APP - 001190

SUPER SAND MINING OPERATIONS IN THE FISH RIVER, KEETMANSHOOP

ENVIRONMENTAL MONITORING SUMMARY REPORT DECEMBER 2016 TO NOVEMBER 2019



Compiled by:



Compiled for:



December 2019

Project:	SUPER SAND MINING OPERA	ATIONS IN THE FISH RIVER,		
0	KEETMANSHOOP: ENVIRONME	NTAL MONITORING SUMMARY		
	REPORT DECEMBER 2016 TO NO	DVEMBER 2019		
Report:	Final			
Version/Date:	December 2019			
Prepared for:	Kachas Industrial T/A Super Sand			
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_	Windhoek			
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	December 2016 to November 2019.			
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		n of Geo Pollution Technologies (Pty)		
	Ltd.			
Report				
Approval				
	January and a			
	1 Ar			
	Pierre Botha			
	Managing Director			

I \underline{CJ} \underline{Merwl} acting as the Super Sand representative, hereby confirm that the information contained in this report is a true reflection of the information which the proponent has provided to Geo Pollution Technologies. All material information in the possession of the proponent that reasonably has, or may have the potential of influencing any decision or the objectivity of this report, is fairly represented in this report.

on the <u>28t</u> day of Fe larienta mary_2020. Signed at IM. Super-Sand

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1 INTRODUCTION

Kachas Industrial T/A Super Sand obtained an environmental clearance certificate on 30 November 2016 for existing operations which entails the removal of sand from the Fish River close to Seeheim, Karas Region. Normal operations associated with the sand mine continued throughout the period of validity of the environmental clearance certificate which is attached in Appendix A. Operations mainly involve removal of sand deposits from the Fish River. This is done by means of earth moving equipment which load sand onto trucks where after the material is transported to a brickfield in Keetmanshoop.

Geo Pollution Technologies was appointed by Super Sand to present their monitoring results and apply for a renewal of the environmental clearance certificate. This report provides a summary of all monitoring results for the period December 2016 to November 2019. All the information presented herein was provided by Super Sand according to their records.

2 OPERATIONAL PHASE

The following operational phase monitoring is based on the requirements of the EMP which was approved by the Ministry of Environment and Tourism.

2.1 EMP Implementation

This report in itself is a fulfilment of the requirement to document monitoring results. The report aims at providing a summary of actions taken during the time of operations linked to the validity of the initial environmental clearance certificate.

2.2 Financial Provision

Financial planning has enabled continued operations and related rehabilitation initiatives. There were no incidents which required additional resources for remediation. No significant rehabilitation actions will be required once operations are completed.

2.3 Recruitment

All staff employed are Namibian, a portion of which is women. All provisions of the Labour Act are met.

2.4 Stakeholder Communication

During the initial environmental assessment, consultation with various stakeholders were conducted and information about operations provided. No further consultation was required and no concerns or comments were received by either Super Sand or the environmental consultant. Any person is welcome to contact Super Sand management directly regarding any complaint.

An access agreement with the local land owner was made and attached in Appendix B. All equipment on site is branded with the company logo.

2.5 Health and Safety

Super Sand has adopted an Occupational Health and Safety Policy which sets out objectives with regards to safety aspects, as well as provide a code of conduct for all employees while detailing general safety rules. This policy is attached in Appendix C.

All personnel are provided with adequate personal protective equipment. A record of provided material is kept at the human resources department. A record of PPE provision is attached in Appendix D. Random alcohol and drug tests may be conducted at any time to ensure that no employees work while under the influence of any substance. All vehicles are roadworthy and have been registered with the relevant authorities. All drivers have appropriate driver's licenses. Vehicles are regularly maintained and all loads transported on public roads are covered. No incidents in terms of health and safety have occurred.

2.6 Waste Management

All vehicles and machines are washed and serviced on impermeable surfaces equipped with an oil / water separator. Photo 1 depicts this area. Vehicles on site are equipped with drip trays. Maintenance records of all vehicles and machines are kept to ensure optimal running condition of equipment. Any hazardous waste is kept on site until collected by a waste management company. Photo 2 depicts some of the waste storage. The site is kept neat and tidy at all times and no waste has ever been burned or buried on site by Super Sand. All waste is contained within the waste management area and removed on a regular bases. A disposal certificate is attached in Appendix A. All domestic waste is discarded at the Keetmanshoop Municipal waste facility. No waste related complaints have been received.



