

**APPENDIX E2: STAKEHOLDER ENGAGEMENT PLAN**

# ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT FOR THE MELMOTH IRON ORE MINE

## STAKEHOLDER ENGAGEMENT PLAN

### South and North Blocks

Prepared for: Jindal Iron Ore (Pty) Ltd.

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## CONTENTS

<b>1. INTRODUCTION .....</b>	<b>1</b>
<b>2. RECOMMENDATIONS FOR JINDAL IRON ORE.....</b>	<b>1</b>
2.1 Notice to recommence .....	1
2.2 Availability and Disclosure of Information .....	2
2.3 Community Liaison .....	2
2.4 Social Licence and Consent.....	3
<b>3. PUBLIC PARTICIPATION PROCESS FOR ESIA .....</b>	<b>4</b>
3.1 COVID precautions.....	4
3.2 Pre-application.....	4
3.2.1 DMRE Meeting.....	4
3.2.2 Stakeholder Identification.....	4
Key Stakeholders.....	5
Land Owner Identification.....	6
3.2.3 Notification and Dissemination of Information .....	6
Initial Engagements .....	6
Background Information Document.....	6
Notification letter .....	7
Door-to-door campaign.....	7
Newspaper Advertising .....	7
Site notices.....	8
Radio Notices (additional to the budget) .....	8
Authority Engagement Meetings.....	8
Public Information Meetings.....	8
Receipt of Issues .....	9
Maintenance of Stakeholder Database .....	9
3.3 During Scoping PHASE.....	10
3.3.1 Availability of DSR.....	10
3.3.2 Notice of Review.....	10
3.3.3 Receipt and incorporation of comments .....	10
3.3.4 Notice of DMRE decision.....	10
3.4 During ESIA phase .....	10

3.4.1	Availability of DEIR .....	10
3.4.2	Notice of Review .....	11
3.4.3	Stakeholder Meetings .....	11
3.4.4	Public feedback meetings .....	12
3.4.5	Receipt and incorporation of comments .....	12
3.4.6	Notice of DMRE decision.....	12
<b>4.</b>	<b>PRESCRIBED TIMEFRAMES .....</b>	<b>13</b>
<b>5.</b>	<b>UPDATES.....</b>	<b>13</b>

## 1. INTRODUCTION

SLR Consulting (South Africa) (Pty) Ltd (“SLR”) has been appointed by Jindal Iron Ore (Pty) Ltd (“Jindal”) to undertake the Environmental and Social Impact Assessment (ESIA) process for an application for Environmental Authorisation (EA)<sup>1</sup> for the proposed Melmoth Iron Ore Project and other associated activities, in KwaZulu-Natal.

In terms of the National Environmental Management Act, 1998 (NEMA)<sup>2</sup> and the Environmental Impact Assessment (EIA) Regulations (GN R 982 of 2014), public participation is a key component of an ESIA process. Chapter 6 of the EIA Regulations prescribes the minimum requirements for such public participation which include:

- Identification and notification of potentially interested and affected parties (I&APs);
- Provision of project information to I&APs such that they may participate meaningfully;
- Making the reports produced during the ESIA process available to I&APs for review;
- The maintenance of an I&AP register and the recording of comments; and
- The incorporation of comments, including project responses, into submitted reports.

Given the locality of the Melmoth Iron Ore Project on land owned and administered by traditional/customary authorities, the outcomes of the public participation conducted for the previous ESIA, and the risks and restraints arising from COVID-19, it is advisable to undertake thorough planning for stakeholder engagement. The objective of the Stakeholder Engagement Plan is to ensure that the project has utilised the available information to anticipate and plan a thorough and robust engagement process that exceeds the minimum legislative requirements and has a reasonable chance of ensuring that all stakeholders are notified, informed and consulted through the project’s ESIA process.

This Stakeholder Engagement Plan will provide a basis for discussion and agreement between SLR and Jindal’s project team on the approach to Stakeholder Engagement. Although the “*Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licences*” published in Government Notice (GN) No. 650 of 5 June 2020, are not applicable at Alert Level 1, it is still advocated to discuss and agree the Stakeholder Engagement Plan with the Department of Mineral Resources and Energy (DMRE).

It is noted that stakeholder engagement in the context of an ESIA is dynamic and as such the Stakeholder Engagement Plan will be a fluid document, subject to updates as and when required.

