

**MINING AREA ON A PORTION OF PORTION 31 OF THE REMAINING
EXTENT OF THE FARM DRIEFONTEINEN 243, REGISTRATION
DIVISION OF MOSSEL BAY, WESTERN CAPE PROVINCE**

**ENVIRONMENTAL RISK REPORT
(MPRDA REGULATION 60 & NEMA GN 940)**

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**CLOSURE PLAN
(MPRDA REGULATION 62 & NEMA GN 940)**

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**FINAL PERFORMANCE ASSESSMENT REPORT
(MPRDA REGULATION 55 & NEMA REGULATION 34)**

| | |
|----------------------------|-------------------------------|
| PERMIT NUMBER: | 05/2021 |
| REFERENCE NUMBER: | WC 30/5/1/3/2/10258 MP |
| CLOSURE REPORT DATE | NOVEMBER 2025 |

Prepared For:

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CLOSURE APPLICATION – MOSSEL BAY (WC 10258 MP)

FINAL PERFORMANCE ASSESSMENT REPORT


MPRDA Regulation 55 (9) & NEMA Regulation 34

PROJECT DETAIL

| | | | |
|---------------------------------------|--|------------------------------|---------------|
| Permit Number: | WC 30/5/1/3/2/10258 MP | Report Date: | November 2025 |
| Site Name: | Mossel Bay | Report Number: | 04 |
| Contractor: | Haw and Inglis Civil Engineering (Pty) Ltd | Other Authorisations: | None |
| Environmental Control Officer: | Zoë Norval | | |

DETAIL OF AUDITOR

(APPENDIX 7 SUB-REGULATION 3(A) & (B))

| | |
|-------------------------------------|--|
| ECO: | Zoë Norval |
| Expertise: | Ms Z. Norval has a Bsc degree in Environmental Science and an Honours degree in Botany. In her Honours year, she focused mainly on environmental assessments and geographic information systems. Her expertise comprises a range of assisting senior consultants with environmental services, Environmental Control and Environmental Performance Assessments / Compliance Audits, preparation of environmental related documentation, Mining Right and Permit applications and applications for Environmental Authorisations |
| Declaration of independence: | <p>I, Zoë Norval, in my capacity as environmental control officer declare that–</p> <ul style="list-style-type: none">• I act as independent environmental control officer in this compliance audit;• I will perform the work relating to the audit in an objective manner, even if the results and findings are not favourable to the holder of the authorisation;• I have expertise in conducting environmental compliance audits, including knowledge of the Act and regulations that have relevance to the activity;• I will adhere to and comply with all responsibilities as indicated in the National Environmental Management Act and Environmental Impact Assessment Regulations.• I do not have and will not have any vested interest in the activity other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014.  <p>Zoë Norval</p> <p>Date: November 2025</p> |

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SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT

(APPENDIX 7 SUB-REGULATION 3(C))

This final performance assessment / environmental audit report (FPAR) was compiled in terms of the requirements of the NEMA EIA Regulations, 2014 (as amended).

OBJECTIVE:

The objective of the FPAR is to evaluate compliance of the mining area with the environmental management plan (EMP) and mining permit (MP) as approved by the Department of Mineral and Petroleum Resources. It also stipulates the mechanisms for monitoring compliance with, and performance assessment against the closure plan and reporting thereof.

ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE

(APPENDIX 7 SUB-REGULATION 3(F))

The assumptions made in this document, stem from background- and site-specific information received from the permit holder.

LOCATION

| | | |
|--------------------------|--|----------------------------------|
| Site Location: | Access to the mining permit area is ± 22.47km west of Mossel Bay. Using the N2, head west for approximately 22.47km. The entrance to the proposed mining area is found on the left of the road | |
| Site Coordinates: | A 34.180768°S; 21.894673°E | A 34°10'50.765"S; 21°53'40.823"E |
| | B 34.182262°S; 21.894542°E | B 34°10'56.143"S; 21°53'40.351"E |
| | C 34.182071°S; 21.891307°E | C 34°10'55.456"S; 21°53'28.705"E |
| | D 34.180587°S; 21.891401°E | D 34°10'50.113"S; 21°53'29.044"E |
| | A 34.180768°S; 21.894673° | A 34°10'50.765"S; 21°53'40.823"E |

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Site Layout:



Figure 1: Satellite view of the approved mining area (white polygon), where no mining activities have been undertaken to date by the permit holder. The yellow polygon indicates the area of previous mining activities where no rehabilitation has occurred (0.85 ha) from the previous mining licence holder. Image obtained from Google Earth.

