

**GRAHAMSTOWN BRICK (PTY) LTD T/A MAKANA BRICK**  
**PORTION 3 OF THE FARM ORCHARDS 233**  
**GRAHAMSTOWN, EASTERN CAPE PROVINCE**

**ENVIRONMENTAL PERFORMANCE ASSESSMENT**



<b>DMRE REFERENCE NUMBER:</b>	<b>EC 30/5/1/3/2/10397 MP</b>
<b>AUDIT PERIOD:</b>	<b>AUGUST 2019 – JULY 2021</b>

**PREPARED FOR:**

Grahamstown Brick (Pty) Ltd  
t/a Makana Brick  
Contact Person: Mr C Meyer  
Tel: 046 603 6300  
Fax: 086 729 4076  
Postal Address:  
P.O. Box 7068  
Grahamstown North  
6141

**PREPARED BY:**

Greenmined Environmental (Pty) Ltd  
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**ENVIRONMENTAL PERFORMANCE ASSESSMENT  
GRAHAMSTOWN BRICK (PTY) LTD T/A MAKANA BRICK**



**1. PROJECT SPECIFIC DETAIL**

ITEM	MINING PERMIT HOLDER
Company Name	Grahamstown Brick (Pty) Ltd t/a Makana Brick
Contact Person	Mr Colin Meyer
Tel Number	046 603 6300
Cell Number	082 578 9480
E-mail Address	<a href="mailto:cmeyer@makana-brick.co.za">cmeyer@makana-brick.co.za</a>
Postal Address	P.O. Box 7068 Grahamstown North 6141
ITEM	CONSULTANT DETAIL
Company Name	Greenmined Environmental (Pty) Ltd
Contact Person	Ms Christine Fouché
Tel Number	021 851 2673
Cell Number	082 811 8514
E-mail Address	<a href="mailto:christine.f@greenmined.co.za">christine.f@greenmined.co.za</a>
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129
ITEM	LOCATION AND AREA INFORMATION
Site Name	Makana Brick – Collingham Quarry
Property Description	Portion 3 of the farm Orchards 233
Location	The mining area is located ±4 km northeast from the King Flats residents in Grahamstown, between the N2 national road (south) and the Botha's River (north) on Portion 3 of the farm Orchards 233.
Size of Mining Area	4.95 ha



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## **2. ENVIRONMENTAL AUDIT REPORT**

### **PROJECT DETAIL**

<b>Permit Number:</b>	16/2018 (EC 30/5/1/3/2/10397 MP)	<b>Date of commencement:</b>	August 2018
<b>Site name:</b>	Makana Brick – Collingham Quarry	<b>Inspection date:</b>	15 July 2021
<b>Permit Holder:</b>	Grahamstown Brick (Pty) Ltd t/a Makana Brick	<b>Other authorisations:</b>	N/A
<b>Report number:</b>	02		

### **DETAIL OF AUDITOR**

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

<b>ECO:</b>	Christine Fouche
<b>Expertise:</b>	Ms Fouche has a Diploma in Nature Conservation and a BSc in Botany and Zoology with fourteen years' experience in doing environmental impact assessments and compliance monitoring in South Africa.
<b>Declaration of independence:</b>	<p>I, Christine Fouche, in my capacity as environmental control officer declare that–</p> <ul style="list-style-type: none"> <li>• I act as independent environmental control officer in this compliance audit;</li> <li>• 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;</li> <li>• I have expertise in conducting environmental compliance audits, including knowledge of the Act and regulations that have relevance to the activity;</li> <li>• I will adhere to and comply with all responsibilities as indicated in the National Environmental Management Act and Environmental Impact Assessment Regulations.</li> <li>• 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 (as amended).</li> </ul> <p>Also see attached declaration of independence.</p> <p></p> <p>Christine Fouché</p> <p style="text-align: right;">Date: 16 July 2021</p>



**SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT**

**(APPENDIX 7 SUB-REGULATION 3(C)):**

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

**OBJECTIVE:**

The objective of the environmental audit report (EAR) is to evaluate compliance of the operational activities with the Environmental Management Programme Report (EMPR) and Environmental Authorisation (EA) as approved by the Department of Mineral Resources and Energy.

**INSPECTED AREAS:**

The active mining areas were inspected during the audit. Ms Fouche was accompanied by site management.

**ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE**

**(APPENDIX 7 SUB-REGULATION 3(F)):**

The assumptions made in this document, stem from background information gathered during the meeting with the Permit Holder and the inspection of the mining footprint. At this stage no uncertainties were identified that need to be disclosed here.