## 2. RECOMMENDATIONS FOR JINDAL IRON ORE

### 2.1 NOTICE TO RECOMMENCE

Given the history of the project and sudden suspension, it is SLR’s strong advice to Jindal that Jindal make it known of their intent to recommence the project and commission an ESIA process. This should include a notice to, or

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<sup>1</sup> Additional authorisations may be required under other legislation and would be applied for through an integrated process.

<sup>2</sup> And other applicable legislation (e.g. NWA, NEMWA, NEMAQA)

meeting with, the traditional/customary leaders\* of the region and a public announcement. The message to be conveyed is that Jindal are revisiting the project with the intent of developing an iron ore mine and have appointed SLR to undertake the ESIA process. Such announcement should be distributed to Jindal's stakeholder database and the local press.

SLR will only undertake the public components of this Stakeholder Engagement Plan subsequent to these announcements having taken place.

\*SLR notes the meeting held on 4 February with representatives of the Zulu-Entebeni Traditional Authority and DMRE.

## 2.2 AVAILABILITY AND DISCLOSURE OF INFORMATION

Moving the project forward to a position where mining is possible is obviously Jindal's primary goal. However, it is important to note that while there is need/intent to move forward, this needs to be tempered against the accuracy and availability of project data. Launching public participation with information that may not accurately reflect the project scope, or which overstates the project in any manner, would only serve to involve more stakeholders than is potentially necessary and to inflame the response of stakeholders.

It is essential that the public participation process includes the transparent disclosure of complete, current and accurate information. Details on the phased approach to development of the mine will need to be presented clearly and accurately.

## 2.3 COMMUNITY LIAISON

It is strongly recommended that Jindal implement a community liaison programme independent of and in parallel to the ESIA process. The community liaison programme should ensure the regular disclosure of complete, current and accurate information on the project. The community liaison programme should include a Grievance and Feedback Mechanism that is operated by Jindal. The community liaison programme should be administered by Jindal, ideally via the appointment of, at least one, suitably skilled Stakeholder Engagement Manager and/or Community Liaison Officer (CLO) of local origin.

Any Jindal team member whose role entails interaction with external stakeholders needs to have the competency and ability to build and nurture positive company-community relations based on trust and mutual cooperation. Key competencies for anyone whose role entails interaction with external stakeholders on a regular basis are listed below:

- Good communication and listening skills;
- From the local area, fluent in the local language (specific for the CLO);
- Gender-sensitive;
- Able to provide answers to questions from stakeholders in a manner that aligns with the project's standard messaging;

- Able to acknowledge that they may not always be able to respond to a question and seek advice before doing so;
- Not making promises that can't be kept;
- Good understanding of community/cultural dynamics specific to the area;
- Open-mindedness and respect for the views of others;
- Proactive mind-set and good problem-solving skills;
- High level of integrity and trustworthiness; and
- Understanding of Jindal's business integrity and anti-corruption standards.

Contact information of persons engaging with Jindal via the community liaison programme/grievance mechanism, and any material issues and objections raised, should be forwarded to SLR on a monthly basis for incorporation into the Stakeholder Database and Issues trail.

## 2.4 SOCIAL LICENCE AND CONSENT

Stakeholder engagement is also more broadly required to facilitate a company/project's 'social licence' to operate and permission to access land. The social licence is not a formal approval, but rather the unspoken and ongoing acceptance and approval by local communities and various other stakeholders to operate a project. The requirement to obtain permission to access land is set out in terms of the Minerals and Petroleum Resources Development Act, 2002 (MPRDA), although such permission cannot be unreasonably withheld.

Importantly, the Interim Protection of Informal Land Rights Act, 1996 (IPILRA) provides that people with customary rights to land have "informal rights" for the purposes of the Act and that no-one with an informal right to land can lose that right without their consent. Furthermore, international law recognises that indigenous peoples have the right to free, prior, and informed consent over their land. This protection, as confirmed by the Xolobeni judgement in the High Court of Gauteng, prescribes the requirement for mining right applicants to obtain consent from the community residing on land administered under traditional/customary law.

The ultimate goal of the stakeholder engagement to be conducted by SLR is to meet the requirements of Chapter 6 of the EIA Regulations. It must be noted that while the stakeholder engagement may facilitate and contribute to other engagement processes, SLR's process does not explicitly aim to secure community consent nor to conclude negotiations on access to land or any form of compensation. This remains the responsibility of Jindal.



