

TABLE D1: COMMENTS/OBJECTIONS ON THE PROPOSED PROJECT AND RESPONSES BY THE PROJECT TEAM

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
Procedural			
Time period	<p>We are informed by the EIA/EMPR Report that meetings pertaining to the Scoping Phase of the project were held with key stakeholders during 2013 and 2014. Reference is made on page 37 of the EIA/EMPR Report that a scoping meeting was held with the FSE on the 8th of May 2014.</p> <p>The Environmental Impact Assessment / Environmental Management Programme Report (EIA/EMPR) is dated March 2019 and we are advised on page (i) of the Report that the comment period is from 18 March to 7 May 2019 after which the final EIA/EMPR will be submitted to the DREAD and the DMR for decision-making.</p> <p>Kindly provide clarity why there was an effluxion of 5 (five) years between the Scoping Phase and the EIA phase.</p>	Mariëtte Liefferink, FSE Email received 25 March 2019	<p>The proposed process plant changes represents a significant financial commitment by PPM and therefore the mine conducted detailed investigations, including pilot plant testing, over the last few years to investigate the viability of the new technology (PPM).</p> <p>Following the test work the specialist studies required as part of the EIA were finalised. Results from the test work were used to inform the air quality specialist study and residue material from the pilot testing was subjected to geochemical testing to inform the groundwater specialist study.</p>
Municipal plans	<p>We failed to find reference to the BPDME EMF in the EIA/EMPR. Since the EMF functions as a support mechanism in the EIA process and is a decision support tool, which ensures that the competent authority has sufficient information to guide EIA authorization decisions within a specific geographical area, the EIA/EMPR ought to have included the findings and recommendations of the BPDME EMF namely:</p> <ul style="list-style-type: none"> • the environmental management priorities of the area; • the kind of developments or land uses that would have a significant impact on those attributes and those that would not; • the kind of developments or land uses that would be undesirable in the area or in specific parts of the area; • inclusion and exclusion areas (if deemed feasible/necessary), or areas of particular sensitivity in terms of the proposed NEMA EIA Regulations list of activities. 	Mariëtte Liefferink, FSE Email received 25 March 2019	<p>Reference to the Environmental Management Framework (EMF) for the Bojanala Platinum District Municipality has been included in the EIA and EMPr (see Section 5.1 of the EIA and EMPr). In terms of the EMF, PPM and the proposed project are located in Zone C, Development Zone III (Mining). The PPM mine falls within an area of moderate hydrological, biodiversity and agricultural potential. Mining activities within Zone C should as far as possible be confined to Zone C, be conducted in a sustainable manner, avoid wetlands/ aquatic features/high or sensitive biodiversity areas/sensitive topography areas and follow the guidelines in the EMF if they are within a biosphere buffer zone. The proposed project is aligned with guidelines for the specific management zone.</p>
Consultation process	<p>Are you sensitising the Council or require permission from the Council? The information provided is too technical and we won't remember this presentation 3 months from now.</p>	Obed Phaladi, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	<p>The project is technical in nature given that it relates to changes to the processing facilities at the mine. The purpose of the meeting with the BBKTA Traditional Council was to share information on the project and the outcome of the EIA process, to record any comments or issues and to agree on further public participation within the communities.</p>

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Consultation process	<p>English advertisements are a problem. Most of the people in the village cannot read.</p> <p>The credible individuals who can decide/represent the community are only available on weekends. Any meetings need to take place on a Saturday.</p> <p>In February 2019, DMR said Mine must consult us. PPM hasn't come to us to talk about this expansion. They are not allowed to do any projects until they consult with us. You cannot speak to the Chief alone and then claim you have consulted the whole community. The Chief cannot have a dual role in representing the community and the mine at the same time. He can't be on the Board.</p> <p>Even for the original EIA in 2007 we were never consulted.</p>	David Pheto, Lesetlheng Land Committee Chairman Comments received 04 April 2019 at PPM Open Day	<p>SLR placed site notices in key areas in the communities inviting community members to the planned open day. The site notices were both in English and in Setswana.</p> <p>The comment regarding community meetings needing to take place on weekend is noted by SLR.</p> <p>It is SLR's understanding that the consultation referred to relates to access to the Wilgespruit farm. The proposed project would however take place mainly within the existing plant footprint on the farm Tuschenkomst and Witkleifontein. Nonetheless, following a meeting with the BBKTA in March 2014, scoping meetings were planned with PPM's doorstep communities including Lesetlheng, between 7 and 11 April 2014. Unfortunately Lesetlheng cancelled their meeting. A public open day took place on 4 April 2019 in order to provide I&APs with an opportunity to interact with the SLR and PPM project team and provide comments on the outcome of the EIA process and related EIA and EMPr. In addition, a community meeting was planned with Lesetlheng for 19 May 2019 but due to a death of a senior member of the larger community the meeting was cancelled. SLR attempted to reschedule the meeting for 9th June 2019 but the meeting did not take place. Subsequent to this, a decision was taken by the applicant and SLR to finalise the public consultation that had taken place to date and submit this to the regulatory authorities for decision-making.</p> <p>In 2005 a social scan of the surrounding villages was conducted by Metago with the assistance of PPM social responsibility personnel. The purpose of the social scan was to identify the closest villages to the planned PPM mine. At the time of the social scan the following villages were identified: Motlhabe, Legkraal/Bofule, Ngweding, Magong, Ntsana-le-Metsing, Tlhatlhaganyane, Mabeleleng and Tlhorosane.</p>
Consultation process	Employees in the Mine were the previous landowners and they have not yet been consulted. Need to engage with the Kgosanas, Land Committees and CPAs as well as have a meeting at the mine for the workers. When are you going to have other meetings again?	Simon Theledi (BBKTA) Comments received 04 April 2019 at PPM Open Day	It is expected that employees at the mine live in the communities and would be engaged through the relevant community structures. In addition, site notices were placed at the entrance to the mine for employees to take note of.

