

No	Activity	Aspect	Impact / Risks	Significance	Probability	Sensitivity of the Aspect	Severity of the Impact	Duration	Scale / Extent	Significance (without Mitigation)	Mitigation (can the impact be reversed, avoided, managed or mitigated?)	Probability	Sensitivity of the Aspect	Severity of the Impact	Duration	Scale / Extent	Significance (with Mitigation)
1	Removal of vegetation from new TSF footprint	Terrestrial Biodiversity	Direct loss of species & habitat	Vegetation clearance will definitely take place. Given the site location at the old Bramber TSF footprint, vegetation is not regarded as sensitive. The impact will be of high severity as vegetation will be destroyed entirely on footprint areas. The duration will be permanent, given the TSF will remain after closure. The impact will be isolated to the footprint area. Overall, impact significance is regarded as Moderate. Impact duration can be reduced by rehabilitation (re-instating vegetation on the TSF) but this does not significantly reduce impact significance.	5 Definite	1 Not sensitive	4 Moderate to High	5 Permanent	1 Isolated	55 Moderate	Demarcate footprint area clearly and prevent vegetation clearance outside of the area absolutely required for construction of the proposed new TSF. Verify the presence / absence of protected or sensitive species prior to initiating vegetation clearance, and ensure the necessary permits are obtained if required prior to disturbing such species. Ensure concurrent rehabilitation of the TSF side slopes as it is developed, and the implementation of final rehabilitation measures after life of the facility is reached.	5 Definite	1 Not sensitive	4 Moderate to High	4 Long Term	1 Isolated	50 Moderate
3	Removal of Vegetation for road upgrades and reclamation of material from historic dumps	Terrestrial Biodiversity	Direct loss of species & habitat	In the absence of detailed vegetation studies, vegetation is regarded as very sensitive. Vegetation clearance will definitely take place and impact severity will be high. Mitigation and rehabilitation will be able to reduce the duration and extent of the impact.	5 Definite	4 Very sensitive	4 Moderate to High	4 Long Term	3 Local	75 High	Keep affected footprints to the absolute minimum required and demarcate areas clearly to prevent unnecessary clearance of vegetation. Ensure permits for the relocation of protected species (if any) are obtained prior to any clearance taking place. Retain species for use in rehabilitation. Implement concurrent rehabilitation and ensure rehabilitation is successful by monitoring and adjusting rehabilitation measures as required.	5 Definite	4 Very sensitive	4 Moderate to High	2 Short to Medium Term	1 Isolated	55 Moderate
4	Presence of employees on site for construction of TSF, roads and reclamation activities.	Terrestrial Biodiversity	Illegal harvesting of plants and animals (Poaching)	Illegal harvesting is considered highly likely in the absence of mitigation measures. In the absence of detailed studies, affected fauna and flora is regarded as highly sensitive and impact severity is rated as High. The risk will cease as activities conclude and employees leave the areas. Without mitigation the impact could extend to the wider areas.	4 Highly Probable	4 Very sensitive	4 Moderate to High	3 Medium Term	3 Local	56 Moderate	Employee awareness training could reduce the likelihood of illegal harvesting taking place and reduce the impact severity and scale. Prevent access to adjacent areas and the nature reserve by providing proper oversight and transportation to construction crews.	2 Possible	4 Very sensitive	3 Moderate	3 Medium Term	1 Isolated	22 Low
5	Site disturbance, construction activities (roads, TSF), reclamation activities and material transport. Operation of new TSF.	Terrestrial Biodiversity	Habitat degradation due to dust, emissions, water quality impacts and general disturbance of the sites	Habitats in the mountainous areas are considered sensitive in the absence of detailed ecological studies. Road construction and reclamation activities will most likely result in habitat degradation. Mitigation measures can reduce impact severity, duration and scale.	4 Highly Probable	4 Very sensitive	3 Moderate	4 Long Term	3 Local	56 Moderate	Control dust and emissions arising from activities. Minimize activity footprint. Implement measures to prevent water pollution (sedimentation from erosion and pollution from spillages). Rehabilitate areas once reclamation from a dump is complete (shape and vegetation).	3 Probable	4 Very sensitive	2 Slight to Moderate	3 Medium Term	1 Isolated	30 Low
