

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast

Environmental Management Programme

Report Prepared for

Mineral Sands Resources (Pty) Ltd

SRK Report Number 527693/3

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163 EM)



Report Prepared by

 **srk consulting**

May 2018

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Profile and Expertise of EAPs

SRK Consulting (South Africa) Pty Ltd (SRK) has been appointed by Mineral Sands Resources (Pty) Ltd (MSR) to undertake the section 24G process required in terms of the National Environmental Management Act 107 of 1998 (NEMA).

SRK Consulting comprises over 1 300 professional staff worldwide, offering expertise in a wide range of environmental and engineering disciplines. SRK's Cape Town environmental department has a distinguished track record of managing large environmental and engineering projects, extending back to 1979. SRK has rigorous quality assurance standards and is ISO 9001 accredited.

As required by NEMA, the qualifications and experience of the key individual practitioners responsible for this project are detailed below.

Project Director: Christopher Dalgliesh, BBusSc (Hons); MPhil (EnvSci)

Certified with the Interim Board for Environmental Assessment Practitioners South Africa (CEAPSA)

Chris Dalgliesh is a Partner and Principal Environmental Consultant with over 25 years' experience, primarily in South Africa, Southern Africa, West Africa and South America (Suriname). Chris has worked on a wide range of projects, notably in the natural resources, Oil & Gas, waste, infrastructure (including rail and ports) and industrial sectors. He has directed and managed numerous Environmental and Social Impact Assessments (ESIAs) and associated management plans, in accordance with international standards. He regularly provides high level review of ESIAs, frequently directs Environmental and Social Due Diligence studies for lenders, and also has a depth of experience in Strategic Environmental Assessment (SEA), State of Environment Reporting and Resource Economics. He holds a BBusSci (Hons) and M Phil (Env) and is a Certified Environmental Practitioner of South Africa (CEAPSA).

Project Manager: Sue Reuther, BSc Hons (Econ); MPhil (EnviroMan)

CEAPSA

Sue Reuther has more than 15 years of experience researching and working on issues in the environmental assessment sector. She has been involved in a variety of ESIAs as well as strategic State of Environment Reporting, the development of Environmental Management Frameworks and the compilation of Environmental Management Programmes. Her experience also includes due diligence reviews and gap analysis studies against IFC and World Bank Standards. Sue also undertakes socio-economic and resource economic specialist assessments. She holds a BSc (Hons) in Economics and MPhil in Environmental Management and is a CEAPSA.

Statement of SRK Independence

Neither SRK nor any of the authors of this Report have any material present or contingent interest in the outcome of this Report, nor do they have any pecuniary or other interest that could be reasonably regarded as being capable of affecting their independence or that of SRK.

SRK has no beneficial interest in the outcome of the assessment which is capable of affecting its independence.

Disclaimer

The opinions expressed in this report have been based on the information supplied to SRK by MSR. SRK has exercised all due care in reviewing the supplied information, but conclusions from the review are reliant on the accuracy and completeness of the supplied data. SRK does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features as they existed at the time of SRK's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which SRK had no prior knowledge nor had the opportunity to evaluate.

Table of Contents

1. Introduction	1
1.1 Background	1
1.2 Content of the EMPr.....	1
1.3 Description of Activities (Affected Areas).....	3
1.3.1 Expansion of Processing Area	3
1.3.2 New Process Water Dam.....	3
1.4 Identification of Impacts	3
2. Measures Applicable to the Operational Phase.....	3
3. Measures Applicable to the Closure Phase	13

List of Tables

Table 1-1: Content of the EMPr as prescribed by the EIA Regulations, 2014.....	2
Table 1-2: Impacts of the activities.....	3
Table 2-1: Environmental management and mitigation measures that must be implemented during the <i>Operational Phase</i>	4
Table 3-1: Environmental management and mitigation measures that must be implemented during the <i>Closure Phase</i>	14

List of Appendices

Appendix A: Locality Map

Acronyms and Abbreviations

DMR	Department of Mineral Resources
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
MSR	Mineral Sands Resources (Pty) Ltd
NEMA	National Environmental Management Act 107 of 1998 as amended
S24G	Section 24G
SRK	SRK Consulting (South Africa) (Pty) Ltd

Glossary

Activity	An activity or operation carried out as part of the construction or operation of the power plant
Aspect	An action, event, product or service, occurring as a component or result of an activity, which interacts with the existing environment (or which results in impacts to it)
Community	Those people who may be impacted upon by the construction and operation of the project. This includes neighbouring landowners, local communities and other occasional users of the area.
Contractor	Any company appointed by the Proponent to undertake construction or related activities on site, and will include the main Contractor, as well as any Sub-Contractors.
Construction Phase	The stage of project development comprising site preparation as well as all construction activities associated with the development.
Contaminated water	Water contaminated by activities on site, e.g. concrete water and run-off from plant / personnel wash areas.
Environment	The external circumstances, conditions and influences that surround and affect the existence and development of an individual, organism or group. These circumstances include biophysical, social, economic, historical and cultural aspects.
Environmental Authorisation	The authorisation by a competent authority of a listed activity or specified activity in terms of NEMA.
Environmental Impact Assessment	A process of evaluating the environmental and socio-economic consequences of a proposed course of action or project
Environmental Management Measures	Requirements or specifications for environmental management, as presented in the EMPr, some of which are based on the mitigation measures identified in the EIA Report (in this case the BAR).
Hazardous substance	A substance (including materials and waste) that can have a deleterious (harmful) effect on the environment and those substances declared hazardous substances in terms of the Hazardous Substances Act 15 of 1973.
Impact	A change to the existing environment, either adverse or beneficial, that is directly or indirectly due to the development of the project and its associated activities.
Method Statement	A mandatory written submission by the Contractor to the ERP setting out the plant, materials, labour and method the Contractor proposes using to carry out an activity.
Mitigation Measures	Actions identified in the BAR to manage (avoid, minimise or optimise) potential environmental impacts which may result from the development.
Operational Phase	The stage of the works (including maintenance) following the Construction Phase, during which the development will function or be used as anticipated in the Environmental Authorisation.
Performance indicator	A measurable indicator of the outcome of environmental management, used to assess the success with which mitigation measures have been implemented. Often captures the results of several different monitoring activities.