Photo 1. Wash Bay Facility



Photo 2. Waste Management Facility

2.7 **Dust and Noise**

No dust or noise related complaints were received. Dust suppression is continually conducted on the gravel access road as required. Work hours are kept within the EMP requirements and no work is conducted after dark. Photo 3 depicts normal operations with typical dust.

2.8 **Environmental Training and Awareness**

All labourers on site have been made aware of the EMP and certain requirements which have bearing on the environment and operations. Staff have been made aware of trees which should not be damaged as well as general requirements in terms of waste, health, security and safety.





2.9 **Environmental Conservation**



No protected trees have been removed. No un-authorised movement of staff have been allowed and no incidences of poaching have been recorded or reported.

All access roads have been kept within normal operating standards and no additional roads and tracks were created. No sand mining has been, or is conducted outside of demarcated and approved areas. All waste is continually removed from site as not to attract vermin and/or cause pollution to ecosystems.

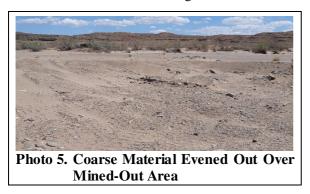
2.10 Social and Cultural Heritage

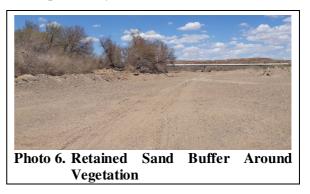
No sites of archaeological or heritage importance have been found during operations.

3 REHABILITATION

The nature of operations are such that continual rehabilitation is conducted while operations are ongoing. Therefor no additional financial provision has been allocated. Super Sand has however made provision for severance packages for employees in the event of a sudden unexpected closure of operations.

Mining is conducted in a systematic manner and all uneven piles of unused material is evened out over the riverbed. Photo 5 and Photo 6 depicts the levelled areas where rehabilitation was conducted. A sand buffer was retained around vegetation as to ensure reduced probability of erosion.





4 DECOMMISIONING PHASE

No decommissioning activities were performed for the reporting period.

5 CONCLUSION

For the duration of the validity of the environmental clearance certificate, normal operations associated with sand mining continued. No complaints were received from neighbours or community members during the reporting period. Operational activities will proceed as normal and additional measures considered for improvement of environmental monitoring and protection.

Appendix A: Permits and Certificated

Ai – Environmental Clearance Certificate

Aii – Disposal Certificate

Ai – Environmental Clearance Certificate



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26461) 284 2111 Fax: (00 26461) 229 936

E-mail: josafat.hiwana@met.gov.na Enquiries: Mr. Josafat K Hiwana

Cnr Robert Mugabe & Dr Kenneth Kaunda Street Private Bag 13306 Windhoek Namibia

28 November 2016

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Director Kachas Industrial T/A Super Sand P.O. Box 11073 Windhoek

Dear Sir/Madam

SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR SAND MINING OPERATIONS IN THE FISH RIVER, KARAS REGION

The Environmental Impact Assessment and Environmental Management Plan submitted are sufficient as it made provisions of the environmental management concerning the proposed activities. From this perspective, regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project. From, this prospective, I issue this environmental clearance certificate with the following conditions attached as appendix A.

On the basis of the above, this letter serves as an environmental clearance certificate for sand mining project in the Fish River. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for any misleading information, nor any adverse effects that may arise from this project's activities. Instead, full accountability rests with Kachas Industrial T/A Super Sand and their Consultants.

This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.