### 3. PUBLIC PARTICIPATION PROCESS FOR ESIA

An outline of the steps/actions that will be implemented through the public participation process throughout the ESIA process for the proposed project are provided in the sections below.

#### 3.1 COVID PRECAUTIONS

Consideration will be given to identifying and managing COVID related health risks throughout the undertaking of actions in respect of public participation for the Melmoth Iron Ore Project. Public participation will take place in phases over an extended period, with the effect that COVID risks, Alert levels and regulated restrictions, and best practice will change. A risk assessment will be undertaken prior to each phase/action of the public participation and precautionary measures will be implemented to minimise risks to stakeholders and the project team. Examples of likely COVID response measures include virtual meetings rather than face-to-face engagements, compliance with maximum venue capacities, wearing of masks for all engagements, social distancing, sanitising etc.

#### 3.2 PRE-APPLICATION

##### 3.2.1 DMRE Meeting

As part of the overall ESIA process a pre-application meeting was held with the DMRE on 3 March 2021. SLR discussed the SEP with the DMRE to obtain their advice and input on the requirements and approach to public participation with respect to the project locality and the current regulatory environment. The DMRE agreed that they would review this document and provide comments and suggestions, if any.

Minutes from the meeting of 4 February 2021 indicate that the DMRE recommended a project-community workshop, to be facilitated by the DMRE. At the pre-application meeting the DMRE indicated that the project-community workshop should take place independently of the public participation process.

##### 3.2.2 Stakeholder Identification

SLR will review the (pre-2014) I&AP databases that were supplied, to create a composite database of historic I&APs. This historic database will form the basis for the generation of a current stakeholder database. The structure of the dataset will be updated to a more modern format with searchable and sortable categories.

SLR will conduct a stakeholder scan and analysis, with consideration of the project's area of influence and locality to compile a current stakeholder database. The scan will include review of the historic stakeholder database, the identification of owners and occupiers of project and adjacent land, the identification of authorities with jurisdiction in the area, the identification of customary leaders and of businesses with an interest in the area. The collation of stakeholder information will be undertaken without revealing the project details until such time as Jindal has made public notice of their intent to recommence the project (see item 2.1). Thereafter, more formal enquiries will be made to ensure that the stakeholder database contains accurate information.

The stakeholder database will be agreed with Jindal before it is used for the distribution of project information.

All registered I&APs will be notified of each opportunity to participate in the ESIA process. The database of registered I&APs will be continually updated throughout the ESIA process as SLR identifies further stakeholders or parties register with SLR.

Stakeholders will be divided into the following sortable categories:

- Authorities:
  - National, Provincial and Local
  - Organs of State
- State Owned Entities
- Traditional Authority
  - iNgonyama Trust, Chiefs, Ndunas
- Business:
  - Land owners
  - Farmers and Associations.
- Civil Society:
  - Environmental NGOs and Public-Private Partnerships
  - Political groups
  - General Public

## Key Stakeholders

Given the location of the project and ownership of the underlying properties, the Traditional/Customary Authority structures and the communities that they represent will be key stakeholders to the project (both to the ESIA and the project). In this regard there are a number of structures that need to be considered including the Zulu King and Royal family and their advisors, the iNgonyama Trust, the Zulu-Entembeni AND Biyela Obuka AND Bayele Kwayangule Traditional Authorities and Ndunas of the area, and local residents. Engaging with the Traditional/Customary Authority structures and communities through the ESIA can be challenging due to a number of issues, including:

- The ESIA process is formal, regulated and scheduled whereas the customary systems are often unspoken, flexible, slow and subject to change.
- Unresolved conflict over who has jurisdiction over certain areas, who represents which communities and who has power to confirm acceptance/agreement/consent.
- Traditional customs which regulate the flow, dissemination and receipt of information, which may conflict with the participatory approach required of the ESIA.

In this regard the approach recommended in the Stakeholder Engagement Plan attempts to balance communication via the traditional structures with the transparent dissemination of information to all stakeholders.

The other key stakeholder grouping would be the commercial farmers who own/lease land that may be directly or indirectly affected by the proposed activities and infrastructure. Commercial farmers are typically organised into representative groups, making engagement and communication accessible and efficient.