Phase	A defined period during the life of the power plant project, e.g. the construction and operations phases.
Proponent	The person or organisation implementing the project.
Resources	The personnel, financial, equipment and technical requirements necessary for the successful completion of mitigation measures and for monitoring activities.
Schedule	The schedule or deadline for completion of each mitigation measure, which are recorded to ensure that mitigation measures are implemented in good time and in the correct sequence.
Solid waste	All solid waste including construction debris, chemical waste, broken / redundant equipment, oil filters, wrapping materials, timber, tins and cans, drums, wire, nails, food and domestic waste (e.g. plastic packets and wrappers).
Sub-Contractors	A Sub-Contractor is any individual or Contractor appointed by the main Contractor, to undertake a specific task on site.

1. Introduction

1.1 Background

Mineral Sands Resources (Pty) Ltd (MSR) owns and operates the Tormin Mineral Sands Mine (Tormin Mine) on the West Coast of South Africa, near Lutzville. The mine holds two Mining Rights (MR162 and MR163) and an approved Environmental Management Programme (EMPr), to mine Valuable Heavy Minerals.

In January 2017, MSR applied for Environmental Authorisation (EA) for the proposed extension of Tormin Mine through an Environmental Impact Assessment (EIA) process in terms of the National Environmental Management Act 107 of 1998 (NEMA), undertaken by SRK Consulting (South Africa) (Pty) Ltd (SRK). On 22 November 2017, DMR refused the EA at the Scoping Phase, citing a requirement to undertake a section 24G (s24G) process in terms of NEMA for the rectification of unlawful activities.

MSR appointed SRK to undertake the s24G application process in terms of NEMA and Regulations 698 of 2017 (GN R698). The pertinent unlawful activities identified in an EMPr Performance Assessment of Tormin Mine conducted by Jomela Consulting (Pty) Ltd in February 2018, were as follows:

- Clearing an additional 3.9 ha area adjacent to and inland of the processing (plant) facilities, to be (and now) used for stockpiling; and
- Construction of a 2.2 ha dam south-east of the processing facilities, with total associated vegetation clearance (including the dam) of 4.1 ha (of which 1.9 ha is under rehabilitation).

SRK submitted the s24G documentation to DMR on behalf of MSR on 19 March 2018. DMR issued a letter dated 5 April 2018 to MSR, acknowledging the s24G applications and instructing MSR to include an EMPr (incorporating mitigation measures) in the s24G applications in terms of Section 24G (1)(vii) of NEMA and release the document for a 30-day public comment period.

This EMPr demonstrates how environmental management and mitigation measures will be implemented for the (completed) expansion and utilisation of the processing area and the new process water dam ("the affected areas") during the following phases:

- ***The Operational Phase:*** These mitigation measures are applicable during the long-term operation and maintenance of the affected areas and must be implemented by MSR. These mitigation measures are presented in Section 2.
- ***The Closure Phase:*** These mitigation measures are applicable during the decommissioning and closure phase of the affected areas and must be implemented by MSR. These mitigation measures are presented in Section 3.

1.2 Content of the EMPr

The EIA Regulations 2014, promulgated in terms of NEMA (GN R982, as amended by GN R326) prescribe the required content in an EMPr. These requirements and the sections of this EMPr in which they are addressed, are summarised in Table 1-1.

Table 1-1: Content of the EMPr as prescribed by the EIA Regulations, 2014

GN 982 Ref.:	Item	Section Ref.:
(a)	Details of:	
(a) (i)	The person who prepared the EMPr	Page i
(a) (ii)	Expertise of that person to prepare an EMPr	Page i
(b)	A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;	1.3
(c)	A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating areas that should be avoided, including buffers;	App A
(d)	A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including-	
(d)(i)	Planning and design;	n/a
(d)(ii)	Pre-construction activities;	n/a
(d)(iii)	Construction activities	n/a
(d)(iv)	Rehabilitation of the environment after construction and where applicable post closure; and	1.4
(d)(v)	Where relevant, operation activities;	1.4
(f)	A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraphs (d) will be achieved, and must, where applicable, include actions to-	
(f)(i)	Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;	2, 3
f(ii)	Comply with any prescribed environmental management standards or practices;	2, 3
f(iii)	Comply with any applicable provisions of the Act regarding closure, where applicable; and	2, 3
f(iv)	Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable;	3
(g)	The method of monitoring the implementation of the impact management actions contemplated in paragraph (f);	2, 3
(h)	The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);	2, 3
(i)	An indication of the persons who will be responsible for the implementation of the impact management actions;	2, 3
(j)	The time periods within which the impact management actions contemplated in paragraph (f) must be implemented;	2, 3
(k)	The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f)	2, 3
(l)	A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations;	2, 3
(m)	An environmental awareness plan describing the manner in which-	
(m)(i)	The applicant intends to inform his or her employees of any environmental risk which may result from their work; and	2, 3
(m)(ii)	Risks must be dealt with in order to avoid pollution or the degradation of the environment; and	2, 3
(n)	Any specific information that may be required by the competent authority.	n/a

The environmental management and mitigation measures identified in this EMPr are informed by and, wherever possible, replicate the environmental management and mitigation measures included in the

approved EMPr for Tormin Mine compiled by GCS (Pty) Ltd (GCS, 2012), since it is very unlikely that many new measures will be required to manage the affected areas.

