

December 2024 REPORT ON THG REHABILITATION LIABILITY DETERMINATION PER INDIVIDUAL MINING RIGHT HELD BY THG IN THE DE PUNT-WESKUS AREA

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1 Mining Right Descriptions

DMR references to surf zone and marine concessions held by Transhex Group in De Punt-Weskus area are as follows:

Area Description	Original Ref. No.	Renewal Ref. No.
Surf Zone MRA/Concession		
13a - Farm 423 and Surf Zone	WC 047 MR	WC 10134 MR
12a - Strykloof	WC 317 MR	WC 10137 MR
13a - Strandfontein/Papendorp	WC 316 MR	WC 10136 MR
13a - Hollebaksfontein	WC 318 MR	WC 10135 MR
12a - De Punt	WC 314 MR	WC 10133 MR
12a - Bethel	WC 315 MR	WC 10132 MR
11a - 12a Weskus 152/3	WC 319 MR	WC 10138 MR
Marine Concession		
11a	WC 112 MR	WC 10066 MR
12a	WC 321 MR	WC 10130 MR
13a	WC 320 MR	WC 10131 MR

2 Background

As in the previous Rehabilitation Liability Determination, this report to meet DMR WC instructions to THG is structured with individual liability determinations per Mining Right (Surf Zones and Marine Concessions see Figure 1 overleaf). Accordingly, again, THG now appointed Site Plan Consulting (SPC) relying on their experience in Liability Determination Report preparation notably for De Punt/Weskus since the most recent 2023 Quantum measurement and calculation from which the detail measurements and calculations again form the basis of this 2024 Quantum measurement and calculation and allocation to the various Mining Right Areas.

3 Approach to Liability Determination

As in earlier reporting, the quantum calculation of these beach area Concessions is directly complicated by the fact that aerial imagery often precedes the mining disturbance or supersedes the site visit observations of mining disturbance by a number of high surf conditions. The latter case reduces the observed impact of the disturbance at the time of assessment. This factor of timing of aerial photography can only be rationalized by considering the nature of impact at the time when it occurs to reflect the disturbance by mining and not be measured at any later date. As seen from countless cases of mining on the beaches, rehabilitation of beach mining disturbances within the tidal wave zone are extensively and rapidly rehabilitated naturally by wave action within a few months of spring tides occurring at times of high wave action.

Determining the Quantum for these beach mining activities requires a random combination of the following perspectives on the disturbance and rehabilitation cycle:

- (i) Definition of the locality of the mining (specific beach)
- (ii) The understanding of the nature of the intertidal beach zone in terms of its:
 - Length of beach (the shorter cove type steeper beaches) require more complex and more costly rehabilitation.
 - The width of the beach and its beach profile, i.e. with flat intertidal wave zone presenting the best wave-action rehabilitation at lowest cost.

- (iii) Presence or absence of dry beach between high-water mark and the dune/cliff edge. Accordingly the Mine Plan for such beach mining prescribes a 5-10m wide setback of the beach mining from the toe of any adjacent back-of-beach cliff or raised dune structure. High rehabilitation costs result from the absence of sufficient dry beach setback being retained, and the wave action resultantly undercutting the coastal sand cliff, causing slumping thereof as had occurred and was recorded in the 2022 Quantum Update, where a large slump failure, due to undercutting, had occurred and was illustrated in the 2022 De Punt/Weskus Quantum update illustrated in Photo 1 of the 2022 report where costly rehabilitation of such slump has been required.

Within the above perspective, the range and number of disturbances to be assessed and costed is better deduced from more than a single date of photography with the best option being to base disturbance measurement on a set of chosen drone image records and consideration of such images in terms of:

- a selection of examples (types) of the various beach mining disturbances with consideration of the period between disturbance and observation and such period's reduction of disturbance by high wave action,
- their rehabilitation quantification; and then
- the summation of each of the examples, which are most likely to form the year's mining disturbance, i.e. the Quantum for the year.

While the 2022 Quantum Update had envisaged basing the later updates on such multiple drone imagery, the rapid decline in mining activities has eliminated introducing this improved system in the 2023 and this 2024 Quantum Update.



Figure 1: Locality Plan, showing Concessions



Figure 1: Locality Plan showing Concession areas

This December 2024 Annual Quantum update is based on:

- a) Reassessment of the imagery and measurements used in the 2022 and 2023 and comparison of that with more recent photography (March 2024):
 - i. No particular disturbance is ascribed to THG activities at present
 - ii. Only three beaches where remnant minor disturbances can still be ascribed to earlier THG mining of these long low-gradient beaches which will continue to completely rehabilitate under spring-tide surf conditions.
 - iii. Completion of reshaping the slumping of the earlier cliffed dune face as seen in Photo 1 below where reduction of beach elevation had allowed storm surf to undercut the high dune face, largely ascribed to earlier deep MSR sand removal/reducing of the beach elevation and much less to THG mining which only conducted on-beach screening and accordingly the reshaping of the slumped dune face was not included herein as a THG liability.



Photos 1: Shows the extensive remodelling of the slumped NW corner of the operation largely related to the actions of MSR while the SE corner of the photos show the final phase of THG mining operations on the site at the time of photography.

- (v) The above photos furthermore generally shows the necessary distinction to be drawn between disturbances ascribed to MSR mining and that ascribed to THG. While

emphasising that the ore deposits of heavy minerals mined by MSR and diamonds mined by THG occur as ore bodies overlying each other requiring on site management of the two different mining operations. The extent of the rehabilitation by terracing the slump material is clearly evident in Photo 1 above, totally overshadowing the disturbances by THG, which were largely undertaken in the central beach area and the surf zone where high wave action subsequently largely reshaped/rehabilitated such portion of the beach.

