



SCOPING & EIA PROCESS

EIA PHASE KEY STAKEHOLDERS WORKSHOP

ENVIRONMENTAL AUTHORISATION PROCESS FOR THE PROPOSED DEVELOPMENT OF GELUK MINE, FARMS GELUK 512KS, GELUK OOS 513KS, IRONSTONE 847KS AT MAGNET HEIGHTS, WEST OF STEELPOORT, SEKHUKHUNE DISTRICT, LIMPOPO PROVINCE

DMR REF. LP 30/5/1/2/3/2/1/10107EM

Consultation with Key Stakeholders, State Departments and Authorities with jurisdiction in matters pertaining to the project within Makhuduthamaga Local Municipality & Greater Tubatse Local Municipality, Sekhukhune District Municipality of the Limpopo Province

KEY STAKEHOLDERS WORKSHOP MINUTES

FOR PROPOSED DEVELOPMENT OF GELUK MINE

HELD ON FRIDAY 4 DECEMBER 2015

AT 10:00 HRS – 13:00 HRS

MASANA LODGE, 99 JOHNSTON STREET, MOREGLOED, POLOKWANE

DATE OF COMPILATION: 7 DECEMBER 2015

PREPARED BY:

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LIST OF ABBREVIATIONS

It is imperative to firstly provide a list of abbreviations and their definitions to assist with the perusal of the document.

DRDLR: Department of Rural Development and Land Reform
DMR: Department of Mineral Resources
nl: Namely
EIA: Environmental Impact Assessment
KSW: Key Stakeholders Workshop
EIR: Environmental Impact Report
EMPr: Environmental Management Programme
EA: Environmental Authorisation
NEMA: National Environmental Management Act, 107 of 1998
RoM: Run of Mine
WML: Waste Management License
NEMWA: National Environmental Management Waste Act 59 of 2008
WULA / WUL: Water Use License Application / Water Use License
IWWMP: Integrated Water and Waste Management Plan
NWA: National Water Act 36 of 1998
DWS: Department of Water and Sanitation
DAFF: Department of Agriculture Forestry and Fisheries
LEDET: Limpopo Department of Economic Development, Environmental and Tourism
LIHRA: Limpopo Heritage Resources Agency
WWTP: Waste Water Treatment Plant
AEL: Air Emissions License

Tables:

Table 1: Comments and Issues raised at the KSW

Attachments:

Annexure A: Attendance Record for the KSW 4 December 2015

Annexure B: KSW Meeting Presentation

1. MEETING LOGISTICS (VENUE)

Rakhoma Mining Resources are applying for an Environmental Authorisation (EA) in support of a Mining Right Application to develop an iron-and vanadium ore mine to be known as “Geluk Mine”. The proposed farms under application are the farms Geluk 512KS, Geluk Oos 513KS and Ironstone 847KS located in the rural area of Magnet Heights some few kilometres south east of Jane Furse in the Sekhukhune District of Limpopo Province.

There are several infrastructure and environmental features within the application area which are regulated or administered by different spheres of government which requires their inputs in the project’s Environmental Impact Assessment (EIA) process. Their involvement will allow for informed decision making by the competent authority, Limpopo Department of Mineral Resources (DMR) and decisions made by the applicant Rakhoma Mining Resources.

The KEY STAKEHOLDERS WORKSHOP (KSW) is hosted as part of the public participation process of the 2nd phase of the EIA process to transfer technical project details to organs of state, state departments, organisations, agencies and service providers. It will assist the EIA project team in identifying key issues and impacts that need to be investigated as part of the EIA study.

The comments solicited during the KSW are included in the Environmental Impact Report (EIR) and Environmental Management Programme (EMPr) as part of the EIA study submitted to the DMR – Limpopo Province.

The KSW was arranged in Polokwane due to it being the seat to the majority of key stakeholders and authorities for Limpopo Province and the project.

VENUE	DATE	TIME
Masana Lodge, 99 Johnston Street, Moregloed, Polokwane	Friday 4 December 2015	10:00 hrs – 13:00hrs

2. WELCOME AND INTRODUCTION

Marissa Botha from Naledzi Group Pty Ltd welcomed all the stakeholders and thanked them for their attendance. She highlighted that the KSW has been arranged to discuss the Integrated Environmental Authorisation Process being undertaken in support of a Mining Right application for the proposed development of the Geluk Mine surface operation.

