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For Barzani Mining (Pty) Ltd  
Ref No. (10778) MP

The DMRE  
North-West Region  
Cnr Margaretha Prinsloo,  
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2571

11 February 2025

**APPLICATION FOR CLOSURE CERTIFICATE IN TERMS OF REGULATION 57 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002) FOR A MINING PERMIT ISSUED TO BARZANI MINING (PTY) LTD NW 30/5/1/3/2/10778 MP ON PORTION OF PORTION 3 ON THE FARM TWEELAAGTE 175 JP, MAGISTERIAL DISTRICT OF MANKWE.**

Please find application for closure certificate for mining permit issued to Barzani Mining (Pty) Ltd

The following documents attached hereon:

1. Closure Plan
2. Form P
3. Financial Guarantee
4. Mining Permit
5. CV of Environmental Mineral Resource Consultant

Hope you find the above in order

Kind Regards

**Sunday M Mabaso**  
Vahlegwe Mining Advisory and Consulting



# **BARZANI MINING (PTY) LTD**

## **CLOSURE PLAN, RISK ASSESSMENT REPORT AND FINAL PERFORMANCE REPORT**

**DMRE REF NUMBER: NW30/5/1/3/2 (10778) MP**

**FOR**

**THE MINING PERMIT OF CHROME ORE FOR BARZANI (PTY) LTD IN  
RESPECT OF PORTION OF PORTION 3 OF THE FARM  
TWEELAAGTE 175 JP IN THE MAGISTERIAL DISTRICT OF  
MANKWE, NORTH-WEST PROVINCE.**

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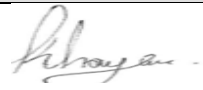



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**Prepared for:**

Barzani Mining (Pty) Ltd

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## **EXECUTIVE SUMMARY**

Barzani Mining (Pty) Ltd hereafter referred as 'Barzani Mining' or 'permit holder' was issued with a Mining Permit in terms of Section 27 of the Mineral and Petroleum Resource Development Act, 2002 (Act 28 of 2002) (as amended) on the 11<sup>th</sup> of May 2022. The Mining Permit was issued with DMRE reference number NW 30/5/1/3/2/10778 MP for mining chrome ore in respect of Portion of Portion 3 of the Farm Tweelaagte 175 in the Magisterial District of Mankwe, covering an extent of approximately 5 ha.

The permit holder is applying for a closure certificate in terms of Section 43 of the MPRDA, 2002 (Act 28 of 2002) (as amended) due to the lapsing of the Mining Permit where mining operation never occurred due to various reasons including in the main, illegal mining activities surrounding the permit area thus posing security challenges. Barzani Mining has therefore appointed Vahlengwe Mining Advisory and Consulting (Pty) Ltd hereafter referred as 'Vahlengwe' to compile a closure plan in terms of Regulation 62 of the MPRDA, 2002 (Act 28 of 2002) (as amended) and Appendix 5 of the NEMA Act, 1998 (Act No. 107 of 1998): Environmental Impact Assessment Regulation (2014) (as amended). It is further required that the Closure plan be accompanied by an environmental risk assessment report in terms of Regulation 60 of the MPRDA, 2002 (Act 28 of 2002) (as amended): MPRDA Regulations.

The mining activities intended infrastructure establishment with the installation of mobile offices, portable ablutions, operation, administration, decommissioning and rehabilitation of the disturbed area. Operations under this permit have been unable to commence due to the persistent presence of illegal miners on the site. Efforts to remove the illegal miners have been unsuccessful, resulting in significant security and safety concerns and operational impediments. Consequently, it has become clear that proceeding with the mining activities as originally planned is not feasible.

**General Terms and Abbreviations:**

DMRE	Department of Mineral Resources and Energy.
DWS	Department of Water and Sanitation
EA	Environmental Authorization.
EMP	Environmental Management Plan.
ECO	Environmental Control Officer.
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act
NWA	National Water Act
WML	Waste Management License
WULA	Water Use Licence Application

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## **1. INTRODUCTION AND BACKGROUND**

### **1.1 INTRODUCTION**

Barzani Mining (Pty) Ltd hereafter referred as 'Barzani Mining' or 'permit holder' was issued with a Mining Permit in terms of Section 27 of the Mineral and Petroleum Resource Development Act, 2002 (Act 28 of 2002) (as amended) on the 11<sup>th</sup> of May 2022 for two (2) years thus lapsed on 10 May 2024. The Mining Permit was issued with DMRE reference number NW 30/5/1/3/2/ 10778 MP for the mining of chrome ore in respect of a Portion of Portion 3 of the Farm Tweelaagte 175 JP in the Magisterial District of Mankwe, covering an extent of approximately 5 ha (see Appendix C).

The permit holder is applying for a closure certificate following the lapsing of the Mining Permit and subsequent cessation of the mining operation in terms of Section 43 of the MPRDA, 2002 (Act 28 of 2002)(as amended). Barzani Mining has therefore appointed Vahlegwe Mining Advisory and Consulting (Pty) Ltd hereafter referred as 'Vahlegwe' to compile a closure plan in terms of Regulation 62 of the MPRDA, 2002 (Act 28 of 2002) (as amended) and Appendix 5 of the NEMA Act, 1998 (Act No. 107 of 1998): Environmental Impact Assessment Regulation (2014) (as amended). It is further required that the Closure plan be accompanied by an environmental risk assessment report in terms of Regulation 60 of the MPRDA, 2002 (Act 28 of 2002)(as amended): MPRDA Regulations.

### **1.2. PROJECT DESCRIPTION**

The mining activities intended infrastructure establishment with the installation of mobile offices, portable ablutions, operation, administration, decommissioning and rehabilitation of the disturbed area. Operations under this permit have been unable to commence due to the persistent presence of illegal miners on the site. Efforts to remove the illegal miners have been unsuccessful, resulting in significant safety concerns and operational impediments. Consequently, it has become clear that proceeding with the mining activities as originally planned is not feasible.

The closure of the mine permit is driven by the lapsing of the mining permit and subsequent abandonment of all planned mining operations.

### 1.3. LOCALITY OF THE MINING AREA

The mining permit area is located on a Portion of Portion 3 of the Farm Tweelaagte 175 JP in the Magisterial District of Mankwe, North-West Province as provided in Table 1 below. It is situated approximately 34km northwest of Sun City, 72km northwest of Rustenburg and 47km west of Pilanesburg just off the R565. The locality of the area is illustrated in figure 1 below.

Table 1: Details of the overall activity location

Description	Details
<b>Farm Name</b>	Portion of Portion 3 of the Farm Tweelaagte 175 JP
<b>Closure Application Area (ha)</b>	The mining permit area covers an extent of approximately 5 ha
<b>Magisterial district</b>	The mining permit area is located within the Magisterial District of Mankwe.
<b>Distance and direction from nearest town</b>	It is situated approximately 34km northwest of Sun City, 72km northwest of Rustenburg and 47km west of Pilanesburg just off the R565.
<b>21-digit Surveyor General Code for each farm portion</b>	T0JP00000000017500003



Figure 1: Locality Map of the Mining permit area.

## 2. DETAILS OF THE APPLICANT AND THE EAP

### 2.1. APPLICANT DETAILS

The applicant for the project is Barzani Mining (Pty) Ltd. Details are provided in Table 2 below.

Table 2: Details of the applicant

<b>Name of Applicant:</b>	Barzani Mining (Pty) Ltd		
<b>Registration number (if any):</b>	2019/199763/07		
<b>Trading name (if any):</b>	Barzani Mining (Pty) Ltd		
<b>Responsible person: (E.g., CEO, Director, etc.)</b>	Noël Marx (previously Thabo Moloto)		
<b>Contact person:</b>	Noël Marx		
<b>Physical address:</b>	35 Tegel Ave, Highveld, Centurion, 0157, Tshwane		
<b>Postal address:</b>	35 Tegel Ave, Highveld, Centurion, 0157, Tshwane		
<b>Postal code:</b>	0157	<b>Cellphone:</b>	0832911645
<b>Email:</b>	noel@gic.co.za		

## 2.2 ENVIRONMENTAL CONSULTANTS

Vahlegwe Mining Advisory and Consulting is the appointed independent Environmental Assessment Practitioner (EAP) to compile a closure application in terms of Regulation 62 of the MPRDA, 2002 (Act 28 of 2002) (as amended) and Appendix 5 of the NEMA Act, 1998 (Act No. 107 of 1998): Environmental Impact Assessment Regulation (2014) (as amended) for the mining permit activities in respect of Portion of Portion 3 of the Farm Tweelaagte 175 JP in the Magisterial District of Mankwe, North-West Province.