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Consultation process	In terms of the proposed Public Meetings, why have you only selected the said places if Bakgatla has 32 villages?	Thabo, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	The selected villages are the doorstep villages to PPM. It was agreed during the traditional council meeting that Lesetlheng, Ramasedi, Ramoga and Legkraal would be clustered together; Motlhabe, Ngweding, Ntswana le Metsing, Magong and Magalane would be clustered together and Lekutung would be met with on its own.
	Why are you here today?	Ananius Dube, Motlhabe Community Member Comment received 08 June 2019 at Community Meeting	The purpose of the meeting was to facilitate feedback to the community on the PPM Plant Expansion project.
	What are your overarching objectives for the open day? What general categories of information would you plan to share with the stakeholders? What would be your indicators of success for the overall engagements?	Mesegane Mesegane (III) (BBKTA) Comments received 04 April 2019 at PPM Open Day	The purpose of the open day was to provide I&APs with an opportunity to interact with the SLR and PPM project team, address any queries of clarification and to provide comments on the outcome of the EIA process and related EIA and EMPr. Information shared at the open day related to the technical project scope and the outcome of the EIA and EMPr process.
	Would like an electronic copy of the report.	Joyce Pule (BBKTA) Comments received 04 April 2019 at PPM Open Day	An electronic copy of the report on CD was provided to Ms Pule at the open day.
	Frustrated with the process. Raising of issues is on-going and there is no response or action from the mine.	Jacob Rasepae (Lesetlheng Community) Comments received 04 April 2019 at PPM Open Day	Questions and comments were addressed during the open day where they related to the proposed project. Any comments related to current PPM operations should be addressed directly with PPM through their community liaison team.
Impact Assessment	Impact Assessment: 1. Impact Title changes to social and cultural practices in local communities. 2. Impact nature: Whether the impacts are positive or negative and whether it is direct or indirect. 3. Project Phase: In which the impact will be experienced. 4. Impact Description: The aspects of local baseline that are likely to result in an impact occurring. 5. Potentially affected: Receptor groups/types of people that are going to be affected.	Mesegane Mesegane (III) (BBKTA) Comments received 04 April 2019 at PPM Open Day	These points have been noted and were considered when compiling the EIA and EMPr.
Performance Standards	The eight performance standards establish standards that the client is to meet throughout the life of an investment by IFC. Performance Standard 1: Assessment and management of environmental and social risks and impacts and Performance Standard 6: Biodiversity conservation and sustainable management of living natural resources.	Mesegane Mesegane (III) (BBKTA) Comments received 04 April 2019 at PPM Open Day	This comment has been noted.

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Compliance	The mine still has a lengthy lifetime i.e. approximately 40 years. With mine managers changing from time to time, how is consistency & adhesion to the EIA & the EMP fostered?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	In terms of the National Environmental Management Act (107 of 1998) the Environmental Authorisation issued is legally binding and the mine has an obligation to implement the actions and mitigation measures in the EIA and EMP report.
SLP process	Why does the EIA have the SLP process?	Obed Phaladi, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	The EIA reflects community based-initiatives at the request of the DMR. The SLP process is not a component of the EIA.
Mining in sensitive areas			
Sensitive areas	The SAHRC in its Report on the “ <i>National Hearing of the Underlying Socio-Economic Challenges of Mining Affected Communities in South Africa</i> ” directed the DMR and the DEA to immediately issue public notices of applications in sensitive areas and to convene extensive public participation, including with local communities, prior to the granting of such licences. Since the proposed project is located mainly within an area of high biodiversity importance according to the Mining and Biodiversity Guidelines and downstream of the TSF and plant in an area of highest biodiversity importance, and the Motlabe River in terms of the NFEBA, a class B river, we request that in compliance with the SAHRC’s directive the DMR immediately issue public notices of this application and convene extensive public participation prior to the granting of this licence.	Mariëtte Liefferink, FSE Email received 25 March 2019	The proposed project is related to changes to the existing approved PPM processing plant and would be located within existing footprints. No additional areas would be disturbed. No additional licenses are being applied for.
Technical			
Location	Where is the project situated? Is it a new site?	Ananius Dube, Motlabe Community Member Comment received 08 June 2019 at Community Meeting	The proposed project is located within the existing plant footprint. It is not a new site.
Technology	The planned KELL process utilizes new technology. To what degree has this been tested & what are the implications for Black Rhino in particular and for the Pilanesberg at large?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	Detailed investigations, including pilot plant testing, over the last few years was undertaken by PPM to investigate the viability of the new technology (PPM).
	The proposed project is new technology that’s going to reduce air pollution by hydrometallurgical system.	Bogosi Mothusi, I&AP Written comment received 05 April 2019	Potential impacts associated with the proposed KELL plant have been identified and assessed in the EIA and EMP. The EIA concluded that when considering the nature and extent of PPM’s approved operations, the net substantive cumulative change is limited. This is linked to the fact that the proposed project would largely be developed within the current footprint and range of activities at the mine noting that the KELL process is a new technology.

