



February 2017

## SAMANCOR CHROME

# Samancor Proposed Mining Operations at Varkensvlei Comment and Response Report

**Submitted to:**

Samancor Chrome (Pty) Ltd  
Department of Mineral Resources

REPORT



**Report Number.** 1416935-307798-5

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An EIA was conducted during 2013 and 2014 in support of an application for environmental authorisation for listed activities to be undertaken on the farm Varkensvlei 403 KQ. The environmental authorisation was granted by the DEA on 27 March 2015. Samancor applied for a mining right on 22 September 2015 and the application was accepted by the DMR on 23 October 2015. In terms of the EIA Regulations GN R. 984 that commenced on 8 December 2014, an application for a mining right is a listed activity that triggers an EIA process. The scoping report for this EIA process was made available for public comment from Friday, 2 October 2015 to Friday, 30 October 2015.

Issues raised during the previous EIA Scoping Phase in 2013 were captured in a Comment and Response Report (CRR). These included comments raised at the Open House event that was held on Wednesday, 8 May 2013 at the Union Mine Recreation Hall and Focus Group meetings that took place from 17 April 2013 to 25 April 2013.

A special meeting was eventually held with the Baphalane-Ba- Mantserre community leaders and representatives on 11 June 2013 and the comment period was extended to 28 June 2013 at the request of Chief Saltiel Ramokoka.

All comments and issues received during the comment period of the previous Draft Scoping Report were documented in a CRR that accompanied the Draft Environmental Impact Assessment Report (DEIAR).

During the Impact Assessment Phase, a public meeting was held on 16 April 2014 at the Baphalane-Ba-Mantserre Community Hall and Focus group meeting with Anglo American - Union mine on the 14 April 2014. The purpose of these meetings was to present the findings of the DEIAR to the interested and affected parties (I&APs) and provide them with the opportunity to verify that their issues were captured correctly and provide further comments.

Comments and issues raised during this subsequent EIA have been added to the original CRR.

During May 2016 representatives of the Baphalane Ba Mantserre Community Trust lodged an objection against Samancor's application for a mining right. At a meeting with the DMR on 23 June 2016 Samancor was instructed to hold an additional public meeting. This meeting was held on 20 July 2016, but was disrupted. Samancor re-submitted the application for environmental authorisation on 12 August 2016 and made the Scoping Report available for public comment from 26 August to 26 September 2016.

This CRR summarises all the comments received until 13 December 2016.



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## COMMENT AND RESPONSE REPORT

ISSUE / COMMENT	COMMENTATOR	REFERENCE	RESPONSE
<b>1.0 SAMANCOR OWNERSHIP</b>			
Are BCR affiliated with Samancor?	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	No - BCR is a separate company with a stand-alone operation that has no ties with Samancor Chrome. BCR does not have any agreements in place to assist in the mining or management of any of the Samancor projects for which authorisation is being sought.
Is Samancor applying for ground that is already being mined?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	No - the Draft Scoping Report may have created the impression that Samancor is applying to mine on Nooitgedacht Portions 6 and 7, which are currently being mined by BCR. This is not correct and it has been rectified in the Final Scoping Report. Thank you for picking this up.
What is BCR's role with Samancor?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	The company BCR has no ties with Samancor Chrome, but two of its directors, Messrs Stewart McQuade and Walter Murray are providing Samancor with consultancy services in their private capacities.
The concern is freehold land and the impact on that?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor owns the affected land on Nooitgedacht and will negotiate with the owners of the affected land on Varkensvlei
There cannot be a mining right where two companies overlap.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	That is correct. Samancor holds the surface rights to Portions 6 and 7, but are applying for mining rights on Portions 2 and 10 for Chromite in the Lower and Middle Group seams.
Does BCR have a mining right?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	BCR has management control and a majority shareholding in the mineral rights to chrome on portions 6 and 7 of Nooitgedacht 406 KQ.



## COMMENT AND RESPONSE REPORT

ISSUE / COMMENT	COMMENTATOR	REFERENCE	RESPONSE
<b>2.0 PROJECT SPECIFIC</b>			
If Samancor are only mining in this small area, then why are they applying for such a large mining right area?	Alan McGill Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The area depicted on the map displayed at the land owner meeting actually depicts the farm boundaries, not the mining rights application. This has been rectified in the Final Scoping Report.
What is the breadth of the area being mined?	Alan McGill Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Please see figure 1-1 in the Final Scoping Report
Mining companies often come with lots of promises to achieve authorisation, but once they have the mining rights they seem to do whatever they please. What is the legal recourse for surrounding landowners if the mining company does not adhere to their promises?	Alan McGill Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	An Environmental Management Programme is a legally binding document and should mining companies not adhere to the stipulations in the EMP they can be taken to task by stakeholders, through the DMR. Regular audits are required by the DMR to ensure compliance.
Will the mine be operating on a 24 hour basis?	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Yes, mining will be on a continuous basis but no blasting will be done after six in the afternoon. Blast designs will take sensitive areas into consideration.
Should Samancor's planned infrastructure disturb the current Union Mine areas (including residential), there would need to be appropriate compensation and resettlement.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will meet with Anglo Union Mine to discuss such matters.
What is the exact outline of the open pit, the berms and other mining related infrastructure?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting Anglo Union Mine Office 14 April 2014	As per the discussions and agreements during the meeting Samancor will provide these to Anglo Union Mine