**LOCATION**

<p><b>Site location:</b></p>	<p>The mining area is located ±4 km northeast from the King Flats residents in Grahamstown, between the N2 national road (south) and the Botha's River (north) on Portion 3 of the farm Orchards 233.</p>																																														
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**PROJECT DESCRIPTION**

Grahamstown Brick (Pty) Ltd t/a Makana Brick is a brick-making industry that holds a mining permit over 4.95 ha of Portion 3 of the farm Orchards 233 in the Grahamstown area. The mining footprint was identified between two older quarries, over an area that has previously been disturbed.

The Permit Holder extracts the material from the western end of the approved footprint through open-cast excavation, extending the mine in an eastern direction. The material is then loaded onto trucks that deliver it to the Makana brick making facility (off-site). No processing plant, permanent infrastructure or buildings were constructed/established on site. The Permit Holder is busy with the mining of Phase 1 (as prescribed in the approved EMPR).

**SITE CONDITIONS**

Sunny, dry day with occasional windy gusts.

**REPORTABLE ENVIRONMENTAL INCIDENTS**

<b>Incident date:</b>	Makana Brick keeps an incident register. No environmental incidents occurred during the audit period.
<b>Incident no:</b>	
<b>Incident:</b>	
<b>How addressed:</b>	
<b>When addressed:</b>	

**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	<b>LOW</b> – Mitigation not needed / mitigation measures to be maintained
2	<b>MEDIUM</b> – Mitigation should be considered
3	<b>HIGH</b> – Mitigation compulsory



**ENVIRONMENTAL PERFORMANCE ASSESSMENT  
GRAHAMSTOWN BRICK (PTY) LTD T/A MAKANA BRICK**



**INSPECTION ASPECTS**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
<b>LEGISLATION COMPLIANCE:</b>				
National Environmental Management Act, 1998 (Act No 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended 2017)	5	-	Compliant	DMRE issued an environmental authorisation (EA) for the activities on 5 June 2018.
Copy of the EA and EMPR available on site	5	-	Compliant	Site documents are kept at the main offices of Makana Brick (Beaconsfield Farm).
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Compliant	The first renewal application, submitted 08 July 2020, is still pending at the DMRE.
Mining permit available on site	5	-	Compliant	Site documents are kept at the main offices of Makana Brick (Beaconsfield Farm).
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	N/A	-	-	The operations does not trigger the NEM:AQA.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	5	-	Compliant	Although the mining activities do not trigger listed activities in terms of the NEM:WA, the operation is managed in accordance with the said act.
National Water Act, 1998 (Act 36 of 1998)	N/A	-	-	The operations does not trigger the NWA.
Copy of Water Use Authorisation available on site.	N/A	-	-	-
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	5	-	Compliant	Site management controls the invader plant species on site in accordance with the requirements of the NEM:BA, 2004.
Hazardous Substances Act, 1973 (Act 15 of 1973)	N/A	-	-	No chemicals are stored within the mining footprint.
<b>ASPECTS OF THE AFFECTED ENVIRONMENT</b>				
<b>PROCEDURES, PLANS &amp; EA CONDITIONS:</b>				
Alien eradication programme established and implemented (EA Condition 10).	5	-	Compliant	-
Name and contact details of the ECO (on-site) sent to DMRE within 30 days of commencement.	5	-	Compliant	The name and contact details of the ECO was sent to DMRE on 19 August 2019.
Emergency preparedness plan available on site.	5	-	Compliant	An emergency preparedness plan must be developed for the site.