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Project scope	What specifically will be done to minimise noise, dust & light pollution given that the expansion plan brings mine operations closer than ever before?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	The proposed project is related to the expansion of the existing PPM processing plant only and does not affect any aspects of the mining operation. No additional mining or changes to the mine plan are proposed.
	What is the regulation relevant to how close our fence line can be encroached upon relevant to the new open pit & when will the open pit be commenced? 500 metres?		
	Are you expanding the mine?	Karabo Tlou, BBKTA Comments received 23 April 2019 at BBKTA Meeting	
Project timing	The timeline slide speaks to probabilities; we want to monitor the process and report so we are not misunderstood to giving consent to the project.	Obed Phaladi, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	Subject to obtaining environmental authorisations, the construction and commissioning of each component of the mineral processing operations is dependent on market conditions, board approval and funding. At this stage in project planning, it is anticipated that construction could commence in 2021.
	When will the project begin?	Boitumelo Mogapi, Motlhabe Community Member Comment received 08 June 2019 at Community Meeting	
Process	What is happening right now? The details in the presentation are too much and will have been forgotten by most of us 4 months from now.	Neo Mafatshe, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	
Existing Approvals			
Approval status of the Closure objectives EIA and EMPr Report	<p>On page 2 of the EIA/EMPr we are informed that the amendment of the closure objectives of the Tuschenkomst Pit from backfilling and the re-establishment of land to a water supply and tourism hub facility were approved by the DMR in 2012.</p> <p>This comes as a surprise to the FSE since the FSE appealed the authorisation by the DMR in 2013. At the time we were informed as follows:</p> <ol style="list-style-type: none"> On the 10th of January, 2013 Mr. Zingaphi Jakuja, on behalf of the DMR, responded as follows to Ms. Sue Blaine of Business Day: <i>“The time frame for deciding on the matter cannot be confirmed. (Several allegations were made which warrant thorough investigations not only by DMR but other organs of state such as the Department of Water Affairs, Dept of Labour etc). The MPRDA does not spell out time frame for this matter; however the complainant shall be notified once a decision has been arrived at and the matter is viewed in a serious light and is treated as such”.</i> (Emphasis added.) On the 21st of January 2013, the FSE was requested by the Director 	Mariëtte Liefferink, FSE Email received 25 March 2019	The proposed project is related to the expansion of the existing PPM processing plant only and does not affect any aspects of the mining operation. Any comments related to other regulatory processes should be addressed directly with PPM and the relevant regulatory authority.

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	<p>General (Mineral Resources) to furnish the office of the DMR with a reply to the response by the PPM, dated the 17th of January, 2013.</p> <p>3. The Director General of DMR advised the FSE, in its letter, dated the 21st of January 2013: <i>“Please note that should you fail to respond as aforesaid, we shall then proceed with the processing of the appeal without further notice to you.”</i></p> <p>4. The FSE supplied the office of the DMR with a response within the prescribed time period of 21 days. The FSE received an electronic copy from the DMR confirming receipt of the document. It follows hence that the FSE was entitled to be notified by the Director General of Mineral Resources of the DMR’s decision regarding this matter.</p> <p>5. On the 13th of February, 2013 Mr. Zingaphi Jakuja, on behalf of the DMR, publicly stated to Carte Blanche that: <i>“It must be noted that although the addendum to the approved Environmental Management Programme was approved for the change in closure objectives, the conditions of the approval letter clearly state that the project is approved for “complete backfilling”. (Emphasis added.)</i> This was the essence of the FSE’s appeal, namely the complete backfilling of the pit and not a partial backfilling.</p> <p>6. On the 11th of August, 2013, the FSE, enquired, in an electronic mail, from Ms. Fiona Bolton of SLR Consulting the status of the Amendment of the Pilanesberg Platinum Mine EMP Closure Objectives (Environmental Impact Assessment and Environmental Management Programme: Amendment).</p> <p>7. On the 12th of August, 2013, Ms. Bolton responded that <i>“it is our understanding that this matter has not yet been resolved, and that IAPs will be notified of the outcome once it has been finalized.”</i></p> <p>8. On the 7th of September 2013 the FSE requested the status of Appeal from Mr Tshoganyetso Mesefo of DMR.</p> <p>9. On the 10th of September 2013 Mr Brandon Stobart stated at the Pilanesberg Protected Areas Forum: <i>“SLR is not aware of the adjudication outcome.”</i></p> <p>10. On the 30th of September 2013 at a meeting between the FSE, the DMR, the DWAF and the DEA, Mr Andre Cronje of the DMR stated that the Appeal has not been finalised.</p> <p>11. In an undated letter in response to Mr Brandon Stobart’s e-mail, dated</p>		

