MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

FINAL PERFORMANCE ASSESSMENT REPORT (REGULATION 55)

& ENVIRONMENTAL RISK REPORT (REGULATION 60)

& CLOSURE PLAN (REGULATION 62)

DEPARTMENTAL REFERENCE NUMBER:	***WC 30/5/1/3/2/10219 MP***
REPORT DATE:	**25 April 2025**

Prepared For:

Smit Grondwerke (Pty) Ltd
Contact person: Mr TG Smit
Tel: 027 482 1701
Email: grondwerke@smiting.co.za
P.O. Box 249
Clanwilliam
8135

Prepared By:

Greenmined Environmental
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ABBREVIATIONS

SM	Sand Mine
DMRE	Department of Mineral Resources and Energy
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EMP	Environmental Management Programme
I&AP's	Interested and Affected Parties
MPRDA	Minerals and Petroleum Resources Development Act, 2002

Executive summary

Smit Grondwerke (Pty) Ltd appointed Greenmined Environmental (Pty) Ltd (GM) to attend to the closure application for the Remainder of Portion 2 of farm 199, Clanwilliam, Western Cape Province.
The mining area was approximately 4.9ha in extent. The mine is located±740 ±275 m south-west of the N7 national road, approximately 6.5 km north of Clanwilliam town.

The Closure will be conducted in terms of the Mineral and Petroleum Resources Development Act, 2002 (as amended) and the National Environmental Management Act, 1998 (as amended),

Way forward

The site has been decommissioned and rehabilitated. The results hereof are included in this document for consideration, upon which the Minister's delegated authority, the Regional Manager, is required to decide as to whether the closure certificate is to be granted.

TABLE OF CONTENTS

1. PROJECT SPECIFIC DETAIL

ITEM	AUTHORISATION/ CLIENT HOLDER
Company Name	Smit Grondwerke (Pty) Ltd
Contact Person	Mr TG Smit
Tel Number	027 482 1701
Postal Address	PO Box 249 Clanwilliam 8135
ITEM	**CONSULTANT DETAIL**
Company Name	Greenmined Environmental
Contact Person	Murchellin Saal
Tel Number	021 851 2673
Cell Number	076 792 6327
E-mail Address	Murchellin.s@greenmined.co.za
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129
ITEM	**LOCATION AND AREA INFORMATION :**
Site Name	Remainder of Portion 2 of the Farm 199, Clanwilliam, Western Cape Province.
Surveyor General Code	C02000000000199000002
Location	The mine is located ±740m south-west of the N7 national road, approximately 6.5 km north of Clanwilliam town
Land owner	Mr. GE Smith and Mrs HS Smith

Contact person	Mr TG Smit
Address:	P.O. Box 249 Clanwilliam 8135
Telephone:	027 482 1701
Title deed information:	T97581/1996
Size of the property:	4.9 ha

2. FINAL PERFORMANCE ASSESSMENT REPORT

{Regulation 55(9)}

PROJECT DETAIL

Site Names	Remainder of Portion 2 of farm 199, Clanwilliam, Western Cape Province.	**Date of Commencement:**	2016 (10111 MP)
Reference Numbers:	*WC 30/5/1/3/2/10219 MP* 06/2020MP	**Inspection Date:**	N/A Supporting photographs were provided and discussed with landowner and client.
Authorisation Holder:	Mr. TG Smit	**Report Number:**	Closure Report
Environmental Control Officer:	Murchellin Saal	**Other Authorisations:**	N/A

DETAIL OF AUDITOR

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

ECO:	Murchellin Saal
EXPERTISE:	Mrs. MD Saal has 14 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.
DECLARATION OF INDEPENDENCE:	I Murchellin Saal declare that – • 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 (as amended 2017).  Signature of ECO Date: 25 April 2025

SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT

(APPENDIX 7 SUB-REGULATION 3(C))

This final performance assessment report/environmental audit report was compiled in terms of the requirements of the NEMA EIA Regulations, 2014 (as amended 2017).

OBJECTIVE:

The objective of this report is to evaluate compliance of the mining activities with the Environmental Management Plan (EMP) as approved by the Department of Mineral Resources.

INSPECTED AREAS:

The inspection included an assessment of the following areas:

- Access road; and
- Excavation area.

In order to establish the environmental compliance assessment of the operation, the mining site was inspected by the client and landowner and photos thereof was provided to Greenmined Environmental , Mrs. M Saal.

ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE

(APPENDIX 7 SUB-REGULATION 3(F))

The assumptions made in this document, stem from specific information gathered during the site audit and background information gathered from site management and landowner. No uncertainties or gaps in knowledge could be identified that is applicable during this audit period.

LOCATION

Location:	Remainder of Portion 2 of farm 199, Clanwilliam, Western Cape province
Map:	

	DECIMAL DEGREES	DEGREES MINUTES SECONDS
Site coordinates (System LO 23):	A --32.135141ºS; 18.843874ºE	A 32º08'06.508"S;18º50'37.946"E
	B -32.136660ºS;18.846964ºE	B 32º08'11.976"S;18º50'49.070E
	C -32.137598ºS;18.846378ºE	C 32º08'15.353"S;18º50'46.961"E
	D -32.135824ºS;18.842260ºE	D 32º08'08.966"S;18º50'32.136"E

PROJECT DESCRIPTION

Smit Grondwerke (Pty) Ltd (Mr Tobias Gerhardus Smit & Mr Johannes Adriaan Elias Smit), in collaboration with the landowner, Mr GE Smith, identified a potential 4.9 ha sand mining area currently used for the cultivation of potatoes and/or wheat. The motivation for placing the proposed 4.9 ha mining area over the centre pivots of the landowner was to assist with the reduction of the top sandy soil layer (through mining), whereby the clay content and resultant water holding capacity of the soil will be increased that will assist the farmer with future crop cultivation of the lands. Further to this, the natural vegetation cover of the proposed 4.9 ha area has historically been altered through agricultural practices and no fynbos needs to be disturbed to allow the mining of the area (refer to *i) Details of the development footprint alternatives considered*.).