Yours sincerely,

Teofilus Nghitila ENVIRONMENTAL COMMISSIONER ental Com

"Stop the poaching of our rhinos"

Super Sand Keetmanshoop - Monitoring Report - December 2019 Geo Pollution Technologies (Pty) Ltd

P/Bag 13306 Windhoek, Namibia

2016 -11- 3 0

<u> Aii – Disposal Certificate</u>

	2	Dispo	osal Cer	tific	ate	1 1 571	Page 8 of 23.
WASTE OIL RECYCLERS		64 (0) 81 7	: 90398, Klein 773 9187 / +2 llections@oilf	64 (0)) 81 141	1 5060	
Company Name: Tel: (09 Address:	9264) 063-240425/ Fax: 063-242504 D. Box 265, Marier	242475	б. 		Date:	1483426	20_
	NAMIBIA				Tel: 0 p	1482400	
Type of Waste: O)il 📎	Quantity	1 900	ltr			
Fi	ilters	Quantity		appro	ХС		
0	ther	Quantity	8. 87				
Name: Louw Berg	h		N\$		eft		
Signature Customer.	<u>A</u> S		Notional VAT		427,	50	
Signature OIL TECH	AMM	/	きん Total N\$	0	7850	,00	_

All oil recycled/reprocessed. Hazardous waste that is derived and removed from the oil during processing is disposed of within the law and at the government allocated class one hazardous waste disposal sites. Certification is available on request. Oil Filters are crushed or drained of their residual oil and sent for scrap

Appendix B: Access Agreement

RE: Ooreenkomste

MEMORANDUM VAN OOREENKOMS

AANGEGAAN DEUR EN TUSSEN:-

HEARTLAND BK

Hierin verteenwoordig deur

PIETER JOHANNES VAN DER WALT ID NO 4605185017086

(hierinlater na verwys as "die Eienaar")

EN

Kachas Industrial Trust T/A Supersand

Hierin verteenwoordig deur

d zd anobus

(hierinlater na verwys as "die Kontrakteur"

1. TOEGANGSPAD

- Die Kontrakteur sal die reg hê om 'n toeganspad te bou vanaf B4 net wes van die 1.1 Seeheim brug tot in die Visrivier vir die doel om sand te laai.
- 1.2 Die kontrakteur sal verantwoordelik wees om die toegangspad self in stand te hou.

1.3 Die Kontrakteur sal die eienaar 7 dae na maandend vergoed vir die gebruik van die pad teen 'n prys van N\$5000/maand vir elke maand van die jaar sonder inagneming van die feit dat die pad nie gedurende die maand gebruik is nie.

2. SAND

> 2.1 Die kontrakteur sal die reg hê om 'n onbeberkte hoeveelheid sand te laai op die plaas Seeheim west nr 84 in die Keetmanshoop distrik. Die eienaar bevestig dat die bg plaas die wettige eiendom is van die eienaar.

- 2.2 Die kontrakteur bevestig hiermee dat hy 'n wettige lisensie van die ministerie verkry het om sand in die Visrivier te myn.
- 2.3 Die kontrakteur sal verantwoordelik wees om die hoeveelheid sand wat gelaai word maandeliks aan die eienaar deur te gee. Die eienaar sal geregtig wees om te enige tyd die ritlogboeke van die vragmotors wat sand laai te inspekteer en te kopieer.
- 2.4 Die kontrakteur sal verantwoordelik wees om die toegangspaaie in stand te hou en sal self die sand laai.
- 2.5 Die kontrakteur sal die eienaar 7 dae na maandend vergoed vir sand wat gelaai is in die betrokke maand teen 'n prys van N\$5/m3.

3. ALGEMEEN

Hierdie kontrak sal geldig wees vir 'n periode van drie jaar vanaf 1/06/2014 tot 31/05/2017 3.1 met 'n opsie om verder te herrnu.

30/05/2014 10:33

2 of 5

Super Sand Keetmanshoop - Monitoring Report - December 2019

RE: Ooreenkomste

3.2 Die vergoedings soos hierbo bepaal sal jaarliks met 10% eskaleer.

3.3 Die partye erken hiermee dat hierdie die hele ooreenkoms tussen hulle is en dat geen ander voorwaardes, stipulasies of voorstellings van watter aard ookal gemaak is deur enige van die partye of sy/haar/die se agente behalwe wat in hierdie kontrak genoem word en deur die partye hiertoe onderteken is nie.

3.4 Enige wysigings in die ooreenkoms sal slegs geldig wees indien dit op skrif gestel en deur albei partye onderteken is.