She indicated that the objectives of the KSW are to present the need and background information of the project to key stakeholders and authorities with jurisdiction in matters pertaining to the proposal. The EIA process being followed will be discussed including details of the baseline environment, specialist studies being undertaken. The KSW allows stakeholders the opportunity to get involved in the process and provide inputs to allow for informed decision making by the competent authority.

It was indicated that the meeting forms part of the 2nd phase of the EIA study and is referred to as an EIA Phase KSW. The KSW could not be scheduled during the Scoping Phase due to time frame constraints. The Scoping Phase was already completed in September 2015.

The attendees at the meeting were provided an opportunity to introduce themselves and state their interest in the project.

3. THE AGENDA

The agenda and purpose of the meeting was circulated as part of the KSW Invitations. It was provided as a leaflet to attendees with commencement of the meeting. The agenda was as follows:

- a) Purpose of the Key Stakeholders Workshop
- b) Structure of Workshop
- c) Background and need for the project
- d) Project Locality
- e) The EIA Process
- f) Project Locality
- g) Project Description
- h) Baseline Environment
- i) Specialist Studies undertaken
- j) General Discussions
- k) Close of Meeting

4. PROJECT TEAM

Mrs. Botha explained that Rakhoma Mining Resources has applied for an EA in terms of the National Environmental Management Act 107 of 1998 (NEMA) at the same time of applying for a Mining Right Application to mine iron-and vanadium ore. The applications were submitted to DMR in July 2015. Naledzi Group Pty Ltd has been appointed as the independent environmental assessment practitioner to conduct the EIA process as well as other applicable licenses required for the proposed "Geluk Mine" surface operation nl.

- Water Use License Application
- Waste Management License

She indicated that the applicant Rakhoma Mining Resources would be represented at the meeting by Mrs. Mbavhi Ngobeni – Company Secretary, who will join the meeting later. She further indicated the contracted mine engineer for the project is 4 Arrows Mining and Engineering who will be represented by Mr. Vongani Mathebula who would also join the meeting later that day.

It was explained that Rakhoma Mining Resources is majority owned by Vanchem Vanadium Products Pty Ltd. The remaining equity of the company lies with BEMP and a proposed community trust.

The proposed Geluk Mine surface operation would be a small scale mine with only one customer, Vanchem Vanadium Products Pty Ltd. Vanchem is a vanadium producer with processing plants in

Ferrobank Witbank. Vanchem's processing plant needs raw ore to produce vanadium which is used to create alloys, ceramics, paints, plastics etc. Vanchem is securing its own ore requirements through Rakhoma in obtaining a Mining license and development of Geluk Mine. Rakhoma will extract low-grade raw ore, Vanadium bearing titaniferous magnetite from Geluk Mine which would be shipped to Vanchems Processing Plant in Witbank.

5. NEED FOR THE PROJECT

Marissa Botha from Naledzi Group indicated that Vanchem requires 20 kilo tons of raw ore per month to operate their vanadium processing plant in Witbank. Nonetheless, there is currently no ore supply and the plant is not operational as a result.

Vanchem has a supply agreement with Mapochs Mine in Roossenekal to deliver ore fines. Mapochs on the other hand is under business rescue and no fine ore is being shipped to Vanchem at this point. A source of ore is urgently required to resume Vanchems vanadium processing. With the application for a Mining Right Vanchem is securing its own ore requirements through Rakhoma.

6. BACKGROUND & LOCALITY OF THE PROJECT

It was indicated by Mrs. Botha that the application area comprises the farms Geluk 512KS, Geluk Oos 513KS and Ironstone 847KS. She indicated that Rakhoma presently holds a Mining Permit for the farm Geluk 512KS and at the same time is finalising a mining right application for the neighbouring properties. Exploration drilling has been undertaken and determined the extent of a feasible reserve or ore deposit available on the farm Geluk.

The application area is 3165 hectares and located in both Makhuduthamaga Local Municipality and Greater Tubatse Local Municipality. The land is state owned and managed by the Limpopo DRDLR and has been allocated to three tribes. The area is populated in its northern extent by Ga-Mogashoa village and in its southern extent by Maphopha Village and Geluk farm informal settlement. It is located some 10km south east of Jane Furse and 20km west of Steelpoort town.

A 500m mining restriction area will be implemented to settlements.