Within the context of the annual Quantum updates of 2018, 2019, 2020, 2021, 2022 and 2023 as well as the observations described above from the aerial images reviewed over that period, SPC has based the costing on the comprehensive assessment of the November 2022 and November 2023 Quantum update on the combination of the following defined disturbances, which we believe best represent the total of:

- (i) The road rehabilitation ascribed to THG operations (Refer Paragraph B1 – Roads hereafter).
- (ii) Outstanding rehabilitation of old disturbances, notably in the Strandfontein/Doring baai section as previously costed but not fully rehabilitated in 2022
- (iii) Beach Mining
 - a) observed indications of mining during passing visits in 2022 until early 2024;
 - b) probable/possible mining occurrences during late 2023 and their residual post-surf zone natural rehabilitation within 3 months after disturbance.
- (iv) rehabilitation consideration of the De Punt Town built structures THG Office, Plant and workshop complex and infrastructure. Since the 2020 costing, with the increase in visitor/recreational interest in the area, decision has been taken to retain the town post-mining and accordingly a significant reduction of the rehabilitation cost was contained in the 2022 Quantum Update, as was reflected in its Paragraph B4.2 and Table 5 therein.
- (v) the allocation of provisional sums of R50,000 per Marine Concession

4 December 2024 Quantum Calculations

This December 2024 Quantum Calculation is based directly on the 2022/2023 comprehensive costing system which had been structured on the basis of the 2018 all-inclusive report, on the following 4 disturbance categories but per individual Right Concession Areas:

- 1 **Roads**
- 2 **Outstanding Miscellaneous pre 2018 disturbances still remaining in latest images, including trenches, box cuts, dumps, areas to be smoothed in categories of Smooth Dumped Areas (SDA), Smooth Moderate Area (SMA), Smooth Rough Areas (SRA) and Smooth areas only requiring scarification only requiring revegetation** excluding roads and areas of disturbances by other parties and disturbances which have revegetated beyond a level of interference by applying an “in/out” attribute to each individual disturbance in the GIS .shp data capture and transferred to the Excel calculation tables (tables as developed in the 2018 Report and revisited in the 2022 assessment).
- 3 **Beach Mining**
- 4 **Built structures for THG Office, Plant, Workshop, and Residential area of “De Punt Town”**
- 5 **The standard Provisional Sum of R50 000 per Marine Concession** (as no meaningful impact assessment can be done on the low activity in these areas).

4.1 Roads

4.1.1 Informants to measurement and costing of Roads

As in the 2023 costing, in light of the distinct difference in public accessibility and history of THG involvement between the areas north and south of the Olifants River mouth, a distinction is drawn in the costing of roads and disturbance areas between the northern and southern sectors.

During the May 2012 Quantum costing THG/SPC had captured in GIS, the lengths of all road sectors (including the very smallest high-water access tracks) together with recordal of the shapefile attributes of each sector inclusive of width category 2m, 3m, and 5m. In the subsequent 2018 detail update of the 2012 GIS records, road sector recordal was found to still serve as the GIS base with minor road sector additions (See illustration below which is an extract from the GIS recordal of roads and tracks with each sector of the road or track having been captured and costed separately under road rehabilitation liability). Aerial imagery of various subsequent dates has again in December 2024 (of March 2024 imagery), confirmed negligible additions/changes to roads and tracks, and accordingly costing for this 2024 Quantum Update relies on an escalation of the previous update.



In the 2012 costing, in the absence of detail attributes on elements such as revegetation status and user groups of the various roads, required that assumptions on a percentage basis were made on the matters of:

- i. Length requiring side/mitre drains; and
- ii. Use by other user groups including Kelp harvesters, fisherman/divers and tourists/4x4 enthusiasts,

to determine costing.

Over the 6 years (2012 – 2018) the following new considerations informed the 2018 update and remain applicable in the 2024 Quantum Update given the sound basis on which they were developed:

- The levels of natural revegetation of closed tracks to date noted in site visits and revealed in recent aerial imagery reflecting the gradual success of dune track rehabilitation by natural revegetation following road entrance closure. It was noted in the image assessments and the numerous site visits that such natural revegetation while being extremely successful in softer soil conditions was poor in compacted road surfaces clearly indicating that lightly compacted roads and tracks identified for rehabilitation would be adequately dealt with through scarification and hand seeding to assist natural revegetation.
- Increased use of the main coastal road by the public and its upgrade by MSR together with MSR’s significant upgrade (use) of beach access ramp roads, the liability of which has been assumed by MSR, has enabled total exclusion of the main coastal road MSR sectors plus the north and south extremities considered as public roads and the large beach access ramp roads of MSR, mapped/developed since the 2018/2022 recordal.

4.1.2 Classification/exclusions in the December 2024 update

The September 2018 assessment and its report included a comprehensive classification of all roads and tracks, their rehabilitation requirements, their unit rate costing and exclusion of certain roads from THG liability. The 2023 report in its table under roads primarily allocated THG road liability per respective concession area and then calculated THG’s liability for 2, 3, and 5m road widths by task and cost per unit measurement.

Furthermore, given that certain disturbances and especially roads are shared with or are now the total responsibility of other users (MSR or the general public), in the costing of roads a further reduction of THG road rehabilitation responsibility is made for roads and tracks “used by other user groups” such as kelp harvesters, campers, fishermen and recreational divers on a percentage responsibility split for the area north of the Olifants River mouth (a reduction of 20% in the calculation table of roads).

Escalation of 3.2% was applied (3.1% CPIx increase from November 2023 to November 2024 plus 0.1% increase for the month of December 2024).

Group	Weight	Index (Dec 2021=100)			% change	
		Dec 2023	Nov 2024	Dec 2024	Dec 2024 vs. Nov 2024	Dec 2024 vs. Dec 2023
All items (CPI Headline)	100.00	112.7	116.0	116.1	0.1	3.0

Source: <https://www.statssa.gov.za/publications/P0141/P0141December2024.pdf>

4.2 Mining Disturbances

Site visits since 2018 revealed that such minor changes had occurred south of the Olifants River mouth and remedial treatment had been applied to the small excavations. As such the annual re-measurement is not justified (since the combination of Google Earth and drone images for the central sector). Accordingly, the detailed measurement for rehabilitation costing of disturbances generally in the zone between the coastal road and the cliff edge was costed using aerial image update of the 2012 GIS record and then refining the disturbance interpretation per disturbance from more recent Google Earth (and partly through 2018 drone images for the central sector) mainly regarding:

- the exclusions of disturbance areas which have revegetated beyond interference level,
- and others which have been smoothed in the interim
- and added new disturbances.

Accordingly, the Update merely relies on escalation.