3.5 Alle kennisgewings tussen die partye sal skriftelik wees en gestuur word per pos of per epos na die onderstaande adresse:

Eienaar: Posbus 7362, Flamwood 2572, RSA. Eposadres pivdwalt@hotmail.com

Kontrakteur: Posbus 265, Mariental, Namibie. Eposadres kachas giway.na

3.6 Alle betalings aan die eienaar sal gemaak word in sodanige bankrekening as wat die eienaar van tyd tot tyd skriftelik sal aandui. Die rekening waarin die betalings gemaak sal word huidiglik tot verdere kennisgewing is :

ISABELLA VAN DER WALT TRUST Standard Bank Klerksdorp, Rekno 030612144 Takkode 052638

ALDUS GEDOEN en GETEKEN deur die KONTRAKTEUR te Marrente op 29 Mei 2014.

Kontrakteur

ALDUS GEDOEN on GETEKEN deur die EIENAAR te KLERKSDORP op 29 Mei 2014

Eienaar AS GETUIES

2 (vir eienaar)

(vir kontrakteur)

4 of 5

30/05/2014 10:33

Appendix C: Occupational Health and Safety Policy

OCCUPATIONAL HEALTH AND SAFETY POLICY

- 1. The Company believes that the responsible management of occupational health and safety concerns is an integral part of our business ethic.
- 2. By the effective management of occupational health and safety, commitment to our mission, vision and values, and by a culture of occupational health and safety awareness and responsibility, we strive to do the following:
 - a. To apply sound occupational health and safety management principles and operating practices.
 - b. Protect and promote the health and safety of all personnel, customers and the community.
 - c. Be alert to customer needs, technological advancements and socio-economic priorities.
 - d. Reduce and minimize the potential hazards in our business.
 - e. Reduce any detrimental impact our business might have on the society.

OUR POLICY IN THIS REGARD IS THEREFORE TO:

- a. To provide a safe and healthy working environment for the well-being of our employees and their families, by ensuring staff participation and ownership of the occupational health and safety responsibilities.
- b. To ensure that the health and safety of the public are not threatened by our operations.
- c. To comply with the occupational health and safety laws and regulations by conducting business according to recognized standards and using the necessary resources to meet the standard.
- d. To maintain and build a constructive relationship with all authorities and meet all operating license and permit requirements and provide a prompt advice service on relevant issues.
- e. To commit our company to the health and safety of contractors during their time with us by enforcing standards and procedures laid down by the company as a minimum code of conduct for all sub-contractors and third parties.

1

TO ACHIEVE THESE OBJECTIVES, WE UNDERTAKE TO:

- a. To motivate, train and educate employees to assume personal ownership of occupational health and safety issues, and in this way accept the implications of their actions on occupational health and safety.
- b. To keep the public informed about our operations through timeous communication when needed.
- c. To focus on the application of appropriate occupational health and safety standards, including sound management, fire protection and good operating practices, to ensure that all possible measures are taken to minimize losses and to avoid accidents.
- d. To promote occupational health and safety awareness and reinforce a responsible behaviour and practices among sub-contractors who are performing work at the company.
- e. To ensure the commitment of all employees to comply with the Act and regulations and to manage and counter the hazards of our company through a well practiced occupational health and safety program.
- f. To ensure that sub-contractors are aware of their obligations regarding education and training in occupational health and safety aspects, supporting their efforts where needed.
- g. To co-operate actively with professional bodies in formulating occupational health and safety standards, with the intent of achieving a fair balance between occupational health and safety priorities and the economical management of the company and the realities of prosperity.