7. PROPOSED GELUK MINE MINING METHOD

The proposed mine will be a surface operation consisting of strip mining and simultaneous rehabilitation. The ore deposit is close to surface and the maximum mining depth anticipated is 20m. Strips of 20m deep and 20m wide will be mined.

The ore body comprises large fault blocks which need to be drilled and blasted into smaller chunks of ore to transport to the Run of Mine (RoM).

The proposed Geluk Mine will produce a raw ore product through a dry mining process. The basic mining method would comprise:

- Clearing of land / vegetation and opening up mining strips. The topsoil and overburden would be stored next to the mining pit;
- From here the exposed ore blocks will be drill and blasted to reduce its size;
- The blasted ore will be loaded and hauled to the RoM;
- The RoM will be crushed and screened through a mobile plant mainly for size reduction;
- From the Crushing and Screening Plant the ore will be moved to the final Product Stockpile;
- From the final Product Stockpile raw ore will be loaded onto 34 ton Inter-link tipper trucks and transported to the Roessekenal Rail siding product stockpile for loading and shipment via train to Witbank;
- Once the mining pit (strips) have been depleted, it will be backfilled with the stored overburden and ore fines as part of the simultaneous rehabilitation plan;
- Toe trenches and silt traps will be built below mine pits to stop run-off water and siltation draining into water features and the river.
- Only unoccupied areas will be mined. No resettlement of residential units/communities is required.

8. MINE INFRASTRUCTURE

Mrs. Botha indicated that the Geluk Mine as indicated will be a small scale mine. It will not reach the size or capacity of the other platinum and chrome mines of the Steelpoort area. Its production rate in year 1-5 years will be 240 000 tons/annum and in year 6 the production will ramp up to 700 000 tons/annum. The production per month in year 1-5 will be 20 000 tons.

The Life of Mine will be 30 years. The mine will start small with 30 employees and later increase to 50 when in full production. It will operate in year 1-5 on 1 day shift and by year 6 operate on a day and nights shift. Shifts will be 8 hours each.

The mine infrastructure will be limited to Geluk farm and will comprise the following:

- Access road from the D2219 Jane Furse Road
- A Weighbridge, office and workshop
- RoM and Final Product Stockpile
- There will be 1 permanent haulage road from the workshop and initial mine pit area to the final product stockpile. The haulage road would cross the Shakwaneng River once. The rest of roads to be created would be temporary haulage roads;

- Crushing Stock area and mobile Crushing and Screening Plant which will move as mining progresses

During the mining process all the ore will be blasted and drilled as well as crushed and screened. As indicted product will be transported by interlink tipper trucks via R555 to Roosenekal Railsiding. This is an existing siding. The haulage distance is approximately 40km. It is anticipated that about 27 trips will be made per day initial mining. During full production the daily trips will increase to 77 trips/day. A product stockpile will be created at the Roosenekal rail siding of about 2500 square metres.

All the overburden storage piles, topsoil piles, fine ores from the crushing and screening plant will be backfilled into mine pits.

In terms of electricity supply the mine will operate at first on diesel generators to be used for the office, workshop and weighbridge. The Crushing and Screening Plant is diesel powered. In later stages the mine will connect to Eskom infrastructure through a substation on the mine site.

9. LEGAL REQUIREMENTS FOR THE PROJECT

Marissa Botha indicated that an EA is required in terms of the NEMA and the EIA Regulations of 2014 as the project triggers Activity 17 under Government Notice R984 which states “any activity and its operation requiring a Mining Right in terms of Section 22 of the Mineral Petroleum and Resource Development Act 28/2002 requires EA through a full Scoping and EIA process.

The application for EA was submitted to Limpopo DMR and a project reference number was allocated as LP: 30/5/1/2/3/2/1/10107EM.

The project also requires a Waste Management License (WML) in terms of the National Environmental Management Waste Act 59/2008 (NEM:WA) due to the creation of possible residue stockpiles resulting from the mining activities. The activity requires undertaking a Full Scoping and EIA process and was therefore integrated from onset with the EA application process.

Naledzi Group together with the mine engineer will confirm the need for the WML as it is being indicated that overburden will be removed from the mining pit and mining strips will later be backfilled again as part of progressive rehabilitation. This does not constitute the need for a license yet if the mine decides not to backfill the pits with overburden then the piles become residue piles.