The mining activity involved the direct winning of sand from the approved footprint. The mining method entailed the loading of sand with a FEL directly onto trucks that transport it to clients. The nature of the operation did not necessitate the establishment of permanent infrastructure on site.

In terms of Section 43(4) of the Mineral and Petroleum Resources Development Act, 2002 (as amended) (hereinafter referred to as the "MPRDA"), 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. Therefore, the 180-day period as contained in Section 43(4) of the MPRDA already commenced upon the lapsing of the 3nd renewal period.

SITE CONDITIONS

Hot and sunny weather conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date:	No environmental incidents were recorded during the audit period.
Incident No:	
Incident:	
How addressed:	
When addressed:	

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:				
National Environmental Management Act, 1998 (Act No 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended 2017).	5	-	Compliant	DMRE issued the operation with an environmental authorization (EA) on 29 August 2016.
Copy of the environmental authorisation (EA) and EMPR available on site.	5	-	Compliant	A copy of the EA and EMPR is available in a site file at the Permit Holders offices in Clanwilliam.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002).	5	-	Compliant	DMRE issued the operation with a mining permit (MP) on 10 March 2022. The third renewal of the permit was acknowledged by DMRE in 26 Jan 2024. Mining permit has lapsed in March 2025.
Mining permit (MP) available on site.	5	-	Compliant	A copy of the MP and EMPR is available at the Permit Holders offices in Clanwilliam.
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004).	N/A	-	-	The operations at the sand mine does not trigger the NEM:AQA, 2004.

Description	Compliance score	non-compliance Score	Status	comments
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008).	5	-	Compliant	Although the operations do not require a waste use licence, refuse generated at the mine is handled in accordance with the NEM:WA, 2008.
National Water Act, 1998 (Act 36 of 1998).	N/A	-	-	The operations at the sand mine does not trigger the NWA, 1998.
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA).	5	-	Compliant	At the time of the inspection no listed invasive plant species were noted within the mining footprint.
Hazardous Substances Act, 1973 (Act 15 of 1973).	N/A	-	-	No chemicals or hazardous substances are kept/stored at the mine.
Soil & Agricultural potential (Empr pg 23-24, 52-60)				
Topsoil stripping done (upper 50 cm)	5	-	Compliant	Complete.
Topsoil storage/stockpiling (<2 m high)	5	-	Compliant	Area is rehabilitated.
Topsoil stockpiles protected and not used for any purpose other than rehabilitation.	5	-	Compliant	Rehabilitation complete

Description	Compliance score	non-compliance Score	Status	comments
Surface slope maintained so the excavation is free draining.	5	-	Compliant	Mining site is closed and rehabilitated.
Areas with erosion reinstated.	5	-	Compliant	N/A
Steep slopes reduced to a minimum and profiled to blend with the surrounding topography.	5	-	Compliant	Area blended in well with surroundings.
Topsoil returned to rehabilitated area.	5	-	Compliant	Rehabilitation complete
Topsoil spreading done at the end of the rainy season.	5	-	Compliant	
Soil stabilised upon topsoil spreading.	5	-	Compliant	
Rehabilitated area monitored for erosion.	5	-	Compliant	
Biodiversity (empr pg 43, 44, 61):				
Aliens & weeds controlled on site.	5	-	Compliant	Mining Complete

Description	Compliance score	non-compliance Score	Status	comments
All animals, birds and reptiles protected on site	5	-	Compliant	N/A
Excavation providing an escape route for trapped animals.	5	-	Compliant	Mining Complete and rehabilitated
Excavation daily inspected for signs of trapped animals.	5	-	Compliant	
Rehabilitated area covered with natural vegetation as required in the rehabilitation plan.	5	-	Compliant	
Air quality & noise (empr pg 44 – 46, 62):				
Dust suppression implemented.	5	-	Compliant	N/A
Footprint of cleared areas minimised.	5	-	Compliant	Only one block of +/- 1.13ha was mined during the permit period, and it is now considered rehabilitated.
Mining blocks rehabilitated as soon as mining is complete.	5	-	Compliant	

Description	Compliance score	non-compliance Score	Status	comments
Speed of vehicles controlled to lessen dust generation and road deterioration	5	-	Compliant	N/A (Mining seized and area rehabilitated.)
Activities reduced during strong winds.	5	-	Compliant	
Noise control implemented (no loud music).	5	-	Compliant	
Mining equipment serviced regularly to ensure noise emissions are minimized	5	-	Compliant	
Operation hours restricted as stipulated in the EMPR.	5	-	Compliant	
Waste management (empr pg (44, 47, 94-97/100,111,149)				
Workers provided with environmental awareness training.	5	-	Compliant	Workers were trained and informed of the EA conditions. Mining has now seized and the permit area of 1.13ha has been rehabilitated.
Waste collected in sealable containers.	5	-	Compliant	No waste generated Mining Complete

Description	Compliance score	non-compliance Score	Status	comments
Site free of day-to-day litter.	5	-	Compliant	As evidenced by the site photographs, the area is neat and clean, and has been accepted by the landowner, with an indemnity letter attached hereto.
General waste dumped at a recognised landfill site.	5	-	Compliant	Waste was removed to the Permit Holders offices in Clanwilliam where it was incorporated into the municipal waste removal system. However, no waste is being generated as the mine is no longer operational and has been closed.
Hazardous waste removed by a registered waste handling contractor.	N/A	-	-	N/A (Mining Complete)
Spillages not disposed of into the environment, ditches, drains or water courses.	N/A	-	-	N/A (Mining Complete)
No waste stockpile area allowed outside the boundaries of the mining area.	5	-	Compliant	The mine has been rehabilitated and closed, and the area is deemed acceptable by the landowner for the continuation of potato cultivation.