PROJECT DESCRIPTION:

The Department of Mineral and Petroleum Resources (DMPR) issued Mining Permit WC 30/5/1/3/2/10258 MP on 12 March 2021. The permit covers a 5-hectare area previously disturbed by mining activities. Despite receiving the permit, the holder has not commenced with any mining operations to date.

The permit remains valid until 11 March 2026; however, the permit holder has opted to close operations prematurely. As no legal mining activities were initiated, no on-site rehabilitation measures were required or undertaken. A photographic report is provided in Appendix 5, illustrating site conditions (2019) prior to the issuance of the mining permit as well as a sworn affidavit affirming under oath that the permit holder has never accessed or conducted any activities on the mining site (Appendix 6).

REPORTABLE ENVIRONMENTAL INCIDENTS

| | |
|-----------------|-----------------|
| Incident date: | None to report. |
| Incident no: | |
| Incident: | |
| How addressed: | |
| When addressed: | |

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ADOPTED METHODOLOGY **(APPENDIX 7 SUB-REGULATION 3(D))**

| COMPLIANCE SCORE | DESCRIPTION |
|-------------------------|---|
| 1 | Task not achieved |
| 2 | Task 20% achieved |
| 3 | Task 50% achieved |
| 4 | Task 80% achieved |
| 5 | Task 100% achieved in accordance with the EMP |

| NON-COMPLIANCE SCORE | DESCRIPTION |
|-----------------------------|---|
| 1 | LOW – Mitigation not needed / mitigation measures to be maintained |
| 2 | MEDIUM – Mitigation should be considered |
| 3 | HIGH – Mitigation compulsory |

