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17 November 2015

Assmang (Pty) Ltd

24 Impala Road
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P O Box 782058
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ashley.mcleod@arm.co.za

FOR ATTENTION: MR. ASHLEY MCLEOD

PROPOSED DEVELOPMENTS FOR RHODES 2 SOLAR PARK, A RENEWABLE ENERGY GENERATION PROJECT ON THE FARM RHODES 269, IN THE JOE MOROLONG LOCAL MUNICIPALITY, JOHN TAOLO GAETSEWE DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE

Dear Mr McLeod,

We received comments from you on the Draft Scoping Report for the abovementioned project (Rhodes 2), on 10 November 2015, by e-mail.

These comments are substantial and your request to take these comments into consideration during the EIA phase of the application will be honored. Please note that your comments have been forwarded to the applicant and project manager and it will receive the attention required.

The specific queries and comments under section 7 of your letter might not be addressed adequately and to your satisfaction in the final scoping report. However, we will endeavor to address all these issues adequately in the EIA report, which will be submitted to you for your comments.

We will keep you up to date with all actions taken during the EIA process.

Best Regards,

.....
Ms.E Grobler
Environmental Assessment Practitioner
(egrobler@ages-group.com)



ASSMANG

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COMPANY SECRETARY:

AFRICAN RAINBOW MINERALS LIMITED

10 November 2015

Africa Geo-Environmental Engineering & Science (Pty) Ltd
Limpopo Office
120 Marshall Street
Polokwane
0699

For attention: Ms Engela Grobler

Per email: egrobler@ages-group.com

Dear Ms Grobler

**PROPOSED RENEWABLE ENERGY GENERATION PROJECT ON
THE FARM RHODES 269, KURUMAN RD, JOE MOROLONG
LOCAL MUNICIPALITY, JOHN TAOLO GAETSEWE DISTRICT
MUNICIPALITY, NORTHERN CAPE PROVINCE
SHORT NAME: RHODES 2 SOLAR PARK**

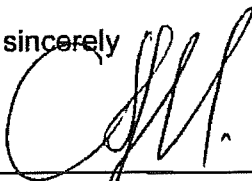
1. We refer to the above, as well as to the draft scoping report for the Rhodes 2 Solar Park ("Draft Scoping Report") which we received on 7 October 2015.
2. Assmang (Pty) Ltd ("Assmang") is the owner of the Farm Kipling No 271 Kuruman RD ("Farm Kipling"), Portion 1 of the Farm Gloria No 266 Kuruman RD ("Farm Gloria"), and the Remaining Extent of the Farm N'chwaning No 267 Kuruman RD ("Farm N'chwaning").
3. Assmang conducts mining operations on the Farm Gloria and on the Farm N'chwaning.
4. Assmang was registered as an interested and affected party on or about 6 October 2015.
5. We have been advised that we should submit our comments on or before 6 November 2015.

6. Please note that our comments listed below are not exhaustive and that we reserve the right to supplement our comments as set out herein below, should the need arise to do so.
7. Our comments on the Draft Scoping Report are as follows:
- 7.1 A company known as Kudumane Manganese Resources (Proprietary) Ltd ("KMR") is the holder of a prospecting right over the Farm Kipling. KMR have applied for a mining right on said property. Please confirm that you have consulted with KMR with regard to the proposed powerline and attendant servitude contemplated herein.
- 7.2 On page 3 and again on page 4 of the Draft Scoping Report it is stated that:
"...the site of Rhodes 2 Solar Park has been chosen by Palus Energy on the grounds of several considerations, in particular:
- *the high need for electricity supply to the area, due to the presence of several mines under operation and under construction, including the Hotazel Manganese, Kalagadi Manganese, Gloria and Assmang mines."*
- 7.3 We are of the opinion that, as there is no guarantee that our mines will be provided with electricity from the Rhodes 2 Solar Park, the presence of mines in the area cannot be used to justify the construction thereof.
- 7.4 The following statement appears on page 3 and again on page 4 of the Draft Scoping Report:
"Furthermore, being a renewable energy plant which does not generate CO2 emissions, it will help to compensate the CO2 emissions arising from these mining activities."
- 7.5 In this regard we request the following information:
- 7.5.1 Was a study conducted to measure the mines' Co2 emissions?
- 7.5.2 If so, please furnish us with a copy thereof.
- 7.5.3 If not, on what premise is this statement based?
- 7.5.4 Please explain how the Rhodes 2 Solar Park will compensate for the mines' emissions?
- 7.6 On page 4 it is stated that:
"The use of solar radiation for power generation is considered as a non-consumptive use and a renewable natural resource which does not produce greenhouse gas emissions."
- 7.7 We agree with the above, but require that the CO2 and greenhouse gas emissions for the Rhodes 2 Solar Park, including mining of raw materials, manufacturing and transport of the parts/components and the construction and operation of the plant, be calculated and form part of this study.
- 7.8 When assessing the maps (e.g. figure 1 contained in the Draft Scoping Report) it seems that the mines will be surrounded by solar parks. We request that the cumulative impact of these solar parks, specifically with regards to the impacts related to the sterilisation of mineral reserves due to reduced mining areas, buffer zones required in terms of the Mine

Health and Safety Act No 29 of 1966 ("MHSA"), servitudes, and all other related factors be assessed.

- 7.9 In paragraph 3.1.1 of the Draft Scoping Report a host of national government authorities are referred to. The Department of Water and Sanitation is not mentioned. Is there a specific reason for this?
- 7.10 Please indicate which other authorisations, in addition to an environmental authorisation, will be required for the Rhodes 2 Solar Park. Please note that Assmang must be registered and consulted as an interested and affected party during the application processes for these authorisations.
- 7.11 Please advise as to what the current zoning is of the land on which the Rhodes 2 Solar Park is to be constructed. Will the proponent have to apply for rezoning or land use change? If so, Assmang must be registered and consulted as an interested and affected party.
- 7.12 Are any water uses, as defined in the National Water Act No 36 of 1998, triggered? If so will a water use licence be required? If that is the case, Assmang must be registered and consulted as an interested and affected party.
- 7.13 Please provide Assmang with a detailed map showing impacts of power lines (including servitudes and MHSA impacts) on its abovementioned properties.
- 7.14 Please advise as to where water will be sourced from. Will a water use licence be required?
- 7.15 On page 15 water treatment facilities are mentioned. What will these be for – the treatment of water to drinking water standard, or for the treatment of polluted water?
8. We request that you give due consideration to the above-mentioned comments and concerns during the environmental impact assessment phase of this application.

Yours sincerely



A McLeod
ASSMANG PROPRIETARY LIMITED