The project also requires a Water Use License Application (WULA) and Integrated Water and Waste Management Plan (IWWMP) in terms of the National Water Act 36/1998 (NWA). The WULA will be submitted to Department of Water and Sanitation (DWS). The Section 21 water uses that will be required for the project include:

- Section 21 (a) Taking water from a water resource (taking water from boreholes)
- Section 21 (b) Storing of water (clean water in jojo tanks and then potential storage dams if dewatering of mine pits are required);

- Section 21 (c) Impeding and diverting the flow of a watercourse (stream crossing, wetlands in application area)
- Section 21 (i) Altering the bed and banks or watercourse (stream crossing, wetlands in application area);
- Section 21 (g) Disposing of waste in a manner which may detrimentally impact on a water resource (dust suppression and storage of stockpile waste water if any);
- Section 21 (j) Removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people (dewater of mining strips if necessary)
- NWA also requires that an Integrated Water and Waste Management Plan be prepared for the project

It is anticipated that the WULA will be submitted to DWS when the Final EIR is submitted to DMR during April 2016.

10. EIA PROCESS

Mrs. Botha explained that a full Scoping and EIA process is being undertaken. The process entails two phases, a Scoping phase and EIA phase.

The Scoping Phase aims to gather information of the project site and identify potential impacts/issues through public consultation. Issues identified and comments received are then incorporated into a Scoping Report and Plan of Study for EIA which sets out the issues to focus the specialist investigations and Environmental Impact Phase on.

The findings of the information gathering phase and public participation, specialist investigations as well as site assessments are consolidated in an EIR and EMPr.

The Scoping Phase of the EIA study kicked off with information gathering and public participation. The following tasks were undertaken during the 1st phase:

- gave notice to the public of the project during August 2015
- placed site notices on site and advertised the project in the local newspaper
- distributed background information documents and notification letters to landowners, interested and affected parties, tribal authorities, local authorities, district authorities and organs of state with jurisdiction to matters pertaining to the project;
- A Draft Scoping Report was prepared for the project during August 2015 and submitted to organs of state for comment and place at public venues for review by the public;
- The final Scoping Report was submitted to DMR in September 2015 and they authorised the continuation to the EIA phase in October 2015.

The project EIA study is currently in the 2nd phase during which the specialist studies are undertaken and public consultation. Next the EIR & EMPr will be prepared. It will be made available for public review for 30 days. The anticipated date for public review is during February – March 2016.

The report will be available at public venues and will be hand delivered to key stakeholders for comment. It is very important for departments to note that the new EIA Regulations of 2014 only allows 30 days for comment on environmental reports. There are no more 40 day commenting periods. If comment is not submitted in 30 days it is considered there are none.

The KSW forms part of the EIA phase of the study in which we are soliciting comments from stakeholders and authorities which were not forthcoming during the Scoping Phase. If any comments arise from the KSW that need to be taken into consideration by the EIA team there is still sufficient time to address it.

The final EIR will be submitted to DMR during April 2016. The application for WULA will be submitted in April 2016 post pre-application meetings with DWS to determine the exact water uses and documentation required as part of the WULA.

DMR will have 107 days to review the EIR&EMPr and reach a decision on the application. The EA is expected in August 2016. Stakeholders and the public will be notified of decision through newspaper advertisements and notification letters.

The time frame for issuance of WUL is underdetermined. It depends entirely on DWS.

11. PUBLIC PARTICIPATION PROCESS

Marissa Botha only briefly discussed the public participation process being undertaken for the EIA study of the proposed mine. The outline of the public consultation undertaken during the Scoping Phase and to be undertaken during the EIA phase is contained in the attached KSW presentation under Annexure B.

12. BASELINE ENVIRONMENT

Marissa Botha explained that the proposed application area is mountainous in nature, has an undulating landscape with a shallow valley associated with the Shakwaneng river meandering through the project area.

In terms of Geology the site is located within the Eastern Lobe of the Bushveld Igneous Complex, ore body forms part of a vanadium-bearing titaniferous magnetite deposit that occurs in the Upper Zone of the BIC. Four prominent magnetite layers on the study site represented in seams nl. main, first, second and third seam. The soils on site area shallow, rocky and clayed.

The Shakwaneng River drains from north to south through site. There are several drainage patterns from the hill slopes. There is a storage dam, Dr Eiselen Dam in the southern extent of the farm Ironstone.

The Geohydrological conditions on site are yet to be established through a Ground Water Impact Assessment Study. This study is being undertaken at present. It is anticipated that groundwater would flow toward Shakwaneng River.