## COMMENT AND RESPONSE REPORT

ISSUE / COMMENT	COMMENTATOR	REFERENCE	RESPONSE
Where is Haakdoordrift?	Johan Bekker Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	About 34 km north-east of Varkensvlei and 15 km south of Thabazimbi
I would like to better understand the position of the seams that form the backbone of the mining operation.	Johan Bekker Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Please refer to figure 1-1 in the EIA Report, where the locations of the chromite seams and the proposed opencast mining area are shown schematically
In which direction will the mining take place?	Johan Bekker Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	From the north-eastern part towards the south-western part of the opencast mining area shown in figure 1-1
I would like clarification on where my land lies in relation to the mining activities/ footprint of the proposed Samancor Chrome Mine.	Johan Bekker Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	The exact location of Mr Bekkers' property in relation to the proposed mining activities was shown to Mr Bekker on a Google Earth image immediately after the meeting.
What will Samancor Chrome do if, during extraction activities, they find platinum?	Petrus Monegi Community Member – Mantserre Village	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Heather Booysens: Samancor Chrome has applied for a right to mine chrome only. Samancor will only have the right to extract that particular mineral in accordance with legislation. Etienne Roux: Geologists did not find viable platinum reserves during their surveys
What is the total number of years envisaged for the Run of Mine?	Sandy McGill Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	The estimate life of the opencast mine will be approximately 8 years. During this time Samancor Chrome will undertake a detailed assessment of the viability of underground mining, which could increase the life of mine to about 30 years



## COMMENT AND RESPONSE REPORT

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Samancor Chrome should verify the statement by Anglo Union Mine that there are servitudes for power lines, sewerage pipelines and water pipelines on Mr Bekker's land. These servitudes were determined in 1946.	Johan Bekker Landowner	Landowner Focus Group Meeting Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Samancor Chrome will liaise with Anglo regarding servitudes that might be affected by the proposed mining activities
How will Samancor Chrome address land access and associated challenges that may arise for farmers once the mine is in the construction/operation phase?	Johan Bekker Landowner	Landowner Focus Group Meeting Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Such issues will be discussed and agreed upon with landowners prior to construction
I am not against any company that would like to do opencast mining at Varkensvlei 403 KQ.	Ditlebe Petrus Monegi Community Member – Matserre Village	Written comment 23 April 2014	Thank you for this comment
Objection to a resolution taken by members of the Baphalane-Ba Mantserre Community on 18 November 2014 and the outcome of a RMDEC meeting held in Polokwane on 27 November 2014 as a result of which Samancor was able to apply for the mining right and the DMR was able to accept the application.  In a letter to the DMR dated 29 November 2014 it is alleged that the Baphalane-Ba Mantserre Community Trust had previously signed a memorandum of understanding with another mining group.	L. Monene Trustee of BBMCDT	Submission of a letter to DMR (dated 29 November 2014) to Samancor Chrome on 28 October 2015	Negotiations between Samancor and the Baphalane community for the proposed lease of the mining area have been conducted under the auspices of the Department of Rural Development and Land Reform in public meetings after engagement with the relevant Community Structures and Traditional Leadership Authorities
<b>3.0 ENVIRONMENTAL</b>			
Blasting can cause cracks in underlying aquifers which can impact on borehole water and affect irrigation/crops.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	That is possible. Blast designs will take such concerns into account and groundwater parameters will be monitored.



## COMMENT AND RESPONSE REPORT

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All farming activities in the area make use of borehole water. At present there has been no visible impact on borehole water due to mining in the area, this could change however	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Thank you for this comment. A specialist groundwater study will form part of the impact assessment process and groundwater parameters will be monitored.
Would the groundwater study possibly test landowner's boreholes in the area?	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The groundwater specialists would welcome the opportunity to test the boreholes in the area. This will be organised with the individual land owners.
The biggest impact on their property would be noise and dust as they are the closest neighbours to the proposed mine.	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Mitigation measures for noise and dust will be developed in the impact assessment phase and will be incorporated into the EIA Report and the EMP.
Blasting can cause structural damage.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	A blasting buffer zone of 600m has been determined around the proposed mine and blast designs will take such concerns into account.
Community members don't want big mine dumps when the mine ceases operation, it needs to look the same as it looks now.	Reiner Guba, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The rollover mining method, involving continuous backfill will be followed. The mined out area will eventually have similar contours as at present. Rehabilitation takes some time as soil has to settle and vegetation has to be re-established. A rehabilitation and closure plan forms part of any mining authorisation.
Noise and blasting causes damage to structures and tranquillity of his guest house.	Reiner Guba, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Mitigation measures for noise and dust will be developed in the impact assessment phase and will be incorporated into the EIA Report and the EMP.





## COMMENT AND RESPONSE REPORT

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If there is no water, there is no business.	Reiner Guba, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Water quality and quantity are almost always the most pertinent issues in any mining application. Samancor will practice dry mining and ore processing. Water for dust control will be sourced from the mine's stormwater control dam and potable water from Magalies Water.
The landowners are eager to get involved in the EIA. When are they doing the studies? The landowners can give the specialists valuable input as they have lived in the area all their lives. For instance, land owners know exactly where wetlands are situated and which fauna and flora is present in the area i.e. the scarce species of reedbuck who have been living in the area.	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Thank you very much for the positive attitude, land owners are always very good sources of local knowledge and we will convey this offer to all the specialists who will conduct studies in the area.
Concerned about depleting the water resource and contamination	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Samancor will practice dry mining and ore processing, i.e. there will be no requirement for process water. The surface and groundwater specialists will formulate mitigation measures to protect water resources.
What if the mine comes and takes the water away or there is a decrease in water; Sometimes water stops and then people have to go and buy water.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The surface and groundwater specialist studies will take such concerns into consideration. Please also refer to previous responses on concerns about water.
Landowners enquired who they could contact to report contraventions of the Water Use Act. It seems that there are some mines in the area that are mining without a Water Use Licence. This created the impression that anything was possible as long as you know the right officials in the departments.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The National Water Act stipulates the requirements before mining companies can start operations. Landowners can report their concerns to the Department of Water Affairs.



