

BASIC ASSESSMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN FOR THE CLOSURE OF THE HACKNEY 116KT PROSPECTING RIGHT

Hackney 116KT

MAY 2019

SUBMITTED FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998) IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002) (AS AMENDED)

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SLR 

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BASIC ASSESSMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN FOR THE CLOSURE OF THE HACKNEY 116KT PROSPECTING RIGHT

EXECUTIVE SUMMARY

PROJECT BACKGROUND

Marula Platinum (Pty) Ltd (Marula) owns and operates a platinum mine approximately 35 km north west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province. Marula holds a Prospecting Right (DMR Ref No: 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite) and copper ore, and chrome ore on a portion of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area. The regional and local settings are illustrated in Figure 1 and Figure 2 respectively. The abovementioned prospecting right is included in Appendix A.

In 2007 and 2012 Marula undertook prospecting activities on the farm Hackney, during which time five out of ten approved exploration boreholes were drilled. In 2012, access to the prospecting right area was denied on various occasions by members of the Djate/Modimolle/Matukwaneng communities and after numerous unsuccessful attempts to resolve matters raised by these communities, Marula has not been able to continue with prospecting.

In line with the Implats' strategic review of its operations, the Marula Board resolved in May 2017 to exit and close the Hackney prospecting right, and not to pursue the conversion of the prospecting right into the Marula mining right, as there was no reasonable prospect to include the area in the 30 year Mine Plan.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Marula to manage the environmental authorisation processes associated with the closure of the Hackney prospecting right.

SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the prospecting right, the following is required:

- A Closure Certificate from the DMR in terms of Section 43(4) of the MPRDA.
- An environmental authorisation from the DMR in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended. The relevant listed activities are included in Section 3.1.

STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced prior to the submission of the BAR (Basic Assessment Report) and has continued throughout the environmental assessment process. As part of this process, commenting authorities and interested and affected parties (IAPs) were given the opportunity to review the background information document (BID) and now the BAR and submit questions and comments to the project team. All comments submitted to date by the commenting authorities and IAPs have been included and addressed in this BAR. Further comments arising during the review of the BAR report will be handled in a similar manner.

This BAR has been distributed for a 30 day comment period from **17 May 2019 to 19 June 2019** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the BA process. Copies of the full report will be made available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and at the Marula Mine. Electronic copies (compact disk) of the report are available from SLR, at the contact details provided below.

All comments received during the review process will be addressed in the BAR that is submitted for decision-making.

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IMPACTS AND MANAGEMENT ACTIONS

This section provides a summary of the assessment of the potential impacts. The potential impacts/risks have been assessed against the prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. Given that decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed, this assessment focusses on potential residual impacts/risks as a result of the rehabilitation phase only. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr, therefore the assessment of the mitigated scenario is where additional mitigation measures are deemed necessary. The table below provides a summary of the potential impacts in no particular order of importance.

Aspect	Potential impact	Reference to mitigation measures	Significance (Unmitigated) (takes into account measures implemented as per approved EMPr)
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	No additional mitigation required. Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.	Very Low
Land-use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	No additional mitigation required. Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.	Very Low
Visual	Change in the visual landscape of the area	No additional mitigation required.	Insignificant
Socio-economic	Negative and positive socio-economic impacts	No additional mitigation is possible due to Marula being denied access to the area. It is recommended that as part of a DMR visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents as an annexure to this report.	Very Low

ENVIRONMENTAL STATEMENT

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation is required; passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BA	Basic Assessment
BAR	Basic Assessment Report
BEE	Black Economic Empowerment
BIC	Bushveld Igneous Complex
BID	Background Information Document
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
GDARD	Gauteng Department of Agriculture & Rural Development
GNR	Government Notice Regulation
I&APs	Interested and Affected Parties
IBAs	Important Bird and Biodiversity Areas
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act
NWA	National Water Act
PGMs	Platinum Group Metals
RLS	Rustenburg Layered Suite
SACNASP	South African Council for Natural Scientific Professions
SLR	SLR Consulting (Africa) (Pty) Ltd

INTRODUCTION

This chapter provides a brief description of the project background, describes the purpose of this report, summarises the legislative authorisation requirements, provides the study terms of reference and outlines the opportunity for comment.

PROJECT OVERVIEW

Marula Platinum (Pty) Ltd (Marula) (of which the shareholding is 73% held by Impala Platinum Holdings Limited (Implats), 9% held by Mmakau Platinum Mining (Pty) Ltd, 9% held by Tubatse Platinum (Pty) Ltd, and 9% held by the Marula Community Trust) owns and operates a platinum mine approximately 35 km north west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province. Marula holds a Prospecting Right (DMR Ref No: 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite) and copper ore, and chrome ore on a portion of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area. The regional and local settings are illustrated in Figure 1 and Figure 2 respectively. The abovementioned prospecting right is included in Appendix A.

In 2007 and 2012 Marula undertook prospecting activities on the farm Hackney, during which time five out of ten approved exploration boreholes were drilled. In 2012, access to the prospecting right area was denied on various occasions by members of the Djate/Modimolle/Matukwaneng communities and after numerous unsuccessful attempts to resolve matters raised by these communities, Marula has not been able to continue with prospecting.

In line with the Implats' strategic review of its operations, the Marula Board resolved in May 2017 to exit the Hackney prospecting right, and not to pursue the conversion of the prospecting right into the Marula mining right, as there was no reasonable prospect to include the area in the 30 year Mine Plan. Against this background, Marula has investigated opportunities to empower the local community. Marula has therefore proposed to the Hackney community that it applies for a preferential community right (in terms of Section 104 of the MPRDA). Accordingly, the Hackney community has expressed their interest and intent to apply over the said Hackney prospecting right area.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Marula to manage the environmental authorisation processes associated with Marula's closure of the prospecting right.

PURPOSE OF THIS REPORT

This Basic Assessment Report (BAR) has been compiled and distributed for review and comment as part of a Basic Assessment (BA) process that is being undertaken for the closure of the Hackney Prospecting Right, near Burgersfort in the Limpopo Province.

This BAR provides a description of the proposed closure project and the affected environment; summarises the BA process followed to date; presents to a closure plan for the project; identifies and assesses the key impacts associated with the decommissioning and closure of the prospecting right and presents management and mitigation measures.

Interested and Affected Parties (I&APs) are asked to comment on the BAR (see Section below). The document will then be updated into a final report, giving due consideration to the comments received. The BAR will be submitted to the DMR for consideration as part of the closure application in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) (MPRDA), as amended and application for Environmental Authorisation in terms of Chapter 5 of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA), as amended.

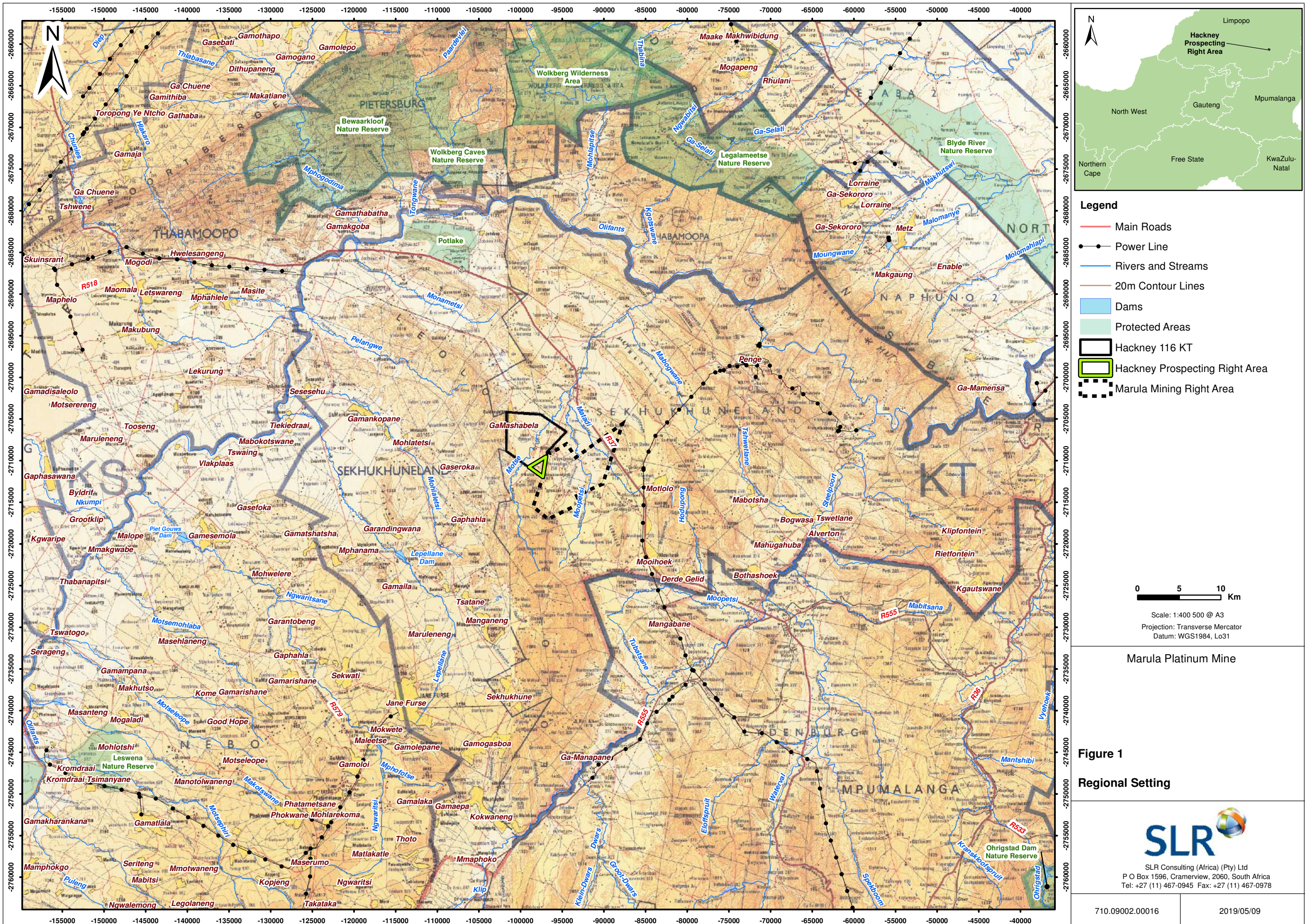
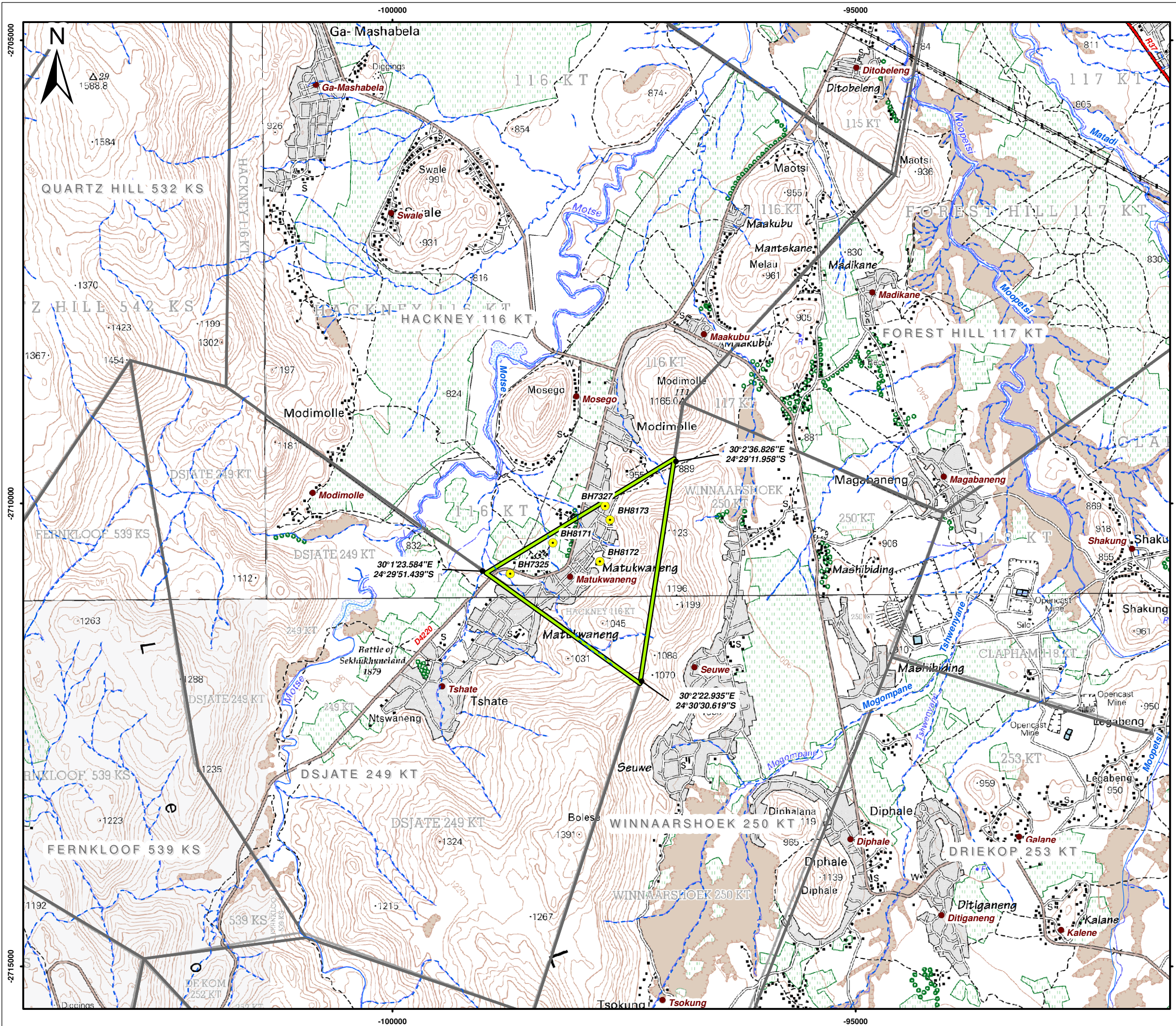


Figure 1

Regional Setting



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- Legend**
- Hackney Prospecting Right Area
 - Villages / Towns
 - Main Roads
 - Power Line
 - Rivers and Streams
 - 20m Contour Lines
 - Farms
 - Drill Sites

Co-Ords for Drilled Boreholes

BH7325	30°1'33.394"E	24°29'51.659"S
BH7327	30°2'10.056"E	24°29'27.973"S
BH8171	30°1'49.906"E	24°29'40.95"S
BH8172	30°2'7.964"E	24°29'47.483"S
BH8173	30°2'11.862"E	24°29'32.895"S

0 500 1 000 Meters
 Scale: 1:40 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mine

Figure 2
Local Setting

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SUMMARY OF AUTHORISATION REQUIREMENTS

Prior to the closure of the prospecting right, the following is required:

- A Closure Certificate from the DMR in terms of Section 43(4) of the MPRDA.
- An environmental authorization from the DMR in terms of the NEMA, as amended. The Environmental Impact Assessment (EIA) Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended. The relevant listed activities are included in Section 3.1.

TERMS OF REFERENCE

SLR, as the independent EAP, is responsible for undertaking the required environmental regulatory process and conducting the public participation process. The terms of reference for the environmental regulatory process are to:

- Make application for Environmental Authorisation of the project in terms of NEMA.
- Make application for the Closure of the proposed project in terms of the MPRDA.
- Ensure the BA is undertaken in accordance with the requirements of NEMA and the EIA Regulations 2014 (as amended) as well as the MPRDA.
- Ensure the BA is undertaken in an open, participatory manner to ensure that all potential impacts are identified.
- Undertake a formal public participation process, which includes the distribution of information to I&APs and provides the opportunity for I&APs to raise any concerns/issues, as well as an opportunity to comment on all BA documentation.
- Integrate all information, including the findings of the specialist studies and other relevant information, into a BAR to allow an informed decision to be taken on the proposed project.

Further to this and in accordance with Appendix 1 of the EIA Regulations 2014 (as amended), the objectives of a BA process are to:

- Determine the policy and legislative context within which the proposed activity is located and how the activity complies with and responds to the policy and legislative context.
- Identify the alternatives considered, including the activity, location, and technology alternatives.
- Describe the need and desirability of the proposed alternatives.
- Through the undertaking of an impact and risk assessment process inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine:
 - (i) The nature, significance, consequence, extent, duration, and probability of the impacts occurring.
 - (ii) The degree to which these impacts can be reversed, may cause irreplaceable loss of resources; and can be avoided, managed or mitigated.
- Through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to:
 - (i) Identify and motivate a preferred site, activity and technology alternative.
 - (ii) Identify suitable measures to avoid, manage or mitigate identified impacts.
 - (iii) Identify residual risks that need to be managed and monitored.

This BA process consists of a series of steps to ensure compliance with these objectives and the EIA Regulations (2014). The process involves an open, participatory approach to ensure that all impacts are identified and that decision-making takes place in an informed, transparent and accountable manner.

OPPORTUNITY TO COMMENT

This BAR has been distributed for a 30 day comment period from **17 May 2019 to 19 June 2019** in order to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the BA process.

Copies of the full report have been made available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and at the Marula Platinum (Pty) Ltd Mine Offices. Electronic copies (compact disk) of the report are available from SLR, at the contact details provided below.

All comments received during the review process will be addressed in the BAR that is submitted for decision-making.

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PART A – SCOPE OF ACTIVITY AND ENVIRONMENTAL IMPACT ASSESSMENT

1 DETAILS OF THE APPLICANT AND THE EAP

1.1 APPLICANT DETAILS

The applicant for the project is Marula Platinum (Pty) Ltd (Marula). Details are provided in Table 1 below.

TABLE 1: APPLICANT DETAILS

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Address:	Marula Platinum Mine, Steelpoort, Limpopo
Contact No.	066 486 6682
Responsible person:	Murendeni Makhado

1.2 DETAILS OF THE EAP WHO PREPARED THE REPORT

As noted in Chapter 1, SLR has been appointed as the independent EAP to undertake the BA for the proposed closure of the prospecting right. The details of the EAP project team that are undertaking this BA are provided in Table 2.

SLR has no vested interest in the proposed project other than fair payment for consulting services rendered as part of the BA process and has declared its independence as required by the EIA Regulations 2014 (as amended). An undertaking by SLR is provided in Section 17.

TABLE 2: DETAILS OF THE BA PROJECT TEAM

General		
Organisation	SLR Consulting (Africa) (Pty) Ltd	
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Stephen van Niekerk (SLR)	Closure plan and financial provision reviewer	svanniekerk@slrconsulting.com
Caitlin Hird (SLR)	Management of the BA process, including public consultation, process review, specialist study review and report compilation	chird@slrconsulting.com
Clive Phashe (SLR)	Project assistant and public consultation	cphashe@slrconsulting.com

1.3 EXPERTISE OF THE EAP

Caitlin Hird holds an Honours degree in Geography and Environmental Management and has approximately nine years of relevant experience. Alex Pheiffer holds an MSc degree in Environmental Management and is registered as a professional natural scientist (Environmental Management) with the South African Council for Natural Scientific Professions (SACNASP) (Appendix B). Alex Pheiffer has over 16 years of relevant experience. Both Caitlin Hird and Alex Pheiffer have been involved in several impact assessments for large scale mining developments in Southern Africa. Clive Phashe holds a Bachelor of Science in Life and Environmental Sciences from the University of Johannesburg. Clive has over a year's experience within the environmental consulting field. Clive has assisted in a variety of mining projects since joining the company. Relevant curricula vitae (including proof of registrations) are attached in Appendix B.

2 LOCATION OF ACTIVITY

2.1 LOCATION OF OVERALL ACTIVITY

A description of the property on which the proposed project is located is provided in Table 3.

TABLE 3: DESCRIPTION OF THE PROPERTY

Description	Details
Farm Name	A portion of the farm Hackney 116 KT.
Closure application area (ha)	The prospecting right area covers 223ha.
Magisterial district	The mine is located within the Sekhukhune District Municipality.
Distance and direction from nearest town	The project area is located approximately 35km north west of the town Burgersfort (Refer to Figure 1).
21 digit Surveyor General Code for each farm portion	The farm Hackney 116 KT - T0KT0000000011600000 (the prospecting right covers only the southern portion of the farm).
Triangular Co-ordinates (Refer to Figure 2)	North: 30°2'36.826"E and 24°29'11.958"S South: 30°2'22.935"E and 24°30'30.619"S West: 30°1'23.584"E and 24°29'51.439"S

2.2 LOCALITY MAP

The regional and local settings are illustrated in Figure 1 and Figure 2, respectively.

3 DESCRIPTION OF THE SCOPE OF THE ACTIVITY

This chapter lists the applicable listed activities and provides general information on the proposed project and a description of the proposed closure of the prospecting right.

3.1 LISTED AND SPECIFIED ACTIVITIES

The proposed project triggers a listed activity for which authorisation, is required in terms of the NEMA. The associated listed or specified activity is summarised in the table below. The legislative context pertaining to the listed activity is outlined in Section 4.

TABLE 4: PROJECT ACTIVITIES AND ASSOCIATED LISTED ACTIVITIES

Description of the proposed project activity	Aerial extent of the activity (ha)	Listed activity (mark with an x)	Listed activity number, applicable listing notice and activity description
Closure of already decommissioned prospecting activities (which include drill sites, contractor's office/ camp sites/ storage areas, access tracks). It should be noted that no drilling or related activities have taken place since 2012.	Approximately 223 ha (extent of the prospecting right area)	X	<p>Activity 22 of Listing Notice 1 (GNR 983)</p> <p>The decommissioning of any activity requiring –</p> <p>(i) a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002); but excluding the decommissioning of an activity relating to the secondary processing of a –</p> <p>(a) mineral resource, including the smelting, beneficiation, reduction, refining, calcining or gasification of the mineral resource; or</p> <p>(b) petroleum resource, including the refining of gas, beneficiation, oil or petroleum products; –</p> <p>in which case activity 31 in this Notice applies.</p> <p>"Decommissioning" is defined as 'to take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned'.</p> <p>Given that the prospecting facilities have been dismantled and will be closed (a closure certificate is required in terms of Section 43 of the MPRDA) this activity is deemed applicable.</p>

3.2 DESCRIPTION OF THE PROSPECTING ACTIVITIES

3.2.1 Overview of prospecting activities

Prospecting activities undertaken in 2007 and 2012 included:

- Use of existing roads/ tracks (as far as possible).
- Establishment and use of new access tracks.
- Establishment and use of temporary contractor's camp (caravans, chemical toilets etc.).
- Establishment and use of support facilities (water, waste and fuel storage areas, digging and lining of sumps etc.).
- Drilling of five approved boreholes (BH7325 and BH7327 drilled in 2007; and BH8171, BH8172 and BH8173 drilled in 2012) as shown in Figure 2.

3.2.2 Decommissioning and rehabilitation of disturbed areas

Active phase

Decommissioning and rehabilitation took place immediately after exploration work at each drill site was completed. This usually took between one and three days. Decommissioning and rehabilitation activities at each site included the following steps:

- Removal of all equipment, structures and materials.
- Removal of any waste and disposal at an appropriately permitted waste site.
- Sealing and capping of all boreholes and installation of a 0.8 x 0.8 x 0.8 m concrete block and stand pipe for easy identification.
- Replacing and levelling topsoil (where removed).
- Scarifying/ripping areas where soils have been compacted.
- Areas were left to naturally re-vegetate.

These steps were based on the regulatory requirements for rehabilitation of the prospecting sites as detailed in the approved EMPr (see text box below for an outline of the rehabilitation commitments). It should be noted that at the time of compiling the prospecting EMP, the DMR's standard EMP format was relevant.

Rehabilitation commitments as detailed in the approved EMPr (dated 10 October 2006):

- *The environment affected by the prospecting operations shall be rehabilitated by the holder, as far as is practicable, to its natural state or to a predetermined and agreed to standard or land use which conforms with the concept of sustainable development;*
- *The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof;*
- *Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre-prospecting situation;*
- *Roads shall be ripped or ploughed, and if necessary, appropriately fertilised (based on a soil analysis) to ensure the regrowth of vegetation. Imported road construction materials which may hamper regrowth of vegetation must be removed and disposed of in an approved manner prior to rehabilitation. If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification;*
- *Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped. The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora. If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation be corrected and the area be seeded with a vegetation seed mix to his or her specification;*
- *All infrastructure, equipment and other items used during the prospecting period will be removed from the site;*
- *Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the prospecting area and disposed of at a recognised landfill facility. It will not be permitted to be buried or burned on the site; and*
- *Final rehabilitation shall be completed within a period specified by the Regional Manager.*

Passive phase - Aftercare and maintenance

Typically a period of aftercare and maintenance is applied to each rehabilitated drill site to ensure closure objectives are being met. Given the nature of the prospecting activities, a 2 to 3 year period of maintenance and aftercare is usually applied.

For drill sites BH7325 and BH7327 (drilled in 2007), the aftercare and maintenance activities included the monitoring of erosion and vegetation establishment and control and eradication of alien invasive plants. For drill sites BH8171,

BH8172 and BH8173 drilled in 2012, a period of aftercare and maintenance could not be applied due to access to the drill sites being denied, by the community.

3.2.3 A summary of progressive rehabilitation and current status of the disturbed areas

Progressive rehabilitation took place as prospecting activities advanced. Rehabilitation commenced as each drill site was completed and decommissioned. Rehabilitation activities were aligned with Marula's approved EMPr and closure objectives, and included the activities outlined in Section 3.2.2 above.

Based on findings from previous EMP performance assessments undertaken in 2013 and 2017, at the time of the assessments drill sites BH7325 and BH7327 had fully re-vegetated and no further work was required by Marula. The re-vegetation of drill sites BH8171, BH8172 and BH8173 was still in progress. The final EMP Performance Assessment has been completed as part of this submission. Further detail on progressive rehabilitation and the current status of disturbed areas is included in the final EMP Performance Assessment in Section 8.2.



- Legend**
- Villages / Towns
 - Secondary Roads
 - Perennial Rivers
 - - - Non-Perennial Rivers
 - Drill Sites
 - ▭ Hackney Prospecting Right Area

Co-Ords for Drilled Boreholes

BH7325	30°1'33.394"E	24°29'51.659"S
BH7327	30°2'10.056"E	24°29'27.973"S
BH8171	30°1'49.906"E	24°29'40.95"S
BH8172	30°2'7.964"E	24°29'47.483"S
BH8173	30°2'11.862"E	24°29'32.895"S

0 100 200 Meters
 Scale: 1:10 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mine

Figure 3
Layout of Decommissioned Prospecting Drill Sites

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4 POLICY AND LEGISLATIVE CONTEXT

This chapter outlines the key legislative requirements applicable to the proposed project and outlines the guidelines, policies and plans that have been taken into account during the BA process.

4.1 LEGISLATIVE CONSIDERATION IN THE PREPARATION OF THE BASIC ASSESSMENT REPORT

In accordance with the EIA Regulations 2014 (as amended) and the DMR BAR template requirements, all legislation and guidelines that have been considered in the BA process must be documented. Table 5 below provides a summary of the applicable legislative context.

TABLE 5: LEGAL FRAMEWORK

Applicable legislation and guidelines used to compile the report	Reference where applied	How does this development comply with and respond to the policy and legislative context?
Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA), as amended and supporting Regulations	Introduction and Table 7	An outline of the legislation is presented in Section 4.1.1. The project will require a closure certificate.
National Environmental Management Act (No. 107 of 1998) (NEMA), as amended and 2014 EIA Regulations, as amended	Introduction, Section 3.1, and Table 7	An outline of the legislation is presented in Section 4.1.2. The project will need to comply with the principles of NEMA. The project also triggers a listed activity.
Financial Provisioning Regulations, 2015 (GN 1147)	Section 18 and 27	A Financial Provision is required in line with the NEMA Regulations and is included in this report.
Alien Invasive Species Regulations GN 598 of 2014 in terms of the NEM:BA	Section 0 and 7.4.1	These regulations have been used to inform the rehabilitation status of the site.
Alien and Invasive Species List, GN 864 of 2016		
National Heritage Resources Act (No 25 of 1999).		

4.1.1 Mineral and Petroleum Resources Development Act, 2002 and Regulations (No. 28 of 2002)

The Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA) governs the acquisition, use and disposal of mineral and petroleum resources. Section 43 of the MPRDA governs the issuing of a closure certificate. In this regard, the holder of a prospecting right remains responsible for any environmental liability, pollution, ecological degradation, the pumping and treatment of extraneous water, compliance to the conditions of the environmental authorisation and the management and sustainable closure thereof, until the Minister has issued a closure certificate in terms of the Act to the holder of the prospecting right.

Upon the lapsing, abandonment or cancellation of the right the holder of a prospecting right must apply for a closure certificate.

No closure certificate may be issued unless:

- The Council for Geoscience has confirmed in writing that complete and correct prospecting reports in terms of Section 21(1) of the MPRDA have been submitted to the Council for Geoscience.
- The complete and correct records, borehole core data or core-log data that the Council of Geoscience may deem relevant, have been lodged with the Council for Geoscience. OR
- In the case of the holder of a permit or right, the complete and correct surface and the relevant underground geological plans have been lodged with the Council for Geoscience.

Regulation 57 of the Mineral and Petroleum Resources Development Regulations details the requirements for applying for closure certificates by a holder of a prospecting right.

In this regard a closure application must be accompanied by:

- A closure plan contemplated in Regulation 62.
- An environmental risk report contemplated in Regulation 60.
- A final performance assessment report contemplated in Regulation 55(9).
- A completed application form contemplated in Regulation 57.

The proposed project is for the closure of a prospecting right. In this regard, the project requires a closure certificate in terms of Section 43 of the MPRDA, and therefore an application as contemplated in Regulation 57 is required in order for the DMR to consider closure of the prospecting site. This information has been included in this report.

In addition the regulations define the following terms:

- Residual environmental impact – means the environmental impact remaining after a closure certificate has been issued.
- Latent environmental impact – means any environmental impact that may result from natural events or disasters after a closure certificate has been issued.

4.1.2 National Environmental Management Act, 1998

The National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA), as amended, establishes principles and provides a regulatory framework for decision-making on matters affecting the environment. All organs of state must apply the range of environmental principles included in Section 2 of NEMA when taking decisions that significantly affect the environment. Included amongst the key principles is that all development must be socially, economically and environmentally sustainable and that environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably. The participation of I&APs is stipulated, as is that decisions must take into account the interests, needs and values of all I&APs.

Chapter 5 of NEMA provides a framework for the integration of environmental issues into the planning, design, decision-making and implementation of plans and development proposals. Section 24 provides a framework for granting of environmental authorisations. To give effect to the general objectives of Integrated Environmental Management, the potential impacts on the environment of listed or specified activities must be considered, investigated, assessed and reported on to the competent authority. Section 24(4) provides the minimum requirements for procedures for the investigation, assessment, management and communication of the potential impacts.

In terms of the management of impacts on the environment, Section 24N details the requirements for an EMPr.

EIA Regulations 2014

The EIA Regulations, 2014 (as amended by GN No. 326 of 7 April 2017) promulgated in terms of Chapter 5 of NEMA provide for control over certain listed activities. These listed activities are detailed in Listing Notice 1 (as amended by GN No. 327 of 7 April 2017), Listing Notice 2 (as amended by GN No. 325 of 7 April 2017) and Listing Notice 3 (as amended by GN No. 324 of 7 April 2017). The undertaking of activities specified in the Listing Notices is prohibited until Environmental Authorisation has been obtained from the competent authority. Such Environmental Authorisation, which may be granted subject to conditions, will only be considered once there has been compliance with the EIA Regulations, 2014.

The EIA Regulations, 2014 (as amended) set out the procedures and documentation that need to be complied with when applying for Environmental Authorisation. The proposed project triggers an activity listed in Government GN 983 (Listing Notice 1; as amended) (refer to Table 4) and therefore a BA process is required in order for the DMR to consider the application in terms of NEMA.

Since the proposed project is for the closure of a prospecting right, a closure plan and an environmental audit report are required in terms of Appendix 5 and 7 of the EIA Regulation, respectively.

4.2 GUIDELINES, POLICIES, PLANS AND FRAMEWORKS

The guidelines, policies and plans listed in Table 6 have been taken into account during the BA process, where applicable.

TABLE 6: GUIDELINE AND POLICY FRAMEWORK

Guideline	Governing body	Relevance
Public participation guideline in terms of NEMA (2017)	Department of Environmental Affairs	The purpose of this guideline is to ensure that an adequate public participation process is undertaken during the BA process.
Guideline on need and desirability (2017)		This guideline informs the consideration of the need and desirability aspects of the proposed project.
Planning for Integrated Mine Closure: toolkit; International Council on Mining and Metals	International Council on Mining and Metals	Toolkit to assist in making decisions based on consideration of closure aspects in a holistic manner.
The Greater Tubatse Integrated Development Plan 2016-2021	Greater Tubatse Local Municipality	The Greater Tubatse Local Municipality and Sekhukhune District Municipality Integrated Development Plans are the principle strategic instruments guiding all planning, management, investment and development within the province in order to provide best solutions towards sustainable development.
Sekhukhune District Municipality Final Integrated Development Plan 2016-2021	Sekhukhune District Municipality	

4.3 LEGISLATIVE BAR CONTENT REQUIREMENTS

This document has been prepared in accordance with the DMR BAR template format, and was informed by the guidelines posted on the official DMR website. This is in accordance with the requirements of the MPRDA. This report also complies with the requirements of the NEMA and Appendix 1 and Appendix 4 of EIA Regulations 2014, as amended (GN 982). Table 7 provides a summary of the requirements, with cross references to the report sections where these requirements have been addressed.

Regulation 19(7) of the EIA Regulations 2014 notes that the content of a closure plan may be combined with the content of an EMPr on condition that the requirements of both Appendices 5 and 4, respectively, are met. In addition the closure plan must comply with the requirements of Regulation 62 of the MPRD Regulations. These requirements, with cross references to the report sections where these requirements have been addressed are included in Table 7 and Table 8 below.

TABLE 7: CONTENTS OF THE BAR

BAR requirement as per the DMR template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
Part A of DMR report template	Appendix 1 of the NEMA regulations, as amended	Section/Appendix
Details of the EAP.	Details of the EAP who prepared the report.	Section 1.2.
Expertise of the EAP.	Details of the expertise of the EAP, including curriculum vitae.	Section 1.3 and Appendix B.
Location of overall activity.	The location of the activity, including - the 21 digit Surveyor General code of each cadastral land parcel. Where available the physical address and farm name. Where the required information is not available, the coordinates of the boundary of the property or properties.	Section 2
Locality plan.	A plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken	Section 2.

BAR requirement as per the DMR template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
	or on land where the property has not been defined, the coordinates within which the activity is to be undertaken.	
Description of the scope of the proposed overall activity.	A description of the scope of the proposed activity, including all listed and specified activities triggered. A description of the activities to be undertaken, including associated structure and infrastructure.	Section 3.
Policy and legislative context.	A description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context.	Section 4.
Need and desirability of the proposed activity.	A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location.	Section 5.
Motivation for the overall preferred site, activities and technology alternative.	A motivation of the preferred development footprint within the approved site including.	Section 6.
A full description of the process followed to reach the proposed development footprint within the site.	A full description of the process followed to reach the proposed development footprint within the approved site.	Section 7.
Details of the development footprint alternatives considered.	Details of all the alternatives considered.	Section 7.1.
Details of the public participation process followed.	Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs.	Section 7.2.
Summary of issues raised by I&APs.	A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them.	Section 7.3.
Environmental attributes associated with the alternatives.	The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	Section 7.4.
Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts including the degree of the impacts.	The impacts and risks identified, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources and can be avoided, managed and mitigated.	Section 7.5.
Methodology used in determining the nature, significance, consequence, extent, duration and probability of potential environmental impacts and risks.	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks.	Section 7.6.
The positive and negative impacts that the proposed activity (in terms of the initial site layout) and alternative will have on the environment and the community that may be affected.	Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	Section 7.7.
The possible management actions that could be applied and the level of risk.	The possible management actions that could be applied and level of residual risk.	Section 7.8.
Motivation where no alternative sites were considered.	The outcome of the site selection matrix. If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such.	Section 7.9.
Statement motivating the alternative development location within the overall site.	A concluding statement indicating the preferred alternatives, including preferred location within the approved site.	Section 7.10.
Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the	A full description of the process undertaken to identify, assess and rank the impacts the activity and associated structure and infrastructure will impose on the preferred	Section 8.

BAR requirement as per the DMR template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
preferred site (in respect of the final site layout) through the life of the activity.	location through the life of the activity including a description of all environmental issues and risks that were identified during the environmental impact assessment process and an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of management actions.	
Assessment of each identified potentially significant impact and risk.	An assessment of each identified potentially significant impact and risk including cumulative impacts, the nature, significant and consequence of the impact and risk, the extent and duration of the impact and risk, the probability of the impact and risk occurring, the degree to which the impact can be reversed, the degree to which the impact and risk may cause irreplaceable loss of a resources and the degree to which the impact and risk can be mitigated.	Section 9 and Appendix D.
Summary of specialist reports.	Where applicable the summary of the findings and recommendations of any specialist report complying with Appendix 6 of these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report.	Section 10.
Environmental impact statement.	An environmental impact statement which contains a summary of the key findings of the environmental impact assessment, a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers and a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.	Section 11.
Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr.	Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr.	Section 12.
Aspects for inclusion as conditions of authorisation.	Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	Section 13.
Description of any assumptions, uncertainties and gaps in knowledge.	A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and management actions proposed.	Section 14.
Reasoned opinion as to whether the proposed activity should or should not be authorised.	Reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.	Section 15
Period for which environmental authorisation is required.	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised.	Section 16.
Undertaking.	An undertaking under oath or affirmation by the EAP in relation to the correctness of the information provided in the reports, the inclusion of comments and inputs from stakeholders and I&APs, the inclusion of inputs and recommendations from the specialist reports where relevant and any information provided by the EAP to interested and affected parties and any responses by the EAP to comments	Section 17.

BAR requirement as per the DMR template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
	or inputs made by interested or affected parties.	
Financial provision.	Where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts.	Section 18.
Specific information required by the competent authority.	Any specific information required by the competent authority.	Section 19.
Other matter required in terms of section 24(4)(a) and (b) of the Act.	Any other matter required in terms of section 24(4)(a) and (b) of the Act.	Section 20.
Part B of the DMR report template	Appendix 4 of the NEMA regulations	Section/Appendix
Details of EAP.	Details of the EAP who prepared the EMPr and the expertise of that EAP to prepare the EMPr, including curriculum vitae.	Section 21.
Description of the aspects of the activity.	A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.	Section 22.
Composite map.	A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that any areas that should be avoided, including buffers.	Section 23.
Description of impact management objectives including management statements.	A description of the impact management objectives, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including planning and design, pre-construction activities, construction activities, rehabilitation of the environment after construction and where applicable post closure; and where relevant, operation activities.	Section 24.1.
Impacts to be mitigated in their respective phases.	-	Section 24.6
Impact management outcomes.	A description and identification of impact management outcomes required for the aspects contemplated in paragraph.	Section 25
Impact management actions.	A description of proposed impact management actions, identifying the manner in which the impact management objectives and outcomes be achieved, and must, where applicable, include actions to avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation; comply with any prescribed environmental management standards or practices; comply with any applicable provisions of the Act regarding closure, where applicable comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable.	Section 26.
Financial provision.		Section 27.
Mechanism for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon.	The method of monitoring the implementation of the impact management actions.	Section 28.
	The frequency of monitoring the implementation of the impact management actions.	
	An indication of the persons who will be responsible for the implementation of the impact management actions.	
	The time periods within which the impact management actions must be implemented.	
	The mechanism for monitoring compliance with the impact management actions.	
	A program for reporting on compliance, taking into account	

BAR requirement as per the DMR template	BAR requirements as per the 2014 NEMA regulations, as amended	Reference in the EMPr report
	the requirements as prescribed by the Regulations.	
Environmental Awareness Plan.	An environmental awareness plan describing the manner in which the applicant intends to inform his or her employees of any environmental risk which may result from their work; and risks must be dealt with in order to avoid pollution or the degradation of the environment.	Section 30.
Specific information required by the competent authority.	Any specific information that may be required by the competent authority.	Section 31.
Undertaking.	-	Section 32.

TABLE 8: CONTENTS OF THE CLOSURE PLAN

MPRDA Closure Report Requirements as per Section 62 of MPRDA Regulations	NEMA Closure Report Requirements as per Appendix 5 of NEMA Regulations	Reference in the EMPr report
-	Details of the EAP who prepared the closure plan	Section 1.2
	The expertise of that EAP.	Section 1.3 and Appendix B
A description of the closure objectives and how these relate to the prospecting or mine operation and its environmental and social setting.	Closure objectives.	Section 24.1
A plan contemplated in regulation 2(2), showing the land or area under closure.	-	Figure 5
A sketch plan drawn on an appropriate scale describing the final and future land use proposal and arrangements for the site.		
A summary of the regulatory requirements and conditions for closure negotiated and documented in the environmental management programme or environmental management plan, as the case may be.	-	Section 27.1.3
-	Proposed mechanisms for monitoring compliance with and performance assessment against the closure plan and reporting thereon.	Section 28
A summary of the results of the environmental risk report and details of identified residual and latent impacts.	-	Section 24.6
A summary of the results of progressive rehabilitation undertaken.	Measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity and associated closure to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development, including a handover report, where applicable.	Section 3.2.3
A description of the methods to decommission each prospecting or mining component and the mitigation or management strategy proposed to avoid,	Information on any proposed avoidance, management and mitigation measures that will be taken to address the environmental impacts resulting from the undertaking of the closure activity.	Section 26

MPRDA Closure Report Requirements as per Section 62 of MPRDA Regulations	NEMA Closure Report Requirements as per Appendix 5 of NEMA Regulations	Reference in the EMPr report
minimize and manage residual or latent impacts.	<p>A description of the manner in which it intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation during closure; remedy the cause of pollution or degradation and migration of pollutants during closure; comply with any prescribed environmental management standards or practices; and comply with any applicable provisions of the Act regarding closure.</p> <p>The process for managing any environmental damage, pollution, pumping and treatment of extraneous water or ecological degradation as a result of closure.</p>	
Details of any long-term management and maintenance expected.	Time periods within which the measures contemplated in the closure plan must be implemented.	Section 26
A record of interested and affected persons consulted.	Details of all public participation processes conducted in terms of regulation 41 of the Regulations, including copies of any representations and comments received from registered interested and affected parties; a summary of comments received from, and a summary of issues raised by registered interested and affected parties, the date of receipt of these comments and the response of the EAP to those comments; the minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants; where applicable, an indication of the amendments made to the plan as a result of public participation processes conducted in terms of regulation 41 of these Regulations.	Section 7.2
Details of a proposed closure cost and financial provision for monitoring, maintenance and post closure management.	Where applicable, details of any financial provisions for the rehabilitation, closure and on-going post decommissioning management of negative environmental impacts.	Section 18 and 27
Technical appendices, if any.	-	-

5 NEED AND DESIRABILITY OF THE PROJECT

The DEA guideline on need and desirability (GNR 891, 20 October 2014) notes that while addressing the growth of the national economy through the implementation of various national policies and strategies, it is also essential that these policies take cognisance of strategic concerns such as climate change, food security, as well as the sustainability in supply of natural resources and the status of our ecosystem services. Thus, the over-arching framework for considering the need and desirability of development in general is taken at the policy level through the identification and promotion of activities / industries / developments required by civil society as a whole. The DEA guideline further notes that at a project level (as part of an EIA process), the need and desirability of the project should take into consideration the content of regional and local plans, frameworks and strategies.

5.1 ECOLOGICAL SUSTAINABLE DEVELOPMENT AND USE OF NATURAL RESOURCES

Due to the nature of prospecting projects being temporary and non-invasive, impacts on ecology/natural resources are possible, albeit that they are limited. The proposed closure of the Hackney prospecting right implies that Marula will not undertake further exploration activities in the area and in this regard, the land will be allowed to naturally re-vegetate and be used for pre-prospecting land uses (i.e. grazing of community livestock). The planned decommissioning and rehabilitation is therefore aligned with ensuring ecological sustainable development and use of natural resources.

5.2 PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT

Community/society priorities are officially expressed through public documents including the provincial growth and development strategy and spatial development framework documents. In this regard, the priorities of the Greater Tubatse Local Municipality and Sekhukhune District Municipality IDPs are focused around the reduction of unemployment by investing in key sectors and developing and upgrading basic service delivery and infrastructure. Although Marula's abandonment of the Hackney prospecting right precludes Marula's future mining of that area, this does allow for new third party applications to be lodged with the DMR. Marula has investigated opportunities to empower the local community and has proposed to the Hackney community that it applies for a preferential community right (in terms of Section 104 of the MPRDA). The Hackney community has accordingly expressed their interest and intent to apply over the said Hackney prospecting right area. This has the potential for economic benefits to be realised by the Hackney community thereby aligning with the planned growth and development objectives contained in the IDPs.