6	Disposal of removed alien vegetation leading to establishment of alien species	Terrestrial Biodiversity	Increased proliferation of alien invasive species.	Disposal of vegetative material could possibly result in alien or invasive species spread. The aspect is regarded as very sensitive and the impact will manifest in the long term over the local area without mitigation. Severity is regarded as moderate and overall significance is Low without mitigation. Mitigation can reduce the scale and duration of the potential impact.	2 Possible	4 Very sensitive	3 Moderate	4 Long Term	3 Local	28 Low	Ensure plant material that is removed from site is disposed of legally and so as to prevent the spread of alien species from seeds which may be present in the removed vegetative material.	2 Possible	4 Very sensitive	3 Moderate	3 Medium Term	2 Site	24 Low
7	General disturbance	Terrestrial Biodiversity	Increased proliferation of alien invasive species.	Further disturbance of the site is highly likely to result in proliferation of alien and/or invasive species throughout the site, which could spread to a local scale without mitigation. Such an impact would be of moderate to high severity, on a very sensitive aspect, in the long term. Over-all significance is regarded as high without mitigation. Management measures can potentially reduce the likelihood, extent, duration and magnitude of the impact.	4 Highly Probable	4 Very sensitive	4 Moderate to High	4 Long Term	3 Local	60 High	Compile and implement alien invasive species identification and management plan throughout the project. Rehabilitate areas and continue to monitor and manage until viable ecosystems have re-established.	3 Probable	4 Very sensitive	2 Slight to Moderate	2 Short to Medium Term	1 Isolated	27 Low
8	Increased construction and mine vehicles on roads - accidental collisions.	Terrestrial Biodiversity	Fauna mortalities	Fauna mortalities on roads is highly likely to increase due to increased vehicular activity, especially in the mountains. Fauna of the area is regarded as very sensitive in the absence of detailed studies. The impact will be of high severity and medium term, but will be limited in extent. Impact likelihood can be reduced by mitigation measures.	4 Highly Probable	4 Very sensitive	5 High	3 Medium Term	2 Site	56 Moderate	Strict speed limits and driver awareness training. Vehicles will use only existing and approved routes. No driving on these roads will be allowed at night-time.	2 Possible	4 Very sensitive	5 High	3 Medium Term	1 Isolated	26 Low
9	Lighting at the site attracting insects.	Terrestrial Biodiversity	Fauna mortalities	It is highly probable that lighting will attract insects resulting in their death, which is regarded as a high severity impact to a sensitive aspect. Lighting will probably not affect insect populations beyond the site. The impact duration at the new TSF is permanent. Mitigation can reduce the probability and extent of the impact.	4 Highly Probable	4 Very sensitive	5 High	5 Permanent	2 Site	64 High	Use appropriate downlights and only where necessary.	2 Possible	4 Very sensitive	4 Moderate to High	5 Permanent	1 Isolated	28 Low
10	Incorrect waste management and bad housekeeping	Terrestrial Biodiversity	Attracting problem animals to site	It is possible that problem animals will be attracted by incorrect waste management. The impact is of moderate severity, medium term and may affect the whole site. Over-all significance is considered low, and is further reduced by proper waste management at the site.	2 Possible	3 Sensitive	3 Moderate	3 Medium Term	2 Site	22 Low	Ensure proper housekeeping and adequate waste management in designated facilities to ensure separation of waste and that waste is not stored on site for excessive periods of time.	2 Possible	3 Sensitive	3 Moderate	3 Medium Term	1 Isolated	20 Low
11	Vegetation clearance, soil stripping and construction of new TSF	Aquatic Biodiversity	Deterioration of surface water quality	It is highly probable that construction activities will lead to sedimentation in the absence of mitigation. The receiving water body (Suidkaap River) is regarded as highly sensitive. Impact severity of sedimentation is considered moderate, and short-term given the duration of the construction phase, but impacts could manifest beyond the local area.	4 Highly Probable	4 Very sensitive	3 Moderate	2 Short to Medium Term	4 Regional	52 Moderate	Implement erosion control measures and sediment traps to reduce impact probability, severity and extent.	2 Possible	4 Very sensitive	3 Moderate	2 Short to Medium Term	2 Site	22 Low
12	Operation of new TSF	Aquatic Biodiversity	Deterioration of surface water quality	Unchecked surface water runoff on potential seepage from the new TSF will probably lead to pollution of very sensitive downstream water resources if not mitigated. The impact will be permanent given the nature of the TSF, of moderate severity and potentially extending beyond the local area.	3 Probable	4 Very sensitive	3 Moderate	5 Permanent	4 Regional	48 Moderate	Design and construction of the new TSF will be to the relevant engineering standards to prevent seepage and contaminated runoff from entering downstream water resources. Aquatic Biomonitoring and Water monitoring and reporting as per the IWUL conditions should continue (per updated IWUL for the proposed new TSF).	2 Possible	4 Very sensitive	3 Moderate	5 Permanent	2 Site	28 Low