## COMMENT AND RESPONSE REPORT

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Clarity must be provided regarding soil and land use capability after mining. Once mining has ceased this land should be suitable once more for planting sunflowers. Therefore the depth of the topsoil must be noted beforehand, if the depth of the topsoil was two metres before mining, it should be rehabilitated to the same state after mining.	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	The specialist in soil sciences will provide a detailed soil management plan, with specific reference to the actions required to restore the land capability as close to its original condition as possible.
Landowners are concerned that their lucerne and sunflower crops will be negatively impacted by mining in the area.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	Mitigation measures will be developed to minimise negative impacts on crops. These mitigation measures will be incorporated into the EIA Report and EMP.
The landowners' main concerns are water, noise, dust and lights.	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	All of these aspects will be studied and mitigation measures will be stipulated in the EIA Report and EMP.
Samancor must check the drainage routes into the dam and the cumulative effects.	Alan McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	A surface water study will be done to understand the drainage routes and to determine the impacts of the proposed mining operations.
Water from the Magalies pipeline is piped to the Union mine from where it is the responsibility of the mine to channel the water to its operation and residents. This water thus belongs to the Union Mine and cannot be sold on to other mines.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	Thank you for this information.
The impact of a new mine on the boreholes belonging to the Union Mine should be determined.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	The planned groundwater study will assess potential impacts on the Union Mine boreholes.
Union mine has a hospital and a horse riding centre, the possible effect of blasting on these facilities should be determined.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	The hospital and horse riding centre seem to be outside the 600m blasting buffer zone, but the concern is noted and will be investigated.



## COMMENT AND RESPONSE REPORT

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Union Mine's water license does not allow them to distribute water to third parties. Anglo has applied for three WUL areas namely: The Bierspruit and Brakspruit catchment area as well as the new water treatment plant in Northam. Samancor must ensure that their water license does not interfere with Union Mines.	Madeleine Bornman – Environmental Manager Anglo Union Mine  Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	Thank you for this information. It would be appreciated if a copy of the Union Mine Water Use Licence could be obtained to facilitate alignment between the two mining companies and their WULs.
Samancor needs to clarify the influence of chrome mining on the water catchment area.	Madeleine Bornman – Environmental Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	A surface water study will be done to determine any influence on the catchment area.
Wind blows in a north-westerly direction. There is concern that dust will blow right over the Union Mine village. There are three monitoring points consisting of dust buckets and two boreholes.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	An air quality study is being done to determine the impact of dust on the area and to suggest suitable mitigation measures. The results will be incorporated in the EIA Report, which will be made public.
How will general waste, including office and hazardous waste be disposed of by Samancor?	Madeleine Bornman – Environmental Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	General and office waste will be disposed of at the nearest municipal landfill site. Hazardous waste will be collected by a licensed waste management company for disposal at an appropriately licenced site.
Where will Samancor's sewerage be disposed of?	Madeleine Bornman – Environmental Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	Samancor in the initial phase of the mine will use chemical toilets and the tanks will be pumped out by tankers. French drains will not be used.
Anglo had to divert the Bierspruit and the Brakspruit dam. This is a very costly process. It must be clarified how Samancor plan to handle river and dam diversions.	Madeleine Bornman – Environmental Manager Anglo Union Mine	Union Mine Focus Group Meeting  April 2013	Neither the Bierspruit River nor the Brakspruit dam will be affected by Samancor's planned mining activities.



## COMMENT AND RESPONSE REPORT

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As the Union Mine is an underground operation it could be fatal if teams are underground when Samancor blasts in their proposed pit. Shafts will need to be evacuated when Samancor blasts. Thus early notification of blasting activities is of the utmost importance.	Jens Kernick – Service Section Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will have open communication channels with Union Mine to ensure that no persons are put at risk with blasting. Blast designs and notification will be given to Anglo Platinum Union Mine 48 hours prior to blasting.
The noise of a 24 hour operation is of great concern due to the proximity to the Union Mine village. People in the village work day and night shifts and thus need to get their sleep to work efficiently.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Thank you for this comment. Appropriate mitigation measures and noise abatement measures will be investigated.
Samancor must familiarise themselves with Union Mines' closure plan and consider the plan in the light of their proposed access road that falls within the Union Mine's footprint area.	Madeleine Bornman – Environmental Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Thank you for this suggestion. This will be followed up by Samancor.
The Archaeology specialist, did they do any study around the area regarding medicine plants or old graves	Chief Saltiel Ramokoka, Baphalane ba Mantserre Community Development Trust	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	The proposed mining area was subjected to agriculture about 20 to 35 years ago. Although it is recuperating, it is still degraded with regard to species diversity.  The ecological survey did not find any Red Data species or any rare plants of medicinal importance.  The archaeologist did not find any graves within the proposed project area and reported only the formal cemetery at Mantserre