5.3 RATIONALE FOR THE PROPOSED PROJECT ACTIVITY

Marula does not have access to the Hackney 116 KT prospecting area, and is not able to continue with prospecting activities. A Board decision was taken to discontinue (abandon) prospecting activities and exit from the Hackney project. Abandoning the prospecting right allows for new third party applications to be lodged with the DMR.

6 MOTIVATION FOR THE PREFERRED SITE, ACTIVITIES AND TECHNOLOGY ALTERNATIVES

The proposed project is the closure of a prospecting right associated with a specific area. Decommissioning activities have been completed. This section is therefore not applicable. Refer to Section 7.1 for further detail.

7 FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ALTERNATIVES WITHIN THE SITE

7.1 DETAILS OF THE DEVELOPMENT FOOTPRINT CONSIDERED

This report is in support of a closure application for a prospecting right and therefore development footprint alternatives (relating to site, activity or technology) are not applicable.

7.1.1 The “no-go” alternative

The “no-go” alternative would mean that the Hackney prospecting right would not be closed and the status quo would remain (i.e. for Marula to retain the prospecting right, but for no prospecting activities to be undertaken).

7.2 DETAILS OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED

This section describes the public participation process undertaken during the BAR process. The public participation process was undertaken in accordance with the requirements of Chapter 6 of Regulations 982 of 4 December 2014 (EIA Regulations), as amended. In addition to this, consideration was also given to the public participation guideline in terms of the NEMA (2017) and the consultation requirements under MPRDA.

7.2.1 Public Participation Process undertaken to date

A public participation process is being undertaken to inform the BA process and included consideration of the Closure Plan consultation requirements in terms of the MPRDA and NEMA EIA Regulations. A record of the public participation process undertaken is outlined in Table 9 below. The purpose of the public participation process was to notify landowners, land users and other key stakeholders of the proposed project and to provide them with the opportunity to raise any initial issues or concerns regarding the proposed project. Supporting documentation is presented in Appendix C.

TABLE 9: PUBLIC PARTICIPATION PROCESS UNDERTAKEN AS PART OF THE BAR

Steps	Details
DMR Pre-application meeting	<p>A pre-application meeting was held with the DMR in Polokwane on 10 April 2019. The purpose of the meeting was:</p> <ul style="list-style-type: none"> - To provide information pertaining to the project - To outline the motivation for the proposed closure - To provide an overview of the environmental process relevant to the project - To provide an overview of the existing status of the environment - To outline and obtain input on the potential environmental/cultural impacts - To outline and obtain input on the planned public participation process. <p>A copy of the pre-application meeting minutes is included in Appendix C.</p>
Notification of the land claims commissioner	<p>The land claims commissioner was consulted in order to verify the status of land claims on the farm Hackney 116 KT. The proof of correspondence is attached in Appendix C.</p>
I&AP database	<p>A database was compiled with input from the Marula stakeholder engagement team and is being updated on an on-going basis for the duration of the project. The I&AP database identified and included landowners, land users and lawful occupiers within the prospecting right area, as well as those immediately adjacent to the projecting right area. In addition the database included surrounding I&APs, industry, mines and non-governmental organisations (NGOs), and regulatory authorities. All stakeholders registered on the database received a copy of the Background Information Document (BID), SMS notification of the proposed project and are being notified that the BAR is available for public and regulatory authority review and comment. Landowner, land user, commenting authorities and other I&AP</p>

	details were verified through a deedsearch and/or telephonic discussions. The database is included in Appendix C.
Call with Hackney Chief Kgoshi Mashabela	On 26 April 2019, SLR was able to make telephonic contact with the Hackney Chief (Kgoshi Mashabela) to notify him of the project. A telephonic record has been included in Appendix C.
Background Information Document (BID)	<p>A BID (in English and Sepedi) was compiled by SLR and distributed to I&APs and commenting authorities registered on the project database. In addition the BID was made available at the mine. The BID provided:</p> <ul style="list-style-type: none"> - Information about the proposed prospecting right closure. - Information about the baseline environment of the prospecting right area - Information about the environmental assessment process (Basic Assessment Process). - Information regarding possible environmental/cultural impacts. - Information on how I&APs and commenting authorities can have input into the environmental assessment process. <p>A registration and response form was attached to the BID, which provided I&APs with an opportunity to register as an I&AP and submit comments on the proposed project. Copies of the BID in English and Sepedi are included in Appendix C.</p>
Site notices	SLR placed laminated site notices (in English and Sepedi) along the D4220 road within the prospecting right area. Photographic proof is included in Appendix C. A map illustrating the location of the site notices is also included in Appendix C.
Newspaper advertisements	A block advertisement was placed in the Steelburger newspaper on 19 April 2019. A copy of the advertisement is included in Appendix C.

Approximately seven written submissions were received from I&APs during the public participation process (see Appendix C).

In addition, Marula has also engaged directly with members of the Djate/Modimolle/Matukwaneng community residing on the farm Hackney 116KT. Proof of this consultation (meeting minutes and emails) has been included in Appendix C.

TABLE 10: I&APS THAT SUBMITTED WRITTEN/TELEPHONIC CORRESPONDENCE DURING THE PROCESS

State Departments and Organs of State	Hackney 116 KT Farm
Commission on Restitution of Land Rights: Limpopo (by email on 02 April 2019)	Kgoshi Mashabela (telephone call on 26 April 2019)
Tjate village on the farm Dsjate 249KT – adjacent to the Hackney PR area	General I&APs
Abram Lapatla (by email on 26 and 29 April, and 03 May 2019)	Given Ngobeni (by email on 02 May 2019)

7.2.2 Review of the BAR

The BAR has been made available for commenting authority and I&AP review and comment for 30 days. Summaries of the BAR (in English and Sepedi) have been made available to all I&APs registered on the I&AP database (via email) and hard copies of the summary document are available at the Marula Platinum Mine offices. In addition, I&APs have been notified that the BAR and/or summary is available for review via SMS. An electronic copy of the BAR has been made available on the SLR website.

Commenting authorities will either receive both an electronic copy and a hard copy of the BAR.

7.2.3 Completion of the BAR

Following closure of the BAR commenting period, all comments received will be incorporated and responded to in a Comments and Responses Report. Where required the BAR will be updated to address comments received. The final report including I&AP comments will be submitted to DMR for consideration and decision-making. Registered I&APs will receive notification of the final submission to DMR.

After the DMR has reached a decision, registered I&APs will be notified of the outcome of the application, the reasons for the decision and details of the appeal process.

7.3 SUMMARY OF ISSUES RAISED BY I&APS

All written comments received have been collated and responded to in a Comments and Responses Table (see Table 11 below). Full comments are included in Appendix C.

In summary, issues raised related mainly to dissatisfaction with Marula and the public participation process. This was to be expected given the historically difficult relationship between Marula and the Djate/Modimolle/Matukwaneng community residing on the farm Hackney 116KT. In order to provide context to the written submissions, proof of direct consultation between Marula and the above stakeholders has been included in Appendix C.

TABLE 11: SUMMARY OF ISSUES RAISED BY I&APS

Interested and affected party	Date comment received	Issues raised	Response provided by SLR (unless otherwise indicated)	Reference in report where issues & or responses were incorporated
Regulatory department				
Land Claims Commissioner: Limpopo				
Commission on Restitution of Land Rights: Limpopo	By email on 02 April 2019	Your enquiry dated 27 March 2019 has reference and is acknowledged. Kindly take note that there is a restitution land claim lodged prior to 1998 by the Roka Mashabela Tribe. The research report has been approved and is currently under investigation.	This information was used to inform the public participation process, by ensuring that land claimants were notified of the project.	Appendix C
General I&APs				
Given Ngobeni	By email on 02 May 2019	Can you please register me to form the part of public participation process.	Given Ngobeni's email address was added to the stakeholder database to ensure that he is notified when the draft Basic Assessment Report is available for public review. Given was also provided with a copy of the Background Information Document in English and Sepedi.	Appendix C
Abram Lapatla (Tjate village)	By email on 26 April 2019	I'm Mr Abram Lapatla Kopotja from Tjate village. I form part of Hackney farm 116KT community. I have interest to be part of your public participation about Marula mine closing application. I will attend with members of Hackney development committee we are twelve in numbers. But we are also very surprised to see this papers of closing application, but your company not contacting the committee is very wrong to do so. My contact 0735764198 or Berry Mohlala 07300302244 (via email on 26 April 2019).	Abram Lapatla's email address was added to the stakeholder database to ensure that he is notified when the draft BAR is available for public review. Abram was also provided with a copy of the BID in English and Sepedi. SLR explained that they had tried to make contact with Kgoshi Mashabela since 16 April 2019, however was only able to reach him on 26 April 2019. SLR further explained that the site notices had been placed as a legal requirement (in accordance with the requirements of Chapter 6 of the Environmental Impact Assessment Regulations (GNR 982 of 2017) 2014) to notify the community of the planned closure of the prospecting right and to invite stakeholders to provide input into the public participation process.	Appendix C
		Thanks for replying you were not supposed to talk to Kgoshi Mashabela alone, what about Tjate community. Talk to Marula mine to provide you with memorandum of understanding and the names of the current committee I'm the one of them and we are not happy the way you do things. This is brotherly advice. Is not only kgoshi being affected please do the right thing we need to meet you.		Appendix C
	By email on 29 April	Our worries is that before you continue with public participation why you not consult the affected communities to be aware of what Marula planning for		Appendix C

Interested and affected party	Date comment received	Issues raised	Response provided by SLR (unless otherwise indicated)	Reference in report where issues & or responses were incorporated
	2019	you just paste the papers without informing the committee that it will be false public participation please do the right thing ask Marula that were you can find the leaders.	Contrary to Mr Lapatla’s assertions regarding the public participation process not being appropriately undertaken, it should be noted that Marula has engaged directly with Mr Lapatla via email and also during a meeting (in September 2018) held between Marula and these stakeholder committees. During this engagement, Marula advised the committees of its intention to walk away from the part of the Hackney farm covered by Marula’s prospecting right. In this meeting, Marula also explained that its closure of the Hackney prospecting right would make it available for the community to apply for a preferential community right (in terms of Section 104 of the MPRDA). Mr Lapatla was present at this meeting and also interacted telephonically with Marula to outline the community’s intent to apply for the abovementioned preferential community right. Proof of direct engagement between Marula and these committees is included in (Marula).	
	By email on 3 May 2019	Good afternoon Sir. Tjate community the most affected community is worrying because they want to be part of the public participation and Tjate tribal council expect them and send their acknowledge letter to the some email address. And please do not forget to address our concerns about the way you just posting the papers on our poles without informing the leaders because we were left out side of your process you were inviting poles not the people we are not sangomas or prophet to know that you were the right company and we have questions to ask.		Appendix C
		We waiting acknowledgement letter of Tjate community, hackney development committee, Tjate development committee, Tjate development forum, Tjate tribal council you can invite them on all letter they will received it on this email address abramlepatla@gmail.com worrying community leaders about hackney farm116kt.		Appendix C
Chief Kgoshi Mashabela (Hackney community)	By telephone on 26 April 2019	I have seen the site notices placed in the area and have referred the matter to my attorneys.	SLR explained that the site notices had been placed as a legal requirement (in accordance with the requirements of Chapter 6 of the Environmental Impact Assessment Regulations (GNR 982 of 2017) 2014) to notify the community of the planned closure of the prospecting right and to invite stakeholders to provide input into the public participation process.	Appendix C

7.4 ENVIRONMENTAL ATTRIBUTES OF THE PROPOSED PROJECT AREA

Environmental attributes associated with the prospecting right area are presented in this section. This section has been informed by observations made by SLR during a drive-through of the broader prospecting right area in April 2019. In addition, where relevant, information from available reports (see reference list included in Section 33) has been used.

It was noted during the drive through that over-grazing by community livestock and general community activities have influenced the environmental attributes of the area.

7.4.1 Baseline environment affected by the proposed activity

Geology

The prospecting right area is underlain by the eastern limb of the Bushveld Igneous Complex (BIC). The BIC consists of two lithologically distinct units that are mainly intrusive into the Transvaal Supergroup: a lower sequence of layered mafic and ultramafic rocks, known as the Rustenburg Layered Suite (RLS), and an overlying unit of granites, known as the Lebowa Granite Suite. All the chromitite and platinum mineralisation is located in the RLS. During prospecting, Marula targeted the Merensky and UG2 reefs in order to evaluate the potential for future exploitation of platinum group metals (PGMs). Given the non-invasive nature of exploration drilling (when compared to mining), the geology baseline is expected to have been unaltered by prospecting activities.

Topography and surface water

The prospecting right area lies on the northern parts of the Leolo Mountains and its foothills and within the residential area of the Matukwaneng community. Gently undulating plains occur in the west (approximately 830 mamsl) with steeper gradients (1112 mamsl) in the east. The area is drained by several unnamed non-perennial tributaries of the Motse River (within quaternary catchment B71E) which flow in a north westerly direction. The confluence of the Motse and Olifants River is approximately 25 km downstream of the prospecting right area. The topography of the prospecting right area itself has been influenced by human activity. Prospecting activities were undertaken in the lower-lying areas of the landscape and drill sites are not located within proximity to any tributaries. As a result, the topography and related surface water runoff baselines are not expected to have been altered by prospecting activities. In addition, given the non-perennial nature of watercourses, the surface water quality baseline is not expected to have been altered by prospecting activities.

Climate

The prospecting right area experiences typical savannah climatic conditions namely hot and wet summers and cold and dry winters. Temperatures are mostly moderate, with a mean temperature of about 20°C. The prevailing wind direction is north-easterly and the wind speed varies from 15 to 25 km/hr. Extreme temperatures do occur in the area, with frost in winter and temperatures rising to above 40°C in summer. The mean annual rainfall is approximately 600 mm per annum. Rainfall and temperature affect the rate at which vegetation can re-establish, and given that that the prospecting right area has received on or above average rainfall during some years following the completion of drilling, it is expected that this would be adequate to support normal re-establishment of vegetation at the sites.

Soils and land capability

The soils overlying the prospecting right area are generally clayey (vertic/melanic) and are highly structured. Although these soils have a low yielding agricultural potential, in their natural state they could sustain substantial levels of crop production and grass for grazing. However this ability has been hampered by soil erosion and compaction resulting from over-grazing, community activities and the construction/upgrades of the D4220 road which runs through the prospecting right area. This has likely influenced the rate at which vegetation has re-established at the remaining drill sites and the current status of the rehabilitated areas.

Flora and fauna

The vegetation in the prospecting right area forms part of a regional complex type known as the Arid Northern Bushveld. The majority of the vegetation is severely transformed and typically encompasses secondary shrubland and grassland leading to a high incidence of bush encroachment and invasive weeds. The plant community on the hills and mountains are considered highly sensitive and some nationally threatened species may be associated with these hills, especially those along the western boundary of the prospecting right area. Two red data listed plant species (*Boscia foetida* subsp. *minima* and *Plinthus rehmarii*) may occur within the prospecting right area.

Very little evidence of wild faunal populations is associated with the broader area due to the presence of mining, prospecting, farming and community activities. It is however expected that surviving wildlife will be restricted to the Leolo Mountains which are sparsely populated and where human activities are restricted to cattle or game farming. In addition, the rocky outcrops and dongas associated with drainage lines in the area have been identified as being ecologically sensitive and may host some red data listed species. Prospecting activities were undertaken only in the lower-lying areas and therefore outside of ecologically sensitive areas. It is expected that the loss of flora and fauna within the prospecting right area has hampered the ability for vegetation to successfully re-establish at the drill sites.

Groundwater

The prospecting right area is underlain by two aquifers; namely a shallow, weathered aquifer (up to a depth of approximately 40m) and a deeper fractured rock aquifer. The average ground water level ranges from 14 to 70 metres below ground level (mbgl). In the broader area, groundwater quality is generally marginal to poor. Third party water users rely on groundwater for domestic and agricultural purposes. Given the non-invasive nature of exploration drilling, the groundwater baseline is expected to have been unaltered by prospecting activities.

Air quality

The regional ambient air quality has been influenced by surrounding mines, household fuel combustion and vehicle tailpipe emissions. Locally, ambient air quality is likely influenced by wind erosion from exposed surfaces, vehicle entrainment along roads, household fuel combustion and vehicle tailpipe emissions. The status of the rehabilitated sites would influence baseline air quality conditions, especially during the drier winter months.

Noise

The ambient noise environment is typical of a rural area with livestock, birds and human voices being the main sources of sound in the prospecting right area. Given the temporary nature of exploration drilling and that no prospecting activities are currently taking place or planned to take place, the noise baseline has remained unchanged.

Visual aspects

The prospecting right area lies in the northern parts of the Leolo Mountains and its foothills and within the residential area of the Matukwaneng community. Drilled sites are demarcated by a cement beacon and an upright standpipe and are visible from houses and communal areas within the immediate vicinity of the drill sites. The presence of these standpipes does not materially alter the visual landscape of the area which is dominated by the presence of the rural community, its support infrastructure (powerlines, roads etc.) and subsistence farming activities as well as the Leolo Mountain range.

Heritage/Cultural and palaeontological resources

Important historical beacons occur in the Leolo Mountain range including the Tsjate Provincial Heritage Site which overlaps with the prospecting right area (see Figure 6 in Appendix E). The Tsjate Provincial Heritage Site in particular is important to the history of South Africa and is protected by national legislation. It includes:

- The Modimolle mountain (considered to be holy).
- The Sefateng Poort through which Merensky and his followers fled from Sekhukhune.
- The remains of an Early Iron Age site.

No drill sites are located within proximity to the above listed heritage features. Given the non-invasive nature of exploration drilling and the presence of only a standpipe to mark the location of the drill sites, the heritage baseline is expected to have been unaltered by prospecting activities

It is possible that palaeontological resources (fossils) may occur in the superficial deposits of calcrete and sands. Given the non-invasive nature of exploration drilling, the palaeontological baseline is expected to have been unaltered by prospecting activities.

Socio-economic and current land uses

Land ownership details within and immediately adjacent to the prospecting right area are provided in the table below. This section should be read with reference to Figure 5 in Section 27 which shows the below farms' location relative to the prospecting right area.

The surface rights are owned by the South African government.

TABLE 12: LAND OWNERSHIP WITHIN AND IMMEDIATELY ADJACENT THE HACKNEY PROSPECTING RIGHT AREA

Portion	Landowner
Hackney 116 KT (Prospecting Right Area is over a portion of the farm)	
Portion 0	Republic of South Africa (represented by Department of Rural Development and Land Reform)
Dsjate 249 KT (Adjacent, to the south-west of Hackney 116 KT))	
Portion 0	South African Development Trust (represented by Department of Rural Development and Land Reform)
Winnaarshoek 250 KT (Adjacent, to the south and east of Hackney 116 KT)	
Portion 0	Government of Lebowa (Republic of South Africa) (represented by Department of Rural Development and Land Reform)
Forest Hill 117 KT (to the north-east of Hackney 116 KT)	
Portion 0	Republic of South Africa (represented by Department of Rural Development and Land Reform)

The Department of Rural Development and Land Reform (DRDLR) (Land Claims Commissioner) was contacted on 27 March 2019 to confirm the status of land claims on the farm Hackney 116KT. The Land Claims Commissioner has confirmed that there is a restitution land claim (lodged prior to 1998) by the Roka Mashabela Tribe. These claimants have been included in the I&AP database, and have been engaged. Proof of correspondence is included in Appendix C.

The prospecting right area covers a portion of the farm Hackney 116 KT. Within the prospecting right area is the community of Matukwaneng. Immediately adjacent and to the south east of the prospecting right area is the community of Tshate (on farm Dsjate 249 KT). Main land uses in the broader area relate to prospecting, mining, subsistence farming (livestock and cropping), and residential. The educational levels in the broader area are relatively low with a high level of unemployment and a dependency on subsistence agriculture, the public sector, and employment in the mining sector. Service provision (water, electricity, sanitation etc.) remains a challenge. The high economic dependency on subsistence scale agriculture has resulted in over-grazing of veld in the area. This has likely influenced the rate at which vegetation has re-established at the remaining drill sites and the current status of the rehabilitated areas.

7.4.2 Description of specific environmental features and infrastructure on the site

The environmental features and infrastructure in the broader prospecting right area is described in Section 7.4.1. In summary:

- Gentle undulating plains, with surface water drainage in a north-westerly direction.
- A rural type landscape influenced by the development of the rural community, its support infrastructure (powerlines, roads etc.) and subsistence farming activities.

- Generally clayey soils which have been compacted and eroded by over-grazing, community activities and construction/upgrades to the D4220 road.
- Mostly transformed vegetation with high incidence of bush and weed encroachment and little evidence of wild faunal populations in the lower-lying areas. Plant and animal communities on the hills of the Leolo mountains are expected to be better intact.

7.4.3 Environment and current land use map

A conceptual map showing topographical information as well as land uses on and immediately surrounding the prospecting site is provided in Figure 5.

7.5 ENVIRONMENTAL IMPACTS AND RISKS

As noted in Section 7.1, no alternatives are applicable to the project and as such an assessment of alternatives is not applicable to the project.

7.6 METHODOLOGY USED IN DETERMINING THE SIGNIFICANCE OF ENVIRONMENTAL IMPACTS

Both the criteria used to assess the impacts and the method of determining the significance of the impacts is outlined in Table 13. This method complies with the method provided in the EIA guideline document. Part A provides the approach for determining impact consequence (combining intensity, extent and duration). Impact consequence and significance are determined from Part B and C. The consequence rating is considered together with the probability of occurrence in order to determine the overall significance of each impact. The interpretation of the impact significance is given in Part D. The significance of the impact can be related to the level of risk associated with a specific issue.

TABLE 13: IMPACT ASSESSMENT METHODOLOGY

PART A: DEFINITIONS AND CRITERIA*		
Definition of SIGNIFICANCE		Significance = consequence x probability
Definition of CONSEQUENCE		Consequence is a function of intensity, spatial extent and duration
Criteria for ranking of the INTENSITY of environmental impacts	VH	Severe change, disturbance or degradation. Associated with severe consequences. May result in severe illness, injury or death. Targets, limits and thresholds of concern continually exceeded. Substantial intervention will be required. Vigorous/widespread community mobilization against project can be expected. May result in legal action if impact occurs.
	H	Prominent change, disturbance or degradation. Associated with real and substantial consequences. May result in illness or injury. Targets, limits and thresholds of concern regularly exceeded. Will definitely require intervention. Threats of community action. Regular complaints can be expected when the impact takes place.
	M	Moderate change, disturbance or discomfort. Associated with real but not substantial consequences. Targets, limits and thresholds of concern may occasionally be exceeded. Likely to require some intervention. Occasional complaints can be expected.
	L	Minor (Slight) change, disturbance or nuisance. Associated with minor consequences or deterioration. Targets, limits and thresholds of concern rarely exceeded. Require only minor interventions or clean-up actions. Sporadic complaints could be expected.
	VL	Negligible change, disturbance or nuisance. Associated with very minor consequences or deterioration. Targets, limits and thresholds of concern never exceeded. No interventions or clean-up actions required. No complaints anticipated.
	VL+	Negligible change or improvement. Almost no benefits. Change not measurable/will remain in the current range.
	L+	Minor change or improvement. Minor benefits. Change not measurable/will remain in the current range. Few people will experience benefits.
	M+	Moderate change or improvement. Real but not substantial benefits. Will be within or marginally better than the current conditions. Small number of people will experience benefits.
	H+	Prominent change or improvement. Real and substantial benefits. Will be better than current conditions. Many people will experience benefits. General community support.

	VH+	Substantial, large-scale change or improvement. Considerable and widespread benefit. Will be much better than the current conditions. Favourable publicity and/or widespread support expected.
Criteria for ranking the DURATION of impacts	VL	Very short, always less than a year. Quickly reversible
	L	Short-term, occurs for more than 1 but less than 5 years. Reversible over time.
	M	Medium-term, 5 to 10 years.
	H	Long term, between 10 and 20 years. (Likely to cease at the end of the operational life of the activity)
	VH	Very long, permanent, +20 years (Irreversible. Beyond closure)
Criteria for ranking the EXTENT of impacts	VL	A part of the site/property.
	L	Whole site.
	M	Beyond the site boundary, affecting immediate neighbours
	H	Local area, extending far beyond site boundary.
	VH	Regional/National

PART B: DETERMINING CONSEQUENCE

INTENSITY = VL							
DURATION	Very long	VH	Low	Low	Medium	Medium	High
	Long term	H	Low	Low	Low	Medium	Medium
	Medium term	M	Very Low	Low	Low	Low	Medium
	Short term	L	Very low	Very Low	Low	Low	Low
	Very short	VL	Very low	Very Low	Very Low	Low	Low
INTENSITY = L							
DURATION	Very long	VH	Medium	Medium	Medium	High	High
	Long term	H	Low	Medium	Medium	Medium	High
	Medium term	M	Low	Low	Medium	Medium	Medium
	Short term	L	Low	Low	Low	Medium	Medium
	Very short	VL	Very low	Low	Low	Low	Medium
INTENSITY = M							
DURATION	Very long	VH	Medium	High	High	High	Very High
	Long term	H	Medium	Medium	Medium	High	High
	Medium term	M	Medium	Medium	Medium	High	High
	Short term	L	Low	Medium	Medium	Medium	High
	Very short	VL	Low	Low	Low	Medium	Medium
INTENSITY = H							
DURATION	Very long	VH	High	High	High	Very High	Very High
	Long term	H	Medium	High	High	High	Very High
	Medium term	M	Medium	Medium	High	High	High
	Short term	L	Medium	Medium	Medium	High	High
	Very short	VL	Low	Medium	Medium	Medium	High
INTENSITY = VH							
DURATION	Very long	VH	High	High	Very High	Very High	Very High
	Long term	H	High	High	High	Very High	Very High
	Medium term	M	Medium	High	High	High	Very High
	Short term	L	Medium	Medium	High	High	High
	Very short	VL	Low	Medium	Medium	High	High

VL	L	M	H	VH
A part of the site/ property	Whole site	Beyond the site, affecting neighbours	Extending far beyond site but localised	Regional/ National
EXTENT				

PART C: DETERMINING SIGNIFICANCE

PROBABILITY (of exposure to impacts)	Definite/ Continuous	VH	Very Low	Low	Medium	High	Very High
	Probable	H	Very Low	Low	Medium	High	Very High
	Possible/ frequent	M	Very Low	Very Low	Low	Medium	High
	Conceivable	L	Insignificant	Very Low	Low	Medium	High
	Unlikely/ improbable	VL	Insignificant	Insignificant	Very Low	Low	Medium

	VL	L	M	H	VH
	CONSEQUENCE				

PART D: INTERPRETATION OF SIGNIFICANCE

Significance	Decision guideline
Very High	Potential fatal flaw unless mitigated to lower significance.
High	It must have an influence on the decision. Substantial mitigation will be required.
Medium	It should have an influence on the decision. Mitigation will be required.
Low	Unlikely that it will have a real influence on the decision. Limited mitigation is likely required.
Very Low	It will not have an influence on the decision. Does not require any mitigation
Insignificant	Inconsequential, not requiring any consideration.

***VH = very high, H = high, M= medium, L= low and VL= very low and + denotes a positive impact.**

7.7 POSITIVE AND NEGATIVE IMPACTS OF THE PROPOSED ACTIVITY AND ALTERNATIVES

As noted in Section 7.1, no site layout or infrastructure locational alternatives are being considered and as such an assessment of alternatives is not applicable to the project. The preferred project alternative is assessed in Section 9.

7.8 POSSIBLE MANAGEMENT ACTIONS THAT COULD BE APPLIED AND THE LEVEL OF RISK

A summary of issues and concerns raised by I&APs during the EIA process is provided in Section 7.3. As indicated in Section 7.3, issues raised related to communication and the public participation process. As such this section is not applicable.

7.9 MOTIVATION WHERE NO ALTERNATIVE SITES WERE CONSIDERED

No feasible alternatives exist for the proposed project and as such this section is not applicable. Refer to Section 7.1 for further detail.

7.10 STATEMENT MOTIVATING THE PREFERRED ALTERNATIVE

No feasible alternatives exist for the proposed project and as such this section is not applicable. Refer to Section 7.1 for further detail.

8 FULL DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS AND RISKS THE ACTIVITY WILL IMPOSE ON THE PREFERRED SITE THROUGH THE LIFE OF THE ACTIVITY

8.1 DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY IMPACTS

Biophysical and socio-economic impacts associated with the proposed project were identified through a general site drive-through undertaken by SLR.

As part of the public participation process, I&APs and commenting authorities (see Section 7.2) are being provided with opportunities to provide input into the BAR process and comment on the proposed project, including the identification of environmental and socio-economic impacts.

8.2 FINAL PROSPECTING EMP PERFORMANCE ASSESSMENT

A final EMP performance assessment was undertaken by SLR to inform the closure of the prospecting right. As access to the drill sites has been denied, no recent monitoring reports or photographs of the drill sites are available. In this regard, the final EMP performance assessment has been informed by the following:

- Previous prospecting EMP performance assessments.
- Previous Marula drilling reports.
- Review of historical google earth imagery.
- Review of available photographs of the decommissioned drill sites (photographs taken in 2010 and 2013. Refer to Figure 4).
- Observations from a drive-through of the broader prospecting right area in April 2019 (in which community activities, over-grazing, and compaction and erosion of soils were found to have altered the baseline environment).
- Review of climatic conditions between 2012 and 2019, to inform likely success of re-vegetation of drill sites where passive monitoring could not be undertaken.

Based on the above, the following findings are noted for the final EMP performance assessment:

- There are currently no drilling activities taking place on site. Five drill sites were completed during the prospecting period.
- At the time of the 2013 EMP performance assessment, drill sites BH7325 and BH7327 had fully re-vegetated and no further maintenance or aftercare activities was deemed necessary. This is considered to still be applicable to this final assessment.
- At the time of the 2013 assessment the re-vegetation of drill sites BH8171, BH8172 and BH8173 was still in progress. Following this, access to the drill sites was denied by the local community.
- The 2017 EMP performance assessment recommended that monitoring of drill sites BH8171, BH8172 and BH8173 be undertaken until such time as vegetation has re-established to a satisfactory level. It is understood that monitoring in line with this recommendation has not been possible due to Marula still being denied access to the sites.
- With good subsequent rainy seasons (which have occurred in the area – see Section 7.4.1) vegetation would likely have re-established in these areas.
- With reference to the environmental attributes of the general prospecting right area described in Section 7.4.1, it was noted that ongoing community activities (livestock grazing, subsistence agriculture etc.) taking place within the prospecting right area has resulted in over-grazing of the veld, soil erosion and soil compaction. This has likely influenced the revegetation status of the drill sites, particularly BH8171, BH8172 and BH8173.

In the absence of recent photographs and a final site inspection of these drill sites, a precautionary approach has been used to inform this final performance assessment. Based on photos of drill sites taken in 2013 (see Figure 4) and subsequent rainy seasons a conservative assumption has been made that drill sites BH8171, BH8172 and

BH8173 are expected to have rehabilitated to 90% and require passive monitoring. This has been reflected in the closure provision update provided in Section 18. When the DMR undertakes its site visit, it is recommended that a site inspection of drill sites be undertaken to ground-truth the expected rehabilitation status of drill sites BH8171, BH8172 and BH8173.

The EMP performance assessment procedure is described in detail in Appendix F.

8.3 DESCRIPTION OF THE PROCESS UNDERTAKEN TO ASSESS AND RANK THE IMPACTS AND RISKS

A description of the assessment methodology used to assess the severity of identified impacts (including the nature of impacts and the degree to which impacts may cause irreplaceable loss of resources), the extent of the impacts, the duration and reversibility of impacts, the probability of the impact occurring, and the degree to which the impacts can be mitigated is provided in Section 7.5.

8.4 A DESCRIPTION OF THE ENVIRONMENTAL IMPACTS AND RISKS IDENTIFIED DURING THE ENVIRONMENTAL ASSESSMENT PROCESS

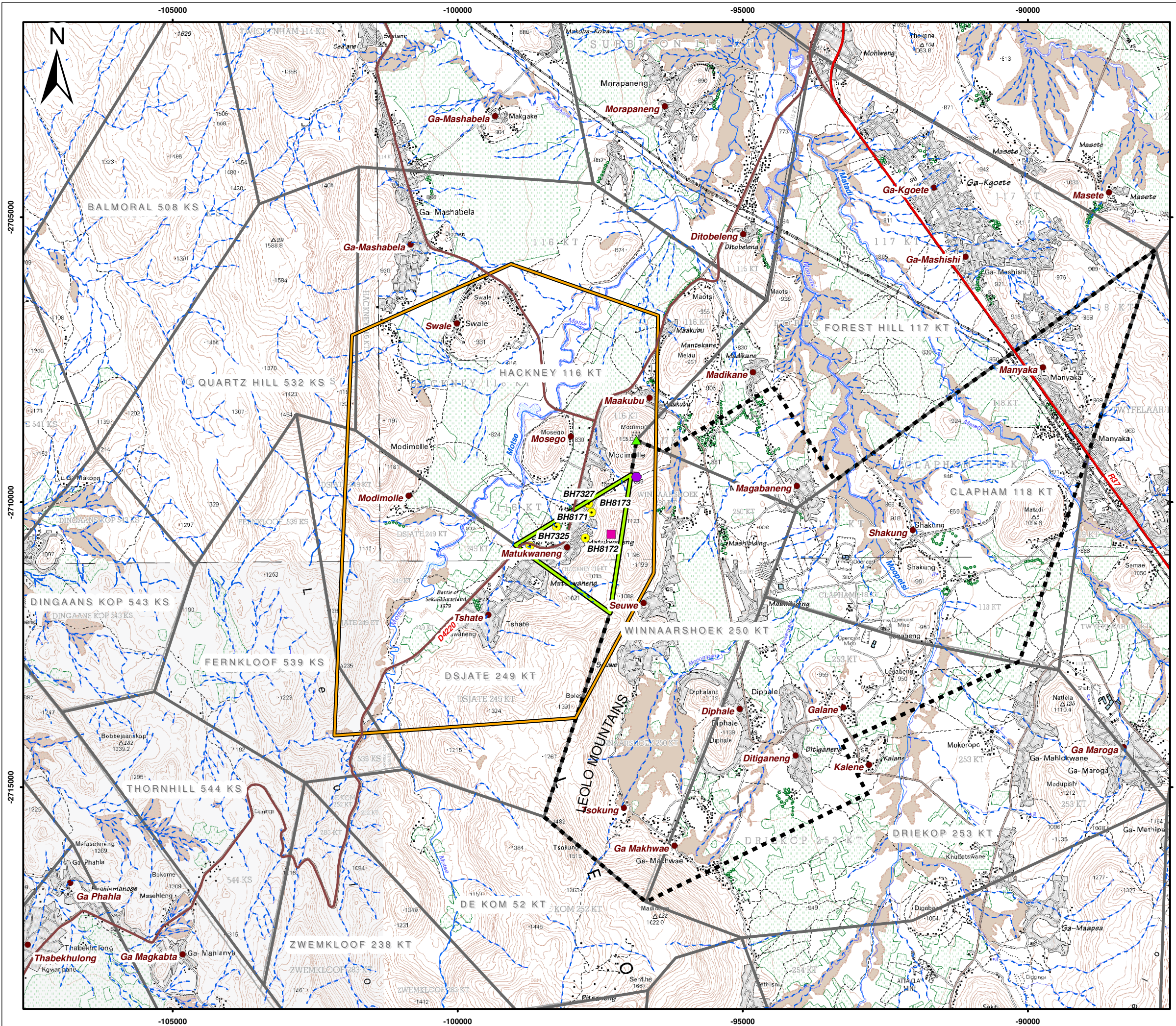
Table 14 provides a description of the impacts on environmental and socio-economic aspects in respect of each of the main project actions / activities and processes that are assessed in Section 8.

TABLE 14: LIST OF POTENTIAL IMPACTS AS THEY RELATED TO THE PROPOSED PROJECT

Potential impact	Activity	Alternative	Project phases
Loss of flora and fauna if through lack of or poor rehabilitation	Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Closure of the prospecting right	Closure and rehabilitation
Loss of pre-prospecting land uses through lack of or poor rehabilitation	Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Closure of the prospecting right	Closure and rehabilitation
Change in the visual landscape of the area	Installation cement beacon and standpipe	Closure of the prospecting right	Closure and rehabilitation
Negative and positive socio-economic impacts	Marula's discontinuation of prospecting activities	Closure of the prospecting right	Closure and rehabilitation

8.5 ASSESSMENT OF THE SIGNIFICANCE OF EACH IMPACT AND RISK AND AN INDICATION OF THE EXTENT OF TO WHICH THE ISSUE AND RISK CAN BE AVOIDED OR ADDRESSED BY THE ADOPTION OF MANAGEMENT ACTIONS

The assessment of the significance of potential impacts, including the extent to which impacts can be avoided or mitigated, is included in Section 9 and Appendix D.



- Legend**
- Villages / Towns
 - Main Roads
 - Secondary Roads
 - Perennial Rivers
 - - - Non-Perennial Rivers
 - ▭ Tsjate Provincial Heritage Site
 - ▲ Modimolle Sacred Mountain
 - Early Iron Age Site
 - Sefateng Poort with Communal Grinding Stone and Isivavani
 - Drill Sites
 - ▭ Farms
 - ▭ Hackney Prospecting Right Area
 - - - Marula Mining Right Area
 - Urban
 - Cultivated
 - Inland Water and Dams
 - Thicket & bushland
 - Dongas & Erosion Areas

0 500 1 000 Meters
 Scale: 1:65 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mine

Figure 4
Area Under Closure including the Final and Future Land Use

SLR
 SLR Consulting (Africa) (Pty) Ltd
 P O Box 1596, Cramerview, 2060, South Africa
 Tel: +27 (11) 467-0945 Fax: +27 (11) 467-0978

9 ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK

A summary of the assessment of the biophysical and socio-economic impacts associated with the proposed project is provided in Table 15 below. A full description of the assessment is included in Appendix D. Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr, therefore, the assessment of the unmitigated scenario takes this into account. The mitigated scenario is where additional mitigation measures are required.

TABLE 15: ASSESSMENT OF SIGNIFICANT IMPACTS AND RISKS

Activity	Potential impact	Aspects affected	Phase	Significance (Unmitigated) (takes into account measures implemented in line with approved EMPr)	Management actions type	Significance (Mitigated)	Extent to which the impact can be reversed, avoided or cause irreplaceable loss and the degree to which the impact and risk can be mitigated
Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Loss of flora and fauna through lack of or poor rehabilitation	Flora and Fauna	Closure and rehabilitation	Very Low	No additional mitigation required. Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.	Not applicable. No additional mitigation measures are possible due to Marula being denied access to the three remaining drill sites.	Possible
Replacement of topsoil Ripping of compacted soils Natural re-vegetation	Loss of pre-prospecting land uses through lack of or poor rehabilitation	Land-use	Closure and rehabilitation	Very Low		Not applicable. No additional mitigation measures are possible due to Marula being denied access to the three remaining drill sites.	Possible
Installation of cement beacon and standpipe	Change in the visual landscape of the area	Visual	Closure and rehabilitation	Insignificant	No additional mitigation required.	Not applicable. No additional mitigation measures are possible due to Marula being denied access to the three remaining drill sites.	Not required
Closure of	Negative and	Socio-	Closure and	Very Low	No additional mitigation is possible due	Not applicable. No additional	Possible

Activity	Potential impact	Aspects affected	Phase	Significance (Unmitigated) (takes into account measures implemented in line with approved EMPr)	Management actions type	Significance (Mitigated)	Extent to which the impact can be reversed, avoided or cause irreplaceable loss and the degree to which the impact and risk can be mitigated
prospecting activities	positive socio-economic impacts	economic	rehabilitation		to Marula being denied access to the area. It is recommended that as part of a DMR visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents as an annexure to this report.	mitigation measures are possible due to Marula being denied access to the three remaining drill sites.	

10 SUMMARY OF SPECIALIST REPORT FINDINGS

Given the nature of the project, it was not deemed necessary to undertake any project specific specialist studies. This section is therefore not applicable.

11 ENVIRONMENTAL IMPACT STATEMENT

11.1 SUMMARY OF KEY FINDINGS

This section provides a summary of the findings of identified and assessed potential impacts on the receiving environment. Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr, therefore the assessment of the unmitigated scenario takes this into account. A summary of the potential impacts (as per Section 9) is included in Table 16 below.

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation is required; passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

TABLE 16: SUMMARY OF POTENTIAL IMPACTS

Aspect	Potential impact	Impact significance / Residual risk (the ratings are negative unless otherwise specified)
		Unmitigated (takes into account measures implemented in line with approved EMPr)
Flora and Fauna	Loss of flora and fauna through lack of or poor rehabilitation	Very Low
Land Use	Loss of pre-prospecting land uses through lack of or poor rehabilitation	Very Low
Visual landscape	Change in the visual landscape of the area	Insignificant
Socio-economic	Negative and positive socio-economic impacts resulting from Marula's discontinuation of prospecting	Very low

11.2 FINAL SITE MAP

The final preferred site layout plan (layout of decommissioned drill sites) is included in Figure 3.

11.3 SUMMARY OF THE POSITIVE AND NEGATIVE IMPACTS AND RISKS OF THE PROPOSED ACTIVITY AND IDENTIFIED ALTERNATIVES

With reference to Sections 7.1 no site layout or infrastructure locational alternatives were considered and as such this section is not applicable.

12 IMPACT MANAGEMENT OBJECTIVES AND OUTCOMES FOR INCLUSION IN THE EMPR

Based on the outcome of the impact assessment the proposed management objectives and outcomes specific to the proposed project and for inclusion into the environmental management programme are detailed in this section.

12.1 PROPOSED MANAGEMENT OBJECTIVES AND OUTCOMES FOR ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACTS

Specific environmental objectives to control, remedy or prevent potential impacts emanating from the proposed project are provided in Table 17 below. These are aligned specifically to Marula’s closure objectives.

TABLE 17: ENVIRONMENTAL OBJECTIVES AND OUTCOMES

Aspect	Environmental objective	Outcome
Flora and Fauna	To prevent the unacceptable loss of flora and fauna if any residual contamination exists (considered unlikely) and if re-vegetation isn’t successful (unknown).	Ensure that vegetation successfully re-establishes itself and no residual contamination remains on site.
Land use	To prevent loss of pre-mining land use if any residual contamination exists (considered unlikely) and if revegetation isn’t successful (unknown).	Ensure that vegetation successfully re-establishes itself and no residual contamination remains on site, this allowing pre-project land uses to continue.
Visual landscape	To limit negative visual impacts.	Ensure that vegetation successfully re-establishes itself so as to limit scaring of the landscape.
Socio-economic	To limit negative socio-economic impacts, and enhance positive economic impacts.	Ensure that negative socio-economic impacts are managed through suitable communication structures. Ensure that positive socio-economic impacts are enhanced through suitable communication structures.

12.1.1 Impacts that require monitoring programmes

Outcomes of the environmental objectives are the implementation of monitoring programmes. Impacts that may require monitoring include:

- Loss of flora and fauna through lack of or poor rehabilitation.
- Loss of pre-prospecting land uses through lack of or poor rehabilitation.

At the time of the 2013 EMP performance assessment, for two of the drill sites (completed in 2007), vegetation had successfully re-established. For the remaining three drill sites (completed in 2012), re-vegetation was in progress. Although it was not possible to visit these three drill sites at the time of the current assessment, the area has experienced average to above average rainfall since 2013 which would have assisted with the natural revegetation of the remaining drill sites. On-going community activities and use of the land would have potentially hampered this. In addition the presence of alien invasive species is possible. This however could not be verified by SLR. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

12.1.2 Activities and infrastructure

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr.

12.1.3 Management actions

Decommissioning and rehabilitation activities have already taken place in line with the management measures outlined in the approved EMPr. No additional mitigation is required. Passive monitoring of BH8171, BH8172 and BH8173 may be required (see Section 26).

12.1.4 Roles and responsibilities

The key personnel to ensure compliance to this BAR and EMPr are the Operations Executive, Stakeholder Department Manager and the Environmental Department Manager and officers. As a minimum, their roles, as they relate to the implementation of monitoring programmes and management activities, include:

- Ensuring that monitoring programmes and audits are scoped to be fit for purpose and included in the annual mine budget, where applicable.
- Identifying and appointing appropriately qualified specialists/engineers to undertake the monitoring programmes, where applicable.
- Establishing and maintaining good working relations with surrounding communities and landowners (as far as possible).
- Facilitating stakeholder communication, information sharing and a grievance mechanism.

13 ASPECTS FOR INCLUSION AS CONDITIONS OF THE AUTHORISATION

Given that the final status of revegetation at BH8171, BH8172 and BH8173 could not be verified by SLR at the time of the assessment, due to access being denied by the community, it is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

With reference to Regulation 26 of GNR 982 of NEMA, additional conditions that should form part of the environmental authorisation that are not specifically included in the EMPr report include compliance with all applicable environmental legislation whether specifically mentioned in this document or not and which may be amended from time to time.