It is important to note that the site cover is Sekhukhune Mountain Bushveld forming part of the Sekhukhune Mountain lands (Centre of Endemism) which is Endangered Ecosystem. According to the Limpopo Conservation Plan the site corresponds to both a Critical Biodiversity Area and Ecological Support Area. It is anticipated that the CBA would be the mountain slopes and hills; the ESA corresponding to the river.

Of significance is that there are several protected tree species on the application area that would need to be removed as part of the land clearing to create the mine pits and mine infrastructure. Protected Tree permit applications would need to be submitted to Department of Agriculture, Forestry and Fisheries for approval to allow lawful removal thereof. It may be necessary to apply for permits according to the mine schedule, in phases.

The site is predominantly rural in nature with low background noise levels. No baseline data exists for the project sites air quality. The air quality is considered to be fairly good. Primary sources of air pollution in the area include dust from unpaved roads, vehicle movements, and domestic fuel burning from rural households.

13. POTENTIAL ISSUES

Marissa Botha indicated that potential issues identified for the proposed mine operation includes:

- Impact from Drilling and Blasting: There are schools, residences and road infrastructure close to mining area, 500m restriction to mining to be applied to populated areas. Safety zones would be required for reduction of flyrock and ground vibration
- There is a potential for surface water pollution of which siltation of watercourses is focussed on;
- The usage and increase of interlink trucks along the D2219 and R555 will have an impact on traffic in terms of road, pedestrian safety, degradation of the road infrastructure may take place and also the potential impact of the transportation of the ore via the Steelbridge over the Steelpoort River;
- There may potentially be an impact on cultural and heritage sources;
- Impact on air quality due to dustfall out resultant from dust plumes from blasting activities, transportation of ore along haulage routes and traffic over unpaved roads;

- Impact on the socio-economic environment;
- Potential health and safety impacts
- Impact on fauna and flora due to destruction of vegetation and habitat fragmentation during clearing land;
- The strip mining and specifically the rehabilitation and landscaping of pits will have an impact on the topography (higher terrain than before mining);
- There may potentially be impact on groundwater from potential leachate from spoil piles;
- Potential impact on wetlands and other aquatic systems due to siltation and potential destruction.

14. SPECIALIST STUDIES BEING UNDERTAKEN AS PART OF THE EIA PROCESS

Mrs. Botha indicated that based on the identified potential issues and the characteristics of the project site the following specialist studies are being undertaken as part of the EIA study:

Archaeology and Heritage Impact Assessment;

- Social and Economic Impact Assessment;
- Soil and Land Use Impact Assessment;
- Noise and Vibration Impact Assessment;
- Air Quality Impact Assessment;
- Terrestrial Ecological Impact Assessment;
- Aquatic Ecological Impact Assessment;
- Surface Water (Hydrology) Impact Assessment;
- Ground Water (Geohydrology) Impact Assessment;
- Traffic Impact Assessment;
- Geochemistry Impact Assessment
- Visual Impact Assessment;
- Closure/Rehabilitation Plan;
- Integrated Water and Waste Management Plan (IWWMP).

The specialists are conducting the studies during December 2015 and January 2016.

15. DISCUSSION SESSION

Marissa then welcomed questions, comments and queries from the attendees. Please find below a summary of the questions, comments and queries as posed and the accompanying responses.

Table 1: Comments and Response at KSW

NO	Comment	Commenter	Date	Response
1	I am confused as to the mine being referred to as a small scale mine, yet it will have a 30 years Life of Mine?	Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency	4 December 2015	Marissa Botha from Naledzi Group indicated that the mine will only have one client, Vanchem. It will start as a small scale mine with only 30 employees and later increase to 50 employees. It will never reach the size of the platinum and chrome mines in the Steelpoort area, thus referred to as a small scale mine.
2	Are there any wetlands on the application area? If so will it be mined as part of the mine schedule area?	Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that there are several wetlands and drainage features on the application area corresponding to the Shakwaneng River and hill slopes. There are several drainage features channelling water from the mountains towards the river.</p> <p>An Aquatic Ecology Impact Assessment Study is being conducted as part of the specialist studies for the EIA study. The assessment includes identifying any wetlands, its delineation and it will also characterise the wetlands and its importance.</p> <p>The Dr Eiselen Dam and wetland in the southern extent of the application area</p>