## COMMENT AND RESPONSE REPORT

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What will Samancor use for explosives and can these explosives contribute to the contamination of water?	Sandy McGill Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Typically, a blasting slurry containing a mixture of ammonium nitrate and fuel oil is used in opencast mining. Blast holes are lined with plastic and charged with the slurry. Most of the ammonium nitrate and fuel oil is converted to gases upon detonation, but small quantities could enter the rock and report in groundwater in the immediate vicinity of the mining area. However, mine dewatering to ensure safe working conditions will cause groundwater migration inwards towards the active mining area and the groundwater in the surrounding areas is unlikely to be affected
If Samancor Chrome contributes to the deterioration of the water quality through their mining operations, how will they address this negative impact?	Sandy McGill Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	If the water quality deteriorates the source must be investigated to establish responsibility. . According to legislation the Department of Water Affairs can step in and fine the responsible party. If the party's activities are shown to have caused a reduction in the availability of water to users that are reliant on the groundwater, they must be supplied with water from another source.  The Samancor Chrome project will be a relatively small mining operation and it is unlikely to have a severe impact on the water resources. They have to adhere to legislation in managing their water usage and mitigate the pollution of water resources.



## COMMENT AND RESPONSE REPORT

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<p>My farming operation is reliant on boreholes which yield up to 60 000 litres per hour.</p> <p>I am concerned about how the mining induced activities could severely impact my boreholes/ groundwater resources and regular, high yields.</p>	<p>Johan Bekker Landowner</p>	<p>Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014</p>	<p>Groundwater monitoring will be carried out during construction and operation to identify any impact on borehole yields and water quality.</p>
<p>What will happen to houses that are affected by blasting? Sometimes a powerful blast can affect houses up to 1000 metres away from the blast site.</p>	<p>Frans Muatse Mantserre Village</p>	<p>Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014</p>	<p>Before mining commences, a crack survey will be undertaken to establish the condition of structures within the potentially affected area. Vibration monitoring will take place at various points during each blast. Complaints received about blast damage will be investigated and addressed as may be necessary..</p>
<p>Water is our basic need. Where is Samancor Chrome going to get water from for their mining process?</p>	<p>Sammy Diale Mantserre Village</p>	<p>Written Comments 16 April 2014</p>	<p>The process will not need a water supply. It will be a dry mining and ore beneficiation process based on a mobile crushing and screening plant. Stormwater runoff will be captured in a silt settling pond. Groundwater seepage into the mine will also be pumped to this pond. This water will be used for dust control</p>
<p>I am concerned that blasting will result in cracks to my house, structures and workshop located on my plot which is in close proximity to the 600m buffer zone for blasting.</p>	<p>Johan Bekker Landowner</p>	<p>Landowner Focus Group Meeting Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014</p>	<p>A crack survey will be done prior to commencement of mining and each blast will be monitored. Any damage caused by the mining operation will be addressed appropriately</p>



## COMMENT AND RESPONSE REPORT

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It is important that rehabilitation be done.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	That is correct. As required in terms of current environmental legislation, the mine's EMP describes rehabilitation measures and Samancor is required to guarantee funding for proper closure and rehabilitation. The roll-over mining method will be applied, whereby rehabilitation is undertaken continuously behind the advancing mining front. Please see section 1.2 in the EIA Report for a description.
The DMR has evaluated the submitted Scoping Report and Plan of Study for Environmental Impact Assessment and is satisfied that the documents comply with the minimum requirements of Appendix 2(2) of NEMA EIA Regulations, 2014 and it is hereby accepted in terms of regulation 22(a) of the NEMA EIA Regulations, 2014.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	Thank you for your comment.
Samancor may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the NEMA EIA Regulations, 2014.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	Your comment is noted.



## COMMENT AND RESPONSE REPORT

<p>Details of the future land use for the site and infrastructure after decommissioning in 20-30 years should be provided.</p> <p>(a) The total footprint of the proposed development should be indicated.</p> <p>(b) Should a Water Use License be required, proof of such application needs to be submitted.</p> <p>(c) Possible impacts and effects of the development on the surrounding industrial area should be indicated.</p> <p>(d) Information on services required on the site, e.g. sewage, refuse removal, water, electricity etc., and the supplier(s)' agreement/confirmation should be submitted.</p> <p>(e) A construction and operational phase of the EMPr should include impacts mitigation and monitoring measures.</p> <p>(f) Should blasting be required, appropriate mitigation measures should be provided.</p>	<p>Regional Manager: Mineral Regulation Department of Mineral Resources</p>	<p>Comment submitted 23 February 2016</p>	<p>As stated in sections 6.5, 7.6.3, 9.4 and 9.9.3 of the EIA/EMPr Report, the land disturbed by the project will be restored to a condition fit for grazing.</p> <p>a) The estimated footprint on Varkensvlei is indicated as 460 ha in section 2.5.3;</p> <p>b) A copy of the proof of payment of the licence application fee will be sent to the DMR;</p> <p>c) Bushveld Chrome Resources (BCR) and Anglo Platinum's Union Mine are respectively located approximately 4km to the east and 2 km to the south of the proposed Varkensvlei – Nooitgedacht mining area. Please refer to the relevant sub-sections of section 7 for an indication of the project's assessed impacts on these two industrial operations.</p> <p>d) A package sewage treatment plant will be installed on the site and it will be serviced by the supplier/contractor. "Dirty" runoff from stockpiles and mine infrastructure, will be routed to the pollution control dam (PCD) and recycled to the mine and plant as process water. Shortfalls will be made up by abstraction of groundwater, water make in the mine and/or water sourced from Magalies Water. The water balance is discussed in section 7.7.1 of the EIA/EMPr Report. Electricity will be sourced from Eskom. Emergency</p>
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## COMMENT AND RESPONSE REPORT