### 2.2.1. DETAILS OF THE EAP WHO PREPARED THE REPORT

The qualifications and experience of the EAP's project manager who have undertaken the closure process are provided in Table 3.

Table 3: Expertise of the EAP

<b>NAME</b>	Sunday Mabaso
<b>QUALIFICATIONS</b>	GDE: Mining Engineering, Certificate: Mine Closure and Rehabilitation, MBA, Postgrad Certificate: Climate Change and Energy Law,
<b>RESPONSIBILITY ON PROJECT</b>	Project Lead and Reviewer
<b>PROFESSIONAL REGISTRATION</b>	EAPASA (Reg. No. 2022/4485)
<b>EXPERIENCE</b>	<p>Sunday M. Mabaso is the Principal Consultant with more than 20 years of service at the Department of Mineral Resources and Energy of which he served seven (7) years as a Regional Manager (3 years in Northern Cape and 4 years in Gauteng). He has acquired various qualifications in mining and in 2021 completed an MBA with Milpark Business School and a Post Graduate Certificate in Climate Change and Energy Law with the University of the Witwatersrand, Mine Closure and Rehabilitation with the University of Pretoria.</p> <p>His experience includes monitoring and enforcing compliance with Social and Labour Plan and Mine Economics in terms of the MPRDA and the Mining Charter, Environmental Management and Waste Management in terms of NEMA and NEM: Waste Act. Sunday has recently published several papers including, Legacy Gold Mine Sites &amp; Dumps in the Witwatersrand: Challenges and Required Action in the Journal of Natural Resources, Vol 14, 2023.</p>

	<a href="https://doi.org/10.4236/nr.2023.145005">https://doi.org/10.4236/nr.2023.145005</a> Social and Environmental Challenges caused by Legacy Gold Mining in Johannesburg: Government's Action Plan. eBook: ISBN: 978-81-19491-53-7. DOI: 10.9734/bpi/npgees/v9/10672F
<b>NAME</b>	Khanyile Mgiba-Mutero
<b>QUALIFICATIONS</b>	Higher Certificate in Life and Environmental Science, currently studying towards a Bachelor of Arts in Environmental Management with University of South Africa (UNISA)
<b>RESPONSIBILITY ON PROJECT</b>	Report Compiler (Trainee)
<b>PROFESSIONAL REGISTRATION</b>	SACNASP Student (169444)
<b>EXPERIENCE</b>	Khanyile Mgiba-Mutero is an environmental trainee who has 2 years working experience in the Environmental Management field. She has a University of South Africa Higher Certificate in Life and Environmental Science and is currently studying towards BA in Environmental Management 3 <sup>rd</sup> Level at the University of South Africa. She has performed environmental assessments (BAR), Mine Closure and Water Use Licence Application (WULA), and environmental compliance auditing. Her core competencies include research and report writing.

### 3. MOTIVATION FOR CLOSURE OF THE MINING PERMIT

The closure of Barzani Mining mine permit is driven by the lapsing of the mining permit as a result, the permit holder has decided not to proceed with renewal of the permit due to the scale of illegal mining surrounding the mining permit area which renders mining operations impractical.

### 4. THE OBJECTIVES OF A CLOSURE PLAN

In terms of Regulation 61 of the MPRDA Regulations, 2004 (as amended) closure objectives form part of the environmental authorisation, as the case may be, and must -

- identify the key objectives for mine closure to guide the project design, development and management of environmental impacts in accordance with the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014;
- provide broad future land use objective(s) for the site; and



- provide proposed closure costs in accordance with the National Environmental Management Act, 1998 and the Financial Provision Regulations, 2015.

#### **4.1. REGULATORY REQUIREMENTS**

South African mining legislation and policy framework places the ultimate responsibility for mitigating environmental and social damage resulting from mining-related activities on mineral right holders and those who undertake these activities. Therefore, there is liability for all mining-related practices throughout their lifespan. This includes mandatory legislative obligations for remediation and/or rehabilitation and ultimate close out. The main relevant legislation that applies to rehabilitation and closure includes the following:

Section 43 of the MPRDA, 2002 (Act 28 of 2002) stipulates that:

(1) The holder of a prospecting right, mining right, retention permit or mining permit remains responsible for any environmental liability, pollution or ecological degradation, compliance to the conditions of the environmental authorisation and the management and closure thereof, until the Minister has issued a closure certificate to the holder concerned.

(2) On written application by the holder of a prospecting right, mining right or mining permit in the prescribed manner, the Minister may transfer such environmental liabilities and responsibilities as may be identified in the environmental management plan or the environmental management programme and any prescribed closure plan to a person with such qualifications as may be prescribed.

(3) The holder of a prospecting right, mining right, retention permit or mining permit or the person contemplated in subsection (2), as the case may be, must apply for a closure certificate upon—

- (a) the lapsing, abandonment or cancellation of the right or permit in question;
- (b) cessation of the prospecting or mining operation;
- (c) the relinquishment of any portion of the prospecting of the land to which a right, permit or permission relate; or
- (d) completion of the prescribed closing plan to which a right, permit or permission relate.

(4) 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) and must be accompanied by the prescribed environmental risk report.

(5) No closure certificate may be issued unless the Chief Inspector and the Department of Water Affairs and Department of Forestry, Fisheries and Environment have confirmed in writing that the provisions pertaining to health and safety and management of potential pollution to water resources have been addressed

Other legislative framework includes:

- National Environmental Management Act (Act No. 107 of 1998) (NEMA);
- National Environmental Management Waste Act (Act 59 of 2008): and
- National Water Act (Act 36 of 1998) (NWA).

## **5. CONTENT OF THE CLOSURE PLAN IN TERMS OF APPENDIX 5 OF NEMA: REGULATIONS**

### **5.1. DETAILS AND EXPERTISE OF THE EAP**

(Refer to section 2.1 of this report)

### **5.2. CLOSURE OBJECTIVES**

The closure objectives which were applicable for the rehabilitation for Barzani Mining as per the approved EMPr are:

The most important action is to ensure the successful rehabilitation of all disturbed surfaces and the establishment and strong sustainable growth of indigenous vegetation is a firm closure objective.

**Topography** - Not applicable.

- **Soils** - Not applicable.

**Capability** - Not applicable.

- **Land use** - Not applicable.
- **Vegetation** - Not applicable.
- **Wildlife** - Not applicable.

**Surface water** - Not applicable.

- **Ground water** - No applicable.



**Air quality** - Not applicable.

- **Dust** - Not applicable.
- **Noise** – Not applicable.
- **Visual aspects** - Not applicable.

**Cultural history** - Not applicable.

**Sensitive areas** - Not applicable.

**Socio-economic structure** - Not applicable.

**Final Land Use/ Closure Proposal** - Not applicable.

.

### **5.3. PROPOSED MECHANISMS FOR MONITORING COMPLIANCE WITH AND PERFORMANCE ASSESSMENT AGAINST THE CLOSURE PLAN AND REPORTING THEREON**

The permit holder has within their EMPr indicated that the proposed mechanism for monitoring compliance will include the following:

#### **List of identified impacts requiring monitoring programmes.**

- Ground and surface water quality.
- Soil contamination and erosion.
- Road management.
- Waste management.
- Stakeholder outrage.

#### **Functional requirements for monitoring programmes.**

- Regular monitoring of all the environmental management measures and components shall be carried out by the holder of the mining permit in order to ensure that the provisions of this programme are adhered to.
- On-going and regular reporting of the progress of implementation of this programme will be done.
- Various points of compliance will be identified with regard to the various impacts that the operations will have on the environment.
- Inspections and monitoring shall be carried out on both the implementation of the programme and the impact on sensitive environments.

- Visual inspections on erosion and physical pollution shall be carried out on a regular basis.

#### **Compliance reporting / submission of information**

- Any significant variation in the mining activity that will require changes to the EMP will be updated and communicated with the department before such changes are implemented.
- Reports confirming compliance with various points identified in the environmental management programme or plans will be submitted to the Regional Manager on a regular basis and as decided by the said manager.
- Any emergency or unforeseen impact will be reported as soon as possible.
- An assessment of environmental impacts that were not properly addressed or were unknown when the programme was compiled shall be carried out and added as a corrective action.