4.2.1 Informants to measurement and costing of “Disturbances” i.e. surfaces disturbed between the coastal road and the seaward dune edge, captured in 2012 GIS and updated from aerial photography in 2018

Table 3 overleaf reflects the costing of disturbances which was based on GIS recordal from Google Earth of individual disturbance area, total perimeter, and an assumed depth for each excavation based on the Google Image (type of excavation), which have all remained largely unchanged since their measurement in 2018 and the recordal of 2012 GIS record, with escalation applied at 4.6% for 2019 – 2021 and 6% for 2022 and once more 6% for 2022 to 2023, and then again at 3.2% for the period Nov 203 to Dec 24..

4.2.2 Classification and exclusions in the 2018 update

Miscellaneous pre 2018 disturbances including trenches, box cuts, dumps, areas to be smoothed in categories of Smooth Dumped Areas (SDA), Smooth Moderate Area (SMA), Smooth Rough Areas (SRA) and Smooth areas only requiring scarification, excluding roads and areas of disturbances by other parties and disturbances which have revegetated beyond a level of interference by applying an “in/out” attribute to each individual disturbance in the GIS .shp data capture file and transferred to the Excel calculation tables .

It is noted that the earlier 11a-North sector data and costs were excluded in 2018 as they are determined to be the disturbance by others.

Extract from 2012 GIS capture of disturbance capture attributes (hectare and perimeter) and type, as per 2018. Accordingly, no post-2018 measurements are relevant and escalation is merely applied to the captured GIS disturbances which served the 2022 and now the 2024 Quantum Update.



Figure 2: Example of data capture in .shp file format in GIS

Table 3: Disturbance cost per Surf zone concession area at December 2024

Disturbance cost per surf zone concession area at November 2023

11a_North

Deleted from 2022 Quantum of THG

11a_12a_Weskus 152/3 (WC 319 EM)

Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
Total area (ha)	0.10	0.0	0.03	10	2.47	4.37	10.73	0.00	27.55
Total Perimeter (m)	217.85								
Rate (R/ha)			R112 799.56	R17 251.12	R63 697.87	R106 163.84	R15 261.28		
Cost			R3 892	R169 823	R157 531	R463 968	R163 682		
Rate (R/perimeter lin.m)	R37.62	R37.62							
Perimeter sloping cost (R)	R8 195.5	R0.0							
Excav. moves top 2 m of wall (m³)									
Excav. Rate (R/m³)									
Top of wall removal cost (R)									
Seeding of dozed trench and box cut perimeter 5m wide	0.11ha	0.00ha							
Hand seeding rate (R/ha)	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79		
Hand seeding cost	R549.3	R0.0	R174.0	R49 642.2	R12 471.3	R22 038.5	R54 085.4		
Subtotal Cost per category *	R 8 744.78	R 0.00	R 4 065.56	R 219 465.69	R 170 002.52	R 486 006.34	R 217 767.22		R 1 106 052.12

12a_Bethel (WC 315 EM)

No cost for disturbances	0	0	0	0	0	0	0	0	0
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12a_Strykloof (WC 317 EM)

Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
Total area (ha)	0.00	0.0	0.00	0	0.00	0.00	0.21	0.00	0.21
Total Perimeter (m)	0								
Rate (R/ha)			R112 799.56	R17 251.12	R63 697.87	R106 163.84	R15 261.28		
Cost			R0	R0	R0	R0	R3 168		
Rate (R/perimeter lin.m)	R37.62	R37.62							
Perimeter sloping cost (R)	R0.0	R0.0							
Excav. moves top 2 m of wall (m³)									
Excav. Rate (R/m³)									
Top of wall removal cost (R)									
Seeding of dozed trench and box cut perimeter 5m wide	0.00ha	0.00ha							
Hand seeding rate (R/ha)	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79		
Hand seeding cost	R0.0	R0.0	R0.0	R0.0	R0.0	R0.0	R1 046.9		
Subtotal Cost per category *	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 4 215.12		R 4 215.12

12a_ De Punt (WC 314 EM)

Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
Total area (ha)	0	5.6554	0	0	0.5990	0	0	0.18	6.4344
Total Perimeter (m)	0	2056.3	0	0	0	0	0	0	
Rate (R/ha)			R112 799.56	R17 251.12	R63 697.87	R106 163.84	R15 261.28		
Cost			R0	R0	R38 155	R0	R0		
Rate (R/perimeter lin.m)	R37.62	R37.62							
Perimeter sloping cost (R)	R0.0	R77 357.8							
Excav. moves top 2 m of wall (m³)								3568	
Excav. Rate (R/m³)								10.35	
Top of wall removal cost (R)								R36 923.39	
Seeding of dozed trench and box cut perimeter 5m wide	0.00ha	1.03ha							
Hand seeding rate (R/ha)	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79		
Hand seeding cost	R0.0	R5 184.7	R0.0	R0.0	R3 020.6	R0.0	R0.0		
Subtotal Cost per category *	R 0.00	R 82 542.56	R 0.00	R 0.00	R 41 175.65	R 0.00	R 0.00	R 36 923.39	R 160 641.61

13a_ Strandfontein (WC 316 EM)

No cost for disturbances	0	0	0	0	0	0	0	0	0
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13a_Farm 423 (WC 47 EM)

Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
Total area (ha)	0.04	0.0	0.00	0	0.00	0.00	0.00	0.00	0.04
Total Perimeter (m)	93.96								
Rate (R/ha)			R112 799.56	R17 251.12	R63 697.87	R106 163.84	R15 261.28		
Cost			R0.00	R0.00	R0.00	R0.00	R0.00		
Rate (R/perimeter lin.m)	R37.62	R37.62							
Perimeter sloping cost (R)	R3 534.8	R0.0							
Excav. moves top 2 m of wall (m³)									
Excav. Rate (R/m³)									
Top of wall removal cost (R)									
Seeding of dozed trench and box cut perimeter 5m wide	0.05ha	0.00ha							
Hand seeding rate (R/ha)	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79		
Hand seeding cost	R236.9	R0.0	R0.0	R0.0	R0.0	R0.0	R0.0		
Subtotal Cost per category *	R 3 771.68	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 3 771.68

13a_Hollebaksfontein (WC 318 EM)

Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
Total area (ha)	0.03	0.8	0.49	0	3.26	0.00	0.00	0.00	4.61
Total Perimeter (m)	81.43	637.9							
Rate (R/ha)			R112 799.56	R17 251.12	R63 697.87	R106 163.84	R15 261.28		
Cost			R55 756.82	R0.00	R207 833.40	R0.00	R0.00		
Rate (R/perimeter lin.m)	R37.62	R37.62							
Perimeter sloping cost (R)	R3 063.4	R23 997.7							
Excav. moves top 2 m of wall (m³)									
Excav. Rate (R/m³)									
Top of wall removal cost (R)									
Seeding of dozed trench and box cut perimeter 5m wide	0.04ha	0.32ha							
Hand seeding rate (R/ha)	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79	R5 042.79		
Hand seeding cost	R205.3	R1 608.4	R2 492.7	R0.0	R16 453.6	R0.0	R0.0		
Subtotal Cost per category *	R 3 268.71	R 25 606.14	R 58 249.47	R 0.00	R 224 287.02	R 0.00	R 0.00	R 0.00	R 311 411.34
Total nett disturbances December 2024									1 586 091.86

Table 4: Summary of disturbances cost per surf zone concession area (Dec 2024)

Table date Dec 2024	Measurement	Trenches	Box Cut	Dumps	SDA	SMA	SRA	Smooth	De Punt FTP	Total
11a_North (WC.....EM)	Removed in 2022 Quantum									
11a_12a_Weskus 152/3 (WC 319 EM)	Subtotal Cost per category *	R 8 744.78	R 0.00	R 4 065.56	R 219 465.69	R 170 002.52	R 486 006.34	R 217 767.22	R 0.00	R 1 106 052.12
12a_Bethel (WC 315 EM)	No cost for disturbances	0	0	0	0	0	0	0	0	0
12a_Strykloof (WC 317 EM)	Subtotal Cost per category *	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 4 215.12	R 0.00	R 4 215.12
12a_De Punt (WC 314 EM)	Subtotal Cost per category *	R 0.00	R 82 542.56	R 0.00	R 0.00	R 41 175.65	R 0.00	R 0.00	R 36 923.39	R 160 641.61
Subtotal North of Olifants River		R 8 744.78	R 82 542.56	R 4 065.56	R 219 465.69	R 211 178.17	R 486 006.34	R 221 982.34	R 36 923.39	R 1 270 908.85
13a_Strandfontein (WC 316 EM)	No cost for disturbances	0	0	0	0	0	0	0	0	0
13a_Farm 423 (WC 47 EM)	Subtotal Cost per category *	R 3 771.68	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 0.00	R 3 771.68
13a_Hollebaksfontein (WC 318 EM)	Subtotal Cost per category *	R 3 268.71	R 25 606.14	R 58 249.47	R 0.00	R 224 287.02	R 0.00	R 0.00	R 0.00	R 311 411.34
Subtotal South of Olifants River		R 7 040.38	R 25 606.14	R 58 249.47	R 0.00	R 224 287.02	R 0.00	R 0.00	R 0.00	R 315 183.01
Total nett rehab cost (December 2024)									R 1 586 091.86	

5 THG Beach Mining

5.1 Approach to Beach Mining costing

Based on the analyses of beach disturbances in the THG “Beach mining” category in the costings conducted to date, the 2022, 2023 and now this 2024 costing distinguishes between the following four Beach Mining disturbance levels:

1. **Tidal Zone Mining of long beaches with low intertidal beach profile** where the intertidal zone is subject to regular and consistent reshaping during the mining with additional reshaping largely occurring by wave action during normal and spring high tides and especially under coinciding high wave activity. Rehabilitation costing is therefore nominal, provided that residual beach level is not significantly lowered (as occurs during MSR mining), and accordingly the back of beach mining setback (originally 5m but 10m suggested where high dune cliffs are involved) to the base of either the dune zone or the dune zone cliff has not been disturbed.
2. **Generally a shorter beach with a steeper beach profile** where mining may occur to various levels and often requiring temporary sand walled coffer dams which will allow the deeper excavation to bedrock by excavator or “walpompe” in the coffer pond. In order to reduce the reliance (time) of reshaping the beach profile by spring-tide concurrent with high wave action, reshaping of such beaches by a combination of excavator and dozer is costed.
3. **Unusually high disturbance of short beaches with steep profiles** where deep sand removal by THG or in combination with MSR is required, as costed in the 2018 Annual Quantum Update and in which both MSR and THG rehabilitation was required in the back-of-beach where inadequate provision for a barrier had resulted in the slumped dune face ascribed to MSR and required excavator and dozer intervention in reshaping as the disturbed area was beyond the limit of even the spring-tide reshaping. By comparison, the tidal zone rehabilitation was largely facilitated by initial bulk smoothing by excavator and dozer, and then the subsequent spring-tide wave action. As there is no current High Impact Short Beach Disturbance mining activity in the De Punt area which can be costed in this highest category of disturbance, the 2018 costing serves as the basis for any future costing of a similar occurrence. Refer to Paragraph 5.2 below for the costing provision for Beach Mining.
4. **Moderate deep-mined short steep beach** as a variation on the “Unusually High Disturbance Beach Mining” (above), this fourth costing for a less intensely disturbed steep beach, including deep beach mining and sand coffer dams by THG, but excluding MSR involvement and respecting the mining setback, we offer this fourth costing at 50% of that of the **Unusually high disturbance of short beaches with steep profiles**.

5.2 Costing provision for Beach Mining

For the 2024 Quantum Update, based on the perusal of aerial imagery, we identify that the Quantum should include provision for following in each of the categories:

1. **Tidal Zone Mining of long beaches with low intertidal beach profile**

Costing provides for the shaping by grader of the final 200m of disturbed beach, 40m wide. Measuring 8000m^2 @ $\text{R}3.48/\text{m}^2$ = nett cost for Item 1: $\text{R}27\,829$ to 11a-12a Weskus 152/3. (This cost is a 3.2% escalation applied to the 2023 calculation).

2. Generally a shorter beach with a steeper beach profile

Shaping entire beach assumed at 180m long x 40m wide = 7200m².

7200m² x R4.51/m² = R32 467, allocated to 12a – Strykloof in absence of any definite site. (This cost is a 3.2% escalation applied to the 2023 calculation).

