure))</p>	<p>(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc...etc..)  E.g.  <ul style="list-style-type: none"> <li>• Modify through alternative method.</li> <li>• Control through noise control.</li> <li>• Control through management and monitoring.</li> </ul> Remedy through rehabilitation.</p>	<p>(Impact avoided, noise levels, dust levels, rehabilitation standards, end use objectives) etc.</p>
<ul style="list-style-type: none"> <li>• Demarcation of site with visible beacons.</li> </ul>	<ul style="list-style-type: none"> <li>• No impact could be identified other than the beacons being outside the boundaries of the approved prospecting area.</li> </ul>	<p>N/A</p>	<p>Planning and surface sampling phase</p>	<p>Control through management and monitoring.</p>	<p>Prospecting of coal is only allowed within the boundaries of the approved area.</p> <ul style="list-style-type: none"> <li>• MPRDA, 2008</li> <li>• NEMA, 1998</li> </ul>
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> <li>• Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>• Visual intrusion as a result of planning and surface sampling phase</li> <li>• Uncapped boreholes left by the contractor</li> </ul>	<p>The visual impact may affect the aesthetics of the landscape.</p>	<p>Planning and surface sampling phase &amp; Operational Phase</p>	<p><u>Control:</u> Implementing proper housekeeping.</p>	<p>Management closure of prospecting area must be in accordance with the:</p> <ul style="list-style-type: none"> <li>• MPRDA, 2008</li> <li>• NEMA, 1998</li> </ul>

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	MITIGATION TYPE	STANDARD TO BE ACHIEVED
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on fauna within the footprint area</li> <li>Impact of the natural vegetation of the footprint.</li> <li>Impact of the natural vegetation of the footprint during decommissioning phase</li> <li>Uncapped boreholes left by the contractor</li> </ul>	This will impact on the biodiversity of the receiving environment.	Planning and surface sampling phase & Operational Phase - and Decommissioning phase	<u>Control:</u> Implementing soil- and storm water management.	Invader plants must be managed in accordance with the: <ul style="list-style-type: none"> <li>CARA, 1983</li> <li>NEM:BA 2004</li> <li>Invasive Plant Species Management Plan (Appendix J)</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Dust nuisance as a result of the planning and surface sampling phase.</li> </ul>	Increased dust generation will impact on the air quality of the receiving environment.	Planning and surface sampling phase & Operational Phase - and Decommissioning phase	<u>Control:</u> Dust suppression methods and proper housekeeping.	Dust generation must be managed in accordance with the: <ul style="list-style-type: none"> <li>NEM: AQA. 2004 Regulation 6(1)</li> <li>National Dust Control Regulations, GN No R827</li> <li>ASTM D1739 (SANS 1137:2012)</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Noise nuisance as a result of surface sampling.</li> </ul>	Should noise levels become excessive it may have an impact on the noise ambiance of the receiving environment.	Planning and surface sampling phase & Operational Phase - and Decommissioning phase	<u>Control:</u> Noise suppression methods and proper housekeeping.	Noise generation must be managed in accordance with the: <ul style="list-style-type: none"> <li>NEM: AQA. 2004 Regulation 6(1)</li> <li>NRTA, 1996</li> </ul>

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	MITIGATION TYPE	STANDARD TO BE ACHIEVED
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Potential hydrocarbon contamination from leaks or spills</li> <li>Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities;</li> </ul>	Contamination of the footprint area will negatively impact the soil, surface runoff and potentially the groundwater. It will also incur additional costs to the prospecting right holder.	Planning and surface sampling phase & Operational Phase - and Decommissioning phase	<u>Control &amp; Remedy:</u> Proper housekeeping and implementation of an emergency response plan and waste management plan.	Prospecting related waste must be managed in accordance with the: <ul style="list-style-type: none"> <li>NWA, 1998</li> <li>NEM: WA, 2008</li> <li>NEM: WA, 2008: National norms and standards for the storage of waste (GN 926)</li> <li>NEMA, 1998 (Section 30)</li> </ul>
<ul style="list-style-type: none"> <li>Prospecting activities / drilling.</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on area/infrastructure of heritage or cultural concern.</li> </ul>	This could impact on the cultural and heritage legacy of the receiving environment.	Operational Phase	<u>Control &amp; Stop:</u> Implementing good management practices, as well as the chance-find protocol.	Cultural/heritage aspects must be managed in accordance with the: <ul style="list-style-type: none"> <li>NHRA, 1999</li> </ul>
<ul style="list-style-type: none"> <li>Prospecting activities / drilling.</li> </ul>	<ul style="list-style-type: none"> <li>Deterioration of the access road to the prospecting area.</li> </ul>	Collapse of the road infrastructure will affect the landowner.	Operational Phase	<u>Control &amp; Remedy:</u> Maintaining the access road for the duration of the operational phase, as well as leaving it in a representative or better condition than prior to prospecting.	The access road must be managed in accordance with the: <ul style="list-style-type: none"> <li>NRTA, 1996</li> </ul>