## Land Owner Identification

SLR will undertake queries with the Surveyor General's office (via Windeed) to confirm current information on the names of owners of land within and immediately adjacent to the project. Additional searches will be undertaken to obtain contact information of the land owners (where possible – i.e. assuming complete information).

The provision of accurate information with respect to mineral right properties and infrastructure layout is vital as notification to landowners is a legal requirement of the EIA Regulations.

### 3.2.3 Notification and Dissemination of Information

Notification of the ESIA process will only commence once Jindal has made public notice of their intent to recommence the project (see item 2.1).

## Initial Engagements

In order to manage the flow of information and show key stakeholders due respect, it is proposed to host meetings with key stakeholder groups prior to the wider public participation process. In this regard the approach would be to host small, focus-group meetings to provide an introduction and preliminary information. In addition, the advice/counsel of these stakeholders would be sought in order to further align the Stakeholder Engagement Plan with their reasonable suggestions. Meetings will be considered and sought with the following groups:

- DMRE (as part of pre-application meeting);
- Zulu-Entembeni Royal Family;
- Zulu-Entembeni Traditional Council and Ndunas of the area;
- Biyela Obuka Traditional Council and Ndunas of the area;
- Bayele Kwayangule Traditional Council and Ndunas of the area;
- Ingonyama Trust Board; and
- Nkwalini and Melmoth Farmers Associations.

The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments. The meetings will be held in English or isiZulu, with capacity for full translation. The meetings will be recorded to assist in the generation of meeting notes. Reasonable requests for additional engagements will be discussed and agreed with Jindal.

## Background Information Document

A Background Information Document (BID) with preliminary and high-level project information will be compiled and distributed for information purposes to all identified I&APs. The BID will outline Jindal's proposed project, its extent and potential activities and will introduce the ESIA process, scope and opportunity for public involvement. A "Registration and Response Form" will be attached to the BID. The BID will provide notification of the proposed information meetings (if confirmed at this point). SLR contact details will be provided so that I&APs are aware of the methods available to contact SLR, this will include a cellular number for SMS and Whatsapp communication. The BID will be prepared in English and translated into isiZulu.

Distribution of the BID is described below and it will also be available from the SLR website. In addition, the BID will be placed on a zero-data website that enables I&APs to access and download the BID without incurring any data costs. Secondary distribution of the BID to other I&APs will provide opportunity to formally register on the project database (or request to be removed from the database), to submit contact details of other parties that might be interested or affected by the proposed activities and to submit any written comment for consideration. It is possible for I&APs to register on the project database at any stage during the ESIA process.

### Notification letter

I&APs and commenting authorities on the initial project stakeholder database will be notified of the application, ESIA process and opportunity for public involvement by means of a notification letter and the BID (in English and isiZulu), distributed via email and/or post. The letter will outline Jindal's proposed project, its extent and potential activities and will introduce the ESIA process, scope and opportunity for public involvement. A "Registration and Response Form" will be attached. The letter will provide notification of the proposed information meetings (if confirmed at this point). This communication will be sent prior to any of the other public announcements so that previous stakeholders hear directly from SLR. Hard copies of the BID will also be distributed during the door to door campaign described below. For I&APs without email or post a SMS and/or Whatsapp message will be sent.

Recipients of the letter will be requested to disseminate information to those that they represent and advise these parties to contact SLR for further information. Should recipients make a well-motivated request for support in the dissemination of information then this would be evaluated by the project team and agreed with Jindal.

### Door-to-door campaign

In order to ensure that a reasonable sample of residents within the South (primarily) and North blocks are directly informed of the ESIA process and have opportunity for involvement, SLR proposes to undertake a door-to-door campaign in order to distribute the BID and capture I&AP details. Provision is made in the budget for a three-day campaign. The campaign will be undertaken by Zulu speakers and will be mandated to ensure the inclusion of women and youth. COVID protocols will be followed, including mask wearing, social distancing and regular sanitising.

NB. It is advisable that consent for the door-to-door campaign be obtained from the Traditional/Customary Authority structures.

### Newspaper Advertising

Newspaper advertisements, in English and isiZulu, will be placed in one local and one regional newspaper. These advertisements will announce the start of the ESIA process, invite I&APs to register on the project database, and indicate opportunity for public involvement. The adverts will provide notification of the proposed information meetings (if confirmed at this point). SLR contact details will be provided so that I&APs are aware of the methods available to contact SLR, this will include a cellular number for SMS and Whatsapp communication.