3. Unusually high disturbance of short beaches with steep profiles

Based on the 2018 detailed costing of the “High” disturbance beach mined by a combination of MSR and THG, the 2018 costing in this “Highest” category for what we consider a “Highest” level yielded a 2021 nett cost of R90 695.37 allocated to 11a-12a Weskus 152/3. Rationalization: R90 695.37 x 40% = R36 278.15. The R36 278.15 was escalated to R38 454.84 in 2022 and further escalated by 6% to 2023 and 3.2% in 2024 to yield a Dec 2024 total of R42 066.

4. Moderate deep-mined short steep beach

At 50% of the cost of the “Category 3” disturbance, a nett cost of R26 291.57 is allocated to 12a-Bethel in absence of any definite site.

Rationalization: R45 347.68 x 50% = R22 673.84 (The R22 673.84 cost was escalated to R24 034.27 in 2022, further escalated by 6% to 2023 and finally escalated by 3.2% to Dec 2024).

NOTE: A rationalization of the above costing in terms of the fact that only one Category 3 “Unusually High” disturbance project has occurred to date, while no Category 4 “Moderate deep-mined short steep beach” has occurred, suggests that the 2024 Quantum need only provide for:

- (i) 40% chance i.e. 40% cost of the Category 3 “Unusually High” Beach mining disturbance, and
- (ii) 50% chance of the Category 4 “Moderate Deep-mine short steep Beach mining” disturbance be applied in the 2024 Quantum provision year.

6 Built structures: THG Office, Plant, Workshop & Residential area of De Punt

6.1 Methodology of built structure costing (refer table 5 overleaf)

The THG De Punt Built Structure costing was originally based the individual attributes of each structure which were recorded during previous site visit of the whole THG De Punt Complex. Such field recordal allowed classification of Built Structures into several classes according to the costing implications of each class as applied at LOR and WCR. The GIS data capture was done on the basis of established methodologies discussed with demolition contractors during each update of the unit rates for the demolition and costing of the various structure types (classes).

Costing included demolition of the structure, loading, hauling and tipping of demolition rubble excluding Asbestos in an existing trench with 3m soil cover, within 500m of the structures where overburden cover material exists in immediate proximity.

Asbestos management in demolition was then integrated as a specific item in respect of especially Big 6 roofs and Big 6 side cladding sheets. Asbestos quantification (m²) for roofs of individual structures (Big 6) was achieved by using area (m²) of individual .shp structure that had Asbestos roofs, while Asbestos (Big 6) side cladding (mostly in workshops and

enclosed parking structures) was calculated as an Asbestos factor recorded in site visit (ratio of side cladding area to roof area (m²) of individual .shp structure) thereby determining the side cladding face area in m². Having quantified Asbestos for each structure, an inclusive unit rate, being the contractor rate for demolition, transport and disposal at Vissershok waste disposal site was applied to obtain Asbestos cost for each structure.

Built structure rehabilitation costs were determined from measured Google Earth aerial imagery of the gutter line of each building or built structure and the unit rates as per Table 5 showing built summary cost per class.

6.2 Costing of Built Structures

As the methodology is described in 6.1 above, we additionally refer the reader to the element of retention of built structures requested by the landowner in the relevant portion of the introduction paragraph which deals upfront with the exclusions of built structures to be retained for the landowner’s post-mining use thereof, apart from the Plant building and Plant itself which will be demolished/removed.

The Plant building’s IBR steel clad building will be sold with no cost of the demolition to THG. Accordingly, only Asbestos removal and disposal costs are included in this 2024 Quantum update in respect of the Plant.

With respect to Built Structures of the “De Punt Town” which all occur at and near the De Punt Complex, Trans Hex Operation (Pty) Ltd as landowner of the farm (The Point 267 Remainder measuring 1774ha) has requested that most of the buildings be retained for their post-mining use given the role which such built structures can fulfil in the post-mining use of the land given its unique coastal and estuarine characteristics (views and access) with opportunity for tourism development on the Estuary and the coastline.

Accordingly, Table 5 below shows the 2018 costing for all buildings irrespective of retention but then to reflect the retention of the town as a post-mining “De Punt Tourist Town”, the second column clearly shows the zero value contribution to the 2024 Quantum Update Determination, excluding only a small value for the removal and disposal of Asbestos of the remaining Plant steel structure, costed at R9636.00 in Dec 2024.

Table 5 Nett Costing of built structures inclusive of Asbestos per class

Summary of costs of “not retained” buildings and structures per class in the De Punt Mining Area (excluding “retained” buildings i.e. Plant related steel structures to be removed)			
Class and Description	Nett Cost (R) 2018	Nett Cost (R)2023	Nett Cost (Dec 2024)
De Punt			
1 (brick buildings)	R 540 376	R0.00 (To be retained)	R0.00 (To be retained)
10 (Shacks)	R 5 774	R0.00 (To be retained)	R0.00 (To be retained)
2A.3B (Block buildings)	R 38 820	R0.00 (To be retained)	R0.00 (To be retained)
4ABD (Steel Workshops)	R0.00 will be retained	R0.00 (To be retained)	R0.00 (To be retained)
Class 4Hb: Plant steel clad or unclad	R7 261	R9 337	R9 636
Class SUMCon: Mass concrete	R10 080	R0.00 (To be retained)	R0.00 (To be retained)
Class RD: Reservoirs/ water infrastructure	R0.00 (To be retained)	R0.00 (To be retained)	R0.00 (To be retained)
Total nett cost: (includes Asbestos at R120/m² (2018))	R602 312 (2018)	R 8,808	R9 636

7 Marine Concessions

As no meaningful impact assessment can be done on the low activity in these areas, a R50 000 provisional sum per each of the three Marine Concessions is provided for.