			<p>power will be supplied by diesel generators</p> <p>e) Please see section 10.5 of the EIA/EMPr Report</p>
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## COMMENT AND RESPONSE REPORT

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The applicant is hereby reminded to comply with the requirements of regulation 3 of the EIA Regulations, 2014 with regards to the time period allowed for complying with the requirements of the Regulations.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	This was done – please refer to section 3.7.2 of the EIA/EMPr Report
Please ensure that the EIA Report includes the A3 size locality maps of the area and illustrates the exact location of the proposed development. The maps must be acceptable quality and as a minimum have the following attributes: <ul style="list-style-type: none"> <li>• Maps are relatable to one another;</li> <li>• Co-ordinates;</li> <li>• Legible legends;</li> <li>• Indicate alternatives;</li> <li>• Scale; and</li> <li>• Vegetation types of the study area.</li> </ul>	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	This has been done
Possible impacts and effects of the development on the ecology with regard to lowland-highland interface in the locality should be indicated.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	The proposed project will not impact on any lowland-highland interface. The nearest hill is located about 7 km to the north-east and the nearest highland area is at least 11 km to the north.
The impacts of the proposed facility on avifauna and bats must be assessed in the EIA phase.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	Please refer to sections 4.7.2 and 7.6 of the EIA/EMPr Report
Should an application for Environmental Authorisation be subjected to any permits or authorisations in terms of the provisions of any Specific Environmental Management Acts (SEMAs), proof of such application will be required.	Regional Manager: Mineral Regulation Department of Mineral Resources	Comment submitted 23 February 2016	Thank you for this comment. Of the five listed SEMAs, only the NEMWA is applicable to this project and Samancor has applied for a Waste Management Licence.



## COMMENT AND RESPONSE REPORT

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<b>4.0 INFRASTRUCTURE</b>			
The suggested access roads to the proposed mine are controlled by Union Mine and they also maintain these roads. The proposed new mining traffic on these roads is of concern.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	The proposed Samancor infrastructure plan is not yet finalised and various options are being investigated. Thank you for the input.
The tarred road between Union Mine and the Mantserre community was sponsored by the Union Mine. This road was upgraded to ensure safe transport of Union Mine employees to their place of work. If this road will be utilised by the proposed Samancor mine, safety of Union Mine workers would be compromised.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will liaise with Union Mine in this regard however it does not intend using the tar road as this is also a safety and security risk.
The D40 road issue must be discussed between Samancor and the Baphalane ba Mantserre Leaders	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	Mr Desmond McManus of Samancor Chrome confirmed that this issue would be resolved in consultation with the Community
The Province is busy with road maintenance between Sefikile and Moruleng. Union Mine employees come from these villages too and their safety would also be compromised should Samancor use this road for their haul trucks.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Noted. Samancor will liaise with Union Mine in this regard, however Samancor takes the safety of others as a serious concern.
The Samancor mine trucks will be impacting on the main road between Union Mine and Northam. Will Samancor assume any responsibility for road maintenance?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will liaise with Union Mine in this regard. Where Samancor will be using existing roads provision will be made to allow for on-going maintenance.
Anglo Union Mine has very strict control over its own vehicle movements through the mine village. It would not be possible to control another mining company's vehicles through the area.	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will liaise with Union Mine in this regard, however Samancor cannot be restricted access to their surface, and a detailed traffic management plan will be put in place.



## COMMENT AND RESPONSE REPORT

ISSUE / COMMENT	COMMENTATOR	REFERENCE	RESPONSE
<p>Samancor needs to verify where they will get their electricity from? Union Mine gets electricity into a central distribution point from Eskom and distributes electricity to their mine and their village from that point. There are thus two sub-stations that are maintained by Union Mine electricians.</p>	<p>Pier de Vries – Mineral Resource Manager Anglo Union Mine</p>	<p>Union Mine Focus Group Meeting April 2013</p>	<p>Samancor will liaise with Union Mine in this regard, however the site will be powered by diesel generators.</p>
<p>What are Samancor's plans with regard to the access roads to the proposed mine? The main access road is a public road, but access is controlled by Union Mine due to security concerns. Samancor should assess the direct implication on safety, security, maintenance and the likely scale of operations in terms of traffic usage which will assist Samancor to quantify and qualify the best option for selecting a suitable access road.</p>	<p>Pier de Vries – Mineral Resource Manager Anglo Union Mine</p>	<p>Union Mine Focus Group Meeting Anglo Union Mine Office 14 April 2014</p>	<p>Samancor are considering alternative options and noted that constructing an alternate access route would entail construction of several bridges as the western access area has several streams which would need to be crossed. Anglo confirmed that they have a traffic management plan in place. It was agreed at the meeting that Samancor and Anglo would work together on finding an appropriate solution for both parties.</p>
<p>Please provide clarity on where water and power will be sourced from. Anglo confirmed that they do not have infrastructure in place to distribute water and power to other mines.</p>	<p>Pier de Vries – Mineral Resource Manager Anglo Union Mine</p>	<p>Union Mine Focus Group Meeting Anglo Union Mine Office 14 April 2014</p>	<p>It was agreed that Samancor and Anglo will consolidate their water use licensing and water management plans.</p> <p>A workshop has been set up for the end of May 2014 to see what synergies exist between the two mines. Samancor requested the following information from Anglo to ensure that they plan the proposed mine taking into consideration Anglo's existing mine:</p> <ul style="list-style-type: none"> <li>• Rehabilitation and closure plan;</li> <li>• Water use licence;</li> <li>• Borehole locations;</li> <li>• Integrated waste and water management plans (IWWMP); and</li> <li>• The current Environmental Management Plan for Union Mine.</li> </ul>