14 ASSUMPTIONS, UNCERTAINTIES, LIMITATIONS AND GAPS IN KNOWLEDGE

In light of access to the drill sites having been prevented by community members, this BAR relies on SLR's professional opinion which has been informed by the following:

- Previous EMP performance assessments.
- Previous financial provision reports.
- Historical drilling reports.
- Photographs taken in 2012.
- A review of historical google earth imagery.
- Review of climatic conditions since 2012 (to determine anticipated extent of vegetation re-establishment at the drill sites).
- A drive through the broader prospecting right area.

14.1 ENVIRONMENTAL ASSESSMENT LIMIT

The EIA focuses on third parties only and does not assess health and safety impacts on employees and contractors because the assumption is made that these aspects are separately regulated by health and safety legislation, policies and standards, and that Marula will adhere to these.

15 REASONED OPINION AS TO WHETHER THE PROPOSED ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED

15.1 REASONS WHY THE ACTIVITY SHOULD BE AUTHORISED OR NOT

The assessment of the project indicates that the potential for negative residual impacts/risks is very low to insignificant. It follows that no additional active mitigation is required; passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

15.2 CONDITIONS THAT MUST BE INCLUDED IN THE AUTHORISATION

15.2.1 Specific conditions for inclusion in the EMPr

Refer to Section 13.

15.2.2 Rehabilitation requirements

Refer to Section 27.

16 PERIOD FOR WHICH AUTHORISATION IS REQUIRED

Marula has already decommissioned the drill sites within the Hackney 116 KT prospecting area. The environmental authorisation is required in support of the closure of a prospecting right.

17 UNDERTAKING

I, Caitlin Hird, the Environmental Assessment Practitioner responsible for compiling this report, undertake that:

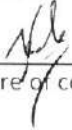
- The information provided herein is correct
- Comments and inputs from stakeholders and I&APs have been included and correctly recorded in this report
- Inputs and recommendations from the specialist reports have been included where relevant
- Any information provided to I&APs and any responses to comments or inputs made is correct or was correct at that time.



Signature of EAP

15/05/2019

Date



Signature of commissioner of oath

15-05-2019

Date

**OREN JAN VAN VREDE
COMMISSIONER OF OATHS
EX OFFICIO
PROFESSIONAL
ACCOUNTANT (S.A.)**

**FOURWAYS MANOR OFFICE PARK
UNIT 7, FOURWAYS
☎(011) 467 - 0945**

18 FINANCIAL PROVISION

18.1 METHOD TO DERIVE THE FINANCIAL PROVISION

The closure cost liability was calculated as per the methodology of the DMR guideline document of January 2005.

The amount determined for financial provision for the project is provided in Section 27. This complies with the NEMA Financial Provisioning Regulation (2015) requirements.

18.2 CONFIRM THAT THE AMOUNT CAN BE PROVIDED FOR FROM OPERATING EXPENDITURE

The amount required in order to monitor the successful rehabilitation of the drill sites is provided for in the operating costs.

19 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

19.1 IMPACT ON THE SOCIO-ECONOMIC CONDITIONS OF ANY DIRECTLY AFFECTED PERSON

The impacts associated with socio-economic conditions are discussed in Appendix D.

Direct socio-economic impacts include:

- Loss of social and economic benefits (to contractor) by not continuing with the prospecting, but it is assumed that the contractor would find contracts elsewhere.
- Social and economic benefits as a result of resource becoming available for other potential prospectors.

Indirect socio-economic impacts include:

- Loss of pre-prospecting land uses through lack of or poor rehabilitation.

The assessment of the project indicates that the potential for negative residual socio-economic impacts/risks is very low.

19.2 IMPACT ON ANY NATIONAL ESTATE REFERRED TO IN SECTION 3(2) OF THE NATIONAL HERITAGE RESOURCES ACT

Not applicable. No national estate will be affected as part of the project.

20 OTHER MATTERS REQUIRED IN TERMS OF SECTIONS 24(4)(A) AND (B) OF THE ACT

No other matters are required in terms of Section 24(4)(A) and (B) of the Act.

PART B - ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN

21 DETAILS OF THE EAP

The details of the EAPs who undertook the EIA process and prepared this EMPr and Closure Plan are provided in Part A, Section 1.

22 DESCRIPTION OF THE ASPECTS OF THE ACTIVITY

The activities that are covered in the EMPr and Closure Plan are included in Part A, Section 3.

23 COMPOSITE MAP

A map superimposing the proposed activity over the environmental sensitivities of the prospecting right area is included in Appendix E.

24 DESCRIPTION OF THE IMPACT MANAGEMENT OBJECTIVES INCLUDING MANAGEMENT STATEMENT

24.1 DETERMINATION OF CLOSURE OBJECTIVES

The closure objectives for the project were developed against the local environmental and socio-economic context of the prospecting project (see Section 7.4), as well as, regulatory requirements (see Section 4) and perceived stakeholder expectations (see Section 7.2). Further information pertaining to the closure objectives identified for the project is provided in Section 27.1.1.

24.2 PROCESS FOR MANAGING ANY ENVIRONMENTAL DAMAGE, POLLUTION OR ECOLOGICAL DEGRADATION AS A RESULT OF UNDERTAKING A LISTED ACTIVITY

It is recommended that a site visit be undertaken with the DMR to determine the need for monitoring of drill sites BH8171, BH8172 and BH8173 until such time as rehabilitation has been successfully achieved and is in line with Marula's closure objectives.

24.3 POTENTIAL RISK OF ACID MINE DRAINAGE

Acid Mine Drainage is not a risk associated with prospecting activities and therefore has not been considered further in this report.

24.4 VOLUMES AND RATE OF WATER USE FOR MINING

No water will be used and therefore this section is not applicable.

24.5 HAS A WATER USE LICENCE BEEN APPLIED FOR?

No water uses are triggered by the closure of the prospecting right and therefore a water use license application is not applicable.

24.6 IMPACTS TO BE MITIGATED IN THEIR RESPECTIVE PHASES

The assessment of potential impacts is included in Section 9 and Appendix D. No additional mitigation is required. This section is therefore not applicable.

Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

25 IMPACT MANAGEMENT OUTCOMES

No additional mitigation is required. This section is therefore not applicable.

Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

26 IMPACT MANAGEMENT ACTIONS

No additional mitigation is required. This section is therefore not applicable.

Passive monitoring of BH8171, BH8172 and BH8173 may be required. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

27 FINANCIAL PROVISION

27.1 DETERMINATION OF THE AMOUNT OF THE FINANCIAL PROVISION

27.1.1 Closure objectives description and the alignment with the baseline environment

The closure objective is to return land disturbed by the prospecting operations to its pre-disturbed state. In this case, the pre-prospecting state was that of:

- Gentle undulating plains, with surface water drainage in a north-westerly direction.
- Visually, a landscape that has been influenced by the development of the rural community, its support infrastructure (powerlines, roads etc.) and subsistence farming activities.
- Generally clayey soils which have been compacted and eroded by over-grazing, community activities and road construction by the local Roads Department.
- Vegetation mostly transformed with high incidence of bush and weed encroachment.
- Little evidence of wild faunal populations.

27.1.2 Confirmation that closure objectives have been consulted with landowners and I&APs

The intended final land use was outlined in the BID made available to landowners and I&APs for review and initial comment. The closure objective and closure plan for the prospecting right area is outlined in this report which is being made available for review and comment to landowners and I&APs (see Section 7.2 for further details).

To date no comments regarding closure objectives have been received from landowners or I&APs (see Section 7.3).

27.1.3 Regulatory requirements and conditions for closure

The regulatory requirements for closure are included in Section 4.

The conditions for closure are outlined below.

- Achieve physical stability over all landscapes disturbed by prospecting activities.
- Return land to its pre-disturbance potential.
- Maximise visual 'harmony' with the surrounding landscape.

27.1.4 Rehabilitation plan

Rehabilitation of the prospecting sites has been undertaken as outlined in Section 3.2. In accordance with the MPRDA Closure Plan requirements (Regulation 62b) and the NEMA Closure Plan requirements (Appendix 5 1(i)) of the EIA Regulations), a plan showing the area under closure including the final and future land use is presented in Figure 5.

27.1.5 Compatibility of the rehabilitation plan with the closure objectives

It can be confirmed that the rehabilitation plan is compatible with the closure objectives given that the closure objectives were taken into account during the determination of the financial provision.



BH7325 (drilled in 2007). Vegetation has successfully re-established (photo taken in 2010)



BH7327 (drilled in 2007). Vegetation has successfully re-established (photo taken in 2010)



BH8171 (drilled in 2012). Re-vegetation is in progress (photo taken in 2013)



BH8172 (drilled in 2012). Re-vegetation is in progress (photo taken in 2013)



BH8173 (drilled in 2012). Re-vegetation is in progress (photo taken in 2013)

27.1.6 Calculate and state the quantum of the financial provision

Based on the final EMP performance assessment, the closure cost estimate below assumes the following:

- There are currently no drilling activities taking place on site.
- Drill sites BH7325 and BH7327 have fully re-vegetated and no further maintenance or aftercare activities are deemed necessary.

The re-vegetation of drill sites BH8171, BH8172 and BH8173 is in progress. In the absence of recent photographs and a follow-up site visit of these drill sites (due to access being denied by the community), a conservative approach has been applied. It is assumed that these drill sites have rehabilitated to 90% but are not yet fully re-vegetated. Given that Marula is applying to close the prospecting right and no remaining boreholes will be drilled under the prospecting right, only the current closure liability has been included in his report.

The closure cost estimate in Table 18 below assumes that monitoring of the rehabilitation work at BH8171, BH8172 and BH8173 will be required. Allowance has been made for maintenance and aftercare to be applied for a period of 2-3 years. Post closure management is included under preliminary, general and administration items.

TABLE 18: CURRENT CLOSURE AND REHABILITATION COSTS

Hackney Prospecting Operations					
Current Closure and Rehabilitation Costs					
Item	Description	Quantity	Unit	Rate	Amount
1	Sealing of boreholes (0 sites)	0.00	No.	R 1 305.00	R 0.00
2	Demolish and remove concrete drilling platform (not applicable)	0.00	No.	R 2 890.00	R 0.00
3	Removal of portable ablition facilities (not applicable)	0.00	No.	R 725.00	R 0.00
4	Demolish and backfill sumps (5m x 3m x 0)	0.00	No.	R 935.00	R 0.00
Item	Description	Quantity	Unit	Rate *	Amount
5	General surface rehabilitation of current drilled sites (not applicable)	0.00	ha	R 116 708.59	R 0.00
6	General surface rehabilitation of recently rehabilitated sites (not applicable)	0.00	ha	R 116 708.59	R 0.00
7	General surface rehabilitation of previously rehabilitated sites (20m x 20m x 3) (sites are partially revegetated therefore rate is reduced by 90%)	0.12	ha	R 11 670.86	R 1 400.50
8	General surface rehabilitation (rip and vegetate) of access tracks (not applicable)	0.00	ha	R 116 708.59	R 0.00
9	Demobilise and general surface rehabilitation (rip and vegetate) of camp sites (not applicable)	0.00	ha	R 116 708.59	R 0.00
10	2 to 3 years of maintenance & aftercare	0.12	ha	R 15 531.56	R 1 863.79
				SUB TOTAL 1	R 3 264.29
11	Preliminary and General	12.0000	%	of Sub Total 1	R 391.71
12	Contingencies	10.0000	%	of Sub Total 1	R 326.43
				SUB TOTAL 2	R 3 982.43
13	VAT	15.0000	%	of Sub Total 2	R 597.37
				GRAND TOTAL	R 4 579.80

* Rates have been taken from "Guideline Document for the Evaluation of the Quantum of Closure-Related Financial Provision Provided by a Mine" as published by the Department of Minerals and Energy (DME), dated January 2005. The rates have been inflated by 121.88 % to account for escalation since January 2005.

Reputable consultant: The entire closure calculation (including rates) was provided by SLR Consulting(Africa) (Pty) Ltd (SLR). SLR is a specialist environmental engineering and consulting company with over twelve years experience in this field.

Marula submitted a financial guarantee of R11 400 to the DMR for this prospecting right in 2005. Based on the estimated rehabilitation and closure costs outlined above the updated final financial provision is calculated at R4 579.80 (including VAT). In the scenario where monitoring of BH8171, BH8172 and BH8173 is required, the existing financial guarantee of R11 400 is deemed adequate to address any monitoring requirements. In the scenario where no further monitoring is required, based on the DMR site visit and in consultation with the DMR, the financial guarantee will be cancelled.

27.1.7 Confirmation that the financial provision will be provided

An existing financial guarantee is held with FirstRand Bank to the value of R11 400 (dated 16 September 2005, Guarantee No. G0657/0314935/GLO).

Based on the outcome of this assessment, the existing financial guarantee of R11 400 is deemed adequate to address any monitoring requirements relating to drill sites BH8171, BH8172 and BH8173.

28 MECHANISMS FOR MONITORING COMPLIANCE AND PERFORMANCE AGAINST THE EMPR

Monitoring of compliance and performance against the EMPr was done through bi-annual performance assessments of the prospecting activities which were submitted to the DMR. This report presents the findings of the final performance assessment and therefore no further performance assessments are deemed necessary.

At the time of the 2013 EMP performance assessment, for two of the drill sites (completed in 2007), vegetation had successfully re-established. For the remaining three drill sites (completed in 2012), re-vegetation was in progress. Although it was not possible to visit these three drill sites at the time of the current assessment, the area has experienced average to above average rainfall since 2013 which would have assisted with the natural revegetation of the remaining drill sites. Ongoing community activities and use of the land would have potentially hampered this. In addition the presence of alien invasive species is possible. This however could not be verified by SLR. It is recommended that as part of a DMR site visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents submitted as an appendix to this report.

29 FREQUENCY OF SUBMISSION OF PERFORMANCE ASSESSMENT REPORT

If monitoring of drill sites BH8171, BH8172 and BH8173 is required, the frequency for submission of performance assessment reports will be agreed in consultation with the DMR.

30 ENVIRONMENTAL AWARENESS PLAN

Given that this report is in support of an application for the closure of a prospecting right, an environmental awareness plan is not deemed necessary.

31 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

Given that this report is in support of an application for the closure of a prospecting right, no further information is expected to be required by the competent authority.

32 UNDERTAKING

I, Caitlin Hird, the Environmental Assessment Practitioner responsible for compiling this EMPr, undertake that:

- The information provided herein is correct;
- Comments and inputs from stakeholders and I&APs have been included and correctly recorded in this report;
- Inputs and recommendations from the specialist reports have been included where relevant; and
- Any information provided to I&APs and any responses to comments or inputs made is correct or was correct at that time.



Signature of EAP

15/05/2019

Date



Signature of commissioner of oath

15-05-2019

Date

**OREN JAN VAN VREDE
COMMISSIONER OF OATHS
EX OFFICIO
PROFESSIONAL
ACCOUNTANT (S.A.)**

**FOURWAYS MANOR OFFICE PARK
UNIT 7, FOURWAYS
☎(011) 467 - 0945**

33 REFERENCES

Marula Platinum. 2015. Final Prospecting Drilling Report of a Portion of the Farm Hackney 116 KT, for the period 10 October 2006 to 7 November 2015. November 2015

Metago Environmental Engineers (Pty) Ltd. 2007. Environmental Impact Assessment and Environmental Management Programme for Marula Platinum Mine. October 2007

SLR Consulting (Africa) (Pty) Ltd. 2012. Environmental Impact Assessment and Environmental Management Programme Report for the proposed tailings scavenger plant, two additional ventilation shafts and the extension of underground mining activities to include the farm Hackney 116 KT and a portion of the farm Driekop 253 KT. October 2012

SLR Consulting (Africa) (Pty) Ltd. 2017. Hackney 116KT Prospecting EMP Performance Assessment. September 2017

SLR Consulting (Africa) (Pty) Ltd. 2017. Hackney 116KT Prospecting Operations Closure Liability Estimate. September 2017

APPENDIX A: EXISTING AUTHORISATION (PROSPECTING RIGHT)



DEPARTMENT: MINERALS AND ENERGY
REPUBLIC OF SOUTH AFRICA

PROSPECTING RIGHT

Granted in terms of section 17(1) of the Mineral and Petroleum Resources Development Act, 2002
(Act No. 28 of 2002)

A handwritten signature in black ink, appearing to be 'R. M. ...', located in the bottom right corner of the page.

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Registered in the MINERAL & PETROLEUM TITLES
 REGISTRATION OFFICE: PRETORIA
 in the Register of PROSPECTING RIGHT
 on this 10th day of OCT 2006
 under 420/2006 (PR)
 PP DIRECTOR GENERAL
 DEPT. OF MINERALS AND ENERGY

Cession: DE TLOU ROSBERT RANKAPOLE
 L.M.P.E.R.
 in favour of
 NTRULA PLATINUM (PTY) LTD
 registered on the 11th day of NOVEMBER 2008
 under MPT 5012008
 PP DIRECTOR GENERAL MINERALS EN ENERGIE
 DIRECTOR GENERAL MINERALS AND ENERGY

Protocol No: 20/2006
 File Ref No LP 210 PR
 Application No 050404001

LET IT HEREBY BE MADE KNOWN:

THAT on this **10** day of **October** in the year **2006**, before me, **NICHOLAS KOBEDI SECHELE** notary public, duly sworn and admitted, residing and practising at **PRETORIA**, in the **GAUTENG** Province of South Africa, and in the presence of the subscribing competent witnesses, personally came and appeared:

TLOU ROSBERT RANKAPOLE Regional Manager, **LIMPOPO** Region of the Department of Minerals and Energy, and as such in his/her capacity as the duly authorised representative of:

THE MINISTER OF MINERALS AND ENERGY

The said Regional Manager, being duly authorised thereto under and by virtue of a Power of Attorney granted by the Deputy Director General: Mineral Regulation of the Department of Minerals and Energy on the 02 day of **JULY** in the year **2006** in terms of the powers delegated to him by the Minister on the 12th day of May 2004 in terms of section 103 (1) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002),

AND

STEFANIE VIVIER in her capacity as the duly authorised representative of IMPALA PLATINUM LIMITED,
 Identification/ Registration number

1	9	5	2	/	0	0	1	9	4	2	/	0	6	
---	---	---	---	---	---	---	---	---	---	---	---	---	---	--

(Hereinafter together with his/her/its successors in title and assigns referred to as "the Holder", he/she, the said representative, being duly authorised thereto under and by virtue of a power of attorney/resolution of directors/members of the Holder, signed or passed at JOHANNESBURG on the 06 day OCTOBER in the year 2006 which power of attorney or a certified copy of a resolution has this day been exhibited to me, the notary, and remain filed of record in my protocol with the minutes hereof.)

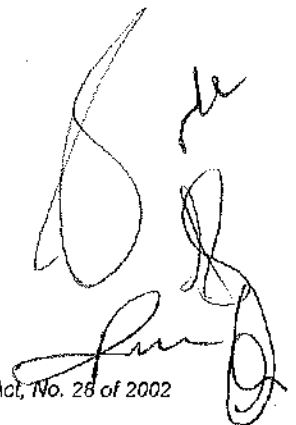
AND THE MINISTER AND HOLDER DECLARED THAT:

WHEREAS The State is the custodian of the nation's mineral and petroleum resources in terms of section 3 of the Act,

AND WHEREAS The Holder has applied for a prospecting right in terms of section 16 of the Act,

AND WHEREAS The Deputy Director-General: Mineral Regulation has by virtue of the powers delegated to him granted to the Holder a prospecting right in terms of Section 17 of the Act.

NOW THEREFORE THE MINISTER GRANTS A PROSPECTING RIGHT TO THE HOLDER SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS:



Definitions

In this prospecting right, unless the context indicates otherwise, the following words and expressions shall have the meanings assigned to them:

'**Act**' means the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) and includes the Regulations, guidelines, directives and orders made in terms of this Act;

'**Effective date**' means 10 day of **OCTOBER** in the year 2006 (being the date on which the Environmental Management Plan is approved in terms of section 39(4) of the Act);

'**Holder**' is as defined in the Act, and specifically in relation to this right, means **IMPALA PLATINUM LIMITED**, Registration No /Identification No. **195200194206**;

'**Mineral**' is as defined in the Act, and specifically in relation to this right means **GOLD ORE, NICKEL ORE, SILVER ORE, COBALT, CHROME ORE, COPPER ORE, SULPHUR (IN PYRITE) AND PLATINUM GROUP METALS**;

'**Minister**' means the Minister of Minerals and Energy and includes the successors in title, the assignee or any person duly authorised to act in the Minister's place and stead;

'**Prospecting Area**' is as defined in the Act and includes any additional area of environmental liability as may be reflected on the Environmental Management Plan relating to this right;

'**Prospecting right**' is as defined in the Act and includes all the Annexures to it, Agreements and inclusions by reference;

'**Prospecting Work Programme**' is defined in the Act and is as reflected in **Annexure "A"** to this prospecting right; and

'**Regional Manager**' is as defined in the Act and specifically in relation to this right means the Regional Manager for the **LIMPOPO** Region of the Department of Minerals and Energy.

1. Description of the Prospecting Area

The Prospecting Area shall comprise the following:

Certain: **Portion of the farm Hackney 116 KT**

Situated: **Sekhukhune, Magisterial/Administrative District of Sekhukhune**

Measuring: **223.2795 hectares in extent.**

(In the case of various farms being involved, a list can be attached and referred to as Annexure);

Which Prospecting Area is described in detail on the attached Diagram/plan marked **Annexure "B"**.

2. Granting of Prospecting Right

2.1 Without detracting from the provisions of sections 5 and 19 of the Act, the Minister grants to the Holder, the sole and exclusive right to:

2.1.1 Prospect for the Holder's own account, the mineral/s in, on and under the Prospecting Area,

[Where the right to remove has not been granted, Clause 2.1.2, and its sub-clauses above are not applicable and should be deleted and the rest of clause 2 should be amended accordingly before execution].

3. Commencement, Duration and Renewal

3.1. This prospecting right shall commence on **10 OCTOBER 2006** and, unless cancelled or suspended in terms of section 47 of the Act, will continue in force for a period of **four years** ending on **09 OCTOBER 2010**.

3.2. The Holder must commence with the prospecting operations within 120 days from the date on which the prospecting right becomes effective in terms of section 17 (5) of the Act or any later date as may, upon a written request by the Holder, be authorised in writing by the Minister in terms of the Act, failing which this right may be cancelled or suspended.

3.3. Any application for a renewal of this prospecting right shall be submitted to the office of the Regional Manager not later than 60 working days prior to the date of expiry of this right.

4. Amendments, Variation and Abandonment

- 4.1 The terms of this right may not be amended or varied (including by extension of the area covered by it or by the addition of minerals or a share or shares or seams, mineralized bodies, or strata, which are not at the time the subject thereof) without the written consent of the Minister.
- 4.2 The Holder shall be entitled to abandon or relinquish the right or the area covered by the right entirely or in part. Upon abandonment or relinquishment of the prospecting area or any portion thereof, the Holder must:
- 4.2.1 Furnish the Regional Manager with all prospecting results and/or information, as well as the general evaluation of the geological, geophysical and borehole data in respect of such abandoned area in so far as it applies to the mineral or any other mineral/s obtained in respect of this right, and
- 4.2.2 Apply for a closure certificate in terms of section 43 (3) of the Act.
- 4.3 With effect from the date the Holder has abandoned or relinquished a portion/s of the Prospecting Area, and subject to section 43 of the Act, the Minister is entitled to grant any prospecting rights or mining rights or any right or permit referred to in the Act in, on, or under the portion/s, so abandoned or relinquished, to any person/s.

5. Payment of Prospecting Fees and Royalties

- 5.1 Prospecting fees as contemplated in section 19(2)(f) of the Act are payable to the State by the Holder from the commencement of this right in accordance with Regulation 76 of the Regulations to the Act.
- 5.2 Royalties as contemplated in section 19(2) (g) are payable to the State by the Holder for the sale and/or disposal of the mineral in terms of and upon the implementation by the Minister of Finance of a relevant Act of Parliament or an amendment of an Act of Parliament which provides for such payment.

6. Payment of Interest

If the prospecting fees and royalties referred to in clause 5 above are not paid punctually, the Holder shall be in *mora* and shall pay interest thereon at the rate prescribed in terms of section 80 of the Public Finance Management Act, 1999 [Act 1 of 1999] reckoned from the date on which payment becomes due and payable, to the date of actual payment.

Handwritten signature and initials, possibly 'R. S. A.', located in the bottom right corner of the page.

7. Restrictions and Obligations Imposed on the Holder

- 7.1. The Holder is entitled to the rights referred to in sections 5(2), (3) and 19 of the Act, and such other rights as may be contained in this prospecting right or such other rights as may be granted to, acquired by or conferred upon it by any other applicable law.
- 7.2. Prospecting operations in the prospecting area must be conducted in accordance with the Prospecting Work Programme and the approved Environmental Management Plan and any amendment thereof.
- 7.3. The Holder shall not trespass or enter into any homestead, house or its curtilage nor interfere with or prejudice the interests of the occupiers and/or owners of the surface of the Prospecting Area except to the extent to which such interference or prejudice is necessary for the purposes of enabling the Holder to properly exercise the Holder's rights under this prospecting right.
- 7.4. The holder must, in the event that a mining right is granted in terms of section 23(1) of the Act, beneficiate or facilitate such beneficiation of uranium ore in the Republic of South Africa.
- 7.5. The beneficiation or facilitation referred to in clause 7.4, must be carried out in conjunction with the Nuclear Energy Corporation of South Africa (Pty)Ltd (NECSA).

8. Mortgage, Cession, Transfer, and Alienation.

This prospecting right, a shareholding, an equity, an interest or participation in the right or joint venture, or a controlling interest in a company, close corporation or joint venture, may not be encumbered, ceded, transferred, mortgaged, let, sublet, assigned, alienated or otherwise disposed of without the written consent of the Minister, except in the case of a change of controlling interest in listed companies.

9. Protection of Boreholes, Shafts, adits and Excavations.

All boreholes, prospecting shafts, adits, excavations, sunk or made, by the Holder during the currency of this prospecting right shall be sealed, closed, fenced, made safe by the Holder in accordance with the approved Environmental Management Plan, the Mine Health and Safety Act, 1996 or any other applicable laws and regulations.

10. Holder's Liability for payment of Compensation for Loss or Damage

- 10.1. The Holder shall, during the tenure of this right while carrying out the prospecting operations under this prospecting right, take all such necessary and reasonable steps to adequately

safeguard and protect the environment, the prospecting area and any person/s using or entitled to use the surface of the prospecting area from any possible damage or injury

- 10.2. Should the holder fail to take reasonable steps referred to above, and to the extent that there is legal liability, the holder shall compensate such person or persons for any damage or losses, including but not limited to damage to the surface, to any crops or improvements, which such person or persons may suffer as a result of, arising from or in connection with the exercise of his/her rights under this prospecting right or of any act or omission in connection therewith;
- 10.3. Neither the Minister, nor the State, shall be liable for any damage or loss of whatsoever nature that may occur or result from any prospecting activities in terms of this Prospecting Right.

11. Inspection of Prospecting Area

The Minister and/or any person duly authorised thereto in writing by the Minister shall be entitled to inspect the prospecting area, the Holder's prospecting operations and the execution of the approved Environmental Management Plan on the Prospecting Area as provided for in the Act, and any instruction conveyed in writing by the Minister to the Holder requiring the proper performance by the Holder of the Holder's obligations under this prospecting right shall be put into effect by the Holder in terms of the Act.

12 Cancellation or Suspension

- 12.1. Subject to section 47 of the Act, the Minister may cancel or suspend this right if the Holder:
- 12.1.1 Submits inaccurate, incorrect and or misleading information in connection with any matter required to be submitted under the Act;
- 12.1.2 Fails to honour or carry out any agreement, arrangement, or undertaking, including, where applicable, the undertaking made by the Holder in terms of the Broad Based Socio Economic Empowerment Charter and Social and Labour plan, on which the Minister relied for the granting of this right;
- 12.1.3 Breaches any material term and condition of this prospecting right;
- 12.1.4 Conducts prospecting operations in contravention of the provisions of the Act;
- 12.1.5 Contravenes the requirements of the approved Environmental Management Plan; or
- 12.1.6 Contravenes any provisions of this Act in any other manner.
- 12.2 Before the Minister cancels or suspends this right, the Minister must:
- 12.2.1 Give a written notice to the Holder indicating the intention to suspend or cancel this right;
- 12.2.2 Give reason/s why the Minister is considering the suspension or cancellation of this right;
- 12.2.3 Give the Holder 30 days to show reasons why the right should not be suspended or cancelled;
- 12.2.4 Notify the mortgagee, [if any] of the intention to suspend or cancel this prospecting right; and
- 12.2.5 Direct the holder, where it is possible to remedy a contravention, breach or failure, to take specified measures to remedy such contravention, breach or failure to comply.

- 12.3. If the Holder does not take the measures as specified by the Minister to remedy a contravention, breach or failure, and after having considered any representations by the holder in terms of clause 12.2.3, the Minister may suspend or cancel this right.

13. Records and Returns

- 13.1. The Holder shall maintain all such books, plans and records in regard to prospecting operations on the Prospecting Area as may be required by the Act and shall furnish to the office of the Regional Manager such reports and documents as may be relevant under this right.
- 13.2. The Holder shall annually furnish to the Regional Manager progress reports contemplated in section 21 (1) (b) of the Act in such a manner and on such timeframes as prescribed by Regulation 8.
- 13.3. The Holder shall furthermore at the end of each year following commencement of this prospecting right, inform the Regional Manager in writing of any new developments and of the future prospecting activities of the mineral/s on the Prospecting Area.

14. Minister's Liability for Payment of Compensation

The Minister shall not at any time be liable or responsible for the payment of compensation of whatever nature to the Holder, the Holder's successors-in-title or assigns, or any other person, as a result of the granting of this prospecting right.

15. Compliance with the laws of the Republic of South Africa

The granting of this right does not exempt the Holder and its successors in title and/or assigns from complying with the relevant provisions of the Mine Health and Safety Act, 1996, (Act no.29 of 1996) and any other relevant law in force in the Republic of South Africa.

16. Provisions relating to section 2(d) of the Act

In the furthering of the objects of this Act, the Holder is bound by, where applicable, the provisions of an agreement or arrangement dated - - - entered into between the Holder/empowering partner and - (the empowerment partner) which agreement or arrangement was taken into consideration for purposes of compliance with the requirements of the Act and or Broad Based Economic Empowerment Charter developed in terms of the Act and such agreement shall form part of this right.

17. Severability

Notwithstanding anything to the contrary, any provision of this prospecting right which is contrary to any provision of the Act or which is otherwise ultra vires, null and void, voidable, or unenforceable, shall be severable from the rest of this Right, such rest thus being and remaining of full force, effect and enforceability.

18. Domicilia citandi et executandi

18.1. The parties hereto choose the following addresses as their *domicilia citandi et executandi* and for all purposes arising from this prospecting right, in particular for the purposes of serving of any notice in terms of this prospecting right, and any notice properly addressed to the under-mentioned postal addresses of the parties shall be deemed to have been received by the addressee within 14 days if given in writing and posted by registered post addressed to the addressee at the relevant postal address:

18.1.1. In the case of the Minister:

Physical Address	Postal Address
101 DORP STREET POLOKWANE Code 0699 Tel (015) 287 4700 Fax (015) 287 4729	PRIVATE BAG X 9467 POLOKWANE 0700

18.1.2. In the case of the Holder:

Physical Address	Postal Address
Old Trafford 4, Isle of Houghton, Boundry Road HOUGHTON Code 2198 Tel (011) 481 2965 Fax (011) 484 0198	P O Box 61386 MARSHALLTOWN 2107

18.2. Notwithstanding anything to the contrary herein contained, a written notice or communication actually received by a party at any place other than the chosen *domicilia citandi et executandi* shall constitute adequate notice or communication to the party notwithstanding that it was not sent to or delivered at such party's chosen *domicilium citandi et executandi*.

18.3. Either party shall be entitled from time to time to change the *domicilia citandi et executandi* or postal address furnished above after giving at least 14 days prior *written* notice of such change to the other party, failing which the above-mentioned addresses will remain in force.


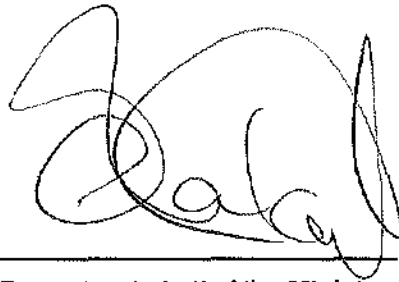
18.4 Any written notice or communication contemplated in this clause which is forwarded by one party to the other by registered post will be presumed to have been received by the addressee on the fourteenth [14] day following the date of posting from an address within the Republic of South Africa to the addressee at the postal address of the addressee for the time being as determined in accordance with the provisions of this clause.

19. Costs

The Holder shall pay all costs and charges incurred in connection with the execution and registration of this prospecting right.


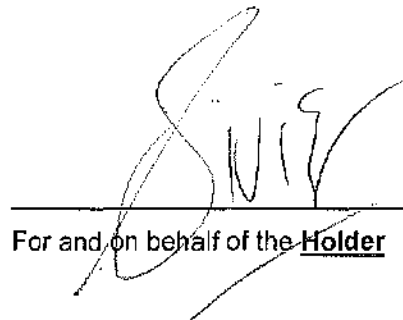
Thus done and signed at **POLOKWANE** on the **10** day of **OCTOBER** in the year **2006** in the presence of the undersigned witnesses:

AS WITNESS:



_____

For and on behalf of the **Minister**

AS WITNESS:


_____

For and on behalf of the **Holder**



Notary Public



APPENDIX B: EAP CURRICULUM VITAE AND REGISTRATION

CURRICULUM VITAE



ALESSANDRA (ALEX) PHEIFFER

SENIOR ENVIRONMENTAL CONSULTANT

Environmental Management, Planning and Approvals, Africa

QUALIFICATIONS

BSc	1998	Biological Sciences
BSc (Hons)	1999	Zoology
MSc	2004	Environmental Management

EXPERTISE

- Permitting and Licensing Processes
- Stakeholder Engagement
- Compliance Auditing
- Due Diligence and Reviews
- Screening and Risk Assessments
- Financial Provision and Closure Planning

Alex has 16 years' experience in the field of Environmental Management. She has managed a wide range of permitting and licensing projects including environmental, water, waste and air licensing and assessment processes mainly in the exploration, mining and industrial sectors. These included project management and co-ordination; specialist and engineering team management; co-ordination, facilitation and undertaking of stakeholder engagement processes including for contentious projects, and environmental assessment. She has experience in addressing both in-country legislation and Equator Principles and International Finance Corporation (IFC) requirements.

Alex has provided environmental specialist input on a number of pre-feasibility studies linked to the exploration/development/expansion of mining operations. She has also been involved in policy drafting, environmental due diligence processes, environmental reviews for financing institutions (in the mining, industrial and alternative energy sectors), compliance auditing, general environmental management support to operating sites, site screening exercises, risk assessments and financial provisioning and closure planning.

In her early career years, Alex held a position within Anglo Platinum's Waterval Smelter as Assistant to the Chief Environmental Officer. During the period March 2015 to October 2016, Alex held the position of Operations Manager: Environmental Management, Planning and Approvals (EMPA) within SLR Africa and was responsible for co-ordinating SLR's environmental management team.

PROJECTS

CHROME	
2007	Project Manager: EMPs (including an EIA) for prospecting on the farms Beestekraal 290 JQ, Boschpoort 284JQ, Nooitgedacht 289JQ and Nooitgedacht 287JQ near Rustenburg in the North West Province: Bakgatla Ba Kgafela Tribal Authority
2005	Project Manager: EMPs (including EIA) for two prospecting projects on the town and town lands of Rustenburg 272JQ in Rustenburg Magisterial District, North West Province: Xstrata South Africa (Pty) Ltd
2003-2004	Project Assistant: EIA/EMP for a chrome mine and concentrator in the Rustenburg / Boshhoek region: SA Ferrochrome and Mining (Pty) Ltd

COAL	
Current	Project Manager: EIA/EMP for a greenfields coal mine in northern Kwa-Zulu Natal: Commissiekraal Coal (Pty) Ltd
COPPER	
Current	Project Reviewer: ESIA for the Kitwe tailings retreatment and mineral processing project in Zambia: Horizon Mining
2014	Project Reviewer: EIA/EMP amendment for the Kinsenda operations in the DRC.
2013	Project Reviewer: EIA for a greenfields copper oxide project (Omitiomire project) (Namibia): Craton Mining and Exploration (Pty) Ltd
FERROCHROME	
2013	Project Manager: EIA/EMP amendment for the exclusion of smelter activities at Bokfontein Chrome Mine: HERNIC Ferrochrome
2012	Project Manager: EIA/EMP amendment for a concentrator and smelter complex at Bokfontein Chrome Mine: HERNIC Ferrochrome
2003-2004	Project Assistant: EIA for Project Lion, a new smelter complex near Steelpoort: Xstrata South Africa (Pty) Ltd
2002-2003	Project Assistant: EIA/EMP for Transvaal Ferrochrome Project (a ferrochrome smelter complex in the Rustenburg/Brits region):
2002-2003	Project Manager: EIA/EMP amendment for a pelletizing plant at Xstrata Wonderkop: Xstrata South Africa (Pty) Ltd
GOLD	
Current	Project Reviewer: EIA for the refurbishment of an existing shaft and related mineral processing and residue disposal facilities: Taung Gold
2016	Project Reviewer: Annual update of the Damang EMP and reclamation plan: Abosso Goldfields Limited
2012	Project Manager: EIA for a filtration plant at Navachab Gold Mine (Namibia): AngloGold Ashanti Namibia (Pty) Ltd
2011	Project Reviewer: Basic Assessment for Diesel storage facilities at its South Deep Mine Operations: Gold Fields (South Africa) (Pty) Ltd
2009	Part of a peer review delegation for an ongoing EIA: Participation in an integrated environmental management review – technical workshop for new projects at Gold Fields: Gold Fields (South Africa) (Pty) Ltd
2005-2007	Project Manager: Consolidating South Deep Min’s various EMPR documents into one document and in turn bringing the mine’s EMPR in line with the requirements of the Mineral and Petroleum Resources Development Act and supporting

	regulations : Placer Dome Westonaria Joint Venture – South Deep Mine
2005-2007	Project Manager: EIA and EMP amendment for a new tailings dam development: Placer Dome Westonaria Joint Venture – South Deep Mine
IRON	
2016	Project Reviewer: EIA and EMP for the Jenkins and Driehoekspan greenfields mining operations in the Northern Cape: Coza Iron Ore
2012	Project Manager: EIA/EMP for greenfield iron ore mine development near Lephalale (Ellisras) (Moonlight iron ore project) in the Limpopo Province: Turquoise Moon Trading (Pty) Ltd
2010	Project Manager and Reviewer: Amendment to existing prospecting EMP to cater for changes in prospecting operations: Nelesco 684 (Pty) Ltd
2010	Project Manager and Reviewer: Amendments to existing prospecting EMPs (Cascade 442IT and Delft 22HU) to cater for changes in prospecting operations: Mkhombi Mining (Pty) Ltd
2009	Project Manager and Reviewer: Management of the consultation process for a prospecting EMP on the farms Sterkfontein 419IT and Wolvernkop 427IT, near Piet Retief in Mpumalanga Province: Mkhombi Mining (Pty) Ltd
2009	Project Manager: EMP (including EIA) for prospecting on the farms Moabsvelden 248IR and Rietkuil 249IR, near Delmas in Mpumalanga Province: Spirapix Mining (Pty)
MANGANESE	
Current	Project Reviewer: a number of EMP amendment and rectification processes for Tshipi é Ntle Manganese Mining operations in the Northern Cape
Current	Project Reviewer: EMP amendment and rectification processes for UMK Manganese Mine in the Northern Cape
2017	Project Reviewer: EIA and EMP for a greenfields mining right application in the Northern Cape: Khwara Mining
2016	Project Reviewer: EIA and EMP for a greenfields mining right application in the Northern Cape: Ntsimbintle Mining (Pty) Ltd
2008 and 2016	Project Reviewer: EMP performance assessment and financial provision re-assessment for prospecting right in the Northern Cape: Ntsimbintle Mining (Pty) Ltd
PLATINUM	
Ongoing	Project Manager and Reviewer: Various EMP performance assessments and financial provision re-assessments for prospecting rights held by Impala in the North West, Mpumalanga and Limpopo Province: Impala Platinum Limited (Impala)
Ongoing	Project Manager: Various amendments to existing prospecting EMPs to cater for

	the changes in prospecting operations: Impala Platinum Limited (Impala)
Ongoing	Project Manager and Reviewer: Various EMP performance assessments and financial provision re-assessments for prospecting rights held by Afplats, Inkosi and Imbasa in the North West Province
Current	Project Reviewer: EIA and EMP for the relocation of a security perimeter and infrastructure footprint expansion at a BMR and Smelter complex in the Limpopo Province: Northam Platinum
2015-2016	Project Reviewer: EIA and EMP amendment including WML for changes to surface infrastructure and operations at Bakubung Platinum Mine, North West Province
2012-2015	Project Reviewer: EIA and EMP amendment for changes to surface infrastructure and operations at Tharisa Mine, North West Province
2014	Project Reviewer: EMP Compliance Audit for Leeuwkop Mine
2013	Project Manager and Reviewer: EIA/EMP amendment for changes to surface infrastructure at Marula Platinum Mine: Marula Platinum (Pty) Ltd
2013	Project Reviewer: EIA/EMP for the extension of underground mining activities at Everest Platinum Mine (Fairway project): Aquarius Platinum (South Africa) (Pty) Ltd
2013	Project Manager: EIA/EMP for the extension of mining activities at Everest Platinum Mine (Hoogland project): Aquarius Platinum (South Africa) (Pty) Ltd
2011	Project Co-ordinator: Supply and co-ordination of interim on-site environmental manager to assist with general management of environmental aspects at Everest Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd
2010	Project Reviewer: Compilation of environmental documents (including a public consultation process) in support of a closure application for the Turffontein 263JQ and Kookfontein 265JQ prospecting right and Reinkoyalskraal 278JQ and Elandsheuwel prospecting right: Impala Platinum Limited (Impala)
2010	Project Reviewer and Auditing: 2010 Annual Re-Assessments of Everest Platinum Mine's closure cost estimate: Aquarius Platinum (SA) (Pty) Ltd
2010	Project Reviewer: EMP (including EIA) for prospecting on the farm Rooikraal 118JS in the Limpopo Province: Braggite Resource (Pty) Ltd
2009	Project Manager: 2009 Annual Re-Assessments of Everest Platinum Mine's closure cost estimate: Aquarius Platinum (SA) (Pty) Ltd
2009	Project Manager and Closure: EIA/EMP amendment for the north and south boxcuts at Everest Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd
2009	Project Reviewer: EIA/EMP amendment for the production expansion of Eland Platinum Mine: Xstrata South Africa (Pty) Ltd
2008-2009	Project Manager: Assistance with the consultation with landowners to input into closure of a prospecting right: Impala Platinum Limited (Impala)

2008	Project Manager: Compilation of environmental posters linked to the seismic EMP for the use in environmental awareness training: Impala Platinum Limited (Impala)
2008	Project Manager and Reviewer: EMP performance assessment of Marula Platinum Mine's EMP report: Marula Platinum (Pty) Ltd
2007-2008	Project Manager: EIA/EMP for a new platinum mine and concentrator Plant (Mphahlele Project) in the Limpopo Province: Tameng Mining and Exploration (Pty) Ltd
2006-2009	Project Manager: EIA/EMP amendment for additional infrastructure at Everest Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd
2006-2008	Project Manager: EIA/EMP for seismic survey activities near Impala's Rustenburg operations: Impala Platinum Limited (Impala)
2006-2008	Project Manager: EIA/EMP amendment for a new shaft and associated facilities and Marula Platinum Mine. This project also included the consolidation and updating of the mine's EMP to cater for the changes in mining legislation: Marula Platinum (Pty) Ltd
2005	Project Manager: EMP (including an EIA) for prospecting on the farms Turffontein 263JQ, near Impala's Rustenburg Operations: Impala Platinum Limited (Impala)
2005	Project Manager: EMP (including an EIA) for prospecting on the farm Reinkoyalskraal 278JQ, near Impala's Rustenburg Operations: Impala Platinum Limited (Impala)
2005	Project Manager: EMP (including and EIA) for prospecting on the farms Klipgatkop 115JQ, near Impala's Rustenburg Operations: Impala Platinum Limited (Impala)
2005	Project Manager: EMP (including and EIA) for prospecting on the farms, Doornspruit 84JQ and Roodekraalspruit 113JQ near Impala's Rustenburg Operations: Impala Platinum Limited (Impala)
2005	Project Manager: EIA/EMP for a mining right application (The Fingers Project) at Marikana Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd
2004	Project Manager: Assisted in the facilitation of the public involvement process for the Shaft 20 EMP amendment: Impala Platinum Limited (Impala)
2003-2004	Project Manager: EMP amendment for the Maandagshoek Winze Project (re-establishment of an underground shaft): Modikwa Platinum Mine
2002-2005	Project Manager: EIA/EMP amendment for the Opencast Mining Project at the Rustenburg operations: Impala Platinum Limited (Impala)
2002-2003	Project Manager: EMP amendment for The Hills Project (establishment of additional infrastructure for mining purposes): Modikwa Platinum Mine
2002-2003	Project Assistant: EIA and EMP for a greenfields mine – Everest South Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd

2002	Project Assistant: Drilling and bulk sampling EMPs for the Everest South Project: Aquarius Platinum (SA) (Pty) Ltd
2002	Project Assistant: Revised bulk sampling EMP for the Everest South Project: Aquarius Platinum (SA) (Pty) Ltd
2001	Project Manager: EMP amendments for re-positioning of infrastructure for Marikana Platinum Mine: Aquarius Platinum (SA)
RESIDENTIAL, FOOD and BEVERAGE	
2017	Technical E&S Lead: Fatal flaw analysis/site selection screening for a food and beverage developments in Gauteng
2016	Project Manager: Provision of environmental management support to Kumba Iron Ore for the relocation of Dingleton town
2015	Project Reviewer: Basic Environmental process for the Pilanesburg Platinum Mine Housing Development, in the North West Province
2001-2002	Project Assistant: EIA for a village and cemetery for non-landowners to be relocated from the site of Marikana Platinum Mine: Aquarius Platinum (SA) (Pty) Ltd
SILICA AND SAND	
Current	Project Reviewer: EIA/EMP for a mining right application for sand quarry along the Vaal River, in the Free State: Goosebay (Pty) Ltd
2005-2006	Project Manager: EIA/EMP for mining right application at Rietvly Silica Mine: Xstrata South Africa (Pty) Ltd
URANIUM	
2009-2016	Project Manager: ESIA for a greenfields Uranium and Coal Mine in Botswana (Letlhakane Project): A-Cap Resources Limited
ALTERNATIVE ENERGY	
2012	Project Manager: EIA/EMP amendment for the use of alternative fuels at its Lichtenburg Cement Plant: Lafarge Industries SA (Pty) Ltd
2008-On-hold	Project Manager: EIA for cogeneration power plants at Xstrata’s operations in the North West and Mpumalanga Provinces: Power Tech IST/ Xstrata South Africa (Pty) Ltd
INDUSTRY	
2016	Project Reviewer: Basic assessment and Air Emission License for a minerals siding in Bloemfontein: Three clients
BIOREMEDIATION	
2017	Facilitation of DEA bioremediation process for a residential area in the Northern

	Cape
2013-2015	Project Manager: EIA for a waste management license for the bioremediation operation at TransHex Baken Diamond mine in the Northern Cape
CLOSURE PLANNING	
2017	Completion of the environmental and social aspects of the Closure Plan for B2Gold’s mine in Namibia: B2Gold Namibia
OTHER: EXPERT CONSULTANT, DUE DILIGENCE, REVIEWS, RISK ASSESSMENT	
2016-2017	Environmental Specialist: Environmental management services in fulfilment of the environmental legal obligations for the Dingleton Resettlement Project, near Kathu in the Northern Cape
2016	Environmental Specialist: Environmental and Social Due Diligence Review of two wind farm assets located in South Africa
On-going	Environmental Specialist: Environmental input into various pre-feasibility studies linked to the exploration/development/expansion of mining operations.
2015	Environmental Specialist: Legal compliance review of Everest Platinum Mine (Mpumalanga) in support of re-commencing operations
2015 & 2016	Environmental Specialist: Update to Tharisa Mine’s Competent Persons Report
2015	Project Manager: Alfred Knight Lab Due Diligence
2012 and 2013	Environmental Specialist: Due diligence on compliance, water, waste and air related aspects as part of an investment investigation at Silicon Technology (Pty) Ltd
2013	Environmental Specialist: A number of due diligences of gold exploration projects in Tanzania: New African Mining Fund
2012	Environmental Specialist: Input to a legal environmental register for African Barrick Gold’s operations in Tanzania
2012	Environmental Specialist: Peer Review of baseline specialist studies for Gold Fields Damang Gold Mine
2011	Environmental Specialist: Afplats Shaft Risk Assessment Update for Inkosi - Imbasa
2011	Environmental Specialist: Review of Barrick Tulawaka Tailings EIA
2010	Expert Consultant: Environmental input into the ESIA for the expansion of the Morupule Colliery in Botswana: Ecosurv Environmental Consultants
POLICY DRAFTING	
2008	Project Manager: Assistance with drafting a policy, guideline document and procedure for stakeholder participation during explorations operations for the Implats Group: Impala Platinum Limited (Impala)

WATER	
On-going	Project Reviewer: Of a number of water use license applications for mining operations across South Africa
2013	Project Manager: Assistance in compilation of water use license application (WULA) and integrated water and waste management plan (IWWMP) for a new platinum mine and concentrator plant (Mphahlele Project) in the Limpopo Province: Tameng Mining and Exploration (Pty) Ltd
2012	Project Reviewer: Co-ordination of integrated water and waste at Everest Platinum Mine: Aquarius Platinum (South Africa) (Pty) Ltd
2011	Project Manager: Water Supply Study for the Moonlight Iron Ore Project: Turquoise Moon Trading (Pty) Ltd
2011	Project Manager: ESIA for a greenfields wellfield development in Botswana (to supply the Letlhakane Project): A-Cap Resources Limited
2010	Project Reviewer: Re-registration of waste-related water uses at Everest Platinum Mine: Aquarius Platinum (South Africa) (Pty) Ltd
2010	Project Reviewer: Assistance with addressing water use license related issues: Marula Platinum (Pty) Ltd
2010	Project Manager: Water use license application (WULA) for the South Deep Doornpoort tailings dam
2006	Project Manager: Compilation of water use license application (WULA) and integrated water and waste management plan (IWWMP) for South Deep Mine:
Cancelled	Project Reviewer: Basic assessment for a water supply project to the Pilanesberg Platinum Mine Operations: Pilanesberg Platinum Mines (Pty) Ltd
MEMBERSHIPS	
PrSciNat	Registered with the South African Council for Natural Scientific Professions as a Professional Natural Scientist (PrSciNat) in Environmental Science (Reg. No. 400183/05)
EAPAN	Registered with the Environmental Assessment Professionals of Namibia (EAPAN) as a Lead Practitioner (Membership No. 121)
IAIA	Member of the International Association for Impact Assessments (IAIA), South African Affiliate since 2005
PUBLICATIONS	
As part of Masters Dissertation	Onderstepoort Journal of Veterinary Science, 2005. "Aspects of the ecology of the Asian tapeworm <i>Bothriocephalus acheilognathi</i> Yamaguti, 1934 in yellow fish in the Vaal dam, South Africa"



herewith certifies that

Alessandra Pheiffer

Registration number: 400183/05

is registered as a

Professional Natural Scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)

in the following field(s) of practice (Schedule 1 of the Act)

Environmental Science

Effective 26 July 2005

Expires 31 March 2019



A handwritten signature in black ink, appearing to read 'Botha', written over a horizontal line.