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	<p>the 21st of November 2013, Mr. Dean Riley on behalf of PPM informed the FSE: <i>“This letter serves to confirm that all interested and affected parties (including the FSE) will be informed of the DMR’s decision on this project after the DMR has finalised (sic) its decision. This notification will be distributed on behalf of Platmin by SLR Consulting as part of the normal EIA /EMP notification process.”</i> (Emphasis added.) The FSE, at the time of writing, did not receive any notification from PPM or from SLR of the DMR’s decision.</p> <p>12. On the 14th of January 2014 the FSE submitted a request for the status of the Appeal in terms of the provisions of the Promotion of Access to Information Act (2 of 2000) to Messrs Tshoganyetso Mesefo and Abraham Nieman of the DMR.</p> <p>13. On the 31st of March 2014, in response to another request for the status of the Appeal by the FSE on the 13th of March, 2014, Adv Woods Mogopudi, Senior Legal Officer: Legal Services of the DMR responded: <i>“Kindly be informed that we still awaiting the response of the Regional Manager: North West on his administrative decision in this matter. A reminder will be send henceforth to the Regional office for their urgent response. We concede that the decision in this matter is long overdue and we shall endeavour to bring it to finality expeditiously.”</i></p> <p>14. On the 1st of April 2014, the DDG: Mineral Regulation of the Department of Mineral Resources, Mr Andre Cronje responded that the matter is <i>“sub judice”</i>.</p> <p>At the time of writing the FSE, as the Appellant, has not been notified that its Appeal against the authorisation of the amendment of the closure objectives of the Tuschenkomst Pit has been dismissed. In terms of the provisions of Section 33 of the Bill of Rights of the Constitution of the Republic of South Africa the FSE has the right to administrative action that is lawful, reasonable and procedurally fair and had the right to be notified of the outcome of its Appeal. Failure in this regard will result in the sterilisation of the FSE’s right to have the decision by the DMR reviewed by the judiciary.</p> <p>In the light of the statement on page 2 of the EIA/EMPR we kindly request clarity on the matter.</p> <p>The FSE firmly holds to the view that the proposed closure plan to allow the Tuschenkomst Pit to be used as a water supply is unsustainable. Analogous to the FSE’s view, the DMR (North West), identified using pits as strategic</p>		

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	<p>water resources as “<i>unrealistic closure objectives</i>”. (Please see Annexure “A”.) Perplexingly and anomalous to the DMR’s expressed statement at the DEA’s EIA Sector Seminar titled “<i>Working towards Improved Relations</i>”, the DMR authorised the said closure plan to allow the Tuschenkomst Pit to be used as a water supply.</p>		
<p>Closure objectives for the mine</p>	<p>The closure objectives are listed on page 29, namely:</p> <ul style="list-style-type: none"> • Erosion prevention • Ensure that all areas are free-draining and non-polluting • Establishment of vegetation allowing the area to be used for light grazing or wilderness • Monitor and manage alien plants on site <p>On page 45 we are informed that the final end use of the area is wilderness, which would be incorporated into the heritage park corridor. We wish to raise the following concerns regarding the end land use.</p> <p>In terms of Appendix 5 of the 2014 EIA Regulations a closure plan must include:</p> <p><i>“(d) measures to rehabilitate the environment affected by the undertaking of any listed activity or specified activity and associated closure to its <u>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;...</u></i>” (Emphasis added.)</p> <p>We consider it necessary for the EIA/EMPR to define the term “<i>wilderness</i>”. If by wilderness the EIA/EMPR means an unspoilt natural area which is biologically intact, undisturbed and which will contribute to the tourism and eco-tourism of the region, it will meet the above-mentioned principle of sustainable development.</p> <p>If on the other hand the term “<i>wilderness</i>” is employed in the EIA/EMP Report to mean badlands or wastelands or unrehabilitated footprints, then the proposed end land use is a sub-economic and an unsustainable land use, which may reduce the livelihood opportunities and the quality of life of communities who are reliant on the land for their livelihoods.</p> <p>Please also define the term “<i>light grazing</i>.” It is of the utmost importance that the end land use will provide opportunities for food security, albeit subsistence farming, for seasonal grazing for livestock, for tourist activities and for access to forest foods and water.</p> <p>Of relevance in this regard are the findings and directives of the South African</p>	<p>Mariëtte Liefferink, FSE Email received 25 March 2019</p>	<p>The closure objectives as referred to in the EIA and EMP, related to the processing facilities, were taken from the approved EMP. The main purpose of this project is not to change the closure objectives of the mine but to address the proposed changes to the processing facilities which would take place within the existing footprint of the plant.</p> <p>Nonetheless, the term “wilderness” refers to a natural environment while “light grazing” refers to grazing practises that do not over-utilise the land.</p> <p>With the implementation of the NEMA Financial Provision Regulations it will be a requirement for the mine to review its closure objectives and financial provision in line with the regulations.</p>