## COMMENT AND RESPONSE REPORT

ISSUE / COMMENT	COMMENTATOR	REFERENCE	RESPONSE
I would like to know the extent of the high walls; will they be thirty to forty metres high?	Johan Bekker Landowner	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	The high walls will be no more than 50m high.
<b>5.0 LIVELIHOOD</b>			
There are game farms, winter hunting businesses and guest houses in close proximity to the proposed mine, visual, noise and light disturbance could influence these businesses.	Allan and Sandra McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	The specialists will take these concerns into consideration when formulating mitigation measures.
Union Mine has planned two organic farms as part of their Social Responsibility on an area of Nooitgedacht, and have also applied for the use of four boreholes. Will this proposed mine affect these initiatives?	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting April 2013	Samancor will discuss the details with Union Mine relating to these projects and how they may be affected.
The grazing issue to be discussed between Samancor and the Baphalane ba Mantserre Leaders	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	Mr Desmond McManus of Samancor Chrome confirmed that this issue would be resolved in consultation with the Community before the grazing areas are affected by mining operations
<b>6.0 SOCIAL CONCERNS</b>			
The impact of an influx of work seekers in the area should be investigated. If mine workers get accommodated in the mine area, they usually bring their families and then stay in the area after decommissioning of the mine. This is a great concern to land owners in the area.	Sandra McGill, Nooitgedacht landowner	Nooitgedacht Collective Landowners Focus Group meeting April 2013	Thank you. The concern is noted. Samancor is investigating the possibility of contracting out the mining of the proposed area and may thus not establish a mine worker's village in the area.



## COMMENT AND RESPONSE REPORT

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Crime could increase with another mine in the area. Livestock get poached or mutilated. How will this be controlled?	Koekemoer family, Nooitgedacht landowners	Nooitgedacht Collective Landowners Focus Group meeting  April 2013	Mitigation measures to minimise the potential influx of job seekers will be formulated.
Will they do a pre-crack survey in the area before operation?	Mr Frans Moatshe, Baphalane ba Mantserre Community Development Trust	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	Yes, it is standard practice in any mining operation
Will Samancor take responsibility to the houses which will be cracked during blasting?	Ms Delina Mpete, Baphalane ba Mantserre Community Development Trust	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	If any structures are cracked due to Samancor's mining activities, the Company will take appropriate action with regard to effecting repairs or compensation
In terms of employment is Samancor looking for skilled or unskilled people?	Ms Delina Mpete, Baphalane ba Mantserre Community Development Trust,	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	The mining operation will require a mixture of skills
How were the figures of unemployment gathered?	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	From the latest census, the municipal IDP and consultation with municipal officials
I would like clarity on the socio-economic impact of this proposed project. The mine should consider local people for their workforce.	Sekete Mokoka Mantserre Village	Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014	Heather Booysen: This is dealt with in our SLP. The SLP covers a wide range of issues such as employee skills training, enterprise development and social investment. Samancor Chrome's SLP will align with the objectives and strategies of the Integrated Development Plan of the local and district municipalities and thereby contribute to socio-economic development in the area. Preference will be given to local people.



## COMMENT AND RESPONSE REPORT

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<p>Samancor Chrome can assist us by conducting a skills audit in our community and to train those that are not qualified.</p> <p>A task team has been established and there is close collaboration between the mine and this task team.</p>	<p>Kgosi Saltiel Ramokoka Mantserre Village</p>	<p>Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014</p>	<p>Thank you for this information</p>
<p>Once the mine is closed, what will happen to all those people that Samancor Chrome employs during operation?</p>	<p>Sandy McGill Landowner</p>	<p>Public Meeting - Baphalane-Ba-Mantserre Community Hall Wednesday, 16 April 2014</p>	<p>Heather Booysen: The SLP addresses this issue. Community based projects are identified through engagement and collaboration between the municipalities, local people and mine.</p> <p>A sustainable mine closure plan is envisaged by Samancor Chrome to ensure a positive socio-economic legacy. Mine closure planning includes labour transition for those who are dependent on the mine.</p>
<p>Due to the close proximity of the project to our community, I will appreciate local community safety and environmental safety.</p>	<p>Daniel Galeboye Mantserre Village</p>	<p>Written Comment 16 April 2014</p>	<p>Thank you for this comment we will strive to ensure that community and environmental safety is managed at all times.</p>
<p>I welcome the proposed mining project.</p> <p>I look forward to the advantages that the mining project can bestow on this community.</p>	<p>Daniel Galeboye Mantserre Village</p>	<p>Written Comment 16 April 2014</p>	<p>Thank you for this positive comment</p>
<p>I am currently studying electrical engineering and have level 2 and 3 NCV. I am in my last year of studies, doing level 4. I would like to be considered for employment. What are my chances?</p>	<p>Pity Manase Galeboye Mantserre Village</p>	<p>Written Comment 16 April 2014</p>	<p>Registered I&amp;APs will be informed when the approval of the authorities has been obtained for the project can go ahead. Samancor will inform local residents when personnel recruitment commences.</p>