## f) Impact Management Actions

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

Table 34: Impact Management Actions

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
<p>whether listed or not listed (E.g. Excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc..etc.)</p>	<p>(e.g. dust, noise, drainage surface disturbance, fly rock, surface water contamination, groundwater contamination, air pollution etc...etc..)</p>	<p>(modify, remedy, control, or stop) through (e.g. noise control measures, storm-water control, dust control, rehabilitation, design measures, blasting controls, avoidance, relocation, alternative activity etc... etc.)</p> <p>E.g.</p> <ul style="list-style-type: none"> <li>• Modify through alternative method.</li> <li>• Control through noise control.</li> <li>• Control through management and monitoring.</li> </ul> <p>Remedy through rehabilitation.</p>	<p>Describe the time period when the measures in the environmental management programme must be implemented Measures must be implemented when required.</p> <p>With regard to Rehabilitation specifically this must take place at the earliest opportunity. With regard to Rehabilitation, therefore state either: Upon cessation of the individual activity Or. Upon the cessation of mining bulk sampling or alluvial diamond prospecting as the case may be.</p>	<p>(A description of how each of the recommendations in 2.11.6 read with 2.12 and 2.15.2 herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)</p>
<ul style="list-style-type: none"> <li>• Demarcation of site with visible beacons.</li> </ul>	<ul style="list-style-type: none"> <li>• No impact could be identified other than the beacons being outside the boundaries of the approved prospecting area.</li> </ul>	<p>Demarcation of the site will ensure that all employees are aware of the boundaries of the prospecting area, and that work stay within the approved area.</p>	<p>Beacons need to be in place throughout the life of the activity.</p>	<p>Prospecting of the mineral resource is only allowed within the boundaries of the approved area.</p> <ul style="list-style-type: none"> <li>• MPRDA, 2008</li> <li>• NEMA, 1998</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> <li>• Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>• Visual intrusion as a result of planning and surface sampling phase</li> <li>• Uncapped boreholes left by the contractor</li> </ul>	<ul style="list-style-type: none"> <li>• Prospecting must be contained to the boundaries of the authorised area.</li> <li>• The site must have a neat appearance and be kept in good condition at all times.</li> <li>• The prospecting right holder must limit vegetation removal (if applicable), and stripping of topsoil may only be done immediately prior to the use of a specific area.</li> <li>• Upon closure the stockpile area must be rehabilitated and levelled to remove the visual impact on the aesthetic value of the area.</li> </ul>	Throughout the site establishment-, operational, and decommissioning phase.	Management closure of prospecting area must be in accordance with the: <ul style="list-style-type: none"> <li>• MPRDA, 2008</li> <li>• NEMA, 1998</li> </ul>
<ul style="list-style-type: none"> <li>• Closing of drill holes and landscaping upon closure of the prospecting area.</li> </ul>	<ul style="list-style-type: none"> <li>• Erosion after rehabilitation</li> </ul>	As mentioned earlier, the applicant will not remove any topsoil due to the fast mobility of the drill rig. The boreholes will be capped with sand material from around the boreholes, and the area rehabilitated as they move to the next borehole. The following standard mitigation measure will be adhered to in the event of any possible removal of topsoil: <ul style="list-style-type: none"> <li>• Carefully manage and conserve the topsoil throughout the prospecting and rehabilitation process.</li> <li>• Ensure topsoil stripping, stockpiling, and re-spreading is done in a systematic way.</li> <li>• Place topsoil heaps on a levelled area within the prospecting footprint area. Do not stockpile topsoil in undisturbed areas.</li> <li>• Protect topsoil stockpiles against losses by water and wind erosion. Position stockpiles so as not to be vulnerable to erosion by wind and water. Establishment of plants on the stockpiles will help prevent erosion.</li> </ul>	Throughout the operational and decommissioning phase.	Topsoil & erosion must be managed in accordance with the: <ul style="list-style-type: none"> <li>• MPRDA, 2008</li> <li>• NEM:BA 2004</li> </ul>



ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• Spread the topsoil evenly over the rehabilitated area, to a depth of 300 mm, upon closure of the site.</li> <li>• Strive to re-instate topsoil at a time of the year when vegetation cover can be established as quickly as possible afterwards, to that erosion of returned topsoil is minimized. The best time of year is at the end of the rainy season.</li> <li>• Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.</li> </ul>		
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> <li>• Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>• Impact of the natural vegetation of the footprint.</li> <li>• Impact of the natural vegetation of the footprint during decommissioning phase</li> <li>• Uncapped boreholes left by the contractor</li> </ul>	<ul style="list-style-type: none"> <li>• The site manager must ensure no fauna is caught, killed, harmed, sold or played with.</li> <li>• Workers must be instructed to report any animals that may be trapped in the working area.</li> <li>• No snares may be set, or nests raided for eggs or young.</li> <li>• Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas.</li> <li>• All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.</li> <li>• The prospecting boundaries must be clearly demarcated, and all operations must be contained to the approved prospecting area.</li> </ul>	Throughout the operational, and decommissioning phase.	Invader plants must be managed in accordance with the: <ul style="list-style-type: none"> <li>• CARA, 1983</li> <li>• NEM:BA 2004</li> <li>• Northern Cape Biodiversity Plan</li> <li>• Invasive Plant Species Management Plan (Appendix J)</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• The area outside the prospecting boundaries must be declared a no-go area, and all employees must be educated accordingly.</li> <li>• Preparation of the drilling site must avoid damage to the vegetation as far as is possible.</li> <li>• The size of the drilling sites must be restricted to a practical minimum and must be approved by the landowner and ECO. Once decided, the boundary of the site must be demarcated with a temporary fence.</li> <li>• An invasive plant species management plan (Appendix J) must be implemented at the site to ensure the management and control of all species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto). Weed/alien clearing must be done on an ongoing basis throughout the life of the prospecting activities.</li> <li>• All stockpiles (topsoil) must be kept free of invasive plant species.</li> <li>• Management must take responsibility to control declared invader or exotic species on the rehabilitated areas. The following control methods can be used: <ul style="list-style-type: none"> <li>• The plants can be uprooted, felled or cut off and can be destroyed completely.</li> <li>• The plants can be treated chemically by a registered pest control officer (PCO) through the use of an herbicide recommended for use by the PCO in accordance with the directions for the use of such an herbicide.</li> </ul> </li> </ul>		

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on fauna within the footprint area</li> </ul>	<ul style="list-style-type: none"> <li>The site manager must ensure no fauna is caught, killed, harmed, sold or played with.</li> <li>Workers must be instructed to report any animals that may be trapped in the working area.</li> <li>No snares may be set, or nests raided for eggs or young.</li> <li>Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas.</li> <li>Search and Rescue operation should occur before the construction works begin to ensure that any slow moving or burrowing species (such as moles, chameleons, snakes or tortoises) would be moved to adjacent suitable habitats by a qualified Faunal Specialist. Should any protected species need to be translocated, a permit must be obtained from the relevant authority.</li> <li>All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.</li> </ul>	<p>Throughout the site establishment-, operational-, and decommissioning phase.</p>	<p>Fauna must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NEM:BA 2004</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Impact of the natural vegetation of the footprint.</li> </ul>	<p><b><u>Protection of biodiversity and ecosystems</u></b></p> <ul style="list-style-type: none"> <li>Habitat types delineated within field assessment area indicated as very high with avoidance mitigation should be avoided and no destructive development activities should be considered.</li> </ul>	<p>Throughout the site establishment-, operational-, and decommissioning phase.</p>	<p>Biodiversity and ecosystems must be managed in accordance with the:</p> <p>NEM:BA 2004</p>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• Habitat types delineated within field assessment area indicated as high with avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted, limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.</li> <li>• Reduce soil erosion;</li> <li>• Reduce the negative fragmentation effects of the development; and</li> <li>• Prevent the direct and indirect loss and disturbance of flora species and communities (including any potentially protected or Species of Conservation Concern).</li> <li>• All activities must make use of existing roads and tracks as far as practically and feasibly possible. No new roads are to be constructed under any circumstance. Parking of vehicles may only occur in already modified areas.</li> <li>• A protected tree and a protected plant survey must be conducted by a suitably qualified ecologist and an estimate made of the number of protected trees which were lost during vegetation clearing. The replacement of the trees must be discussed with the department.</li> </ul>		