13	Construction of roads to access historic dumps	Aquatic Biodiversity	Deterioration of surface water quality	The routes to the historic dumps affect several drainages on the mountainsides. The planned road upgrades could cause siltation of receiving waterbodies. In the absence of detailed studies, receiving water bodies are deemed very sensitive. The impact will be moderate, given the distance from the roads to nearby streams, and will only manifest during the construction phase, and likely be limited to the site.	3 Probable	4 Very sensitive	3 Moderate	2 Short to Medium Term	2 Site	33 Low	Implement erosion control measures and sediment traps to reduce impact probability, severity and extent.	2 Possible	4 Very sensitive	2 Slight to Moderate	2 Short to Medium Term	1 Isolated	18 Insignificant
14	Reclamation of historic dumps in/near watercourses	Aquatic Biodiversity	Deterioration of surface water quality	Physical reclamation of material that was dumped within watercourses, will cause sedimentation of the watercourses are flowing. Watercourses are regarded as very sensitive in the absence of detailed studies. Impact severity will be moderate-high but only last for the duration of reclamation activities and be limited to the site.	4 Highly Probable	4 Very sensitive	4 Moderate to High	2 Short to Medium Term	2 Site	48 Moderate	Implement erosion control measures and sediment traps to reduce impact severity and extent. Once the dumps are reclaimed, it is expected that surface water quality will improve as drainage lines will not longer be affected by the historically dumped material.	4 Highly Probable	4 Very sensitive	2 Slight to Moderate	2 Short to Medium Term	1 Isolated	36 Low

15	Stripping of remaining topsoil in preparation for TSF construction	Soils, land use and capability	Loss of topsoil	At least some topsoil (regarded as a sensitive resource) will definitely be lost if the impact is not mitigated. The area is small (6.5 Ha). Mitigation should aim to reduce impact likelihood.	5 Definite	3 Sensitive	3 Moderate	4 Long Term	1 Isolated	55	Moderate	Strip topsoil ahead of construction and stockpile separately. Protect stockpiles from erosion, compaction and pollution. Limit stockpile height and slope angle. Vegetate long term stockpiles (material that will not be used in rehabilitation within three months).	2 Possible	3 Sensitive	3 Moderate	4 Long Term	1 Isolated	22	Low
17	Stripping of soils for road upgrades and recovery of material from historic dumps	Soils, land use and capability	Loss of topsoil	It is considered unlikely that any topsoil remains on the road footprints, or on the historic dumps.	2 Possible	4 Very sensitive	3 Moderate	4 Long Term	1 Isolated	24	Low	The specialist soil study will verify the status of soils on the site. It is anticipated that reclamation of the historically dumped material will expose underlying topsoil resources which may recover.	2 Possible	4 Very sensitive	3 Moderate	4 Long Term	1 Isolated	24	Low
18	Stockpiling of topsoil	Soils, land use and capability	Loss of topsoil	Without mitigation, it is highly likely that stockpiles will become polluted or erode. Topsoil is regarded as sensitive. Mitigation should reduce the impact likelihood.	4 Highly Probable	4 Very sensitive	4 Moderate to High	4 Long Term	1 Isolated	52	Moderate	Protect stockpiles from erosion, compaction and pollution. Limit stockpile height and slope angle. Vegetate long term stockpiles (material that will not be used in rehabilitation within three months). Prevent vehicle access on stockpiles. Prevent use of chemicals on stockpiles. Prevent alien invasive species from establishing on stockpiles and eradicate / control if these do establish despite prevention methods.	2 Possible	4 Very sensitive	4 Moderate to High	4 Long Term	1 Isolated	26	Low
19	Vehicle movement, road construction, establishment of new TSF	Soils, land use and capability	Soil compaction (leading to reduced infiltration, increased runoff etc.)	Soils on roadways and infrastructure areas will definitely be compacted. Soils are regarded as sensitive in the absence of detailed studies. The impact severity is moderate - high and may manifest over the whole site in the long term, without mitigation. Management and rehabilitation can reduce the scale and duration of the impact.	5 Definite	4 Very sensitive	4 Moderate to High	4 Long Term	2 Site	70	High	Limit vehicle movement and construction footprints to approved, minimum required area. Rehabilitate roads once no longer required to access historic dumps.	5 Definite	4 Very sensitive	3 Moderate	Short to 2 Medium Term	1 Isolated	50	Moderate