INSPECTION ASPECTS

| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|---|------------------|----------------------|------------|--|
| LEGISLATION COMPLIANCE: | | | | |
| Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) | 5 | 1 | Compliant. | A mining permit was granted in 2021, but the permit holder did not commence operations. This application is submitted to initiate the formal closure process of the mining area. |
| Mining Permit available on site | 5 | 1 | Compliant. | The mining permit and EMP were kept at the office of the holder. |
| National Water Act, (Act No. 36 of 1998) | N/A | N/A | N/A | N/A |
| National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2010 | 5 | 1 | Compliant. | The permit holder obtained an Environmental Authorisation (EA) as part of the mining permit application. |
| Environmental Conservation Act, 1989 (Act 73 of 1989) | 5 | 1 | Compliant. | - |
| Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) | 5 | 1 | Compliant. | |
| Copy of the EA and EMPR available on site | 5 | 1 | Compliant | The EA was kept at the office of the holder. |
| National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) | N/A | N/A | N/A | N/A |
| National Environmental Management Act: Biodiversity Act, 2004 (Act No. 10 of 2004) | N/A | N/A | N/A | N/A |
| National Environmental Management: Waste Act, 2008 (Act No 59 of 2008) | N/A | N/A | N/A | N/A |
| Occupational Health and Safety Act. 1993 (Act No.85 of 1993) | N/A | N/A | N/A | N/A |
| Mine Health and Safety Act, 1996 (Act No. 29 of 1996) | N/A | N/A | N/A | N/A |
| ASPECTS OF THE AFFECTED ENVIRONMENT | | | | |
| TOPSOIL MANAGEMENT | | | | |
| Topsoil should be removed and stored at a demarcated and signposted stockpile area within the mining permit area. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|--|-------------------------|-----------------------------|---------------|-----------------|
| Stockpiling of topsoil must be done to protect it from erosion, mixing with overburden or other material. The topsoil must be used to cover the rehabilitated area and improve the establishment of natural vegetation. | | | | |
| The temporary topsoil stockpiles should be kept free of weeds. | N/A | N/A | N/A | N/A |
| Topsoil heaps should not exceed 2m in order to preserve micro-organisms within the topsoil, which can be lost due to compaction and lack of oxygen. | N/A | N/A | N/A | N/A |
| Storm- and runoff water should be diverted around the stockpile area and access roads to prevent erosion. | N/A | N/A | N/A | N/A |
| FAUNA AND FLORA | | | | |
| A weed and invader plant control management plan must be implemented at the site to ensure eradication of all listed invader plants in terms of Conservation of Agricultural Act (Act No 43 1983). | N/A | N/A | N/A | N/A |
| <p>Management must take responsibility to control declared invader or exotic species on the rehabilitated areas. The following control methods can be used:</p> <ul style="list-style-type: none"> • "The plants can be uprooted, felled or cut off and can be destroyed completely." • "The plants can be treated with an herbicide that is registered for use in connection therewith and in accordance with the directions for the use of such an herbicide." | N/A | N/A | N/A | N/A |
| The temporary topsoil stockpiles needs to be kept free of weeds. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|--|------------------|----------------------|--------|----------|
| The site manager should ensure that no fauna is caught, killed, harmed, sold or played with. | N/A | N/A | N/A | N/A |
| Workers should be instructed to report any animals that may be trapped in the working area. | N/A | N/A | N/A | N/A |
| No snares may be set or nests raided for eggs or young. | N/A | N/A | N/A | N/A |
| No plants or trees may be removed without the approval of the ECO. | N/A | N/A | N/A | N/A |
| AIR QUALITY AND NOISE | | | | |
| The liberation of dust into the surrounding environment must be effectively controlled by the use of, inter alia, water spraying and/or other dust-allaying agents. | N/A | N/A | N/A | N/A |
| The site manager must ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression. | N/A | N/A | N/A | N/A |
| Speed on the access roads must be limited to 40km/h to prevent the generation of excess dust. | N/A | N/A | N/A | N/A |
| Roads must be sprayed with water or an environmentally friendly dust-allaying agent that contains no PCB's (e.g. DAS products) if dust is generated above acceptable limits. | N/A | N/A | N/A | N/A |
| The applicant must ensure that employees and staff conduct themselves in an acceptable manner while on site. | N/A | N/A | N/A | N/A |
| All mining vehicles must be equipped with silencers and maintained in a road worthy condition in terms of the Road Transport Act. | N/A | N/A | N/A | N/A |
| Plan the type, duration and timing of the blasting procedures with due cognisance of other land users and structures in the vicinity and notify surrounding land owners prior to blasting occasions. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|---|------------------|----------------------|--------|----------|
| SURFACE AND STORM WATER MANAGEMENT | | | | |
| Storm water must be diverted around the topsoil heaps, stockpile areas and access roads to prevent erosion and loss of material. | N/A | N/A | N/A | N/A |
| Surface slope maintained to ensure that excavation is freely drained and prevents ponding of water on the surface. | N/A | N/A | N/A | N/A |
| Runoff water must also be diverted around the stockpile areas with trenches and contour structures to prevent erosion of the work areas. | N/A | N/A | N/A | N/A |
| Mining must be conducted only in accordance with the Best Practice Guideline for small scale mining that relates to storm water management, erosion and sediment control and waste management, developed by the Department of Water Affairs (DWA), and any other conditions which that Department may impose: | N/A | N/A | N/A | N/A |
| All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed. | N/A | N/A | N/A | N/A |
| Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition. | N/A | N/A | N/A | N/A |
| Clean water (e.g. rainwater) must be kept clean and be routed to a natural watercourse by a system separate from the dirty water system. You must prevent clean water from running or spilling into dirty water systems. | N/A | N/A | N/A | N/A |
| Runoff water must also be diverted around the stockpile areas with trenches and contour structures to prevent erosion of the work areas. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|---|------------------|----------------------|--------|----------|
| Dirty water must be prevented from spilling or seeping into clean water systems. | N/A | N/A | N/A | N/A |
| The storm water management plan must apply for the entire life cycle of the mine and over different hydrological cycles (rainfall patterns). | N/A | N/A | N/A | N/A |
| Ensure that water from the wash bay into the oil sump | N/A | N/A | N/A | N/A |
| VISUAL EXPOSURE | | | | |
| The site needs to have a neat appearance and be kept in good condition at all times. | N/A | N/A | N/A | N/A |
| Upon closure, the site needs to be rehabilitated and sloped to insure that the visual impact on the aesthetic value of the area is kept to a minimum. | N/A | N/A | N/A | N/A |
| All mining activities must take place within the boundaries of the site. | N/A | N/A | N/A | N/A |
| MINING ACTIVITIES | | | | |
| MANAGEMENT OF FUEL AND HYDROCARBON PRODUCT | | | | |
| Hazardous material stored within a bunded area | N/A | N/A | N/A | N/A |
| Management of fuel and oil spills | N/A | N/A | N/A | N/A |
| Drip trays present when refuelling is done outside the service bay | N/A | N/A | N/A | N/A |
| Sump and oil separator operational | N/A | N/A | N/A | N/A |
| WASTE MANAGEMENT | | | | |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|---|------------------|----------------------|--------|----------|
| Waste minimization implemented through incorporating waste avoidance, reduction, recycling, treat, reuse and disposal where appropriate | N/A | N/A | N/A | N/A |
| No processing area or waste pile may be established within 100m of the edge of any river channel or other water bodies. | N/A | N/A | N/A | N/A |
| Any vehicle repairs may only take place within the service bay area (bund area) and all waste products must be disposed of in a 200 litre closed container/bin found inside the emergency service area. | N/A | N/A | N/A | N/A |
| The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site. | N/A | N/A | N/A | N/A |
| 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 recognised facility. | N/A | N/A | N/A | N/A |
| Spills must be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility. | N/A | N/A | N/A | N/A |
| An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillage etc) that occur on site must be developed. | N/A | N/A | N/A | N/A |
| Suitable covered receptacles must be available at all times and conveniently placed for the disposal of waste. | N/A | N/A | N/A | N/A |
| Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., must be stored in an animal-proof container with a closable lid at a collecting point and collected on a regular basis and disposed of at a recognised landfill site. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|--|------------------|----------------------|--------|----------|
| Specific precautions should be taken to prevent refuse from being dumped on or in the vicinity of the mine area. | | | | |
| No waste must be disposed of through burying, burning, dumped or deposited on the adjacent properties or public places and open spaces. | N/A | N/A | N/A | N/A |
| Spillage of petrochemical products must be avoided. In the case of accidental spillage, contaminated soil must be removed for bioremediation or disposed of at a facility for the substance concerned. Disturbed land must be rehabilitated and seeded with vegetation seed naturally occurring on site to the satisfaction of the DMRE and DWS. | N/A | N/A | N/A | N/A |
| Biodegradable refuse generated must be handled as indicated above. | N/A | N/A | N/A | N/A |
| Ablution facilities must be provided with a ratio 1 for every 15 workers and placed in a manner to prevent spills and leaks and maintained according to the operating instruction and must be disposed of at an authorised waste water treatment works. | N/A | N/A | N/A | N/A |
| POTABLE WATER AND ABLUTION FACILITIES | | | | |
| Ablution facilities available on site more than 200m from a watercourse | N/A | N/A | N/A | N/A |
| Potable water available on site for use of workers | N/A | N/A | N/A | N/A |
| FIRE MANAGEMENT | | | | |
| Fire-fighting equipment that are in good working conditions must be available at all times for their usage during the occurrence of accidental fires. | N/A | N/A | N/A | N/A |
| No open fires at mining site allowed | N/A | N/A | N/A | N/A |
| Workers must be adequately trained in the handling of firefighting equipment | N/A | N/A | N/A | N/A |
| Smoking must be prohibited in the vicinity of flammable substances. | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|--|------------------|----------------------|--------|----------|
| Cooking and heating fires must be permitted only in designated areas with appropriate safety measures. | N/A | N/A | N/A | N/A |
| MINING ACTIVITY/ EQUIPMENT MANAGEMENT | | | | |
| All mining earth-moving equipment & vehicles operating within site boundaries preventing crisscrossing | N/A | N/A | N/A | N/A |
| Visible semi-permanent markers placed on the mining boundary | N/A | N/A | N/A | N/A |
| Mining equipment mechanically sound without visible oil leaks and a decrease in smoke discharge | N/A | N/A | N/A | N/A |
| Vehicle repairs only conducted in service bay area, and waste products disposed of in containers/bins | N/A | N/A | N/A | N/A |
| No excavation to occur below the level of the water table | N/A | N/A | N/A | N/A |
| Any sand or gravel leaving the site must be fully covered with tarpaulin cloth while being transported. | N/A | N/A | N/A | N/A |
| EMPLOYEE AND SAFETY MANAGEMENT | | | | |
| Workers should have access to the correct personal protection equipment (PPE) as required by law. | N/A | N/A | N/A | N/A |
| All operations should comply with the Occupational Health and Safety Act. | N/A | N/A | N/A | N/A |
| Workers inducted and informed of EMP conditions | N/A | N/A | N/A | N/A |
| No camping allowed on the mining area | N/A | N/A | N/A | N/A |
| Are there signs present, indicating the mining site about the hazard around the construction site and heavy vehicles and speed restrictions | N/A | N/A | N/A | N/A |
| Potentially hazardous area must be demarcated with danger tape | N/A | N/A | N/A | N/A |
| SITE SECURITY AND ACCESS CONTROL | | | | |
| Effective access control to the site to reasonably prevent unauthorised entry such as lockable gates and mining area fenced off. Signs indicating the risks involved in unauthorised entry must be displayed at the entrance | N/A | N/A | N/A | N/A |