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• A fire management plan needs to be compiled and implemented to restrict the impact fire would have on the surrounding areas.</li> <li>• Any holes/deep excavations must be dug in a progressive manner and shouldn't be left open overnight. Should any holes remain open overnight they must be properly covered temporarily to ensure that no small fauna species fall in. Holes must be subsequently inspected for fauna prior to backfilling.</li> </ul>		
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>• Dust nuisance as a result of the planning and surface sampling phase.</li> </ul>	<ul style="list-style-type: none"> <li>• The liberation of dust into the surrounding environment must be effectively controlled by the use of, inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).</li> <li>• The site manager must ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.</li> <li>• Speed on the access road must be limited to 40 km/h to prevent the generation of excess dust.</li> <li>• Areas devoid of vegetation, which could act as a dust source, must be minimized and vegetation removal may only be done immediately prior to prospecting.</li> <li>• Weather conditions must be taken into consideration upon commencement of daily operations. Limiting operations during very</li> </ul>	Throughout the site establishment-, operational-, and decommissioning phase.	Dust generation must be managed in accordance with the: <ul style="list-style-type: none"> <li>• NEM: AQA. 2004 Regulation 6(1)</li> <li>• National Dust Control Regulations, GN No R827</li> <li>• ASTM D1739 (SANS 1137:2012)</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<p>windy periods would reduce airborne dust and resulting impacts.</p> <ul style="list-style-type: none"> <li>All dust generating activities shall comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM: AQA (Act 39 of 2004) and ASTM D1739 (SANS 1137:2012).</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Noise nuisance as a result of surface sampling.</li> </ul>	<ul style="list-style-type: none"> <li>The prospecting right holder must ensure that employees and staff conduct themselves in an acceptable manner while on site.</li> <li>No loud music may be permitted at the prospecting area.</li> <li>All prospecting vehicles must be equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996 (Act No 93 of 1996).</li> <li>Best practice measures shall be implemented in order to minimize potential noise impacts.</li> <li>Noise generated on-site from all the proposed activities must comply with the Northern Cape Noise Control Regulations Provincial Notice 200/2013.</li> </ul>	<p>Throughout the site establishment-, operational and decommissioning phase.</p>	<p>Noise generation must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NEM: AQA. 2004 Regulation 6(1)</li> <li>NRTA, 1996</li> <li>Northern Cape Noise Control Regulations Provincial Notice 200/2013.</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<ul style="list-style-type: none"> <li>Potential hydrocarbon contamination from leaks or spills</li> <li>Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities;</li> </ul>	<ul style="list-style-type: none"> <li>Provision must be made for proper retention of all garbage, domestic wastes, and drilling wastes. Bins with lids or skips must be provided and these must be emptied at an approved disposal site. No refuse of any sort may be buried or burned at the site.</li> <li>Fuels and oils must be held in leak-free containers and must be kept on drip trays when not in use.</li> </ul>	<p>Throughout the site establishment-, operational and decommissioning phase.</p>	<p>Prospecting related waste must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NWA, 1998</li> <li>NEM: WA, 2008</li> <li>NEM: WA, 2008: National norms and standards for the storage of waste (GN 926)</li> <li>NEMA, 1998 (Section 30)</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• Waste oils and the like, including items such as used oil filters and oil-soaked paper or rags, must be retained in sealed containers and be kept on drip trays.</li> <li>• Vehicles and machines must be refuelled or serviced over drip trays. Any soil contaminated by fuel or oil spills must be collected and be held in a suitable sealed container prior to removal to an approved disposal site. A hazmat kit of appropriate capacity must be kept on the site at all times.</li> <li>• On completion of drilling operations at each site, all materials, including wastes or litter, must be removed for re-use at another site or for disposal as may be relevant. The site must be cleaned and tidied and its condition must be approved by the landowner before the contractor may leave the site.</li> <li>• Ablution facilities must be provided in the form of a chemical toilet. The chemical toilet must be placed outside the 1:100-year floodline of any open water source and must be serviced at least once every two weeks for the duration of the prospecting activities.</li> <li>• The use of any temporary, chemical toilet facilities may not cause any pollution to water sources or pose a health hazard. In addition, no form of secondary pollution should arise from the disposal of refuse or sewage from the temporary, chemical toilets. Any pollution problems arising from the above are to be addressed immediately by the prospecting right holder.</li> <li>• Site management must ensure drip trays are cleaned after each use. No dirty drip trays may be used on site.</li> </ul>		

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<ul style="list-style-type: none"> <li>• A spill kit must be available on-site which can be operated by trained employees for the adhoc remediation of minor chemical and hydrocarbon spillages.</li> <li>• Any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.</li> <li>• Should spillage occur, such as oil or diesel leaking from a burst pipe, the contaminated soil must, within the first hour of occurrence, be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility. Proof must be filed.</li> <li>• A waste management plan must be compiled by site management and implemented on site. The plan must focus on the waste hierarchy of the NEM: WA.</li> <li>• General waste must be contained in marked, sealable, refuse bins placed at a designated area, to be removed when filled to capacity to a recognised general waste landfill site.</li> <li>• No waste may be buried or burned on the site.</li> <li>• No chemicals or hazardous materials may be stored at the prospecting area.</li> <li>• It is important that any significant spillage of chemicals, fuels etc. during the lifespan of the prospecting activities is reported to the Department of Water and Sanitation and other relevant authorities.</li> <li>• To lower the risk of accidental hydrocarbon spillages all machinery must be parked at</li> </ul>		



ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<p>the prospecting area with drip trays placed underneath stationary vehicles.</p> <ul style="list-style-type: none"> <li>Any event resulting in the spill or leak of hydrocarbons or any other hazardous solvents into the ground and/or water resources, must be reported within the prescribed timeframes to all relevant authorities, including the Directorate: Pollution and Chemicals Management. Containment, clean-up and remediation must commence immediately in the case of NEMA section 30 incidents, and the necessary documentation must be completed and submitted within the prescribed timeframes.</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on areas/infrastructure of heritage or cultural concern.</li> </ul>	<ul style="list-style-type: none"> <li>All prospecting must be confined to the development footprint area.</li> <li>If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.</li> <li>It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.</li> <li>Personnel involved in the shallow pit sampling must be instructed to be alert for the occurrence of fossil bones. Fossil bones</li> </ul>	Throughout the operational phase.	<p>Cultural/heritage aspects must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NHRA, 1999</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
		<p>may also be noticed weathering out in the sides of old prospecting excavations or exposed in the adjacent spoil heaps of excavated material. In the event of such discoveries the Fossil Finds Procedure.</p> <ul style="list-style-type: none"> <li>The senior on-site Manager must inform the ECO of the chance find and its immediate impact on operations. The ECO must then contact a professional archaeologist for an assessment of the finds who must notify SAHRA.</li> <li>Work may only continue once the go-ahead was issued by SAHRA.</li> <li>It is recommended that fossil material extracted from the boreholes, or later separated during sample analysis, be kept and bagged for identification by a palaeontologist. For preliminary analysis, quality images of the fossil material should be forwarded by email for examination by a specialist, in order to identify specimens of importance for stratigraphic diagnosis, and specimens requiring further examination and diagnosis.</li> </ul>		
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Deterioration of the access road to the prospecting area.</li> </ul>	<ul style="list-style-type: none"> <li>Storm water must be diverted around the access road to prevent erosion.</li> <li>Access roads and tracks must make use as far as is possible of existing farm roads and tracks. Ideally, the routes will be approved and documented by an Environmental Control Officer (ECO).</li> <li>Rutting and erosion of the access road caused as a direct result of the prospecting activities must be repaired by the permit holder.</li> </ul>	<p>Throughout the operational phase and decommissioning phase.</p>	<p>The access road must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>NRTA, 1996</li> </ul>