## Site notices

An estimated 30 site notices, in English and isiZulu, will be placed in multiple locations within the project areas (schools/clinics/spaza shops/taxi ranks) and at locations in the towns of Melmoth and Eshowe. The placement of the site notices in the towns will target locations used by farmers. These advertisements will announce the start of the ESIA process, invite I&APs to register on the project database, and indicate opportunity for public involvement. The notice will provide notification of the proposed information meetings (if confirmed at this point). SLR contact details will be provided so that I&APs are aware of the methods available to contact SLR, this will include a cellular number for SMS and Whatsapp communication.

## Radio Notices (additional to the budget)

An additional method to augment the notification process would be radio notices, flighted on local/community radio stations that broadcast within the area. The value of radio notices is their potential to reach vulnerable and disadvantaged members of the community (i.e. cannot afford newspapers/ do not travel) as well as those who are isolated as a result of COVID.

The radio notices could be flighted multiple times per day, in isiZulu over a period of two days. The notices would include an introduction to the proposed project, notice of the ESIA process and SLR contact details.

## Authority Engagement Meetings

It is proposed to host a meeting(s) with key authorities during the public participation process. The inputs and positions of key authorities may have bearing on the ESIA scope, notably on the specialist study requirements.. Meetings will be proposed with the following authorities:

- Department of Water and Sanitation (as part of WULA pre-application meeting);
- Department of Agriculture and Rural Development;
- Department of Co-operative Governance and Traditional Affairs;
- Department of Economic Development, Tourism and Environmental Affairs; and
- Ezemvelo KZN Wildlife.

The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments. The meetings will be held in English with capacity for full translation to isiZulu. Reasonable requests for additional engagements will be discussed and agreed with Jindal.

## Public Information Meetings

### Physical

In order to facilitate engagement with residents within the project area, and direct engagement with potentially interested and affected parties, it is proposed to host public information meetings. Provision is made in the budget for four meetings over two days. In this regard the approach would be to host small, group-specific meetings to provide an introduction to the project and preliminary ESIA information. Meetings will be considered with the following groups of stakeholders at locations to be determined (final arrangements will depend on the advice/counsel of key stakeholders):

- Ward Councillors in Melmoth;
- Ndunas and community in North Block.
- Ndunas and community in South East Block.
- Ndunas and community in South West Block.

Relevant COVID protocols would be applied and (currently) meetings would be limited to a maximum of 50 participants with mask wearing, social-distancing and sanitising being enforced.

The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments. The meetings will be held in English or isizulu, with capacity for full translation. The meetings will be recorded to assist in the generation of meeting notes. Reasonable requests for additional engagements will be discussed and agreed with Jindal.

### **Online**

Due to the COVID-19 restrictions and potential health risks, there may be persons who do not wish to attend public information meetings. It is proposed to host an online public-information meeting (via Microsoft TEAMS). All stakeholders that are registered on the project I&AP database will be invited. The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments.

The meeting will provide an overview of the project proposal and ESIA process and provide stakeholders the opportunity to raise questions or concerns. The meetings will be held in English with capacity for full translation to isiZulu. The meetings will be recorded to assist in the generation of meeting notes.

A recording of the online meeting will be made available on SLR's website and thus I&APs who are not able to attend the live event (due to load-shedding or other reason) can view the content and submit questions to SLR. A notable benefit of the online format is that I&APs can attend from any location, without having to travel. Thus, the online meeting (and its recording) enables wide (in time and space) I&AP participation.

### **Receipt of Issues**

SLR will record all submissions made by I&APs and will ensure that comments are recorded in the submissions made during the ESIA process and incorporated, with relevant responses, in the reports (e.g. Scoping Report and EIA Report).

Should any I&AP contact SLR to indicate that they are not reasonably able to access any of the online or hard-copy project reports or attend meetings, SLR will implement suitable alternative means of providing the requested project information to these stakeholders.

### **Maintenance of Stakeholder Database**

SLR will maintain a database of I&APs that have registered their interest for the project's ESIA, for the duration of the ESIA process.