President

A handwritten signature in black ink, appearing to read 'M. J. ...', written over a horizontal line.

Executive Director

CURRICULUM VITAE



CAITLIN HIRD

ENVIRONMENTAL ASSESSMENT PRACTITIONER

EMPA, South Africa

QUALIFICATIONS

Honours Degree 2010

Honours Degree in Environmental Economics (University of Cape Town)

EGS 2009

Degree in Environmental & Geographical Sciences (EGS) (University of Stellenbosch)

EXPERTISE

- Legal Permitting
- Project Management
- Environmental Impact Assessments for mineral extraction operations and industrial development projects
- Report compilation
- Stakeholder engagement management
- Management of specialists

Caitlin is a Project Manager with SLR and is responsible for SLR's EIA projects throughout Southern Africa. Caitlin has 8 years' experience within the Minerals and Industrial sectors, 4 years of which have been in a management position.

Caitlin has managed and assisted in the management of a range of Environmental Impact Assessment projects for major mineral developments throughout Southern Africa for many of the key operators within the minerals industry. Since 2011 Caitlin has managed 6 full scope Environmental Impact Assessments processes and has assisted in the management of other major Environmental Impact Assessments for minerals extraction operations.

Prior to joining SLR in 2011, Caitlin studied at the University of Stellenbosch after which she completed her Honours in Environmental Management and Economics at the University of Cape Town.

PROJECTS

Key aspects of Caitlin's recent project experience are summarised below.

The environmental permitting process associated with a processing plant for AB InBev & CCBSA, Gauteng, (2018)

Project Manager. Compilation of basic assessment report. The management of the stakeholder engagement process and specialists.

The environmental permitting process associated with amendments to Craton Mining's Omitomire Copper Mine, Namibia (2018)

Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme amendment report. The management of the stakeholder engagement process and specialists.

<p>The environmental permitting process associated with amendments to the Taung Gold Evander Shaft 6 Mine, Mpumalanga (2018)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme amendment reports. The management of the stakeholder engagement process and specialists.</p>
<p>Post-construction Audit for the Taung Gold Evander Shaft 6 Mine, Mpumalanga (2018)</p>	<p>Project Manager. Compilation of audit report.</p>
<p>Prospecting Right Renewal for the Afplats Wolwe-Karee operation, North-West (2018)</p>	<p>Project Manager. Compilation of PR renewal report.</p>
<p>Prospecting EMP Performance Assessment and Financial Provision Update for Marula Platinum’s Hackney operation, North-West (2017)</p>	<p>Project Manager. Compilation of EMP performance assessment and closure liability update.</p>
<p>Prospecting EMP Performance Assessment and Financial Provision Update for Inkosi Platinum’s Greater Inkosi Area, North-West (2017)</p>	<p>Project Manager. Compilation of EMP performance assessment and closure liability update.</p>
<p>Prospecting EMP Performance Assessment and Financial Provision Update for Imbasa Platinum, North-West (2017)</p>	<p>Project Manager. Compilation of EMP performance assessment and closure liability update.</p>
<p>The environmental permitting process associated with a new ferrochrome smelter for Siyanda Chrome Smelting Company, Limpopo (2014-2017)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme reports and WUL. The management of the stakeholder engagement process and specialists.</p>

<p>The environmental permitting process associated with a new mining right, mining right amendment and WUL for Kudumane Manganese Resources, Northern Cape (2013-2017)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme reports and WUL. The management of the stakeholder engagement process and specialists.</p>
<p>The environmental permitting process associated with the proposed Coza (Jenkins Section) Mine, Northern Cape (2016)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme reports. The management of the stakeholder engagement process and specialists.</p>
<p>The environmental permitting process associated with a Section 102 Consolidation at Shanduka Colliery, Kwazulu-Natal (2014-2015)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme reports. The management of the stakeholder engagement process and specialists</p>
<p>The environmental permitting process associated with a Section 102 amendment for Keaton Mining, Mpumalanga (2014)</p>	<p>Project assistant. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with an EIA/EMP Amendment at Herculite Ferrochrome, North-West (2012-2013)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with a Prospecting EMP Amendment at Inkosi Platinum, North-West (2012)</p>	<p>Project manager. Compilation of Prospecting EMP amendment report. Assistance with stakeholder engagement.</p>
<p>The environmental permitting process associated with a Fluorspar Bulk Sampling EMP Amendment for SA Fluorite, North-West (2012)</p>	<p>Project manager. Compilation of bulk sampling EMP amendment report. Assistance with stakeholder engagement.</p>

<p>The environmental permitting process associated with the expansion of the Shaft 16 Waste Rock Dump and new Pit8C for Impala Platinum, North-West (2012)</p>	<p>Project Manager. Compilation of scoping and environmental impact assessment and environmental management programme reports. The management of the stakeholder engagement process and specialists.</p>
<p>The environmental permitting process associated with a Section 102 amendment at Herculite Ferrochrome, North-West (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with a mining right application for Leeuw Mining and Exploration, Kwazulu-Natal (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with a Mining Right amendment for Turquoise Moon, Limpopo (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with a Mining Right amendment for Keaton Energy, Mpumalanga (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process associated with the Tuschenkomst Pit Extension at Pilansberg Platinum Mine, North-West (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>
<p>The environmental permitting process the new Mining Right Application at the Everest Hoogland Platinum Mine, North-West (2011)</p>	<p>Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.</p>

The environmental permitting process associated with the new salvage yard at Impala Platinum, North-West (2011)

Project assistant. Assistance with the compilation of the basic assessment report. Assistance with the stakeholder engagement process.

The environmental permitting process associated with the Swakop Uranium, Namibia (2011)

Project assistant. Assistance with the compilation of the environmental impact assessment and environmental management programme report. Assistance with the stakeholder engagement process.

CURRICULUM VITAE



CLIVE PHASHE

JUNIOR ENVIRONMENTAL CONSULTANT

Environmental Management, Planning and Approvals,
Africa

QUALIFICATIONS

BSc Hons	2018	BSc Honours in Environmental Management from University of South Africa
BSc	2016	Life and Environmental Sciences (with Geology and Environmental Management Major from University of Johannesburg

EXPERTISE

- Stakeholder Engagement
- Public Participation Processes

Clive is a Junior Environmental Consultant with SLR and has over 2 years' experience within the environmental consulting field. Clive has assisted in a variety of mining projects since joining the company.

PROJECTS

West Wits Mine (Current)	Project Assistant: (EIA/EMP) for the West Wits mining right application in Gauteng: West Wits MLI (Pty) Ltd.
Project Jordan (2017-2019)	Project Assistant: Basic Assessment Report for Project Jordan, a new Maize Wet Mill Plant in Vereeniging.
Northam Platinum (2017)	Project Assistant: EIA and EMP for the relocation of a security perimeter and infrastructure footprint expansion at a BMR and Smelter complex in the Limpopo Province: Northam Platinum

APPENDIX C: STAKEHOLDER ENGAGEMENT

Undertaken by SLR

- DMR pre-application meeting minutes (including presentation).
- NEMA application, proof of application fee payment, and acknowledgement of receipt from the DMR.
- MPRDA Closure Form P.
- Correspondence with the land claims commissioner.
- Newspaper advertisement placed in the Steelburger.
- Site notice (including photographic record and map illustrating the location of the site notices).
- Background Information Document (BID) in English and Sepedi and proof of distribution (emails & SMS).
- Written comments received from I&APs.
- Telephonic record of call with Hackney chief Kgoshi Mashabela.
- Copy of I&AP database.

Undertaken directly by Marula

- Meeting minutes (17 September 2018) from meeting between Marula and Hackney Development Committee (includes agenda and attendance register) in which the community was advised of Marula's intent to withdraw from the Hackney prospecting right
- Memorandum of Understanding (MOU) between Marula and Kgoshi Mashabela (Hackney Chief) signed on 17 September 2018
- Email to Mr Abram Lapatla (15 November 2018) notifying of Marula's intent to withdraw from Hackney prospecting right
- Email response from Mr Abram Lapatla (28 February 2019)



MARULA PLATINUM (PTY) LTD

ENVIRONMENTAL AUTHORISATION PROCESSES FOR THE PROPOSED CLOSURE OF THE HACKNEY AND DRIEKOP AREA A PROSPECTING RIGHTS, EXCLUSION OF THE HACKNEY PROSPECTING AREA FROM MARULA'S MINING RIGHT AREA AND THE INCLUSION OF A NEW VENTILATION SHAFT INTO MARULA'S MINING RIGHT AREA

DEPARTMENT OF MINERAL RESOURCES RE-APPLICATION MEETING MINUTES

DATE	10 February 2019
VENUE:	DMR offices in Polokwane
SLR COMPANY:	SLR Consulting (Africa) (Pty) Ltd (SLR)
PROJECT NUMBER:	710.09002.00016
PURPOSE:	The purpose of the meeting was to: <ul style="list-style-type: none">• Provide an overview of the project area• Provide an overview of the proposed applications• Provide an overview of the existing status of the environment• Provide a list of potential environmental impacts• Provide an overview and obtain input into the proposed public participation process
ATTENDANCE:	An attendance register is presented in Appendix 1.

1. OPEN AND INTRODUCTION

The meeting was opened with introductions by Thivulawi Kolani of the Department of Mineral Resources (DMR), Murendeni Makhado of Marula Platinum (Pty) Ltd (Marula) and Caitlin Hird and Gugu Dhlamini of SLR Consulting (Africa) Pty Ltd (SLR).

2. PRESENTATION

Caitlin Hird gave a presentation which provided an overview of the proposed project area and the related environmental authorisation application processes. A copy of the presentation is included in Appendix 2.

3. DISCUSSION

Following the presentation, a discussion regarding the various applications was held. The outcome of the discussion is outlined below.

Process 1: Closure of the Hackney Prospecting Right

- DMR agreed to the public participation process outlined in the presentation and that it would be limited given the challenges to engaging with the community.
- DMR agreed that the final EMP performance assessment outlined in the presentation would be desk-based given the access issues.

- DMR requested to visit the Hackney site following the submission of the final BAR, and requested details for contact persons within the community so as to arrange this. Marula and SLR agreed to this.

Process 2: Closure of Driekop Area A Prospecting Right:

- DMR advised that since Marula holds a Mining Right over the same area and for the same minerals as the Driekop Area A Prospecting right, that this prospecting right does not need to be closed.
- SLR subsequently asked that the DMR provide this advice in writing.

Process 3: Exclusion of the Hackney 116KT Prospecting Area:

- DMR advised that amending Marula's environmental authorisation (EA) to exclude the Hackney PR area would not be necessary since this inclusion was not yet executed. This process would therefore not require its own NEMA Application form and motivation letter and could be catered for in the EMP Amendment for the vent shaft project (wherein Hackney's exclusion from Marula's approved EMPr would be reflected).

Process 4: Addition of new vent shaft (Driekop) and addition of aboveground fans at the approved Clapham vent shaft:

- DMR agreed that the proposed EMPr amendment should be dealt with in terms of Part 2 of Chapter 5 of the EIA Regulations as outlined in the presentation, given that that no additional listed activities would be triggered.
- DMR agreed that specialist noise input would be required given that the fans at the Clapham vent shaft will now be located aboveground.

4. WAY FORWARD

Caitlin Hird indicated that formal meeting minutes would be circulated to the DMR, and that contact details for the Hackney Kgosi would be provided to the DMR so that a site visit of the prospecting right area could be arranged.

5. CLOSE

Attendees were thanked for their input and for making the time to attend the meeting. The meeting was closed by Caitlin Hird.

APPENDIX 1: ATTENDANCE REGISTER

Name and Surname	Organisation	Contact numbers	E-mail
Murendeni Makhado	Marula	079 405 7754	murendeni.makhado@implats.co.za
Kolani Thivhulawi	DMR	082 818 9566	Thivhulawi.kolani@dmr.gov.za
Caitlin Hird	SLR	011 467 0945	chird@slrconsulting.com
Gugu Dhlamini			gdhlamini@slrconsulting.com

APPENDIX 2: PRESENTATION

MARULA PLATINUM (PTY) LTD

**THE CLOSURE OF THE HACKNEY AND DRIEKOP AREA A
PROSPECTING RIGHTS, EXCLUSION OF THE FARM
HACKNEY FROM MARULA'S MINING RIGHT AREA AND
THE INCLUSION OF A NEW VENTILATION SHAFT INTO
MARULA'S MINING RIGHT AREA**

**PRE-APPLICATION MEETING
WITH THE DMR**

APRIL 2019

global **environmental** and **advisory** solutions



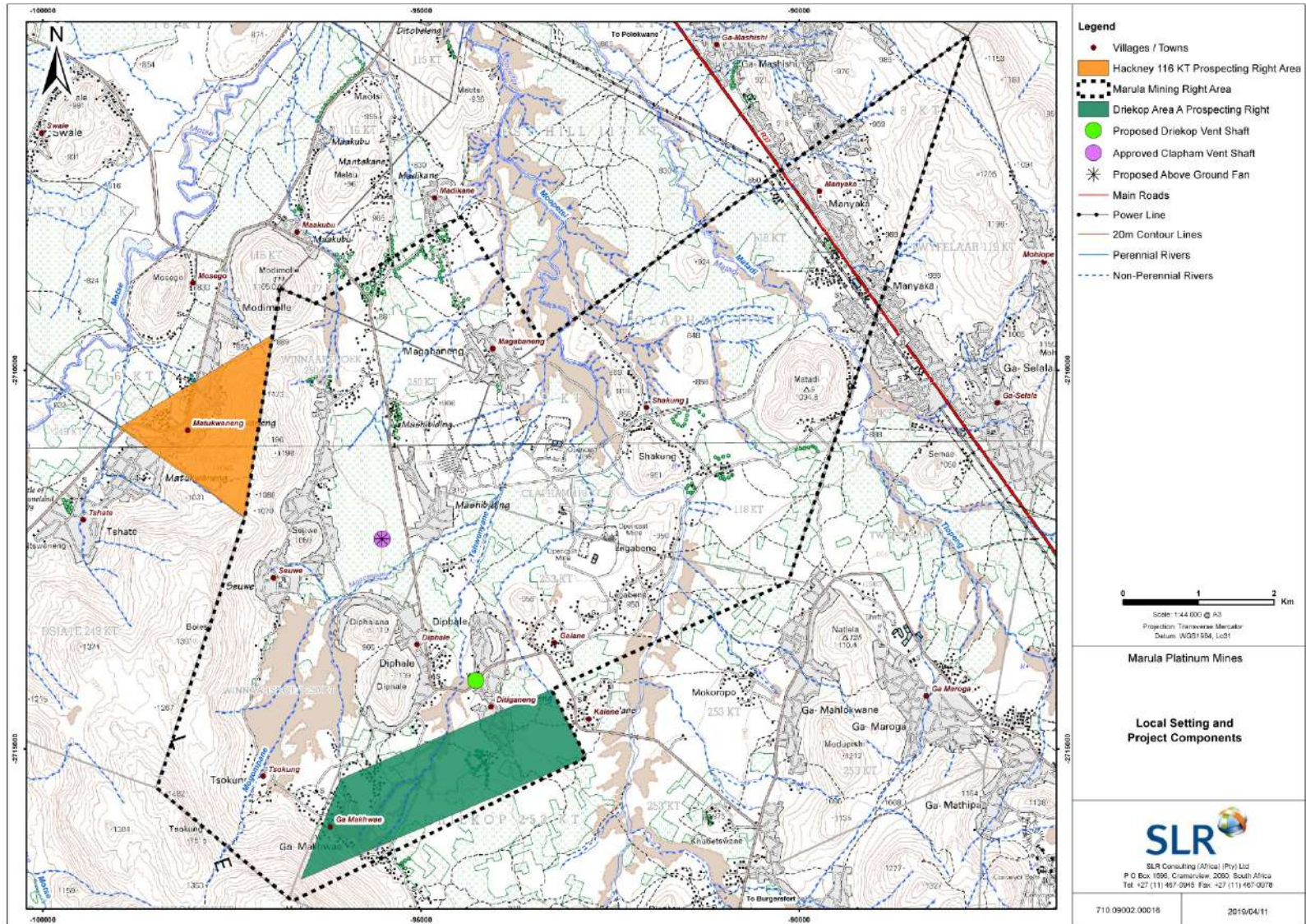
AGENDA

- Welcome and opening
- Overview of project area and the proposed environmental authorisation application processes
- Overview of the existing status of the environment
- Potential environmental impacts
- Proposed public participation process
- Timeframes
- General discussion, comments and queries
- Close

OVERVIEW OF PROPOSED APPLICATIONS

- Marula owns and operates the Marula Platinum Mine in the Greater Tubatse Local Municipality (GTLM) and Sekhukhune District Municipality (SDM) of the Limpopo Province.
- Marula is proposing to:
 1. Apply for closure of the Hackney prospecting right (PR 210).
 2. Apply for closure of the Driekop Area A prospecting right (PR 293).
 3. Apply to exclude the farm Hackney 116KT from the approved Marula environmental management programme (EMPr) (LP 30/5/1/2/3/2/1 (61 & 63) EM).
 4. Apply to develop an additional ventilation shaft to support the Driekop mining area, and to develop the already approved Clapham vent shaft (with fans aboveground instead of below ground as per the approved EMPr.

LOCAL SETTING & PROJECT COMPONENTS



1. CLOSURE OF THE HACKNEY PR (PR210)

- Prospecting activities commenced in 2007, following which 5 of 10 approved exploration boreholes were drilled.
- In 2012 community members stopped drilling and prevented Marula's access to the PR area. No prospecting activities have since taken place and drill sites have been decommissioned and allowed to re-vegetate.
- Marula wishes to close the Hackney PR and is required to submit a closure application in terms of Section 43(4) of the MPRDA.
- This triggers activity 22 in Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the NEMA is required.
- Key deliverable to the DMR (by 28 June 2019) will be a BAR inclusive of:
 - A Closure Plan
 - A risk assessment
 - A financial provision update
 - EMP Performance Assessment (desk-based review of aerial imagery, professional opinion on likely status of rehabilitation using 2012 photos and knowledge of climatic conditions since 2012
 - Closure Form (Form P)
 - NEMA Application
 - Public participation process

2. CLOSURE OF DRIEKOP AREA A PR (PR 293)

- Driekop Area A PR previously incorporated into Marula's adjacent converted mining right (DMR Ref No: LP30/5/1/2/2/61 MR).
- No further prospecting activities to be undertaken as part of the PR.
- Marula wishes to close the Driekop Area A PR and is required to submit a closure application in terms of Section 43(4) of the MPRDA.
- This triggers activity 22 of Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the NEMA is required.
- Key deliverable to the DMR (by 28 July 2019) will be a BAR inclusive of:
 - A Closure Plan
 - A risk assessment
 - A financial provision update
 - EMP Performance Assessment (based on site visit)
 - Closure Form (Form P)
 - NEMA Application
 - Public participation process

3. EXCLUSION OF THE FARM HACKNEY 116KT

- Aligned with the closure of the Hackney PR, Marula wishes to exclude Hackney from its approved environmental management programme (EMPr) (LP 30/5/1/2/3/2/1 (61 & 63) EM)
- DMR previously advised that the EA could be amended to cater for the exclusion of the farm Hackney 116KT in accordance with Chapter 5, Part 1 (non-substantive amendment) of the NEMA.
- This process requires the completion of a NEMA application form together with a motivation for the amendment.
- Submission to the DMR is planned for April 2019.

4. ADDITION OF NEW VENT SHAFT

- Marula is planning to develop an additional ventilation shaft to support the Driekop mining area and to develop the approved Clapham vent shaft (fans proposed to be located aboveground instead of underground as per approved in the EMPr).
- In terms of Section 102 of the MPRDA, the proposed Driekop ventilation shaft will require an amendment to the existing Marula EMPr (LP 30/5/1/2/3/2/1 (61 & 63) EM).
- This application for amendment of an EMPr will be dealt with in terms of Part 2 of Chapter 5 of the EIA Regulations (a substantive amendment where there are no listed activities triggered). The process to be followed must be agreed with the competent authority.
- It is understood by SLR that the Driekop ventilation shaft will be planned in a manner that does not trigger any listed activities under the EIA Regulations. How does the DMR advise that the Clapham vent shaft fan location change be handled? Specialist input?
- Key deliverable to the DMR by 28 July 2019 will be a report which satisfies the requirements of Chapter 5, Part 2 of the EIA Regulations.

ENVIRONMENTAL PROCESS (1)

Permissions required:

Application	Authorisation required	Applicable legislation	Competent authority
1 & 2. Closure of Hackney and Driekop Area A PRs	PR closure certificates	Mineral and Petroleum Resources Development Act No. 28 of 2002	Department of Mineral Resources
	Environmental authorisations	National Environmental Management Act (107 of 1998) (NEMA) 2014 EIA regulations (Listing Notice 1 is applicable)	
3. Exclusion of Hackney from Marula's approved EMPr	Amendment of Marula's EA	National Environmental Management Act (107 of 1998) (NEMA) 2014 EIA regulations (Chapter 5, part 1 application process)	Department of Mineral Resources
4. Addition of new ventilation shaft	Amendment of Marula's EMPr	Mineral and Petroleum Resources Development Act No. 28 of 2002	Department of Mineral Resources
	Environmental Authorisations	National Environmental Management Act (107 of 1998) (NEMA) 2014 EIA regulations (Chapter 5, part 2 application process)	

ENVIRONMENTAL PROCESS (2)

Regulatory authorities

- Limpopo Department of Mineral Resources (DMR)
- Limpopo Department of Economic Development, Environment and Tourism (LEDET)
- Department of Water and Sanitation (DWS)
- Limpopo Department of Agriculture and Rural Development (LDARD)
- Limpopo Department of Rural Development and Land Reform (DRDLR)
- South Africa Heritage Resource Agency (SAHRA) and/or Limpopo Heritage Resources Agency (LHRA)

Local authorities

- Greater Tubatse Local Municipality (including ward councillor)
- Sekhukhune District Municipality

EXISTING STATUS OF THE ENVIRONMENT (1)

- Geology: Project area is situated in the Bushveld Complex (BC). The BC is commonly divided into five zones representing the sequential fractional crystallization that accompanied the cooling of this magmatic body. The area in general is underlain by norite, leuconorite, anorthosite and pyroxenite of the Main and Critical Zone of the Rustenburg Layered Suite of the BIC. The Critical Zone contains the platinum group metals. The UG2 and Merensky Reefs are present and mined by Marula.
- Surface water: The project area falls within the catchment of the Motse River or quaternary catchment B71E. This catchment contributes to the Olifants River. Given the non-perennial nature of watercourses, there is no third party reliance on surface water.
- Groundwater: Pre-mining groundwater levels within the project area were on average 10mbg. It was also found that there was a direct relationship between pre-mining groundwater levels and surface topography and was typical of unconfined and semi-confined aquifers. Extensive use of groundwater by communities throughout the area as well as dewatering of the underground mine is assumed to have resulted in localised lowering of the water table. Groundwater quality is marginal to poor due to elevated nitrate concentrations.

EXISTING STATUS OF THE ENVIRONMENT (2)

- Biodiversity: The vegetation in the project area forms part of a regional complex type known as the Arid Northern Bushveld, the majority of which has been severely transformed leading to a high incidence of bush encroachment. The plant community on the hills and mountains are considered highly sensitive and some nationally threatened species may be associated with these hills. Very little evidence of wild faunal populations is associated with the general area due to the presence of mining, prospecting, farming and community activities.
- Noise: The project area is typical of a rural area with community activities and mining contributing to ambient noise levels.
- Socio-economic: The project area fall within the Burgersfort Magisterial District, the Sekhukhune District Municipality and the Greater Tubatse Local Municipality. It is estimated that approximately 40 000 people reside in the local area. Approximately 48% of the population are under the age of 14 years, while 48% are between the ages of 15 and 64 years and 4% are older than 65 years. More females than males stay in the area as males leave the area to seek employment elsewhere. As is the case for the province, the local level of education is poor.

POTENTIAL IMPACTS (VENT SHAFT)

- Loss and sterilisation of mineral resources (low, unlikely)
- Loss of or disturbance to biodiversity (depends on the final location)
- Safety risks to third parties (depends on security measures)
- Noise pollution (depends on the type of vent shaft)
- Air emissions (unlikely, as the shaft will draw air into the underground mine)
- Loss of heritage, palaeontological and cultural resources (depends on the final location)
- Socio-economic impacts

POTENTIAL IMPACTS (PR CLOSURES)

- Loss of biodiversity and pre-mining land use if any residual contamination exists (considered unlikely) and if revegetation isn't successful (unknown).
- Dust (if site not appropriately rehabilitated).
- Contractor loses social and economic benefits by not continuing with the prospecting, but assumed that contractor would find contracts elsewhere.
- Resource becomes available for other potential prospectors.

NOTE: Drill sites and surrounding areas are currently used for livestock grazing, with evidence of overgrazing and compaction of soils. This would likely hamper the re-establishment of vegetation.

PUBLIC PARTICIPATION

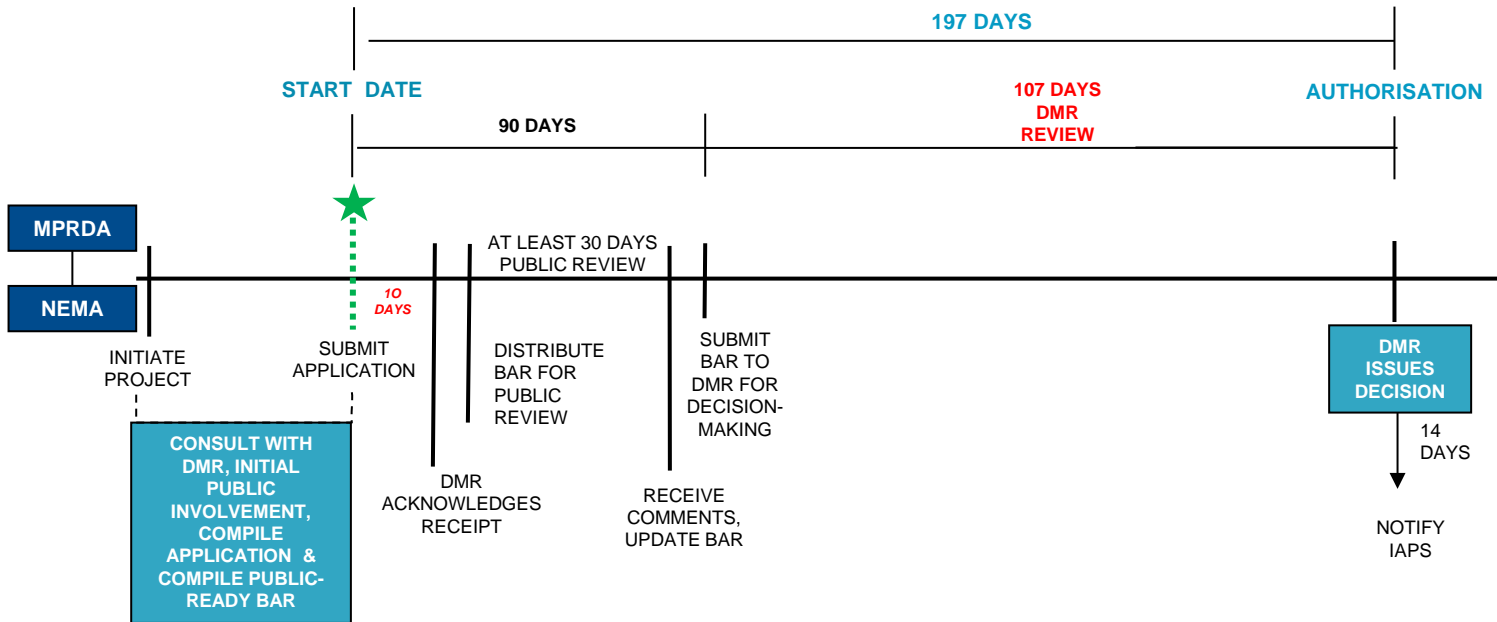
HACKNEY PR CLOSURE

- Challenges with notifying and engaging with I&APs as access to the area has been denied by the community.
- Place site notices as close as possible to the boundary of PR area and advertise in local newspaper.
- Copies of the Background Information Document (BID), BAR and related summary will be placed at the mine for public review and comment.
- Commenting authorities including both the local and district municipalities will receive copies of the BAR to review and comment.
- Any additional suggestions on how local community members can be engaged?

DRIEKOP AREA A PR CLOSURE & ADDITION OF VENT SHAFT

- Hold focussed meetings with the local chief and traditional council.
- Place site notices on the boundary of PR area and proposed location of the ventilation shaft and advertise in local newspaper.
- Distribution of BIDs by hand (during meeting with traditional council) and email. SMS notifications.
- Copies of the BIDs, BARs and related summaries will be placed at the traditional authority, at the mine and also the municipal library in Burgersfort for public review and comment.
- Regulatory authorities including both the local and district municipalities will receive copies of the BARs to review and comment.

TIMEFRAME



GENERAL DISCUSSION, COMMENTS AND QUERIES

CLOSE



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

APPLICATION FORM FOR ENVIRONMENTAL AUTHORISATIONS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND THE NATIONAL ENVIRONMENTAL MANAGEMENT WASTE ACT, 2008 IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (MPRDA) (AS AMENDED).

IMPORTANT NOTICE

Kindly note that:

1. As from 8 December 2014, this document serves as the application form, and incorporates the requisite documents that are to be submitted together with the application for the necessary environmental authorisations in terms of the said Acts.
2. This application form is applicable while the Mineral and Petroleum Resources Development Amendment Act of 2008 is in effect, as the form may require amendment should the Act be further amended.
3. Applicants are required to apply for the necessary water use licence and any other authorisations nor licences to the relevant competent authorities as required by the relevant legislation. Upon acceptance of an application for a right or permit in terms of the MPRDA, applicants will be required to provide evidence to the Regional Manager that a water use licence has been applied for.
4. The Regional Manager will respond to the application and provide the reference and correspondence details of the Competent Authority, and in the event that the application for a right or permit is accepted, together with the date by which the relevant environmental reports must be submitted. Notwithstanding anything that may appear to be stated to the contrary in the acceptance letter, the timeframes are in fact aligned and the prescribed timeframes for the submission of documents as regulated by the NEMA regulations must be strictly adhered to.
5. The application must be typed within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. Spaces are provided in tabular format and will extend automatically when each space is filled with typing.
6. The failure to submit complete information as required in this application form may result in the refusal of the application for an environmental authorisation and consequently of the right or permit applied for.
7. This application must be submitted through the SAMRAD online application system of the Department of Mineral Resources under "Other documents to upload".
8. Unless protected by law, all information filled in on this application form will become public information on receipt by the competent authority. Any interested and affected party should and shall be provided with the information contained in this application on request, during any stage of the application process.
9. Please note that an application fee is payable in terms of the National Environmental Management Act and the National Waste Management Act, which fees must be paid upon lodgement of the application. Should the said application fees not be paid as prescribed the application for a right or permit in terms of the Mineral and Petroleum Resources Development Act cannot be considered to have been made in the prescribed manner and the said application for a right or permit will have to be rejected. In this regard the type of applications must be identified in the table below.

PLEASE STATE TYPE OF AUTHORISATIONS BEING APPLIED FOR.

APPLICATION TYPE	APPLICABLE FEE	Mark with an X where applicable
NEMA S&EIR application on its own	R10 000.00	<input type="checkbox"/>
NEMA BAR application on its own	R 2 000.00	<input checked="" type="checkbox"/>
NEMWA S&EIR application on its own	R10 000.00	<input type="checkbox"/>
NEMWA BAR application on its own	R 2 000.00	<input type="checkbox"/>
NEMA S&EIR application combined with NEMWA S&EIR application	R 15 000.00	<input type="checkbox"/>
NEMA BAR application combined with NEMWA BAR application	R 3 000.00	<input type="checkbox"/>
NEMA S&EIR application combined with NEMWA BAR application	R 11 000.00	<input type="checkbox"/>

1. CONSULTATION BASIC ASSESSMENT AND/OR SCOPING REPORT

2. DETAILS OF THE APPLICANT

Project applicant:	Marula Platinum (Pty) Ltd		
Registration no (if any):	1990/004775/07		
Trading name (if any):	Marula Platinum (Pty) Ltd		
Responsible Person, (e.g. Director, CEO, etc.):	Technical Services Manager		
Contact person:	Sifiso Mthethwa		
Physical address:	Marula Platinum Mine, Steelpoort		
Postal address:	PO Box 1496, Steelpoort		
Postal code:	1133	Cell:	082 396 0292
Telephone:	013 214 6040	Fax:	013 214 6022
E-mail:	Sifiso.Mthethwa@implats.co.za		

3. ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) INFORMATION

EAP:	Caitlin Hird and Alex Pheiffer		
Professional affiliation/registration:	Member: International Association for Impact Assessment (Caitlin Hird and Alex Pheiffer) Professional Natural Scientist (Environmental Management) with the South African Council for Natural Scientific Professions (SACNASP) (Alex Pheiffer)		
Contact person (if different from EAP):	Caitlin Hird		
Company:	SLR Consulting (Africa) (Pty) Ltd.		
Physical address:	SLR House (Block 7) Fourways Manor Office Park Cnr Roos and Macbeth Street Fourways, Johannesburg, 2060		
Postal address:	PO Box 1596, Cramerview		
Postal code:	2060	Cell:	084 491 1987
Telephone:	011 467 0945	Fax:	011 467 0978
E-mail:	chird@slrconsulting.com		

If an EAP has not been appointed please ensure that an independent EAP is appointed as stipulated by the NEMA Regulations, prior to the commencement of the process.

The declaration of independence (included in Appendix 5) and the Curriculum Vitae (indicating the experience with environmental impact assessment and relevant application processes) of the EAP must also be attached as **Appendix 1**.

4. PROJECT DESCRIPTION

Farm Name:	Hackney 116 KT
Application area (Ha)	223 ha
Magisterial district:	Burgersfort Magisterial District, Sekhukhune District Municipality
Distance and direction from nearest town	The project area is located approximately 35 km north west of Burgersfort
21 digit Surveyor General Code for each farm portion	The farm Hackney 116 KT - TOKT00000000011600000
Locality map	The Regional and Local Setting are included in Appendix 2.
Description of the overall activity. (Indicate Mining Right, Mining Permit, Prospecting right, Bulk Sampling, Production Right, Exploration Right, Reconnaissance permit, Technical co-operation permit, Additional listed activity)	<p>Marula Platinum (Pty) Ltd (Marula) holds a prospecting right (prospecting right number 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite) and copper ore, and chrome ore on a portion of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area.</p> <p>Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time five approved exploration boreholes were drilled. Prospecting activities included the establishment of temporary contractor's camps and temporary access roads. For each drill site, once drilling was complete, the site was decommissioned. Decommissioning catered for the capping and sealing of boreholes, removal of any drilling equipment, chemicals and waste, treatment and filling of sumps and ripping of compacted soils (at drill sites and access tracks) to allow for re-vegetation of the site.</p> <p>Marula now wishes to close the Hackney prospecting right. It is planned by Marula that the areas disturbed by the prospecting activities are allowed to re-vegetate and be used by community members as was done prior to the prospecting activities.</p> <p>Prior to the proposed closure of the prospecting right, Marula will need to obtain an environmental authorisation from the Department of Mineral Resources (DMR). In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required. In this regard, the Environmental Impact Assessment Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended. The EIA process being undertaken will address the closure requirements of the MPRDA and NEMA.</p>

5. **ACTIVITIES TO BE AUTHORISED**

(Please provide copies of Environmental Authorisations obtained for the same property as Appendix 3). [The Hackney prospecting right \(420/2006 PR\) is included in Appendix 3.](#)
 (For an application for authorisation please indicate more than one listed activity that, together, make up one development proposal. All the listed activities pertaining to this application must be included. Please note that any authorisation that may result from this application will only cover activities specifically applied for). Attach a proposed site plan, drawn to a scale acceptable to the competent Authority, showing the location of all the activities to be applied for in **Appendix 4**)

NAME OF ACTIVITY (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining - excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	Aerial extent of the Activity Ha or m²	LISTED ACTIVITY (Mark with an X where applicable or affected).	APPLICABLE LISTING NOTICE (GNR 983, GNR 984 or GNR 985)	WASTE MANAGEMENT AUTHORISATION (Indicate whether an authorisation is required in terms of the Waste Management Act). (Mark with an X)
Closure of already decommissioned prospecting activities (which include drill sites, contractor's office/camp sites/storage areas, access tracks). It should be noted that no drilling or related activities have taken place since 2012.	Prospecting right area requiring closure: 223 ha Approximately 0.12 ha (1200m ²)*	X	NEMA: GNR 983 (Activity 22): The decommissioning of any activity requiring - i. A closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) <i>This activity is triggered since the closure of the prospecting right requires a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)</i>	Not applicable

* Note: The last drill site was completed in 2012. This value represents the anticipated total area requiring monitoring, aftercare and maintenance. This is an estimate included for the purposes of this application however it will be verified through the EMP Performance Assessment and Financial Provision estimate that are being developed for the project. This figure is subject to being updated.

6. PUBLIC PARTICIPATION

(Provide details of the public participation process proposed for the application as required by Regulation.

Details of the Public Participation process to be followed.