Description	Compliance score	non-compliance Score	Status	comments
Proper sanitation facilities available to employees.	5	-	Compliant	a Bastech toilet hire was used but has been removed upon closure of mine. No infrastructure remains on the site.
Chemical toilet secured to the ground.	5	-	Compliant	Toilet removed, Mine closed.
Heritage resources (empr pg 42,50,60-61,75):				
Archaeological-, heritage and/or cultural remnants protected.	N/a	-	-	No archaeological or cultural remnants were discovered during the audit period.
socio-economic matters (empr pg 61):				
Complaints register on site.	5	-	Compliant	No complaints received throughout the life of the mine.
Notice board (with contact details) erected and maintained at the site entrance.	5	-	Compliant	N/A (Mining Complete – currently still on entrance gate soon to be removed.
Mining area rehabilitated to post-mining land use capability.	5	-	Compliant	Only one mining block of +/- 1.13ha was mined and rehabilitated to post landuse capability.

Description	Compliance score	non-compliance Score	Status	comments
Management of fuel and Hazardous products (empr pg 196):				
Sealed drip trays used and managed on site.	N/a	-	N/a	N/A Mining Complete -
Mining equipment mechanically sound without visible oil leaks.	N/a	-	N/a	N/A Mining Complete -
Regular maintenance of mine equipment done in Clanwilliam at the Permit Holders offices.	N/a	-	N/a	N/A Mining Complete -
Complete oil spill kit/absorbent material available on site.	N/a	-	N/a	N/A Mining Complete -
Hazardous material stored within a bunded area (110% capacity).	N/a	-	N/a	N/A Mining Complete
Management of fuel and oil spills	N/a	-	N/a	N/A (Mining Complete -.
Fire Management (empr pg 197):				

Description	Compliance score	non-compliance Score	Status	comments
Firefighting equipment available on-site (2x rubber beaters and 1 fire extinguisher).	N/a	-	N/a	N/A Mining Complete -.
Fires contained to facilities specially constructed for the purpose	N/a	-	N/a	N/A Mining Complete -.
Employees trained in firefighting	N/a	-	N/a	N/A Mining Complete -.
Major fires or explosions reported.	N/a	-	N/a	N/A Mining Complete -.
mine & equipment Management (Empr pg 58):				
Mining area demarcated with visible beacons	5	-	Compliant	Mining Complete
Is the contractor implementing good visual and housekeeping standards.	5	-	Compliant	Mining Complete and area left in a pristine condition. -.
Mining contained to designated mining area.	N/a	-	N/a	Mining activities were contained within the boundary area, a small section was left undisturbed that formed part of the initial approved area.

Description	Compliance score	non-compliance Score	Status	comments
Unnecessary surface disturbance avoided.	5	-	Compliant	No unnecessary disturbances took place.
Incident register available on site.	5	-	Compliant	The incident registers were kept throughout the life of the mine and no complaints were received during this time. Proof of registers included in photo report.
access roads, vehicles & transporting of material (empr pg 24,27):				
Access road maintained.	5	-	Compliant	Access road was well maintained, proof in below photo report.
Movement of project related vehicles and machinery restricted to the approved mining area. No crisscrossing through undisturbed areas.	N/a	-	N/a	N/A Mining Complete -.
Sand transported from site by the Permit Holder. No clients collecting directly from the mine.	N/a	-	N/a	N/A Mining Complete -.
Speed limit enforced (40 km/h) along the access road.	N/a	-	N/a	N/A Mining Complete -.
employee and safety management (empr pg 129):				

Description	Compliance score	non-compliance Score	Status	comments
Workers inducted and informed of EMPr conditions	5	-	Compliant	All site workers did receive induction training.
Proof of training available	3	-	Partially Compliant	Training proof included in photo report.
Workers provided with PPE	N/a	-	N/a	N/A Mining Complete -.
Are there signs present, indicating the mining site and speed restrictions.	5	-	Compliant	N/A Mining Complete -.
Effective access control to prevent unauthorised entry.	5	-	Compliant	The mining area is within the farm that is fenced with lockable gates.
The Holder of EA must appoint an ECO, provide his name and contact detail to the RM and ensure that the ECO is always available on site.	3	-	Compliant	A ECO /site manager was appointed but the notification was not sent to Dmre. Proof of ECO in photo report.

Description	Compliance score	non-compliance Score	Status	comments
Annual EAR (environmental audit report) submitted to DMRE.	5	-	Compliant	Annual submission was done to Dmre.
Annually assess the environmental liabilities of the operation regarding the financial provision for rehabilitation.	5	-	Compliant	The 2024 EAR was accompanied with the 2024 FP calculation and has been calculated not exceeding the value.
Notify DMRE within 24 hours of any incident occurring.	N/A	-	-	No incident occurred during the life of mine.
Mining area fenced off with lockable gates.	5	-	Compliant	The entrance gate to the farm is locked and was opened by the permit holder.
Water proof, durable and legible notices in at least 3 official languages displayed at the entrance to the site.	5	-	Compliant	
Emergency preparedness plan available.	5	-	Compliant	The emergency preparedness plan was kept in environmental site file.

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)*:**

Date of previous EAR/EPA:	January 2024
Proof of submission to DMRE available:	Proof of submission included in photo report below and available at the mining permit holders offices.
EAR/EPA compiled by independent person with environmental auditing expertise:	The 2024 EAR was compiled by Mrs. M Saal from Greenmined Environmental (Pty) Ltd.
Potential and registered I&AP's notified within 7 days of the submission date, and report available on publicly accessible website	The EAR is available at the Permit Holders office in Clanwilliam.