				<p>will not be damaged.</p> <p>Any wetlands identified within the mining schedule area will need to be conserved as they control the flow of rainwater/drainage from the mountains into the river. It will be delineated and buffer zones recommended.</p> <p>A flood line determination of the Shakwaneng River will also be undertaken as part of the Surface Water Impact Assessment.</p>
3	<p>Will there be any mining activities through the river?</p> <p>The mine layout plan must include all infrastructures and the mine schedule plan for the entire mining right. This is the only way DWS can determine that all water uses are identified and included on the WULA.</p>	<p>Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency</p>	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that there will be 1 permanent haulage road on the farm Geluk 512KS which will be constructed. The road will cross the Shakwaneng River once.</p> <p>There is a mine infrastructure plan for the farm Geluk which indicates where the haulage road will cross the river. An infrastructure and mine plan for the Mining Right area will be included in the EIR.</p>
4	<p>With what will the mine contractors backfill the mine pits? The overburden or waste rock?</p>	<p>Mr. Adam Ramalisa Department of Water and</p>	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that the mine pits will be backfilled with the ore fines left from crushing and screening and the</p>

	<p>DWS has no issue if the overburden is used for backfill, yet if the waste rock (ore fines) which has been in contact with explosive are used to backfill there would be certain issues.</p> <p>A leachate test would need to determine the potential for contamination from the fine ores (waste ore). The test should not pertain to the overburden but the waste rock to assist DWS.</p>	Sanitation, Olifants Catchment Agency		<p>overburden. The mine engineer has indicated that the overburden would be stored next to the mine pit. All the ore blasted will be crushed and screened and taken to the Final Product Stockpile for shipment to Vanchem. There will be ore fines left after crushing and screening that will also be backfilled into the pit as part of rehabilitation.</p> <p>A Geochemistry Assessment is being undertaken as part of the specialist studies.</p>
5	I am not sure if Naledzi is going to facilitate the appointment of other specialists as well, but we would like to have inputs in the Terms of Reference for the specialist studies.	Mr Donald Lithole Limpopo Heritage Resources Agency (LIHRA)	4 December 2015	<p>Marissa Botha from Naledzi Group indicated they do facilitate the appointment of specialists. It has already been done for the project. Furthermore the Draft Scoping Report and Plan of Study for EIA was hand delivered to all the authorities and state departments including LIHRA for review and comment in August 2015. The report included the Terms of Reference for Specialist Studies which was available for inputs. We received no inputs in this regard.</p> <p>The specialists are currently in the field and will be drafting their reports. If there are any issues that need to be taken into consideration it can be conveyed to them. This is also the objective of the KSW at this</p>

				stage, as no inputs were forthcoming during the Scoping Phase.
6	<p>It has been indicated that there are 25 Chiefs with joint jurisdiction on the proposed mining right area. I believe that each and every one has their own cultural believe system that is unique. LIHRA would require the inclusion of an Anthropological Assessment as part of the Heritage Impact Assessment.</p> <p>There may be rituals and cleansing of the site and graves by these 25 main role players that need to be assessed and considered. If it is not considered and addressed it can cause unnecessary community issues.</p>	Mr Donald Lithole LIHRA	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that the proposed mining right area is state owned and under management by Limpopo DRDLR. It has been allocated to three tribes. Rakhoma Mining Resources have been in direct consultations with the tribes and chiefs affected by the project.</p> <p>Mbavhi Ngobeni from Rakhoma Mining Resources indicated that all the chiefs are familiar with one another. They are related as some are brothers and both chiefs for example. Unfortunately the chieftaincy is not as structured as in other areas in that there is a paramount chief and indunas. Their structure is not that clear at this point.</p> <p>As a company we took the approach of an all-inclusive consultation strategy. We are more than willing to engage with all the chiefs of the area. But it terms of the project site only 3 tribes have allocation rights to the farms and have the right to use the land. These are the directly affected chiefs.</p> <p>The farm Geluk 512KS is purely</p>