6.1.1. IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES TO BE CONSULTED

IDENTIFICATION CRITERIA	Mark with an X where applicable	
	YES	NO
Will the landowner be specifically consulted?	X	
Will the lawful occupier on the property other than the Landowner be consulted?	X	
Will a tribal authority or host community that may be affected be consulted?	X	
Will recipients of land claims in respect of the area be consulted?	X	
Will the landowners or lawful occupiers of neighbouring properties be identified?	X	
Will the local municipality be consulted?	X	
Will the Authority responsible for power lines within 100 metres of the area be consulted?	X	
Will Authorities responsible for public roads or railway lines within 100 metres of the area applied for be consulted?	X	
Will authorities responsible for any other infrastructure within 100 metres of the area applied for be consulted? (Specify)		X
Will the Provincial Department responsible for the environment be consulted?	X	
Will all of the parties identified above be provided with a description of the proposed mining /prospecting operation as referred above?	X	
Will all the parties identified above be requested in writing to provide information as to how their interests (whether it be socio-economic, cultural, heritage or environmental) will be affected by the proposed mining project?	X	
Other, Specify	Not applicable	

6.1.2. DETAILS OF THE ENGAGEMENT PROCESS TO BE FOLLOWED

<p>Steps to be taken to notify interested and affected parties(Describe the process to be undertaken to consult interested and affected parties including public meetings and one on one consultations. NB the affected parties must be specifically consulted regardless of whether or not they attended public meetings. Photographs of notice boards, and copies of advertisements and notices notifying potentially interested and affected parties of the proposed application must be attached as Appendix 7)</p>	<p>PROVIDE DESCRIPTION HERE</p> <p>The proposed public consultation process is in accordance with the requirements of Chapter 6 of the Environmental Impact Assessment Regulations (GNR 982 of 2017) 2014, as amended, and is outlined in Table 1 below.</p> <p>The aim of the public consultation process is to co-ordinate a process through which interested and affected parties (I&APs) are informed of the proposed project and environmental assessment process and are provided with an opportunity to provide input into the closure application process.</p> <p>Table 1: Proposed Public Participation Process</p> <table border="1"> <thead> <tr> <th>Task</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td colspan="2">Pre-application and application phase</td> </tr> <tr> <td>DMR pre-application meeting</td> <td>A pre-application meeting was held with the DMR in Polokwane on 10 April 2019. The purpose of this meeting was: <ul style="list-style-type: none"> To provide information pertaining to the project To outline the motivation for the proposed closure To provide an overview of the environmental process relevant to the project To provide an overview of the existing status of the environment To outline and obtain input on the potential environmental/cultural impacts To outline and obtain input on the planned public participation process. <p>A copy of the pre-application meeting minutes is included in Appendix 6.</p> </td> </tr> <tr> <td>Notification of the land claims</td> <td>The land claims commissioner was consulted in order to verify if any land claims have been lodged on the farm Hackney 116KT. The proof of</td> </tr> </tbody> </table>	Task	Description	Pre-application and application phase		DMR pre-application meeting	A pre-application meeting was held with the DMR in Polokwane on 10 April 2019. The purpose of this meeting was: <ul style="list-style-type: none"> To provide information pertaining to the project To outline the motivation for the proposed closure To provide an overview of the environmental process relevant to the project To provide an overview of the existing status of the environment To outline and obtain input on the potential environmental/cultural impacts To outline and obtain input on the planned public participation process. <p>A copy of the pre-application meeting minutes is included in Appendix 6.</p>	Notification of the land claims	The land claims commissioner was consulted in order to verify if any land claims have been lodged on the farm Hackney 116KT. The proof of
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	commissioner	correspondence is attached in Appendix 6.
	Environmental authorisation application submission	Submission of this NEMA environmental authorisation application to the DMR.
	Notification of commenting authorities and I&APs	
	Background Information Document (BID)	<p>A BID (in English and Sepedi) was compiled by SLR. The BID provides:</p> <ul style="list-style-type: none"> • Information about the proposed prospecting right closure • Information about the baseline environment of the prospecting right area • Information about the environmental assessment process (Basic Assessment Process) • Information regarding possible environmental/cultural impacts • Information on how I&APs and commenting authorities can have input into the environmental assessment process. <p>The BID was distributed to commenting authorities registered on the project database via email and was made available (at the mine) to I&APs on 17 April 2019. A registration and response form was attached to the BID, which provided I&APs with an opportunity to register as an I&AP and submit comments on the proposed project. Copies of the BID in English and Sepedi are included in Appendix 6.</p>
	Site notices	Laminated site notices (in English and Sepedi) were placed in the prospecting right area on 16 April 2019. Photographic proof is included in Appendix 6. A map illustrating the location of the site notices is also included.
	Newspaper advertisements	A block advertisement was placed in the Steelburger newspaper on 19 April 2019. A copy of the advert is included in Appendix 6.
	Review of the Basic Assessment Report	
	Public review and commenting authority Review of Basic Assessment Report	<p>The Basic Assessment Report will be made available for public review and comment for 30 days. Summaries of the Basic Assessment Report (in English and Sepedi) will be made available to all I&APs registered on the I&AP database. I&APs will be notified when the Basic Assessment Report will be available for review via SMS. In addition to this, an electronic copy will be made available on the SLR website.</p> <p>Commenting authorities will either receive an electronic copy or a hard copy of the Basic Assessment Report depending on the commenting authorities' preference.</p>
	Following review of the Basic Assessment Report	The Basic Assessment Report will be updated to include all comments received during the public review and commenting period. Comments will be recorded and responded to in a Comments and Response Report. This updated report will be submitted to the DMR for decision making purposes.
Information to be provided to Interested and Affected Parties.	<p>Compulsory</p> <ul style="list-style-type: none"> • The site plan • List of activities to be authorised • Scale and extent of activities to be authorised • Typical impacts of activities to be authorised (e.g. surface disturbance, dust, noise, drainage, fly rock etc.) • The duration of the activity. • Sufficient detail of the intended operation to enable them to assess what impact the activities will have on them or on the use of their land) <p>Other, specify: Not applicable</p>	
Information to be required from Interested and Affected Parties.	<p>Compulsory</p> <ul style="list-style-type: none"> • To provide information on how they consider that the proposed activities will impact on them or their socio-economic conditions • To provide written responses stating their suggestions to mitigate the anticipated impacts of 	

	<p>each activity</p> <ul style="list-style-type: none"> To provide information on current land uses and their location within the area under consideration To provide information on the location of environmental features on site to make proposals as to how and to what standard the impacts on site can be remedied. requested to make written proposals To mitigate the potential impacts on their socio economic conditions to make proposals as to how the potential impacts on their infrastructure can be managed, avoided or remedied).
	Other, Specify: Not applicable

7. Description of the assessment process to be undertaken

ITEM	DESCRIPTION																			
<p>Environmental attributes. Describe how the Environmental attributes associated with the development footprint will be determined.</p>	<p>Environmental attributes associated with the prospecting right closure area have been determined through an audit of available information (including existing prospecting reports, approved EIA/EMPs etc.). In addition, a site visit of the broader area was undertaken to verify baseline conditions.</p> <p>The potential environmental attributes have been outlined in the BID that has been distributed to I&APs and commenting authorities. Input on the environmental attributes will continue to be obtained from I&APs and commenting authorities during the environmental assessment process.</p>																			
<p>Identification of impacts and risks. (Describe the process that will be used to identify impacts and risks.</p>	<p>Impacts and risks will be identified with input from the Marula project team, review of available reports and data and input from I&APs and commenting authorities during the environmental assessment process. In addition, a site visit of the broader area was undertaken to understand and identify risks and impacts.</p>																			
<p>Consideration of alternatives. Describe how alternatives, and in particular the alternatives to the proposed site layout and possible alternative methods or technology to be applied will be determined.</p>	<p>Since Marula has been denied access to the prospecting right area, a Board decision was taken to discontinue (abandon) prospecting activities and exit from the Hackney project. Marula has informed the community of this. Abandoning of the prospecting right allows for new third party application to be lodged with the DMR.</p>																			
<p>Process to assess and rank impacts. Describe the process to be undertaken to identify, assess and rank the impacts and risks each individual activity.</p>	<p>The proposed method for the assessment of issues is set out in the table below. This assessment methodology enables the assessment of issues including: cumulative impacts, the severity of impacts (including the nature of impacts and the degree to which impacts may cause irreplaceable loss of resources), the extent of the impacts, the duration and reversibility of impacts, the probability of the impact occurring, and the degree to which the impacts can be mitigated.</p> <p>Each potential impact will be assessed using the following criteria: <i>Note: Part A provides the definition for determining impact consequence (combining severity, spatial scale and duration) and impact significance (the overall rating of the impact). Impact consequence and significance are determined from Part B and C. The interpretation of the impact significance is given in Part D.</i></p> <table border="1"> <thead> <tr> <th colspan="2">PART A: DEFINITION AND CRITERIA*</th> </tr> <tr> <th>Definition of SIGNIFICANCE</th> <th>Significance = consequence x probability</th> </tr> <tr> <th>Definition of CONSEQUENCE</th> <th>Consequence is a function of severity, spatial extent and duration</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Criteria for ranking of the SEVERITY of environmental impacts</td> <td>H</td> <td>Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.</td> </tr> <tr> <td>M</td> <td>Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.</td> </tr> <tr> <td>L</td> <td>Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.</td> </tr> <tr> <td>L+</td> <td>Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.</td> </tr> <tr> <td>M+</td> <td>Moderate improvement. Will be within or better than the recommended level. No observed reaction.</td> </tr> <tr> <td>H+</td> <td>Substantial improvement. Will be within or better than the recommended level. Favourable publicity.</td> </tr> </tbody> </table>	PART A: DEFINITION AND CRITERIA*		Definition of SIGNIFICANCE	Significance = consequence x probability	Definition of CONSEQUENCE	Consequence is a function of severity, spatial extent and duration	Criteria for ranking of the SEVERITY of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.	H+	Substantial improvement. Will be within or better than the recommended level. Favourable publicity.
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	Criteria for ranking the DURATION of impacts		L	Quickly reversible. Less than the project life. Short term		
			M	Reversible over time. Life of the project. Medium term		
			H	Permanent. Beyond closure. Long term.		
	Criteria for ranking the SPATIAL SCALE of impacts		L	Localised - Within the site boundary.		
			M	Fairly widespread – Beyond the site boundary. Local		
			H	Widespread – Far beyond site boundary. Regional/ national		
	PART B: DETERMINING CONSEQUENCE					
	SEVERITY = L					
	DURATION	Long term	H	Medium	Medium	Medium
		Medium term	M	Low	Low	Medium
		Short term	L	Low	Low	Medium
	SEVERITY = M					
	DURATION	Long term	H	Medium	High	High
		Medium term	M	Medium	Medium	High
		Short term	L	Low	Medium	Medium
SEVERITY = H						
DURATION	Long term	H	High	High	High	
	Medium term	M	Medium	Medium	High	
	Short term	L	Medium	Medium	High	
			L	M	H	
			Localised Within site boundary Site	Fairly widespread Beyond site boundary Local	Widespread Far beyond site boundary Regional/ national	
SPATIAL SCALE						
PART C: DETERMINING SIGNIFICANCE						
PROBABILITY (of exposure to impacts)	Definite/ Continuous	H	Medium	Medium	High	
	Possible/ frequent	M	Medium	Medium	High	
	Unlikely/ seldom	L	Low	Low	Medium	
			L	M	H	
CONSEQUENCE						
PART D: INTERPRETATION OF SIGNIFICANCE						
Significance		Decision guideline				
High		It would influence the decision regardless of any possible mitigation.				
Medium		It should have an influence on the decision unless it is mitigated.				
Low		It will not have an influence on the decision.				
*H = high, M= medium and L= low and + denotes a positive impact.						
Contribution of specialist reports Describe how specialist reports, if required, will be taken into consideration and inform the impact identification, assessment and remediation process.	Given that the project relates to the closure of an existing prospecting right where drilling has not taken place since 2012 due to access to the area being refused by the community, no project specific specialist investigations are planned or deemed necessary.					
Determination of impact management objectives and outcomes. Describe how impact management objectives will be determined for each activity to address the potential impact at source, and how the impact management outcomes will be aligned with standards.	The project team will determine the impact management objectives with consideration to relevant Standards and guidelines.					

8. OTHER AUTHORISATIONS REQUIRED

LEGISLATION	Mark with an X where applicable			
	AUTHORISATION REQUIRED		APPLICATION SUBMITTED	
	YES	NO	YES	NO
SEMA s				
National Environmental Management: Air Quality Act		X		
National Environmental Management: Biodiversity Act		X		
National Environmental Management: Integrated Coastal Management Act		X		
National Environmental Management: Protected Areas Act		X		
National Environmental Management: Waste Act		X		
National legislation				
Mineral Petroleum Development Resources Act	X			X
National Water Act		X		
National Heritage Resources Act		X		
Others: Please specify Mine Health and Safety Act, Explosives Act, National Roads Act, National Railway Safety Regulator Act.		X		

Note: The MPRDA Closure Application will be submitted to the DMR once all supporting reports including the BAR have been completed. This will form part of the final BAR.

Please provide proof of submission of applications in **Appendix 6**. Not applicable.

In the event that an authorisation in terms of the National Environmental Waste Management Act is required for any of the activities applied for please state so clearly in order for such an authorisation to be considered as part of this application.

9. DRAFT EMPr

For consultation purposes, provide a high level approach to the management of the potential environmental impacts of each of the activities applied for.

A high level approach to the management of potential environmental/cultural impacts is provided in the table below. It is important to note that management measures provided in the table below will be refined during the Basic Assessment Process.

ACTIVITIES (E.g. For prospecting - drill site, site camp, ablution facility, accommodation, equipment storage, sample storage, site office, access route etc...etc...etc E.g. for mining - excavations, blasting, stockpiles, discard dumps or dams, Loading, hauling and transport, Water supply dams and boreholes, accommodation, offices, ablution, stores, workshops, processing plant, storm water control, berms, roads, pipelines, power lines, conveyors, etc...etc...etc.)	PHASE (of operation in which activity will take place). State; Planning and design, Pre-Construction Construction, Operational, Rehabilitation, Closure, Post closure.	SIZE AND SCALE (of Disturbance) (volumes, tonnages and hectares or m ²)	TYPICAL MMITIGATION MEASURES (Eg, storm water control, dust control, noise control, access control, rehabilitation etc....., etc.....)*	COMPLIANCE WITH STANDARDS (A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities)
Closure of already decommissioned prospecting activities (which include drill sites, contractor's office/camp sites/storage areas, access tracks). It should be noted that no drilling or related activities have taken place since 2012.	Closure	Prospecting right area requiring closure: 223 ha Approximately 0.12 ha (1200m ²)*	<ul style="list-style-type: none"> • Maintenance, monitoring and aftercare 	N/A

* Note: The last drill site was completed in 2012. This value represents the anticipated total area requiring monitoring, aftercare and maintenance. This is an estimate included for the purposes of this application however it will be verified through the EMP Performance Assessment and Financial Provision estimate that are being developed for the project. This figure is subject to being updated.

10. CLOSURE PLAN

In the space provided under each heading below, please provide a high level description of the plan for closure and the information that will be provided in the draft EMPr accompanying draft basic assessment report or environmental impact reports going forward.	
Baseline environment Describe how the baseline environment will be determined with the input of interested and affected parties and due cognizance of the current land uses and or existing biophysical environment	The baseline environment will be characterised using information obtained from a site visit of the broader area and the review of existing prospecting reports. I&APs had an opportunity to provide input on the baseline environment through the review and comment on the BID. I&APs will have a further opportunity to provide input on the baseline environment through the review of the Basic Assessment Report.
Closure objectives Describe the closure objectives and the extent to which they will be aligned to the baseline environment	The closure objective is to return the land to its pre-disturbance potential.
Rehabilitation Plan Describe the scale and aerial extent of the prospecting or mining listed activities to be authorised, including the anticipated prospecting or mining area at the time of closure, and confirm that a site rehabilitation plan drawn to a suitable scale will be provided in the draft EMPr to be submitted together with the draft EIR or Basic Assessment Report as the case may be.	Rehabilitation of each borehole began as each drill site was decommissioned. The last drill site was completed in 2012. The anticipated total area requiring monitoring, aftercare and maintenance is estimated to be 0.12 ha. The rehabilitation plan for the project will be included in the Basic Assessment Report.
Rehabilitation Cost Describe how the rehabilitation cost will be determined and provide a preliminary estimate thereof	The rehabilitation cost will be determined and included in the Basic Assessment Report.
Decommissioning Considering that rehabilitation must take place upon cessation of an activity, describe when each of activities applied for will be rehabilitated in terms of either the cessation of the individual activity or the cessation of the overall prospecting or mining activity.	Given the nature of prospecting activities, decommissioning of each drill site and associated facilities takes place on completion of the drilling activities. Rehabilitation follows the decommissioning activities.

Signature of the applicant / Signature on behalf of the applicant:

Marula Platinum (Pty) Ltd

Name of company (if applicable):

Date:

30/04/2019

APPENDIX 1: CURRICULA VITAE AND EAP REGISTRATION

- Alex Pheiffer – CV and SACNASP registration
- Caitlin Hird - CV

APPENDIX 2: REGIONAL MAP (FIGURE 1) AND LOCALITY MAP (FIGURE 2)

APPENDIX 3: ENVIRONMENTAL AUTHORISATIONS

- [Prospecting Right](#)

**APPENDIX 4: SITE PLAN: PROSPECTING RIGHT BOUNDARY AND LOCATION OF BOREHOLES
(FIGURE 3)**

APPENDIX 5: DECLARATION OF THE EAP UNDER OATH

I, Caitlin Hird, 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;
- I 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;



 Signature of the environmental assessment practitioner:

SLR Consulting (Africa) (Pty) Ltd

Name of company:

30/04/2019

Date:

APPENDIX 6: PROOF OF PUBLIC CONSULTATION

- Meeting minutes of pre-application meeting held with the DMR on 10 April 2019
- Site notices, photos of site notices and map illustrating the location of the site notices placed on 16 April 2019
- Copies of advertisement placed in the Steelburger newspaper
- BID in English and Sepedi and proof of distribution
- SMS notification to stakeholders registered on the project database

Date: 02/05/2019 Time: 12:07:21 PM

Profile name:	SLR CONSULTING (AFRICA) (PTY) LTD
Batch reference number:	773746881
Payment reference number:	000000002149740965
Payment date:	02/05/2019
Payment capture date:	02/05/2019
Payment authorise date and time:	02/05/2019 11:46:59 AM
From account name:	SLR CONSULTING (SOUTH AFRICA)
From account description:	SLR Consulting SA
From account statement description:	Department of Mineral Resource
Beneficiary account number:	4059160603
Beneficiary/ Recipient name:	Department of Mineral Resources Pietersburg Limpop
Beneficiary statement description:	LPNEMA420/2006PR
Branch code:	632005
Amount:	2,000.00
Real-time:	No

Additional comments by payer:

View your account to confirm that you have received this payment.

- All payments are subject to clearing rules.

Please refer to landing page for cut off times and telephone numbers.



STAMP/SIGN FOR SLR RECORDS

**MARULA PLATINUM (PTY) LTD
CLOSURE OF THE HACKNEY 116 KT PROSPECTING RIGHT**

**NEMA APPLICATION IN SUPPORT OF LISTED ACTIVITIES (IN LISTING NOTICE 1)
UNDER THE EIA REGULATIONS, 2014 (AS AMENDED) REQUIRING A BASIC
ASSESSMENT PROCESS IN TERMS OF THE NATIONAL ENVIRONMENTAL
MANAGEMENT ACT (NO. 107 OF 1998) (NEMA)**

This is to certify that I

Mr Kolani Thivulawi

in my capacity as a representative of

Department of Mineral Resources

have received the following document:

PLEASE COMPLETE AND TICK RELEVANT BOX

1x Hard copy of the NEMA Application	
1x Electronic copy (CD) of the NEMA Application	

Date:.....

Signature/ Stamp:

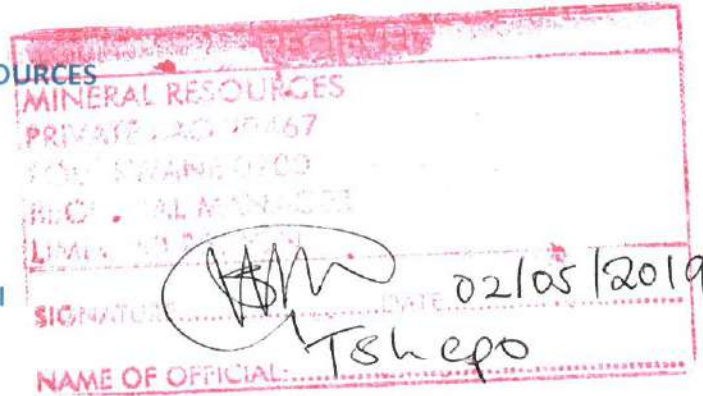
RECEIVED
MINERAL RESOURCES
PRIVATE BAG 89467
PORT KOWARIE 6700
RECEIVED
LIAISON OFFICER
SIGNATURE: [Signature] DATE: 02/05/2014
NAME OF OFFICIAL: T Shepo

Project Reference: 710.09002.00016

2 May 2019

DEPARTMENT OF MINERAL RESOURCES
101 DORP STREET
POLOKWANE
0699

ATTENTION: KOLANI THIVULAWI



MARULA PLATINUM (PTY) LTD

CLOSURE OF HACKNEY 116KT PROSPECTING RIGHT (420/2006PR)

NEMA APPLICATION IN SUPPORT OF LISTED ACTIVITIES UNDER LISTING NOTICE 1 OF THE EIA REGULATIONS, 2014 (AS AMENDED) REQUIRING A BASIC ASSESSMENT PROCESS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO. 107 OF 1998) (NEMA)

Dear Kolani

Marula Platinum (Pty) Ltd (Marula) holds a prospecting right (prospecting right number 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite) and copper ore, and chrome ore on a portion of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area.

Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time five approved exploration boreholes were drilled. Prospecting activities included the establishment of temporary contractor's camps and temporary access roads. For each drill site, once drilling was complete, the site was decommissioned. Decommissioning catered for the capping and sealing of boreholes, removal of any drilling equipment, chemicals and waste, treatment and filling of sumps and ripping of compacted soils (at drill sites and access tracks) to allow for re-vegetation of the site.

Since 2012, Marula has been denied access to the prospecting right area by the Djate and Modimolle Communities residing on the farm Hackney 116 KT, and consequently Marula now plans to close the Hackney prospecting right.

Prior to the proposed closure of the prospecting right, Marula will need to obtain an environmental authorisation from the Department of Mineral Resources (DMR). In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the EIA Regulations, 2014 (as

amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required. In this regard, the Environmental Impact Assessment Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

The EIA process being undertaken will address the closure requirements of the MPRDA and NEMA, and the key deliverable to the DMR by end June 2019 will a Final BAR (which has been subject to a public review period) inclusive of:

- A closure plan
- A risk assessment
- A financial provision update
- An final EMP performance assessment
- A closure form P
- A public participation process

In support of the above, please find enclosed 1 hard copy and 1 electronic copy (CD) of Marula's NEMA Application. In addition please find enclosed proof of payment of the R2000 NEMA Application fee.

Should you have any queries kindly contact the undersigned.

Kind regards



Caitlin Hird

(011) 467 0945 (Tel)

(011) 467 0978 (Fax)

chird@slrconsulting.com



DEPARTMENT: MINERALS AND ENERGY
REPUBLIC OF SOUTH AFRICA

APPLICATION FOR CLOSURE CERTIFICATE

[in terms of section 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 Limpopo

1 Number of permission, permit or right

DMR REF: 420/2006PR

2 Name of applicant

Marula Platinum (Pty) Ltd

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

- Reconnaissance permission [] Reconnaissance permit []
Prospecting right [X] Exploration right []
Mining right [] Production right []
Mining permit []

4 Type of mineral or minerals

Platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite), copper ore & chrome ore

5 Over the following land or area of offshore licence block

Portion of the farm Hackney 116 KT

(attached a plan of land, area or offshore licence blocks applied for, if necessary)
Minerals and Energy for Development and Prosperity

6 Reason for application

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

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

Portion of the farm Hackney 118 KT, located 35 km north-west of Burgersfort in the Limpopo Province
(21 digit SG code for Hackney: TOKT0000000011600000)
Total area covered by the prospecting right: 223 ha
See Figures 1 - 5 included in Basic Assessment Report (BAR) (for further details including co-ordinates)

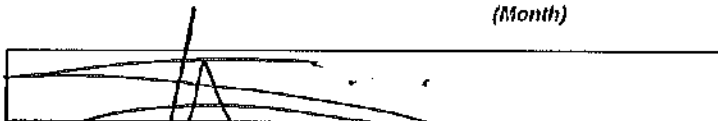
8 Application for the transfer of environmental liabilities and responsibilities. If relevant, a separate submission must be appended to the application.

9 The following documents must accompany the application:

- A. A closure plan contemplated in regulation 62. Refer to Part A (Section 4) and Part B of the BAR
- B. A final performance assessment on the environmental management programme or environmental management plan, as the case may be. Refer to Section 8 of the BAR
- C. An application form in the form of Form O contained in Annexure II, to transfer environmental liabilities and responsibilities to a competent person, if applicable. **Not applicable**
- D. A copy of an environmental risk report contemplated in regulation 60. Refer to Section 8 and Appendix D of the BAR

Signed at BURGERSFORT
(Place)

on the 13 day of MAY
(Month) 2019
(Year)


SIGNATURE OF APPLICANT



COMMISSION ON RESTITUTION OF
LAND RIGHTS

OFFICE OF THE REGIONAL LAND CLAIMS COMMISSIONER: LIMPOPO
61 Biocard Street/96 Kagiso House Cnr. Rissik and Schoeman, Polokwane, 0700
Private Bag X9552, Polokwane, 0700
Tel: (015) 284 6300/287 2600 Fax No: (015) 295 7404/7403

Enq: Ratshisusu TU
Our Ref: 12/R – KRP 1447

SLR CONSULTING (AFRICA) (PTY) LTD
UNIT 7, FOURWAYS MANOR OFFICE PARK
1 MACBETH AVENUE FOURWAYS
JOHANNESBURG, 2191
EMAIL: gdhlamini@slrconsulting.com

Attention: Mr / Ms Gugu Dhlamini

Dear Sir / Madam

**ENQUIRIES REGARDING LAND CLAIMS IN TERMS OF THE RESTITUTION OF
LAND RIGHTS ACT, 1994 (ACT NO. 22 OF 1994)**

1. Your enquiry dated the 27 March 2019 has reference and is acknowledged.
2. Kindly take note that there is a restitution land claims lodged prior 1998 on the property appearing on your email. The land claim is as follows:

Property/Farm Name	Claimant(s)	KRP	Claim Status
Hackney 116 KT	The Roka Mashabela Tribe	1447	Research Report Approved

The Project Manager is Mrs Makhanana Senwana and she can be contacted at
(015) 284 6300 or makhanana.senwana@drdlr.gov.za

Yours Faithfully,

MR. S S MABEBA
DIRECTOR QUALITY ASSURANCE AND ADMINISTRATION
DATE: 02/04/2019



OFFICE OF THE REGIONAL LAND CLAIMS COMMISSIONER: LIMPOPO
61 Biccard Street/96 Kagiso House Cnr. Rissik and Schoeman, Polokwane, 0700
Private Bag X9552, Polokwane, 0700
Tel: (015) 284 6300/287 2600 Fax No: (015) 295 7404/7403

Enq: Ratshisusu TU
Our Ref: 12/R – KRP 764

SLR CONSULTING (AFRICA) (PTY) LTD
UNIT 7, FOURWAYS MANOR OFFICE PARK
1 MACBETH AVENUE FOURWAYS
JOHANNESBURG, 2191
EMAIL: gdhlamini@slrconsulting.com

Attention: Mr / Ms Gugu Dhlamini

Dear Sir / Madam

ENQUIRIES REGARDING LAND CLAIMS IN TERMS OF THE RESTITUTION OF LAND RIGHTS ACT, 1994 (ACT NO. 22 OF 1994)

- Your enquiry dated the 29 March 2019 has reference and is acknowledged.
- Kindly take note that there are restitution land claims lodged prior 1998 on the property appearing on your email. The land claims are as follows:

Property/Farm Name	Claimant(s)	KRP	Claim Status
Driekop 253 KT	Babina Kgomo ba Mohlala tribe	764	Research Report Approved
	Batau ba Matji community	11056	
	Driekop B Community	2546	
	Stander RHL	2395	

The Project Manager is Mrs Makhanana Senwana and she can be contacted at (015) 284 6300 or makhanana.senwana@drdlr.gov.za

Yours Faithfully,

Mr. S S MABEBA
DIRECTOR QUALITY ASSURANCE AND ADMINISTRATION
DATE: 02/04/2019



OFFICE OF THE REGIONAL LAND CLAIMS COMMISSIONER: LIMPOPO
61 Biccard Street/96 Kagiso House Cnr. Rissik and Schoeman, Polokwane, 0700
Private Bag X9552, Polokwane, 0700
Tel: (015) 284 6300/287 2600 Fax No: (015) 295 7404/7403

Enq: Ratshisusu TU
Our Ref: 12/R-R/5/121/465/144308

**SLR CONSULTING (AFRICA) (PTY) LTD
UNIT 7, FOURWAYS MANOR OFFICE PARK
1 MACBETH AVENUE FOURWAYS
JOHANNESBURG, 2191
EMAIL: gdhlamini@slrconsulting.com**

Attention: Mr / Ms Gugu Dhlamini

Dear Mr / Ms Sir / Madam

LAND CLAIMS ENQUIRY – DRIEKOP 253 KT

We refer to your email dated 29 March 2019.

We confirm that there is an existing land claim against the Property. The claim was lodged by Marota Madibong Community with ref: R/5/121/465/144308 on 19-04-2016.

The claim was lodged in terms of the Restitution of Land Rights Amendment Act, 2014 (Act No 15 of 2014) ("the Amendment Act") which, amongst others, reopened the lodgement of claims for a period of five years.

The validity of the Amendment Act was challenged in the Constitutional Court. The Constitutional Court found the Amendment Act to be invalid because of the failure of Parliament to facilitate public involvement as required by the Constitution. The Amendment Act ceased to be law on 28 July 2016.

The Constitutional Court ordered that the claims that were lodged between 1 July 2014 and 27 July 2016 are validly lodged, but it interdicted the Commission from processing those claims until the Commission has finalised the claims lodged by 31 December 1998 or until Parliament passes a new law providing for the re-opening of lodgement of land claims.

The Commission will therefore not be processing the above claim until it finishes claims lodged by 31 December 1998 or until Parliament passes a new law providing for re-opening of lodgement of claims.

It is important to note that the provisions of section 11 (7) of the Restitution of Land Rights Act, 1994 do not apply until after the Commission has accepted the claim for investigation and published its details in the Government Gazette. That will only be done on the happening of either event in the previous paragraph.

Yours faithfully



Mr. S S MABEBA
DIRECTOR QUALITY ASSURANCE AND ADMINISTRATION
DATE: 02/04/2019

NOTICES

REACH YOUR TARGETS

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Notice of Environmental Authorisation Application and Call for Comments

In terms of provisions of the National Environmental Management Act (Act No. 107 of 1998) please be advised that an application for demarcation of 300 sites at Magaragareng Village and 250 sites at Dresden Village have been lodged by MPC Technology (Pty) Ltd at the Limpopo Department of Economic Development Environment and Tourism.

Note further that copies of the EIA reports of the proposed projects are available for public scrutiny.

The reports can be requested at the following:

Email: nemdacompany@gmail.com

Office: 49 Limdev building 2nd floor, Thohoyandou

Traditional Council: Magaragareng - Tau-Phahlamohaka Traditional Council under Chief K.P. Phahlamohaka
Dresden – Majaditshukudu Tradition Council under Chief H.J. Mohlala

Environmental Impact Practitioners

M. Muvhulawa and M.Q. Mudzanani

Tel/Fax: 015-962-1639

Email: nemdacompany@gmail.com

Should you wish to raise concern, seek clarity or require further information or register as an interested or affected party, kindly contact the individuals mentioned above within 30 days of publication of this notice.



THABA CHWEU LOCAL MUNICIPALITY

PUBLIC NOTICE

NOTICE OF A SUPPLEMENTARY VALUATION TO THE GENERAL VALUATION ROLL FOR THE PERIOD 2014 TO 2019

Notice is hereby given in terms of section 78(5)(a) read together with Section 78(5)(b) of the Local Government: Municipal Property Rated Act, Act No. 6 of 2004, as amended hereinafter referred to as the "Act", that a supplementary Valuation to the General Valuation Roll has been completed.

An invitation is hereby made in terms of Section 78(5)(b) of the Act that any owner of the property who so desires may request a review with the Municipal Manager in respect of any matter reflected in the supplementary valuation within the period of 30 days of the date here-of.

***NB:** Attention is drawn to the fact that in terms of section 50(2) of the Act, an objection must be in relation to a specific individual property and not against the supplementary valuation roll as a whole.

The forms for lodging of an objection are obtainable from the office listed below, and a fee of R7.00 is payable for each objection form.

The completed form must be returned to the addresses listed below on or before 31 May 2019.

No copy of objections received by fax or e-mail will be accepted.

No objection pertaining to the General Valuation Roll will be accepted.

Ms S S Matsi
Acting Municipal Manager
Thaba Chweu Local Municipality

LYDENBURG OFFICE
Cnr. Viljoen & Sentraal Streets
Enquiries: Ms D Chauke
Tel: 013-235-7350
Enquiries: D Dolamo
Tel: 013-235-7348

Notice 49/2019



FETAKGOMO TUBATSE LOCAL MUNICIPALITY

FETAKGOMO TUBATSE LOCAL MUNICIPALITY PUBLIC NOTICE: ADOPTION OF THE ADJUSTMENT SDBIP 2018/19

Resultant to the provisions of Local Government Municipal System Act 2000 (no 32 of 2000 as amended) read consistently with the Municipal Finance Management Act, 2003 (no 56 of 2003) section 54(3) and 54(1) (C) subsidiary legislations and performance prescripts, the Fetakgomo Tubatse Local Municipality approved 2018/19 adjustment Service Delivery and Budget Implementation Plan herein referred to as the SDBIP in terms of the Council Resolution number SC51/2019 revised SDBIP may be viewed and accessed at the places stated in the table below:

Node	Specific place
Apel Regional Office	Ga - Nkoana
Burgersfort	Burgersfort Town
Praktiseer	Praktiseer Satellite Office
Ohrigstad	Ohrigstad Satellite Office
Atok	Atok Thusong Service Centre
Mapodile satellite Office	Ga - Mapodile
Municipal website	www.ftlm.gov.za

Be kindly advised to direct any queries and/or matter of clarificatory purposes to the PMS Manager MJ Tshilwane at the Municipal Offices tel 013-231-1186 / 072-170-1112 & email: mjtshilwane@tubatse.gov.za who shall offer reasonable assistance in the above respects.

Issued by the office of the Mayor

"Let's grow South Africa together"

CLLR PHALA TN
THE MAYOR

APPLICATION FOR CLOSURE OF THE MARULA PLATINUM (PTY) LTD HACKNEY 116 KT PROSPECTING RIGHT

PUBLIC PARTICIPATION PROCESS: INVITATION TO REGISTER AND COMMENT

Marula Platinum (Pty) Ltd (Marula) operates a platinum mine approximately 35 km north-west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province. Marula holds a prospecting right (prospecting right number 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite), copper ore, and chrome ore on the southern section of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area.

Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time approved exploration boreholes were drilled. Marula is now planning to close the Hackney prospecting right.

Prior to the proposed closure of the prospecting right, Marula will need to obtain an environmental authorisation from the Department of Mineral Resources (DMR). In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Marula to manage the environmental assessment process. The public participation process is being undertaken in terms of the NEMA: EIA Regulations (GNR 982, 4 December 2014), as amended.

To ensure that you are identified as an interested and/or affected party (I&AP) or to receive more detailed information on the project please submit your name, contact information and interest in the matter in writing to the contact person(s) given below by 3 May 2019. Any I&APs registered on the project database will be notified when the Draft Basic Assessment Report (BAR) will be available for review and will be given the opportunity to review and submit comments on the BAR and/or summary document. The BAR and summary document will be made available in May 2019. Where responses or comments are received by 3 May 2019 these will be included in the Draft Basic Assessment Report (BAR) for public review, however I&APs will have the opportunity to submit comments until the end of the BAR review period.

Caitlin Hird or Clive Phashe
Email: chird@slrconsulting.com or cphashe@slrconsulting.com
Tel: 011-467-0945
Fax: 011-467-0978
Post: PO Box 1596, Cramerview, 2060
Note: If using post, please also contact us telephonically to notify us of your submission.

PUBLIC PARTICIPATION PROCESS: INVITATION TO REGISTER AND COMMENT

Marula Platinum (Pty) Ltd (Marula) operates a platinum mine approximately 35 km north west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province. Marula holds a prospecting right (prospecting right number 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite), copper ore and chrome ore on the southern section of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area.

Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time approved exploration boreholes were drilled. Marula is now planning to close the Hackney prospecting right.

Prior to the proposed closure of the prospecting right, Marula will need to obtain an environmental authorisation from the Department of Mineral Resources (DMR). In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Marula to manage the environmental assessment process. The public participation process is being undertaken in terms of the NEMA: EIA Regulations (GNR 982, 4 December 2014), as amended.

To ensure that you are identified as an interested and/or affected party (I&AP) or to receive more detailed information on the project please submit your name, contact information and interest in the matter in writing to the contact person(s) given below by **3 May 2019**. Any I&APs registered on the project database will be notified when the Draft Basic Assessment Report (BAR) will be available for review and will be given the opportunity to review and submit comments on the BAR and/or summary document. The BAR and summary document will be made available in May 2019. Where responses or comments are received by 3 May 2019 these will be included in the Draft Basic Assessment Report (BAR) for public review, however I&APs will have the opportunity to submit comments until the end of the BAR review period.

Caitlin Hird or Clive Phashe

Email: chird@slrconsulting.com or cphashe@slrconsulting.com

Tel: 011 467 0945

Fax: 011 467 0978

Post: PO Box 1596, Cramerview, 2060

Note: If using post, please also contact us telephonically to notify us of your submission.



LENANEO LA GO TŠEA KAROLO GA SETŠHABA: TALETŠO YA GO NGWADIŠA LE GO SWAYASWAYA

Marula Platinum (Pty) Ltd (Marula) e diriša moepo wa platinamo wo o hwetšalago 35 km leboa bodikela bja Burgersfort Mmasepaleng wa Selegae wa Greater Tubatse le Mmasepaleng wa Selete wa Sekhukhune profenseng ya Limpopo. Marula e na le tokelo ya go rafa (nomoro ya maswanedi a go rafa 420/2006 PR) ya sehlopha sa ditšhipi sa platinamo (PGMs), mohlodi wa silifera, mohlodi wa gauta, mohlodi wa nikel, kobalte, salfa (ya paraete) le mohlodi wa koporo, mohlodi wa kroumu karolong ya borwa bja polase ya Hackney 116 KT (Hackney) ye e hwetšalago leboa la lefelo leo moepo wa Marula o nago le tokelo ya go rafa gona.

Magareng a Mei 2007 le Setemere 2012, Marula e phethagadiše modiro wa go rafa polaseng ya Hackney, ka yona nako yeo go ile gwa epiwa mekoti ya go rafa yeo e dumeletšwego. Ga bjale Marula e akanya go emiša tokelo ya Hackney ya go rafa.

Pele ga tšhišinyo ya go emiša tokelo ya go rafa, Marula e tla swanela go hwetša tumelelo ya tša tikologo go Kgoro ya Didirišwa tša Dimenerale (DMR). Go thekga se, Marula e swanetše go romela kgopelo ya go emiša tokelo ya go rafa go ya ka Karolwana 43(4) ya Molao wa Tlhabollo ya Dirafsa tša Dimenerale le Petroleamo wa (No. 28 wa 2002) (MPRDA). Go feta fao, go emiša modiro wo mongwe le wo mongwe wo go hlokegago maswanedi a go emiša toka ya go rafa go ya ka Karolo 43 ya MPRDA go latelwa Lenaneo Tsebišo 1 go ya ka Ditaolo tša Tekolo ya Kamo ya tša Tikologo (EIA), ya 2014 (yeo e fetošitšwego) gammogo le lenaneo la tekolo ya motheo go ya ka Molao wa Bosetšhaba wa Taolo ya tša Tikologo (No. 107 ya 1998) (NEMA).

SLR Consulting (Africa) (Pty) Ltd (SLR), yeo e lego sehlongwa sa go ikema sa ditsebi, e thwadilwe ke Marula go phethagatša lenaneo la tekolo ya tikologo. Lenaneo la go tšea karolo ga setšhaba le phethagatšwa go ya ka Melawana ya EIA: NEMA (GNR 982, 4 Disemere 2014), ye e fetošitšwego.

Go netefatša gore o hlathwa bjalo ka motho yo a nago le kgahlego gammogo/goba yo a amegago goba gore o fiwe tshedimošo ka botlalo malebana le projeke, ka kgopelo romela leina la gago, tshedimošo ya go ikgokaganya le wena gammogo le go bontšha kgahlego morerong wo ka go ngwalela motho yo o swanetšego go ikgokaganya le yena yo a filwego ka fase pele ga la **3 Mei 2019**. Motho yo mongwe le yo mongwe yo a nago le kgahlego goba a amegago yo a ngwadišitšwego mothopong wa tshedimošo ya projeke o tlo tsebišwa ge Pegokakanywa ya Tekolo ya Motheo (BAR) e hwetšala gore e lekolwe bile ba tla fiwa monyetla wa go lekola le go romela ditshwayo pegong ya BAR gammogo/goba kakaretšong ya sengwalwa. BAR le kakaretšo ya sengwala di tla hwetšala ka Mei 2019. Ge dikarabo goba ditshwayo di hweditšwe ka la 3 Mei 2019 di tla akaretšwa Pegongkakanywa ya Tekolo ya Motheo (BAR) gore e lekolwe ke setšhaba. Le ge go le bjalo, bao ba nago le kgahlego le bao ba amegago ba tla fiwa monyetla wa go romela ditshwayo go fihlela mafelelong a nako ya tekolo ya BAR.

Caitlin Hird goba Clive Phashe

Emeile: chird@slrconsulting.com goba cphashe@slrconsulting.com

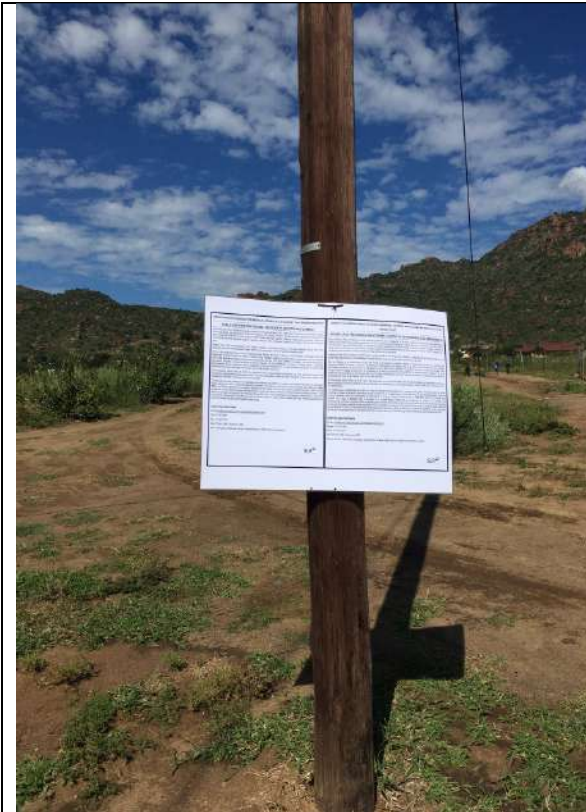
Mogala: 011 467 0945

Fekse: 011 467 0978

Poso: PO Box 1596, Cramerview, 2060

Temošo: Ge eba o diriša poso, ka kgopelo ikgokaganye le rena ka mogala gore o re tsebiše ka ga thomelo ya gago.





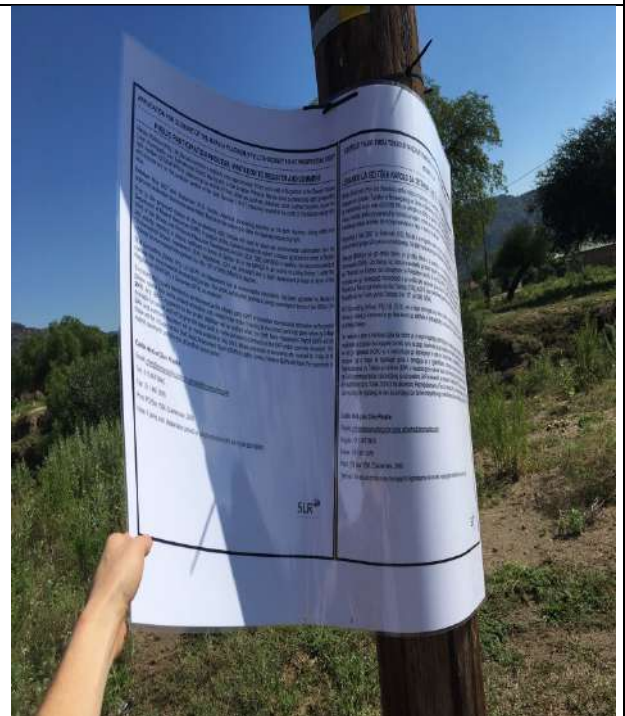
Site Photo 1



Site Photo 2



Site Photo 3



Site Photo 4



Legend

- Villages / Towns
- ▭ Hackney 116 KT Prospecting Right Area
- Boreholes
- Perennial Rivers
- - - Non-Perennial Rivers
- ✱ Location of Site Notices

0 100 200 Meters

Scale: 1:10 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mines

Figure 4

Location of Site Notices



SLR Consulting (Africa) (Pty) Ltd
 P O Box 1596, Cramerview, 2060, South Africa
 Tel: +27 (11) 467-0945 Fax: +27 (11) 467-0978

MARULA PLATINUM (PTY) LTD

BACKGROUND INFORMATION DOCUMENT FOR THE CLOSURE OF THE HACKNEY 116 KT PROSPECTING RIGHT

APRIL 2019

INTRODUCTION

Marula Platinum (Pty) Ltd (Marula) (of which the shareholding is 73% held by Impala Platinum Holdings Limited, 9% held by Mmakau Platinum Mining (Pty) Ltd, 9% held by Tubatse Platinum (Pty) Ltd, and 9% held by the Marula Community Trust) owns and operates a platinum mine approximately 35 km north west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province.