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on the Safety of the area due to increased human concentration</li> </ul>	<ul style="list-style-type: none"> <li>Adequate ablution facilities and water for human consumption must daily be available on site.</li> <li>Workers must have access to the correct personal protection equipment (PPE) as required by law.</li> <li>All operations must comply with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).</li> </ul>	<p>Throughout the site establishment-, operational and decommissioning phase.</p>	<p>Health and safety aspects must be managed in accordance with the:</p> <ul style="list-style-type: none"> <li>MHSA, 1996</li> <li>OHSA, 1993</li> <li>OHSAS, 18001</li> </ul>

## **i) Financial Provision**

### **(1) Determination of the amount of Financial Provision.**

#### **(a) Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under the Regulation.**

The primary objective is to obtain a closure certificate at the end of the life of the prospecting right at minimum cost and in as short a time period as possible whilst still complying with the requirements of the Minerals and Petroleum Resources Development Act. To realise this, the following objectives must be achieved:

- Remove all temporary infrastructure and waste from the site as per the requirements of this EMPr and of the Provincial Department of Mineral Regulation.
- Demolish / rehabilitate all roads with no post -prospecting use potential.
- Remove all waste from site.
- No wetland in the area may be compromised or destructed drill sites can be adjusted to avoid potential impacts on sensitive areas. Before any invasive activities commence, a walk-through will be conducted by specialists, including wetland and ecological experts, to identify and designate sensitive areas as no-go zones.
- Future public health and safety are not compromised.
- Ensure that no threat to surface and underground water quality remains.
- Ensure that all permanent changes in topography are sustainable and do not cause erosion or the damming up of runoff.
- Shape and contour all disturbed areas in compliance with the EMPr.
- The stockpiled topsoil (if any) will be spread over the disturbed area to a depth of at least 500 mm.
- Ensure that all rehabilitated areas are safe, stable and self-sustaining in terms of vegetation.
- Control of weeds and alien invasive plant species is an important aspect after topsoil replacement and seeding has been done in an area.
- The applicant will comply with the minimum closure objectives as prescribed by DMRE.
- Any adverse socio-economic impacts are minimised; and
- All socio-economic benefits are maximised.

**(b) Confirm specifically that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.**

This report, the Draft Basic Assessment Report, includes all the environmental objectives in relation to closure and will be made available for perusal by the landowner, registered I&APs and stakeholders over a 30-days commenting period.

**(c) Provide a rehabilitation plan that describes and shows the scale and aerial extent of the main prospecting activities, including the anticipated prospecting area at the time of closure.**

The requested rehabilitation plan is attached as Appendix D.

**(d) Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.**

The decommissioning phase will entail the final rehabilitation of the prospecting site. Final landscaping, levelling and top dressing will be done. The rehabilitation of the prospecting area as indicated on the rehabilitation plan attached as Appendix D will comply with the minimum closure objectives as prescribed by DMRE and detailed below, and therefore is deemed to be compatible:

- Rehabilitation of the surface area shall entail landscaping, levelling, top dressing, land preparation, seeding and maintenance, and weed / alien clearing.
- All Temporary Infrastructures, equipment, plant, temporary housing and other items used during the prospecting period will be removed from the site.
- Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the prospecting area and disposed of at a recognized landfill facility, proof of this removal will be kept on file at the applicant's office. It will not be permitted to be buried or burned on the site.
- Weed / Alien clearing will be done in a sporadic manner during the life of the prospecting activities. Species regarded as the National Environmental Biodiversity Act [NEMBA] (Act No. 10 of 2004) Alien and Invasive Species Regulation GNR 598 and 599 of 2014 Species regarded as needing to be eradicated from the site on final closure.

- Final rehabilitation shall be completed within a period specified by the Regional Manager.
- (e) **Calculate and state the quantum of the financial provision required to manage and rehabilitate the environment in accordance with the applicable guideline.**

The calculation of the quantum for financial provision was according to Section B of the working manual.

**Mine type and saleable mineral by-product**

According to Tables B.12, B.13 and B.14

Mine type	Uranium Ore
Saleable mineral by-product	None

**Risk ranking.**

According to Tables B.12, B.13 and B.14

Primary risk ranking (either Table B.12 or B.13)	C (Low risk).
Revised risk ranking (B.14)	N/A

**Environmental sensitivity of the mine area**

According to Table B.4

Environmental sensitivity of the mine area	Low
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**Level of information**

According to Step 4.2:

Level of information available	Limited
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**Identify closure components.**

According to Table B.5 and site-specific conditions

Component No.	Main description	Applicability of closure components (Circle Yes or No)	
1	Dismantling of processing plant and related structures (including overland conveyors and power lines)	-	NO
2(A)	Demolition of steel buildings and structures	-	NO
2(B)	Demolition of reinforced concrete buildings and structures	-	NO
3	Rehabilitation of access roads	-	NO
4(A)	Demolition and rehabilitation of electrified railway lines	-	NO
4(B)	Demolition and rehabilitation of non-electrified railway lines	-	NO
5	Demolition of housing and facilities	-	NO
6	Opencast rehabilitation including final voids and ramps	-	NO
7	Sealing of shafts, adits and inclines	-	NO
8(A)	Rehabilitation of overburden and spoils	-	NO
8(B)	Rehabilitation of processing waste deposits and evaporation ponds (basic, salt-producing)	-	NO
8(C)	Rehabilitation of processing waste deposits and evaporation ponds (acidic, metal-rich)	-	NO
9	Rehabilitation of subsided areas	-	NO
10	General surface rehabilitation, including grassing of all denuded areas	YES	-
11	River diversions	-	NO
12	Fencing	-	NO
13	Water management (Separating clean and dirty water, managing polluted water and managing the impact on groundwater)	-	NO
14	2 to 3 years of maintenance and aftercare	YES	NO

### Unit rates for closure components

According to Table B.6 master rates and multiplication factors for applicable closure components.