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

GENERAL REPORT

Compliance of the mining site with the EMPR (2019) was reviewed during the site assessment. The mining area recorded a compliance score of 100% for the audit period.

The Mining permit for Smit Grondwerke (Pty) Ltd on the remainder of portion 2, Farm 199, Clanwilliam, Western Cape province, lapsed in March and is now rehabilitated.

The rehabilitated Process included:

- Concurrent mining and rehabilitation per hectare of which only 1.13ha was mined and rehabilitated.
- Shaping and profiling of the final slopes and replacing topsoil.
- Due to the intended land use, the farm owner has requested that no seeding be undertaken, as the area is required for potato cultivation. An indemnity letter from the landowner is included in the photo report below.

Rehabilitated Areas:

- Mining permit area – Slopes shaped and profiled topsoil replaced, and slopes revegetated in accordance with the landowners requirements.
- Rehabilitation complete. Landowner needs the area to revert to agricultural use for the potato cultivation.

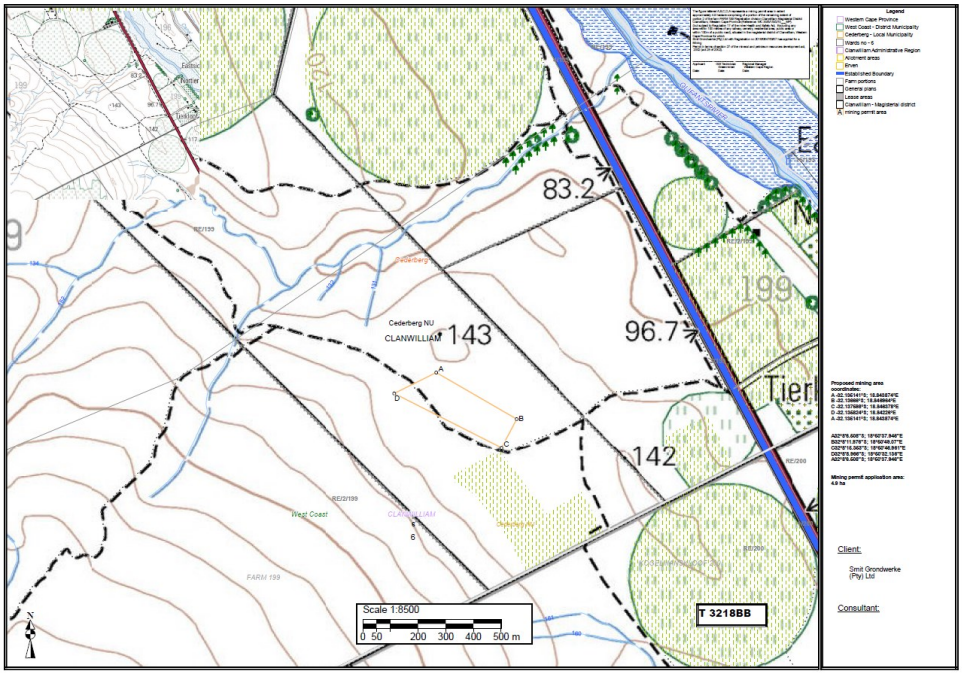


Figure 1: Image taken from the Basic Assessment Report, 2019 showing the locality of the mining permit area.

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

All mining activities have been ceased and rehabilitated in accordance with the Rehabilitation Plan. It should be noted that the land will revert to potato cultivation, and no seeding is required. Please refer to the landowner's indemnity letter in support hereof.

Figure 2: Image taken from the Basic Assessment Report, 2019 showing the five mining blocks. Mining only occurred in the 1st block. The approved mining area was 4.9 ha in extent with **only ±1.13 ha** *thereof disturbed. The Rehabilitation, Decommissioning and Mine Closure Plan details the closure objectives, -actions, relinquishment criteria, monitoring, auditing and reporting commitments for the earmarked area. . The green polygon was added to indicate the affected and rehabilitated areas.*

At the time of reporting, the mining permit area was confirmed to be neat and clear of litter and well rehabilitated.

The access road was well maintained,

The permit holder now wishes to apply for a closure certificate for the mining permit and this report accompanies the closure application.

DOCUMENT CHECKLIST:

- Environmental Authorisation - Present
- Mining Permit - Present
- Approved EMPR - Present
- Regulation 2(2) Mine Plan - Present
- Financial Provision Calculation - Present
- Environmental Assessment Report - Present

Incidents register	-	Present
Complaints Register	-	Present
Environmental Awareness Training	-	Present as part of the EMPR
Emergency Preparedness Plan	-	Present
Waste Registers	-	Present
Environmental Audit Checklist	-	Present

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 2024 quantum calculation compiled for the Sand Mine was reviewed as part of the (2024) annual environmental audit and the financial provision amount came to **R 17,999.15 .**

The 2024 financial provision does not exceed the value of the guarantee in place with the DMRE (R 70 000), and therefore the permit holder does not have to provide a shortfall. The financial provision calculation will be submitted to DMRE with this EAR/EPA.

ECO SIGNATURE

NAME:	SIGNATURE:	DATE:
Murchellin Saal		25 April 2025

PHOTOGRAPHS

ENTRANCE FROM MAIN FARM GATE

REHABILITATED MINING AREA

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

ECO DETAILS

Ref No.: WC 30-5-1-3-2-10219 MP

Department of Mineral Resources
Atterbury House
Cnr Riebeeck Street and Lower Burg Street
Cape Town
Western Cape

25 January 2022

Attention: Ms Sonia Mothodini

LETTER OF ENACTMENT FOR MINING PERMIT WC 30-5-1-3-2-10219 MP ON A PORTION OF REMAINING EXTENT OF PORTION 2 OF THE FARM 199RD, CLANWILLIAM, WESTERN CAPE PROVINCE.