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| DESCRIPTION | COMPLIANCE SCORE | NON-COMPLIANCE SCORE | STATUS | COMMENTS |
|--|------------------|----------------------|--------|----------|
| Newly constructed access roads (if applicable) must be adequately maintained so as to minimise dust, erosion or undue surface damage. | N/A | N/A | N/A | N/A |
| Necessary signage and traffic measures must be implemented for safe and convenient access to the site from the adjacent roads. | N/A | N/A | N/A | N/A |
| Storm water should be diverted around the access roads to prevent erosion. | N/A | N/A | N/A | N/A |
| Erosion of access road: Vehicular movement must be restricted to existing access routes to prevent crisscrossing of tracks through undisturbed areas. Rutting and erosion of the access road caused as a result of the mining activities should be repaired by the applicant. | N/A | N/A | N/A | N/A |
| Weatherproof, durable and legible notices in at least three official languages applicable in the area must be displayed at the entrance to the site. These notices must include: <ul style="list-style-type: none"> Hours of the operation Name Address Telephone number of the EA holder and site manager | N/A | N/A | N/A | N/A |
| EMERGENCY RESPONSE PLAN | | | | |
| Maintain and implement an emergency response plan with an annual review during the audit period and after major emergency and or major accident. The plan must, amongst others, include: <ul style="list-style-type: none"> Site fire Spillage Natural disasters (floods) Industrial action Contact details of police, ambulances and any emergency centre closer to the site | N/A | N/A | N/A | N/A |
| Emergency register available on site | N/A | N/A | N/A | N/A |

COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S
(APPENDIX 7 SUB-REGULATION 3(G) & (J))

No written complaints were received by the permit holder.

GENERAL REPORT

As previously stated, the Department of Mineral and Petroleum Resources (DMPR) issued Mining Permit WC 30/5/1/3/2/10258 MP on 12 March 2021. The permit covers a 5-hectare area previously disturbed by mining activities. Despite receiving the permit, the holder has not commenced with any mining operations to date.

The permit remains valid until 11 March 2026; however, the permit holder has opted to close operations prematurely. As no legal mining activities were initiated, no on-site rehabilitation measures were required or undertaken. A photographic report is provided in Appendix 5, illustrating site conditions (2019) prior to the issuance of the mining permit as well as a sworn affidavit affirming under oath that the permit holder has never accessed or conducted any activities on the mining site (Appendix 6).

DOCUMENT CHECKLIST:

All documents are kept at the permit holder's office as no mining activities were conducted.

MATTERS TO BE ADDRESSED POST CLOSURE:

None.

ABILITY OF EMP TO ADEQUATELY MANAGE OR MITIGATE ENVIRONMENTAL IMPACTS (APPENDIX 7 SUB-REGULATION 3(E):

No longer applicable as this report forms part of an application for a closure certificate to be submitted to DMPR.

NEED FOR AMENDMENT OF THE EMP:

None.

FINANCIAL PROVISION:

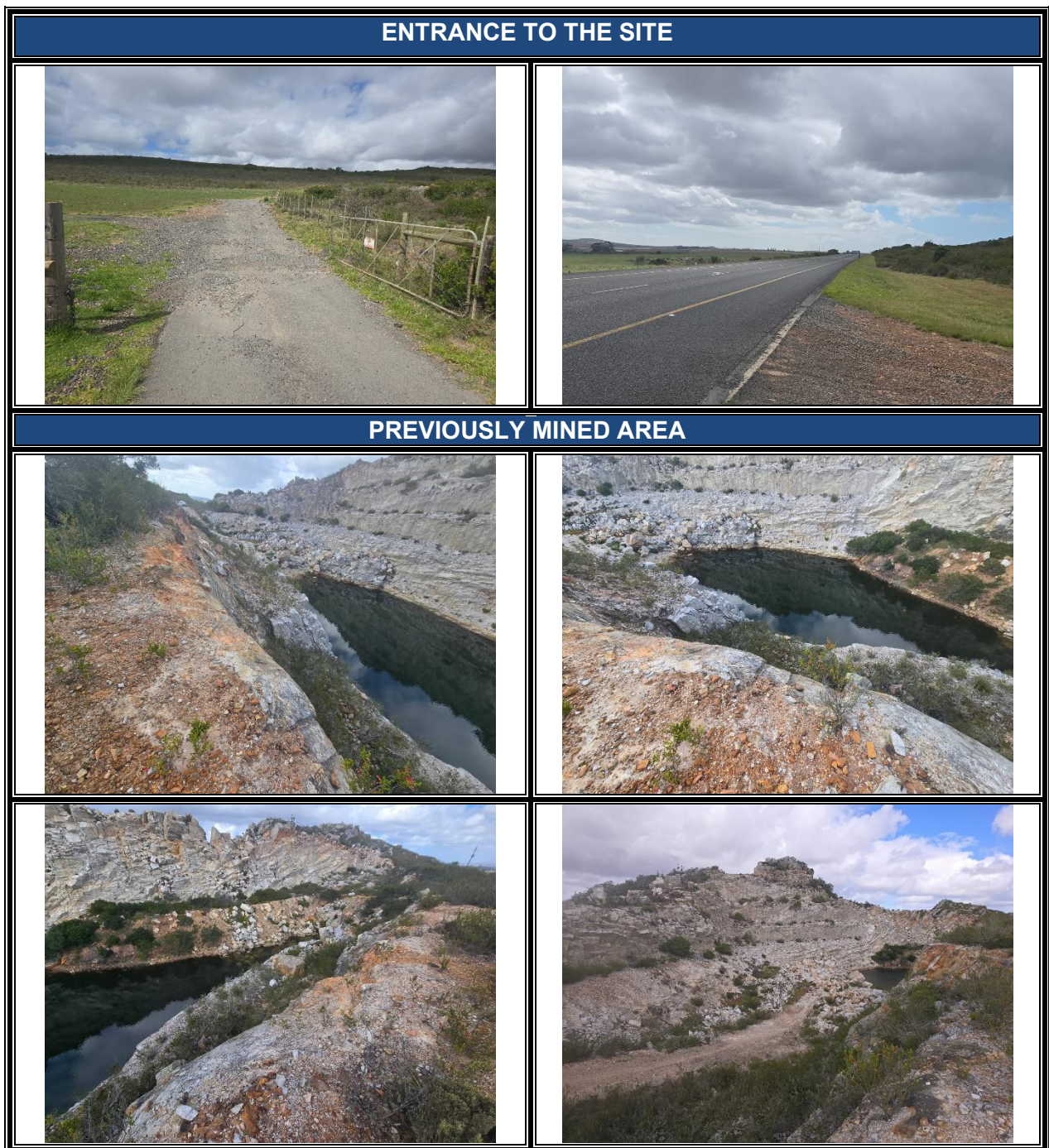
The mining permit holder has a financial guarantee to the value of R 601,827 lodged with the DMPR.

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ECO SIGNATURE

| NAME: | SIGNATURE: | DATE: |
|------------|---|---------------|
| Zoë Norval |  | November 2025 |

PHOTOGRAPHS:



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ENVIRONMENTAL RISK REPORT

MPRDA Regulation 60 & NEMA GN 940

| | | | |
|--------------------------------|--|-----------------------|---------------|
| Permit Number: | WC 30/5/1/3/2/10258 MP | Report Date: | November 2025 |
| Site Name: | Mossel Bay | Report Number: | 01 |
| Contractor: | Haw and Inglis Civil Engineering (Pty) Ltd | Other Authorisations: | None |
| Environmental Control Officer: | Zoë Norval | | |

1 REGULATION 60 (a): A undertaking of a screening level environmental risk assessment where – all possible environmental risks are identified, including those which appear to be insignificant;

1.1 Criteria of assigning significance to possible risks

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 risk
- ♣ 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 risk magnitude and risk significance. Risk magnitude is the measurable change (i.e. intensity, duration and likelihood). Risk significance is the value placed on the change by different affected parties (i.e. level of acceptability)

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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 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

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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.

Table 1 will be used to obtain an overall rating for severity, taking into consideration the various criteria.

Rating of Severity:

| 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 |

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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.

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.

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/neighboring 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.

Example of calculating Overall Consequence

| Consequence | Rating |
|--|---------------|
| Severity | Example 4 |
| Duration | Example 2 |
| Extent | Example 4 |
| SUBTOTAL | 10 |
| TOTAL CONSEQUENCE: (Subtotal divided by 3) | 3.3 |

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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.

Rating of Frequency:

| Rating | Description |
|--------|---|
| 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.

Rating of Probability

| Rating | Description |
|--------|---------------------------------------|
| 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.

Example of calculating Overall Likelihood

| Consequence | Rating |
|-------------------------|-----------|
| Frequency | Example 4 |
| Probability | Example 2 |
| SUBTOTAL | 6 |
| TOTAL LIKELIHOOD | 3 |

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| Consequence | Rating |
|-------------------------|---------------|
| (Subtotal divided by 2) | |

Determination of Overall Environmental Significance:

The multiplication of overall consequence with overall likelihood will provide the significance of the risk, which is a number that will then fall into a range of **INSIGNIFICANT RISK**, **UNCERTAIN RISK** or **SIGNIFICANT RISK**, as shown in the table below.