8 Determination of Rehabilitation Fund Provision

Refer Tables 6 and 7 overleaf

Table 6: Summary of all nett costs per Surf Zone and Marine Concessions/Mining Rights

DMR ref	Surf Zone MRA/Concession	Disturbances Costs	Roads	Beach Mining	Buildings	Total nett cost per Surf Zone Mining Right
WC (319) EM	11a-12a Weskus 152/3	R 1 106 052.12	R 289 631.27	R 69 895.00	R 0.00	R 1 465 578.39
WC (315) EM	12a- Bethel	R 0.00	R 67 039.54	R 26 297.57	R 0.00	R 93 337.11
WC (317) EM	12a- Strykloof	R 4 215.12	R 79 577.82	R 32 467.00	R 0.00	R 116 259.94
WC (314) EM	12a- De Punt	R 160 641.61	R 137 389.09	R 0.00	R 9 636.00	R 307 666.70
WC (316) EM	13a-Strandfontein/Papendorp	R 0.00	R 100 309.56	R 0.00	R 0.00	R 100 309.56
WC (47) EM	13a- Farm 423	R 3 771.68	R 8 866.94	R 0.00	R 0.00	R 12 638.62
WC (318) EM	13a- Hollebaksfontein	R 311 411.34	R 32 089.86	R 0.00	R 0.00	R 343 501.19

DMR Ref	Marine Concession	Provisional sum
WC (112) EM	11a	R50 000.00
WC (321) EM	12a	R50 000.00
WC (320) EM	13a	R50 000.00
Subtotal marine concessions		R150 000.00

Table 7: Determination of current rehabilitation liability (Dec 2024 Quantum value)

DMR ref	MRA/Concession	Nett cost totals	Fixed costs			Total NETT Plus fixed costs Excl. VAT	VAT (15%)	Total rehab cost Incl. VAT per concession
			Management (2.5%)	Contingencies (15%)	Ps &Gs (6%)			
WC (319) EM	11a-12a Weskus 152/3	R 1 465 578.39	R 36 639.46	R 219 836.76	R 87 934.70	R 1 809 989.31	R 271 498.40	R 2 081 487.71
WC (315) EM	12a- Bethel	R 93 337.11	R 2 333.43	R 14 000.57	R 5 600.23	R 115 271.34	R 17 290.70	R 132 562.04
WC (317) EM	12a- Strykloof	R 116 259.94	R 2 906.50	R 17 438.99	R 6 975.60	R 143 581.03	R 21 537.15	R 165 118.18
WC (314) EM	12a- De Punt	R 307 666.70	R 7 691.67	R 46 150.01	R 18 460.00	R 379 968.37	R 56 995.26	R 436 963.63
WC (316) EM	13a- Strandfontein/Papendorp	R 100 309.56	R 2 507.74	R 15 046.43	R 6 018.57	R 123 882.30	R 18 582.35	R 142 464.65
WC (47) EM	13a- Farm 423	R 12 638.62	R 315.97	R 1 895.79	R 758.32	R 15 608.69	R 2 341.30	R 17 949.99
WC (318) EM	13a- Hollebaksfontein	R 343 501.19	R 8 587.53	R 51 525.18	R 20 610.07	R 424 223.97	R 63 633.60	R 487 857.57
DMR Ref	Marine Concession	Nett cost totals						
WC (112) EM	11a	R 50 000.00	R 1 250.00	R 7 500.00	R 3 000.00	R 61 750.00	R 9 262.50	R 71 012.50
WC (321) EM	12a	R 50 000.00	R 1 250.00	R 7 500.00	R 3 000.00	R 61 750.00	R 9 262.50	R 71 012.50
WC (320) EM	13a	R 50 000.00	R 1 250.00	R 7 500.00	R 3 000.00	R 61 750.00	R 9 262.50	R 71 012.50
Dec 2024 Total liability of THG at De Punt and West Coast concessions								R 3 677 441.27

8.1 Allocation of liability in area “11a North:

It is noted that this “11a North” portion, has no allocated concession nor DMR reference number as it lies north of the 11a-12a Weskus surf zone concession, and has consequently been excluded from this 2022 Quantum Update.

9 CV and Declaration of Report Compiler

Name: CRAIG DONALD
Date of Birth: 26 February 1967
Parent Firm: Site Plan Consulting
Position in Firm: Member (100%)
Years with the Firm: Since 2004 as member
Nationality: South African
Professional Registration: EAPASA (Reg #: 2020/2124)

Qualifications:

Year	Qualification	Institution
1984	Senior Certificate Matriculation	Plumstead High School
1992	National Higher Diploma: Town & Regional Planning (<i>cum Laude</i>)	Cape Technikon
1995	Minerals and Metals Extraction short course	Continuing Engineering Education, University of Witwatersrand
1997	National Diploma: Surface Mine Management	Technikon SA
1999	Principles for Environmental Management short course	Environmental Evaluation Unit of University of Cape Town
2003	Masters of Business Administration	University of Cape Town

Languages: English (first language)
Afrikaans (second language)

Employment History & Key Qualifications:

1989 -2004: Settlement Planning Services
2004 till present: Site Plan Consulting CC

I was initially employed by Settlement Planning Services (a Town Planning Consultancy) as a technician during my Higher Diploma in Town and Regional Planning as part of my experiential training. Under the mentorship of Stephen van der Westhuizen my main involvement was the compilation of Environmental Management Programmes (mainly in surface mining related field) and geographic information systems. There was little guidance and no templates for the compilation of the EMPs and between Mr van der Westhuizen and myself, we developed a document structure acceptable to the then Department of Minerals.

In order to obtain a deeper understanding of the relevant mining issues, I completed a Surface Mine Management course as well as short courses such as Mineral and Metal Extraction and the immersive Environmental Evaluation course run by the EEU of UCT. I completed a part-time MBA at UCT in 2003.

In 2004 I joined Mr van der Westhuizen’s Site Plan Consulting CC as a 50% member and since then have been serving mostly the Surface Mining industry in all environmental related matters as well other aspects in their licencing and legislated environmental requirements in maintaining said approvals.

Main tasks:

I have many years practical experience in diverse environmental, spatial and mine planning projects. In that time I have developed experience in use of Word, Excel, CorelDraw and ArcView GIS.

The main focus of work experience has been in the licencing, physical and environmental planning, monitoring and closure of surface mining operations. The mines have varied in:

- Size from small sand mines to the largest aggregate or diamond producers,
- Products from clay to diamonds,
- Location from the Alexander Bay to East London/KZN coastal areas as well as inland in Free State and Limpopo.
- Scale and type of environmental impact.

In respect of the licencing and physical planning of surface mines, the work entails *inter alia* the compilation of:

- Mining and Prospecting Work Programmes: a detailed mine / prospect plan and project description including cash flow forecast / budget to determine mine’s economic viability and cost of prospecting
- Social and Labour Plan: Legislated document required to describe how the mine will maximise its socio-economic impact through enforced education, training and corporate social responsibility programmes for the staff and surrounding community.