#### **5.4. MEASURES TO REHABILITATE THE ENVIRONMENT AND MITIGATION MEASURES TO ADDRESS THE ENVIRONMENTAL IMPACTS**

The rehabilitation plan was developed to achieve the following critical closure objectives:

- Stability: The disturbed area (s) will need to be landscaped covered with the pre stripped topsoil and grassed using indigenous grass species to prevent erosion of the area.
- All excavated areas will be refilled with excess material and shaped to get it to safe enough angles.
- Any oil or diesel that is spilled will be collected with the contaminated soil and disposed of through a registered waste oil contractor.
- Any additional roads created in and around the site will be rehabilitated as necessary to prevent reoccurrence of erosion.
- Any additional roads created in and around the site will be rehabilitated as necessary to prevent reoccurrence of erosion.
- Rehabilitation of high benches by addition of material to create benches with stable slope.
- Concurrent rehabilitation of borrow-pit and the planting of trees and grasses. For example:

All surfaces covered by the material storage areas and other cleared areas must be ripped to enhance vegetation growth. Vegetation establishment will be through the seeding or planting of indigenous grass that occurs in the area.

The establishment of indigenous grass vegetation on the disturbed compacted surfaces may include the following species and specifications:

Rhodes Grass (*Chloris gyana*): 2,5kg / ha

Smut's Finger Grass: (*Digitaria eriantha*): 2,5 kg/ ha

Blue Buffalo Grass: (*Panicum maximum*): 2,5 kg/ha

Eragrostis teff: 2,5 kg/ha

Approximately 10kg grass mixture per 1 ha slopes to be rehabilitated.

However, the vegetation has not been disturbed since mining operation did not take place.

## **5.5. DESCRIPTION OF THE MANNER IN WHICH IT INTENDS TO—**

### **5.5.1. MODIFY, REMEDY, CONTROL OR STOP ANY ACTION, ACTIVITY OR PROCESS WHICH CAUSES POLLUTION OR ENVIRONMENTAL DEGRADATION DURING CLOSURE**

The MPRDA Regulations (2004) (as amended) requires that the mine implement procedures to manage environmental related emergencies and remediation which may cause pollution or environmental degradation. The following define most likely potential environmental emergencies:

- Pollution due to spills / leaks of hydrocarbons and resulting damage to ecological systems and groundwater resources;
- Flooding of mining areas;
- Accidents during transport of material; and
- Other environmental emergencies requiring special services.

### **5.5.2. COMPLY WITH ANY PRESCRIBED ENVIRONMENTAL MANAGEMENT STANDARDS OR PRACTICES**

The standard procedure aims to identify the procedure to be followed should environmental emergencies occur. These are:

- To ensure quick and controlled response to environmental emergencies through the use of correct personnel and equipment;

- To prevent incidents from becoming more extensive through the timeous contact and arrival of trained personnel on site;
- To establish a management mechanism from which a range of safety, environmental and health issues can be dealt with should they arise;
- To establish a reporting procedure to management

### **5.5.3. COMPLY WITH ANY APPLICABLE PROVISIONS OF THE ACT REGARDING CLOSURE**

Existing legislation requires mines to implement emergency measures in the mining industry and to inform the relevant government departments of incidents and accidents. The following provisions apply to mining:

- Regulation 51 of Regulations under the Minerals and Petroleum Resources Development Act, 2002 (Act 28 of 2002) – Procedure for environmental related emergency and remediation.
- Mine Health & Safety Act 29 of 1996 – Mine management should ensure and maintain a safe and healthy environment at the mine, during commissioning, decommissioning and closure.

### **5.6. RECORD OF INTERESTED AND AFFECTED PERSONS CONSULTED**

The mining permit area is situated on communal land the Chief of the nearby village.

### **5.7. WHERE APPLICABLE, DETAILS OF ANY FINANCIAL PROVISION FOR THE REHABILITATION, CLOSURE AND ONGOING POST DECOMMISSIONING MANAGEMENT OF NEGATIVE ENVIRONMENTAL IMPACTS**

The permit holder's financial guarantee of R220 505.00 was accepted and considered more than sufficient and is deemed a surplus, as no additional funds will be necessary for rehabilitation and after closure. The mining activities never occurred before and after the mining permit has expired, thus it cannot be re-commissioned without a new environmental authorization under NEMA and a mining permit under the MPRDA.

## 6. CONTENT OF THE ENVIRONMENTAL RISK REPORT IN TERMS OF SECTION 60 OF THE MPRDA, 2002 (ACT 28 OF 2002) (AS AMENDED): MPRDA REGULATIONS

### 6.1. THE UNDERTAKING OF A SCREENING LEVEL ENVIRONMENTAL RISK ASSESSMENT

Mining activities result in environmental impacts and actions to mitigate the negative environmental impacts are required to minimise the environmental risks. The objective of the environmental risk assessment is to assess the long-term sustainability of the rehabilitation. The risk associated with the potential impact are determined using the synthesis on the table below:

Table 4: Table of the risk identification

Aspect	Description	Weight
Probability (P)	Improbable	1
	Probable	2
	Highly probable	4
	Definite	5
Duration (D)	Short term	1
	Medium term	3
	Long term	4
	Permanent	5
Scale (S)	Local	1
	Site	2
	Regional	3
Magnitude/Severity	Low	2
	Medium	6
	High	8
Significance	Sum (Duration, scale, magnitude) x Probability	
	Negligible	<20
	Low	<40
	Moderate	<60
	High	>60

Table 5: Table of the colour coding of the significance of residual impacts

Colour	Significance
Red	Impact of high significance
Yellow	Impact of moderate significance
Green	Impact of low significance
Blue	Impact of unknown or negligables

Using the combination of these criteria impacts can be assigned a rating of a potential risk, uncertain risk and significant risk.

#### POTENTIAL SIGNIFICANT RISK

Impact will be of potential significant risk if any of the following applies:

- The extent is national to international,
- The duration is long term to permanent,
- The magnitude will be high and above the acceptable standard, and
- Requires extensive intervention to mitigate the impacts

#### UNCERTAIN RISK

Impact will be of moderate significant risk if any of the following applies:

- The extent is local to regional,
- The duration is medium to long term,
- The magnitude is above the acceptable standard, and
- The environmental impacts are uncertain and may require some interventions to limit the impacts in future

#### INSIGNIFICANT RISK

Impact will be of low significant risk if any of the following applies:

- The extent is site specific,
- The duration is temporary,
- The magnitude is within the acceptable standard, and
- The environmental is ecologically and physically stable and no further interventions will be required in future.

## 6.2. THE SECOND LEVEL RISK ASSESSMENT

The levels remained the same, since the permit is not liable for the mining activities that are happening on site.

Table 6: Table of the second level risk assessment

Vegetation	Disturbed sites and species of ecological importance. Disturbed vegetation cover. Disturbed sites and species of ecological importance. Loss of indigenous vegetation and biodiversity. Invasion of the alien vegetation species.	Utilization of the existing access points as far as possible. Removal of vegetation in a phased approach. Implementation of the alien invasive vegetation species management plan.	Pre – Mitigation			
			1	3	1	L (-)
			Post – Mitigation			
Animal Life	Disrupted the animal life and activities due to the existence of the waste material. Disruption of animal life due to the ongoing operations. Displaced animal habitat.	Conduct environmental awareness and training about the animal life on site. Restrictions on the killing of animals on site. Cautious implementation of the waste material management measure.	Pre – Mitigation			
			1	3	1	L (-)
			Post – Mitigation			
Soils and Land Capability	Soil erosion, generation of AMDs, loss of soil nutrients and changes in soil properties. Soil compaction. Soil contamination due to oil spillages. Land incapable for other uses due to the existence of the waste material.	Temporary erosion control measures. Regular road maintenance. Vehicle movement should be restricted to designated areas and access roads. A cleaned-up of any hydro-carbon spills. Implementation of the Bioremediation. Fuel storage areas on concrete and bunded surfaces.	Pre – Mitigation			
			2	3	3	M (-)
			Post – Mitigation			
Surface water	Exposed toxic elements may react with rainwater and generate AMD. Disrupted natural drainage and runoff. Sedimentation and siltation of water courses Degradation of surface water quality	Remedy the effects of alteration to natural drainage lines. Implementing the hydrocarbon spillages management plan. Implement the erosion control measures. Management measures and removal of the source of toxic elements.	Pre – Mitigation			
			2	2	2	L (-)
			Post – Mitigation			
Groundwater	Degradation of groundwater quality due contaminated by the seepage of toxic elements from the waste material and hydrocarbon from the oil spills.	Remediate using commercially available emergency clean up kits. Regular maintenance and servicing of equipment. Management measures and removal of the source of toxic elements.	Pre – Mitigation			
			2	2	2	L (-)
			Post – Mitigation			
Noise	Increase in ambient noise levels during the operational phase; Disturbances to faunal species during the operational phase.	Limiting the site establishment activities working hours to daylight hours (07h00 to 17h00) and not undertaking such activities at all on Sundays and public holidays. No operation will be undertaken on Sundays (only maintenance) and public holidays. Implement noise monitoring. Ensure noise emissions are minimised by regularly servicing all vehicles and placing silencers on their engines.	Pre – Mitigation			
			1	2	2	L (-)
			Post – Mitigation			
			1	2	2	L (-)