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	<p>Human Rights Commission pursuant to its <i>“National Hearing on the Underlying Socio-Economic Challenges of Mining Affected Communities in South Africa.”</i> The Commission found that the DMR has not taken adequate steps to secure financial provision for rehabilitating damage to the environment and water resources and that <u>there is an immediate need for all EIAs and EMPRs to clearly detail land quality and potential post closure land use. Licences should not be granted where long term, sustainable land use cannot be guaranteed.</u> Please see attached Report.</p> <p>Furthermore, the end land use as proposed by the Applicant is that that <i>“wilderness” ... “would be incorporated into the heritage park corridor”</i>. The EIA/EMPR (page 55), however, informs us that the Lebatlhane Game Reserve, which was previously included in the heritage park, <i>“no longer operates as a reserve and is used by the community for livestock grazing”</i>, and that there are numerous challenges that face this initiative, which include but are not limited to a lack of investors, numerous private and community land owners, existing linear infrastructure as well as existing and proposed developments including mining operations. In view of the aforesaid, the proposed end land use may not be realistic or sustainable, and an alternative land use ought to be proposed.</p>		
Air Quality			
Air quality	<p>We understand from the reading of the EIA/EMPR that the proposed KELL Process will result in a reduction of 70% CO₂ emissions. While this is encouraging, we noticed that in terms of the main findings of the AQMP of 2016 that the PM₁₀ exceeded the SA NAAQS and the dust fallout rates exceeded the SA National Dust Control Regulations’ standard of 1 200 mg/m² for non-residential areas. The construction of the proposed infrastructure is likely to contribute to the dust fallout rates, which are already exceeding the NDCR standard.</p> <p>Monitoring of the dust fallout is recommended as a mitigation measure in the EIA/EMPR. We recommend, in terms of the proposed amendments to the National Dust Control Regulations and in view of the above-mentioned</p>	Mariëtte Liefferink, FSE Email received 25 March 2019	<p>With reference to Section 6.4.1.8 of the EIA and EMPr, it should be noted that although the main findings from the AQMP (which was based on modelled predictions) indicated exceedances of certain air quality standards, monitoring data from PPM’s air quality monitoring programme generally shows compliance with applicable limits for dust fallout, PM2.5 and PM10. Sampled dust fallout rates exceeded the national dust control limits at five monitoring sites during 2015. During 2016 and 2017 sampled dust fallout was in compliance with the limits at all sampling locations. Where exceedances of PM2.5 and PM10 have been recorded, these were either caused by a veld fire (in 2016) or likely one-time events (in 2017) such as wild fires, activities very close to the sampling locations or high wind gusts.</p> <p>Dust fallout monitoring is included as part of the monitoring programme (see Section 29 of the EIA and EMPr). Reference to the National Dust Control Regulations has been included under the</p>

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	<p>exceedances:</p> <p>With regards to the monitoring of dust:</p> <ul style="list-style-type: none"> • The use of windshields on the dust buckets which should be tailored to allow for tolerance ranges for the bucket diameter (150mm ± 30mm); • A minimum ratio of depth to diameter (1:2); • A height of a sampler above ground (2m±0.2m uncertainty); • The method to allow for both wet and dry sampling (algae control – biocide). <p>With regards to management of dust:</p> <ul style="list-style-type: none"> • Prior to undertaking the proposed activity, the Applicant ought to develop and implement a dust management plan. <p>We furthermore request that consideration be given to the presentations which were delivered at the Bojanala Air Quality Task Team in order to assist with the assessment of the cumulative impacts of air pollutants within the Bojanala District. (Please see Appendices “D”.)</p> <p>Page 81 of the EIA/EMPR informs us that at the time of the study no information was available regarding the KELL plant stack locations or stack parameters and that the impacts were based on assumptions and simulated emissions. We are furthermore informed that atmospheric releases occurring as a result of non-routine conditions are not included in the dispersion model modelling.</p> <p>We recommend that the project not be authorised unless the above-mentioned uncertainties are addressed. The precautionary principle ought to</p>		<p>methodology to be applied.</p> <p>A dust management plan is included as a mitigation measure in the mine’s approved EMPr and will be applied to the proposed project.</p> <p>Cumulative impacts of the PPM Plant Expansion Project were considered, but use was made of measured on-site particulate and gaseous concentrations which are considered to be representative of the study area. The other monitoring stations in the Bojanala District, for which the results were delivered by the Bojanala Air Quality Task Team, are located a significant distance from the PPM operation (the closest monitoring stations to the PPM operations are the Phokeng and Thabazimbi stations, both of which are located more than 50km from PPM) and as such are not considered to be representative of baseline ambient air quality at the PPM operations. Variability in the concentrations recorded at the various stations is indicative that monitored concentrations are likely highly influenced by local sources at each monitoring location. (Response provided by Airshed)</p> <p>The assumption used by the air quality specialist relating to the location of the KELL plant stack (assumed to be at the centre of the plant footprint) was deemed appropriate by the specialist due to the relatively small size of the facility. The specialist is of the opinion that a change in location of the stack would not materially change the findings of the air quality study. Similarly the stack parameters referred to in the section of the report relate to the height of the stack. The EMPr commitment states that: “Stack heights at the KELL Plant will be maximised as far as is economically viable (minimum of</p>