Component No.	Main description	Master rate	Multiplication factor
1	Dismantling of processing plant and related structures (including overland conveyors and power lines)	-	-
2(A)	Demolition of steel buildings and structures	-	-
2(B)	Demolition of reinforced concrete buildings and structures	-	-
3	Rehabilitation of access roads	-	-
4(A)	Demolition and rehabilitation of electrified railway lines	-	-
4(B)	Demolition and rehabilitation of non-electrified railway lines	-	-
5	Demolition of housing and facilities	-	-
6	Opencast rehabilitation including final voids and ramps	-	-
7	Sealing of shafts, adits and inclines	-	-
8(A)	Rehabilitation of overburden and spoils	-	-
8(B)	Rehabilitation of processing waste deposits and evaporation ponds (basic, salt-producing)	-	-
8(C)	Rehabilitation of processing waste deposits and evaporation ponds (acidic, metal-rich)	-	-
9	Rehabilitation of subsided areas	-	-
10	General surface rehabilitation, including grassing of all denuded areas	168695	1.1
11	River diversions	-	-

<b>Component No.</b>	<b>Main description</b>	<b>Master rate</b>	<b>Multiplication factor</b>
12	Fencing	-	-
13	Water management (Separating clean and dirty water, managing polluted water and managing the impact on groundwater)	-	-
14	2 to 3 years of maintenance and aftercare	22450	1.1



**Determine weighting factors.**

According to Tables B.7 and B.8

Weighting factor 1: Nature of terrain/accessibility	1.1 (Undulating)
Weighting factor 2: Proximity to urban area where goods and services are to be supplied	1.05

### Calculation of closure costs

Table B.10 Template for Level 2: "Rules-based" assessment of the quantum for financial provision

Table 35: Calculation of closure cost

CALCULATION OF THE QUANTUM							
<b>Mine:</b>	Farm 622 - Solium Energy (Pty) Ltd			<b>Location:</b>	Namaqualand Magisterial District		
<b>Evaluators:</b>	Sonette Smit			<b>Date:</b>	December 2024		
No	Description	Unit	A Quantity	B Master rate	C Multiplication factor	D Weighting factor 1	E=A *B*C*D Amount (Rand)
			Step 4.5	Step 4.3	Step 4.3	Step 4.4	
1	Dismantling of processing plant and related structures (including overland conveyors and power lines)	m <sup>2</sup>	0	22	1.0	1.1	R 0.00
2(A)	Demolition of steel buildings and structures	m <sup>2</sup>	0	305	1.0	1.1	R 0.00
2(B)	Demolition of reinforced concrete buildings and structures	m <sup>2</sup>	0	449	1.0	1.1	R 0.00
3	Rehabilitation of access roads	m <sup>2</sup>	0	55	1.0	1.1	R 0.00
4(A)	Demolition and rehabilitation of electrified railway lines	m	0	529	1.0	1.1	R 0.00
4(B)	Demolition and rehabilitations of non-electrified railway lines	m	0	289	1.0	1.1	R 0.00
5	Demolition of housing and/or administration facilities	m <sup>2</sup>	0	609	1.0	1.1	R 0.00
6	Opencast rehabilitation including final voids and ramps	ha	0	319431	0.01	1.1	R 0.00
7	Sealing of shaft, audits and inclines	m <sup>3</sup>	0	164	1.0	1.1	R 0.00
8(A)	Rehabilitation of overburden and spoils	ha	0	212954	1.0	1.1	R 0.00
8(B)	Rehabilitation of processing waste deposits and evaporation ponds (basic, salt-producing waste)	ha	0	265230	1.0	1.1	R 0.00
8(C)	Rehabilitation of processing waste deposits and evaporation ponds (acidic, metal-rich waste)	ha	0	770354	0.51	1.1	R 0.00
9	Rehabilitation of subsided areas	ha	0	178317	1.0	1.1	R 0.00
10	General surface rehabilitation	ha	0.3	168695	1.0	1.1	R 55 669,35

11	River diversions	ha	0	168695	1.0	1.1	R 0.00
12	Fencing	m	0	192	1.0	1.1	R 0.00
13	Water Management	ha	0	64143	0.6	1.1	R 0.00
14	2 to 3 years of maintenance and aftercare	ha	0.3	22450	1.0	1.1	R 7 408,50
15(A)	Specialists study	Sum	0				R 0.00
15(B)	Specialists study	Sum	0				R 0.00
Sum of items 1 to 15 above							R 63 077,85
Multiply Sum of 1-15 by Weighting factor 2 (Step 4.4)			R3 153,89		1.05	<b>Sub Total 1</b>	R 66 231,74

1	Preliminary and General	6% of Subtotal 1 if Subtotal 1 <R100 000 000.00	R 3 973,90
		12% of Subtotal 1 if Subtotal 1 >R100 000 000.00	R0.00
2	Contingency	10.0% of Subtotal 1	R 6 623,17
<b>Sub Total 2</b> (Subtotal 1 plus management and contingency)			R 76 828,82
Vat (15%)			R 11 524,32
<b>GRAND TOTAL</b> (Subtotal 3 plus VAT)			<b>R 88 353,14</b>

The amount that will be necessary for the rehabilitation of damages caused by the operation, both sudden closures during the normal operation of the project and at final, planned closure gives a sum total of **R 88 353,14**

**(f) Confirm that the financial provision will be provided as determined.**

Herewith I, the person, whose name is stated below confirm that I am the person authorised to act as representative of the Applicant in terms of the resolution submitted with the application. I herewith confirm that the company will provide the amount that will be determined by the Regional Manager in accordance with the prescribed guidelines.

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

- g) Monitoring of Impact Management Actions**
- h) Monitoring and reporting frequency.**
- i) Responsible persons**
- j) Time period for implementing impact management actions.**
- k) Mechanisms for monitoring compliance**

*Table 36: Mechanisms for monitoring compliance with and performance assessment against the EMPr and reporting thereon.*