This letter serves to inform the Department of Mineral Resources that the applicant, Smit Grondwerke (Pty) Ltd started the operation in October 2021.

The holder of the sand mining permit appointed Greenmined Environmental (Pty) Ltd to inform the DMR that the on-site ECO of the operation, in accordance with clause 4.10 of the Environmental Authorisation, is Mr TG Smit with ID number 8009105173085.

Contact Details:

- Tel: 027 482 1701
- Cell: 082 895 6923
- Email: debiteure@smiting.co.za

Annual inspections and reports will be submitted to the DMR and will be done by Greenmined Environmental in accordance with the Environmental Authorisation.

Consultant details:

- Mrs. Murchellin Saal
- Cell: 076 792 6327
- Email: Murchellin.s@greenmined.co.za

Should the above information need to be submitted to any other entity or party, kindly provide writer hereof with the necessary details.

the goal isn't to live forever, it is to protect a planet that will

Greenmined Environmental (Pty) Ltd |Tel: 021 851 2673 | Fax: 086 546 0579
Unit M01, Office No 36, AECI Site, Baker Square, Paardevlei, De Beers Avenue, Somerset West, 7130
Postnet Suite 62, Private Bag x15, Somerset West, 7129
Directors: S Smit; R L Shedlock; C Weideman | Reg No: 2012/055565/07 | VAT No. 4040263032

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

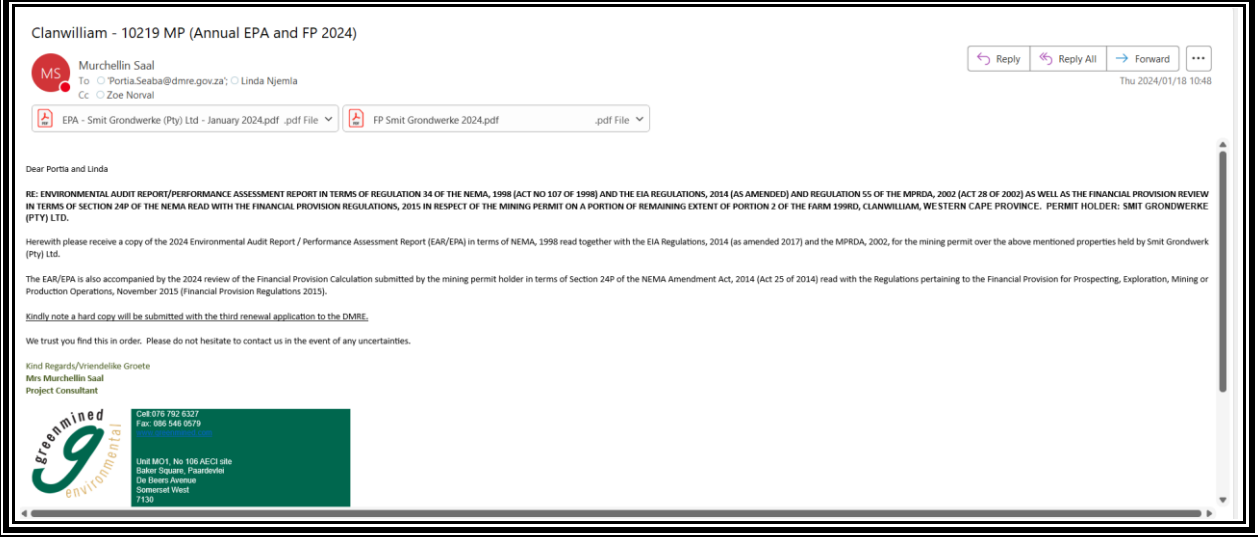
TRAINING PROVIDED 2018

CONFIRMATION OF CONTRACTORS AWARENESS OF EMP

MINING PERMIT TO MINE 4.9 ON A PORTION OF REMAINING EXTENT OF PORTION 2 OF THE FARM 199RD, CLANWILLIAM, WESTERN CAPE PROVINCE

NAME OF PERSON	INDUCTION MEETING	DATE OF MEETING
Bernard Smit	Environmental Induction	28 Januarie 2022
Chrisjan Nel	Environmental Induction	28 Januarie 2022
Eugene Fortuin	Environmental Induction	28 Januarie 2022

PROOF OF SUBMISSION TO DMRE -18 JANUARY 2024



Clanwilliam - 10219 MP (Annual EPA and FP 2024)

MS Murchellin Saal
To 'Portia.Seaba@dmre.gov.za'; Linda Njemla
Cc Zoe Norval

Reply | Reply All | Forward | ...
Thu 2024/01/18 10:48

EPA - Smit Grondwerke (Pty) Ltd - January 2024.pdf .pdf File
FP Smit Grondwerke 2024.pdf .pdf File

Dear Portia and Linda

RE: ENVIRONMENTAL AUDIT REPORT/PERFORMANCE ASSESSMENT REPORT IN TERMS OF REGULATION 34 OF THE NEMA, 1998 (ACT NO 107 OF 1998) AND THE EIA REGULATIONS, 2014 (AS AMENDED) AND REGULATION 55 OF THE MPRDA, 2002 (ACT 28 OF 2002) AS WELL AS THE FINANCIAL PROVISION REVIEW IN TERMS OF SECTION 24P OF THE NEMA READ WITH THE FINANCIAL PROVISION REGULATIONS, 2015 IN RESPECT OF THE MINING PERMIT ON A PORTION OF REMAINING EXTENT OF PORTION 2 OF THE FARM 199RD, CLANWILLIAM, WESTERN CAPE PROVINCE. PERMIT HOLDER: SMIT GRONDWERKE (PTY) LTD.