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Air Quality/Dust	Possible dust generation in some areas including the drilling during operations; Detrimental effects on plants. Health impacts on animals and people.	Implementation of dust control measures such as dust suppression dust fall-out monitoring. Enforcing the speed limits to reduce dust created by moving vehicles;	Pre – Mitigation			
			1	2	2	L (-)
			Post – Mitigation			
Visual	Visual disturbance due to site operations. Dust generation. Disrupted environmental aesthetic due to the presence of the waste material.	Use of barricade fence covers where possible to minimise the visual impact. Implementation of the dust management measures. Removal of the waste material.	1	2	1	L (-)
			Pre – Mitigation			
			2	3	3	M (-)
Socio-economic	Employment opportunities. Knowledge and skills transfer. Empowerment of the local businesses.	Establish targets for employment and training. Effective implementation of training and skills development initiatives. Prioritizing the sourcing available skills from the host community; Transparency with the community members about the availability of employment opportunities. Community engagement. Ensure that goods and services are procured from within the local area as far as possible.	Post – Mitigation			
			2	3	3	M (-)
			Pre – Mitigation			
Cultural and Heritage Resources	There are no known important heritage resources on the site.	Conduct Identification of all possible sites of archaeological value. Identified sites must be clearly demarcated as no-go areas. Reporting of any heritage resources encountered to the relevant authorities.	2	3	1	L (+)
			Post – Mitigation			
			2	3	1	L (+)
Waste	Generation of various types of waste. Environmental pollution including soil and water resources contamination.	Classification and separation of the waste. Prohibition of uncontrolled disposal of waste on site.	Pre and post mitigation			
			2	3	1	L (+)
			Pre – Mitigation			
Safety	Occupational injuries. Criminal Activities due to zama-zama's resistance. Illegal mining activities that are also associated with criminal activities.	Ensure that there is a controlled access to the site. Consult with the local police branch to establish standard operating procedures for the control and/or removal of loiterers. Safety signs and barricades must be placed around the operation site. All project infrastructure should be placed in a secured area. Operational sites must be clearly demarcated.	1	1	1	L (-)
			Post – Mitigation			
			1	1	1	L (-)
Health	The dust potentially containing hazardous substances and particulate matter, which can be inhaled, causing respiratory diseases.	Make available, maintain, and effectively implement a grievance/complaint register.  Provision of appropriate personal protective equipment (PPE).  Placing of safety signs around the operation area.  Induction should be conducted to all employees or sub-contractors entering site to ensure the awareness of the developed health and safety plan;	Pre – Mitigation			
			2	3	2	M (-)
			Post – Mitigation			
			2	3	2	M (-)



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		Daily inspections and observations of on-site activities shall be conducted;  All incidents to be reported, recorded, investigated, and mitigated.  Safety signs to be provided in areas considered as high-risk areas;  Provided adequate first aid services on site; and  Promote ongoing health and safety awareness campaigns.				
Traffic	Addition of traffic to the existing local traffic. Impacts on surface quality of the road impacted resulting from vehicle movement	Vehicles and trucks will access the site via existing roads.  Management and maintenance of the sections of existing road surfaces which have been impacted on by the vehicle movement.  Existing road surfaces must be utilised and maintained within baseline levels.	Pre – Mitigation			
			1	3	1	L (-)
			Post – Mitigation			
			1	3	1	L (-)
Topography	The removal of the waste dumps may alter the man-made topography to its natural state.	Temporary erosion control measures such as the runoff berms must be implemented to reduce flow velocity should be implemented around the operation areas.	Pre – Mitigation			
			1	3	1	L (-)
			Post – Mitigation			
			1	3	1	L (-)
*Si – Significance *L – Likelihood of consequences *R – Residual Risks *Se – Consequences VL – Very Low; L – Low; M – Medium; H – High						

### **6.3. RISKS CLASSIFIED AS POSING POTENTIAL SIGNIFICANT RISKS**

Not applicable

### **6.4. RE-EVALUATED AND RE-CLASSIFIED OF UNCERTAIN RISKS**

Not applicable

### **6.5. STATUS OF INSIGNIFICANT RISKS**

The mining permit has lapsed, and the site is infested by illegal miners. Consequently, recommissioning is not feasible without obtaining new environmental authorization under NEMA and a new mining permit under the MPRDA.

### **6.6. ALTERNATIVE RISK PREVENTION OR MANAGEMENT STRATEGIES FOR POTENTIAL SIGNIFICANT RISKS**

There are no potential significant risks on site since the mine was never developed by the permit holder and no mining activities occurred.

### **6.7. MANAGEMENT MEASURES TO BE IMPLEMENTED FOR THE POTENTIAL SIGNIFICANT RISKS**

The mining permit, although granted, remained doormat and was never utilized to initiate mining operations, resulting in no extraction or related activities at the designated site by the permit holder, there are no management measures to be implemented for the potential significant risks required in this instance.

#### **6.7.1 LONG-TERM RESULT OF THE APPLIED MANAGEMENT MEASURES**

Not applicable.

#### **6.7.2 RESIDUAL AND LATENT IMPACT AFTER IMPLEMENTATING THE MANAGEMENT MEASURES**

There will not be any implementation of management measure or rehabilitation since the permit holder never utilized the site for the intended mining activities.

#### **6.7.3 TIME FRAMES AND SCHEDULE FOR THE IMPLEMENTATION OF THE MANAGEMENT MEASURES**

Not applicable

#### **6.7.4. RESPONSIBILITIES FOR IMPLEMENTATION AND LONG-TERM MAINTENANCE OF THE MANAGEMENT MEASURES**

Not applicable

#### **6.7.5. FINANCIAL PROVISION FOR LONG-TERM MAINTENANCE**

The permit holder has a financial provision in a form of a financial guarantee of R220 505.00 in cash payment to the DMRE Rehab account. The amount provided as financial provision for this project is therefore deemed acceptable since no rehabilitation work will be conducted that will be requiring the financial provision in this regard.

#### **6.7.6. MONITORING PROGRAMMES TO BE IMPLEMENTED**

Not applicable

### **7. CONTENT OF THE FINAL ENVIRONMENTAL PERFORMANCE REPORT IN TERMS OF APPENDIX 7 OF NEMA, 1998 (ACT NO. 107 OF 1998): AMENDMENTS TO THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014**

#### **7.1. DETAILS AND THE EXPERTISE OF THE INDEPENDENT PERSON WHO PREPARED THE ENVIRONMENTAL AUDIT REPORT**

(Refer to section 2.1 of this report)

#### **7.2. A DECLARATION THAT THE INDEPENDENT AUDITOR IS INDEPENDENT**

I, Sunday Mabaso, as independent Environmental Assessment Practitioner hereby declare/affirm the correctness of the information provided or to be provided as part of the audit report, and that I:

- in terms of the general requirement to be independent, other than fair remuneration for work performed/to be performed in terms of this audit report, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity.
- undertake the performance assessment on information provided to me by the proponent, and additional information obtained during the assessment period; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations (2014) of South Africa, as amended.