Determination of Overall Environmental Significance

| Significance or Risk | Insignificant risk (cc) | Uncertain risk (bb) | Potential significant risk (aa) |
|--|------------------------------------|--------------------------------|--|
| Overall Consequence X Overall Likelihood | 1 - 4.9 | 5 - 9.9 | 10 – 19.9 |

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.

Description of Environmental Significance and related action required

| Significance | An insignificant risk (cc) | An uncertain risk (bb) | A potential significant risk (aa) |
|---------------------|--|--|--|
| 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 substantial in relation to other impacts. Pose a risk to the company. Unacceptable |
| Action Required | Maintain current management measures. Where possible improve. | Maintain current management measures. Implement monitoring and evaluate to | Improve management measures to reduce risk. |

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| Significance | An insignificant risk (cc) | An uncertain risk (bb) | A potential significant risk (aa) |
|--------------|-------------------------------|---|--------------------------------------|
| | | determine potential increase in risk. Where possible improve | |

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

- A potential Risk (aa) Risks of a substantial order. Mitigation and / or remedial activity would be feasible but difficult, expensive, time-consuming or some combination of these.
- An uncertain risk (bb) Risk would be negligible. Almost no mitigation and or remedial activity would be needed, and any minor steps, which might be needed, would be easy, cheap and simple.
- An insignificant risk (cc) There would be very small to no risk.

1.2 Environmental risk assessment of each main activity in the decommissioning/rehabilitation phase after implementation of the mitigation measures as contained in the EMP.

Not applicable as mining operations never commenced therefore no rehabilitation mitigation measures were implemented.

2 REGULATION 60 (b, c): The undertaking of a second level risk assessment on issues classified as potential significant risks.

No issues / impacts classified as potential significant risks were identified at the site.

3 REGULATION 60 (d) Re-evaluation and re-classification of uncertain risks

No aspects classified as uncertain risks were identified on site or deemed applicable to this application.

4 REGULATION 60 (e) Documenting the Status of Insignificant Risks

As above.

5 REGULATION 60 (f) Identifying alternative risk prevention or management strategies for potential significant risks

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No issues / impacts classified as potential significant risks were identified at the study area.

6 REGULATION 60 (g) – Agreeing on management measures to be implemented for the potential significant risks

No issues / impacts classified as potential significant risks were identified at the mining permit area.

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CLOSURE REPORT MPRDA Regulation 62 & NEMA GN 940

| | | | |
|---------------------------------------|--|------------------------------|---------------|
| Permit Number: | WC 30/5/1/3/2/10258 MP | Report Date: | November 2025 |
| Site Name: | Mossel Bay | Report Number: | 01 |
| Contractor: | Haw and Inglis Civil Engineering (Pty) Ltd | Other Authorisations: | None |
| Environmental Control Officer: | Zoë Norval | | |

| | | |
|--------------------------|--|----------------------------------|
| Site Location: | Access to the mining permit area is ± 22.47km west of Mossel Bay. Using the N2, head west for approximately 22.47km. The entrance to the proposed mining area is found on the left of the road | |
| Site Coordinates: | A 34.180768°S; 21.894673°E | A 34°10'50.765"S; 21°53'40.823"E |
| | B 34.182262°S; 21.894542°E | B 34°10'56.143"S; 21°53'40.351"E |
| | C 34.182071°S; 21.891307°E | C 34°10'55.456"S; 21°53'28.705"E |
| | D 34.180587°S; 21.891401°E | D 34°10'50.113"S; 21°53'29.044"E |
| | A 34.180768°S; 21.894673° | A 34°10'50.765"S; 21°53'40.823"E |

1 REGULATION 62 (a - k): Closure and environmental objectives

1.1 Description of the closure objectives and their extent of alignment to the mining environment

The approved EMPR of the permit holder notes that the end objective is to rehabilitate the entire mining site in such a way to ensure that the new man-made topographical landscape would blend in with the surrounding landscape, not pose a safety hazard to humans and animals, while at the same time allow for alternative land uses.

If mining activities commenced, the decommissioning activities would have been the following:

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- ❖ Removal of all mining machinery
- ❖ Removal/levelling of all stockpiled material;
- ❖ Landscaping the stockpile area, and replacing the topsoil (if previously removed);
- ❖ Vegetating the reinstated area; and
- ❖ Controlling the invasive plant species.

As previously stated, the permit holder did not commence mining activities; therefore, no rehabilitation was undertaken.

1.2 Closure plan

The requested Closure plan is attached as Appendix 1.