Marula's holds a prospecting right (prospecting right number 420/2006 PR) for platinum group metals (PGMs), silver ore, gold ore, nickel ore, cobalt, sulphur (in pyrite), copper ore and chrome ore on the southern section of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area (Figure 1).

Marula is now planning to close the Hackney prospecting right.

ENVIRONMENTAL AUTHORISATION PROCESS

Prior to the proposed closure of the prospecting right, Marula will need to obtain environmental authorisation from the Department of Mineral Resources (DMR).

In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA).

In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required. In this regard, the Environmental Impact Assessment Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

The EIA process being undertaken will address the closure requirements of the MPRDA and NEMA.

PURPOSE OF THIS DOCUMENT

This document has been prepared by SLR to inform you about:

- The proposed prospecting right closure
- The prospecting right area
- The environmental assessment process being followed (Basic Assessment Process)
- Possible environmental/cultural/socio-economic impacts
- How you can have input into the environmental assessment process.

SLR Consulting (Africa) (Pty) Ltd

YOUR ROLE

You have been identified as an interested and/or affected party (I&AP) who may want to be informed about the proposed project and have input into the environmental process and report. To register as an interested and/or affected party (I&AP) please submit your name, contact information and interest in the matter in writing to the contact person(s) given below by **3 May 2019**.

Any I&APs registered on the project database will also be given the opportunity to review and comment on the BAR when it becomes available for public review in May 2019.

Where responses to this document or comments are received by 3 May 2019 these will be included in the Draft Basic Assessment Report (BAR) for public review, however I&APs will have the opportunity to submit comments until the end of the BAR review period.

All comments received will be recorded and included in the report submitted to the DMR for decision-making.

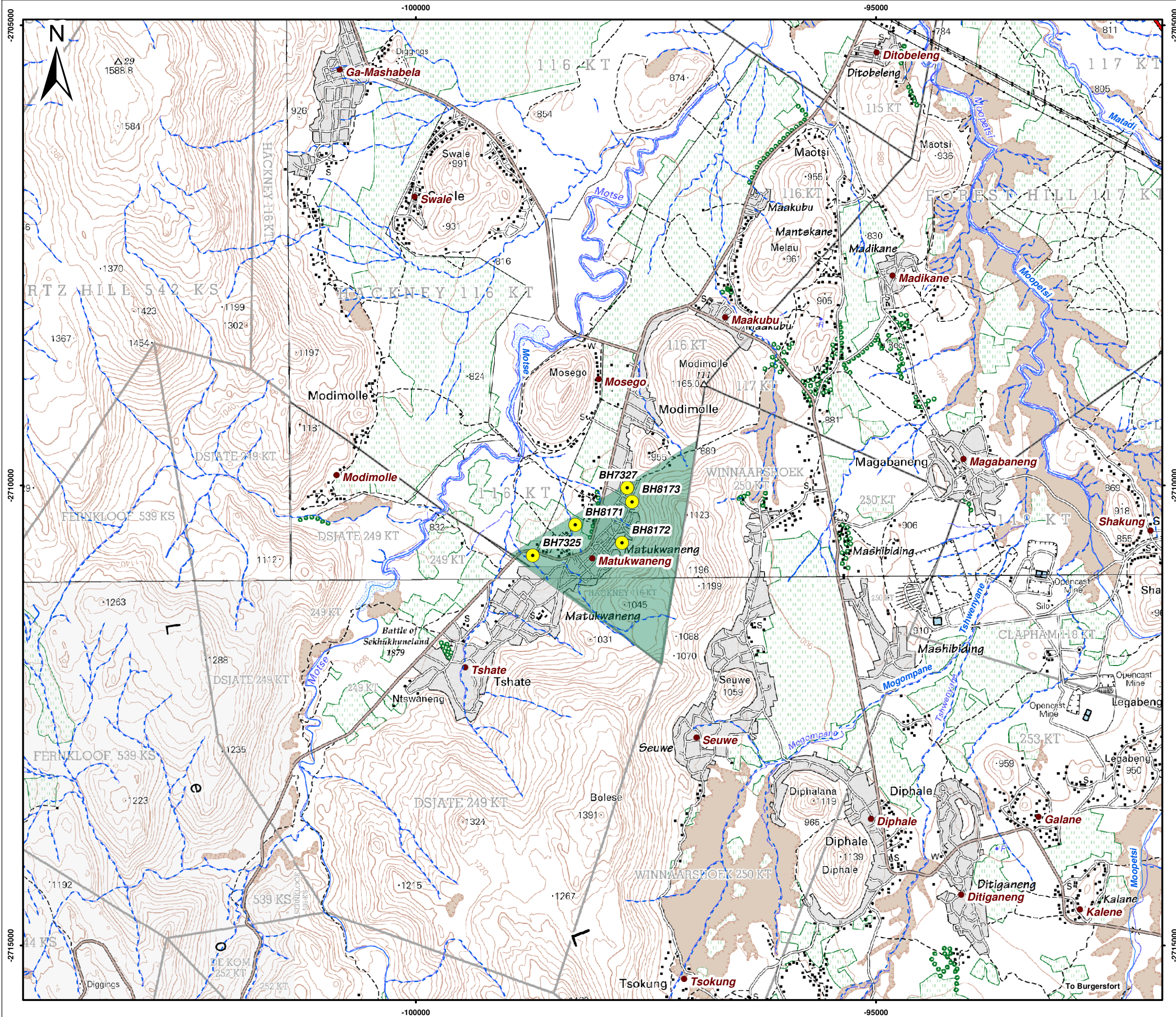
HOW TO RESPOND

Responses to this document can be submitted by means of the attached comments sheet and/or through communication with the person listed below.

WHO TO CONTACT

Caitlin Hird or Clive Phashe
(011) 467 0945 (Tel) or
(011) 467 0978 (Fax) or
chird@slrconsulting.com or
cphashe@slrconsulting.com

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Marula Platinum (Pty) Ltd to manage the environmental assessment process.



- Legend**
- Villages / Towns
 - Main Roads
 - Power Line
 - Rivers and Streams
 - 20m Contour Lines
 - Hackney Prospecting Right Area
 - Boreholes

0 500 1 000 Meters
 Scale: 1:40 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mines

Figure 1
 Local Setting

SLR
 SLR Consulting (Africa) (Pty) Ltd
 P O Box 1596, Cramerville, 2060, South Africa
 Tel: +27 (11) 467-0945 Fax: +27 (11) 467-0978

PROJECT OVERVIEW

OVERVIEW

Marula holds a prospecting right on the southern section of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area (Figure 1).

Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time five approved exploration boreholes were drilled. Prospecting activities included the establishment of temporary contractor's camps and temporary access roads. For each drill site, once drilling was complete, the site was decommissioned. Decommissioning catered for the capping and sealing of boreholes, removal of any drilling equipment, chemicals and waste, treatment and filling of sumps and ripping of compacted soils (at drill sites and access tracks) to allow for re-vegetation of the site.

Marula now wishes to close the Hackney prospecting right and to exclude this area from its approved EMPr. It is planned by Marula that the areas disturbed by the prospecting activities are allowed to re-vegetate and be used by community members as was done prior to the prospecting activities.

MOTIVATION FOR THE PROPOSED PROJECT

Since Marula has been denied access to the Hackney prospecting right area, a Board decision was taken to discontinue (abandon) prospecting activities and exit from the Hackney project. Marula has informed the community of this. Abandoning the prospecting right would allow for new third party applications to be lodged with the DMR.

STATUS OF ENVIRONMENT

This section provides a short description of the prospecting right area.

The prospecting right area lies in the Leolo Mountains and its foothills, and is drained by several unnamed non-perennial tributaries (quaternary catchment B71E) of the Motse River which flow in a north westerly direction. Given then non-perennial nature of watercourses, there is no third party reliance on surface water.

Geologically, the prospecting right area is situated in the Bushveld Igneous Complex (BIC), an intrusive igneous body. The minerals being targeted as part of exploration drilling are the same as those being mined by Marula. The area is underlain by two aquifers; namely a shallow, weathered aquifer and a deeper fractured rock aquifer. Groundwater quality is generally marginal to poor due to elevated nitrate concentrations.

Third party water users rely on groundwater for domestic and agricultural purposes. The area falls within a predominantly rural settlement area with the main land uses in the broader area being prospecting, mining, subsistence farming, and

grazing, residential. These land uses have influenced noise levels, ambient air quality and visual the visual landscape of the broader area. Socio-economically, educational levels in the broader area are relatively low with a high level of unemployment. Service provision remains a challenge.

The area experiences typical savannah climatic conditions, namely hot and wet summers and cold and dry winters. The mean annual rainfall is approximately 600 mm per annum.

The soils overlying the area are generally clayey (vertic/melanic) and have a low yielding agricultural potential. The vegetation overlying these soils forms part of a regional complex type known as the Arid Northern Bushveld. The majority of the vegetation is severely transformed with a high incidence of bush encroachment. The plant community on the hills and mountains are considered highly sensitive. Very little evidence of wild faunal populations is associated with the general area due to the presence of mining, prospecting, farming and community activities.

Heritage and cultural resources have been identified within the prospecting right area. Some of these resources, particularly the Tsjate Provincial Heritage Site is important to the history of South Africa and is protected by national legislation. It is also possible that palaeontological resources (fossils) may occur in the superficial deposits of calcrete and sands.

POTENTIAL ENVIRONMENTAL/CULTURAL/SOCIO-ECONOMIC IMPACTS

Given the nature of the prospecting right closure, impacts are expected to be limited to:

- Loss of biodiversity and pre-mining land use if any residual contamination exists (considered unlikely) and if revegetation isn't successful (to be determined).
- Dust generation (if site is not appropriately rehabilitated).
- Potential loss of social and economic benefits to contractors by not continuing with the prospecting, but it's assumed that contractors would find contracts elsewhere.
- Resource becomes available for other potential prospectors.

NOTE: Drill sites and surrounding areas are currently used for livestock grazing, with evidence of overgrazing and compaction of soils. This would likely hamper the re-establishment of vegetation.

ENVIRONMENTAL AUTHORISATION PROCESS

The environmental assessment process provides:

- Information on the project and environment in which it is being undertaken
- Identifies, in consultation with I&APs the potential negative as well as positive environmental/cultural/socio-economic impacts
- Reports on management measures required to mitigate impacts and incorporates requirements for monitoring programmes (where required).

The likely process steps and timeframes are provided below.

PHASE I - Pre-application phase (March to April 2019)

- Pre-application meeting with the DMR
- Notify commenting authorities and I&APs of proposed project and environmental assessment (via newspaper adverts, site notices and BID)

PHASE II – BAR phase (April to June 2019)

- Submission of NEMA application to DMR
- Compile BAR and summary, distribute to I&APs and commenting authorities for 30 day review (May 2019)
- Update the BAR with comments received during the public review period

PHASE III – Competent authority review phase (June to October 2019)

- Submit BAR (inclusive of comments raised during the review period) to the DMR for decision making (end June 2019) (107 days legislated decision making period)
- Circulate decisions to I&APs on project database

PARTIES INVOLVED IN THE ENVIRONMENTAL ASSESSMENT PROCESS

IAPs

- * Surrounding landowners, land users and communities
- * Surrounding mines and industries
- * Parastatals

COMPETENT AND COMMENTING AUTHORITIES

- * Limpopo Department of Mineral Resources (DMR)
- * Limpopo Department of Economic Development, Environment and Tourism (LEDET)
- * Limpopo Department of Water and Sanitation (DWS)
- * Limpopo Department of Rural Development and Land Reform (DRDLR)
- * South Africa Heritage Resource Agency (SAHRA) and/or Limpopo Heritage Resources Agency (LHRA)

LOCAL AUTHORITIES

- * Greater Tubatse Local Municipality (incl ward councillor)
- * Sekhukhune District Municipality

Please let us know if there are any additional parties that should be involved.

MARULA PLATINUM (PTY) LTD
BACKGROUND INFORMATION DOCUMENT FOR THE CLOSURE OF THE HACKNEY 116 KT
PROSPECTING RIGHT
REGISTRATION AND RESPONSE FORM FOR INTERESTED AND AFFECTED PARTIES

DATE		TIME	
PARTICULARS OF THE INTERESTED AND AFFECTED PARTY			
NAME			
POSTAL ADDRESS			
		POSTAL CODE	
STREET ADDRESS			
		POSTAL CODE	
WORK/ DAY TELEPHONE NUMBER		WORK/ DAY FAX NUMBER	
CELL PHONE NUMBER		E-MAIL ADDRESS	

PLEASE IDENTIFY YOUR INTEREST IN THE PROPOSED PROJECT

PLEASE WRITE YOUR COMMENTS AND QUESTIONS HERE

Please return completed forms to:
 Caitlin Hird or Clive Phashe
 SLR Consulting (Africa) (Pty) Ltd
 (011) 467 0945 (Tel) and/or (011) 467 0978 (Fax)
chird@slrconsulting.com or cphashe@slrconsulting.com

MARULA PLATINUM (PTY) LTD

SENGWALWA SA TSHEDIMOŠO YA SEEMO SA GO EMIŠA TOKELO YA HACKNEY YA GO RAFA DIMENERALE

APRELE 2019

Matseno

Marula Platinum (Pty) Ltd (Marula) (yeo 73% ya gona e leng ya Impala Platinum Holdings Limited, 9% ke ya Mmakau Platinum Mining (Pty) Ltd, 9% ke ya Tubatse Platinum (Pty) Ltd, le 9% e e tshwereng ke Marula Community Trust) e diriša moepo wa platinamo wo o hwetšalago bokgole bja 35 km leboa bodikela ga Burgersfort Mmasepaleng wa Selegae wa Greater Tubatse le Mmasepaleng wa Selete wa Sekhukhune profenseng ya Limpopo.

Marula e na le tokelo ya go rafa (nomoro ya maswanedi a go rafa 420/2006 PR) ya sehlopha sa ditšhipi sa platinamo (PGMs), mohlodi wa silifera, mohlodi wa gauta, mohlodi wa nikele, kobalte, salfa (ya paraete) le mohlodi wa koporo, mohlodi wa kroumu karolong ya borwa bja polase ya Hackney 116 KT (Hackney) ye e hwetšalago leboa la lefelo leo moepo wa Marula o nago le tokelo ya go rafa gona (Seswantšho 1).

Ga bjale Marula e akanya go fediša tokelo ya Hackney ya go rafa.

LENANEO LA TUMELELO YA TŠA TIKOLOGO

Pele ga tšhišinyo ya go emiša tokelo ya go rafa, Marula e tla swanela go hwetša tumelelo ya tša tikologo go Kgoro ya Didirišwa tša Dimenerale (DMR).

Go thekga se, Marula e swanetše go romela kgopelo ya go emiša tokelo ya go rafa go ya ka Karolwana 43(4) ya Molao wa Tlhabollo ya Dirafsa tša Dimenerale le Petroleamo wa (No. 28 wa 2002) (MPRDA)

Go feta fao, go emiša modiro wo mongwe le wo mongwe wa go rafa go hlokega maswanedi a go emiša toka ya go rafa go ya ka Karolo 43 ya MPRDA gape go latelwa Lenaneo Tsebišo 1 go ya ka Ditaolo tša Tekolo ya Kamo ya tša Tikologo (EIA), ya 2014 (yeo e fetošitšwego) gammogo le lenaneo la tekolo ya motheo go ya ka Molao wa Bosetšhaba wa Taolo ya tša Tikologo (No. 107 ya 1998) (NEMA). Ka fao, Melawana ya Tekolo ya Kamo ya tša Tikologo yeo e latelwago ke Melawana ya Mmušo ya Tsebišo (GNR) 982 ya 4 Disemere 2014, yeo e fetošitšwego. Lenaneo la EIA leo le phethagatšwago le tlo bolela ka dinyakwa tša go emiša tša MPRDA le NEMA.

MORERO WA SENGWALWA SE

Sengwalwa se se beakantšwe ke SLR go go tsebiša ka:

- Tšhišinyo ya go emiša tokelo ya go rafa
- Lefelo leo go nago le tokelo ya go rafa
- Lenaneo la tekolo ya tša tikologo leo le latelwago (Lenaneo la Tekolo ya Motheo)
- Kgonalo ya kamo ya tša tikologo/setšo/ikonomi ya setšhaba
- Gore o ka ba le seabe bjang lenaneong la tekolo ya tša tikologo.

SLR Consulting (Africa) (Pty) Ltd

KAROLO YA GAGO

O hlaotšwe bjalo ka motho yo a nago le kgahlego gammogo/goba yo a amegago yo a ka nyakago gore a tsebišwe ka projeke ye e šišinywago le go ba le seabe lenaneong la tekolo ya tša tikologo le pego. Gore o ingwadiše bjalo ka motho yo a nago le kgahlego gammogo/goba yo a amegago, ka kgopelo romela leina la gago, tshedimošo ya go ikgokaganya le wena gammogo le go bontšha kgahlego morerong wo ka go ngwalela motho yo o swanetšego go ikgokaganya le yena yo a filwego ka fase pele ga la

3 Mei 2019.

Motho yo mongwe le yo mongwe yo a nago le kgahlego goba a amegago yo a ngwadišitšwego mothopong wa tshedimošo ya projeke o tlo fiwa monyetla wa go lekola le go swaya sengwalwa sa BAR ge se hwetšala gore se lekolwe ke setšhaba ka Mei 2019.

Ge dikarabo goba ditshwayo di hweditšwe ka la 3 Mei 2019 di tla akaretšwa go Pegokakanywa ya Tekolo ya Motheo (BAR) gore e lekolwe ke setšhaba. Le ge go le bjalo, bao ba nago le kgahlebo le bao ba amegago ba tla fiwa monyetla wa go romela ditshwayo go fihlela mafelelong a nako ya tekolo ya BAR.

Ditshwayo ka moka tšeo fi tla amogelwago di tla ngwalwa le go akaretšwa pegong yeo e tlogo romelwa DMR gore e tšee sephetho.

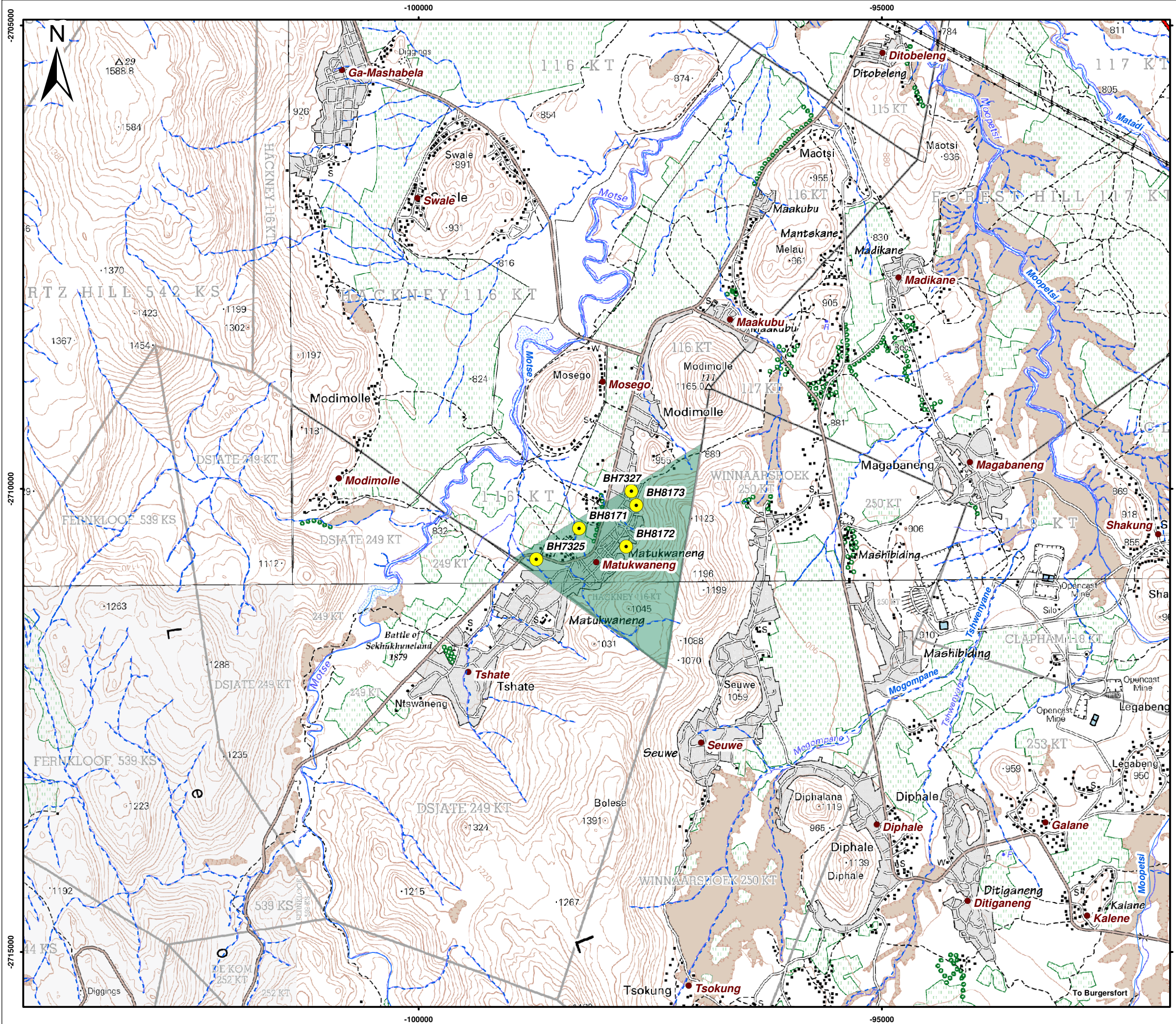
MOKGWA WA GO ARABA

Dikarabo sengwalweng se di ka romelwa ka go metletša letlakala la ditshwayo gammogo/goba ka go ikgokaganya le batho bao maina a bona a filwego ka fase.

YO O KA IKGOKAGANYAGO LE YENA

Caitlin Hird goba Clive Phashe
(011) 467 0945 (Mogala) goba
(011) 467 0978 (Fekse) goba
chird@slrconsulting.com goba
cphashe@slrconsulting.com

SLR Consulting (Africa) (Pty) Ltd (SLR), yeo e lego sehlongwa sa go ikema sa ditsebi, e thwadilwe ke Marula go phethagatša lenaneo la tekolo ya tikologo.



- Legend**
- Villages / Towns
 - Main Roads
 - Power Line
 - Rivers and Streams
 - 20m Contour Lines
 - Hackney Prospecting Right Area
 - Boreholes

0 500 1 000 Meters
 Scale: 1:40 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mines

Seswantsho 1
 Tikologo ya lefelo le dikarolo tša projeke



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 Tel: +27 (11) 467-0945 Fax: +27 (11) 467-0978

710.09002.00016

2019/04/15

KAKARETŠO YA PROJEKE

KAKARETŠO

Marula e na le tokelo ya go rafa dimenerale karolong ya borwa bja polase ya Hackney 116 KT (Hackney) yeo e hwetšalago leboa la lefelo leo moepo wa Marula o nago le tokelo ya go rafa (Seswantšho 1).

Magareng a Mei 2007 le Setemere 2012, Marula e phethagaditše modiro wa go rafa dimenerale polaseng ya Hackney, ka yona nako yeo go ile gwa epiwa mekoti ye mehlano ya go rafa yeo e dumeletšwego. Modiro wa go rafa o akaretša go hloma kampa ya lebakanyana ya rakontraka gape le ditsela tša lebakanyana. Lefelo le lengwe le lengwe leo go bego go epiwa, ge go feditšwe, lefelo leo le ile la tswalelwa. Go tswalelwa go akaretša go khurumetša le go khupetša mekoti, go tloša didirišwa tša go epa, dikhemikhale le dilahlwa, go hlahloba le go khupetša mekoti ya dilahlwa gammogo le go thuba makwate a mmu (mafelong a go epa le ditseleng) gore dimela di mele gape lefelong leo.

Ga bjale Marula e rata go emiša tokelo ya go rafa polaseng ya Hackney me ba nyaka go ntšha lefapha le go tokelo e ba nang le yona ya go rafa . Marula e akanya gore mafelo ao a amilwego ke mediro ya go rafa a tlogelwe gore a mediše dimela gape le go šomišwa ke maloko a setšhaba ka fao ba beo ba a diriša ka gona pele ga merero ya go rafa.

TLHOHLOLETŠO YA PROJEKE YE E ŠIŠINTŠWEGO

Ka ge Marula e thibelwa go šoma lefelong la Hackney fao e nago le tokelo ya go rafa, sepheto se se tšerweng ke baswari ba kgwebo ke sa go emiša mešomo ya go rafa le go tlogela porojeke e ya Hackney. Marula e buditše ba sechaba ka ga se. Go tlogela toka ya go rafa go tla fa dikgwebo tše ding sebaka sa go tšenya dikopo tša go rafa le ba ga DMR.

SEEMO SA TIKOLOGO

Karolo ye e abela tlhalošo ka boripana ya lefelo la tokelo ya go rafa.

Lefelo la tokelo ya go rafa le hwetšala Dithabeng tša Leolo le mebotong ya gona, yeo go putlago melapo (ya maemo a bone B71E) ye mmalwa ye e elago ge pula e nele feela ya go tšhelela Noka ya Motse yeo yona e elelago leboa bodikela. Ka ge go hlalošitšwe gore meetse a elela ge feela pula e nele, ga go mothopo wo mongwe wo go ka itshephiwago ona wa go abela meetse.

Go ya le ka sebopego sa lefase, lefelo la tokelo ya go rafa le hwetšala Bushveld Igneous Complex (BIC), lefelo leo le tletše ka maswika a mohuta wa iknease (igneous). Dimenerale tšeo di šeditšwego gore di rafše di swana le tšeo di rafšago ke moepo wa Marula. Lefelo leo le na le dileyara tše pedi tša maswika; ona ke leswika leo le sego ka fase ga mmu leo le fetogilego mmala ka baka la boso gammogo le leswika leo le lego ka fase ga mmu la go palega. Boleng bja meetse a ka fase

ga mmu gantši bo tloga e le bja fase ka baka la naetreite ye e tletšego.

Badiriši ba boraro ba meetse ba botile meetse a ka fase ga mmu gore ba a diriše mererong ya mešongwana ya ka gae le go tša temo. Lefelo leo le wela ka legorong la bodulo bja metsesegae fao naga e dirišwago kudu go rafa dimenerale, go itemela, bodulo, le go fula. Tirišo ye ya naga e ama gampe maemo a lešata, boleng bja moya lefaufaug le ponagalo ya sebopego sa lefase lefelong leo ka bophara. Maemo a ikonomi ya setšhaba le a tša thuto lefelong leo ka bophara a tloga a le fase kudu mola tlhokego ya mošomo e tloga e le godimo kudu. Kabo ya ditirelo e tloga e le tlhobaboroko.

Lefelo leo le itemogela maemo a tša boso ao a tlwaelegilego lefelong la savannah, ona ke phišo le pula ya selemo gape le phefo ya marega a go hloka pula. Bontši bja pula ye e nago ka ngwaga ka tlwaelo ke 600 mm ka ngwaga.

Mmu wa lefelo leo wona ke wa letsopa gape le maemo a fase a tšweletšo ya tša temo. Dimela tšeo di hwetšalago mmung wo di bopa mohuta wa lefelo la tikologo leo le tsebjago bjale ka Arid Northern Bushveld. Bontši bja dimela bo dirwa ke go tlala ga mehlašana. Mohuta wa dimela tšeo di hwetšalago mebotong le dithabeng ga se ditiele. Go tloga go na le bohlatse bjo bonyane bja diphedi tša naga tše di amanywago le lefelo le ka lebaka la moepo, temo, le mediro ya setšhaba.

Methopo ya tša bohwa le setšo di laeditšwe gona mo lefelong la go rafa dimenerale. Ye mengwe ya methopo ye, e lego Lefelo la Bohwa la Profense la Tsjate, le bohlokwa historing ya Afrika Borwa bile le šireleditšwe ke molaotheo wa naga. Go a kgonega gore marapo ao a lego ka gare ga maswika (fossils) a direge mašaleding a kalkrete (calcrete) le mohlaba.

KGONALO YA KAMO YA TŠA TIKOLOGO /SETŠO/IKONOMI YA SETŠHABA

Ka lebaka la tihlago ya modiro wa go emiša tokelo ya go rafa dimenerale, kamo e letetšwe go:

- Tobo ya mehuta ya diphedi le dimela tša tikologo le tšhomišo ya naga pele ga merero ya go rafa dimenerale ge go ka ba le tšhilafatšo ya mašaledi (go akanywa gore go ka se kgonege) le ge go melalefsa ga dimela go sa atlege (go sa tlo hlathwa).
- Go tupa ga lerole (ge lefelo le sa hlokomelwe ka mokgwa wa maleba).
- Kgonalo ya go loba menyetla ya ikonomi go borakotraka ka go se tšwelepele ka morero wa go rafa dimenerale, eupša go ukangwa gore borakotraka ba tlo hwetša dikotraka felogongwe.
- Didirišwa di tla hwetšala gore di dirišwe ke ba bangwe bao ba ka bago le kgahlego ya go rafa dimenerale.

•
TOMOŠO: Mafelo a moepo le tikologo ya kgauswi di dirišetšwa go fula ga leruo, bile go a bonagala gore leruo le fula go feta ka fao go swanetšego gammogo le go tielela ga mmu. Se se tlo šitiša go melalefsa ga dimela.

LENANEO LA TUMELELO YA TŠA TIKOLOGO

Lenaneo la tekolo ya tša tikologo le aba:

- Tshedimošo ya projeke le tikologo yeo e phethagatšwago gona
- Go laetša, ka go šomišana le bao ba nago le kgahlego le bao ba amegago kgonalo ya kamompe le menyetla ya tikologo/setšo/ikonomi ya setšhaba
- Go fa pego ya mekgwa ya taolo yeo e nyakegago go efoga kamompe le go akaretša dinyakwa tša go lekodiša mananeo (fao go hlokegago).

Magato a lenaneo le dinako di filwe ka fase.

LEGATO I – Legato la pele go dirwa kgopelo (Matšhe go fihlela Aprele 2019)

- Kopano ya pele go dirwa kgopelo le DMR
- Tsebiša balaodi bao ba swayago le bao ba nago le kgahlego le bao ba amegago ka ga projeke ye e šišinywago le tekolo ya tša tikologo (ka papatšo kulanteng, ditsebišo tša lefelo la bošomelo le BID)

LEGATO II – Legato la BAR (Aprele go fihlela June 2019)

- Go romela kgopelo ya NEMA go DMR
- Go kgoboketša pego BAR le kakaretšo le go e phatlalatša gore e fihlele bao ba nago le kgahlego le bao ba amegago le balaodi bao ba swayago nakong ya matšatši a 30 a tekolo (Mei 2019)
- Go tsenya tshedimošo ye mpsha pegong ya BAR malebana le ditshwayo tše di amogetšwego nakong ya tekolo ka setšhaba

LEGATO III – Legato la tekolo ka balaodi ba go ba le bokgoni

(June go fihlela Oktobere 2019)

- Romela pego ya BAR (go akaretša ditshwayo tše di dirilwego nakong ya tekolo) go DMR gore e tšee sephetho (go fihlela ka June 2019) (nako yeo e beilwego semolago ya go tšea sephetho ke matšatši a 107)
- Phatlalatša sephetho gore bao ba nago le kgahlego le bao ba amegago ba lego mothopong wa tshedimošo ya projeke ba tsebe

BATŠEAKAROLO BA LENANEO LA TEKOLO YA TŠA TIKOLOGO

BAO BA NAGO LE KGAHLEGO LE BAO BA AMEGAGO

- * Bengnaga, badiriši ba naga le setšhaba
- * Meepo ya kgauswi gammogo le diintasteri
- * Dihlongwa tša mmušo

BALAODI BA BOKGONI BAO BA SWAYAGO

- * Kgoro ya Didirišwa tša Dimenerale ya Limpopo (DMR)
- * Kgoro ya Tlhabollo ya Ikonomi, Tikologo le tša Boeti ya Limpopo (LEDET)
- * Kgoro ya Meetse le Kelelatšhila ya Limpopo (DWS)
- * Kgoro ya Tlhabollo ya Metseselegae le Naga ya Limpopo (DRDLR)
- * Setheo sa Afrika Borwa sa tša Bohwa (SAHRA) le/goba Setheo sa tša Bohwa sa Limpopo (LHRA)

BALAODI BA SELEGAE

- * Mmasepala wa Selegae wa Greater Tubatse (go akaretša le mokhanselara wa ward)
- * Mmasepala wa Selete wa Sekhukhune

Ka kgopelo, re tsebiše ge go na le maloko a mangwe ao o naganago gore ba swanetše go akaretšwa.

MARULA PLATINUM (PTY) LTD

**SENGWALWA SA TSHEDIMOŠO YA SEEMO SA GO EMIŠA TOKELO YA HACKNEY 116 KT
YA GO RAFA DIMENERALE
FOMO YA BOINGWADIŠO LE DIKARABO TŠA BAO BA NAGO LE KGAHLEGO LE BAO BA
AMEGAGO**

LETŠATŠI-KGWEDI		NAKO	
TSHEDIMOŠO YA BAO BA NAGO LE KGAHLEGO LE BAO BA AMEGAGO			
LEINA			
ATERESE			
		KHOUTU YA POSO	
ATERESE YA MMILA			
		KHOUTU YA POSO	
NOMORO YA MOŠOMONG/ YE O KA HWETŠALAGO GO YONA		NOMORO YA FEKSE YA MOŠOMONG/ YE RE KA GO HWETŠAGO KA YONA	
NOMORO YA SELLATHEKENG		ATERESE YA E-MEILE	

KA KGOPELO LAETŠA KGAHLEGO YA GAGO PROJEKENG YE E ŠIŠINYWAGO

--

KA KGOPELO NGWALA DITSHWAYO GOBA DIPOTŠIŠO TŠA GAGO FA

--

Ka kgopelo fihliša fomo ye e tladitšwego go:

**Caitlin Hird goba Clive Phashe
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Clive Phashe

From: Clive Phashe
Sent: 17 April 2019 03:32 PM
To: Clive Phashe
Cc: JC Pretorius
Subject: Project: Marula Platinum Mine- Hackney Prospecting Right Closure
Attachments: 2019-04-11-BID-Hackney PR Closure.pdf; 2019-04-11-BID-Hackney PR Closure Sepedi.pdf

Importance: High

Tracking:

Recipient

Delivery

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JC Pretorius	Delivered: 2019/04/17 03:33 PM
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Dear Interested and Affected Party

Marula Platinum (PTY) Ltd (Marula) holds a prospecting right on the southern section of the farm Hackney 116 KT (Hackney) located to the north of the Marula mining right area approximately 35 km north west of Burgersfort in the Greater Tubatse Local Municipality and Sekhukhune District Municipality in the Limpopo Province.

Between May 2007 and September 2012, Marula undertook prospecting activities on the farm Hackney, during which time five approved exploration boreholes were drilled. Prospecting activities included the establishment of temporary contractor's camps and temporary access roads. For each drill site, once drilling was complete, the site was decommissioned. Decommissioning catered for the capping and sealing of boreholes, removal of any drilling equipment, chemicals and waste, treatment and filling of sumps and ripping of compacted soils (at drill sites and access tracks) to allow for re-vegetation of the site. Marula now wishes to close the Hackney prospecting right and to exclude this area from its approved EMPr.

Prior to the proposed closure of the prospecting right, Marula will need to obtain environmental authorisation from the Department of Mineral Resources (DMR). In support of this, Marula is required to submit a closure application in terms of Section 43(4) of the Mineral and Petroleum Resources Development Act (No. 28 of 2002) (MPRDA). In addition, the decommissioning of any activity requiring a closure certificate in terms of Section 43 of the MPRDA is an activity in Listing Notice 1 under the EIA Regulations, 2014 (as amended) and a basic assessment process in terms of the National Environmental Management Act (No. 107 of 1998) (NEMA) is required. In this regard, the Environmental Impact Assessment Regulations being followed are Government Notice Regulation (GNR) 982 of 4 December 2014, as amended.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental consultants, has been appointed by Marula Platinum (Pty) Ltd to manage the environmental assessment process.

The attached Background Information Document (BID) (in both English and Sepedi) has been prepared to provide you with background information on the planned prospecting right closure and provide you with an opportunity to have input into the environmental assessment process.

Should you have any queries please contact SLR.

Thank you



Clive Phashe

EMPA Intern

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27843911626	CELL C	EXPIRED	4/17/2019 3:28:00 PM	4/17/2019 3:28:33 PM
27740374061	CELL C	EXPIRED	4/17/2019 3:28:00 PM	4/17/2019 3:28:33 PM
27761620380	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27764704937	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27764874609	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27765271137	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27765317005	Vodacom	EXPIRED	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27765534002	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27766162291	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27766313392	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27768050326	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27769373153	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27769376519	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27786569454	MTN	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27787933087	MTN	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM
27790116945	Vodacom	DELIVRD	4/17/2019 3:28:00 PM	4/17/2019 3:28:32 PM

SentData

Notice to IAPs registered on Marulas database: Marula is proposing to close its prospecting right on the farm Hackney 116 KT.

Background information documents are available at the mine or alternatively please contact Thapelo Phasha of SLR Consulting (0114670945) for more information.





From: [Mpho Ngobeni](#)
To: [Caitlin Hird](#)
Cc: [Clive Phashe](#)
Subject: Public participation
Date: 02 May 2019 09:07:50 AM
Attachments: [public participation process.jpg](#)

Good morning team

Can you please register me to form the part of Public Participation Process

Kind regards
Given Ngobeni

From: [abramlepatla](#)
To: [Caitlin Hird](#)
Subject: Hackneyed 116kt Maryland mine close application of prospecting rights.
Date: 26 April 2019 10:42:56 AM

Good day sir/madam I'm Mr Abram lepatla kopotja from tjate village I form part of hackney farm 116kt community .I have interest to be part of your public participation about Marula mine closing application.

I will attend with members of hackneye development committee we are twelve in numbers. But we are also very surprised to see this pappers of closing application but your company not contacting the committee is very wrong to do so.

My contact 0735764198 or Berry mohlala 07300302244

Regards

Sent from my Samsung Galaxy smartphone.

From: [Abram Lepatla](#)
To: [Caitlin Hird](#)
Subject: RE: Hackney 116kt Marula mine close application of prospecting rights.
Date: 26 April 2019 02:02:28 PM
Attachments: [image62281f.PNG](#)
[imagece4090.PNG](#)
[image721fbc.PNG](#)
[image33402d.PNG](#)
[image45bd9f.PNG](#)
[image7f0077.PNG](#)
[image677b90.PNG](#)
[image856342.PNG](#)
[image36cae4.JPG](#)

Thanks for replying you where not supposed to talk to kgoshi mashabela alone what about tjate community talk to Marula mine to provide you with memorandum of understanding and the names of the current committee I'm the one of them and we are not happy the way you do things this is brotherly advice is not only kgoshi being affected please do the right thing we need to meet you.

Regards

On 26 Apr 2019 10:58, "Caitlin Hird" <chird@slrconsulting.com> wrote:

Good morning Abram

Thank you for your interest in the project. Please see attached Background Information Document (BID) (in English and Sepedi) which will provide you with more detail relating to Marula's proposed closure of the Hackney 116 KT prospecting right. Should you wish to obtain a hard copy of the BID this can be collected from the mine offices.

SLR has tried to make contact with Kgoshi Mashabela since 16 April 2019, however has only managed to reach him this morning. The site notices have been placed as a legal requirement (in accordance with the requirements of Chapter 6 of the Environmental Impact Assessment Regulations (GNR 982 of 2017) 2014) to notify the community of the planned closure of the prospecting right and to invite stakeholders to provide input into the public participation process.

We have included your details in the stakeholder database and you will be notified when the Basic Assessment Report is available for review.

Should you have any queries please contact Mr Clive Phashe (SLR) on 011 476 0945.

Thank you



Caitlin Hird

Environmental Assessment Practitioner

+27 84 491 1987

+27 11 467 0945

2030

chird@slrconsulting.com

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From: abramlepatla [mailto:abramlepatla@gmail.com]

Sent: 26 April 2019 10:43 AM

To: Caitlin Hird

Subject: Hackneyed 116kt Maryland mine close application of prospecting rights.

Good day sir/madam I'm Mr Abram lepatla kopotja from tjate village I form part of hackney farm 116kt community .I have interest to be part of your public participation about Marula mine closing application.

I will attend with members of hackneye development committee we are twelve in numbers.But we are also very surprised to see this pappers of closing application but your company not contacting the committee is very wrong to do so.

My contact 0735764198 or Berry mohlala 07300302244

Regards

Sent from my Samsung Galaxy smartphone.

From: [Abram Lepatla](#)
To: [Caitlin Hird](#)
Subject: RE: Hackneyed 116kt Maryland mine close application of prospecting rights.
Date: 29 April 2019 11:08:39 AM
Attachments: [image721fbc.PNG](#)
[image62281f.PNG](#)
[imagece4090.PNG](#)
[image7f0077.PNG](#)
[image677b90.PNG](#)
[image33402d.PNG](#)
[image36cae4.JPG](#)
[image45bd9f.PNG](#)
[image856342.PNG](#)

Our worries is that before you continue with public participation why you not consult the affected communities to be aware of what Marula planning for you just paste the papers without informing the committee that it will be false public participation please do the right thing ask Marula that were you can find the leaders.

On 26 Apr 2019 10:58, "Caitlin Hird" <chird@slrconsulting.com> wrote:

Good morning Abram

Thank you for your interest in the project. Please see attached Background Information Document (BID) (in English and Sepedi) which will provide you with more detail relating to Marula's proposed closure of the Hackney 116 KT prospecting right. Should you wish to obtain a hard copy of the BID this can be collected from the mine offices.

SLR has tried to make contact with Kgoshi Mashabela since 16 April 2019, however has only managed to reach him this morning. The site notices have been placed as a legal requirement (in accordance with the requirements of Chapter 6 of the Environmental Impact Assessment Regulations (GNR 982 of 2017) 2014) to notify the community of the planned closure of the prospecting right and to invite stakeholders to provide input into the public participation process.

We have included your details in the stakeholder database and you will be notified when the Basic Assessment Report is available for review.

Should you have any queries please contact Mr Clive Phashe (SLR) on 011 476 0945.

Thank you



Caitlin Hird

Environmental Assessment Practitioner

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From: abramlepatla [mailto:abramlepatla@gmail.com]

Sent: 26 April 2019 10:43 AM

To: Caitlin Hird

Subject: Hackneyed 116kt Maryland mine close application of prospecting rights.

Good day sir/madam I'm Mr Abram lepatla kopotja from tjate village I form part of hackney farm 116kt community .I have interest to be part of your public participation about Marula mine closing application.

I will attend with members of hackneye development committee we are twelve in numbers.But we are also very surprised to see this pappers of closing application but your company not contacting the committee is very wrong to do so.

My contact 0735764198 or Berry mohlala 07300302244

Regards

Sent from my Samsung Galaxy smartphone.

From: [Abram Lapatla](#)
To: [Caitlin Hird](#)
Subject: Marula (hackney farm116kt closing of prospecting rights public participation attendance)
Date: 03 May 2019 03:07:40 PM
Importance: High

Good afternoon sir tjate community the most affected community is worrying because they want to be part of the public participation and tjate tribal council expect them and send their acknowledge letter to the some email address. And please do not forget to address our concerns about the way you just posting the papers on our poles without informing the leaders because we were left out side of your process you were inviting poles not the people we are not sangomase or prophet to know that you were the right company and we have questions to ask.

Regards.

Sent from my Huawei Mobile

From: [Abram Lapatla](#)
To: [Caitlin Hird](#)
Subject: Re: Marula (hackney farm116kt closing of prospecting rights public participation attendance)
Date: 03 May 2019 03:22:30 PM

We waiting acknowledgement letter of tjate community, hackney development committee, tjate development committee, tjate development forum, tjate tribal council you can invite them on all letter they will received it on this email address abramlepatla@gmail.com worrying community leaders about hackney farm116kt.

Regards

On Fri, 03 May 2019, 15:07 Abram Lapatla, <abramlepatla@gmail.com> wrote:

Good afternoon sir tjate community the most affected community is worrying because they want to be part of the public participation and tjate tribal council expect them and send their acknowledge letter to the some email address. And please do not forget to address our concerns about the way you just posting the papers on our poles without informing the leaders because we were left out side of your process you were inviting poles not the people we are not sangomase or prophet to know that you were the right company and we have questions to ask.

Regards.

Sent from my Huawei Mobile

Record of telephone discussion

To: Kgoshi Mashabela **Tel No:** 071 586 3214

Company: Hackney Chief

From: Clive Phashe **At:** Fourways Office

Date: 26 April 2018 **Ref:** 710.09002.00016

Subject: Marula-Hackney-Driekop EA Process

The Chief of Hackney was called and informed about Marula Platinum Mine' application for the Prospecting Right in Hackney. The Chief advised that he had seen the Site Notices placed in the area and had referred the matter to his attorneys.