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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Incident register up to date.	5	-	Compliant	The Permit Holder keeps an incident register at his offices. To date no environmental incidents occurred that could be recorded.
Complaints register available on site.	5	-	Compliant	The Permit Holder keeps a complaints register at his offices. To date no complaints were received.
Notices, compliant with EA condition 6.2 placed at site entrance.	5	-	Compliant	-
<b>TOPOGRAPHY (APPENDIX 6 PG 101, 102):</b>				
Mining conducted in accordance with the approved mine development plan (four phases)	5	-	Compliant	Mining of Phase 1 and a portion of Phase 2 is in accordance with the mine design plan as prescribed in Appendix 6 of the BAR.
Mining contained to designated mining area	5	-	Compliant	-
Faces >10 m high benched	N/A	-	-	Not applicable.
Boundary sides <5 m profiled to 1:2 gradient & >5 to 1:2.5/3 m gradient	N/A	-	-	Not yet applicable.
Quarry floor sloped at 2% to allow water to drain into the retention pond.	5	-	Compliant	-
Boundary pillars removed as per mine development plan.	5	-	Compliant	The western pillar was removed.
Benches profiled within 14 days after mining ceased and vegetated within 9 months.	N/A	-	-	Not yet applicable.
<b>GEOLOGY / SOIL MANAGEMENT (EMPR PG 54, 55 APPENDIX 6 PG 102 – 104, EA CONDITIONS):</b>				
Topsoil stripping done	5	-	Compliant	
Topsoil storage (1 m high)	4	1	No mitigation needed	Some of the topsoil heaps are higher than 1 m. However, the stockpiled topsoil has a well-established vegetation layer and disturbance/correction of the topsoil height is therefore not recommended. Any future topsoil storage must be kept to a height of 1 m.
Stockpiled topsoil heaps vegetated	5	-	Compliant	-
Shade cloth screens used to cover stockpiled topsoil	N/A	-	-	Not applicable as the topsoil heaps has re-vegetated.
Overburden stripped	5	-	Compliant	-
Overburden storage	5	-	Compliant	-
Product stockpiles lower than 2 m	5	-	Compliant	At the time of the inspection, very little material was stockpiled, and the heaps were below 2 m.



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Erosion reinstated, area compacted and an erosion-monitoring programme implemented.	5	-	Compliant	Implemented when needed.
Each horizontal platform re-vegetated to curb erosion.	N/A	-	-	Not yet applicable.
Horizontal platforms sloped to no more than 1% gradient forwards to enable drainage of storm water.	N/A	-	-	Not yet applicable
Clay sub-layer prepared prior to the return of overburden and topsoil. (Appendix 6 Pg. 103).	N/A	-	-	Not yet applicable.
Topsoil returned to rehabilitated area	N/A	-	-	Not yet applicable.
<b>VEGETATION (EMPR PG 53, 57, APPENDIX 6 PG 103, 106, 107, EA CONDITIONS):</b>				
Vegetation removal restricted to mine boundary.	5	-	Compliant	-
Unnecessary surface disturbance avoided.	5	-	Compliant	-
Weeds and invader plants controlled on site.	5	-	Compliant	-
Indigenous groundcovers used to re-vegetate reinstated areas.	N/A	-	-	Not yet applicable.
Indigenous plant species and trees transplanted to the area between phase 1 & 2 (no mining) or potted	5	-	Compliant	-
<b>FAUNA (APPENDIX 6 PG 108, 109):</b>				
All animals, birds and reptiles protected on site	5	-	Compliant	-
Nesting sites temporarily excluded from the mining area / relocated.	N/A	-	-	Not yet applicable.
Fauna identification walk-through prior to bush clearance/topsoil stripping to identify reptiles, amphibians and other slow moving individuals.	5	-	Compliant	-
Operational pits providing an escape route for trapped animals.	5	-	Compliant	-
Operational areas daily inspected for signs of trapped animals.	5	-	Compliant	-
An appropriately qualified contractor used to remove species that cause harm to employees.	N/A	-	-	Not yet applicable
No poisoning of scavengers / varmints allowed.	5	-	Compliant	



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Electrical wires isolated to prevent animals from being shocked.	N/A	-	-	At the time of the inspection, there were no machinery or equipment with electrical wires that may cause harm to animals.
<b>AIR QUALITY (APPENDIX 6 PG 110, 111, EA CONDITIONS):</b>				
Denuded areas limited to operational areas.	5	-	Compliant	-
Haul roads and denuded areas dampened to reduce dust.	N/A	-	-	Site management mentioned that very little to no dust is generated at the site and to date no dust suppression was needed. At the time of the inspection, no mining took place and the site was dust free.
No brick making facilities or kilns established on site.	5	-	Compliant	-
Mining stopped during periods of high winds.	5	-	Compliant	When applicable.
Vehicles transporting kaolin, spoil, topsoil or other dust material on public roads covered.	4	3	Mitigation to be implemented	Site management indicated that covering the trucks is impractical, but proposed the spraying of the clay with water to prevent windblown dust during transport.
<b>NOISE CONTROL (APPENDIX 6 PG 111):</b>				
Machinery and equipment in good working order (silencers, slipping fan-belts, bearings).	TBC	-	-	No machinery/equipment were present at the mine during the inspection.
Equipment turned off when not in use.	TBC	-	-	
Operation following normal working hours (Weekdays 7:00 – 18:00 summer, 7:30 – 17:00 winter, Saturdays 8:00 – 13:00). No work on Sundays and holidays.	5	-	Compliant	Although no mining took place during the audit, site management confirmed that the work hours of the mine correspond with those of the EMPR.
No amplified music allowed.	5	-	Compliant	-
Hearing protection available to employees.	5	-	Compliant	-
<b>HERITAGE MANAGEMENT (APPENDIX 6 PG 114):</b>				
Archaeological, cultural and/or heritage remnants protected.	N/A	-	-	No archaeological, cultural or heritage remnants were discovered or reported on during the audit period.
<b>WATER MANAGEMENT (EMPR PG 42, 55 APPENDIX 6 PG 105, 109, EA CONDITIONS):</b>				
100 m buffer zone between the mining area and the Botha's River maintained.	5	-	Compliant	-