Signature of the Environmental Assessment Practitioner:

VahleNGWE Mining Advisory and Consulting

### **7.3. SCOPE AND PURPOSE OF THE ENVIRONMENTAL AUDIT REPORT**

The purpose of this environmental performance report is, in terms of the NEMA Regulations, to—

- (a) report on
  - (i) the level of compliance with the conditions of the the EMPr; and
  - (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan achieves the objectives and outcomes of the EMPr
- (b) identify and assess any new impacts and risks as a result of undertaking the activity;
- (c) evaluate the effectiveness of the EMPr;
- (d) identify shortcomings in the EMPr; and
- (e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

### **7.4. METHODOLOGY IN PREPARING THE ENVIRONMENTAL AUDIT REPORT**

The Audit Methodology Process is broken up into four steps, namely:

- Document review;
- Developing the audit checklist.
- Audit assessment; and
- Compiling the audit report.

#### **7.4.1. DOCUMENT REVIEW**

Documents reviewed as part of the audit comprise:

- Mining Permit: Barzani Mining (Pty) Ltd with DMRE reference number NW 30/5/1/3/2/10778 MP
- EMP for the mining of the mining permit of chrome ore covering 5 ha of the portion of portion 3 of the farm Tweelaagte 175 JP in the Magisterial District of Mankwe.
- Other technical documents relevant for the operation to determine the level of commitment taken to mitigate the risk associated with the mining activities.

#### 7.4.2. AUDIT CHECKLIST

A checklist was compiled which is used during the site visits to assess whether the current mining activities are complying with the commitments within the EMPR (refer to Appendix I). An adequacy rating is used to rate the level of compliance and is summarised in the table below:

#### 7.4.3. AUDIT ASSESSMENT

The adequacy rating was developed to evaluate each EMPr measures and assess if it provides adequate avoidance, management and mitigation of potential impacts. EMP measures have been rated according to the criteria presented in Table 7.

Table 7: Table of the compliance adequacy rating

Adequacy Rating	Description	
3	Full compliance	condition was fully complied with
2	Partial	Condition has not been fully complied with and requires additional measures to obtain full compliance.
1	Poor	Condition has not been complied with.
0	Not Applicable	Condition currently not applicable to the phase of the mining operations. These conditions do not contribute to the audit scoring.



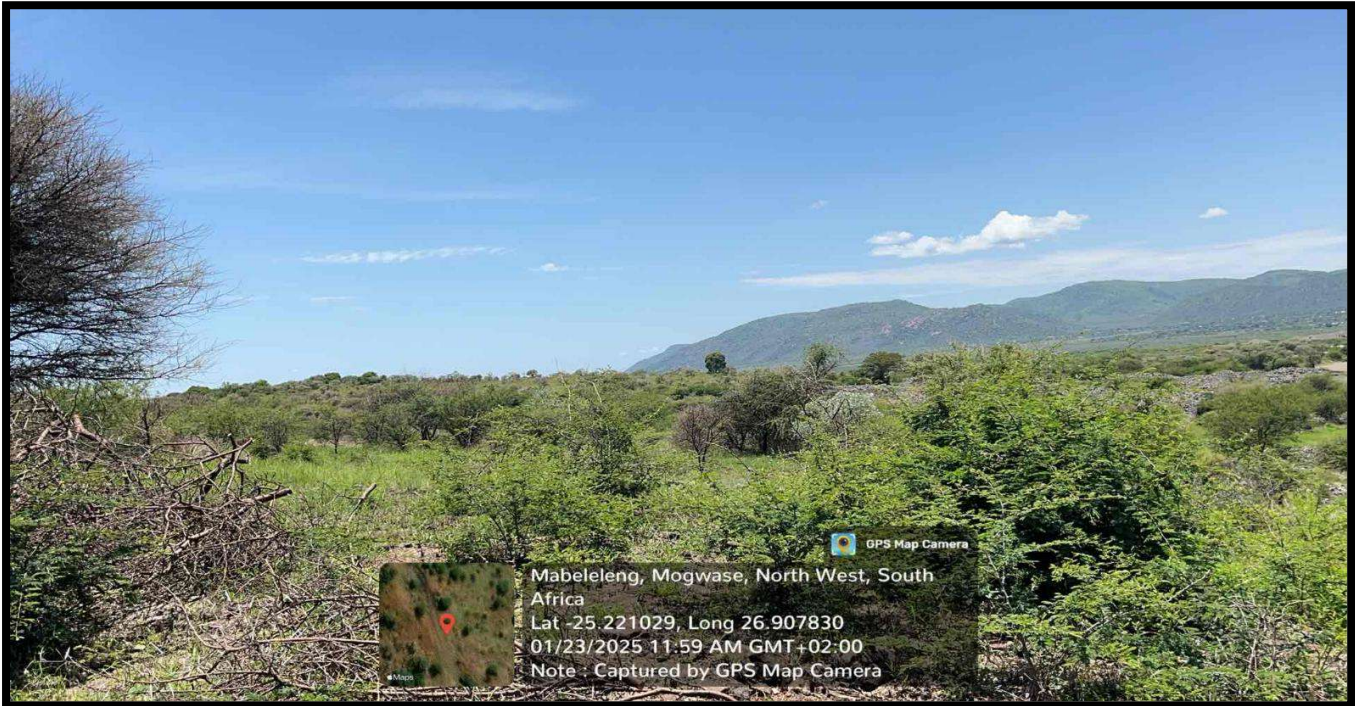


Figure 2: Mining permit area



Figure 3: This picture shows some of the activities that are happening around the mining permit area.

## 7.5. FINDINGS OF THE EFFECTIVENESS AND COMPLIANCE LEVEL WITH THE EMP

Although granted, the permit holder did not commence with the mining activities and an environmental impact audit was not done due to the persistent presence of illegal miners on the designated site; therefore, the table is deemed not applicable.

Table 8: Table of the summary compliance findings.

Aspects	Compliance			
	Full Compliance	Partial Compliance	Non-Compliance	Not Applicable
Regulatory Requirements				
Soil				
Noise				
Air Quality				
Vegetation				
Heritage Resources				
General operation	NOT APPLICABLE			
Social impact				
Water quality				
Waste Management				
Protected Areas				
Topography and Geology				
House keeping				
Health and Safety				
Total				
Total Compliance Percentage (%)				

## 7.6. ASSUMPTIONS MADE, AND ANY UNCERTAINTIES OR GAPS IN KNOWLEDGE

There were no assumptions, uncertainties or gaps in knowledge.

### **7.7. EVALUATION OF THE EFFECTIVENESS OF THE EMPr**

The EMPr presents a comprehensive assessment of the potential impacts from the proposed project. Overall, the EMPr is considered effective in identifying and assessing the impacts by the mining activities. However, no mining activities were implemented in this case.

### **7.8. IDENTIFICATION OF SHORTCOMINGS OF THE EMPr**

There are no potential impacts that have been identified and therefore the audit has not identified any shortcoming in the EMPr since the mine was never developed or constructed by the permit holder.

### **7.9. IDENTIFICATION OF THE NEED FOR CHANGES TO THE EMP**

The mining activities have ceased, and the permit holder is therefore applying for closure. The funds for the closure had been accounted for.

## **8. CONCLUSIONS AND RECOMMENDATIONS**

Operations under this permit have been unable to commence due to the ongoing presence of illegal miners on the surrounding sites. Efforts to remove these illegal miners have not been successful, leading to serious security and safety concerns and hindrances to the planned operations. As a result, it has become evident that proceeding with the mining activities as initially planned is not feasible.

During our site visit, we had conversations with some of the community members from the nearby village. They expressed their concerns about the illegal miners in the area and the unsafe conditions this creates for residents. They also mentioned that the site is frequently guarded by police for safety reasons.

In light of these ongoing challenges, Barzani Mining seeks the closure of the mining permit.



## **APPENDIX A: CV of the EAP**

# SUNDAY MISHACK MABASO

12 Thaxted Ave Mulbarton 2190 · 0745697312/0824614251

Email - [sunday@vahleingweadvisory.co.za](mailto:sunday@vahleingweadvisory.co.za) · LinkedIn Profile - Sunday Mabaso · Twitter @Sun.dayMabaso

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## BIOGRAPHY

Mr. Sunday Mabaso is the founder and CEO of Vahleingwe Mining Advisory and Consulting. He's got extensive experience in mineral regulation gained from spending over 20 years (2000 – 2021) with the Department of Mineral Resources and Energy (DMRE) where he served his last seven years as Regional Manager (3 years in Northern Cape and 4 years in Gauteng) before his resignation to advance his career in business. In 2020 was nominated to the Task Team that developed the "South Africa's Exploration Implementation Plan" where he served to its completion and officially gazetted by Minister of Mineral Resources and Energy in 2022.