1.3 Description of Activities (Affected Areas)

1.3.1 Expansion of Processing Area

A 3.9 ha area inland of and adjacent to the authorised processing plant area (refer to Locality Plan, Appendix A) was cleared of vegetation to accommodate the stockpiling of garnet (with stackers), ilmenite (with a stacker) and part of the Run-of-Mine stockpile. A haul road also traverses this area.

1.3.2 New Process Water Dam

A dam was built to the south-east of the Tormin Mine processing area (refer to Locality Plan, Appendix A). The dam is currently used to store process water (seawater) utilised in the Secondary Concentration Plant. The storage capacity of the dam is greater than 50 000 m³ and the highest part of the dam wall (sea-facing wall) is approximately 7 m high (toe to crest). An area of 4.1 ha comprising the dam and area surrounding the dam, was cleared of vegetation. The dam occupies approximately 2.2 ha, and MSR is in the process of rehabilitating the remaining 1.9 ha that was cleared surrounding the dam (refer to Locality Plan, Appendix A).

1.4 Identification of Impacts

A summary of the impacts of the unlawful activities identified and assessed in the s24G application is presented in Table 1-2. Additional details on the nature of these impacts are provided in Appendix H of the s24G application (SRK Consulting Report No: 527693/1, April 2018).

Table 1-2: Impacts of the activities

Impact	Description	Impact Status
Socio-economic	Loss of land capability	Insignificant
	Investment in and contribution to the economy	Insignificant
	Increased employment, income and skills development	Insignificant
Biodiversity	Loss of vegetation and Species of Conservation Concern	Low (-ve)
	Disturbance to fauna and loss of habitat	Low (-ve)
Sense of Place and/or Heritage	Altered sense of place and visual intrusion	Very Low (-ve)
	Loss of heritage resources	Very Low (-ve)
Pollution	Impaired human health from increased pollution concentrations	Insignificant
	Increased nuisance dustfall rates associated with construction activities	Insignificant
	Increased noise and vibration levels	Insignificant
	Groundwater contamination	Very Low (-ve)

2. Measures Applicable to the Operational Phase

The environmental management and mitigation measures that must be implemented for the affected areas during the operational phase, as well as responsibilities and timelines for the implementation of these measures and monitoring thereof, are laid out in Table 2-1 below.

Table 2-1: Environmental management and mitigation measures that must be implemented during the *Operational Phase*

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
Authorisations	1.	Ensure that all required licences and permits are maintained on site. Implement all management and monitoring measures stipulated in these licences and permits.	• MSR	• Throughout operations	• Keep record of all permits, licences and authorisations	• Required licences/permits on file
	2.	Confirm registration of the new process water dam with the Department of Water and Sanitation.		• Immediately	• Check registration certificate	• Registration certificate on file
Environmental awareness training	3.	Provide environmental awareness training to all personnel on site at the start of their employment and frequently throughout their employment. Training should include discussion of: <ul style="list-style-type: none"> • Potential impact of waste and activities on the environment; • Suitable disposal of waste and litter; • Response to environmental pollution; • Key measures in the EMPr relevant to worker's activities; and • How incidents and suggestions for improvement can be reported. Ensure that all attendees remain for the duration of the training and on completion sign an attendance register that clearly indicates participants' names.	• MSR	<ul style="list-style-type: none"> • Before workers start working on-site • Throughout operations 	<ul style="list-style-type: none"> • Check training attendance register • Observe whether activities are executed in line with EMPr requirements 	<ul style="list-style-type: none"> • Proportion of workers that completed environmental training • Compliance of workers with EMPr
Vegetation management	4.	Delineate the affected areas and inspect the boundary regularly (weekly).	• MSR	• Throughout operations	• Visual inspection	• Size of area disturbed