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	apply. The mining industry and the State should have gained enough experience from the asbestosis and silicosis catastrophes in South Africa to justify the application of precautionary principles.		12 m in height)". For the purposes of modelling a conservative height of 5 m was applied.
Air quality	I have noticed surface rock-particles being blown into the park from the waste rock dumps. How will this be mitigated in the future?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	The proposed project is related to the expansion of the existing PPM processing plant only and does not affect any aspects of the mining operation. The EIA concluded that when considering the nature and extent of PPM's approved operations, the net substantive cumulative change is limited. This is linked to the fact that the proposed project would largely be developed within the current footprint and range of activities at the mine noting that the KELL process is a new technology. It further stated that provided the EMPr is effectively implemented there is no biophysical, social or economic reason why the project should not proceed.
	During sunset, you can see a cloud of dust over PPM, this is affecting our health and land.	David Pheto, Lesetlheng Land Committee Chairman Comments received 04 April 2019 at PPM Open Day	
Water			
Water quality	Will it affect groundwater?	Ananius Dube, Motlhabe Community Member Comment received 08 June 2019 at Community Meeting	As informed by the groundwater specialist study, considering the proposed project and the nature and extent of PPM's approved operations, the proposed project has the potential to add additional impacts if unmitigated, specifically in the post-closure phase, depending on operational mitigation measures and the source concentration of the TSF. The net cumulative significance rating for the overall cumulative impacts remains unchanged. The significance post-closure is influenced to a large extent by the conservative geochemical modelling and does not take into account active pump and treat mechanisms. Where pump and treat mechanisms and the final rehabilitation of the TSF prevent the migration of a contamination plume affecting third party boreholes, the significance post-closure would be reduced. (See Appendix D of the EIA and EMPr).
Biodiversity			
Biodiversity	There is a large Bullfrog pan that overlaps where the new open pit will be. What is the plan with respect to protecting this endemic species?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	The proposed project is related to the expansion of the existing PPM processing plant only and does not affect any aspects of the mining operation. The open pit referenced in the comment is the existing approved open pit on the farm Rooderand and was reflected on the map for completion purposes
Poaching	The fence adjacent to where the planned open pit will be has been risky for us from a poaching perspective. What is the plan to deal with the constant poaching threat given the foot & vehicle traffic typically associated with an expansion of this nature, magnitude & life span?		
Visual			

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Visual	<p>Page 5 of the Visual Impact Assessment informs us that <i>“in this study the aesthetic evaluation of the study area is determined by the professional opinion of the author based on site observations and the results of contemporary research in perceptual psychology.”</i> While we acknowledge the experience, the awards and academic contributions of the specialists, and that <i>“both the objective and subjective or aesthetic factors associated with the landscape were considered”</i>, we request the decision makers to give serious consideration to Guideline Documentation such as the <i>“Sense of Place”</i> by Duard Barnard as well as the findings of the Court in the case of <i>Director: Mineral Development Gauteng Region and another v. Save the Vaal Environment and others 1999 (2) SA 709 (SCA) at 715C</i> in which the learned Judge considered the depreciation in property values and the adverse impact on sense of place and the elimination of the spiritual, aesthetic and therapeutic qualities associated with the area, and found in favour of SAVE. The assessment of the specialist was advised by a site visit on the 12th of April 2017 but we are not informed of the site, which the specialist visited and his consultation with directly affected parties, e.g. Bakubung and Kwa-Maritane within the Pilanesberg National Park.</p> <p>We are, however, informed that the bright lights of PPM are noticeable against the otherwise dark sky; that the overall landscape character evokes an aesthetically pleasing scene with a strong sense of place; and that PPM is in close proximity to the Pilanesberg National Park and the proposed Heritage Park Corridor.</p> <p>We are furthermore informed that most of the views of the proposed large and tall structures will originate in the Pilanesberg National Park through the ‘poort’ access to the park and that the sensitive receptors will be tourists travelling through the area to visit the Pilanesberg National Park.</p> <p>The Visual Impact Assessment Report furthermore informs us that:</p> <ul style="list-style-type: none"> • Tourism is one of the main activities in the area and includes high profile conservation areas and tourist destinations such as the Pilanesberg National Park. • The Pilanesberg National Park is a major, internationally known, tourist attraction and it has attracted significant tourist activity. One of the reasons that tourists go to nature conservation areas such as the Pilanesberg National Park is to get away from the bright lights of the city and to enjoy the darkness of the night sky. 	<p>Mariëtte Liefferink, FSE Email received 25 March 2019</p>	<p>The visual specialist study predicted that the incremental significance of the proposed project would be MEDIUM during construction and LOW during operations. In the context of the proposed project and considering the nature and extent of PPM’s approved operations, the proposed project will add moderate additional impacts during construction (which would be for a short period of time) and thereafter minor additional impacts during operations. This is evident from the viewshed analysis that was prepared by the specialist where the viewshed remains almost unchanged. The net cumulative significance rating for the overall cumulative impacts remains unchanged. (See Appendix E of the EIA and EMPr)</p> <p>A commitment to have sustained engagements with stakeholders including the Pilanesberg National Park and Black Rhino Game Reserve has been included in the EMPr (see Section 27 of the EIA and EMPr).</p>