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GRAHAMSTOWN BRICK (PTY) LTD T/A MAKANA BRICK**



DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Mining from Botha's River prohibited.	5	-	Compliant	-
Retention pond created within the excavations (<2 m deep).	N/A	-	-	Due to the presence of the nearby retention pond, to the north of the mining area, there is no need for another pond in the mining footprint.
Water from the retention pond used for irrigation and dust suppression on site.	N/A	-	-	No yet applicable.
<b>VISUAL EXPOSURE (APPENDIX 6 PG 112):</b>				
Is the contractor implementing good visual and housekeeping standards?	5	-	Compliant	-
Cuts follow curvilinear lines rather than straight geometric lines.	5	-	Compliant	-
<b>MANAGEMENT OF FUEL AND HAZARDOUS PRODUCTS (APPENDIX 6 PG 112):</b>				
No chemicals stored on site.	5	-	Compliant	-
Complete oil/fuel spill kits available on site.	N/A	-	-	Due to the nature of the site, it is recommended that the spill kit / absorbent material is kept at the main office of Makana Brick until needed.
Management of fuel and oil spills	N/A	-	-	According to site management no spills occurred during the audit period that had to be cleaned, and no spills were noted during the inspection.
<b>FIRE MANAGEMENT (APPENDIX 6 PG 106):</b>				
No open fires permitted on site	5	-	Compliant	-
Adequate & appropriate fire-fighting equipment	5	-	Compliant	-
Employees trained in firefighting	5	-	Compliant	-
<b>WASTE MANAGEMENT (EMPR PG 56, 57, APPENDIX 6 PG 105, 110 - 112):</b>				
No site toilet, septic tank near a watercourse	5	-	Compliant	-
Proper sanitation facilities available to employees	1	3	To be addressed	As discussed during the inspection, site management must ensure that there is at least a chemical toilet on site when mining takes place. The toilet must be in walking distance from the employees, and must be serviced by a registered sewerage handling contractor that supplies the site with a safe disposal certificate after each service.



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Waste collected in sealable containers	N/A	-	-	General solid waste (if any) is kept in the site vehicles until it is incorporated into the waste system at the main offices of Makana Brick (Beaconsfield Farm).
Site free of day-to-day litter.	5	-	Compliant	-
Spillages not disposed of into the environment, ditches, drains or water courses.	N/A	-	-	According to site management no spillages occurred during the audit period.
Burning of waste prohibited.	5	-	Compliant	-
Normal repair work done at the off-site workshop.	5	-	Compliant	-
Drip trays used when emergency repairs is needed.	5	-	Compliant	-
Waste separation implemented (general / hazardous).	N/A	-	-	Not applicable as the site generates very little to no general waste and no hazardous waste. Any waste that may be generated at the site is removed to Makana Brick where it is incorporated into the existing waste streams.
General waste dumped at a recognised landfill site.	5	-	Compliant	Any waste removed from the site is incorporated into the existing waste disposal system at the Makana Brick Plant (Beaconsfield Farm) that is removed by Skipgo to the Makhanda municipal dump.
Hazardous waste removed by a registered waste handling contractor.	N/A	-	-	Not applicable as the site has not generated hazardous waste.
Hazardous waste daily removed from site.	N/A	-	-	
No washing of vehicles allowed on site.	5	-	Compliant	-
No scrap metal / dysfunctional machinery stored on site.	5	-	Compliant	-
No waste stockpile area allowed outside the boundaries of the mining area.	5	-	Compliant	-
<b>MINE AND EQUIPMENT MANAGEMENT (BAR PG 40, APPENDIX 6 PG 102, 111 EA CONDITIONS):</b>				
Mining area demarcated with visible beacons.	1	3	To be addressed	The mining area must be demarcated by visible beacons to ensure all employees are aware of the limits of the site.
No camp site established on site.	5	-	Compliant	-
<b>VEHICLE AND TRAFFIC MANAGEMENT (BAR PG 43, EMPR PG 54, 55, APPENDIX 6 PG 105, 111 - 113, EA CONDITIONS):</b>				
Overloading prevented.	5	-	Compliant	-