20	Reclamation of historic dumps from the MRA that overlaps with the Nature Reserve	Land Use	Perceived change in land use from conservation to mining	At a distance, the historic dumps within the nature reserve are not identified by the layman as such. Reclamation activities will most likely look out of place to tourists and conservationists. The issue of conflicting land uses is deemed very sensitive and the severity will be moderate - high. It is anticipated that the impact will be of short duration and isolated due to screening afforded by vegetation and topography.	4 Highly Probable	4 Very sensitive	4 Moderate to High	1 Short Term	1 Isolated	40	Moderate	Ensure adequate public consultation to manage public perception and expectation (avoid surprise). Ensure the area is adequately rehabilitated and limit affected footprint as far as possible to reduce impact severity.	4 Highly Probable	3 Sensitive	3 Moderate	1 Short Term	1 Isolated	32	Low
21	New TSF construction & operation	Land Use	Reduced Land Capability	The site was previously used for a TSF and land capability is only reduced in the additional 6.5 Ha affected between the existing New Bramber TSF and reclaimed Bramber TSF, which area is not regarded as sensitive.	5 Definite	1 Not sensitive	1 Slight	4 Long Term	1 Isolated	35	Low	No mitigation available or required, the affected land (6.5 Ha between the original Bramber and New Bramber TSFs) will be the only land affected.	5 Definite	1 Not sensitive	1 Slight	4 Long Term	1 Isolated	35	Low
23	Exposed areas, Vehicle and machinery operation causing dust and fugitive emissions	Air Quality	Deterioration in air quality	Vehicle and machinery operation, and exposed areas after vegetation clearing, will almost definitely give rise to increased dust and emissions. Air quality is deemed a sensitive aspect. The impact is not expected to be severe given the context and will be short-lived (cease once construction and reclamation is complete and areas rehabilitated). Air quality impacts can affect regional air quality beyond the site.	4 Highly Probable	3 Sensitive	2 Slight to Moderate	Short to Medium Term	3 Local	40	Moderate	Limit exposed areas (extent and duration). Ensure vehicles and machinery are in good working order to avoid excessive emission when machines are in disrepair. Expand the mine's dust fallout monitoring programme and ensure compliance to dust standards. Monitor PM10 and PM2.5 and report to NAEIS. If standards are exceeded, implement stricter dust control measures (wetting, chemical suppressants, road surfacing to name a few options to consider).	3 Probable	3 Sensitive	2 Slight to Moderate	Short to Medium Term	2 Site	27	Low
24	Fires (accidental or deliberate)	Air Quality	Deterioration in air quality	If not mitigated, it is highly likely that the construction workforce will have cooking fires and potentially burn waste on site. This could easily lead to accidental veld fires which could spread regionally. The aspect is regarded as very sensitive and severity would be high. The risk is eliminated once the workforce leaves the site.	4 Highly Probable	4 Very sensitive	5 High	Short to Medium Term	3 Local	56	Moderate	Fires will not be allowed on site. Awareness training will also emphasize the risks and impact of fires. All waste to be managed in accordance with the Mine's waste management plan and applicable norms and standards. As a local land owner it is recommended that BML adheres to the guidelines set out by the local Fire Protection Association (LEFPA, http://www.lefpa.co.za/) and maintain the relevant permits and fire-breaks in areas of their control.	4 Highly Probable	3 Sensitive	3 Moderate	3 Medium Term	1 Isolated	40	Moderate
25	Vegetation clearance and soil stripping leading to erosion and subsequent downstream sedimentation	Surface Water	Deterioration of surface water quality	Erosion is considered highly likely if not mitigated. Local surface water resources are very sensitive and the impact severity will be moderate-high and could affect the local catchment as long as construction and/or reclamation activities occur.	4 Highly Probable	4 Very sensitive	4 Moderate to High	Medium Term	3 Local	56	Moderate	Prevent erosion on site. Keep cleared areas to the minimum area required and install silt traps at discharge points of clean water systems to reduce impact likelihood, severity and extent.	2 Possible	4 Very sensitive	3 Moderate	3 Medium Term	2 Site	24	Low