Signed at Marrent at this 1St day of angust 2017

Signature: CEO/MD

2

<u>CODE OF CONDUCT</u>

- 1. Working hours must be strictly and at all times adhered to. Employees may only leave their workstations with permission.
- 2. All employees to be clean, neatly and professionally dressed to the satisfaction of the employer.
- 3. All shifts allocated to employees must be executed as prescribed. Swapping of shifts will not be allowed without prior permission of the employer.
- 4. All orders must be executed and work must be done to an acceptable standard. A third misconduct in this regard could lead to dismissal.
- 5. Employees must always be straightforward and honest. Dishonesty will lead to immediate dismissal.
- 6. No theft of property, removal of parts, materials or equipment without the prior permission of the employer will be allowed. Any misconduct in this regard will lead to immediate dismissal as well as criminal proceedings if necessary.
- 7. All clients will at all times be handled professionally, friendly honestly and honourably.
- 8. No alcohol will be allowed on premises during working hours. Drunkenness or under the influence of Liquor will not be tolerated and will lead to immediate dismissal.
- 9. The employee will be accountable for any damages sustained to property, vehicles, parts or materials whilst under or in his immediate control. The Company is not a Financing Instituted and therefore will not allowed any financial loans.
- 10. No private telephone calls will be allowed to and from the official telephones of the Company.

GENERAL SAFETY RULES

- 1. All electrical wires, -connections, -leads, -plugs and electrical adaptors must be inspected before work commence.
- 2. It must be dry and clean and any loose, faulty or damaged electrical connection, wire, lead, plug or adaptor must immediately be reported to the supervisor for reparation.
- 3. No arc welding, gas welding or grinding allowed near flammable substances in workplace or near or in hazard store.
- 4. All flammable substances to be stored in hazard substances store when not in use.
- 5. No smoking allowed in workplace as well as in or near hazard store.
- 6. Complete overall sets and safety shoes must be worn at all times when in working area.
- 7. Leather aprons, gloves, safety goggles and ark welding helmets must be worn at all times when welding or grinding.
- 8. Working area must be kept clean and tidy at all times any spills, Oil, Fuel, Water whatsoever must be cleaned immediately to prevent slipping, falling as well as Fires.
- 9. All waste products must be removed immediately from working area and dump in containers provided at dumpsite.
- 10. Ear protection must be worn to minimize noise and to protect hearing ability.
- 11. No one will be allowed to operate any machine or equipment without the direct supervision of the specific supervisor.
- 12. No drinking or eating is permitted at worktables, desks or inside working area.
- 13. Employees must be sober at all times when in work place and no one will be allowed to use or operate an machine or equipment when under the influence of liquor
- 14. Employees must be clean, neatly clothed and tidy at all times when in workplace.
- 15. Supervisors and Health and Safety Representatives must see that all machines and equipment are safe, clean and in order before work commence.
- 16. Hairnets, overalls, plastic aprons, gloves, water boots must be worn at all times when working in environment where fresh meat is processed.
- 17. When working in cold conditions for long periods leatherjackets with wool inners, and gloves must be worn at all times.
- 18. When working in wet conditions for long periods, raincoats must be worn at all times.

- 19. No playing between supervisors, employees or other persons will be allowed inside the working area. It just leads to accidents and injuries.
- 20. Accidents and injuries must be reported immediately to your supervisor or Employer.
- 21 All open wounds or sores must be covered when in working area to prevent infections and spreading of diseases.
- 22 All ways been prepared, aware of your surroundings and concentrate on what you are doing. It is everybody's duty to watch out for each other at the workplace and to ensure each and everyone's health and safety at the workplace.

Signed: Employer/CEO/MD

Appendix D: Record of PPE Provision

OVERALL- & SKOENBESTELLING

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		OVERALL	BOOTS
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FREDERIK W	Hutte	381	6
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Appendix E: Record Vehicle Service

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Roetine-diens	10/12/2018	14:00	460000		NORMAL SERVICE
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Roetine-diens	16/08/2019	11:00	8650		ADAM / FREI	MAJOR SER	
Roetine-diens	11/04/2019	11:00	8150		L.BERGH	NORMAL SEI	
Roetine-diens	14/01/2019	09:00	7900		FRED JNR		
Roetine-diens	24/10/2018	12:00	7650		FRED JNR	NORMAL SEF	RVICE
Roetine-diens	30/08/2018	10:00	7400		FRED JNR	NORMAL SER	
Roetine-diens	03/07/2018	12:00	7150		FRED JNR	NORMAL SEF	
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Roetine-diens	16/04/2018	14:00	6900		FRED JNR	NORMAL SEF	
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