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	5.	Designate undisturbed areas outside the approved boundary as "No Go" areas and ensure that no vegetation is removed or disturbed outside the delineated boundary.				outside approved boundary • Alien Plant Management Plan • Extent of alien vegetation
	6.	Monitor the No Go area weekly to identify any transgressions or contamination from, for example, material / dust emanating from the stockpiles.				
	7.	Limit the number of vehicles allowed in the affected areas and restrict the movement of these vehicles to designated roads.				
	8.	Undertake regular monitoring for alien plants within the affected areas.				
	9.	Conduct regular alien clearing using the best-practice methods for the species concerned. Avoid using herbicides as far as possible.				
Soil management	10.	Limit the number of vehicles allowed in the affected areas and restrict the movement of these vehicles to designated roads.	• MSR	• Throughout operations	• Visual inspection	• Extent of erosion • Number of spills of hazardous materials, including waste materials • Cost of cleaning up spills
	11.	Monitor and maintain access roads and pipelines to reduce erosion.				
	12.	Rehabilitate disturbed areas incrementally and as soon as possible, not necessarily waiting until completion of the Operational Phase.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	13.	Keep spill containment and clean-up equipment at all work sites and for all polluting materials used at the Mine.				• Evidence of contamination and leaks
	14.	Clean up any spills immediately through containment and removal of free product and appropriate disposal of contaminated soils.				
Fauna management	15.	Limit vehicle speeds to 35 km/h in the affected areas.	• MSR	• Throughout operations	• Visual inspection	<ul style="list-style-type: none"> • Number of animals harmed • Incidence of animals found in trenches / new process water dam
	16.	Designate undisturbed areas outside the approved boundary as "No Go" areas and ensure that no vegetation is removed or disturbed outside the delineated boundary.				
	17.	Limit the number of vehicles allowed in the affected areas and restrict the movement of these vehicles to designated roads.				
	18.	Prohibit employees from entering the affected areas outside shift hours.				
	19.	Prohibit unnecessary driving at night.				
	20.	Do not harm, catch or kill animals by any means, including poisoning, trapping, shooting, setting of snares and egg collecting.				
	21.	Inspect the new process water dam on a daily basis for animals that may have fallen or become trapped.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	22.	Keep the affected areas clear of litter and especially plastic, twine and string.				
Hazardous materials	23.	Ensure hazardous materials (especially fuel) are stored in suitable hazardous material storage facilities constructed from impermeable materials. The storage facilities must have bund containment capacity equal to 110% of the largest container.	• MSR	• Throughout operations	• Visual inspection of hazardous materials handling and storage areas	<ul style="list-style-type: none"> Number of incidents of non-compliance with safety procedures concerning hazardous materials, including waste materials Number of spills of hazardous materials, including waste materials Cost of cleaning up spills Evidence of contamination and leaks
	24.	Ensure that contaminants are not placed or handled directly on the ground (e.g. mix cement on plastic sheeting).				
	25.	Keep spill containment and clean-up equipment at all work sites and for all polluting materials used at the Mine.				
	26.	Clean up any spills immediately through containment and removal of free product and appropriate disposal of contaminated soils.				
Waste management	27.	Include the affected areas in the Integrated Waste Management Plan.	• MSR	• Throughout operations	• Visual inspection of waste disposal areas	<ul style="list-style-type: none"> Presence of litter Availability of rubbish bins and skips Degree to which rubbish bins and skips are filled
	28.	Implement waste minimisation principles and suitable waste handling and disposal protocols.				
	29.	Collect all waste in marked bins and/or skips.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	30.	Collect recyclables and scrap metal waste separately and deliver these to suitable facilities or arrange for collection.				<ul style="list-style-type: none"> • Total volume of general and hazardous waste storage capacity • Total volume of general and hazardous waste stored on site • Degree to which different waste is separated • Frequency of waste collection
	31.	Provide separate bins for hazardous / polluting materials (hydrocarbons, chemicals, batteries) and mark these clearly. Store hazardous / polluting materials on impermeable ground until it is disposed of / collected.				
	32.	Prevent littering by staff at the affected areas by providing bins or waste bags in sufficient locations.				
	33.	Dispose of waste at suitably licensed waste disposal facilities.				
	34.	Do not allow any burning or burying of waste.				
Contaminated water / run-off management	35.	Prevent discharge of any pollutants, such as cement, concrete, lime, chemicals, and other contaminated waste water and fuels into any water sources and/or the environment.	<ul style="list-style-type: none"> • MSR 	<ul style="list-style-type: none"> • Throughout operations 	<ul style="list-style-type: none"> • Visual inspection 	<ul style="list-style-type: none"> • Implementation of preventative actions • Visibility of contamination
	36.	Ensure all stockpile areas are lined.				
	37.	Inspect vehicles and equipment for oil/fuel leaks frequently in the affected area.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	38.	Regularly inspect the integrity of the new process water dam (including liner). Fix leaks immediately.				
Stormwater management	39.	Collect stormwater and runoff water from the affected areas in subsurface sumps and drains.	• MSR	• Throughout operations	• Visual inspection	<ul style="list-style-type: none"> • Incidence of stormwater contamination • Visible leaks/ water wastage • Visible surface erosion
	40.	Implement stormwater control measures in the affected areas.				
Air quality management	41.	Implement dust suppression measures on roads and cleared areas.	• MSR	• Throughout operations	<ul style="list-style-type: none"> • Visual assessment of dust plumes • Visual assessment of dust control measures 	<ul style="list-style-type: none"> • Visibility of dust plumes • Dust mitigation measures in place • Number of days that dust plumes are visible • Number of registered complaints • Size of disturbed areas
	42.	Limit vehicle speeds to 35 km/h in the affected areas.				
	43.	Stabilise exposed surfaces as soon as is practically possible.				
	44.	Minimise dust generated off stockpiles: <ul style="list-style-type: none"> • Minimise the slope of the stockpile (maximum slope of 2:1); and • Limit stockpile heights to 8 m. 				
	45.	Monitor the No Go area weekly to identify any transgressions or contamination from, for example, material / dust emanating from the stockpiles.				
	46.	Limit the number of vehicles allowed in the affected areas and restrict the movement of these vehicles over unsurfaced or unvegetated areas.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	47.	Maintain all generators, vehicles, vessels and other equipment in good working order to minimise exhaust fumes.				
Transportation and refuelling	48.	Undertake regular maintenance of vehicles and machinery to identify and repair minor leaks and prevent equipment failures.	• MSR	<ul style="list-style-type: none"> • Throughout operations 	<ul style="list-style-type: none"> • Visual inspection of vehicles, machinery and refuelling/maintenance areas 	<ul style="list-style-type: none"> • Number of incidents of non-compliance • Number of leaks and spills • Cost of cleaning up spills
	49.	Inspect vehicles and equipment for oil/fuel leaks frequently.				
	50.	Undertake any on-site refuelling and maintenance of vehicles/machinery in designated areas.				
	51.	Use appropriately sized drip trays for all refuelling, repairs done on vehicles / machinery or when vehicles are parked – ensure these are strategically placed to capture any spillage of fuel, oil, etc.				
	52.	Clean up any spills immediately, through containment and removal of free product and appropriate disposal of contaminated soils.				
	53.	Keep spill containment and clean-up equipment at all work sites and for all polluting materials used at the Mine.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
Protection of archaeological and paleontological resources	54.	Inform employees and contractors that archaeological or paleontological artefacts might be exposed and that the Archaeological Management Plan must be followed.	• MSR	• Throughout operations	• Visual inspection	<ul style="list-style-type: none"> Records of heritage finds Incidences of loss/damage to heritage resources
	55.	Empower staff to stop works on (chance) discovery of heritage resources.				
	56.	On discovery of archaeological / palaeontological finds, fence off the area with a 5 m buffer zone. Send information and photographs to a specialist for assessment and to determine preservation, collection and record keeping procedures.				
Visual aspects	57.	Stabilise the slopes of the new process water dam.	• MSR	• Throughout operations	• Visual inspection	• Number of complaints
	58.	Avoid excavation, handling and transport of materials which may generate dust under high wind conditions.				
	59.	Ensure speed limits are respected at all times.				
	60.	Keep the affected areas tidy and all activities, material and machinery contained within an area that is as small as possible.				
	61.	Rehabilitate disturbed areas incrementally and as soon as possible.				