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
	<ul style="list-style-type: none"> • The reason for tourism to be attracted to the area, in addition to game viewing, is the scenic beauty and sense of place. • The advent of mining activities has eroded the night time experience of remoteness or wilderness which lacked many light sources. • The sense of place is being accumulatively impacted upon by mining activities. • The impact of night lighting is an impact that would continue for the remainder of the mine’s life. • The negative effect of night lighting against a relatively dark sky is particularly annoying to tourist and residents visiting the Pilanesberg National Park. • The darkness of the night sky, associated with nature tourism, is slowly being compromised in the area north of the Pilanesberg National Park. • The impact of the existing PPM mine and other surrounding mining activities already have a high negative effect on the visual environment. • Light pollution is already a problem in the area. • The Project will contribute to the current negative effects of light pollution. • The additional lights from the proposed Project will contribute to the existing negative impact of mining/plant activities at night on sensitive tourist areas in the area; • The UG2 milling and Flotation circuit and the KELL plant and its stack will be visible to the Pilanesberg National Park, the night-time impact of additional lighting will be cumulative in nature as project components will be built into existing mineral processing facilities; <p>We are alerted to the fact that the proposed Project will extend the current processing activities for an additional forty years. It logically follows that the visual impacts will also be extended for forty years.</p> <p>The proposed measures to mitigate this impact are to paint the buildings green or brown colours, to fit fixtures to prevent light spillages and to focus the light on precise mine activities and infrastructure, fitted to the ground as low as is practicable.</p> <p>We do not consider these mitigation measures to be adequate and we recommend sustained engagements with the Pilanesberg National Park to address the impacts on the sense of place, which has an economic value.</p>		

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
	The loss of sense of place ought to be costed in order to determine whether the proposed project is economically justifiable.		
Visual	Queried the extent of visual impacts and whether the project would add to these.	Stephen Dell, North West Parks Board Comments received 04 April 2019 at PPM Open Day	Considering the proposed project and the nature and extent of PPM's approved operations, the proposed project will add moderate additional impacts during construction and minor additional impacts during operations. The net cumulative significance rating for the overall cumulative impacts remains unchanged. Mitigation measures as per PPM's EMPrs will be applied to project-specific activities. (See Appendix E of the EIA and EMPr)
Visual	What specifically will be done to minimize the visual impact of the expansion effort particularly over the construction period?	Dr Alan Bougardt, Black Rhino Email received 10 April 2019	
Noise			
Noise	Queried the extent of noise impacts and whether the project would add to these.	Stephen Dell, North West Parks Board Comments received 04 April 2019 at PPM Open Day	When considering the project's impact cumulatively with the approved PPM operations, and that the contribution of noise sources from the proposed project would have a negligible effect on cumulative impacts, the significance rating for the overall mine remains unchanged. (See Appendix E of the EIA and EMPr)
Palaeontology			
Palaeontology	The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of the impact to palaeontological resources be conducted as part of the EA application process, as the proposed development is located within an area of moderate palaeontological sensitivity as per the SAHRIS PalaeoSensitivity Map. The assessment must be conducted by a qualified palaeontologist and must comply with the SAHRA 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. Further comments will be issued upon receipt of the above. SAHRA advises the applicant to follow the process in terms of section 23(1)b of the NEMA Regulations in order to extend the EA process to comply with this comment.	Natasha Higgitt, SAHRA Email received 18 April 2019	A Palaeontological Impact Assessment was undertaken by Professor Marion Bamford in May 2019 and has been included in the EIA and EMPr. The findings of the study have not altered the outcome of the impact assessment. Although there is a very small chance that fossils might occur in the project area a Chance Find Protocol has been included in the EMPr for implementation during the construction phase (see Sections 6.4.1.2 and 30.2 and Appendix L of the EIA and EMPr)
Financial Provision			
Closure	Page 82 of the EIA/EMPr informs us that the current financial closure liability does not make allowance for the development. Page 74 of the EIA/EMPr informs us that, pertaining to closure, the surface and groundwater remediation has not been costed at this stage. In terms of s 5(c) of the National Environmental Management Act (107/1998): Regulations pertaining to the Financial Provision for Prospecting, Exploration, Mining or Production Operations "An applicant or holder of right or permit must make financial provision for—remediation and management of latent or	Mariëtte Liefferink, FSE Email received 25 March 2019	The closure liability calculation for the proposed project has been prepared as an addendum to the latest current financial closure liability calculation (Digby Wells and Associates, 2018) for PPM and incorporates only the proposed infrastructure changes at PPM. It should be noted that these infrastructure changes are planned within the existing plant footprint. Given that PPM is an existing operation, compliance with the NEMA Financial Provision regulations will be a requirement in 2020.

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
	<p><i>residual environmental impacts which may become known in future, including the pumping and treatment of polluted or extraneous water."</i></p> <p>It follows hence, in view of the above-mentioned Regulations, that the financial closure liability of the development and the remediation costs for surface and groundwater must be determined prior to the authorisation of the Application.</p>		
Socio-economic			
Employment and Community benefits	The proposed project is making sense to me. It's going to create a lot of job opportunities and community business opportunities.	Bogosi Mothusi, I&AP Written comment received 05 April 2019	The construction phase workforce is expected to be approximately 70 skilled and 300 unskilled people. The operational phase workforce associated with the proposed project is expected to be approximately 70 skilled and 70 unskilled people. Given the technical nature of the KELL process, PPM's intention is to upskill and transfer existing employees from the concentrator operations to the hydrometallurgical plant. The positions that become available within the concentrator operations would then be used to provide new employment opportunities. (See Section 3.2.9 of the EIA and EMPr)
	Will communities and small businesses be able to get opportunities?		
	Will small businesses and the community be able to get skills from this proposal?		
	Is this proposal going to be beneficial to the community?		
	The proposed project is going to increase minerals so that our development can be built in zozo's and transform in short space of time.	Virginia Pilane, BBKTA Comments received 04 April 2019 at PPM Open Day	
	Clarification regarding employment opportunities.	Joyce Motlathledi, BBKTA Comments received 04 April 2019 at PPM Open Day	
	Poverty and socio-economic issues are important to us. Mine needs to provide more employment opportunities. It's the same issues in all villages. 30-40 year olds have no jobs and their children suffer because of it.	Boitumelo Mogapi, Motlhaba Community Member Comment received 08 June 2019 at Community Meeting	
Is there going to be any jobs?			
Social indicators	<p>Like environmental indicators, social indicators are intended to help:</p> <ol style="list-style-type: none"> 1. Inform people about trends; 2. Predict future changes; 3. Identify and monitor problems and priorities to the problems; 4. Evaluate the effectiveness of policies and programmes. 5. Understanding impacts on communities: <ol style="list-style-type: none"> 5.1. Climate change; 5.2. Poor water quality; 5.3. Improved health awareness and treatment; 5.4. Safety hazards; 	Mesegane Mesegane (III) (BBKTA) Comments received 04 April 2019 at PPM Open Day	Comment noted.