### 3.3 DURING SCOPING PHASE

#### 3.3.1 Availability of DSR

The draft Scoping Report (DSR) will be made available for a 30-day review and comment period. The report will be available on the SLR website for download. In addition, the DSR will be placed on a zero-data website that enables I&APs to access and download the DSR without incurring any data costs. I&APs contacting SLR for the DSR will primarily be directed to these websites. Where I&APs cannot reasonably access the internet, requests for alternative provision would be considered by the project team on a case by case basis.

Provided that COVID-19 status and the national alert levels allow, hard copies of the DSR will be placed in public libraries at Melmoth and Eshowe, as well as at localities with the north and south blocks (locations to be agreed with the Induna).

In order to make the DSR more accessible to a wider audience, SLR proposes to produce a Non-technical Summary document (NTS) which would be available in English and isiZulu. The NTS would present key information on the proposed project and ESIA process in a clear and concise manner. The objective is to provide I&APs with adequate and meaningful information from the DSR for them to determine their interest in further participation through the ESIA process. The NTS would be available for distribution electronically and in hard copy on request. The NTS would also be available for distribution via WhatsApp.

#### 3.3.2 Notice of Review

All registered I&APs will be notified of the 30-day DSR comment period. The notice will inform them of the release of the DSR, and where the report can be accessed for review. The notice will include a copy of the NTS of the DEIR (in English).

#### 3.3.3 Receipt and incorporation of comments

All issues raised by I&APs during the DSR review – either by email, post, telephone or during stakeholder meetings – will be consolidated into a Comments and Responses Report (CRR) which will be attached as an appendix to the Final Scoping Report. Where relevant the Scoping Report will be updated to reflect the incorporation of comments.

#### 3.3.4 Notice of DMRE decision

All registered I&APs will be notified of the DMRE decision to accept or reject the Scoping Report.

### 3.4 DURING ESIA PHASE

#### 3.4.1 Availability of DEIR

The draft Environmental Impact Report (DEIR) will be made available for a 30-day review and comment period. The report will be available on the SLR website for download. In addition, the DEIR will be placed on a zero-data website that enables I&APs to access and download the DEIR without incurring any data costs. I&APs contacting

SLR for the DEIR will primarily directed to these websites. Where I&APs cannot reasonably access the internet, requests for alternative provision would be considered by the project team on a case by case basis.

Provided that COVID-19 status and the national alert levels allow, hard copies of the DEIR will be placed in public libraries at Melmoth and Eshowe, as well as at localities with the north and south blocks (locations to be agreed with the Induna).

In order to make the DEIR more accessible to a wider audience, SLR proposes to produce a NTS document which would be available in English and isiZulu. The NTS would present key information on the project and ESIA findings in a clear and concise manner. The objective is to provide I&APs with adequate and meaningful information from the DEIR for them to make a meaningful interpretation of the ESIA findings. The NTS would be available for distribution electronically and in hard copy on request. The NTS would also be available for distribution via WhatsApp.

### **3.4.2 Notice of Review**

All registered I&APs will be notified of the 30-day DEIR comment period. The notice will inform them of the release of the draft ESIA Report and Environmental Management Programme (EMPr), and where the report can be accessed for review. The notice will include a copy of the NTS of the DEIR (in English). The notice will also include details of the public feedback meetings

### **3.4.3 Stakeholder Meetings**

To facilitate feedback on the ESIA findings with key stakeholders, meetings will be considered with the following groups (subject to the advice/counsel of key stakeholders derived during the ESIA):

- DMRE;
- Zulu-Entembeni Traditional Council and Ndunas of the area;
- Ingonyama Trust Board; and
- Nkwalini and Melmoth Farmers Associations.

Relevant COVID protocols in force at the time would be applied. The meetings will be held in English with capacity for full translation to isiZulu. Minutes will be recorded. The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments. Reasonable requests for additional engagements will be discussed and agreed with Jindal.



### 3.4.4 Public feedback meetings

#### Physical

In order to facilitate feedback on the ESIA findings with residents within the project area, and direct engagement with registered I&APs, it is proposed to host public feedback meetings. In this regard the approach would be to host small, group-specific meetings to provide an update on the project, present the ESIA findings and conclusion, and provide stakeholders the opportunity to raise questions or concerns. Meetings will be considered at the same locations as for the pre-application phase (subject to the advice/counsel of key stakeholders derived during the ESIA). Relevant COVID protocols in force at the time would be applied.