Operational Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	62.	Minimise the use of night-lighting. No high mast lighting or up-lighting allowed in the affected areas.				
Response to environmental pollution	63.	In the event of environmental pollution, e.g. through spillages, immediately stop the activity causing the problem.	• MSR	• Throughout operations	<ul style="list-style-type: none"> Maintain register of pollution events and response Following resumption of activities, frequently inspect repaired equipment to ensure proper functioning 	<ul style="list-style-type: none"> Number of incidents Time activities stopped Number of recurring incidents Availability and completeness of register
	64.	Only resume activity once the problem has been stopped.				
	65.	Repair faulty equipment as soon as possible.				
	66.	Install additional bunding / containment structures around the equipment that was the source of the leak / spillage.				
	67.	Treat hydrocarbon spills, e.g. during refuelling, with adequate absorbent material, which then needs to be disposed of at a suitable landfill.				

3. Measures Applicable to the Closure Phase

The objective of this section is to provide recommendations for the decommissioning, closure and rehabilitation of the affected areas at the end of the operational lifespan of Tormin Mine, to achieve sustainable land use conditions and avoid or minimise costs and long term liabilities to MSR.

The measures listed in Table 3-1 are based on the assumption that the plant (and process dam) and associated infrastructure will be removed at the end of operations.

Table 3-1: Environmental management and mitigation measures that must be implemented during the *Closure Phase*

Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
Closure objectives	1.	Prepare a detailed Closure Plan for Tormin Mine laying out the requirements to: <ul style="list-style-type: none"> • Remove all infrastructure from the affected areas; • Rip the disturbed footprints; • Redistribute topsoil and reseed the affected areas; and • Cap and reseed the new process water dam or, if a future use of the dam has been identified, remove all sediment from the dam and assess the integrity of the liner. 	• MSR	• Approximately 1 year before planned closure	• Review of progress by MSR Management	• Approved Closure Plan
	2.	Identify and assess any potential environmental and societal risks associated with the preferred method of closure.				
	3.	Address potentially significant environmental and societal risks by amending the proposed method of closure to prevent any significant adverse impacts.				
Financial provision	4.	Undertake a review of the requirements for closure and ensure the adequacy of the financial provision is assessed to include the affected areas.	• MSR	• Immediately	• Review of progress by MSR Management	• Updated financial provision
General	5.	Provide adjacent landowners with contact details to register any observations and complaints following closure.	• MSR as determined in detailed Closure Plan	• Before the end of closure	• Notifications sent	• -
	6.	Notify relevant authorities and key stakeholders when decommissioning and rehabilitation are completed.	• MSR	• After closure	• Review notifications sent	• Closure certificate issued

Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
Environmental awareness training	7.	<p>Provide environmental awareness training to all personnel on site at the start of their employment and frequently throughout their employment. Training should include discussion of:</p> <ul style="list-style-type: none"> • Potential impact of waste and activities on the environment; • Suitable disposal of waste and litter; • Response to environmental pollution; • Key measures in the EMPr relevant to worker's activities; and • How incidents and suggestions for improvement can be reported. <p>Ensure that all attendees remain for the duration of the training and on completion sign an attendance register that clearly indicates participants' names.</p>	• MSR	<ul style="list-style-type: none"> • Before workers start working on-site • Throughout closure 	<ul style="list-style-type: none"> • Check training attendance register • Observe whether activities are executed in line with EMPr requirements 	<ul style="list-style-type: none"> • Proportion of workers that completed environmental training • Compliance of workers with EMPr
Vegetation management	8.	Rehabilitate the affected areas as required in terms of the intended future land use and the Closure Plan.	• MSR	<ul style="list-style-type: none"> • During closure 	<ul style="list-style-type: none"> • Visual inspection of rehabilitation areas 	<ul style="list-style-type: none"> • Success of rehabilitation
	9.	Monitor the success of rehabilitation in terms of the Closure Plan.				
	10.	Ensure that no vegetation is removed or disturbed outside the delineated boundary.				
	11.	Conduct regular alien clearing for 3 years after closure using the best-practice methods for the species concerned. Avoid using herbicides as far as possible.				

Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
Hazardous materials	12.	Ensure hazardous materials (especially fuel) are stored in suitable hazardous material storage facilities constructed from impermeable materials. The storage facilities must have bund containment capacity equal to 110% of the largest container.	• MSR	• Throughout closure	• Visual inspection of hazardous materials handling and storage areas	<ul style="list-style-type: none"> Number of incidents of non-compliance with safety procedures concerning hazardous materials, including waste materials Number of spills of hazardous materials, including waste materials Cost of cleaning up spills Evidence of contamination and leaks
	13.	Ensure that contaminants are not placed or handled directly on the ground.				
	14.	Keep spill containment and clean-up equipment at all work sites and for all polluting materials used at the Mine.				
	15.	Clean up any spills immediately through containment and removal of free product and appropriate disposal of contaminated soils.				
Waste management	16.	Waste minimisation principles and suitable waste handling and disposal protocols must be implemented.	• MSR	• Throughout closure	• Visual inspection of waste disposal areas	<ul style="list-style-type: none"> Presence of litter Availability of rubbish bins and skips Degree to which rubbish bins and skips are filled Total volume of general and hazardous waste storage capacity Total volume of general and
	17.	Collect all waste in marked bins and/or skips.				
	18.	Collect recyclables and scrap metal waste separately and deliver these to suitable facilities or arrange for collection.				
	19.	Provide separate bins for hazardous / polluting materials (hydrocarbons, chemicals, batteries) and mark these clearly. Store hazardous / polluting materials on impermeable ground until it is disposed of / collected.				