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Movement of project related vehicles & machinery restricted to existing roads. No crisscrossing through undisturbed areas.	5	-	Compliant	-
Vehicle speed restricted to 30 km/h.	5	-	Compliant	Signage reducing the speed of site vehicles to 30 km/h was add to the entrance road.
Refuelling done off-site.	3	1	Mitigation not needed	The bulldozer working on site is filled from a small diesel bowser when applicable. Site management confirmed that drip trays are used each time refuelling is done.
Vehicles entering the N2/other public road come to complete standstill (stop) before entering the road.	TBC	-	-	As the site was not operational during the inspection, compliance to this condition needs to be confirmed.
Contractors signed a letter of agreement to the above effect (complete stop).	5	-	Compliant	-
Access and haul roads maintained and protected against erosion.	5	-	Compliant	-
Signage erected both sides of the quarry entrance and access to the N2.	5	-	Compliant	-
Traffic restricted from driving in rehabilitated areas.	N/A	-	-	Not yet applicable as no areas were rehabilitated yet.
<b>SOCIAL IMPACT MANAGEMENT (APPENDIX 6 PG 113):</b>				
Access to other sections of the landowner's property prohibited.	5	-	Compliant	-
Theft, fishing or poaching in adjacent areas prohibited and perpetrators prosecuted.	5	-	Compliant	-
No wood / plants collected from neighbouring areas.	5	-	Compliant	-
Gates to the landowner's property kept closed (where required).	5	-	Compliant	-
<b>EMPLOYEE AND SAFETY MANAGEMENT (EA CONDITIONS):</b>				
Workers provided with PPE.	5	-	Compliant	-
Employees attended environmental induction training.	5	-	Compliant	-
Proof of training available for auditing purposes.	5	-	Compliant	-



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

No written environmental related complaints were received during the audit period.

**AUDITING OF EA, EMPR AND REPORTING THEREOF  
(REGULATION 34):**

<b>Date of previous EAR/EPA:</b>	02 August 2019
<b>Proof of submission to DMRE available:</b>	Proof of submission of the 2019 EPA is available at Greenmined Environmental (Pty) Ltd.
<b>EAR/EPA compiled by independent person with environmental auditing expertise:</b>	The report was compiled by Greenmined Environmental (Pty) Ltd.
<b>Potential and registered I&amp;AP's notified within 7 days of the submission date, and report available on publicly accessible website</b>	This report will be loaded onto the Greenmined Environmental website, and the landowner will be informed of the availability of the report.

**GENERAL REPORT**

Compliance of the mining site with the EMPR and EA conditions were reviewed during this assessment. The mining operation recorded a compliance score of 97% for the audit period.

As mentioned earlier, Phase 1 and a portion of Phase 2 have been opened to date; with the remaining permit footprint left undisturbed. At the time of the inspection, no mining took place and there were no machinery/equipment on site.

**Environmental Control Officer (ECO):**

As discussed on site, the EA requires the designated ECO of the mine to:

1. Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material).
2. Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what preventative measures were implemented to avoid re-occurrence of complaints.
3. Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials.
4. Keep copies of all environmental reports submitted to the department.
5. Keep the records of all permits, licences and authorisations required by the operation.
6. Compile a monthly monitoring report and make it available to the department if requested.





At the time of the inspection, conditions 1-5 were being implemented. Condition 6: It is important that site management implement the use of a monthly compliance monitoring report that can be made available for auditing when requested.

**Emergency Preparedness Plan:**

The Emergency Preparedness Plan, reported on in the previous audit report, was compiled and is available at the Makana Brick site offices.

**Site Notification and Signage:**

The Permit Holder obtained the site notices and speed signs and these were placed at the entrance to the site and along the entrance road.

**Demarcation of the Mining Area:**

As mentioned earlier, visible beacons must be placed along the boundaries of the mining area as required by the EMPR and EA.