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	5.5. Company policy procedures on EIA.		

TABLE D2 ISSUES RELATING TO EXISTING PPM OPERATIONS AND RESPONSES BY THE PROJECT TEAM

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
Water supply	The people in Ngweding were complaining about insufficient water resources. But nothing is done about it.	David Pheto, Lesetlheng Land Committee Chairman Comments received 04 April 2019 at PPM Open Day	The Magalies Water reservoir installed by PPM on behalf of Magalies Water has a pipeline from the reservoir to the Ngweding village. This was done by Magalies Water. (Response provided by PPM)
	PPM dug boreholes in Motlhaba and is abstracting water from the same stream as the community, this leads to depletion in our resources. What is PPM doing to solve this?	Setshego Tau, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	The boreholes sunk by PPM at the start of mining were used to supply water to the mine before the regional Magalies Water supply was commissioned. Since then the boreholes have not been used to abstract water. In addition the boreholes were operated in a sustainable manner based on the water use licence, ensuring the aquifer was not damaged with a 95% confidence level. Further the boreholes are in the process of being handed over to the municipality to be included in the area water supply network. (Response provided by PPM)
Human health	The 1000 people in Ngweding should be moved due to pollution. They are dying silently. And they won't say anything because their Kgosana supports the mine.	Refiloe Moenda (Lesetlheng Community) Comments received 04 April 2019 at PPM Open Day	The dust emissions from the mine are within the required standards. (Response provided by PPM)
	Dust is a problem in (Lesetlheng) to Human health and gardening. Mine activities aren't environmentally friendly.	Jacob Rasepae (Lesetlheng Community) Comments received 04 April 2019 at PPM Open Day	
Health of cattle	Cattle are dying. Mine activities aren't environmentally friendly.	David Pheto, Lesetlheng Land Committee Chairman Comments received 04 April 2019 at PPM Open Day	The waste dumps have the necessary pollution control paddocks installed to prevent runoff water from reaching the environment. (Response provided by PPM)
	Waste rock stockpile is too close to the boundary fence and our cattle are drinking the water that runs off and are dying.		
	The people in Ngweding were complaining about water pollution which causes death to cattle. But nothing is done about it.		
Blasting	Our houses are cracking.	Jacob Rasepae (Lesetlheng Community) Comments received 04 April 2019 at PPM Open Day	An independent blast specialist will be appointed to investigate blasting related impacts from PPM's operations. (Response provided by PPM)
Heritage	The heritage between Mmatone and Mogare is being degraded. What is PPM doing about this?	Simon Theledi, BBKTA Comments received 04 April 2019 at PPM Open Day	PPM does not undertake any activities in the heritage area; this area is used by local farmers. (Response provided by PPM)

Specific issue	Issue raised	By whom, when, how	Response provided by SLR (unless otherwise specified) (updated where necessary)
Community based initiatives	We request whether the community-based initiatives (an aggregate crusher and brick making project; nursery; vegetable garden and composting area; and car wash) have been agreed upon by the affected parties, community based organisations and other relevant stakeholders; are aligned to the SLP; and whether the SLP has been consulted with the mining affected communities and key stakeholders and have been made available to the mining affected communities and key stakeholders	Mariëtte Liefferink, FSE Email received 25 March 2019	The LED projects are aligned with the mine's SLP and have been implemented after the required necessary consultation with the communities. (Response provided by PPM)
	We are not happy with the current Community Based Initiatives (Car-wash etc.) taking place; surely the mine can invest more in the community.	Kagiso, BBKTA. Comments received 23 April 2019 at BBKTA Meeting	
Consultation with regards to access to the farm Wilgespruit	We have a right to oppose or agree. This study is money-generated. Previous consultants failed to identify gravesites at Lesetlheng due to non-consultations. Our Human Rights attorney (Louis Du Plessis) is engaging with PPM to set up a meeting with them. We are doing this and not PPM, which is what they are supposed to be doing.	David Pheto, Lesetlheng Land Committee Chairman Comments received 04 April 2019 at PPM Open Day	PPM is actively engaging with the Lesetlheng Land Committee to address the issues raised. (Response provided by PPM)
Zoning	Rezoning. The area is not zoned for mining so mining can't take place.	Refiloe Moenda (Lesetlheng Community) Comments received 04 April 2019 at PPM Open Day	PPM complies with all legislative requirements relevant to mine. (Response provided by PPM)