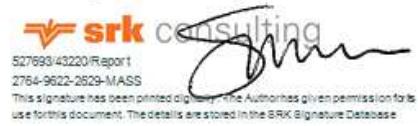
Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	20.	Prevent littering by staff at the affected areas by providing bins or waste bags in sufficient locations.				hazardous waste stored on site <ul style="list-style-type: none"> • Degree to which different waste is separated • Frequency of waste collection
	21.	Dispose of waste (including sediment from the new process water dam) at suitably licensed waste disposal facilities.				
	22.	Do not allow any burning or burying of waste.				
Contaminated water / run-off management	23.	Prevent discharge of any pollutants, such as cements, concrete, lime, chemicals, and other contaminated waste water and fuels into any water sources and/or the environment.	• MSR	• Throughout closure	• Visual inspection	<ul style="list-style-type: none"> • Implementation of preventative actions • Visibility of contamination • Visible surface erosion
	24.	Inspect vehicles and equipment for oil/fuel leaks frequently in the affected area.				
	25.	Retain (and monitor) stormwater and erosion measures in the affected areas until such time that the area is no longer prone to erosion.				
Air quality management	26.	Implement dust suppression measures on roads and cleared areas.	• MSR	• Throughout closure	<ul style="list-style-type: none"> • Visual assessment of dust plumes • Visual assessment of dust control measures 	<ul style="list-style-type: none"> • Visibility of dust plumes • Dust mitigation measures in place • Number of days that dust plumes are visible • Number of registered complaints • Size of disturbed areas
	27.	Ensure speed limits are respected at all times.				
	28.	Stabilise exposed surfaces as soon as is practically possible.				
	29.	Limit the number of vehicles allowed in the affected areas and restrict the movement of these vehicles over unsurfaced or unvegetated areas.				

Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	30.	Maintain all generators, vehicles, vessels and other equipment in good working order to minimise exhaust fumes.				
Transportation and refuelling	31.	Undertake regular maintenance of vehicles and machinery to identify and repair minor leaks and prevent equipment failures.	• MSR	• Throughout closure	• Visual inspection of vehicles, machinery and refuelling/maintenance areas	<ul style="list-style-type: none"> Number of incidents of non-compliance Number of leaks and spills Cost of cleaning up spills
	32.	Inspect vehicles and equipment for oil/fuel leaks frequently.				
	33.	Undertake any on-site refuelling and maintenance of vehicles/machinery in designated areas.				
	34.	Use appropriately sized drip trays for all refuelling, repairs done on vehicles / machinery or when vehicles are parked – ensure these are strategically placed to capture any spillage of fuel, oil, etc.				
	35.	Clean up any spills immediately, through containment and removal of free product and appropriate disposal of contaminated soils.				
	36.	Keep spill containment and clean-up equipment at all work sites and for all polluting materials used at the Mine.				
Response to environmental pollution	37.	In the event of environmental pollution, e.g. through spillages, immediately stop the activity causing the problem.	• MSR	• Throughout closure	<ul style="list-style-type: none"> Maintain register of pollution events and response Following resumption of 	<ul style="list-style-type: none"> Number of incidents Time activities stopped Number of recurring incidents
	38.	Only resume activity once the problem has been stopped.				

Closure Phase Measures						
Aspect	ID	Mitigation measure / Procedure	Responsible	Implementation Timeframe	Monitoring Methods	Performance Indicators
	39.	Repair faulty equipment as soon as possible.			activities, frequently inspect repaired equipment to ensure proper functioning	<ul style="list-style-type: none"> • Availability and completeness of register
	40.	Treat hydrocarbon spills, e.g. during refuelling, with adequate absorbent material, which then needs to be disposed of at a suitable landfill.				

Prepared by

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Scott Masson

Senior Environmental Consultant

Project Partner

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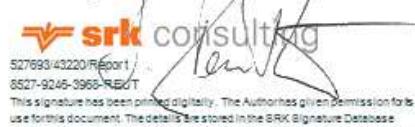
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Chris Dalgliesh