The meetings will be held in English with capacity for full translation to isiZulu. Minutes will be recorded. The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments. Reasonable requests for additional engagements will be discussed and agreed with Jindal.

#### Online

Due to the COVID-19 restrictions and potential health risks, there may be persons who do not wish to attend public feedback meetings. It is proposed to host an online public-feedback meeting (via Microsoft TEAMS). All stakeholders that are registered on the project I&AP database will be invited.

The meeting will provide an update on the project, present the ESIA findings and conclusion and provide stakeholders the opportunity to raise questions or concerns. The meetings will be held in English with capacity for full translation to isiZulu. Minutes will be recorded. The Jindal project manager must be present and able to provide a concise and accurate presentation on the project and corporate commitments.

A recording of the online meeting will be made available on SLR's website and thus I&APs who are not able to attend the live event (due to load-shedding or other reason) can view the content and submit questions to SLR. A notable benefit of the online format is that I&APs can attend from any location, without having to travel. Thus, the online meeting (and its recording) enables wide (in time and space) I&AP participation.

### 3.4.5 Receipt and incorporation of comments

All issues raised by I&APs during the DEIR review – either by email, post, telephone or during stakeholder meetings – will be consolidated into a CRR which will be attached as an appendix to the Final EIR. Where relevant the EIR will be updated to reflect the incorporation of comments.

### 3.4.6 Notice of DMRE decision

All registered I&APs will be notified of the DMRE decision on the application and the formal appeal process to be followed in terms of the National Appeal Regulations, 2014. A copy of DMRE's decision will also be uploaded onto the SLR website for review.

## 4. PRESCRIBED TIMEFRAMES

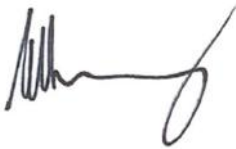
Activities proposed for the pre-application phase will be undertaken within a reasonable timeframe by are not subject to the legislated timeframes set out in the EIA Regulations 2014.

For all the timeframes prescribed for actions to be undertaken by the EAP, SLR intends to undertake all of these actions within the current legislated timeframes set out in the EIA Regulations 2014, (i.e. SLR will submit the Scoping Report within 43 days of submitting the application for Environmental Authorisation and submit the Environmental Impact Assessment Report within 107 days of the acceptance of the Scoping Report).

Registered I&APs will be provided with 30 calendar days to review and comment on each of the reports produced during the ESIA process.

## 5. UPDATES

This Stakeholder Engagement Plan details the public participation proposed for the ESIA on the Melmoth Iron Ore Project. It must be considered as a dynamic document that will need to adapt in response to information arising from public participation. With the passing of time the COVID alert level in South Africa and related Directions may change and additional information might become available as the ESIA process unfolds. This may necessitate changes to the public participation methods that are available, applicable and appropriate to the ESIA. The Stakeholder Engagement Plan would be amended and submitted to DMRE for agreement, as and when this occurs.



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**Matthew Hemming**  
(Report Author)



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**Kate Hamilton**  
(Project Manager)



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**Ed Perry**  
(Reviewer)

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# mineral resources & energy

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Reference: JINDAL IRON ORE (PTY) LTD

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## **PUBLIC PARTICIPATION PLAN – JINDAL IRON ORE (PTY) LTD**


The public participation plan lodged via email on 11/03/2021 has reference.

1. The Department hereby approves the proposed public participation plan.
2. The public participation process must always comply with the provisions of Regulation 41 – 44 of the EIA Regulations, 2014 (as amended) in due consideration of the Disaster Management Act and its associated regulations.
3. It is advised that you create a checklist to cross reference compliance with Regulation 40 - 44 of the EIA Regulations, 2014 (as amended) and include it at the front of the documentation (citing specific pages for ease of reference.
4. In respect of site notices, Reg 41(2)(a), *fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of - (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site.* It is advised that when site notices are being placed, co-ordinates are also taken of the notices and these points are

overlain on an orthophoto. The photos of the site notices as proof of compliance for the BAR and EMPr must be legible.

5. *In terms of Regulation 40 (3), Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*
6. Please feel free to contact this office should you have any queries.

Yours faithfully

  
**REGIONAL MANAGER**  
**MINERAL REGULATION**  
**KWAZULU NATAL**  
DATE: 15/03/2021