Herewith please receive a copy of the 2024 Environmental Audit Report / Performance Assessment Report (EAR/EPA) in terms of NEMA, 1998 read together with the EIA Regulations, 2014 (as amended 2017) and the MPRDA, 2002, for the mining permit over the above mentioned properties held by Smit Grondwerk (Pty) Ltd.

The EAR/EPA is also accompanied by the 2024 review of the Financial Provision Calculation submitted by the mining permit holder in terms of Section 24P of the NEMA Amendment Act, 2014 (Act 25 of 2014) read with the Regulations pertaining to the Financial Provision for Prospecting, Exploration, Mining or Production Operations, November 2015 (Financial Provision Regulations 2015).

Kindly note a hard copy will be submitted with the third renewal application to the DMRE.

We trust you find this in order. Please do not hesitate to contact us in the event of any uncertainties.

Kind Regards/Vriendelike Groete
Mrs Murchellin Saal
Project Consultant

greenmined environmental
Cell:076 792 6327
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Unit MO1, No 106 AECI site
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3. ENVIRONMENTAL RISK REPORT

{Regulation 60}

Site Names	Remainder of Portion 2 of farm 199, Clanwilliam, Western Cape Province.	**Date of Commencement:**	2019 (10219 MP)
Reference Numbers:	*WC 30/5/1/3/2/10219 MP* 06/2020MP	**Inspection Date:**	N/A Supporting photographs were provided and discussed with landowner and client.
Authorisation Holder:	Mr. TG Smit	**Report Number:**	Closure Report
Environmental Control Officer:	Murchellin Saal	**Other Authorisations:**	N/A

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

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:

Environmental Significance = Overall Consequence x 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.

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/	Low cost to mitigate	Substantial cost to mitigate/ Potential to mitigate impacts/	High cost to mitigate	Prohibitive cost to mitigate/ Little or no mechanism to mitigate impact Irreversible

	Easily reversible		Potential to reverse impact		
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.

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/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.

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**

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 (Subtotal divided by 2)	**3**

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)	A 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 determine potential increase in risk. Where possible improve	Improve management measures to reduce risk.

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.

Sloping and Landscaping:

SLOPING AND LANDSCAPING DURING REHABILITATION:

Soil erosion

Rating: Insignificant risk **Degree of Mitigation: Fully Mitigated**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

Dust nuisance caused during sloping and landscaping activities

Rating: Insignificant risk **Degree of Mitigation: Partial**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

Noise nuisance caused by machinery

Rating: Insignificant risk **Degree of Mitigation: Partial**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

Contamination of area with hydrocarbons or hazardous waste materials

Rating: Insignificant risk **Degree of Mitigation: Fully Mitigated**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

Infestation of the area by weed and invader plants

Rating: Insignificant risk **Degree of Mitigation: Fully Mitigated**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

REPLACING OF TOPSOIL AND REHABILITATION OF DISTURBED AREA:

Loss of reinstated topsoil due to the absence of vegetation

Rating: Insignificant risk **Degree of Mitigation: Fully Mitigated**

			Consequence			Likelihood	**Significance**
Severity	Duration	Extent		Probability	Frequency		
1	1	1	1	1	1	1	**1**

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 mining area.

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

   No risk classified as uncertain were identified at the mining area

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

RISK	SIGNIFICANCE	STATUS
Soil erosion	Insignificant	Definite
Health and safety risk posed by un-sloped	Insignificant	Definite
Dust nuisance caused during landscaping activities	Insignificant	Definite
Noise nuisance caused by machinery	Insignificant	Definite
Contamination of area with hydrocarbons or hazardous waste materials	Insignificant	Definite
Infestation of the area by weeds and invader plants	Insignificant	Definite

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

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

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

2. CLOSURE PLAN

{Regulation 62}

Site Names	Remainder of Portion 2 of farm 199, Clanwilliam, Western Cape Province.	**Date of Commencement:**	2019 (10219 MP)
Reference Numbers:	WC 30/5/1/3/2/10219 MP 06/2020	**Inspection Date:**	/A Supporting photographs were provided and discussed with landowner and client.
Authorisation Holder:	Mr. TG Smit	**Report Number:**	Closure Report
Environmental Control Officer:	Murchellin Saal	**Other Authorisations:**	N/A

LOCATION

Location:	Remainder of Portion 2 of the Farm 199, Clanwilliam, Western Cape Province.

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

Map:	

CLOSURE REPORT: MINING OF SAND ON THE REMAINDER OF PORTION 2 OF FARM 199, CLANWILLIAM, WESTERN CAPE PROVINCE.

	DECIMAL DEGREES	DEGREES MINUTES SECONDS
Site coordinates (System LO 23):	A --32.135141ºS; 18.843874ºE	A 32º08'06.508"S;18º50'37.946"E
	B -32.136660ºS;18.846964ºE	B 32º08'11.976"S;18º50'49.070E
	C -32.137598ºS;18.846378ºE	C 32º08'15.353"S;18º50'46.961"E
	D -32.135824ºS;18.842260ºE	D 32º08'08.966"S;18º50'32.136"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 following closure objectives have been proposed for rehabilitation of the area according to the EMP:

Objective 1- Ensure effective rehabilitation the mining permit area:

- The site is to be shaped and sloped so that it is safe for people and animals
- Topsoil to be replaced over the mined areas
- Natural vegetation to be re- established over the previously mined area.

Objective 2 - To minimise pollution or degradation of the environment:

- Ensure that no fuel or oil spills occur in the mining area
- Ensure that no solid waste or rubble is dumped on the site
- Ensure that portable toilets are used

Objective 3 -To minimise impact on the community:

- Ensure that workers remain within the mining permit boundaries
- To operate during normal working hours only
- To minimise the generation of noise and dust
- To minimise impacts on the access road
- To respond rapidly to any complaints received

The environment affected by the mining operations shall be rehabilitated, as far, as is practicable, to its natural status. Land use will be the same as before mining with the same production

regarding potato cultivation. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof.