1.3 Summary of regulatory requirements and conditions for closure and description of the methods to decommission each mining component

According to the mine closure process (Regulations 56 to 62) the following regulatory requirements and conditions needs to be addressed by the mining permit holder if mining activities commenced:

Layout Plan:

- A final layout plan must be submitted with the closure application.
 - *Please see the final layout plan attached as Appendix 1 to this document.*

Rehabilitation of the Mining area:

- Stockpiles will be removed during the decommissioning phase, the area ripped and the topsoil returned to its original depth to provide a growth medium. On completion of operations, all structures or objects shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002):
- Where sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped.
- The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.
- Photographs of the office sites and workshop, before and during the mining operation and after rehabilitation, shall be taken at selected fixed points and kept on record for the information of the Regional Manager.

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- On completion of mining operations, the surface of these areas, if compacted due to hauling and dumping operations, shall be scarified and graded to an even surface condition. Where applicable / possible topsoil needs to be returned to its original depth over the area.
- Prior to replacing the topsoil, the material that was removed from these areas will be replaced in the same order as it originally occurred. The area shall then be fertilized if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local, adapted indigenous seed mix.

Rehabilitation of the excavated area:

- The risk of unsloped and unrehabilitated areas posing a safety risk can be reduced to being Low through the implementation of the mitigation measures listed below:
- The excavated area must serve as a final depositing area for the placement of overburden.
- Rocks and coarse material removed from the excavation must be dumped into the excavation.
- No waste may be permitted to be deposited in the excavations.
- Once overburden, rocks and coarse natural materials have been added to the excavation and it was profiled with acceptable contours and erosion control measures, the topsoil previously stored must be returned to its original depth over the area.
- The area must be fertilized if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local or adapted indigenous seed mix in order to propagate the locally or regionally occurring flora, should natural vegetation not re-establish within 6 months from closure of the site. Seeds should be harvested prior to commencement of the mining activities and indigenous vegetation or a suitable crop should be reintroduced during the rehabilitation process;
- Where re-vegetation work will be done on the disturbed areas, only suitable crops, or locally indigenous, endemic vegetation must be used, and no “alien Plant” species are allowed.
- If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and

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any deleterious effects on the soil arising from the mining operation be corrected and the area be seeded with a vegetation seed mix to his or her specification.

Final rehabilitation:

- Rehabilitation of the surface area shall entail landscaping, levelling, top dressing, land preparation, seeding (if required) and maintenance, and invasive plant species clearing.
- All mining equipment, and other items used during the mining period must be removed from the site (section 44 of the MPRDA).
- Waste material of any description, including receptacles, scrap, rubble and tyres, must be removed entirely from the mining area and disposed of at a recognized landfill facility. It will not be permitted to be buried or burned on the site. Waste separation will be conducted on site and send for recycling as far as practical. Adequate waste receptacle and recycle bins will be placed on the site for all waste generated from daily operations (e.g. waste containers, food packaging, etc. Waste oils and greases (Hazardous waste) generated by the machinery and equipment on site will be collected by a registered contractor for the disposal at a licensed hazardous waste disposal facility.
- The management of invasive plant species must be done in a sporadic manner during the life of the mining 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.

1.4 Summary of the results of the environmental risk report

Not applicable.

1.5 Results of progressive rehabilitation

Not applicable.

1.6 Long-term management and maintenance expected

Not applicable.

1.7 Financial provision for monitoring, maintenance, and post closure management

According to Appendix 3 of the EMPr, financial provision (Regulation 54) is the amount that is necessary for the rehabilitation of damage caused by the operation, both at sudden

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closure during the normal operation of the project and at final, planned closure. This reflects the amount it will cost the DMPR to rehabilitate the area disturbed in case of liquidation or abscondence.

A financial guarantee to the value of R 1 324 456,13 is lodged with DMPR that is sufficient to cover the financial provision for rehabilitation.

1.8 Sketch plan describing the final and future land use proposal

The final and future land use proposal for the site covered by Mining Permit WC 30/5/1/3/2/10258 MP reflects that no legal mining activities ever commenced by the permit holder, Haw and Inglis Civil Engineering (Pty) Ltd, therefore no rehabilitation is needed. As the site is located out of public view and access is restricted to the landowner, it is deemed to be adequately secured.

1.9 Record of interested and affected persons consultation

According to Appendix 3 of this report, the landowner has no objection to the issuing of the closure certificate for this mining permit.

APPENDIX 1

REGULATION 2.2



APPENDIX 2

MINE CLOSURE PLAN



APPENDIX 3

LANDOWNER CONSENT



APPENDIX 4

EXPERTISE OF EAP



APPENDIX 5

CONDITIONS PRIOR TO THE ISSUANCE OF THE MINING PERMIT



APPENDIX 6

AFFIDAVIT

