ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR THE PROPOSED SAND AND GRAVEL MINING IN THE SCHAAF RIVER, KHOMAS REGION

BACKGROUND INFORMATION DOCUMENT



Prepared by:



Prepared for:

Hermann Gerhard Romeis and Hagen Romeis

August 2023

1 INTRODUCTION

Hermann Gerhard Romeis (Farm Owner) and Hagen Romeis (the Proponent) plans to conduct sand and gravel mining activities along the Skaap (Schaaf) River on the Farm Neu Brack 454 in the Khomas Region (Figure 1). Operations will comprise the excavation of sand and gravel; loading onto tipper trucks by means of front-end loaders and transportation to markets. The Proponent requested Geo Pollution Technologies (Pty) Ltd (GPT) to apply for an environmental clearance certificate (ECC) for the proposed sand mining activities. The ECC is required as per the Environmental Management Act No. 7 of 2007 (EMA). In support of the ECC application, an environmental scoping impact assessment (EIA) and environmental management plan (EMP) will be submitted to the Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs (DEA).

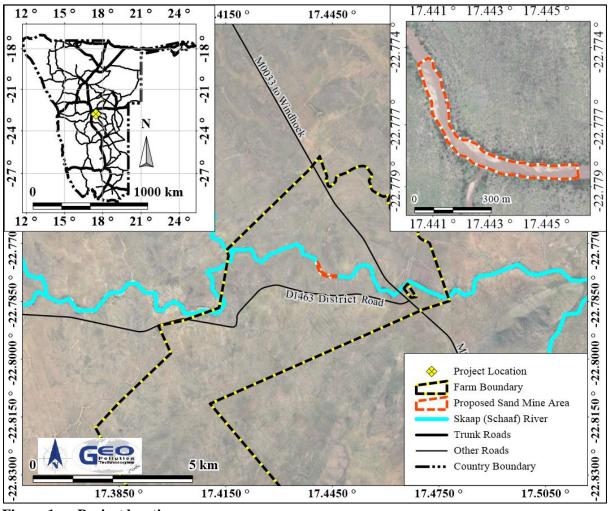


Figure 1 Project location

2 PURPOSE OF THE BID

With this background information document (BID), GPT aims to provide information to, and interact with, interested and affected parties (IAPs) regarding the project and the environmental assessment process. IAPs are therefore invited to register with GPT to:

- Provide information which should be taken into account in the assessment of impacts.
- Share any comments, issues or concerns related to the project.
- Review and comment on the EIA and EMP.

3 PROJECT DESCRIPTION

Activities considered for the environmental assessment have been divided into the following phases: planning, operational and decommissioning phases. A brief outline of expected activities for each phase is detailed below.

3.1 PLANNING PHASE

While planning for operations and future decommissioning of the proposed sand mining project, it is the responsibility of the Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to and during all phases, to ensure potential impacts and risk are minimised. Typical planning activities include:

- Obtain permits and approvals from local and national authorities (e.g. ECC).
- Ensure compliance to land use rights and aspects such as regional council and traditional authority consent.
- Appoint a health, safety and environmental coordinator to implement the EMP.
- Provide for a fund to cater for environmental incidents such as pollution clean-up and ecological restoration/rehabilitation.
- Ensure all appointed contractors and employees enters into an agreement which includes the EMP.
- Establish and/or maintain a reporting system to report on aspects of operations and decommissioning as outlined in the EMP.

3.2 OPERATIONAL PHASE

Systematic strip mining will be conducted along the Schaaf River by means of a front-end loader. The sand will be transported with a tipper truck to stockpile areas from where it will be collected by clients. The Proponent will implement various measures to ensure environmental protection. Some strategies include restricting the number and placement of stockpile areas, limiting the mining depth to ensure groundwater is protected, maintaining buffers around trees, and where applicable stockpiling of overburden for future rehabilitation.

3.3 DECOMMISSIONING PHASE

Decommissioning entails the cessation of sand mining in the area and removal of all related infrastructure, unless otherwise required for post closure use. When the sand mining project is decommissioned, the stockpiles and any disturbed areas must be rehabilitated. Rehabilitation of the mined-out areas will be an ongoing process throughout the life of the mine. Mined-out area rehabilitation will see the sloping of all unused mounds and river banks. Where indigenous trees are accidentally damaged, new trees should be established to protect the integrity of the riverine vegetation. Thus, by the time the operations are decommissioned as a whole, most of the rehabilitation will already have been completed. Rehabilitation will also entail sloping of the mined areas to, among others, prevent pooling or damming of water when the river flows, remove safety risks, and reduce the visual impacts of mining. Stockpile areas and roads that will no longer serve any purpose may require ripping of compacted soil and returning of overburden to allow for more rapid revegetation.

3.4 PRELIMINARY IDENTIFIED IMPACTS

During the preparation of the environmental assessment, all components of the environment will be considered. However, only those components which are, or may be, significantly impacted, or are deemed to be sensitive, will be assessed. These may include, but is not limited to, the following:

- Health and safety of workers, visitors and members of the community (falling into sand pits, drowning in exposed or pooled water, vehicle accidents, dust, noise, etc.)
- Socio economic (revenue generation, social ills, resource availability, etc.)
- Groundwater, surface water and soil (hydrocarbon spills, effluent generation and disposal, waste, exposure of groundwater, etc.)

• Ecosystem and biodiversity (habitat destruction, damaging trees, disturbing nesting birds, pollution, fire, etc.)

4 PUBLIC CONSULTATION

GPT invites all IAPs to provide in writing, any issues and suggestions regarding the project. This correspondence must include:

- Name and surname
- Organization represented or private interest
- Position in the organization
- Contact details
- Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application.

All contributions become public knowledge and will be circulated along with the reports as per the EMA requirements. The comments, inputs and suggestions will also be submitted to the DEA along with how any issues have been addressed in the EIA. The public participation process will remain ongoing during the environmental assessment. However, all comments and concerns should be provided to GPT to ensure incorporation into the final report.

For any additional information the project team may be contacted at:



Your Rights as an IAP according to the Environmental Management Act, No7 of 2007, Government Notice No 30 (Environmental Impact Assessment Regulations)

Section 23.

- (1) A registered interested or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application, and to bring to the attention of the Environmental Commissioner any issues which that party, believes may be of significance to the consideration of the application, as long as -
 - (a) comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report;
 - (b) the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.
- (2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report.
- (3) Reports referred to in sub regulation (2) include
 - (a) scoping reports;
 - (b) scoping reports amended and resubmitted;
 - (c) assessment reports; and
 - (d) assessment reports amended and resubmitted.
- (4) Any written comments received by the applicant from a registered interested or affected party must accompany the report when the report is submitted to the Environmental Commissioner.
- (5) A registered interested or affected party may comment on any final report that is submitted by a specialist reviewer for the purposes of these regulations where the report contains substantive information which has not previously been made available to a registered interested or affected party.

Section 24:

The applicant responsible for an application must ensure that the comments of interested and affected parties are recorded in reports submitted to the Environmental Commissioner in terms of these regulations, and comments by interested and affected parties on a report which is to be submitted to the Environmental Commissioner may be attached to the report without recording those comments in the report itself.