SLR Consulting (Africa) Proprietary Limited

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1 Macbeth Avenue, Fourways, 2191
Postal Address: PO Box 1596, Cramerview, 2060, South Africa



Reg. No: 1998/005179/07
Vat No: 4300145887

Directors: R Hounsome, N Penhall, P MacKellar, F van Heerden, S Dorman

Fourways Office: **Physical Address:** Unit 7 & 9, Fourways Manor Office Park, 1 Macbeth Avenue, Fourways
Postal Address: PO Box 1596, Cramerview, 2060 **T**+27 11 467 0945 **F**+27 11 467 0978

Cape Town Office: **Physical Address:** Unit 39, Roeland Square, 30 Drury Lane, Cape Town
Postal Address: PO Box 10145, Caledon Square, 7905 **T**+27 21 461 1118 **F**+27 21 461 1120

Somerset West Office: Unit D3, Building 5, Fairways Office Park, Niblick Way, Somerset West
T+27 21 851 3348

MARULA PLATINUM (PTY) LTD

THE CLOSURE OF THE HACKNEY PROSPECTING RIGHT, THE ADDITION OF THE DRIEKOP VENT SHAFT, AND THE ADDITION OF AN ABOVEGROUND FAN AT THE APPROVED CLAPHAMN VENT SHAFT

INTERESTED AND AFFECTED PARTY DATABASE

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TABLE 1: PROJECT TEAM AND ENVIRONMENTAL ASSESSMENT TEAM

Interest group	Title	Name	Surname	Organisation	Interest
Marula Platinum (Pty) Ltd	Mr	Phumlani	Dlamini	Impala Platinum (Pty) Ltd	Stakeholder Management
	Ms	Murendeni	Makhado		
	Mr	Kwena	Mathopa		
	Ms	Tlaishego	Maile		
	Mr	Isiah	Maile		
Environmental consultants	Ms	Caitlin	Hird	Metago part of the SLR Group (Pty) Ltd	Project Manager
	Mr	Clive	Phashe		Project Assistant
	Ms	Alex	Pheiffer		Project Reviewer
	Ms	Hanlie	Liebenberg-Enslin	Airshed Planning Professionals (Pty) Ltd	Air Quality Specialist
Contact details of public review venues					
	Ms	Sheila	Dinkwanyane	Greater Tubatse Municipal Library	

TABLE 2: LANDOWNERS, LAND USERS AND LAWFUL OCCUPIERS IN AND SURROUNDING THE PROJECT AREA

Title	Name	Surname	Organisation	Interest
IN THE PROJECT AREA				
HACKNEY				
Mr	Kgoshi	Mashabela	Hackney Development Committee	Hackney Farm
Mr	Headman Motubatsi	Mashabela		
Mr	Abram	Lepatla		
Mr	Berry	Mohlala		
Ms	Gladys	M		
Ms	Ivy	Lekwady		
	L	Hlongwane		
	M.J.	Mashabela		
	M.	Mabokoane		
	P.D.	Mokoala		
	W.	Masona		
	Z.M.	Mashabela		
	G.S.	Nkgabane		
	M.	Riba		
	S.	Mampa		
	Aubrey	Thobejane		
WINNAARSHOEK				
Mr	Kgoshi Mafete Bethuel	Mohlala		Winnarshoek Farm
Mr	Barclays	Thobejane	Tswako Mohlala Traditional Council	
Mr	Esrom	Phoku	Seuwe Community Development Forum	
DRIEKOP				
Mr	Kgoshi Masiya William	Mohlala	Babina Kgomo Ba Mohlala Traditional Council	Driekop Farm
Mr	Esrom	Phoku	Driekop Community Development Forum (Chairperson)	
	Steve	Nkwana	Moshate	
	Elias	Motene	Moshate	

Title	Name	Surname	Organisation	Interest
	Joseph	Mokwena	Moshate	
	Elmon	Mokofane	Moshate	
	Simon		Moshate	
	France	Kgwedi	Moshate	
Mr	Edwin	Doweoani	Department of Rural Development and Land Reform Limpopo Province (DRDLR): Chief Director: Land Resource	Landowner of Hackney 116KT (portion 0) – PR Closure Area
Mr	Steven	Seolwana		Landowner of Driekop 253 KT (portion 0) – Driekop Vent Shaft
Ms	Petunia	Ntlhane		Landowner of Winnaarshoek (portion 0) – Clapham Vent Shaft
SURROUNDING THE PROJECT AREA				
Mr	Edwin	Doweoani	Department of Rural Development and Land Reform Limpopo Province (DRDLR): Chief Director: Land Resource	Landowner of: Twickenham 114 KT (0) Surbiton 115 KT (0) Forest Hill 117 KT (0) (no info for ptns 1, 2) Clapham 118 KT (0) (no info for ptn 1) Twyfelaar 119 KT (0) (no info for ptn 1) Maandagshoek 282 KT (0) Garatouw 282 KT (0) De Kom 252 KT (0) Quartz Hill 542 KS (0)
	Steven	Seolwana		
	Petunia	Ntlhane		
	Pastor W	Schwär	Uniting Reformed Church in Southern Africa	Garatouw 282 KT (1)
	Khodoba	Khodoba	Evangelical Lutheran Church	Winaarshoek 250 KT (1)
			South African Development Trust (represented by DRDLR)	Dsjate 249 KT (0)
	Mpho/Given	Ngobeni		
ENGAGED DURING 2012 PPP				

Title	Name	Surname	Organisation	Interest
Mr	H W	Mashabela	Baroka Ba Mashabela Kgoshi/ Chief	Kgoshi/ Chief of Hackney 116KT
Ms	S John	Manyaka	Manyaka Community Representative	
Mr	Lucy M	Manyaka	Manyaka Traditional Council	Kgoshikgadi/ Chieftainness
Mr	Molamoso Solomon	Mashishi	Ga Mashishi	
Mr	Joseph Setshabi	Ngwato	Magabaneng Community Development Trust	
Mr	M E	Makofone	Diphele	
Mr	William Masiya	Mohlala	Driekop	Kgoshi/ Chief Mohlala Traditional Council
Mr	E T	Mohlala	Marula Community Development Agency (MCDA)	
Mr	S J	Tehele	Marula Community Development Agency (MCDA)	
Mr	Bethuel Mafete	Mohlala	Tswako Mohlala Traditional Council	Kgoshi/ Chief Tswako Mohlala Traditional council
Mr	M I	Manyaka	Manyaka Traditional Authorities	
	Tshidiso	Mohlala	Marula Community Development Agency (MCDA)	Chairperson
	I S	Kgwato	Magabaneng	
Mr	George	Mashabela	Marula Community Development Agency (MCDA): Roka	
	Bapolai	Mayanka	Marula Community Development Agency (MCDA): Ga-Manyaka	
Ms	Dorah Molefe	Chambane	Marula Community Development Agency (MCDA)Ga- Mashishi	
Mr	Lucky Manonyane	Malatjie	Marula Community Development Agency (MCDA): Driekop	
	M S	Mashishi	Marula Community Development Agency (MCDA)	
Ms	Mafoshe Debora	Maboe	Marula Community Development Agency (MCDA)	
	Salome Phokane	Mosoma	Marula Community Development Agency (MCDA)	
Mr	Elmond	Makofone	Marula Community Development Agency (MCDA): Driekop Diphele	
Ms	Rose	Mphethi	Marula Community Development Agency (MCDA): Ga- Kgoete	

Title	Name	Surname	Organisation	Interest
	Makwateng	Thankge	Marula Community Development Agency (MCDA): Ga-Kgoete	
Mr	Lawrence Boleu	Mashabela	Marula Community Development Agency (MCDA): Ga- Mashishi	
	Mogale	Mogale	Marula Community Development Agency (MCDA): Driekop	
Mr	Aubrey	Moropa	Marula Community Development Agency (MCDA): Driekop	
Ms	Reneilwe	Pholwana	Ward Councillor	Tubatse Local Municipality Ward 8
Mr	Maile Simon	Makofane	Ward Councillor	Tubatse Local Municipality Ward 10
	L.	Mothiba	Tswako Mohlala Traditional Offices	
			Tswako Mohlala Traditional Offices	
	Nkopodi	Kgolane		
	Marobom	Esrow	Tswako Mohlala Traditional Offices	
Mr			Tswako Mohlala Traditional Offices	
	Paul	Pholane		
Mr			Tswako Mohlala Traditional Offices	
	Phineas	Selahle		
	Wiliam	Ngwatle	Tswako Mohlala Traditional Offices	
			Tswako Mohlala Traditional Offices	
	Modipe	Nalakia		
Mr			Tswako Mohlala Traditional Offices	
	Johannes	Mohlaba		
Mr			Tswako Mohlala Traditional Offices	
	Josias	Mohlala		
Mr			Tswako Mohlala Traditional Offices	
	Petrus	Mabilo		
Mr			Tswako Mohlala Traditional Offices	
	Harry	Phoku		

Title	Name	Surname	Organisation	Interest
	J.	Ngwau	Tswako Mohlala Traditional Offices	
Mrs	Ivy	Mashilo	Tswako Mohlala Traditional Offices	
	Kgolane	Phokane	Tswako Mohlala Traditional Offices	
Mr	Petrus	Malepe	Tswako Mohlala Traditional Offices	
	Polies	Mohlala	Tswako Mohlala Traditional Offices	
Mr	Phineas	Modipi	Tswako Mohlala Traditional Offices	
Mr	Samoel	Maebela	Tswako Mohlala Traditional Offices	
	Setemere	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Frans	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
	Mankqoqo	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
	Kgoshi	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Piet	Nkopo	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Elias	Komana	Babina-Phuthi Ba Manyaka Traditional Offices	
	Babolai	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	

Title	Name	Surname	Organisation	Interest
Mr	Oliver	Nyobole	Babina-Phuthi Ba Manyaka Traditional Offices	
	Nqwana Maleka	Manyana	Babina-Phuthi Ba Manyaka Traditional Offices	
	Daena	Mamogale	Babina-Phuthi Ba Manyaka Traditional Offices	
Ms	Anna	Mosoma	Babina-Puathi Ba Manyaka Traditional Offices	
	Phaswane	Komana	Babina-Phuthi Ba Manyaka Traditional Offices	
	Salome	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mrs	Albertina	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
	Mgotins	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	B.D	Manyaka	Babina-Pheuhi Ba Manyaka Traditional Offices	
Mr	Judas	Manyaka	Babina-Pheuhi Ba Manyaka Traditional Offices	
Mr	John	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Israed	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Manamodi	Manyaka	Babina-Phuthi Ba Manyaka Traditional Offices	
Mr	Lucas	Mosoma	Babina-Phuthi Ba Manyaka Traditional Offices	

Title	Name	Surname	Organisation	Interest
Mr	Andries	Phori	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Jack	Selahle	Babina-Nare Ba Mohlala Traditional Offices	
Mr	William	Moshate	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Jack	Tau	Babina-Nare Ba Mohlala Traditional Offices	
Mr	John	Matshie	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Andries	Morema	Babina-Nare Ba Mohlala Traditional Offices	
	Sephorahi	Phoku	Babina-Nare Ba Mohlala Traditional Offices	
Mrs	Thandi	Mohubedu	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Marcus	Makofane	Babina-Nare Ba Mohlala Traditional Offices	
Mrs	Anna	Kgoete	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Alpheus	Mothiba	Babina-Nare Ba Mohlala Traditional Offices	
	Mohlala	Dreggs	Babina-Nare Ba Mohlala Traditional Offices	
Mr	Alpheus	Phala	Babina-Nare Ba Mohlala Traditional Offices	

TABLE 3: LAND DWELLERS/ OCCUPIERS (NON-LAND OWNERS) IN AND SURROUNDING THE PROJECT AREA

Title	Name	Surname	Interest	Designation
ENGAGED DURING 2012 PPP				
Mr	Mokoala	Mphage	Community member	
Mr		Tsietsi	Driekop community	
Ms	Dineo	Motubatse	Ga-Mashishi	

TABLE 4: OTHER IAPS – SURROUNDING INDUSTRY AND MINES, NON-GOVERNMENT ORGANISATIONS

Title	Name	Surname	Interest
Ms	Cate	Rapudi	Eskom
ENGAGED DURING 2012 PPP			
Mr	Shane	Laubscher	Samancor Chrome
Mr	Erich	Heymann	Anglo Platinum
Mr	David	Pino	Modikwa Platinum Mine
Mr	Collin	Bird	Jubilee Platinum
Mr	Johan	Meyer	
Mr	Jaco	Fick	Twickenham Platinum Mine

TABLE 5: REGULATORY AUTHORITIES LIST

Title	Name	Organisation
Mr	Thivhulawi Kolani	DMR Limpopo Sub-Directorate: Mine Environmental Management
Mr	Vusi Maluleke	Department of Economic Development, Environment and Tourism (LEDET): Head of EIA Central Administration
Mr	Adam Ramalisa	Department of Water Affairs Lydenburg Area
Mrs	Makhanana Senwana	Department of Rural Development and Land Reform
Mr	Matsobane Selemela	Department of Agriculture: Senior Manager: Natural Resources (Provincial)
Ms	Nowata MS	
Mr	M. Kgopa	Sekhukhune Area Manager
Mr	Jonathan Gafane	HOD: Roads and Public Transport Limpopo
Mr.	Thabiso Mokoena	Greater Tubatse Local Municipality – Head of Communications
Mr	C. Nchabeleng	Greater Sekhukhune District Municipality Planning and Economic Development
Mr	Fixon Hlongwane	Limpopo Parks and Tourism
Mr	Malan Du Toit	
Ms	Hanlie	
Mr	Donald Lithole	Limpopo Province - SAHRA
Ms.	Natasha Higgitt	SAHRA
Mr/	Andrew Salomon	

APPENDIX D: DETAILED ASSESSMENT OF POTENTIAL IMPACTS

Detailed assessment of potential impacts

Decommissioning and rehabilitation of each drill site was undertaken once drilling of each site was completed (as outlined in Section 3.2). This assessment therefore focusses on potential residual impacts/risks as a result of the rehabilitation phase only. Potential environmental and socio-economic residual impacts/risks have been identified by SLR. The sequence in which these issues are listed are in no order of priority or importance. The criteria used to rate each impact is outlined in Section 7.6.

The potential impacts/risks have been assessed against the prospecting right closure objective which is to return any areas disturbed by prospecting activities to the pre-project state. A summary of the impact assessment is provided in Section 9 of the main report. The assessment of the unmitigated scenario takes into account that decommissioning and rehabilitation activities have already been implemented in line with the management measures outlined in the approved prospecting EMPr. The mitigated scenario is where additional mitigation measures are deemed necessary.

ISSUE: LOSS OF FLORA AND FAUNA THROUGH LACK OF OR POOR REHABILITATION

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of flora and fauna at the drill site. This could cause a proliferation of alien invasive species and have edging effects on surrounding areas.

Assessment of impact

Vegetation and related habitat and faunal species in the lower lying areas have been influenced to varying degrees by on-going community activities including development of houses and community structures and livestock grazing. In the higher lying parts of the Leolo Mountains, the vegetation and related habitat and faunal species are expected to be better intact and would support a higher variety of species. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site) and took place within the lower lying areas and in close proximity to roads, houses and community activities (see Section 7.4). Rehabilitation activities have been undertaken at all drill sites, the sites cleared of any waste or contaminated soils and the soils prepared for re-vegetation. At the time of the 2013 EMP performance assessment, for two of the drill sites (completed in 2007), vegetation had successfully re-established. For the remaining three drill sites (completed in 2012), re-vegetation was in progress. Although it was not possible to visit these three drill sites at the time of the current assessment, the area has experienced average to above average rainfall since 2013 which would have assisted with the natural revegetation of the remaining drill sites. Ongoing community activities and use of the land would have potentially hampered this. In addition the presence of alien invasive species is possible. This however could not be verified by SLR.

The loss of flora and fauna through a lack of or poor rehabilitation is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation is possible due to Marula being denied access to the three remaining drill sites. It is recommended that as part of a DMR visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents as an annexure to this report.

TABLE: IMPACT/RISK SUMMARY – FLORA AND FAUNA

Issue: Loss of flora and fauna through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-

Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing community activities within the drill site areas would contribute to cumulative impacts on the flora and fauna.	
Degree to which impact can be reversed	Over-time and with adequate rainfall and controlled livestock grazing, any potential impacts could be reversed.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

ISSUE: LOSS OF PRE-PROSPECTING LAND USES THROUGH LACK OF OR POOR REHABILITATION

Description of impact

A lack of or poor rehabilitation at the drill sites would result in the loss of pre-prospecting land uses. This could affect the livelihoods of communities who rely on the land for subsistence purposes. In addition, this could result in on-going dust emissions from exposed areas which could cause a nuisance to surrounding land uses.

Assessment of impact

Land uses in the prospecting right area include residential with related support infrastructure, subsistence farming and livestock grazing. In the higher lying areas of the Leolo Mountains, the land use is wilderness. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site) and took place within the lower lying areas and in close proximity to roads, houses and community activities (see Section 7.4). No farming areas were disturbed by prospecting activities. Rehabilitation activities have been undertaken at all drill sites, the sites cleared of any waste or contaminated soils and the soils prepared for revegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification. As indicated above, at the time of the 2013 EMP performance assessment, for two of the drill sites (completed in 2007), vegetation had successfully re-established. For the remaining three drill sites (completed in 2012), re-vegetation was in progress. With the re-vegetation of the drill sites (partly or wholly), the pre-prospecting land uses on and surrounding the drill sites can continue. Where re-vegetation is still in progress, mis-management or overuse of the area could hamper long term use of the land and result in ongoing exposed areas. As it was not possible to visit these three drill sites at the time of the current assessment, this however could not be verified by SLR. The loss of pre-prospecting land uses through a lack of or poor rehabilitation is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation is possible due to Marula being denied access to the three remaining drill sites. It is recommended that as part of a DMR visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents as an annexure to this report.

TABLE: IMPACT/RISK SUMMARY – LAND USE

Issue: Loss of pre-prospecting land use through lack of or poor rehabilitation		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Low change or disturbance (L)	-
Duration	Short term (L)	-
Extent	A part of the site (VL)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	Ongoing community activities within the drill site areas would contribute to cumulative impacts on land uses.	
Degree to which impact can be reversed	With adequate rainfall and controlled livestock grazing, land uses could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Very Low	
Degree to which impact can be mitigated	Possible	
Residual impacts	None expected.	

ISSUE: CHANGE IN THE VISUAL LANDSCAPE OF THE AREA

Description of impact

A lack of or poor rehabilitation could alter the natural visual landscape and result in scaring.

Assessment of impact

The landscape is rural in nature and dominated by community structures and land uses (such as subsistence farming and livestock grazing) in the foreground and the higher lying areas of the Leolo Mountains in the background. Prospecting activities disturbed relatively small pieces of land (less than 0.04 ha per drill site) and took place within the lower lying areas and in close proximity to roads, houses and community activities (see Section 7.4). This has limited the potential change to and scaring of the landscape. Rehabilitation activities have been undertaken at all drill sites, the sites cleared of any waste or contaminated soils and the soils prepared for revegetation. At all drill sites, a standpipe and/or concrete beacon marks the location of the drilled borehole. This is to allow for easy identification. As indicated above, at the time of the 2013 EMP performance assessment, for two of the drill sites (completed in 2007), vegetation had successfully re-established. For the remaining three drill sites (completed in 2012), re-vegetation was in progress. With the revegetation of the drill sites, the visual landscape would return to a pre-prospecting state. During a drive through of the broader prospecting right area conducted in April 2019, prospecting drill sites were not obvious in the landscape and no visible scaring was noted. The change in the landscape is considered to be **INSIGNIFICANT** even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation is deemed necessary.

TABLE: IMPACT/RISK SUMMARY – VISUAL LANDSCAPE

Issue: Change in the visual landscape of the area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (L)	-
Duration	Very short term (VL)	-
Extent	A part of the site (VL)	-
Consequence	Very Low	-
Probability	Unlikely (VL)	-
Significance	Insignificant	-
Nature of cumulative impacts	Ongoing community activities within the drill site areas would contribute to cumulative impacts on landscape.	
Degree to which impact can be reversed	With adequate rainfall and controlled livestock grazing, the pre-prospecting landscape could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Not required.	
Residual impacts	None expected.	

ISSUE: NEGATIVE AND POSITIVE SOCIO-ECONOMIC IMPACTS

Description of impact

Closure of a prospecting right has the potential to result in both negative and positive socio-economic impacts. Where a third party applies for the mineral rights in the same area, related socio-economic impacts would occur.

Assessment of impact

Closure of the prospecting right would preclude Marula from undertaking further prospecting activities, which would result in a loss of income for the appointed contractor. It is however assumed that a contractor in the normal course of business would find alternative contracts to continue his business. Where a contractor made use of local communities, the temporary and short-term employment opportunities would no longer exist. As the nature of prospecting activities is to determine the presence of exploitable mineral resources and is not associated with generating revenue, social related benefits are not applicable. With Marula abandoning and exiting from the prospecting project, the mineral resource becomes available for third party applications. Marula has investigated opportunities to empower the local community and has proposed to the Hackney community that it applies for a preferential community right (in terms of Section 104 of the MPRDA). Accordingly, the Hackney community has expressed their interest and intent to apply over the said Hackney prospecting right area.

When considering the potential negative socio-economic impacts together with the opportunity that is created for third party applicants the overall impact is considered to be of **VERY LOW** significance even without mitigation (see table below).

Mitigation and monitoring

No additional mitigation is possible due to Marula being denied access to the area. It is recommended that as part of a DMR visit of the drill sites, any additional requirements for closure of the prospecting right are agreed and documents as an annexure to this report.

TABLE: IMPACT/RISK SUMMARY – SOCIO-ECONOMIC

Issue: Change in the visual landscape of the area		
Phases: Closure		
Criteria	Without Mitigation	With Mitigation
Intensity	Negligible change or disturbance (L)	-
Duration	Short term (L)	-
Extent	Affecting immediate neighbours (M)	-
Consequence	Low	-
Probability	Conceivable (L)	-
Significance	Very Low	-
Nature of cumulative impacts	No cumulative impacts expected.	
Degree to which impact can be reversed	With adequate rainfall and controlled livestock grazing, the pre-prospecting landscape could continue indefinitely.	
Degree to which impact may cause irreplaceable loss of resources	Not applicable.	
Degree to which impact can be mitigated	Possible.	
Residual impacts	None expected.	

Meeting between Marula and Hackney Development Representatives
held on 17 September 2018 at 09:00 at Marula Boardroom

Agenda

1. Opening
2. Introduction and Apologies
3. Abandonment of Hackney PR by Marula
4. Employment of 10 Hackney People
5. Closure

**MEETING BETWEEN MARULA AND HACKNEY DEVELOPMENT COMMITTEE
HELD ON THE 17 SEPTEMBER 2018 AT MARULA MINE.
MINUTES**

1. Opening

The meeting was officially opened by P Dlamini who requested one member from the Hackney Development Committee to open the meeting with a prayer.

The allowed Mr P Dlamini to chair and facilitate the meeting, which he did.

2. Introduction and Apologies.

Marula tendered an apology on behalf of Mr Isaiah Maile who was going to join the meeting later. HDC indicated that some of its members were also going to join the meeting a bit later.

Mr Malapane made a humble request to present in the meeting to be allowed to use his cell phone to record the proceedings of the meeting for future reference. The meeting allowed him to do so.

Mr Dlamini, gave the following updates on the issues that were discussed in the last meeting:

3. Abandonment of Hackney PR by Marula

P Dlamini stated that the rights underlying part of the farm Hackney 116 KT were acquired by Impala Platinum Limited (“Impala”) from Rustenburg Platinum Mines Ltd in terms of the provisions of the now repealed Mineral Act 50 of 1991 prior to the promulgation of the Mineral and Petroleum Resources Development Act 28 of 2002, as amended (“MPRDA”).

Impala applied for a prospecting right on part of the farm Hackney 116 KT in terms of the MPRDA which was granted and executed in 2006 for a period of 4 years. Impala subsequently ceded and transferred the said prospecting right to Marula Platinum (Pty) Ltd in terms of section 11 of the MPRDA and the consent to cede was acquired from the Minister of Mineral Resources (formerly “Minerals and Energy) and the deed of cession was finalised and signed by the Parties.

Marula was on several occasions denied access to the farm to conduct prospecting activities due to a number of demands from the affected communities through their representatives.

Marula’s inability to prospect coupled with the adverse economic situation currently facing the platinum industry (low metal price and rising cost), resulted in Implats and Marula Boards making a decision to the effect that Marula abandons/dispose of its Hackney PR to curb the costs.

Marula made a decision to give preference to the affected communities to lodge an application in terms of section 104 of the MPRDA if it so wishes. To this effect, Marula undertook to allow the affected communities to look for a strategic/technical partner of its own choice with whom they were going to prepare and lodge an application to DMR as per the provisions of the MPRDA. Marula met with several companies which were brought to the mine by some individual members of the

HDC. These meetings were information sharing sessions with companies who were showing interests in partnering with Hackney communities.

One meeting was held at DMR, in which DMR indicated that they will wait for an application and process same in terms of the MPRDA.

The meeting resolved that Marula provides HDC with a letter clearly stating its position on the Hackney PR including its original preference that the community be given a change to prepare and lodge an application with its own strategic partner. It was further resolved that Marula should only submit its application for closure once the said letter has been signed and provided to HDC.

The meeting to have the letter referred to above finalised and signed was scheduled for the 10 September 2018 at Marula.

4. Employment of 10 Hackney people

HDC indicated that Marula's HR undertook to recruit 10 people from the Hackney communities for employment at the mine. However, the 10 people were recruited and employed by the contractors and not by the mine as originally agreed.

Marula undertook to consult with its HR officials and revert with its position in the next meeting. The matter was therefore referred to the meeting of the 10 September 2018 for a feedback.

5. Closure

P Dlamini officially close the meeting at 11:20



ATTENDANCE REGISTER

Meeting between Marula Management and Hackney Development Representative

Date: 17 September 2018

Time: 09:00

Venue: Marula Boardroom

Name & Surname	Organization	Contact Number & Email address	Signature
L. Hlongwe	HELMUS	0749007386	
M.J. Mashabela	Maeteng	0795206238	
M. MABOKANE		0760 6863 30	
P.D Mokoala		072 7551988	
MIM MASOMI	-	0710524043	
E.M Mashabela		0731611920	
G.S. Nkomo	Meeting	0797076781	
M. Riba		0792832283	
BERRY M MASHALA	H.D.C	0730502244	
Samuel Mamp	H.D.C	0608419040	
Aubrey Mokoala	HDC	0799575123	

MEMORANDUM OF UNDERSTANDING (MEMORANDUM) BETWEEN MARULA PLATINUM (PTY) LTD (MARULA) AND KGOSI MASHABELA AND COMMUNITY LEADERS REPRESENTING DJATE AND MODIMOLLE COMMUNITY RESIDING ON FARM HACKNEY 116 KT (THE COMMUNITY) DATED 18 APRIL 2012.

With reference to the above, numerous meetings between the parties herein more specifically that of 5 September 2018 as well as the attached memorandum of agreement regulating the relationship between the parties mentioned therein.

It is recorded that Marula has advised the community of its intention to dis-venture the prospecting right held under Department Mineral Resources (DMR) reference LP30/5/1/1/2/210 PR on the farm Hackney 116 KT

It further recorded that the community has expressed its interest in lodging an application in term of section 104 of the Minerals and Petroleum Resources Development Act, Act 28 of 2002 as amended (MPRDA) in respect of the Farm Hackney 116 KT and as such the parties agree that Marula may proceed to abandon the said Prospecting right and soonest thereafter advise community of the of the abandonment.

Marula intends to proceed with the abandonment on or about 15th September 2018 but no later than 10 October 2018.

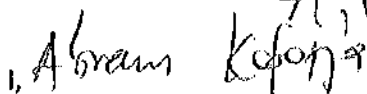
You are therefore urged to act with speed in respect of your intentions with regards on the said property.

We trust that you find the above in order.

Kind regards;



Phumlani Dlamini



on behalf of Hackney Development Committee acknowledge receipt of this letter on this...date of September 2018.

Marula Platinum (Pty) Limited

Reg. No. 1990/004775/07

PO Box 1496 • Steelpoort 1133 • Limpopo • South Africa
Tel: +27 13 214 6000 • Fax: +27 13 214 6021 • www.implats.co.za

Directors: J Theron (Chairman) • R Karstel • LD Mafahla
M Mashilane • PS Mokgotho • GS Potgieter†

Secretary: Impala Platinum Limited

Reg. No. 1952/071942/06

†MHSA 2A.(1)

From: [Dumisani Qina](#)
To: tjatedevelopmentfoundation@yahoo.com
Cc: [Phumlani Dlamini](#)
Subject: NOTICE OF ABONDONMENT AND WITHDRAWAL OF RENEWAL APPLICATION OF PROSPECTING RIGHT
-210PR
Attachments: [image001.jpg](#)
[20181008133603685.pdf](#)

Good day Sir;

As requested;

Please find attached hereto confirmation that Marula has withdrawn its prospecting right application in respect of farm Hackney.

Kind regards;

Dumisani Qina

Mining Rights Advisor



Impala Platinum

No 2 Fricker Road, Illovo ,Johannesburg, 2196
Private Bag X18, Northlands, 2116
South Africa

Tel: +27 11 731 9075

Fax: +27 11 731 9276

Mobile: +27 83 457 5456

E-mail: dumisani.qina@implats.co.za

Web: www.implats.co.za

Legal Services
Dumisani Qina
Mining Rights Advisor

Tel: +27 11 731-9075
Fax: +27 11 731-9276
E-mail: dumisani.qina@implats.co.za

1 October 2018

BY EMAIL: Aaron.Kharivhe@dmr.gov.za
Ntando.Dlamini@dmr.gov.za

Your Ref: LP 30/5/1/2/2/210 PR

Department of Mineral Resources
Limpopo Region
101 Dorp Street
Polokwane

Att: Mr Aaron Kharivhe
The Regional Manager

cc. Mrs Ntando Dlamini

Dear Sir

**NOTICE OF ABANDONMENT AND WITHDRAWAL OF RENEWAL APPLICATION:
PROSPECTING RIGHT MTP NUMBER 420/2006 PR (DMR REF NO LP 30/5/1/1/2/210 PR) –
HELD UNDER NOTARIAL DEED OF CESSION MPT NUMBER 50/2006 PR
BY MARULA PLATINUM (PTY) LTD**

We refer to the above mentioned Prospecting Right as well as the subsequent Renewal Application thereto lodged in terms of Section 18 the Mineral and Petroleum Resources Development Act 2002 (MPRDA) on 10 August 2010 by Marula Platinum (Pty) 399 (Pty) Ltd annexed hereto marked "Annexure A" for your ease of reference.

On the back of a strategic review of all pending applications the Board of Marula has resolved to withdraw from this prospecting right, and as such, further processing of the renewal application is no longer required.

Marula Platinum (Pty) Limited
Reg. No. 1990/004775/07
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Secretary: Impala Platinum Limited
Reg. No. 1952/071942/06
†MHS A 2A.(1)

Ref: LEG-13738

Marula further wishes to advise that it abandons this right and will proceed accordingly with the necessary closure application as required by the relevant legislative provisions.

Should you require any clarification or further information on the above, kindly contact the writer hereof at Impala Platinum Ltd, Dumisani.Qina@implats.co.za tel no 011 731-9075.

Yours faithfully



Dumisani Qina
Mining Rights Advisor

Cc:

Carina Engelbrecht
Corporate Lawyer
Impala Platinum Limited
Email: carina.engelbrecht@implats.co.za

Phumlani Dlamini
Stakeholder Engagement & Communications Manager
Marula Platinum (Pty) Ltd
Email: Phumlani.Dlamini@implats.co.za

Mogale Mashilane
General Manager
Marula Platinum (Pty) Ltd
Email: Mogale.Mashilane@implats.co.za

Theo Pegram
Consultant - Mineral Resource Management
Impala Platinum Limited
Email: Theo.Pegram@implats.co.za

PART C: CONTACT AND CORRESPONDENCE ADDRESS FOR THIS APPLICATION

Surname of contact person: D L A M I N I
 Forename(s) of contact person: P H U M L A N I I N N O C E N T
 Branch/Division: L E G A L D I V I S I O N
 Postal address: P R I V A T E B A G X 1 8
 N O R T H L A N D S
 Suburb:
 District:
 City: J O H A N N E S B U R G
 Province: G A U T I E N G
 Country: S O U T H A F R I C A
 Postal code: 2 1 1 6
 Telephone no.: 0 9 9 e 7 3 1 9 0 0 0
 Fax no.: 0 9 9 e 7 3 1 9 2 7 6
 Cellphone no.: 0 8 2 4 4 0 2 7 7 2
 E-mail address: p h u m l a n i - d l a m i n i @ i m p l a t t . c o . z a

Relevant physical address:

Building name:
 Building number: 2
 Street number:
 Street name 1: F R I C K E R
 Street name 2: (corner of)
 Type e.g Street, Avenue, Close etc. R O A D
 Suburb: I L L O V O
 Town/City: J O H A N N E S B U R G
 District:
 Province: G A U T I E N G
 Country: S O U T H A F R I C A

PART D: DESCRIPTION OF LAND OR AREA

Provide the registered description of the land or area to which this application relates, together with respective SG diagrams.

Farm name 1: H A C K N E Y
 Farm number and registration division: 1 1 6 K T
 Magisterial district: S E K H U K H U N E
 Farm subdivision name: A P O R T I O N
 Farm subdivision number:
 SG 21-digil code (if known):
 Offshore area (if applicable):

If more than one farm portion is indicated, please attach additional information in the same format.

If the prospecting area is greater or less than a farm portion, please supply the co-ordinates of the corner points of the area/s in degrees, minutes and seconds or decimal degrees or LoX and LoY or indicate on Topocadastral map(s). In the case of applications based on Topocadastral maps, the applicant must seek assistance from the Enquiry desk at the relevant Regional office. With reference to co-ordinates, provide in decimal degrees.

If possible, please provide the co-ordinates in a digital format e.g. ASCII* file (longitude, -latitude). When co-ordinates is provided in ASCII format, the LO, spheroid and datum information must still be completed on this form.

If the application is for a whole farm portion/s there is no need to provide co-ordinates.

* An ASCII (American Standard Code for Information Interchange) file is any form of text file that can be interchanged between different users and interpreted through any software.

1. Longitude or LoY																				E
Latitude or LoX	-																			S
2. Longitude or LoY																				E
Latitude or LoX	-																			S
3. Longitude or LoY																				E
Latitude or LoX	-																			S
4. Longitude or LoY																				E
Latitude or LoX	-																			S
5. Longitude or LoY																				E
Latitude or LoX	-																			S

SEE THE ATTACHED MAP WITH CO-ORDINATES

If more than 5 sets of co-ordinates, please attach additional information in the same format.

Each polygon must close, so the last co-ordinate must be the same as the first co-ordinate.

If the co-ordinates are supplied in LO, please give (a) the central meridian; and (b) the projection.

ASCII file handed in? Yes No

Spheroid and Datum:
 Clarke 1880/Cape WGS84/WGS84 WGS84/Hartebeesthoek

PART E: TYPE OF MINERAL OR MINERALS

Name the type of mineral or minerals for which the renewal of the prospecting right is required (refer to the attached List 2):

Code	Mineral	Type
Au	GOLD ORE	GS
Ni	NICKEL ORE	B
Ag	SILVER ORE	GS
Co	COBALT ORE	B
Cr	CHROME ORE	B
Cu	COPPER ORE	B
Spy	SULPHUR (IN PYRITE)	I
PGM	PLATINUM GROUP METALS	PGM

Method(s) of prospecting:
 INVASIVE ACTIVITIES
 DRILLINGS

Period for which renewal is required:
 3 YEARS

Name of the prospecting operation (if applicable):

N/A

Reason(s) why renewal is required:

TO CARRY OUT MORE DRILLINGS TO PROVE THE CONTINUATION OF THE MERENSKY & UG 2 REEFS, AS WELL AS AS THE MIDDLE AND LOWER GROUP CHROMITITE LAYERS INTO THE PROSPECTING AREA. IT IS ENVISAGED THAT 10 VERTICAL CORE RECOVERING BORE HOLES, WITH 3 DEFLECTIONS OVER THE MERENSKY & UG 2 REEFS WILL BE DRILLED, SAMPLED AND ASSAYED.

PART F: DECLARATION

I, the applicant

P H U M L A N I D L A M I N I

in my personal capacity or duly authorised thereto by the legal entity in a representative capacity, declare that the information contained in the application form is true and correct.

(attach certified copy of resolution, if acting in a representative capacity)

Capacity:

REPRESENTATIVE

THE APPLICATION MUST BE ACCOMPANIED BY THE FOLLOWING:

- A. Details of the land or area
Provide a plan as contemplated in regulation 2(2).
- B. Prospecting work programme
Detailed prospecting work programme for the renewal period.
- C. A detailed report regarding the results and interpretation of completed prospecting activities and prospecting expenditures incurred.
- D. A report reflecting the extent of the environmental rehabilitation conducted and completed in terms of the approved Environmental Management Plan, as well as rehabilitation to be completed and the estimated costs thereof.
- E. Prescribed fee
An amount of R 500, being the application fee specified in regulation 75(1)(b).
- F. Copy of identity document
In the case of a natural person, a certified copy of the identity document must be attached.
- G. A certified copy of the certificate of Incorporation, if applicable.
- H. A certified copy of the certificate to commence business, if applicable.
- I. Copy of resolution, if acting in a representative capacity (refer to Part F: Declaration)

Signed at

JOHANNESBURG

(Place)

on the

10

day of

AUGUST

(Month)

2010

(Year)

JPB

SIGNATURE OF APPLICANT / REPRESENTATIVE (IF APPLICABLE)

ADDRESS LIST: REGIONAL OFFICES OF THE DEPARTMENT OF MINERALS AND ENERGY

REGIONAL OFFICE	POSTAL ADDRESS	PHYSICAL ADDRESS	TELEPHONE NUMBER	FAX NUMBER
Eastern Cape Region Regional Manager	Private Bag X6076 PORT ELIZABETH 6000	Auto & General Towers 190 Govan Mbeki Avenue PORT ELIZABETH	27(41) 5853862	27(41) 5853881
Free State Region Regional Manager	Private Bag X33 WELKOM 9460	Bank of Lisbon Building Cnr Ryk & De Kaap Street WELKOM	27(57) 3528235	27(57) 3571241
Gauteng Region Regional Manager	Private Bag X5 BRAAMFONTEIN 2017	LUCS Building Cnr Smith & Rissik Street BRAAMFONTEIN	27(11) 3589700	27(11) 3392423
KwaZulu-Natal Region Regional Manager	Private Bag 2014 DUNDEE 3000	Phalana Building 26 Beacon Field DUNDEE	27(34) 2122111	27(34) 2122721
Limpopo Region Regional Manager	Private Bag X9467 POLOKWANE 0700	DME Building 101 Dorp Street POLOKWANE	27(15) 2874700	27(15) 2874729
Mpumalanga Region Regional Manager	Private Bag X7279 WITBANK 1035	Province Building Cnr Paul Kruger & Botha Avenue WITBANK	27(13) 6561448	27(13) 6903288
Northern Cape Region Regional Manager	Private Bag X6093 KIMBERLEY 8300	Standard Bank Building 43 Chapel Street KIMBERLEY	27(53) 8300800	27(53) 8325631
North-West Region Regional Manager	Private Bag A1 KLERKSDORP 2570	Senwes Building 1 Charl De Klerk Street KLERKSDORP	27(18) 4641631	27(18) 4629036
Western Cape Region Regional Manager	Private Bag X9 ROGGEBAAL 8012	Customs House Lower Heerengracht Road FORESHORE	27(21) 4196105	27(21) 4196260

TYPE OF MINERAL OR MINERALS APPLIED FOR

LIST 2

Code	Commodity	Type code	Type Description
RM	AGGREGATE	I	Industrial minerals
GA	AGATE (GEMSTONE)	GS	Gemstones (except diamonds)
All	All minerals	UN	Unspecified minerals
Al	ALUMINIUM ORE	B	Ferrous & base metals
GAz	AMAZONITE (GEMSTONE)	GS	Gemstones (except diamonds)
GAt	AMETHYST (GEMSTONE)	GS	Gemstones (except diamonds)
AA	AMOSITE (ASBESTOS)	A	Asbestos
An	ANDALUSITE	I	Industrial minerals
AP	ANTHOPHYLLITE (ASBESTOS)	A	Asbestos
Sb	ANTIMONY ORE	B	Ferrous & base metals
GAp	APATITE (GEMSTONE)	GS	Gemstones (except diamonds)
GPp	APOPHYLLITE (GEMSTONE)	GS	Gemstones (except diamonds)
GAq	AQUAMARINE (GEMSTONE)	GS	Gemstones (except diamonds)
A	ASBESTOS (GENERAL)	A	Asbestos
CA	ATTAPULGITE/SEPIOLITE (CLAY)	Cy	Clay
CL	BALL CLAY	Cy	Clay
Ba	BARYTES	I	Industrial minerals
CB	BENTONITE (CLAY)	Cy	Clay
GB	BERYL (GEMSTONE)	GS	Gemstones (except diamonds)
Be	BERYLLIUM ORE	B	Ferrous & base metals
Bi	BISMUTH ORE	B	Ferrous & base metals
QO	CONCRETE SAND (SILICA)	Q	Silica (general)
QB	BUILDING SAND (SILICA)	Q	Silica (general)
Cc	CALCITE	I	Industrial minerals
GCh	CHALCEDONY (GEMSTONE)	GS	Gemstones (except diamonds)
Cr	CHROME ORE	B	Ferrous & base metals
Gcb	CHRYSOBERYL (GEMSTONE)	GS	Gemstones (except diamonds)
AC	CHRYSOTILE (ASBESTOS)	A	Asbestos
Gci	CITRINE (GEMSTONE)	GS	Gemstones (except diamonds)
Cy	CLAY (GENERAL)	Cy	Clay
C	COAL	C	Coal
Co	COBALT	B	Ferrous & base metals
Cu	COPPER ORE	B	Ferrous & base metals
Cm	CORUNDUM	I	Industrial minerals
GCm	CORUNDUM (GEMSTONE)	GS	Gemstones (except diamonds)
AK	CROCODOLITE (ASBESTOS)	A	Asbestos
QC	CRUSHER SAND (SILICA)	Q	Silica (general)
DIA	DIAMOND	D	Diamond
DA	DIAMOND (ALLUVIAL)	D	Diamond
D	DIAMOND (GENERAL)	D	Diamond
DK	DIAMOND (IN KIMBERLITE)	D	Diamond
M	DIMENSION STONE (GENERAL)	M	Dimension stone
Mi	DIORITE/SYENITE	M	Dimension stone
Do	DOLOMITE	I	Industrial minerals
DI	DOLOMITIC LIMESTONE	I	Industrial minerals
Gdu	DUMORTIERITE	GS	Gemstones (except diamonds)
QDt	DUMORTIERITE (GEMSTONE)	GS	Gemstones (except diamonds)
GEm	EMERALD (GEMSTONE)	GS	Gemstones (except diamonds)
GEp	EPIDOTE (GEMSTONE)	GS	Gemstones (except diamonds)
Fs	FELDSPAR	I	Industrial minerals
Gfs	FELDSPAR (GEMSTONE)	GS	Gemstones (except diamonds)
QL	FILLING SAND (SILICA)	Q	Silica (general)
F	FLUORSPAR	I	Industrial minerals
QF	FOUNDRY SAND (SILICA)	Q	Silica (general)