<b>SOURCE ACTIVITY</b>	<b>IMPACTS REQUIRING MONITORING PROGRAMMES</b>	<b>FUNCTIONAL REQUIREMENTS FOR MONITORING</b>	<b>ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)</b>	<b>MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS</b>
<ul style="list-style-type: none"> <li>• Demarcation of site with visible beacons</li> </ul>	Maintenance of beacons	<ul style="list-style-type: none"> <li>• Visible beacons need to be placed at the corners of the prospecting area.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>• Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>• Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>• Ensure beacons are in place throughout the life of the prospecting activities.</li> </ul>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• Daily compliance monitoring by site management.</li> <li>• Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> </ul>	<p><b><u>Visual Characteristics:</u></b></p> <ul style="list-style-type: none"> <li>• Visual intrusion as a result of site establishment.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimize the visual impact of the activity on the surrounding environment through proper site management and implementing good housekeeping practices.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>• Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>• Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul>	<p>Applicable throughout Planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• Daily compliance monitoring by site management.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Contain prospecting to the boundaries of the authorised area.</li> <li>Ensure that the site have a neat appearance and is kept in good condition at all times.</li> <li>Limit vegetation removal, and only strip topsoil immediately prior to the use of a specific area.</li> <li>Rehabilitate and level the site upon closure to ensure that the visual impact on the aesthetic value of the area is kept to a minimum.</li> </ul>	<ul style="list-style-type: none"> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>
<ul style="list-style-type: none"> <li>Closing of drill holes and landscaping upon closure of the prospecting area.</li> </ul>	<p><b><u>Geology and Soil:</u></b></p> <ul style="list-style-type: none"> <li>Erosion rehabilitation after</li> </ul>	<ul style="list-style-type: none"> <li>Erosion control infrastructure (if necessary)</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>As mentioned earlier, the applicant will not remove any topsoil due to the fast mobility of the drill rig. The boreholes will be capped with sand material from around the boreholes, and the area rehabilitated as they move to the next borehole. The following standard mitigation measure will be adhered to in the event of any possible removal of topsoil:</li> <li>Strip and stockpile the upper 300 mm of the soil.</li> <li>Carefully manage and conserve the topsoil throughout the stockpiling and rehabilitation process.</li> <li>Ensure topsoil stripping, stockpiling and re-spreading is done in a systematic way. Plan</li> </ul>	<p>Applicable throughout Planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<p>prospecting in such a way that topsoil is stockpiled for the minimum possible time.</p> <ul style="list-style-type: none"> <li>• Place topsoil heaps on a levelled area within the prospecting footprint area. Do not stockpile topsoil in undisturbed areas.</li> <li>• Protect topsoil stockpiles against losses by water and wind erosion. Position stockpiles so as not to be vulnerable to erosion by wind and water. Establishment of plants on the stockpiles will help prevent erosion.</li> <li>• Ensure that topsoil heaps do not exceed 1.5 m in order to preserve micro-organisms within the topsoil, which can be lost due to compaction and lack of oxygen.</li> <li>• Keep temporary stockpiles free of invasive plant species.</li> <li>• Divert storm- and runoff water around the stockpile area to prevent erosion.</li> <li>• Spread the topsoil evenly over the rehabilitated area, to a depth of 300 mm, upon closure of the site.</li> <li>• Strive to re-instate topsoil at a time of the year when vegetation cover can be established as quickly as possible afterwards, to that erosion of returned topsoil is minimized. The best time of year is at the end of the rainy season.</li> <li>• Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.</li> </ul>	
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> <li>• Closing of drill holes and landscaping</li> </ul>	<p><b><u>Groundcover:</u></b></p> <ul style="list-style-type: none"> <li>• Impact of the natural vegetation of the footprint.</li> </ul>	<ul style="list-style-type: none"> <li>• Stay within the demarcated area.</li> <li>• Declare sensitive areas as no-go areas.</li> </ul>	<p><b><u>Role:</u></b></p> <ul style="list-style-type: none"> <li>• Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPR.</li> <li>• Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul>	<p>Applicable throughout Planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• Daily compliance monitoring by site management.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
upon closure of the prospecting area	<ul style="list-style-type: none"> <li>Impact of the natural vegetation of the footprint during decommissioning phase</li> <li>Loss of habitat within the footprint</li> </ul>	<ul style="list-style-type: none"> <li>Designated team to cut or pull-out invasive plant species that germinated on site.</li> <li>Herbicide application equipment.</li> </ul>	<p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Preparation of the drilling site must avoid damage to the vegetation as far as is possible.</li> <li>The size of the drilling sites must be restricted to a practical minimum and must be approved by the landowner and ECO. Once decided, the boundary of the site must be demarcated with a temporary fence.</li> <li>An invasive plant species management plan (Appendix J) must be implemented at the site to ensure the management and control of all species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto). Weed/alien clearing must be done on an ongoing basis throughout the life of the prospecting activities.</li> <li>All stockpiles (topsoil) must be kept free of invasive plant species.</li> <li>Management must take responsibility to control declared invader or exotic species on the rehabilitated areas. The following control methods can be used: <ul style="list-style-type: none"> <li>The plants can be uprooted, felled or cut off and can be destroyed completely.</li> <li>The plants can be treated chemically by a registered pest control officer (PCO) through the use of an herbicide recommended for use by the PCO in accordance with the directions for the use of such an herbicide.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<u>Fauna:</u>	<ul style="list-style-type: none"> <li>Toolbox talks to educate employees how to handle</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> </ul>	Applicable throughout planning and surface sampling phase -, and operational phases.

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
	<ul style="list-style-type: none"> <li>Potential impact on fauna (terrestrial) within the footprint area.</li> </ul>	<ul style="list-style-type: none"> <li>fauna that enter the work areas.</li> <li>Minimal staff should be considered at the prospecting site to minimise additional noise disturbance.</li> <li>Implement an avifauna monitoring program during the prospecting</li> </ul>	<ul style="list-style-type: none"> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Ensure no fauna is caught, killed, harmed, sold or played with.</li> <li>Instruct workers to report any animals that may be trapped in the working area.</li> <li>Ensure no snares are set or nests raided for eggs or young.</li> <li>Prospecting areas should be done in consultation with the landowner in order to ensure the safety and security of animals that might occur in the prospecting areas.</li> <li>All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limit (40 km/h), to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.</li> </ul>	<ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<p><u>Air Quality:</u></p> <ul style="list-style-type: none"> <li>Dust nuisance as a result of the prospecting activities.</li> </ul>	<ul style="list-style-type: none"> <li>Dust suppression equipment such as a water car.</li> <li>Signage that clearly reduce the speed on the access roads.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPR.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Control the liberation of dust into the surrounding environment by the use of; inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB's (e.g. DAS products).</li> </ul>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>



SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<ul style="list-style-type: none"> <li>• Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.</li> <li>• Limit speed on the haul roads to 40 km/h to prevent the generation of excess dust.</li> <li>• Minimise areas devoid of vegetation.</li> <li>• Take weather conditions into consideration upon commencement of daily operations. Limit operations during very windy periods to reduce airborne dust and resulting impacts.</li> <li>• Ensure dust generating activities comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM: AQA, 2004 and ASTM D1739 (SANS 1137:2012).</li> <li>• Implement best practice measures during the stripping of topsoil, loading, and transporting of material from site to minimize potential dust impacts.</li> </ul>	
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> </ul>	<p><b><u>Noise Ambiance:</u></b></p> <ul style="list-style-type: none"> <li>• Noise nuisance as a result of surface sampling.</li> </ul>	<ul style="list-style-type: none"> <li>• Silencers fitted to all project related vehicles, and the use of vehicles that are in road worthy condition in terms of the National Road Traffic Act, 1996.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>• Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>• Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>• Ensure that employees and staff conduct themselves in an acceptable manner while on site.</li> <li>• No loud music may be permitted at the prospecting area.</li> <li>• Ensure that all project related vehicles are equipped with silencers and maintained in a</li> </ul>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• Daily compliance monitoring by site management.</li> <li>• Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<p>road worthy condition in terms of the National Road Traffic Act, 1996.</p> <ul style="list-style-type: none"> <li>Implement best practice measures to minimise potential noise impacts.</li> <li>Noise generated on-site from all the proposed activities must comply with the Northern Cape Noise Control Regulations Provincial Notice 200/2013</li> </ul>	
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> <li>Closing of drill holes and landscaping upon closure of the prospecting area</li> </ul>	<p><b>Waste Management:</b></p> <ul style="list-style-type: none"> <li>Potential hydrocarbon contamination from leaks or spills</li> <li>Potential impact associated with litter/hydrocarbon spills left at the decommissioning activities.</li> </ul>	<ul style="list-style-type: none"> <li>Oil spill kit.</li> <li>Sealed drip trays.</li> <li>Formal waste disposal system with waste registers.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPR.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Provision must be made for proper retention of all garbage, domestic wastes, and drilling wastes. Bins with lids or skips must be provided and these must be emptied at an approved disposal site. No refuse of any sort may be buried or burned at the site.</li> <li>Fuels and oils must be held in leak-free containers and must be kept on drip trays when not in use.</li> <li>Waste oils and the like, including items such as used oil filters and oil-soaked paper or rags, must be retained in sealed containers and be kept on drip trays.</li> <li>Vehicles and machines must be refuelled or serviced over drip trays. Any soil contaminated by fuel or oil spills must be collected and be held in a suitable sealed container prior to</li> </ul>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<p>removal to an approved disposal site. A hazmat kit of appropriate capacity must be kept on the site at all times.</p> <ul style="list-style-type: none"> <li>• On completion of drilling operations at each site, all materials, including wastes or litter, must be removed for re-use at another site or for disposal as may be relevant. The site must be cleaned and tidied and its condition must be approved by the landowner before the contractor may leave the site.</li> <li>• Provide ablution facilities in the form of a chemical toilet that is placed outside the 1:100-year flood line of any open water source. Ensure the toilet is serviced at least once every two weeks for the duration of the prospecting activities.</li> <li>• Ensure that the use of any temporary, chemical toilet facilities does not cause any pollution to water sources or pose a health hazard. In addition, ensure that no form of secondary pollution arise from the disposal of refuse or sewage from the temporary, chemical toilets. Address any pollution problems arising from the above immediately.</li> <li>• Equip the diesel bowser with a drip tray if used on site. The nozzle of the bowser must rest in a sleeve to prevent dripping after refuelling.</li> <li>• Clean drip trays after use. Do not use dirty drip trays.</li> <li>• Keep a spill kit on site.</li> <li>• Collect any effluents containing oil, grease or other industrial substances in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility.</li> </ul>	

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<ul style="list-style-type: none"> <li>Collect the contaminated soil from spillage that occurred, such as oil or diesel leaking from a burst pipe, within the first hour of occurrence, in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognized facility. File proof.</li> <li>Compile a waste management plan and implement it on site. The plan must focus on the waste hierarchy of the NEM: WA.</li> <li>Contain general waste in marked, sealable, refuse bins placed at a designated area and remove waste from the prospecting area to a recognised general waste landfill site.</li> <li>Prevent the burning or burying of waste on site.</li> <li>Report any significant spillage of chemicals, fuels etc. during the lifespan of the prospecting activities to the Department of Water and Sanitation and other relevant authorities.</li> <li>Park the drill machinery at the prospecting area with drip trays placed underneath stationary vehicles.</li> </ul>	
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on areas/infrastructure of heritage or cultural concern.</li> </ul>	<ul style="list-style-type: none"> <li>Contact number of an archaeologist that can be contacted when a discovery is made on site.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Confine all prospecting to the development footprint area.</li> <li>Once the drill sites have been confirmed these areas have to be subjected to a heritage walk</li> </ul>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<p>down, this should be conducted prior to the commencement of prospecting activities.</p> <ul style="list-style-type: none"> <li>• Implement the following change find procedure when discoveries are made on site:                             <ul style="list-style-type: none"> <li>▪ If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.</li> <li>▪ It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find and confirm the extent of the work stoppage in that area.</li> <li>▪ The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify SAHRA.</li> <li>▪ Work may only continue once the go-ahead was issued by SAHRA.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Planning and surface sampling phase</li> </ul>	<p><b><u>Hydrology:</u></b></p> <ul style="list-style-type: none"> <li>• Storm water management</li> </ul>	<ul style="list-style-type: none"> <li>• Storm water management structures such as berms to direct storm- and runoff water around the stockpiled topsoil area (when and if applicable).</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>• Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPR.</li> <li>• Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p>	<p>Applicable throughout planning and surface sampling phase -, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• Daily compliance monitoring by site management.</li> <li>• Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<ul style="list-style-type: none"> <li>• Conduct activity in terms of the Best Practice Guidelines for small-scale mining as developed by DWSJ.</li> <li>• No drilling should be undertaken at times when rain has fallen, and the pans are holding water. This measure is recommended to both minimise the possibility of contamination of the surface and ground water, and to minimise disturbance of the important bird populations around the pans.</li> <li>• The access to the site must be planned together with the relevant landowner and be approved by the landowner.</li> <li>• The landowner may stop operations at any site if the conditions of the approval are ignored or otherwise bypassed.</li> <li>• Access roads and tracks must make use as far as is possible of existing farm roads and tracks. Ideally, the routes will be approved and documented by an Environmental Control Officer (ECO).</li> <li>• To the greatest possible extent, the access roads and tracks must avoid passing through watercourses or pans or other environmentally sensitive areas. Such areas could include known home ranges of species of especial biodiversity conservation concern.</li> <li>• Preparation of the drilling site must avoid damage to the vegetation as far as is possible.</li> <li>• The size of the drilling sites must be restricted to a practical minimum and must be approved by the landowner and ECO.</li> <li>• If needed, a lay-down area for pipes may be established close by the drilling site but its boundary must also be demarcated.</li> </ul>	