## COMMENT AND RESPONSE REPORT

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I propose that before the company starts removing the top soil, the company should pay an amount of 20 million rand. This means that the community has 'knocked on the door' of the Mantserre Community. When the Rasimone Platinum Mine opened we were informed that an amount of 11 million rand would be in the bank account of the Bafokeng Community.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	A Social and Labour Plan (SLP), as required by the Mineral and Petroleum Resources Development Act, has been developed in consultation with potentially affected communities and local authorities. The SLP is designed to provide benefits to affected communities.  Compensation for temporary loss of usufruct will be negotiated with landowners/occupiers prior to the commencement of mining.
Skills training should be conducted with the intention of using workers from the community.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	Matters of this nature are addressed in the SLP
I would like Samancor to issue bursaries for the students who would like to go to university.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	Matters of this nature are addressed in the SLP
Youth should be employed from the Mantserre Village.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	Matters of this nature are addressed in the SLP
My specific expectation is that prior to the completion of the opencast mining, Samancor should plough back into the community of the Ba Mantserre Village.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	Matters of this nature are addressed in the SLP. Samancor will further engage with the local communities for the duration of the mining activities
There are many matters to be overcome in the community.	Ditlebe Petrus Monegi Community Member – Mantserre Village	Written Comment 23 April 2014	Samancor will engage with the local communities during the life of the mine





## COMMENT AND RESPONSE REPORT

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<b>7.0 PUBLIC PARTICIPATION</b>			
As affected community party we were not informed of the process	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	<p>The ward councillor for the area, Mrs Dorcas Taus was contacted in early April to arrange a meeting to inform the community leaders of the proposed project. On 16 April 2013 we made contact with Mr Saltiel Ramokoka and arranged a meeting with him for 25 April 2013. When we arrived at the community hall where the meeting was supposed to take place, we were told that Mr Ramokoka and his committee had been called away by the Mayor and would not be able to see us.</p> <p>In early May we did speak to the ward councillor again and she gave us an e-mail address of Chief Saltiel Ramokoka. On 10 May we sent Chief Ramokoka an e-mail where we once more explained the proposed project and requested comment from him. Nothing has been received back from Chief Ramokoka to date.</p> <p>An appointment was also made with the Baphalane ba Ramokoka and they also did not come to the meeting at the agreed time and place.</p>
How was it possible that the other I&APs were aware of the process and not Baphalane ba Mantserre	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	<p>It is suggested that this question should be directed to the ward councillor.</p> <p>Please see response above</p>



## COMMENT AND RESPONSE REPORT

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Advertisement was not placed in their local area	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	It would be appreciated if Mr Moatshe can inform us which newspaper people in the area read. Site notices were placed throughout the project area for people to read and where people were invited to contact the Public Participation office for more information or to request a meeting.
The public places where the reports were displayed were not accessible to them, because it was outside of their community. In the future reports to be placed at the Baphalane ba Mantserre reception, contact person is the Chief himself	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013	Copies of the draft EIA report will be made available at the Mantserre Community Hall and the next public meeting will be held at the Community Hall
Extension on the SR was requested by the Baphalane ba Mantserre until 28 June 2013	Mr Frans Moatshe, Baphalane ba Mantserre Community Development	Baphalane ba Mantserre Focus Group Meeting	This was agreed to by Samancor Chrome and Golder Associates
The Department of Rural Development and Land Reform (DRDLR) would like to convey its gratitude for being notified about the availability of the EIA and EMPR report. The documentation(s) sent has been perused on the given link(s).	Mr Khathu Muruba National Department of Rural Development and Land Reform	Written Comment 07 March 2016	Thank you for your comment. It is noted.



## COMMENT AND RESPONSE REPORT

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<p>Please ensure that comments from all relevant stakeholders are submitted to this office with the Environmental Impact Assessment Report (EIAR) and Environmental Management Programme (EMPr). This includes and is not limited to the South African Heritage Resources Authority (SAHRA), Department of Economic Development, Environment and Tourism (LEDET), Department of Agriculture, Forestry and Fisheries (DAFF) and Department of Water and Sanitation (DWS). Proof of correspondence with the various stakeholders must be included in the EIA Report. Should you be unable to obtain comments, proof of attempts that were made to obtain comments should be submitted.</p>	<p>Regional Manager: Mineral Regulation Department of Mineral Resources</p>	<p>Comment submitted 23 February 2016</p>	<p>This Comment and Response Report was updated throughout the course of the EIA and it is attached to the EIA/EMPr Report as Appendix F.</p>
<p><b>8.0 GENERAL</b></p>			
<p>Union Mine would like a map in the required format (AutoCAD) to superimpose onto their map, so that the overlap in infrastructure use can be seen clearly.</p>	<p>Pier de Vries – Mineral Resource Manager Anglo Union Mine</p>	<p>Union Mine Focus Group Meeting April 2013</p>	<p>Samancor will liaise with Union Mine in this regard and would have no problem supplying Union Mine with AutoCAD plans of the mine layout.</p>
<p>The green dotted line on one of the slides showed a water pipeline. Will Samancor take that into consideration</p>	<p>Chief Saliel Ramokoka, Baphalane ba Mantserre Community Development</p>	<p>Baphalane ba Mantserre Focus Group Meeting, Tuesday, 11 June 2013</p>	<p>Samancor will show due consideration for all infrastructure that will be affected by the proposed mining project</p>
<p>Please also provide Anglo with the generic information about the mine – when will mining commence, proposed construction phase, life of mine etc.</p>	<p>Pier de Vries – Mineral Resource Manager Anglo Union Mine</p>	<p>Union Mine Focus Group Meeting Anglo Union Mine Office 14 April 2014</p>	<p>Samancor will provide this by the end of May 2014.</p>