He holds a National Diploma in Mine Surveying and a National Higher Diploma in Mineral Resource Management from Technikon Witwatersrand in 1999 and 2000 respectively, a Graduate Diploma (GDE) in Mining Engineering from University of Witwatersrand in 2009 and a Master of Business Administration (MBA) from Milpark Business School in 2021. Sunday also completed a Post Graduate Certificate in Climate Change and Energy Law from University of the Witwatersrand in 2021, a Certificate in Energy Efficiency and Sustainability from the University of Cape Town (UCT) in 2022 and Certificate in Mine Closure and Land Rehabilitation from University of Pretoria (UP) in 2022.

Sunday is a registered member of the Institute of Directors of South Africa (IoDSA), the Southern Institute of Mining and Metallurgy (SAIMM) and is an Environmental Assessment Practitioner registered with EAPASA, also a member of the International Association of Impact Assessment South Africa (IAIASa). A committee member of the Environmental, Social and Governance (SAMESG) working group of the SAMCODES Standard Committee (SSC) responsible for developing the South African Mineral Reporting Codes. He has authored opinion and journal articles about South African mining legislation with interests focused on social and environmental impacts on mine communities affected by mining operations, past and present. Some of his articles are published in academic journals and books internationally.

## PUBLICATIONS

Mabaso, SM. (2023) Legacy Gold Mine Sites & Dumps in the Witwatersrand: Challenges and Required Action. Natural Resources, 14, 65-77. <https://doi.org/10.4236/nr.2023.145005>

Mabaso, SM. (2023). Social and Environmental Challenges caused by Legacy Gold Mining in Johannesburg: Government's Action Plan. eBook: ISBN: 978-81-19491-53-7. DOI: 10.9734/bpi/npgees/v9/10672F

Ramontja, T. and Mabaso, S. 2022. *Evolution of South Africa's Mining Regulatory Framework as it Relates to the Empowerment and Participation of Mining Communities*. [https://doi.org/10.1007/978-3-031-07048-8\\_6](https://doi.org/10.1007/978-3-031-07048-8_6)

## PROFESSIONAL AFFILIATIONS

- EAPASA: Environmental Assessment Practitioner (EAP) No 2022/4485
- International Association of Impact Assessment South Africa (IAIASa) No 7442
- Southern Institute of Mining and Metallurgy (SAIMM) No 709244
- Institute of Directors in South Africa (M.Inst.D)
- Land Rehabilitation Society of Southern Africa (LaRSSA)
- International Society for Development and Sustainability (ISDS)

## COMMITTEES

- South African Mineral Reporting Codes (SAMCODES) Standards Committee, 2016 to 2021
- SAMCODES-ESG Subcommittee – 2021 to date

## EXPERIENCE

01 MAY 2021 – DATE

**FOUNDER AND CEO: VAHLENGWE MINING ADVISORY AND CONSULTING**

### CORE SERVICES

- MPRDA and NEMA
- Mining Charter
- Environmental, Social and Governance - ESG
- Mine Closure and Rehabilitation
- Waste Management
- Carbon Tax Reporting
- Compliance Inspections
- Assistance to junior and small-scale miners

01 AUGUST 2014 – 30 APRIL 2021

**REGIONAL MANAGER, DEPARTMENT OF MINERAL RESOURCES AND ENERGY**

**(NORTHERN CAPE –AUGUST 2014 TO APRIL 2017 AND GAUTENG – MAY 2017 TO APRIL 2021)**

- Effective implementation and administration of the MPRDA
- Implementation and administration of Environmental Management policies and regulations in terms of NEMA and NEM: Waste Act
- Implementation and administration of Social and Labour Plans in terms of MPRDA
- Evaluation of Mining and Prospecting Work Programs and monitoring compliance
- Management of Land Use in mining areas to promote development and coexistence.
- Management of community development through implementation of the Mining Charter
- Promoting participation of Historically Disadvantaged South Africans in the mining economy and the value chain
- Management of relations and conflict resolutions between mining communities and mining companies
- Management of Financial and Administrative systems and procedures in the Regional Office
- Provide support and advisory to the Deputy Director General in the department

**01 APRIL 2007 – 31 JULY 2014**

**DEPUTY DIRECTOR: MINE ECONOMICS, DEPARTMENT OF MINERAL RESOURCES**

- Adjudication of mineral rights applications and manage sustainability of mining operations in line with the Mining/Prospecting Work programs.
- Monitor compliance through inspections and issuing of compliance directives.
- Assisting junior coal miners to access export markets through the Quattro Task team.
- Assist new entrants and junior miners in the mining industry.
- Conduct asset and mineral valuations for tax purposes and Section 11 applications

**01 DECEMBER 2000 – 31 MARCH 2007**

**INSPECTOR OF MINES, DEPARTMENT OF MINERALS AND ENERGY**

- Monitor compliance with the Mine Health and Safety Act in the mines.
- Provide technical advice on conflict between land development and mining operations.

**25 JANUARY 2000 – 30 NOVEMBER 2000**

**MINE SURVEYOR, TAVISTOCK COLLIERIES**

**05 AUGUST 1994 – 31 DECEMBER 2000**

**LEARNER OFFICIAL AND BURSAR, TAVISTOCK COLLIERIES**

## **EDUCATION**

**FEBRUARY 2018 TO JULY 2021**

**MASTER OF BUSINESS ADMINISTRATION, MILPARK BUSINESS SCHOOL**

- Advanced Business Research Methodology
- Business Ethics and Corporate Governance
- Business in Emerging Markets
- Business Report Writing, Quantitative Analysis and Presentation Skills
- Dissertation
- General Management Environment

- Global Trade (Macro-economic – BRICS – Developing Markets)
- Integrated Business Strategy
- Leadership and Change Management
- Management Accounting and Finance (part 1)
- Management Accounting and Finance (part 2)
- Marketing and Sales Management
- Operations and Technology Management
- People Management
- Social Responsibility and Environmental Management

#### **JUNE 2022 TO NOVEMBER 2022**

##### **CERTIFICATE: MINE CLOSURE AND LAND REHABILITATION, UNIVERSITY OF RETORIA (UP)**

- Closure Design
- Regional Planning considerations and operational mitigation
- Land preparation and soil management
- Land cover/surface stabilization-economic value
- Maintenance and land management systems
- Identifying closure planning challenges and problem areas
- Mine closure planning consideration
- Closure document required Baseline environment and closure risks
- Closure success criteria and rehabilitation monitoring
- Financial provisioning and social planning

#### **OCTOBER 2021 TO DECEMBER 2021**

##### **CERTIFICATE: ENERGY EFFICIENCY AND SUSTAINABILITY, UNIVERSITY OF CAPE TOWN (UCT)**

- Energy -importance, Strategy and Challenges
- Energy Metrics, Economics and Efficiency
- Energy-efficient and Sustainable Buildings
- Energy-efficiency management and technologies in buildings
- Energy-efficiency management and technologies in industrial sector
- Energy auditing
- Energy measurement verification and management systems

#### **MARCH 2021 TO JULY 2021**

##### **POST GRADUATE CERTIFICATE: CLIMATE CHANGE AND ENERGY LAW, UNIVERSITY OF WITWATERSRAND**

- Climate Change and Energy
- Energy Law Concepts and Economics
- Theories of Energy and Climate Regulation
- Sources of Energy: Fossil Fuels
- Sources of Energy: Petroleum Sector
- Sources of Energy: Gas Sector
- The South African Electricity Supply Industry
- Climate Change Law and Policy Framework
- Energy, Climate Change & Just Transition
- Nuclear as a Source of Electricity

- Energy Efficiency and Demand Side Management
- Regulation of Energy Procurement

**OCTOBER 2014 TO JANUARY 2015**

**CERTIFICATE IN BASIC TRAINING FOR ENVIRONMENTAL MINERAL RESOURCE INSPECTORS,  
UNIVERSITY OF PRETORIA**

- Constitutional Background
- NEMA and MPRDA framework legislation
- Sustainable Development
- EIA process, Scoping reports, and review of EA applications and Integrated EAs
- WASTE Act
- The Air Quality Act
- The Environmental Conservation Act
- The National Water Act
- The Integrated Coastal Management Act
- The Biodiversity Act
- The Protected Areas Act
- Administrative Law
- Criminal Enforcement
- Special forms of Liability
- Powers of Environmental Mineral Resources Inspectors-EMRI
- Ethics, Health and Safety and relevant issues
- Sampling
- Inspections
- Investigations
- Appeals
- Exemptions and exceptional circumstances