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<ul style="list-style-type: none"> <li>Any roads or tracks that were prepared or used for access to the site must be returned to their prior state and their condition must be approved by the landowner.</li> </ul>	
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<p><b>Existing Infrastructure:</b></p> <ul style="list-style-type: none"> <li>Deterioration of the access road to the prospecting area.</li> </ul>	<ul style="list-style-type: none"> <li>Grader to restore the road surface when and if applicable.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Divert storm water around the access road to prevent erosion.</li> <li>Access roads and tracks must make use as far as is possible of existing farm roads and tracks. Ideally, the routes will be approved and documented by an Environmental Control Officer (ECO).</li> <li>Repair rutting and erosion of the access road caused as a direct result of the prospecting activities.</li> </ul>	<p>Applicable throughout operational phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>
<ul style="list-style-type: none"> <li>Planning and surface sampling phase</li> </ul>	<ul style="list-style-type: none"> <li>Potential impact on the Safety of the area due to increased human concentration</li> </ul>	<ul style="list-style-type: none"> <li>Enhance security at the entrance</li> <li>Stocked first aid box.</li> <li>Level 1 certified first aider.</li> <li>All appointments in terms of the Mine Health and Safety Act, 1996.</li> </ul>	<p><u>Role:</u></p> <ul style="list-style-type: none"> <li>Site Manager to ensure day-to-day compliance with the guidelines as stipulated in the EMPr.</li> <li>Compliance to be monitored by the independent Environmental Control Officer during the annual environmental audit.</li> </ul> <p><u>Responsibility:</u></p> <ul style="list-style-type: none"> <li>Ensure adequate ablution facilities and water for human consumption is daily available on site.</li> </ul>	<p>Applicable throughout planning and surface sampling phase, operational-, and decommissioning phases.</p> <ul style="list-style-type: none"> <li>Daily compliance monitoring by site management.</li> <li>Annual compliance monitoring of site by an Environmental Control Officer.</li> </ul>

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
			<ul style="list-style-type: none"><li>• Ensure that workers have access to the correct PPE as required by law.</li><li>• Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).</li></ul>	



**l) Indicate the frequency of the submission of the performance assessment/environmental audit report.**

The Environmental Audit Report in accordance with Appendix 7 as prescribed in Regulation 34 of the EIA Regulations, 2014 (as amended) will annually be submitted to DMRE for compliance monitoring purposes or in accordance with the time period stipulated by the Environmental Authorisation.

**m) Environmental Awareness Plan**

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

Once the Applicant received the prospecting right and may commence with the proposed activity, a copy of the Environmental Management Programme will be handed to the site manager for his perusal. Issues such as the prospecting boundaries, fire principals and waste handling will be discussed.

An induction meeting will be held with all the site workers to inform them of the Basic Rules of Conduct with regard to the environment.

**ii) Manner in which risk will be dealt with in order to avoid pollution or the degradation of the environment.**

The operations manager must ensure that he/she understands the EMPR document and its requirement and commitments before any prospecting takes place. An Environmental Control Officer needs to check compliance of the prospecting activity to the management programmes described in the EMPR.

The following list represents the basic steps towards environmental awareness, which all participants in this project must consider whilst carrying out their tasks.

- **Site Management:**
  - Stay within boundaries of site – do not enter adjacent properties.
  - Keep tools and material properly stored.
  - Smoke only in designated areas.
  - Use toilets provided – report full or leaking toilets.

- **Water Management and Erosion:**
  - Check that rainwater flows around work areas and are not contaminated.
  - Report any erosion.
  - Check that dirty water is kept from clean water.
  
- **Waste Management:**
  - Take care of your own waste
  - Keep waste separate into labelled containers – report full bins.
  - Place waste in containers and always close lid.
  - Don't burn waste.
  - Pick-up any litter laying around.
  
- **Hazardous Waste Management (Petrol, Oil, Diesel, Grease)**
  - Never mix general waste with hazardous waste.
  - Use only sealed, non-leaking containers.
  - Keep all containers closed and store only in approved areas.
  - Always put drip trays under vehicles and machinery.
  - Empty drip trays after rain.
  - Stop leaks and spills, if safe:
    - ✓ Keep spilled liquids moving away.
    - ✓ Immediately report the spill to the site manager/supervision.
    - ✓ Locate spill kit/supplies and use to clean-up, if safe.
    - ✓ Place spill clean-up wastes in proper containers.
    - ✓ Label containers and move to approved storage area.
  
- **Discoveries:**
  - Stop work immediately.
  - Notify site manager/supervisor.
  - Includes – archaeological finds, cultural artefacts, contaminated water, pipes, containers, tanks and drums, any buried structures.
  
- **Air Quality:**
  - Wear protection when working in very dusty areas.
  - Implement dust control measures:
    - ✓ Water all roads and work areas.

- ✓ Minimize handling of material.
- ✓ Obey speed limit and cover trucks.

- **Driving and Noise:**

- Use only approved access roads.
- Respect speed limits.
- Only use turn-around areas – no crisscrossing through undisturbed areas.
- Avoid unnecessary loud noises.
- Report or repair noisy vehicles.

- **Vegetation and Animal life:**

- Do not remove any plants or trees without approval of the site manager.
- Do not collect firewood.
- Do not catch, kill, harm, sell or play with any animal, reptile, bird or amphibian on site.
- Report any animal trapped in the work area.
- Do not set snares or raid nests for eggs or young.

- **Fire Management:**

- Do not light any fires on site, unless contained in a drum at demarcated area.
- Put cigarette butts in a rubbish bin.
- Do not smoke near gas, paints or petrol.
- Know the position of firefighting equipment.
- Report all fires.
- Don't burn waste or vegetation.

**n) Specific information required by the Competent Authority**

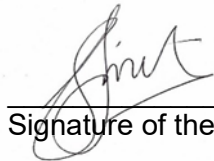
(Among others, confirm that the financial provision will be reviewed annually)

The Applicant undertakes to annually review and update the financial provision calculation, upon which it will be submitted to DMRE for review and approved as being sufficient to cover the environmental liability at the time and for closure of the mine at that time.

### 5. UNDERTAKING

The EAP herewith confirms.

- a) the correctness of the information provided in the reports.
- b) the inclusion of comments and inputs from stakeholders and I&AP's
- c) the inclusion of inputs and recommendations from the specialist reports where relevant,   
and
- d) that the information provided by the EAP to interested and affected parties and any response by the EAP to comments or inputs made by interested and affected parties are correctly reflected herein



Signature of the environmental assessment practitioner:

Greenmined Environmental (Pty) Ltd

Name of Company:

31 January 2025

Date:

**-END-**

# APPENDIX A

## REGULATION 2(2) MINE MAP



# APPENDIX B

## LOCALITY AND LANDUSE MAP



# APPENDIX C

## PROSPECTING ACTIVITIES PLAN



# APPENDIX D

## REHABILITATION CLOSURE MAP





# APPENDIX E

## PROOF OF PUBLIC PARTICIPATION



# APPENDIX F1

## SUPPORTING IMPACT ASSESSMENT



# APPENDIX F2

# SITE VERIFICATION REPORT



# APPENDIX G

## PHOTOGRAPHS OF THE SITE



# APPENDIX H

## DMRE ACCEPTANCE AND ACKNOWLEDGEMENT LETTERS



# APPENDIX I

## CV AND EXPERIENCE RECORD OF EAP



# APPENDIX J

## INVASIVE PLANT SPECIES MANAGEMENT PLAN



# APPENDIX K

# CLOSURE REHABILITATION PLAN





# APPENDIX L SCREENING REPORT



# APPENDIX M

# PROSPECTING WORK PROGRAMME



# APPENDIX N AMENDED ENVIRONMENTAL APPLICATION FORM