Principal Environmental Consultant

Project Manager

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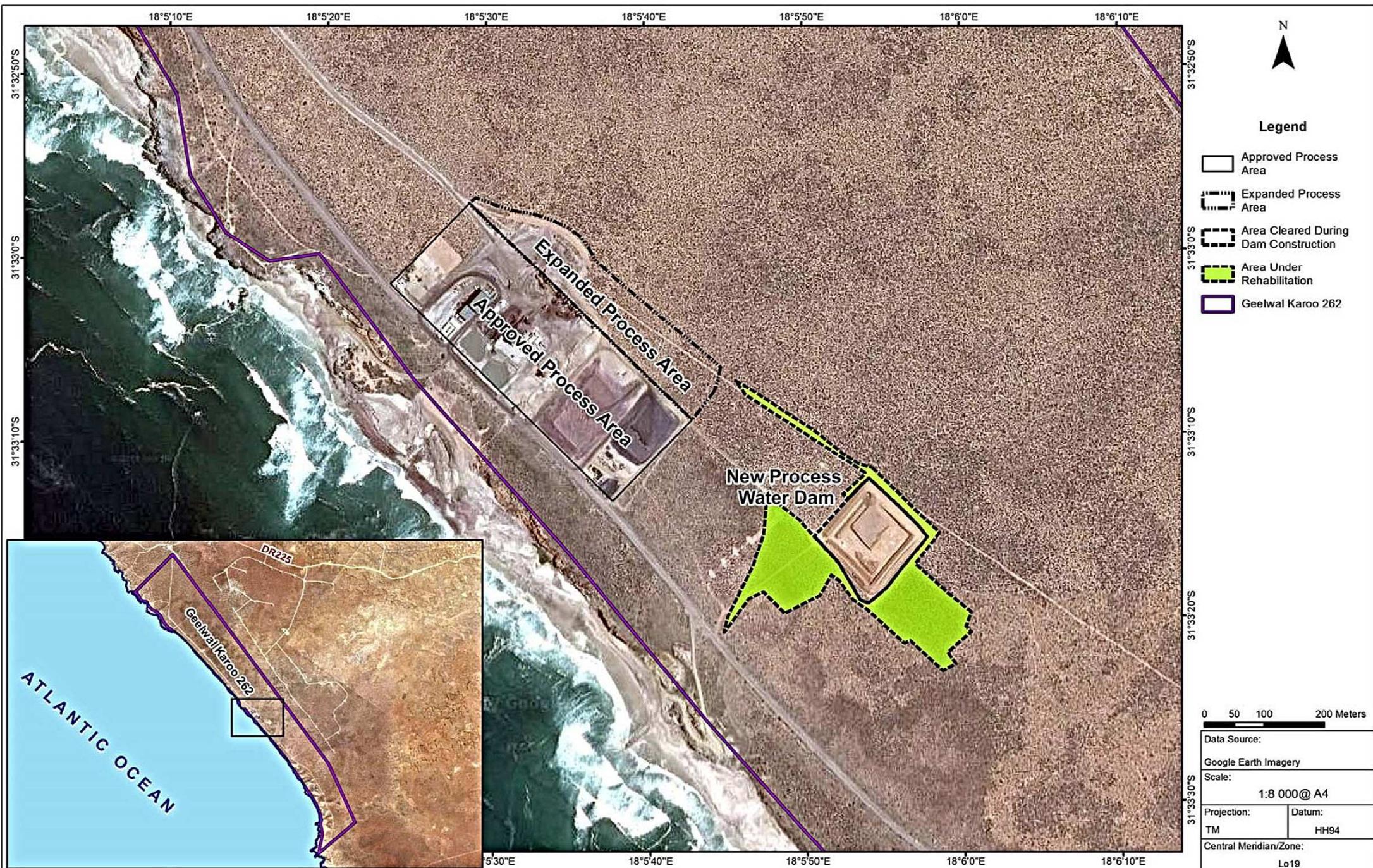
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Sue Reuther

Principal Environmental Consultant

Appendix A:

Locality Plan



SRK Report Distribution Record

Report No.

527693/3

Copy No.

Name/Title	Company	Copy	Date	Authorised by
	This report is being distributed as an annexure to the s24G application document, and as such to the same stakeholders as that report.			

Approval Signature:

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4 May 2018
527693
DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

CapeNature
Jonkershoek Road
Stellenbosch
7600

Attention: Ms. Alana Duffell-Canham

Dear Ms. Duffell-Canham

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

Mineral Sand Resources (Pty) Ltd (MSR) owns and operates the Tormin Mineral Sands Mine (Tormin Mine) on the West Coast of South Africa, near Lutzville. The mine holds two Mining Rights (MR162 and MR163) and an approved Environmental Management Programme (EMPr) to mine Valuable Heavy Minerals (VHM).

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A handwritten signature in black ink, appearing to read 'Alana Duffell-Canham'.

Partners R Armstrong, AH Bracken, N Brien, JM Brown, CD Dalgleish, BM Engelsman, R Gardiner, M Hirsch, W Jordaan, WC Joughin, DA Kilian, S Kisten, JA Lake, V Maharaj, DJ Mahlangu, I Mahomed, HAC Meintjes, MJ Morris, GP Net, VS Reddy, PJ Shepherd, MJ Sim, VM Simposya, HFJ Theart, KM Uderstadt, AT van Zyl, MD Wanless, ML Wertz, A Wood

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Consultants JR Dixon, *PrEng*; GC Howell, *PrEng*; T Hart, *MA*, *TTHD*; PR Labrum, *PrEng*; RRW McNeill, *PrTech Eng*; PN Rosewarne, *PrSci Nat*, *MSc*; AA Smithen, *PrEng*; TR Stacey, *PrEng*, *DSc*; OKH Steffen, *PrEng*, *PhD*; PJ Terbrugge, *PrSci Nat*, *MSc*; DJ Venter, *PrTech Eng*

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Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

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Principal Environmental Consultant



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4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Department of Environmental Affairs and Development Planning

Directorate: Development Facilitation

Utilitas Building

1 Dorp Street

Cape Town

8000

Attention: Adri La Meyer

Dear Adri

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

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4 May 2018
527693
DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Department of Environmental Affairs: Oceans and Coasts
East Pier Shed
2 East Pier Rd
V & A Waterfront
Cape Town
8000

Attention: Tintswalo Shirinda

Dear Ms Shirinda

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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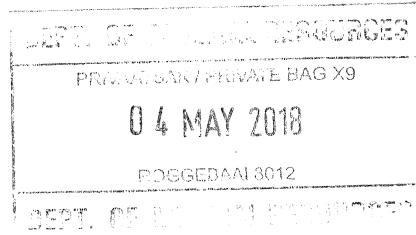
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Sue Reuther
Principal Environmental Consultant



4 May 2018
 527693
 DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Atterbury House
 9th Floor
 c/o Lower Burg and Riebeeck Street
 Cape Town
 8012

Attention: Regional Manager – Ms Duduzile Kunene

Dear Ms Kunene

Proposed Extension of Tormin Mine, West Coast, South Africa: Release of Scoping Report for Public Review

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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The s24G documentation will be released to the public and to the authorities listed in the table below from **5 May to 4 June 2018**.