**MARCH 2006 TO NOVEMBER 2008**

**GRADUATE DIPLOMA IN MINING ENGINEERING, UNIVERSITY OF WITWATERSRAND**

- Mineral Economics
- Mineral Policy and Investment
- Compliance and Reporting Rules in the Mining Industry
- Economic Geology of South African Coal
- Coal extraction and Exploitation
- Coal and the Environment

**JULY 1999 TO JULY 2000**

**NATIONAL HIGHER DIPLOMA, MINERAL RESOURCE MANAGEMENT, TECHNIKON  
WITWATERSRAND**

**JULY 1996 TO MAY 1999**

**NATIONAL DIPLOMA, MINE SURVEYING, TECHNIKON WITWATERSRAND**

## SKILLS

- In-depth understanding of the mining industry and its economic value chain
- In-depth understanding of the regulatory and compliance regime in the mining industry
- In-depth understanding of the value of mining in the South African and Global economy
- Good communication skills
- Conflict resolution
- Good decision making
- Ability to work under pressure.
- Time management
- Good Leadership and management

## PERSONAL INFORMATION

I'm a male South African Tsonga speaking citizen, born on 29 November 1976 in Bushbuckridge, Mpumalanga Province where I started my primary schooling at Mpikaniso Primary school in 1983 and matriculated at Orhovelani High School in 1993.

I'm currently married with four children and residing in Mulbarton, Johannesburg South since June 2017 after my transfer from the Kimberly as the Regional Manager of the Northern Cape to the Johannesburg office where I also served as Regional Manager for the Gauteng Region until 30 April 2021 upon resignation.

## COMMUNITY INVOLVEMENT AND PERSONAL HOBBIES

I'm currently involved in community development projects in Bushbuckridge through career guidance, cultural activities, and sport to guide the youth to focus on their vision and education goals as part of giving back to my community and assist the future generation. I have sponsored soccer kits, traditional dancing activities and motivational seminars in my village since 2009.

My personal hobbies include playing golf, watching, and following soccer, rugby, and other national sporting codes. Mentoring my kids through schoolwork and sport. I spend more time outside work with my family to groom my kids to become better citizens and leaders of the future generation.

## REFERENCES

Mr Mosa Mabuza  
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Council for Geoscience  
012 841 1911  
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**Environmental Assessment  
Practitioners Association  
of South Africa**



Registration No. 2022/4485

***Herewith certifies that***  
  
**Sunday Mishack Mabaso**  
  
***is registered as an***  
  
**Environmental Assessment Practitioner**

***Registered in accordance with the prescribed criteria of Regulation 15. (1)  
of the Section 24H Registration Authority Regulations  
(Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the  
National Environmental Management Act (NEMA), Act No. 107 of 1998, as  
amended).***

Effective: 01 March 2024

Expires: 28 February 2025

Chairperson

Registrar





# CURRICULUM VITAE

NAME : Brunella Khanyile Mgiba-Mutero  
DATE OF BIRTH : 07 June 1995  
PROFESSION/ SPECIALISATION : Environnemental Consultant (Trainée)  
: SACNASP Student (169444)  
NATIONALITY : South African  
EXPERIENCE : 2 years  
LANGUAGES : English, Xitsonga

## KEY QUALIFICATIONS

I hold a Higher Certificate in Life and Environmental Science from University of South Africa and currently enrolled for Bachelor of Arts in Environmental Management with the University of South Africa.

## EXPERIENCE

[Environmental Consultant (Trainee)] [Vahlegwe Mining Advisory and Consulting]  
Duties Include:

- Conduct the Environmental Impact Assessment (BAR and S&EIR) and Environmental Management Plan/Programme for prospecting, mining rights and mining permits.
- Collect application for Water Use License Applications.
- Conduct mining and environmental compliance audits and write reports thereon.
- Write the annual reports for the projects.
- To maintain a proper filing system
- To give regular updates to clients on the progress of the work being carried out on the projects.

## PROJECTS EXPERIENCE

**Gomeza Trading (Pty) Ltd.** NC 30/5/1/1/2/ 13760 PR

Prospecting Right Application of Tin Ore, Nickel Ore, zinc Ore, Lithium Ore, Cobalt Ore and Lead in respect of the Farm Severn No.36 in the Administrative District of Kuruman, Northern Cape Province.

**Khutso Naketsi Communal Property Association (CPA).** NW 30/5/51/1/2/14411 PR

Prospecting Right Application of gold ore within the Magisterial district of Brits in the North-West Province.

**ATNM (Pty) Ltd.** GP 30/5/1/3/2/10393 MP

Application for Mine Closure Certificate for a gold ore mining permit issued in the Magisterial district of Benoni, Gauteng Province.

**Barzani Mining (Pty) Ltd.** NW 30/5/1/3/2/10778 MP

Application for Mine Closure Certificate for chrome ore mining permit issued in the Magisterial district of Mankwe, North-west Province.

# CURRICULUM VITAE

## ACHIEVEMENTS

- Ensure compliance monitoring and Enforcement of South African Environmental Legislations.
- Good understanding of Mineral and Petroleum Resources Development Act, National Environmental Management Act and Strategic Environmental Management Acts
- Good understanding of Environmental Impact Assessment, Waste Management and Air Quality Regulations.
- The implementation of Section 24G read with S24F and 7 of NEMA (Amendment) (Act No 8 of 2004) and Section 24G read with S24F and 12(3) of NEMA (Amendments) (Act 62 of 2008)

## EDUCATION

Institution	:	University of South Africa
Qualification	:	Bachelor of Arts in Environmental Management
Status	:	In-Progress

Institution	:	University of South Africa
Qualification	:	Higher Certificate in Life and Environmental Science
Status	:	Completed

## REFERENCES

Cecil Dau  
Senior Consultant (Vahlengwe Mining Advisory and Consulting)  
076 267 0743

## **APPENDIX B: Closure application form (P)**

**DEPARTMENT: MINERALS AND ENERGY**  
SOUTH AFRICA

**APPLICATION FOR CLOSURE CERTIFICATE**

[in terms of sections 43(3) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)]

**Note:**

The application is to be made within 180 days of lapsing, abandonment, cancellation, cessation, relinquishment or rehabilitation completed in terms of the closure plan as contemplated in section 43(3) of the Act.

**REGIONAL MANAGER/DESIGNATED AGENCY**

**REGION**

N O R T H - W E S T

1 Number of permission, permit or right

N W 3 0 / 5 / 1 / 3 / 2 / 1 0 7 7 8 M P

2 Name of applicant

B A R Z A N I M I N I N G ( P T Y ) L T D

3 Type of permission, permit or right in terms of the Act

Reconnaissance permission

☐

Reconnaissance permit

☐

Prospecting right

☐

Exploration right

☐

Mining right

☐

Production right

☐

Mining Permit

☒

4 Type of mineral or minerals:

C H R O M E O R E

5 Over the following land or area or offshore licence block:

P	O	R	T	I	O	N	O	F	P	O	R	T	I	O	N	3
O	F	T	H	E	F	A	R	M	T	W	E	E	L	A	A	G
T	E	1	7	5	J	P										

(attached a plan of land, area or offshore licence blocks applied for, if necessary)

6 Reason for application:

Lapsing	<input type="checkbox"/>	Cessation	<input type="checkbox"/>
Abandonment	<input type="checkbox"/>	Relinquishment	<input type="checkbox"/>
Cancellation	<input type="checkbox"/>	Rehabilitation	<input type="checkbox"/>
			<input type="checkbox"/>

7 Details of the relevant land, area or operation or offshore licence block pertaining to the application for closure

PORTION OF PORTION 3 OF THE FARM TWEELAAGTE
175 JP

8 Application for the transfer of environmental liabilities and responsibilities.  
If relevant, a separate submission must be appended to the application.