Code	Commodity	Type code	Type Description
CE	FULLER'S EARTH (CLAY)	Cy	Clay
MB	GABBRO/NORITE	M	Dimension stone
Gn	GARNET (ABRASIVE)	I	Industrial minerals
GGa	GARNET (GEMSTONE)	GS	Gemstones (except diamonds)
GC	GAS AND CONDENSATE	P	Petroleum & gas
GS	GEMSTONES EXCEPT DIAMONDS	GS	Gemstones (except diamonds)
Ge	GERMANIUM ORE	B	Ferrous & base metals
Gi	GIBBSITE	I	Industrial minerals
QG	GLASS SAND (SILICA)	Q	Silica (general)
Au	GOLD ORE	GS	Gemstones (except diamonds)
MA	GRANITE/SYENITE	M	Dimension stone
Gr	GRAPHITE	I	Industrial minerals
grav	Gravel	MIN	Minerals
Gy	GYPSUM	I	Industrial minerals
HM	HEAVY MINERALS (GENERAL)	HM	Heavy minerals
GHI	HELIODOR (GEMSTONE)	GS	Gemstones (except diamonds)
CI	ILLITE-MONTMORILLONITE GROUP (CLAY)	Cy	Clay
Fe	IRON ORE	B	Ferrous & base metals
GJd	JADE (GEMSTONE)	GS	Gemstones (except diamonds)
GJ	JASPER (GEMSTONE)	GS	Gemstones (except diamonds)
CK	KAOLIN (CLAY)	Cy	Clay
Ki	KIESELGUHR	I	Industrial minerals
Ky	KYANITE	I	Industrial minerals
GKy	KYANITE (GEMSTONE)	GS	Gemstones (except diamonds)
GL	LABRADORITE (GEMSTONE)	GS	Gemstones (except diamonds)
Pb	LEAD	B	Ferrous & base metals
Lx	LEUCOXENE (HEAVY MINERAL)	HM	Heavy minerals
L	LIGNITE	I	Industrial minerals
Ls	LIMESTONE	I	Industrial minerals
Li	LITHIUM ORE	B	Ferrous & base metals
Mg	MAGNESITE	I	Industrial minerals
GM	MALACHITE (GEMSTONE)	GS	Gemstones (except diamonds)
Mn	MANGANESE ORE	B	Ferrous & base metals
MM	MARBLE (DIMENSION STONE)	M	Dimension stone
Hg	MERCURY	B	Ferrous & base metals
QM	METALLURGICAL SILICA	Q	Silica (general)
Mc	MICA	I	Industrial minerals
O	MINERAL PIGMENT	I	Industrial minerals
Mo	MOLYBDENUM ORE	B	Ferrous & base metals
Mz	MONAZITE (HEAVY MINERAL)	HM	Heavy minerals
GMr	MORGANITE (GEMSTONE)	GS	Gemstones (except diamonds)
G	NATURAL GAS	P	Petroleum & gas
Ne	NEPHELINE	I	Industrial minerals
Ni	NICKEL ORE	B	Ferrous & base metals
Nb	NIObIUM (COLUMBIUM) ORE	B	Ferrous & base metals
NO3	NITRATE	I	Industrial minerals
CN	NONTRONITE/SAPONITE (CLAY)	Cy	Clay
Oil	OIL	P	Petroleum & gas
GOp	OPAL (GEMSTONE)	GS	Gemstones (except diamonds)
GOr	ORTHOCLASE (GEMSTONE)	GS	Gemstones (except diamonds)
Pe	PERLITE	I	Industrial minerals
Pm	PETROLEUM	P	Petroleum & gas
P	PHOSPHATE ORE	I	Industrial minerals
PGM	PLATINUM GROUP METALS	PGM	Platinum Group Minerals
GPn	PREHNITE (GEMSTONE)	GS	Gemstones (except diamonds)

Code	Commodity	Type code	Type Description
PR	PROSPECTING UNSPECIFIED MINERALS	UN	Unspecified minerals
Pc	PSEUDOCOAL	C	Coal
Py	PYRITE	B	Ferrous & base metals
Ph	PYROPHYLLITE	I	Industrial minerals
MU	PYROXENITE	M	Dimension stone
GQ	QUARTZ (GEMSTONE)	GS	Gemstones (except diamonds)
MQ	QUARTZITE/SANDSTONE (DIMENSION STONE)	M	Dimension stone
RE	RARE EARTHS	B	Ferrous & base metals
CF	REFRACTORY CLAY (FLINT)	Cy	Clay
CP	REFRACTORY CLAY (SEMI-FLINT AND PLASTIC)/FIRECLAY	Cy	Clay
GRq	ROSE QUARTZ (GEMSTONE)	GS	Gemstones (except diamonds)
GRb	RUBY (GEMSTONE)	GS	Gemstones (except diamonds)
Rt	RUTILE (HEAVY MINERAL)	HM	Heavy minerals
Na	SALT	I	Industrial minerals
QY	SAND (GENERAL)	I	Industrial minerals
QH	SAND (MANUFACTURED) - FROM HARDROCK	I	Industrial minerals
Qwd	SAND (MANUFACTURED) - FROM WASTE DUMP	I	Industrial minerals
GSa	SAPPHIRE (GEMSTONE)	GS	Gemstones (except diamonds)
Sp	SERPENTINE	I	Industrial minerals
CS	SHALE/BRICKCLAY	Cy	Clay
MS	SHALE/SLATE/JASPI/LITE/SCHIST (DIMENSION STONE)	M	Dimension stone
QS	SILCRETE (SILICA)	Q	Silica (general)
Q	SILICA SAND (GENERAL)	Q	Silica (general)
QD	SILICA SAND (SILICA)	Q	Silica (general)
Si	SILICON ORE	B	Ferrous & base metals
SI	SILLIMANITE	I	Industrial minerals
Ag	SILVER ORE	GS	Gemstones (except diamonds)
So	SODA	I	Industrial minerals
GSd	SODALITE (GEMSTONE)	GS	Gemstones (except diamonds)
GSp	SPINEL (GEMSTONE)	GS	Gemstones (except diamonds)
Stw	STONE AGGREGATE (FROM WASTE DUMP)	I	Industrial minerals
Sl	STONE AGGREGATE; GRAVEL	I	Industrial minerals
Sr	STRONTIUM	I	Industrial minerals
S	SULPHUR	I	Industrial minerals
Spy	SULPHUR (IN PYRITE)	I	Industrial minerals
T	TALC	I	Industrial minerals
Ta	TANTALUM/NIOBIUM ORE	B	Ferrous & base metals
GTg	TIGER'S-EYE (GEMSTONE)	GS	Gemstones (except diamonds)
Sn	TIN ORE	B	Ferrous & base metals
GT	TOPAZ (GEMSTONE)	GS	Gemstones (except diamonds)
To	TORBANITE/OIL SHALE	C	Coal
GTm	TOURMALINE (GEMSTONE)	GS	Gemstones (except diamonds)
MT	TRAVERTINE (DIMENSION STONE)	M	Dimension stone
AT	TREMOLITE (ASBESTOS)	A	Asbestos
W	TUNGSTEN ORE	B	Ferrous & base metals
U	URANIUM ORE	B	Ferrous & base metals
V	VANADIUM ORE	B	Ferrous & base metals
MV	VERDITE/BUDDSTONE (DIMENSION STONE)	M	Dimension stone
Vm	VERMICULITE	I	Industrial minerals
CV	VERMICULITE-CHLORITE GROUP (CLAY)	Cy	Clay
Wo	WOLLASTONITE	I	Industrial minerals
Zs	ZEOLITE	I	Industrial minerals
Zn	ZINC ORE	B	Ferrous & base metals
GZr	ZIRCON (GEMSTONE)	GS	Gemstones (except diamonds)
Zr	ZIRCONIUM ORE	B	Ferrous & base metals



Private Bag X 9467, Polokwane, 0700, Tel: 015-287 4700, Fax: 015-287 4729
101 Dorp Street, Polokwane, 0699

From: Directorate Mineral Regulation: Limpopo Region
Enquiries: Semenya Mamikie Ref: LP30/5/1/1/2/0210PR
e-mail: mamikie.semenya@dme.gov.za

Marula Platinum (Pty) Ltd
Private Bag X 18
Northlands
Gauteng
2116

Fax: 011 731 9276
Attention: Phumlani Innocent Dlamini

Sir

APPLICATION FOR A RENEWAL OF PROSPECTING RIGHT: MARULA PLATINUM (PTY) LTD, ON PORTION OF THE FARM HACKNEY 116 KT, IN THE MAGISTERIAL DISTRICT OF SEKHUKHUNE.

I refer to the abovementioned matter and I confirm that your application for renewal of a prospecting right of Gold Ore, Nickel Ore, Silver Ore, Cobalt, Chrome Ore, Copper Ore Sulphur (in pyrite) & Platinum Group Metals in terms of section 18 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) has been acknowledged and it will be processed further.

Please be informed that in terms of Section 18(5) of the MPRDA, a prospecting right in respect of which an application for renewal has been lodged shall, despite its stated expiry date, remain in force until such time as such application has been granted or refused.

It would therefore be advisable to continue with your payment of prospecting fees as per Section 76(1) (c) of the Regulations of the Act. For ease of reference a copy of the relevant section is attached.

Yours faithfully.....

Mudogwa R.E
REGIONAL MANAGER
LIMPOPO REGION: POLOKWANE
DATE: 22 SEPTEMBER 2010

From: [Abram Kopotja](#)
To: [Dumisani Qina](#)
Subject: Good work
Date: 01 March 2019 08:57:29 AM
Attachments: [image002.jpg](#)

CAUTION: External E-mail

We are really like to appreciate your understanding for assisting us at all the times please keep it up true lawyer work like that good luck.

Regards

----- Original message -----

From: Dumisani Qina <Dumisani.Qina@implats.co.za>
Sent: 2019/02/28 09:23:05
To: abramlepatla@gmail.com
Cc: Phumlani Dlamini <Phumlani.Dlamini@implats.co.za>
Subject: Notification of Divestiture and Abandonment of Hackney PR to Kgosi Mashabela and Community Leaders representing Djate and Modimolle Community - Hackney - LP 210 PR

Good day Sir;

Please find attached as requested.

Kind regards;

Dumisani Qina

Mining Rights Advisor



Impala Platinum

No 2 Fricker Road, Illovo ,Johannesburg, 2196
Private Bag X18, Northlands, 2116

South Africa

Tel: +27 11 731 9075

Fax: +27 11 731 9276

Mobile: +27 83 457 5456

E-mail: dumisani.qina@implats.co.za

Web: www.implats.co.za

From: Elrina Lategan

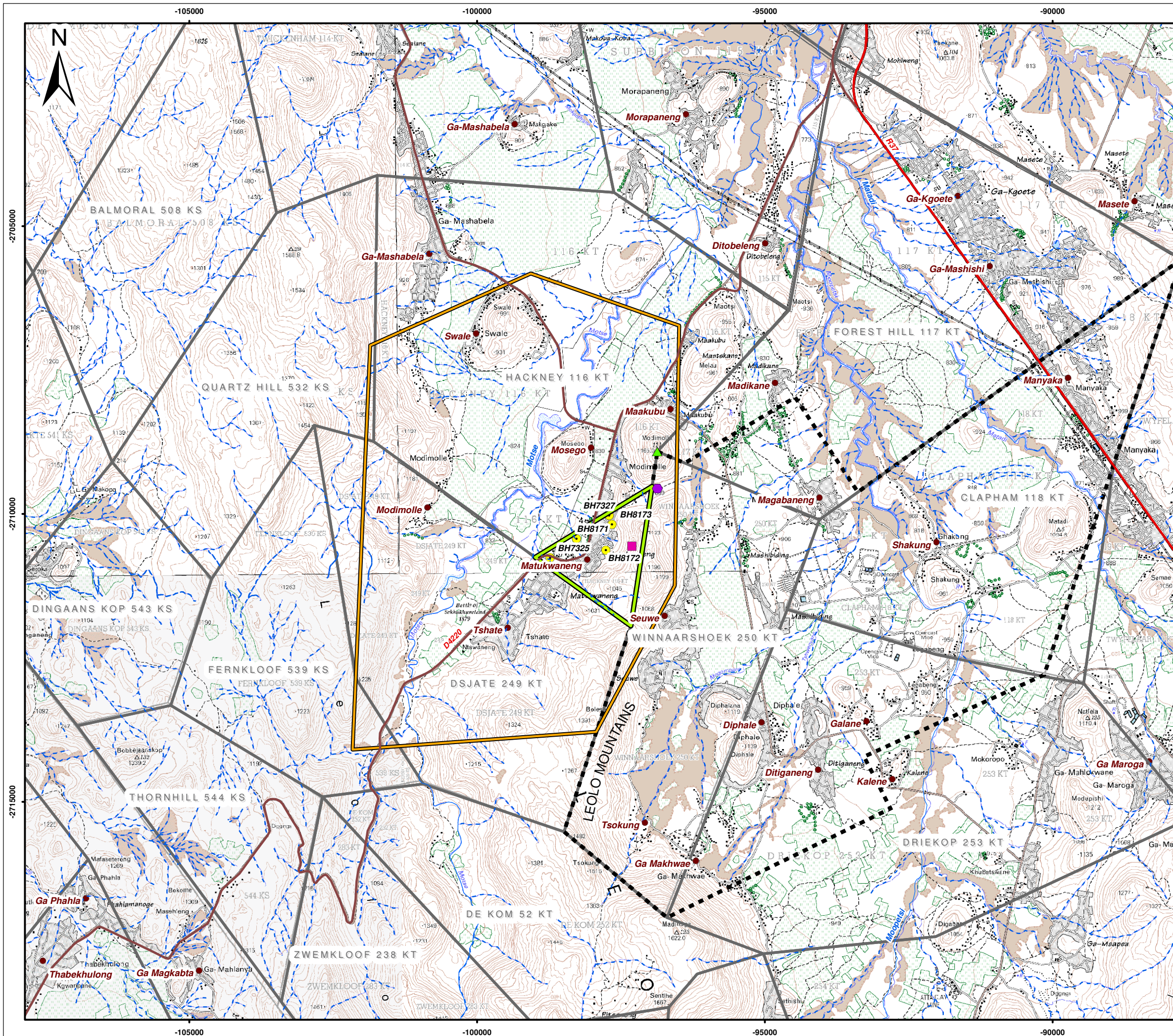
Sent: 28 February 2019 09:19 AM

To: Dumisani Qina <Dumisani.Qina@implats.co.za>

Subject: Notification of Divestiture and Abandonment of Hackney PR to Kgosi Mashabela and Community Leaders representing Djate and Modimolle Community - Hackney - LP 210 PR

This message is intended for the exclusive use of the named addressees hereof and may contain information that is privileged or confidential or otherwise restricted from disclosure. If you are not the named addressee, you are not authorised to read, use, transmit, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify me immediately by e-mail, discard any paper copies and delete all electronic files of the message.

APPENDIX E: COMPOSITE MAP



Legend

- Villages / Towns
- Main Roads
- Secondary Roads
- Perennial Rivers
- - - Non-Perennial Rivers
- ▭ Tsjate Provincial Heritage Site
- ▲ Modimolle Sacred Mountain
- Early Iron Age Site
- Sefateng Poort with Communal Grinding Stone and Isivavani
- Drill Sites
- ▭ Farms
- ▭ Hackney Prospecting Right Area
- - - Marula Mining Right Area
- Urban
- Cultivated
- Inland Water and Dams
- Thicket & bushland
- Dongas & Erosion Areas

0 500 1000 Meters

Scale: 1:65 000 @ A3
 Projection: Transverse Mercator
 Datum: WGS1984, Lo31

Marula Platinum Mine

Figure 6
Composite Map

SLR

SLR Consulting (Africa) (Pty) Ltd
 P O Box 1596, Cramerview, 2060, South Africa
 Tel: +27 (11) 467-0945 Fax: +27 (11) 467-0978

710.09002.00016 2019/05/10

APPENDIX F: DETAILED FINAL AUDIT PROCEDURE AND EMP COMMITMENTS

FINAL AUDIT PROCEDURE

AUDIT PROCEDURE		
Stage	Step	Detail
Pre-assessment	Clarify the assessment objectives and criteria	The assumed objectives and criteria are presented in the main body of the report.
	Define the scope of the assessment	<p>The client is: Marula Platinum (Pty) Ltd</p> <p>The “auditee” is: Hackney 116 KT Prospecting operations</p> <p>Assumed key performance areas are: environmental management as defined in Sections F and G of the standard environmental management plan (EMP) report.</p>

CORRESPONDING SCHEDULE	
Weeks	Activities
0	<p>Preparation</p> <ul style="list-style-type: none"> • Check and refine assessment objectives and criteria. • Make preliminary logistical arrangements for the meetings and drive-through.
1	<p>Review of relevant information</p> <ul style="list-style-type: none"> • Commence with review of relevant information.

AUDIT PROCEDURE		
Stage	Step	Detail
	Review available information	<p>The information listed below needs to be reviewed.</p> <ul style="list-style-type: none"> • EMP report • DMR letter of approval • Site layout • Specialist reports • Correspondence from the public • Monitoring records and reports • Other environmental approvals, if applicable

CORRESPONDING SCHEDULE	
Weeks	Activities
	<p>Pre-assessment meeting with relevant Managers</p> <ul style="list-style-type: none"> • Pre-assessment meeting with managers to confirm objectives and criteria and logistical arrangements. • Finalise assessment plan. <p>Orientation site visit (if possible)</p> <ul style="list-style-type: none"> • Brief orientation site visit for assessment team members. • Collect outstanding information for review. <p>Review of relevant information</p> <ul style="list-style-type: none"> • Continue review of relevant information.

AUDIT PROCEDURE		
Stage	Step	Detail
	Planning	Make logistical arrangements for the assessment.

CORRESPONDING SCHEDULE	
Weeks	Activities

AUDIT PROCEDURE		
Stage	Step	Detail
Assessment process at each operational unit	Opening meeting	<p>The purpose of the meeting is outlined below.</p> <ul style="list-style-type: none"> • Present the assessment aims, objectives and criteria to operations management. • Confirm logistical arrangements for the assessment.

CORRESPONDING SCHEDULE	
Weeks	Activities
1	<p>Assessment</p> <ul style="list-style-type: none"> • Opening meeting. • Collection of assessment evidence.

AUDIT PROCEDURE		
Stage	Step	Detail
	Collection of assessment evidence	This will involve interviews with staff members, verification of statements on site, review of available monitoring data and environmental management system documentation, review of most recent photographs taken in 2012/2013, review of historical google earth imagery to determine disturbance footprints and a drive-through the broader prospecting right area.
	Conclusions	The assessment conclusions will be directly linked to the assessment objectives.
	Closing meeting	The preliminary assessment findings and conclusions will be presented and discussed with operations management.
Reporting	First draft	Submit the draft report to operational unit for review and comment.
	Final report	Submit the final report to relevant Managers.

CORRESPONDING SCHEDULE	
Weeks	Activities
	<ul style="list-style-type: none"> • Processing of assessment evidence to draw assessment conclusions. • Preparation for the closing meeting. • Closing meeting. • Begin compilation of the assessment report. • Planning meeting with assessment team (to make arrangements for completion of the report).
2	<p>Reporting</p> <p>The final report will be submitted in June 2019.</p>

EMP COMMITMENTS

EMP COMMITMENTS
F 1 GENERAL REQUIREMENTS
F 1.1 MAPPING AND SETTING OUT
F 1.1.1 LAYOUT PLAN
A copy of the layout plan as provided for in Regulation 2.2 must be available at the prospecting/mining site for scrutiny when required. Plan must show co-ordinates of the area being applied for; north point; scale; name, number and location of the area covered by the application; size and shape of area; boundaries of area; layout of operations; surface structures and servitudes; and topography of the land.
The plan must be updated on a regular basis with regard to the actual progress of the establishment of surface infrastructure, mining operations and rehabilitation (a copy of the updated plan shall be forwarded to the Regional Manager on a regular basis).
A final layout plan must be submitted at closure of the mine or when operations have ceased.
F 1.1.2 DEMARCATING THE MINING/ PROSPECTING AREA
The mining/ prospecting area must be clearly demarcated by means of beacons at its corners, and along its boundaries if there is no visibility between the corner beacons.
Permanent beacons as indicated on the layout plan or as prescribed by the Regional Manager must be firmly erected and maintained in their correct position throughout the life of the operation.
Mining/ prospecting and resultant operations shall only take place within this demarcated area.
F 1.1.3 DEMARCATING THE RIVER CHANNEL AND RIVERINE ENVIRONMENT
The following is applicable if operations are conducted within the riverine environment (See F 3.2):

EMP COMMITMENTS
Beacons as indicated on the layout plan or as prescribed by the Regional Manager must be erected and maintained in their correct position throughout the life of the operation.
These beacons must be of a permanent nature during the operations and must not be easily removable, especially those in a river channel. The beacons must, however, be removed at the end of the operations.
The mining of and prospecting for any mineral shall only take place within this demarcated mining area.
If riverine vegetation is present in the form of reeds or wetland vegetation, the presence of these areas must be entered in Part C 1.45 of the EMPlan and indicated on the layout plan.
The holder of the mining permit/ prospecting right will also be required to permanently demarcate the areas as specified in F 1.1.2.
F 1.2 RESTRICTIONS ON MINING/ PROSPECTING
On assessment of the application, the Regional Manager may prohibit the conducting of mining or prospecting operations in vegetated areas or over portions of these areas
In the case of areas that are excluded from mining or prospecting, no operations shall be conducted within 5 m of these areas.
F 1.3 RESPONSIBILITY
The environment affected by the mining/ prospecting operations shall be rehabilitated by the holder, as far as is practicable, to its natural state or to a predetermined and agreed to standard or land use which conforms with the concept of sustainable development. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof.
It is the responsibility of the holder of the mining permit/ prospecting right to ensure that the manager on the site and the employees are capable of complying with all the statutory requirements which must be met in order to mine, which includes the implementation of this EMP.

EMP COMMITMENTS
If operations are to be conducted in an area that has already been disturbed, the holder must reach specific agreement with the Regional Manager concerning the responsibilities imposed upon himself/herself pertaining to the rehabilitation of the area and the pollution control measures to be implemented.
F 2 INFRASTRUCTURAL REQUIREMENTS
F 2.1 TOPSOIL
Topsoil shall be removed from all areas where physical disturbance of the surface will occur.
All available topsoil shall be removed after consultation with the Regional Manager prior to the commencement of any operations.
The topsoil removed, shall be stored in a bund wall on the high ground side of the mining/prospecting area outside the 1:50 flood level within the boundaries of the mining area/ prospecting.
Topsoil shall be kept separate from overburden and shall not be used for building or maintenance of access roads.
The topsoil stored in the bund wall shall be adequately protected from being blown away or being eroded.
F 2.2 ACCESS TO THE SITE
F 2.2.1 ESTABLISHING ACCESS ROADS ON THE SITE
The access road to the mining/prospecting area and the camp-site/site office must be established in consultation with the landowner/tenant and existing roads shall be used as far as practicable.

EMP COMMITMENTS

Should a portion of the access road be newly constructed the following must be adhered to:

The route shall be selected that a minimum number of bushes or trees are felled and existing fence lines shall be followed as far as possible.

Water courses and steep gradients shall be avoided as far as is practicable.

Adequate drainage and erosion protection in the form of cut-off berms or trenches shall be provided where necessary.

If imported material is used in the construction or upgrading of the access road this must be listed in C 2.17

The erection of gates in fence lines and the open or closed status of gates in new and existing positions shall be clarified in consultation with the landowner/tenant and maintained throughout the operational period.

No other routes will be used by vehicles or personnel for the purpose of gaining access to the site.

NOTE: The design, construction and location of access to provincial roads must be in accordance with the requirements laid down by the Provincial or controlling authority.

F 2.2.2 MAINTENANCE OF ACCESS ROADS

In the case of dual or multiple use of access roads by other users, arrangements for multiple responsibility must be made with the other users. If not, the maintenance of access roads will be the responsibility of the holder of the mining permit/ prospecting right.

Newly constructed access roads shall be adequately maintained so as to minimise dust, erosion or undue surface damage.

F 2.2.3 DUST CONTROL ON THE ACCESS AND HAUL ROADS

The liberation of dust into the surrounding environment shall be effectively controlled by the use of, inter alia, water spraying and/or other dust-allaying agents. The speed of haul trucks and other vehicles must be strictly controlled to avoid dangerous conditions, excessive dust or excessive deterioration of the road being used.

EMP COMMITMENTS
F 2.2.4 REHABILITATION OF ACCESS ROADS
Whenever a mining permit/ prospecting right is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit or right, any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner/tenant, shall be removed and/or rehabilitated to the satisfaction of the Regional Manager.
Any gate or fence erected by the holder which is not required by the landowner/tenant, shall be removed and the situation restored to the pre mining/ prospecting situation.
Roads shall be ripped or ploughed, and if necessary, appropriately fertilised (based on a soil analysis) to ensure the regrowth of vegetation. Imported road construction materials which may hamper regrowth of vegetation must be removed and disposed of in an approved manner prior to rehabilitation.
If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation, be corrected and the area be seeded with a seed mix to the Regional Manager's specification.
F 2.3 OFFICE/CAMP SITES
F 2.3.1 ESTABLISHING OFFICE / CAMP SITES
Office and camp sites shall be established, as far as is practicable, outside the flood plain, above the 1 in 50 flood level mark within the boundaries of the mining/ prospecting area.
The area chosen for these purposes shall be the minimum reasonably required and which will involve the least disturbance to vegetation. Topsoil shall be handled as described in F 2.1 above
No camp or office site shall be located closer than 100 metres from a stream, river, spring, dam or pan.
No trees or shrubs will be felled or damaged for the purpose of obtaining firewood, unless agreed to by the landowner/tenant.

EMP COMMITMENTS

Fires will only be allowed in facilities or equipment specially constructed for this purpose. If required by applicable legislation, a fire-break shall be cleared around the perimeter of the camp and office sites.

Lighting and noise disturbance or any other form of disturbance that may have an effect on the landowner/tenant/persons lawfully living in the vicinity shall be kept to a minimum.

F 2.3.2 TOILET FACILITIES, WASTE WATER AND REFUSE DISPOSAL

As a minimum requirement, the holder of a mining permit/ prospecting right shall, at least, provide pit latrines for employees and proper hygiene measures shall be established.

Chemical toilet facilities or other approved toilet facilities such as a septic drain shall preferably be used and sited on the camp site in such a way that they do not cause water or other pollution.

The use of existing facilities must take place in consultation with the landowner/tenant.

In cases where facilities are linked to existing sewerage structures, all necessary regulatory requirements concerning construction and maintenance should be adhered to.

All effluent water from the camp washing facility shall be disposed of in a properly constructed French drain, situated as far as possible, but not less than 200 metres, from any stream, river, pan, dam or borehole.

Only domestic type wash water shall be allowed to enter this drain and any effluents containing oil, grease or other industrial substances must be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognised facility.

Spills should be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.

EMP COMMITMENTS

Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., shall be stored in a container at a collecting point and collected on a regular basis and disposed of at a recognised disposal facility. Specific precautions shall be taken to prevent refuse from being dumped on or in the vicinity of the camp site.

Biodegradable refuse generated from the office/camp site, processing areas vehicle yard, storage area or any other area shall either be handled as indicated above or be buried in a pit excavated for that purpose and covered with layers of soil, incorporating a final 0,5 metre thick layer of topsoil (where practicable). Provision should be made for future subsidence of the covering.

F 2.3.3 REHABILITATION OF THE OFFICE/CAMP SITE

On completion of operations, all buildings, structures or objects on the camp/office site shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), which states:

(1) When a prospecting right, mining right, retention permit or mining permit lapses, is cancelled or is abandoned or when any prospecting or mining operation comes to an end, the holder of any such right or permit may not demolish or remove any building, structure, object -

(a) which may not be demolished in terms of any other law;

(b) which has been identified in writing by the Minister for purposes of this section; or

(c) which is to be retained in terms of an agreement between the holder and the owner or occupier of the land, which agreement has been approved by the Minister in writing.

(2) The provision of subsection (1) does not apply to bona fide mining equipment which may be removed.

Where office/camp sites have been rendered devoid of vegetation/grass or where soils have been compacted owing to traffic, the surface shall be scarified or ripped.

Areas containing French drains shall be compacted and covered with a final layer of topsoil to a height of 10cm above the surrounding ground surface.

EMP COMMITMENTS
The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.
If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation be corrected and the area be seeded with a vegetation seed mix to his or her specification.
Photographs of the camp and office sites, before and during the mining/ prospecting operation and after rehabilitation, shall be taken at selected fixed points and kept on record for the information of the Regional Manager.
F 2.4 VEHICLE MAINTENANCE YARD AND SECURED STORAGE AREAS
F 2.4.1 ESTABLISHING THE VEHICLE MAINTENANCE YARD AND SECURED STORAGE AREAS
The vehicle maintenance yard and secured storage area will be established as far as is practicable, outside the flood plain, above the 1 in 50 flood level mark within the boundaries of the mining/prospecting area.
The area chosen for these purposes shall be the minimum reasonably required and involve the least disturbance to tree and plant life. Topsoil shall be handled as described in F 2.1 above.
The storage area shall be securely fenced and all hazardous substances and stocks such as diesel, oils, detergents, etc., shall be stored therein. Drip pans, a thin concrete slab or a facility with PVC lining, shall be installed in such storage areas with a view to prevent soil and water pollution.
The location of both the vehicle maintenance yard and the storage areas are to be indicated on the layout plan.
No vehicle may be extensively repaired in any place other than in the maintenance yard.
F 2.4.2 MAINTENANCE OF VEHICLES AND EQUIPMENT
The maintenance of vehicles and equipment used for any purpose during the mining/prospecting operation will take place only in the maintenance yard area.

EMP COMMITMENTS

Equipment used in the mining/prospecting process must be adequately maintained so that during operations it does not spill oil, diesel, fuel, or hydraulic fluid.

Machinery or equipment used on the mining/prospecting area must not constitute a pollution hazard in respect of the above substances. The Regional Manager shall order such equipment to be repaired or withdrawn from use if he or she considers the equipment or machinery to be polluting and irreparable.

F 2.4.3 WASTE DISPOSAL

Suitable covered receptacles shall be available at all times and conveniently placed for the disposal of waste.

All used oils, grease or hydraulic fluids shall be placed therein and these receptacles will be removed from the site on a regular basis for disposal at a registered or licensed disposal facility.

All spills should be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.

On completion of mining/prospecting operations, the above areas shall be cleared of any contaminated soil, which must be dumped as referred to in section F 2.4.3 above.

All buildings, structures or objects on the vehicle maintenance yard and secured storage areas shall be dealt with in accordance with section 44 of the Mineral and Petroleum Resources Development Act, 2002.

The surface shall then be ripped or ploughed to a depth of at least 300mm and the topsoil previously stored adjacent the site, shall be spread evenly to its original depth over the whole area. The area shall then be fertilised if necessary (based on a soil analysis).

The site shall be seeded with a vegetation seed mix adapted to reflect the local indigenous flora.

EMP COMMITMENTS
If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation be corrected and the area be seeded with a seed mix to his or her specification.
F 3 GENERAL OPERATING PROCEDURES IN THE PROSPECTING AREA
F 3.1 LIMITATIONS ON MINING/PROSPECTING
The mining of or prospecting for precious stones shall take place only within the approved demarcated mining or prospecting area.
Mining/ prospecting may be limited to the areas indicated by the Regional Manager on assessment of the application.
The holder of the mining permit/ prospecting right shall ensure that operations take place only in the demarcated areas as described in section F 1.1.2 above.
Operations will not be conducted closer than one and a half times the height of the bank from the edge of the river channel and in such manner that the stability of the bank of the river is effected.
Precautions shall also be taken to ensure that the bank of the river is adequately protected from scouring or erosion. Damage to the bank of the river caused by the operations, shall be rehabilitated to a condition acceptable to the Regional Manager at the expense of the holder.
Restrictions on the disturbance of riverine vegetation in the form of reeds or wetland vegetation must be adhered to. The presence of these areas must be entered in Part of the programme and indicated on the layout plan.
F 3.2 MINING/ PROSPECTING OPERATIONS WITHIN THE RIVERINE ENVIRONMENT
<i>NOTE: The Department of Water Affairs and Forestry may impose additional conditions which must be attached to this EMP. In this regard, please see the Best Practice Guideline for small scale mining developed by DWAF (BPG 2.1) (available from http://www.dwaf.gov.za)</i>

EMP COMMITMENTS

The mining of or prospecting for precious stones in the river or the banks of the river will be undertaken only after the Regional Manager has consulted with the Department of Water Affairs and Forestry.

The canalisation of a river will not be undertaken unless the necessary permission has been obtained from the Department of Water Affairs and Forestry. Over and above the conditions imposed by the said Department, which conditions shall form part of this EMPlan, the following will also apply:

The canalisation of the flow of the river over different parts of the river bed shall be constructed in such a manner that the following are adhered to at all times:

The flow of the river may not be impeded in any way and damming upstream may not occur.

The canalisation of the flow may not result in scouring or erosion of the river-bank.

Well points or extraction pumps in use by other riparian users may not be interfered with and canalisation may not impede the extraction of water at these points.

Access to the riverbed for the purpose of conducting excavations in the river-bed, shall be through the use of only one access at a time. The location of the access to the river channel across the river-bank shall be at a point of the river-bank where the least excavation and damage to vegetation will occur and shall not be wider than is reasonably required. The position of the river access together with all planned future access points, must be indicated on the layout plan.

F 3.2.1 REHABILITATION OF ACCESS TO RIVER-BED

When rehabilitating the access point, the original profile of the river-bank will be re-established by backfilling the access point with the original material excavated or other suitable material.

The topsoil shall then be returned over the whole area to its original depth and if necessary fertilised and the vegetation allowed to grow.

EMP COMMITMENTS

If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation be corrected and the area be seeded with a seed mix to his or her specification.

In the event of damage from an occurrence where high flood waters scour and erode access points in the process of rehabilitation over the river-bank or an access point currently in use, repair of such damage shall be the sole responsibility of the holder of the mining permit or prospecting right.

Repair to the river-bank to reinstate its original profile to the satisfaction of the Regional Manager must take place immediately after such event has occurred and the river has subsided to a point where repairs can be undertaken.

Final acceptance of rehabilitated river access points will be awarded only after the vegetation has re-established to a point where the Regional Manager is satisfied that the river-bank is stable and that the measures installed are of durable nature and able to withstand high river-flow conditions.

F 3.2.2 REHABILITATION OF MINING/PROSPECTING AREA IN THE BED OF THE RIVER

The goal of rehabilitation with respect to the area where mining/prospecting has taken place in the river-bed is to leave the area level and even, and in a natural state containing no foreign debris or other materials and to ensure the hydrological integrity of the river by not attenuating or diverting any of the natural flow.

All scrap and other foreign materials will be removed from the bed of the river and disposed of as in the case of other refuse (see section F 2.3.2 above), whether these accrue directly from the mining/prospecting operation or are washed on to the site from upstream.

Removal of these materials shall be done on a continuous basis and not only at the start of rehabilitation.

Where reeds or other riverine vegetation have been removed from areas, these shall be re-established systematically in the approximate areas where they occurred before mining/prospecting.

EMP COMMITMENTS

An effective control programme for the eradication of invader species and other exotic plants, shall be instituted on a regular basis over the entire mining/prospecting area under the control of the holder of the mining permit/ prospecting right, both during mining/prospecting and at the stage of final rehabilitation.

THE WATER USE LICENCE

The National Water Act, (Act 36 of 1998), is based on the principles of sustainability, efficiency and equity, meaning that the protection of water resources must be balanced with their development and use.

In addition to being issued with a prospecting right or mining permit a small-scale miner may also need to get a water use licence for the proposed water uses that will take place, except in certain cases.

NOTE: The Department of Water Affairs and Forestry (DWAF) developed specific Best Practice Guideline for small scale mining that relates to stormwater management, erosion and sediment control and waste management. Copies of these guidelines can be obtained from the regional office of DME or DWAF.

Applications for a water use licence must be made in good time, such that approval can be granted before a water use activity can begin. The appropriate licence forms for each kind of expected water use should be completed together with supporting documentation. The main supporting document required is a technical report. To make the technical report easier, you can refer to sections in this EMPlan, as most of what the technical report requires has already been done in the EMPlan. If you refer to the EMPlan it must be attached to the technical report.

F 3.3 EXCAVATIONS

F 3.3.1 ESTABLISHING THE EXCAVATION AREAS

EMP COMMITMENTS

Whenever any excavation is undertaken for the purpose of locating and/or extracting ore bodies of all types of minerals, including precious stone-bearing gravels, the following operating procedures shall be adhered to:

Topsoil shall, in all cases (except when excavations are made in the river-bed), be handled as described in F 2.1 above.

Excavations shall take place only within the approved demarcated mining/prospecting area.

Overburden rocks and coarse material shall be placed concurrently in the excavations or stored adjacent to the excavation, if practicable, to be used as backfill material once the ore or gravel has been excavated.

Trenches shall be backfilled immediately if no ore or precious stone-bearing gravel can be located.

F 3.3.2 REHABILITATION OF EXCAVATION AREAS

The following operating procedures shall be adhered to:

The excavated area must serve as a final depositing area for the placement of tailings during processing.

Rocks and coarse material removed from the excavation must be dumped into the excavation simultaneously with the tailings.

Waste, as described in paragraph F 2.3.2 above, will not be permitted to be deposited in the excavations.

Once excavations have been refilled with overburden, rocks and coarse natural materials and profiled with acceptable contours and erosion control measures, the topsoil previously stored, shall be returned to its original depth over the area.

The area shall be fertilised if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local or adapted indigenous seed mix in order to propagate the locally or regionally occurring flora.

EMP COMMITMENTS
If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/ prospecting operation, be corrected and the area be seeded with a vegetation seed mix to his or her specification.
F 3.4 PROCESSING AREAS AND WASTE PILES (DUMPS)
F 3.4.1 ESTABLISHING PROCESSING AREAS AND WASTE PILES
Processing areas and waste piles shall not be established within 100 metres of the edge of any river channel or other water bodies.
Processing areas should be established, as far as practicable, near the edge of excavations to allow the waste, gravel and coarse material to be processed therein.
The areas chosen for this purpose shall be the minimum reasonably required and involve the least disturbance to vegetation.
Prior to development of these areas, the topsoil shall be removed and stored as described in paragraph F 2.1 above.
The location and dimensions of the areas are to be indicated on the layout plan and once established, the processing of ore containing precious stones shall be confined to these areas and no stockpiling or processing will be permitted on areas not correctly prepared.
Tailings from the extraction process must be so treated and/or deposited that it will in no way prevent or delay the rehabilitation process
F 3.4.2 REHABILITATION OF PROCESSING AREAS
Coarse natural material used for the construction of ramps must be removed and dumped into the excavations.
On completion of mining/prospecting operations, the surface of the processing areas especially if compacted due to hauling and dumping operations, shall be scarified to a depth of at least 300mm and graded to an even surface condition and the previously stored topsoil will be returned to its original depth over the area.

EMP COMMITMENTS
Prior to replacing the topsoil the material that was removed from the processing area will be replaced in the same order as it originally occurred.
The area shall then be fertilised if necessary to allow vegetation to establish rapidly. The site shall be seeded with a local, adapted indigenous seed mix.
If a reasonable assessment indicates that the re-establishment of vegetation is unacceptably slow, the Regional Manager may require that the soil be analysed and any deleterious effects on the soil arising from the mining/prospecting operation be corrected and the area be seeded with a seed mix to his or her specification.
F 3.5 TAILINGS DAM(S) (SLIMES DAM)
The permission of the Regional Manager must be obtained should a tailings dam be constructed for the purpose of handling the tailings of the mining/prospecting operations. The construction, care and maintenance of tailings dams have been regulated and the relevant regulation is copied herewith, both for your information and as a guideline to the commissioning, management, operation, closing and aftercare of a tailings deposition facility.
If applicable, see Regulation 73 of MPRDA for specific requirements.
F 3.6 FINAL REHABILITATION
All infrastructure, equipment, plant, temporary housing and other items used during the mining period will be removed from the site (section 44 of the MPRDA)
Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be permitted to be buried or burned on the site.
Final rehabilitation shall be completed within a period specified by the Regional Manager.
F.4 MONITORING AND REPORTING
F 4.1 INSPECTIONS AND MONITORING

EMP COMMITMENTS
Regular monitoring of all the environmental management measures and components shall be carried out by the holder of the prospecting right, mining permit or reconnaissance permission in order to ensure that the provisions of this programme are adhered to.
Ongoing 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 plant and animal life.
Visual inspections on erosion and physical pollution shall be carried out on a regular basis.
F 4.2 COMPLIANCE REPORTING / SUBMISSION OF INFORMATION
Layout plans will be updated on a regular basis and updated copies will be submitted on a biennial basis to the Regional Manager
Reports confirming compliance with various points identified in the environmental management programme 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.
F 5 CLOSURE
F 5.1 ENVIRONMENTAL RISK REPORT
When the holder of a prospecting right, mining permit or reconnaissance permission intends closing down his/her operations, an environmental risk report shall accompany the application for closure. The requirements of such a risk report is contained in Regulation 60 of the Regulations promulgated in terms of the Act.

EMP COMMITMENTS

F 5.2 CLOSURE OBJECTIVES

Closure objectives form part of this EMPlan and must-

- (a) identify the key objectives for mine closure to guide the project design, development and management of environmental objectives;
- (b) provide broad future land use objective(s) for the site; and
- (c) provide proposed closure cost.

F 5.3 CONTENTS OF CLOSURE PLAN

See EMP commitments for contents of closure plan

F 5.4 TRANSFER OF ENVIRONMENTAL LIABILITIES TO A COMPETENT PERSON

EMP COMMITMENTS

Should the holder of a prospecting right, mining permit or reconnaissance permission wish to transfer any environmental liabilities and responsibilities to another person or persons, the following will pertain:

- (1) An application to transfer environmental liabilities to a competent person in terms of section 48) of the Act, must be completed on Form O as set out in Annexure 1 to the Regulations and be lodged to the Minister for consideration.
- (2) The holder of a prospecting right, mining right or mining permit may transfer liabilities and responsibilities as identified in the environmental management plan and the required closure plan to a competent person as contemplated in Regulation 58.
- (3) When considering the transfer of environmental liabilities and responsibilities in terms of section 48) of the Act, the Minister must consult with any State department which administers any law relating to matters affecting the environment.
- (4) No transfer of environmental liabilities and responsibilities to a competent person may be made unless the Chief Inspector of Mines and the Department of Water Affairs and Forestry have confirmed in writing that the person to whom the liabilities and responsibilities is transferred to, have the necessary qualifications pertaining to health and safety and management of potential pollution of water resources.

F 5.5 NOTES ON LEGAL PROVISIONS

EMP COMMITMENTS

NOTE:

The holder of a prospecting right, mining permit or reconnaissance permission must also take cognisance of the provisions of other legislation dealing with matters relating to conservation, and which include, inter alia, the following:

- * National Monuments Act, 1969 (Act 28 of 1969).
- * National Parks Act, 1976 (Act 57 of 1976)
- * Environmental Conservation Act, 1989 (Act 73 of 1989)
- * National Environmental Management Act, 1998 (Act No. 107 of 1998)
- * Atmospheric Pollution Prevention Act, 1965 (Act 45 of 1965)
- * The National Water Act, 1998 (Act 36 of 1998)
- * Mine Safety and Health Act, 1996 (Act 29 of 1996)
- * The Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983).

SECTION G: SPECIFIC ADDITIONAL REQUIREMENTS DETERMINED BY THE REGIONAL MANAGER

No additional commitments were included in Section G of the SEMP.

CONDITIONS IN DMR APPROVAL LETTER

All prospecting activities must take place in accordance with the approved EMP.

No prospecting activities are allowed within 1:50 year flood line or 100m from the edge of the river whatever is the greatest, without the necessary authorisation from DWAF.

No prospecting infrastructure is allowed to be constructed within the 1:100 year flood line without the necessary authorisation from DWAF.

Impala Platinum Limited is responsible for all surface disturbances on the mining area, which includes all historical mining activities.

All available topsoil must be stripped and stockpiled separately prior to any surface disturbance.

All mine waste must be taken back to the excavation area for backfilling purposes.

No mine waste will be allowed to be deposited in natural drainage lines or erosion gullies.

No dumps structures must be left on the surface, this includes topsoil stockpiles, overburden stockpiles, waste rock stockpiles, tailings dumps and slimes dams.

All excavations must be backfilled to the natural surface level, if a bulk factor exists it must be accommodated on the total area of disturbance.

A surveyed plan must be submitted every year to the Regional Manager that indicates:

- The positions, footprints and volumes of all topsoil stockpiles, overburden dumps, waste rock dumps and slimes dams (any structure that is above the natural surface).
- The positions, surface areas and depths of all open pits.
- The positions, surface areas of all rehabilitated areas (please indicate the status of rehabilitation-backfilled, profiled/landscaped, topsoiled, vegetated or monitoring and managing).

The rehabilitation fund must be upgraded or revised on an annual basis according to the surveyed plan, which indicates the progress in rehabilitation.

Any project, expansions or additional infrastructure must be addressed through an addendum and submitted to the Regional Manager: Mineral Regulation for his approval before they commence. This approval may be amended at any stage if deemed necessary.

This approval does not purport to absolve your company from its common law obligations towards the surface rights holder or any other affected party.

The following Acts are applicable and relevant to the said approval and your company is to familiarise itself with its provision in so far as they apply to the company's operations:

- The National Water Act 1998 (Act 36 of 1998), with particular reference to the sections pertaining to mining or prospecting in the proximity of dams and their catchment areas, rivers, marshes, streams, pans and other water courses.
- The Environmental Conservation Act (Act 73 of 1989). Your attention is specifically directed to the requirements of section 20 of the above-mentioned Act.
- The Atmospheric Pollution Prevention Act, 1965 (Act 45 of 1965), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by mining activities, into the atmosphere.
- The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.
- The National Heritage Resources Act (Act No 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains.
- The Mine Health and Safety Act (Act 26 of 1996) in conjunction with the Minerals Act (Act 50 of 1991), with particular reference to those sections and regulations pertaining to health and safety at mines, mining within 100m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.
- The National Environmental Management Act (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.

All persons concerned must be made fully conversant with the terms of this approval, copies of which must be readily available to them.



RECORD OF REPORT DISTRIBUTION

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