To ensure minimum impact on drainage, it is important that no depressions are left in the mining floor. A surface slope (even if minimal) must be maintained across the mining floor in the drainage direction, so that the excavation is free draining.

After mining, any steep slopes at the edges of excavations, must be reduced to a minimum and profiled to blend with the surrounding topography. Final slopes should not be steeper than 1:3.

The stockpiled topsoil must then be evenly spread over the area to be rehabilitated.

Topsoil spreading should only be done at a time of year when vegetation cover can be established as quickly as possible afterwards, so that erosion of returned topsoil by both rain and wind, before vegetation is established, is minimised. The best time of year is at the end of the rainy season, when there is moisture in the soil for vegetation establishment and the risk of heavy rainfall events is minimal.

A number of factors will influence the development of vegetation form the freshly placed topsoil.

These include:

1. The soil seed bank
2. Timing and care of harvesting and placement
3. Topography of the rehabilitation areas

Since the rainfall in the area is relatively low and the growing season short, it is recommended to over seed the topsoil using non-persistent commercial agricultural grass seed such as annual Rye grass. This will assist with the rapid stabilisation of the topsoil without persisting in the landscape. The seeding rate should not exceed 10kg of rye grass seed per ha as this will lead to competition with local species.

Maintenance forms a vital part of the successful rehabilitation of post mining environments. The aim of the maintenance is to ensure that localised problems with die back and erosion are addressed early on to prevent large-scale degradation.

The objective would be to rehabilitate the mine area to a 60% match of the surrounding area in terms of:

- Species composition

- Number of plants per m² (irrelevant of size)
- Cover

Information obtained from monitoring must be fed – back into the rehabilitation planning in order to adjust or deficiency or improvement of cost effectiveness of strategies employed.

Evaluation of the species composition of the rehabilitated area at the end of the first growing season will inform the augmentation of the species by means of over seeding with locally collected seed prior to the following winter.

Rehabilitation steps are summarised in the following table:

Rehabilitation Technique	Timeframe and limitations
Shaping of the mine floor and slopes must be allowed for a part of the operational cost. The resulting landscape should be integrated into the current topography.	Topsoil clearing and placement should be done at the end of summer. Non-persistent commercial agricultural grass seed such as annual Rye grass should be used to stabilise the topsoil 10kg seed /hectare. Topsoil harvesting and direct placement should not be done between mid-April and end of September (i.e. in Winter).
Cutting and pruning branches from the local shrubs and restios and spreading these over the area to be rehabilitated. Seeds from these branches and restios will hold the topsoil and sand in place (i.e. protect it from erosion), help to retain moisture in the soil and also initially protect the seedlings of germinating plants.	Cutting and pruning of local shrubs and restios is best done during April and May of each year when the seeds are ready.
If required, wind nets should be installed on the top soiled mine area to prevent wind erosion. Nets can be re-used for up to three years.	Net installation should be left until such time as 60% of the surface area has been covered by vegetation by mid-winter
Seed collection and hand sowing may be required if germination from the topsoil seedbank is inadequate to provide stability after the first winter.	If required, seed collection and hand seeding should be done during April and May of every year. Seed collection should focus on functional species

	to provide initial vegetation cover. Seed requirement is estimated at 10kg/ha.
Maintenance of rehabilitated areas	For 2 years until established. Cover and diversification to be achieved if it failed to manifest after the initial rehabilitation
Continuous maintenance and management of rehabilitated areas until closure.	Areas will increase over time but maintenance will reduce
Monitoring, evaluation and reporting	Monitor plant cover, species richness and landscape functionality

1.2 Closure plan

The requested closure plan is attached as Appendix 1

1.3 Summary of regulatory requirements and conditions for closure

According to the closure process (Regulations 56 to 62) the following regulatory requirements and conditions needs to be addressed by the mining authorisation holder:

Layout Plan:

- A final layout plan is attached as Appendix 1

Demarcating the mining area:

- The beacons, indicating the layout of the site, must be removed at the end of the operations.

Responsibility:

- The environment affected by the mining operations shall be rehabilitated by the holder, as far as is practicable, to its natural state or to a predetermined and agreed to standard or land use which conforms with the concept of sustainable development. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof.
- If operations are to be conducted in an area that has already been disturbed, the holder must reach specific agreement with the Regional Manager concerning the

responsibilities imposed upon himself/herself pertaining to the rehabilitation of the area and the pollution control measures to be implemented.

Rehabilitation of access roads:

- Whenever a mining authorisation is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the authorisation, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to the satisfaction of the Regional Manager.
- Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre mining situation.
- Roads shall be ripped or ploughed, and if necessary, appropriately fertilised (based on a soil analysis) to ensure the regrowth of vegetation. Imported road construction materials which may hamper regrowth of vegetation must be removed and disposed of in an approved manner prior to rehabilitation.
- 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 any deleterious effects on the soil arising from the mining operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification.

Final rehabilitation:

- All infrastructure, equipment, plant, temporary housing and other items used during the mining period will be removed from the site (section 44 of the MPRDA)
- Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be permitted to be buried or burned on the site.
- Final rehabilitation shall be completed within a period specified by the Regional Manager.

1.4 Summary of the results of the environmental risk report

The potential risks as listed in the table below were assessed in the environmental risk report. If the mitigation measures proposed in that report is implemented on site all the risks are deemed to be insignificant.