## COMMENT AND RESPONSE REPORT

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Samancor's contact information should be provided to the surrounding communities once mining commences	Pier de Vries – Mineral Resource Manager Anglo Union Mine	Union Mine Focus Group Meeting Anglo Union Mine Office 14 April 2014	Samancor will provide this information closer to the time of commencement of mining.
The Department does not have any objections at this stage to the application by SAMANCOR CHROME for mining right. However, in the interim the Department will conduct a verification process with the North West Land Claims office (for the farm portion: Varkensvlei 403 KQ) – to revert back to you as soon as possible.	Mr Khathu Muruba National Department of Rural Development and Land Reform	Written Comment 07 March 2016	Thank you, your efforts are appreciated.
According to our database of claims lodged prior 31st of December 1998, there is no land claim lodged on the below mentioned properties: • VARKENSVLEI 403 KQ However, it is possible that a claim for the property is registered with a different name in our database. Kindly note that there might be a possibility of the claim being lodged against any property due to ongoing new lodgement process that started from the 1st of July 2014 ending on the 30th of June 2019.	Mr L J Bogatsu Chief Director, Office of the Regional Land Claims Commissioner, North West Province	Written Comment 11 March 2016	Thank you for your prompt response, the contents of which are noted.
Please note I am also one of interested and affected parties and I would like to be registered as such as mining of this farm will negatively impact on my life now and in future. Secondly, I would like to know, when will stakeholders participation meetings take place as nothing had been discussed with relevant community structures regarding this mining deal	Cornelius Monene	6 September 2016	Thank you for your e-mail. You have now been registered. Several public meetings have been held during the course of the EIA. The most recent one, held on 20 July 2016 at Mantserre, was disrupted to such an extent that it was unable to continue. No further public meetings are being planned. Please provide any further comments by e-mail or letter.



## COMMENT AND RESPONSE REPORT

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<p>I am a mining and environmental lawyer and have been instructed by Potgieter Penzhorn Taute Attorneys in Pretoria per Carel Taute on instructions of the Baphalane Ba Mantserre Community Trust so as to assist them in their objection against the granting of the mining right over the property.</p> <p>Our instructions are to investigate further and to object to the entire process as it stands, based on information we have been provided with. We will appreciate if you will record the objection so long.</p> <p>Please provide us with all the necessary details so that we can direct our enquiries and actions in the right direction and to the correct address.</p>	<p>Elandre Bester</p>	<p>26 September 2016 by e-mail</p>	<p>All EIA documents can be downloaded from the Golder website <a href="http://www.golder.com/public">www.golder.com/public</a>. Enquiries may be directed to Ms Antoinette Pietersen of Golder's public participation office at tel. (011) 254 4805 fax 086 582 1561 or email: <a href="mailto:samancorv@golder.co.za">samancorv@golder.co.za</a>.</p>
<p>As appears from the scoping report, land belonging to residents of Mantserre will be required for the proposed open-cast mining activities. Our clients are therefore clearly interested and affected parties. Kindly direct all updates on the application process to <a href="mailto:richard@richardspoorinc.co.za">richard@richardspoorinc.co.za</a> and <a href="mailto:johan@richardspoorinc.co.za">johan@richardspoorinc.co.za</a>.</p> <p>Kindly also advise whether the scoping report has been accepted; what conditions, if any, have been imposed; and, if the scoping report has been accepted, what the status of the environmental impact assessment process is.</p> <p>We are also instructed to represent our clients in the consultation required by section 22(4)(b) of the MPRDA. Kindly advise whether your office is mandated to conduct such consultation. If it is not, kindly advise who we should contact in this regard.</p>	<p>Richard Spoor</p>	<p>Letter from Richard Spoor Inc. Attorneys dated 13 December 2016</p>	<p>Samancor Chrome has appointed Golder Associates Africa (Pty) Ltd as the independent environmental assessment practitioner for the EIA process. Golder has compiled an extensive database of community members and structures, with whom it is currently consulting in terms of the EIA Regulations GN R.982.</p> <p>In order to avoid unnecessary duplication and to properly respond to your letter, kindly provide us with the names of the relevant person or persons/committee or structure which mandated your firm.</p> <p>The DMR accepted the scoping report in a letter dated 12 January 2017. This letter will be attached to the EIA/EMPr report.</p>



**GOLDER ASSOCIATES AFRICA (PTY) LTD.**

A handwritten signature in black ink, appearing to read 'Etienne Roux'.

Etienne Roux  
Project Manager

LM/Im

Reg. No. 2002/007104/07

Directors: RGM Heath, MQ Mokulubete, SC Naidoo, GYW Ngoma

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