In respect of the environmental planning, the work has entailed the completion of Environmental Authorisation Application forms and the compilation of Basic Assessments, Scoping Reports, Environmental Impact Assessments, Environmental Management Plans and Programmes dependent on application requirements in accordance with either or both the Mineral and Petroleum Resources Development Act and the National Environmental Management Act (with the amalgamation of these 2 pieces of legislation in December 2014). These have all entailed full public participation and liaison with and full input from specialists as required.

In respect of monitoring the work involves conducting of environmental audits to measure the level of compliance of actual site conditions against the prescriptions of the EMP. The auditing task also serves to highlight any shortcomings in the EMP.

Closure of surface mining operations has entailed the conducting of all public participation and the lodging of all documentation required.

In addition, the work also entails annual updates of Rehabilitation Quantum calculations for almost all of the approved Mining Rights in the list below. These calculations are conducted using both the Guideline of the DMRE and as Itemised costs in certain relevant operations. In addition to the list below, we have been calculated the rehabilitation quantum for Alexkor and De Beers (now Transhex) operations on the West Coast as well as Lower Orange River operations of Transhex (now LOR-D/Plateaux Diamonds).

The following lists represent the projects wherein I have been the lead EAP. I have been involved in other projects as an assistant to the lead EAP. Note that although I (and Site Plan Consulting) have always adhered to the principles of NEMA in the EIA process, the amalgamation of the Minerals and Petroleum Resources Development Act and National Environmental Management Act as the "One Environmental System" only came into effect in December 2014. The projects I have conducted under that system have been listed separately under the relevant project experience which follows.

Relevant Project Experience:

Prospecting Rights (including public participation and compilation of EMPlans (inclusive of EIAs)):

- For Salt on Papendorp Pan as community initiative supported by Cawood Salt (Pty) Ltd
- EMPs only for 7 Heavy Mineral Prospects of the West Coast (Basileus Group)
- Firlands (Gordons Bay) for aggregate - Afrimat
- Zoet and Zuur Diamond pipe (Boshof, Free State)
- Several Alluvial Diamond prospects on West Coast and inland West Coast (Western and Northern Cape) – Surfzone (Pty) Ltd, et al.
- Phosphate prospect (Saldanha) –Gecko Fert (Pty) Ltd
- Aggregate prospect near Oyster Bay in Eastern Cape – Denron Group
- Cobalt, Copper, Molybdenum, Nickel, Lead, Zinc, Silver, Gold & Platinum Group Minerals on 13 farms in the Kenhardt Magisterial District – Lehumo Resources (Pty) Ltd
- Nickel and related minerals on 8 farms near Kliprand – Hondekloof Nickel (Pty) Ltd
- Kaolin at Langklip (near Saldanha) – Seeland Development Trust on behalf of local community.
- Base minerals around Oena Mine in Northern Cape – African Star Resources (Pty) Ltd
- 6 sites for Uranium in the Karoo (Tasmin Pacific Minerals Ltd)
- Nickel prospect at Oup near Pofadder – Lehumo Resources (Pty) Ltd
- Commissioners Pan Salt Prospect – Dwaggas Soutwerke (Pty) Ltd
- Gypsum prospects near Kimberley, Vanrhysdorp and in the Bushmanland (St Gobain Group)
- Sand sources for Atlantis Foundries (Western Cape) – ZLLD Sand Mining (Pty) Ltd
- Prospect 1006 – Afrimat – Western Cape
- Nickel and related Minerals – Hondekloof / Kliprand area – BME 100 ((Pty) Ltd
- Vilander Pans Salt Prospect – Transalt - Upington

Mining Permits and Rights (including full Public Participation and compilation of EMPs inclusive of EIAs)

- Caledon Manganese Mining Permit – Rand Gold Reclamation (Pty) Ltd
- Pentlands Granite Quarry Mining Right near Empangeni (KZN) – Masa Mzantsi Cement (Pty) Ltd
- Gamohaan Aggregate Quarry near Kuruman (Permit) – Afrimat Group
- Cawood Salt Mine at Sout River mouth (Amendment of existing Right) – Cawood Salt (Pty) Ltd
- Kuipersbult Aggregate Mining Right near Lephalale (Limpopo) as source for Medupi Power station construction – Afrimat Group
- Dikpens Gypsum Mine Extension (Bushmanland) – St Gobain Group
- Yserfontein Pan Gypsum - Amendment of Mining Right including update of EMP – St Gobain Group
- Gypsum Mine near Vanrhysdorp - Mining Right – PPC (Right now owned by St Gobain Group)
- Transand Aggregate mine near Hartenbos - Mining Right – Transand (Pty) Ltd
- Aggregate and sand mine on municipal owned land in Gansbaai (Permit and Right)- Sisiza Ukhanyo Trading 410 (Pty) Ltd
- Sand mining permit near Salmonsdam Nature Reserve, Stanford – DJ Transport (Pty) Ltd
- Limestone Mining Right north of Klawer – Now held by Afrimat (previously Cape Lime (Pty) Ltd)
- Sand Mining permits near Gouritz River / Vlees Bay – Transand Group
- Welbedagt East Gravel Permit – Mossel Bay – Transand Group
- Phosphate Mining Right near Langebaanweg - Gecko Fert (Pty) Ltd
- Oyster Bay Mining Right application for Aggregate – Denron Group
- Moddergat Sand Mining Right (between Worcester and Villiersdorp) – Afrimat Group
- Mining Right for Manganese near Swellendam – Aquarella (Pty) Ltd
- Mining Right for Sand – Atlantis / Brakkefontein – ZLLD Sand (Pty) Ltd
- Mining Permits for pegmatite minerals at Spodumene Kop and Norrabees - Namli Group
- Mining Right for Dolerite – Doornfontein – Power Group
- Involvement to a greater or lesser degree in at least 50 other Mining Permit and Mining Right applications
- EMP updates / amendments (some of which did not require public participation) for several operations (at least 20).