Table 1: Details of commenting authorities

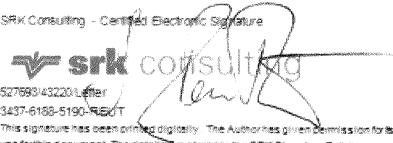
NAME	CAPACITY	ORGANISATION
Adri La Meyer	Development Facilitation	Department of Environmental Affairs and Development Planning
Tintswalo Shirinda		Department of Environmental Affairs: Oceans and Coasts
Mashudu Murovhi	Catchment Manager	Department of Water and Sanitation
Andrew September	Case Officer	Heritage Western Cape
Basson Geldenhuys	Chief Planner	Department of Public Works
Malcolm Watters	Chief Director: Road Network Management	Western Cape Department of Transport and Public Works
Alana Duffell-Canham		CapeNature
Cor van der Walt		Western Cape Department of Agriculture
H Prins	Municipal Manager	West Coast District Municipality
Danie Lubbe	Municipal Manager	Matzikama Local Municipality

A hardcopy and/or electronic copy, and request for comment letter have been sent to the authorities listed above.

For further information, please contact Sue Reuther at SRK: Tel: (021) 659 3060, Fax: (086) 530 7003, or Email: sreuther@srk.co.za. We look forward to your input and response to the document.

Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

SRK Consulting - Certified Electronic Signature

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Sue Reuther
 Principal Environmental Consultant



4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Department of Public Works
 Room 1419
 Customs House
 Lower Heerengracht Street
 Cape Town
 8001

Attention: Mr Basson Geldenhuys

Dear Mr Geldenhuys

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

Mineral Sand Resources (Pty) Ltd (MSR) owns and operates the Tormin Mineral Sands Mine (Tormin Mine) on the West Coast of South Africa, near Lutzville. The mine holds two Mining Rights (MR162 and MR163) and an approved Environmental Management Programme (EMPr) to mine Valuable Heavy Minerals (VHM).

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Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

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Sue Reuther
Principal Environmental Consultant

NAME : Bolelqini

DATE : 4 -5 - 2018 .

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www.srk.co.za



4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Department of Water and Sanitation
52 Voortrekker Street
Bellville
7532

Attention: Mr Mashudu Murovhi

Dear Mr Murovhi

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

Mineral Sand Resources (Pty) Ltd (MSR) owns and operates the Tormin Mineral Sands Mine (Tormin Mine) on the West Coast of South Africa, near Lutzville. The mine holds two Mining Rights (MR162 and MR163) and an approved Environmental Management Programme (EMPr) to mine Valuable Heavy Minerals (VHM).

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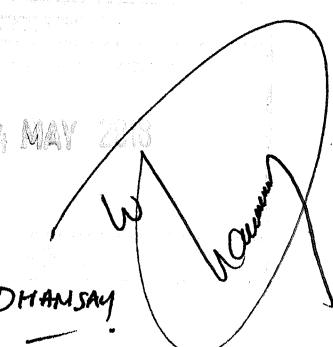
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Sue Reuther
Principal Environmental Consultant

04 MAY 2018
 W. D. MANSAY




4 May 2018
 527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Heritage Western Cape
 Protea Assurance Building
 Greenmarket Square
 Cape Town
 8001

Attention: Andrew September

Dear Andrew

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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Sue Reuther
Principal Environmental Consultant



4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Western Cape Department of Agriculture
 Elsenburg
 Muldersvlei Road
 7607

Attention: Mr Cor van der Walt

Dear Mr van der Walt

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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Sue Reuther
Principal Environmental Consultant





4 May 2018
 527693
 DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

87
 4-5-2018

Western Cape Department of Transport and Public Works
 9 Dorp Street
 Cape Town
 8001

Attention: Mr Malcolm Watters

Dear Mr Watters

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

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Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

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4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Lutzville Public Library
7 Du Toit Street
Lutzville
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Attention: The Librarian

Dear Madam/Sir

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

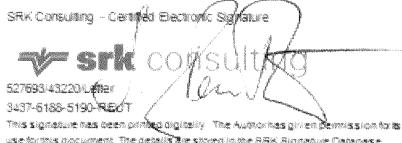
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Sue Reuther

Principal Environmental Consultant

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4 May 2018

527693

DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

Matzikama Local Municipality
 37 Church Street
 Vredendal
 8160

Attention: Mr Danie Lubbe

Dear Mr Lubbe

NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa

Mineral Sand Resources (Pty) Ltd (MSR) owns and operates the Tormin Mineral Sands Mine (Tormin Mine) on the West Coast of South Africa, near Lutzville. The mine holds two Mining Rights (MR162 and MR163) and an approved Environmental Management Programme (EMPr) to mine Valuable Heavy Minerals (VHM).

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Sue Reuther
Principal Environmental Consultant



4 May 2018
 527693
 DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

West Coast District Municipality
 58 Long Street
 Moorreesburg
 7310

Attention: Municipal Manager – Mr HF Prins

Dear Mr Prins

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4 May 2018

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DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163)

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Attention: The Librarian

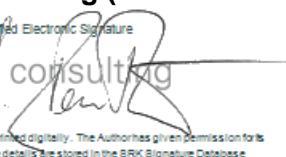
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Jessica Du Toit

From: Jessica Du Toit
Sent: 04 May 2018 02:59 PM
To: Scott Masson
Subject: 527693: Tormin s24G process - Availability of documentation for public comment

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'Merle.Sowman@uct.ac.za'	

Dear Stakeholder

Stakeholder Comment Period: NEMA Section 24G Application to Rectify Unlawful Activities: Expansion of Processing Area and New Process Water Dam at the Tormin Mine, West Coast, South Africa (DMR Reference Number: WC 30/5/1/2/3/2/1 (162 and 163))

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Regards,

Jessica du Toit BSc (ConsEcol), MPhil (Env Mgmt)

Environmental Consultant



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Email: jedutoit@srk.co.za; **Skype for Business:** duje@srk.co.za

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