26	Use of chemicals and chemical toilets on site during construction / reclamation activities	Surface Water	Deterioration of surface water quality	If not managed, spills are highly probable. Chemical / sewage spills will have a high severity, and can affect the whole local area in the long term. Management measures will aim to prevent spills, and contain the extent of accidental spills.	4 Highly Probable	4 Very sensitive	5 High	4 Long Term	3 Local	64	High	Contain dirty water on site as per GN704. Ensure facilities are constructed to prevent spills, and contain spills in the event of an accident. Implement Emergency Response Plans in the event of accidental spills. Appoint reputable contractor to service temporary toilets to ensure prevention of sewage spills.	2 Possible	4 Very sensitive	5 High	4 Long Term	1 Isolated	28	Low
27	Surface water runoff contaminating downstream environments.	Surface Water	Deterioration of surface water quality	There is always a possibility for water management infrastructure to overtop or leak. If this happens, it could affect the local catchment in the medium term in moderate-high severity.	2 Possible	4 Very sensitive	4 Moderate to High	Medium Term	3 Local	28	Low	All infrastructure will be designed in accordance with GN704, and to contain the 1:100-year flood to prevent overtopping of dirty water containment infrastructure into clean water systems. Water containment infrastructure to be operated with adequate freeboard.	2 Possible	4 Very sensitive	4 Moderate to High	3 Medium Term	3 Local	28	Low
28	Containment of water on site (in dirty water catchments)	Surface Water	Reduced surface water availability	The impact will definitely manifest as it is a legal requirement to contain dirty water on site. Due to the location of the new TSF at the old Bramber TSF footprint (which is also part of the dirty-water catchment) the impact is expected to be slight but will be permanent and could affect the local catchment.	5 Definite	4 Very sensitive	1 Slight	5 Permanent	3 Local	65	High	Maintain the Mine's dirty water footprint as small as possible. Ensure adequate rehabilitation of the TSF at closure to allow surface runoff to report back to the clean water system.	5 Definite	4 Very sensitive	1 Slight	4 Long Term	2 Site	55	Moderate
29	Spills on site leaching to groundwater.	Groundwater	Deterioration of groundwater quality	Spills on site are highly probable if not managed/prevented. Groundwater is regarded as sensitive (specialist study in the EIA phase will confirm this). Impact severity will be moderate in the long term and could affect the whole local area.	4 Highly Probable	3 Sensitive	3 Moderate	4 Long Term	3 Local	52	Moderate	Spill prevention and management on site. Ensure dirty water is contained on site and treated prior to discharge. Ensure vehicle/machinery servicing, chemical storage etc. only occurs in purpose-built facilities with impervious floors. Groundwater monitoring as per IWUL.	2 Possible	3 Sensitive	3 Moderate	4 Long Term	3 Local	26	Low
30	TSF and RWD impacts on groundwater quality.	Groundwater	Deterioration of groundwater quality	It is highly likely that the new TSF (and the existing New Bramber TSF and other TSFs on site) may have a permanent, moderate-high impact on regional groundwater. The EIA-phase specialist study will confirm this.	4 Highly Probable	3 Sensitive	4 Moderate to High	5 Permanent	4 Regional	64	High	Ensure that seepage of contaminated water to groundwater from the new TSF is prevented (i.e. by lining of the facility and/or intercepting potential seepage and returning water to the dirty-water system). The EIA-Phase specialist study will model the extent of potential contaminant transport and provide possible mitigation measures. It is expected that mitigation will be able to lessen the extent and severity of the impact.	4 Highly Probable	3 Sensitive	3 Moderate	5 Permanent	3 Local	56	Moderate

31	Construction and presence of the new Fairview TSF	Visual Resources	Alteration of the Visual Resource	The new TSF will definitely alter the visual resource, which is not regarded as sensitive against the backdrop of the other TSFs and mining infrastructure in this area. The severity of the impact will be slight to moderate (at most) considering the existing New Bramer TSF. The impact will be permanent and likely be visible on a local scale	5	Definite	1	Not sensitive	2	Slight to Moderate	5	Permanent	3	Local	55	Moderate	Implementation of the Mine's rehabilitation plan will lessen impact severity and duration to an extent (the TSF will still be present but blend in with its surroundings). Careful consideration to night-time lighting can also reduce impact severity and extent of night.	5	Definite	1	Not sensitive	1	Slight	3	Medium Term	2	Site	35	Low