Environmental Performance / Audit Assessments (monitoring) of the following sites on once-off or regular basis. First compiled in terms of Reg 55 of MPRDA prescriptions and since December 2014 guided by NEMA requirements (Appendix 7 and Regulation 34 of NEMA):

- Crammix Clay Mine (Brakenfel)
- Botriver Sand mine (Steyns)
- K1 Quarry (George)
- Cawood Salt Mine (Sout River)
- Swellendam Manganese Mine
- Buffelsbank Diamond Mine
- Gecko Fert Phosphate Prospects
- Cape Lime Limestone Mine near Vredendal
- Denron operations (Sand and Aggregate) Knysna / Plettenberg Bay area
- Dimension Stone Mines of Verde Bitterfontein (Namaqualand)
- Limestone quarries in Bredasdorp and Vredendal
- Lime Sand near Saldanha – Marine Lime
- Cawood Salt Mine on West Coast
- 3 x Salt Mines north of Upington
- PPC Gypsum Mine near Vanrhynsdorp
- Lafarge Western Cape operations including Tygerberg, Dorstberg, Peak and Saldanha Quarries
- Maskam Gypsum Mine near Vanrhynsdorp – Venatouch (Pty) Ltd
- Nama Copper: Retreatment of existing dumps at Nababeep
- Various Afrimat aggregate operations throughout the country
- Setting up of Environmental Monitoring Committee at Yzerfontein Gypsum Mine
- Setting up of Environmental Monitoring Committee at George K1 Quarry
- Johnsons Brick Clay Mine (Oudtshoorn)
- Farm 256 Portion 4 Gypsum Prospect – Venatouch (Pty) Ltd

Closure Applications (for mining and prospecting operations):

- Gecko Fert Phosphate Prospecting Rights and Mining Permit
- Knysna Whitebridge Quarry
- Denron Funda and Helderwater Quarry – Plettenberg Bay
- Crammix Clay Mine (Brackenfel)
- Vaale Valley Sand Mine (Mossel Bay)
- Various Dimension Stone bulk samples for Verde Bitterfontein (Namaqualand)
- Bergsig / Farm 292 Closure (Hartenbos)
- Klipfontein Sand Mine (Vlees Bay)
- Welbedagt Gravel Permit (Herbertsdale / Mossel Bay)
- Partial Closure of unutilised portions of Peninsula Quarry – Afrisam Group

“One Environmental System” applications (Post 8 December 2014) all conducted in terms of NEMA EIA process requirements:

- Cape Lime Sand Mine (Schaap Kraal operation) – Afrimat
- Atlantis Foundries Sand Mine Ptn 8 – ZLLD Sand Mining (Pty) Ltd
- Atlantis Foundries Sand Mine Prospect (Ptn 4 & 5) – ZLLD Sand Mining (Pty) Ltd
- De Hoek Sand Mining Right – Buy-Line Trading (Pty) Ltd
- Denver Quarry Section 102 (MPRDA)– Afrimat
- Desert Rose Dimension Stone Mine – Application only
- Naroogna Pan Salt Mine – United Salt (Pty) Ltd
- Stanford Quarry Extension – Afrimat
- Bester Calcrete Mining Permit – West Coast Calcrete
- Commissioner Pan Salt Mine – Dwaggas Salt Works (Pty) Ltd
- Lezmin Sand Mine (Gouritz Area) – Lezmin 2021 CC
- Yzerfontein Gypsum Mine (Section 102) – St Gobain Construction Materials (SA)
- Skietkuil Quarry Mining Permit – Skietkuil Quarries CC
- Honingklip Gravel Mining Permit – Western Cape Construction Materials (Pty) Ltd
- Johnsons Clay Brick Oudtshoorn (Mining Right Amendment)
- Okiep Dumps Reprocessing Application – O’okiep Copper Company Ltd
- Karoo One / Bo Plaas Sand and Gravel Mining Permit
- Salt Prospect – Gembok Horn (N Cape) – Transalt (Pty) Ltd
- Bosluispan Diamond Mine (Section 102 Application) – Kori Diamonds (Pty) Ltd
- Oena Diamond Mine (Section 102 Application) – African Star Minerals
- Welbedagt East Gravel Permit– Mossel Bay - Buyline Trading
- Gembok Horn Salt Prospect – Upington – Industrial Salt
- Okiep Tailings Investigation – OCC – Okiep and Carolusberg
- Regulation 31 Application: Kliprug Quarry for Batch Plant - Afrimat
- Kolkies River Gypsum Mine – Ceres- Kolkiesrivier Gypsum (Pty) Ltd
- Grootwitpan Salt Mine Expansion and Consolidation- North of Upington- Industrial Salt
- Salt at Gembok Horn (North of Upington) – Transalt (Pty) Ltd
- Manganese Prospect Waboomskloof – MN108 (Pty) Ltd
- Nickel and associated Minerals Prospecting Right Kliprand - BME100 (Pty) Ltd
- Diamond Prospect Koa Valley – Rooiberg Mining (Pty) Ltd
- Pearly Beach Die Dam Quarry Permit – Penmyn (Pty) Ltd
- Nababeep Slag Dumps reprocessing – Nama Copper (Pty) Ltd

- Kleinkrans Sand Mine Expansion – Wilderness – Denron Plant (Pty) Ltd
- Smalblaar Quarry Expansion – Rawsonville - Afrimat Operations (Pty) Ltd
- K1 Quarry Amendment Application – George – Lezmin 2021 (Pty) Ltd
- Doornfontein Mining Right - Power Group – Laingsburg
- Prospect 1006 – Afrimat – Western Cape
- Vilander Pans Salt Prospect – Transalt – Upington
- Olympic Sand Mine Amendment Application – Afrimat Group – Macassar
- SSB Sand Mine Amendment – SSB Group - Macassar

Standalone NEMA Applications

- Application for Jetty, Erf 223, G Takis

Section 24G Applications:

- Makulu Quarry – Denron
- Swellendam Manganese Mine – Sikhova Environmentally Friendly Building Solutions
- Illegal Waste Disposal Site – Die Kop – Plettenberg Bay
- Smalblaar Quarry – Stockpiling area – Afrimat

DECLARATION OF THE EAP

I, CRAIG DONALD, declare that –

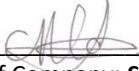
General declaration:

- I act as the independent environmental practitioner in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in regulation 8 of the Regulations when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- I will keep a register of all interested and affected parties that participated in a public participation process; and
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not all the particulars furnished by me in this form are true and correct;
- will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;
- ~~I have a vested interest in the proposed activity proceeding, such vested interest being:~~

Signature of the Environmental Assessment Practitioner



Name of Company: **Site Plan Consulting**