**Ablutions:**

Site management must ensure that the employees working at the mine has access to at least a chemical toilet that is regularly (weekly when mine is operational) serviced by an accredited sewerage handling contractor. The contractor must provide the mine with a safe disposal certificate, each time the toilet is serviced.

**DOCUMENT CHECKLIST:**

• Mining permit	-	Present
• Approved EMPR	-	Present
• Regulation 2(2) plan	-	Present
• Financial provision	-	Present
• Environmental Audit Report	-	Present
• Plan highlighting rehabilitation	-	Part of the EMPR
• Alien eradication programme	-	Present
• Non-conformance recording	-	Not yet applicable
• Complaints Register	-	Present
• Incident Register	-	Present
• Environmental Awareness Training	-	Present
• Emergency Preparedness Plan	-	Present

**MATTERS TO BE ADDRESSED:**

1. Place the beacons along the mining footprint;
2. Ensure that the employees have access to a chemical toilet that is within walking distance when the site is operational;
3. Ensure a dust alleviating measure is implemented to prevent clay blowing from transport trucks.





**ENVIRONMENTAL PERFORMANCE ASSESSMENT  
GRAHAMSTOWN BRICK (PTY) LTD T/A MAKANA BRICK**



**ABILITY OF EMPR TO ADEQUATELY MANAGE OR MITIGATE ENVIRONMENTAL IMPACTS**

**(APPENDIX 7 SUB-REGULATION 3(E)):**

It is believed that the EMPR currently adequately manage and/or mitigate environmental impacts at the mining area.

**NEED FOR AMENDMENT OF THE EMPR:**

No need was identified for the amendment of the EMPR.

**FINANCIAL PROVISION:**

The permit holder has a financial guarantee to the value of R 255 000 lodged with the DMRE.

The NEMA Financial Provision Regulations, 2015 stipulates that a holder of permit must annually review/assess/adjust the financial provision of the site. The 2021 financial provision required to rehabilitate the mining area in accordance with the Guideline Document for the Evaluation of the Quantum of Closure-related Financial Provision by a Mine and as prescribed in terms of Regulation 54 (1) is R 59 508.40. The 2021 financial provision is less than the value of financial guarantee in place at the DMRE, and the permit holder therefore does not have to provide a shortfall.

**ECO SIGNATURE**

<b>NAME:</b>	<b>SIGNATURE:</b>	<b>DATE:</b>
Christine Fouche		16 July 2021

**PHOTOGRAPHS**



View of the Phase 1 mining area where the existing quarry (outside the mining footprint) can be seen at the back. Photo taken in north-western direction.



View of the Phase 1 mining area from the existing quarry (outside the mining footprint). The clay heaps in the front of the photo is not part of the MP Holder's operations. Photo taken in a south-eastern direction.



View of the nearby retention pond.



View of the Phase 2 mining area.



Product stockpiles at the mining area.



## DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

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I, ..... Christine Fouche .....(Full Name and Surname) declare that –

### General declaration:

- I act as the independent environmental practitioner in this application.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations, and all other applicable legislation.
- I will take into account, to the extent possible, the matters listed in Regulation 8 of the Regulations when preparing the application and any reporting relating to the application.
- I have no, and will not engage in, conflicting interest in the undertaking of the activity.
- I understand to disclose to the applicant and competent authority all material information in my possession that reasonably has or may have the potential of influencing- any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority.
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and the participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with reasonable opportunity to participate and to provide comments on documents that are produced to support the application.
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report.
- I will register of all interested and affected parties that participated in public participation process.
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not.
- All the particulars furnished by me this form are true and correct.
- I will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations.
- I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act.

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

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

~~I have vested interest in the proposed activity proceeding, such vested interest being:~~

.....  
.....  
.....  
.....

Signature of the Environmental Assessment Practitioner: *Christine Fouche*

Name of Company: Greenmined Environmental (Pty) Ltd

Date: 19 July 2021

**UNDERTAKING UNDER OATH/AFFIRMATION**

I, Christine Fouche..... swear under oath/affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Environmental Assessment Practitioner *Christine Fouche*

Name of Company: Greenmined Environmental (Pty) Ltd

Date: 19 July 2021

Signature of the Commissioner of Oaths:

Date: 19/07/2021



**COMMISSIONER OF OATHS (RSA)**

**Elsaine Costerus**

**Admitted Attorney of the High Court of South Africa**

**Non-Practicing Attorney**

**Main Office Block 1, Baker Square No 36**

**Paardevelei, De Beers Avenue, Somerset West**

Official Stamp below