32	Reclamation of the historic dumps	Visual Resources	Alteration of the Visual Resource	Reclamation activities will alter the visual resource, which is sensitive within the BNR. Severity is expected to be rather high but duration is not extensive and the topography will probably limit the zone of visual influence.	5	Definite	3	Sensitive	4	Moderate to High	1	Short Term	1	Isolated	45	Moderate	Ensure the affected footprints are limited as far as possible and that adequate and concurrent rehabilitation (including shaping and re-vegetation) is implemented. No night-time activities should be allowed.	5	Definite	3	Sensitive	2	Slight to Moderate	1	Short Term	1	Isolated	35	Low
33	Operation of machinery and equipment and movement of vehicles	Noise	Increased ambient noise	It is likely that the project activities will contribute to the generation of noise. In the context of the existing Mine, the aspect is not considered sensitive and the severity is not expected to be significant or audible beyond the activity footprints.	3	Probable	3	Sensitive	2	Slight to Moderate	3	Medium Term	2	Site	30	Low	No construction or reclamation activities should occur at night-time. Vehicles and machinery should be serviced regularly to prevent the noise these machines can generate if they are in disrepair.	3	Probable	3	Sensitive	1	Slight	3	Medium Term	2	Site	27	Low
34	Movement of vehicles to and from reclamation activities	Employee safety	Accidents / collisions on mountain roads	If not mitigated, it is highly probable that employee safety will be negatively affected, considering the mountainous terrain. If the impact manifests it may be of high severity, permanent nature on an irreplaceable aspect (loss of life). Such impact would have a local extent and is regarded as high. Mitigation reduces the impact likelihood.	4	Highly Probable	5	Irreplaceable	5	High	5	Permanent	3	Local	72	High	Ensure the road upgrades on the mountain roads include adequate safety measures (mirrors, line-of-sight where possible, speed-reducing-measures). Implement driver training. Prevent pedestrian use of roads in this area.	2	Possible	5	Irreplaceable	5	High	5	Permanent	3	Local	36	Low
35	Presence of employees on site for construction of TSF, roads and reclamation activities.	Safety Security &	Workers accessing restricted areas outside of the site.	It is possible that workers at the mine may access areas outside of the site and give rise to security concerns. People employed by the mine are less likely to engage in criminal activity than unemployed individuals. This is regarded as a very sensitive aspect given the crime statistics of the country, and the problems experienced with illegal mining in the area.	2	Possible	4	Very sensitive	5	High	4	Long Term	3	Local	32	Low	Implement Environmental awareness training programs. Prevent access to unauthorised areas. Set up a community safety forum.	2	Possible	4	Very sensitive	5	High	4	Long Term	3	Local	32	Low
36	Presence of new Fairview TSF	Community Safety	TSF Failure	The TSF is being designed by qualified engineering teams to acceptable standards. However, there is always some possibility of failure which could result in loss of life (permanent loss of an irreplaceable aspect impacting on a local scale). The probability of this occurring is however regarded as low.	2	Possible	5	Irreplaceable	5	High	5	Permanent	3	Local	36	Low	There is always a risk of failure of impoundment infrastructure. All relevant engineering standards to be implemented in design and construction. Monitoring to be undertaken to ensure stability of infrastructure and prevent failure, which would impact downstream land uses and people.	2	Possible	5	Irreplaceable	5	High	5	Permanent	3	Local	36	Low
37	Reclamation of dumps older than 60 years	Heritage Resources	Destruction of historic "structures"	The impact will definitely manifest as the applicant is applying to reclaim material from these dumps. The specialist study in the EIA phase will confirm, but it is not expected that these dumps are sensitive. Impact severity will be high and permanent, but isolated.	5	Definite	1	Not sensitive	5	High	5	Permanent	1	Isolated	60	High	No mitigation is possible, other than the no-go option which would mean the dumps will remain as they are (definitely obstructing and potentially polluting water resources).	5	Definite	1	Not sensitive	5	High	5	Permanent	1	Isolated	60	High
38	Construction and reclamation activities	Heritage Resources	Damage to or undetected heritage resources	It is possible that other heritage resources, as yet unknown, may be damaged by the activities. Impacts to heritage resources are considered permanent, high-severity impacts on irreplaceable resources.	2	Possible	5	Irreplaceable	5	High	5	Permanent	1	Isolated	32	Low	Undertake an Archaeological Impact Assessment in the EIA Phase to identify All heritage resources in proximity of potentially affected footprints, and implement the recommendations of the specialist.	2	Possible	5	Irreplaceable	5	High	5	Permanent	1	Isolated	32	Low