RISK	SIGNIFICANCE	STATUS
Soil erosion	Insignificant	Definite
Health and safety risk posed by un-sloped	Insignificant	Definite
Dust nuisance caused during landscaping activities	Insignificant	Definite
Noise nuisance caused by machinery	Insignificant	Definite
Contamination of area with hydrocarbons or hazardous waste materials	Insignificant	Definite
Infestation of the area by weeds and invader plants	Insignificant	Definite

1.5 Results of progressive rehabilitation

Topsoil was stockpiled for the minimum possible time by rehabilitating different mining blocks progressively during the mining process

1.6 Description of the methods to decommission each mining component

The following methods were implemented during the decommission and rehabilitation phase of the mining area, in accordance with the closure activities prescribed by the EMP:

Rehabilitation steps are summarised in the following table:

Rehabilitation Technique:

- Shaping of the mine floor and slopes must be allowed for a part of the operational cost. The resulting landscape should be integrated into the current topography.
- Cutting and pruning branches from the local shrubs and restios and spreading these over the area to be rehabilitated. Seeds from these branches and restios will hold the topsoil and sand in place (i.e. protect it from erosion), help to retain moisture in the soil and also initially protect the seedlings of germinating plants.
- If required, wind nets should be installed on the top soiled mine area to prevent wind erosion. Nets can be re-used for up to three years.
- Seed collection and hand sowing may be required if germination from the topsoil seedbank is inadequate to provide stability after the first winter.

- Maintenance of rehabilitated areas
- Continuous maintenance and management of rehabilitated areas until closure.
- Monitoring, evaluation and reporting

Timeframe and limitations

- Topsoil clearing and placement should be done at the end of summer. Non-persistent commercial agricultural grass seed such as annual Rye grass should be used to stabilise the topsoil 10kg seed /hectare.
- Topsoil harvesting and direct placement should not be done between mid-April and end of September (i.e. in Winter).
- Cutting and pruning of local shrubs and restios is best done during April and May of each year when the seeds are ready.
- Net installation should be left until such time as 60% of the surface area has been covered by vegetation by mid-winter
- If required, seed collection and hand seeding should be done during April and May of every year. Seed collection should focus on functional species to provide initial vegetation cover. Seed requirement is estimated at 10kg/ha.
- For 2 years until established.
- Cover and diversification to be achieved if it failed to manifest after the initial rehabilitation
- Areas will increase over time, but maintenance will reduce
- Monitor plant cover, species richness and landscape functionality

Final rehabilitation:

- Rehabilitation of the surface area shall entail landscaping, levelling, top dressing, land preparation, seeding and maintenance, and weed / alien clearing.
    - Rehabilitation of the affected areas was successfully completed.
- All infrastructures, equipment, plant, temporary housing and other items used during the mining period will be removed from the site.
    - The permit holder removed all the infrastructure, equipment and plant that were used during the operational phase, during the decommissioning phase.
- Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining 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.
    - General waste was removed from site and dumped at the recognised landfill site.
    - Hazardous waste was removed by a registered hazardous waste handling contractor.
- Weed / Alien clearing will be done in a sporadic manner during the life of the mining activities. Species regarded as Category 1 weeds according to CARA (Conservation of Agricultural Recourses

Act, 1983 – Act 43; Regulations 15 & 16 (as amended in March 2001) need to be eradicated from the site on final closure.

- The permit holder is committed to control all category 1a and b plants in terms of the NEM:BA Alien and Invasive Species Regulation, 2014 (as amended) for at least the first growth season.

- Final rehabilitation shall be completed within a period specified by the Regional Manager.
- Seeding of the area:

  Once the pit slopes have been shaped and the soil replaced, the initial goal is to establish a good cover of a robust grass that will stabilise the soil and start the accumulation of soil organic carbon. This will be done using a combination of hydro seeding and physical planting of runners to apply a mix of commercial and indigenous species that includes both tufted and creeping species. The plants that were collected during the establishment and operational phases and kept in the designated area will be replanted.

1.7 Long-term management and maintenance expected

- The rehabilitated mining area should be monitored for at least the next two growing seasons.
- It is recommended that the client conduct biannual inspections for the next two years following rehabilitation. During these inspections the footprint should be monitored for any erosion features and areas that have not sufficiently been established with vegetation. If such issues have been observed, prompt actions should be taken (e.g. additional re-seeding, reinstatement of eroded areas and/or the installation of additional erosion control features).
- It is furthermore recommended that the ECO officer conduct a minimum of thwo inspections to determine and confirm whether rehabilitation is occurring at an acceptable rate.

1.8 Financial provision for monitoring, maintenance and post closure management

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 R54 685.63. The 2021 financial provision does not exceed the value of the guarantee in place with the DMRE to the value of (R 65 000), and therefore the permit holder does not have to provide a shortfall.

The following rehabilitation costs were estimated for the closure of the mining area:

- Opencast rehabilitation including final voids and ramps R10 605.11
- 2 to 3 years of maintenance and aftercare R 2 245.00

If the amount for weighing factor 2 (1.05), contingency (10%) and VAT (15%) is added to the above mentioned figures the total amounts to R17,999.15**.**This was deemed to be sufficient for the

rehabilitation of the damage caused by the operation, both at sudden closure or at final, planned closure. The amount was furnished to DMR in the form of a bank guarantee.

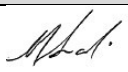
1.9 Sketch plan describing the final and future land use proposal

The mining area is shown in the mining plan attached as Appendix 1.

1.10 Record of interested and affected persons consulted

No written comments or complaints were received from any of the surrounding I&AP's. The signed landowner indemnity forms are included and will from part of the submission to DMRE..

SIGNATURE OF AUTHOR

NAME	SIGNATURE	DATE
Murchellin Saal		25 April 2025

APPENDIX 1

MINING PLAN

APPENDIX 2

LANDOWNER INDEMNITY'S FORMS

APPENDIX 3

EXPERTISE OF EAP

APPENDIX 4

PUBLIC PARTICAPATION REPORT