9 The following documents must accompany the application:

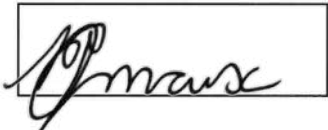
A closure plan contemplated in regulation 62. [Refer to Section 7 of the Closure Plan Report](#)

A final performance assessment on the environment management programme or environmental management plan, as the case may be. [Refer to Section 8.2.4 of the Closure Plan Report](#)

An application form of Form O contained in Annexure II, to transfer environmental liabilities and responsibilities to a competent person, if applicable. [Not Applicable](#)

A copy of an environmental risk report contemplated in regulation 60. [Refer to Section 8.2.5 of the Closure Plan Report and Appendix D of the Basic Assessment Report](#)

SIGNED AT	CENTURION																
ON THE	05 December	DAY	OF	2	0	24											



SIGNATURE OF THE APPLICANT

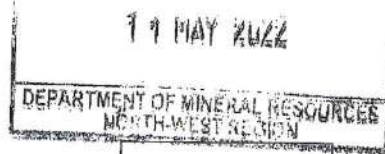
## **APPENDIX C: Mining Permit and regulation 2(2) map**



## mineral resources

Department:  
Mineral Resources  
REPUBLIC OF SOUTH AFRICA

DMR 59



Official  
Office Stamp

### MINING PERMIT

[Issued in terms of section 27 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)]

Permit No. 23/2022 Region NORTH WEST  
Office reference NW 30/5/1/3/2/10778 MP

Permission is hereby granted under and subject to the provisions of the Mineral and Petroleum Resources Development Act,

2002 to [full name] BARZANI MINING (PTY) LTD

Identity number in case of a natural person

In the case of a person other than a natural person please indicate:

Co ☒ Cc ☐ Partnership/Joint venture ☐ Other \* ☐

\* If other, specify

Registration number of Co. or Cc. 2 0 1 9 1 1 9 9 7 6 3 / 0 7

To mine for [name of mineral] CHROME ORE

On [full name of farm and subdivision, registration division and no.] CERTAIN PORTION OF PORTION 3 OF THE FARM TWEELAAGTE 175 JP

MAGISTERIAL DISTRICT OF MANKWE

as indicated on the attached plan No. 23/2022 signed by the Regional Manager on 1 1 0 5 2 0 2 2

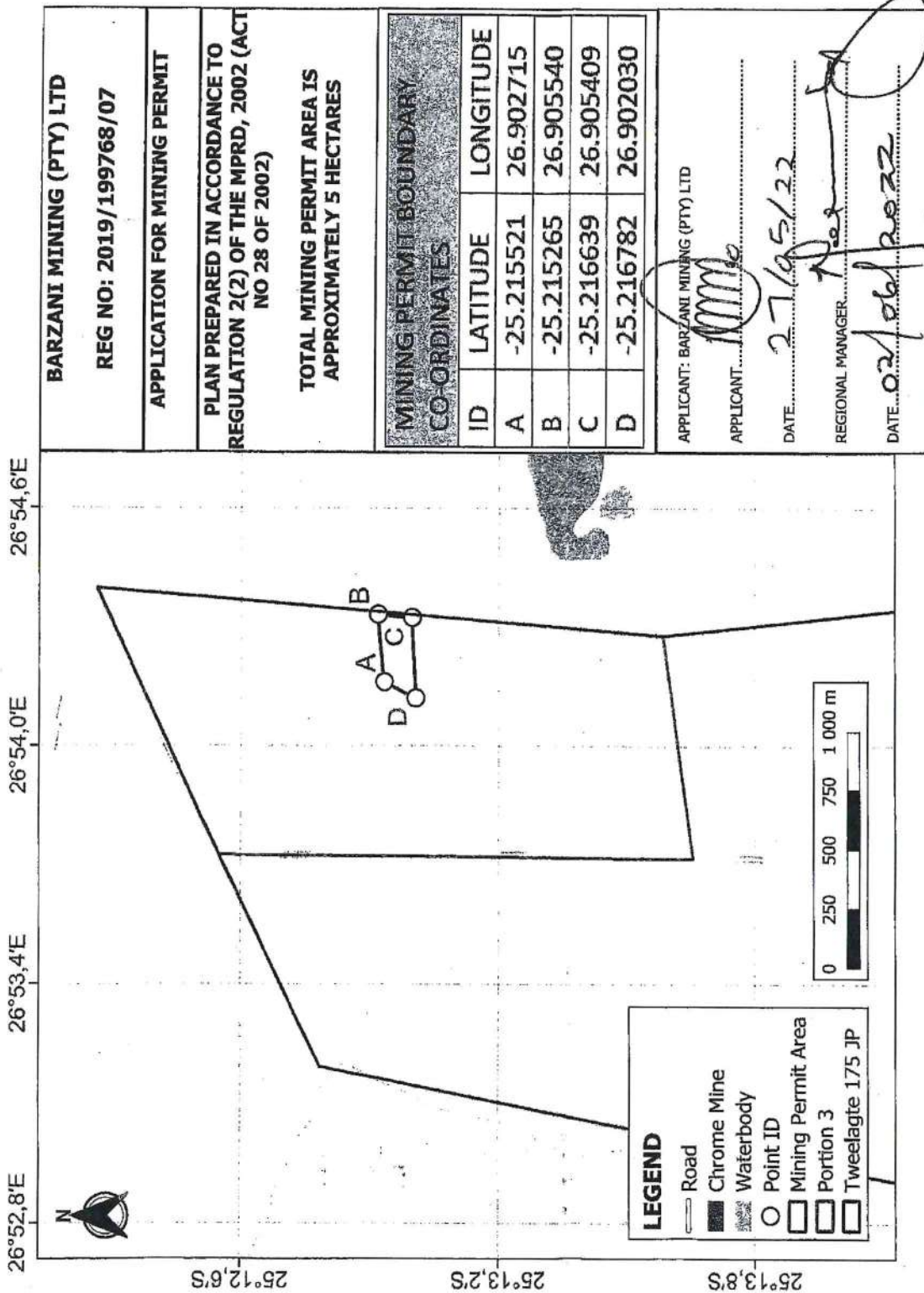
Unless this permit is suspended, cancelled, abandoned or lapses, it shall be valid for a period (not more than two years) which shall extend from the date of issuing to 1 0 0 5 2 0 2 4 and may be renewed for three periods each which may not exceed one year.

This permit does not exempt the holder from the requirements of any provision of any other law or from any restrictive provisions or conditions contained in the title deed of the land concerned, nor does it encroach upon the rights of any person who may have an interest in the land concerned.

Signed at KLERKSDORP this 11<sup>TH</sup> day of MAY 2022

7   
MINISTER OF MINERAL RESOURCES





THE FIGURE NUMBERED A - D REPRESENTS A MINING PERMIT AREA OF ABOUT 5 HECTARES COMPRISING PORTION 3 OF THE FARM TWEELAGTE 175 JP IN MOSES KOTANE LOCAL MUNICIPALITY WITHIN BOJANALA PLATINUM DISTRICT MUNICIPALITY, IN THE NORTH WEST PROVINCE FOR WHICH BARZANI MINING (PTY) LTD REG NO: 2019/199768/07 HAS APPLIED FOR A MINING PERMIT IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT 2002 (ACT 28 OF 2002)

## **APPENDIX D: Financial guarentee**



20211110

# Business Integrator Online

To whom it may concern

This serves to confirm that the following payment was made through Business Integrator Online:

Payment made by:	<b>BARZANI DEVELOPMENT (PTY) LTD</b>
Amount:	<b>R 220505.00</b>
Transaction Date:	<b>20211110</b>
Payment made to:	<b>DMR REHABILITATION TRUST NW</b>
Beneficiary Bank Name:	<b>ABSA BANK LIMITED</b>
Beneficiary Account Number:	<b>4067034416</b>
Beneficiary Branch Code:	<b>632005</b>
Description on Beneficiary Statement:	<b>NW/30/1/3/3/10778MP</b>
Trace reference number:	<b>29846001812020211110</b>
Additional comments by payer:	

Details of this payment may be confirmed by contacting the Transactional Banking Contact Centre during office hours on 0860 227 232

## Absa Business Bank - Transactional Banking

3rd Floor. Absa Towers West, 15 Troye Street Johannesburg 2001, P.O Box 7735 Johannesburg 2000  
Telephone Contact Centre 0860 227 232

### Office Hours:

07:30 to 17:00 Monday to Friday and 07:30 to 10:30 on Saturdays  
absaeb@absa.co.za  
Swift - Address: ABSA ZA JJ

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