			<p>government owned. But the farm Ironstone has been gazetted and allocated to the three tribes. Rakhoma would then bring in those three chiefs and the Department of Rural Affairs in terms of what they would require to step into a lease agreement Rakhoma and Rakhoma with the tribes. We would therefore enter into an agreement with the three chiefs, but the other chiefs are purely part of an all-inclusive consultation to ensure that nobody feels left out.</p> <p>Mrs. Botha added that consultations with the chiefs are still ongoing and conducted in a one on one basis between Rakhoma and the community/ chiefs representatives. Naledzi Group has not had any focus group meetings with the structures as we await a go ahead from them to consult them in terms of the EIA process. We are trying to honour their structure of consultations. We hope by January 2016 the chiefs would give consent for us to engage with the them and community.</p> <p>In terms of your request for an Anthropology Assessment, Mr Eric Mathoho is the appointed Heritage Specialist. Naledzi Group will discuss your</p>
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				request with him for inclusion as part of the assessment.
7	<p>I think in this projects case you need to distinguish between Landowners and Land users which are on site. There may be people who previously lived / used the site who no longer live on site anymore. If we make the mistake on consulting the wrong parties there is a risk.</p> <p>At Medupi Power Station, the consultants focussed on the people who were occupying the site at the time and took a blind side on people who resettled from the site to another area. Those resettled people come back to their land to find the proposed power station. We must try to counter such things.</p>	Mr Donald Lithole Limpopo Heritage Resources Agency	4 December 2015	Ms Mbavhi Ngobeni from Rakhoma Mining Resources noted the comment.
8	How far does the ore reserve or deposit stretch on the proposed mining right area? It is indicated that mining will take place in strips of 20 wide and a maximum depth of 20m. But to what extent will the area be mined?	Mr Donald Lithole Limpopo Heritage Resources Agency	4 December 2015	<p>Marissa Botha from Naledzi indicated that the ore deposit has been estimated and confirmed to occur on the entire farm Geluk 512KS. The ore body is close to surface, thus a surface mine is proposed.</p> <p>There are areas where the ore body outcrops on the farm or is either 3m below surface. The resource estimation was however done only for the farm Geluk and the life of mine (30 years) is based on Geluk farms resource estimation.</p> <p>The farm Ironstone 847KS has not been explored yet.</p>

9	Is there any other mines operation in the area with mining rights on the application area?	Mr Donald Lithole LIHRA	4 December 2015	<p>Mbavhi Ngobeni from Rakhoma indicated that it depends on the minerals available on site. Rakhoma conducted a study to determine whether there were any other minerals available on site aside from iron ore. Yet when there is a reserve of iron ore there are no other by products/minerals like with platinum and chrome.</p> <p>DMR indicates to applicants on their application acceptance letters if there are any other stakeholders or applicants on the property which need to be consulted. When DMR accepted Rakhoma's application for Mining Right they did not specify any other applicants on the property which need to be consulted. So far Rakhoma are the only right holders of the iron ore on the application area.</p> <p>Marissa Botha from Naledzi Group added that as part of the public participation process other mines of the local area are being consulted. You would find that already established mines in the area</p>
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				<p>usually have mining rights on other properties in the regional area.</p> <p>If referring to the KSW invitee list, other mines of the local area were invited to determine if any of their rights are affected or potential infrastructure plans.</p> <p>Mbavhi Ngobeni added that the closest mine to the application site is approx. 15km.</p>
10	<p>There are two tree species that will occur on the application area nl. Cartha Edulis and Cartha Transvalensis (Lydenburgia assinoides). Please note these two species are confined to the Sekhukhune Mountain lands. DAFF will need a report indicating the potential impact on these trees.</p> <p>Please also note that license permits are mostly valid for 2 years.</p> <p>Yes it would be acceptable to apply in phases but the report must state the holistic impact on these species.</p> <p>We are also concerned of the impact on natural forests that may occur on the application area. This needs to be identified and addressed in the specialist ecological assessment.</p>	Thapelo Machate Department of Agricultural, Forestry and Fisheries (DAFF) Forestry Regulation	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that an Ecological Impact Assessment is being undertaken as part of the EIA study which will determine the impact of the mine activities on the protected trees, vegetation, determine if there are any natural forests.</p> <p>Can it be suggested that permits are applied for in phases according to the mining schedule?</p> <p>Mbavhi Ngobeni added that it can be included in the operational phase for the EMPr that permits are only valid for two</p>

				years and can be applied for in phases.
11	<p>It is indicated that the mine will have 30 employees in its initial mine production and later increase to 50 employees. Where will the mine source water for these employees?</p> <p>Please make sure that the water you apply for at DWS will sustain your water requirements for the entire life of mine. DWS do not easily amend the water use license permits. Do not apply for low volume of water if you know you will require high volumes in 20 years time. Apply for the bulk requirement foreseen to be required for the life of mine from onset.</p>	<p>Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency</p>	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that the mine will source water from boreholes to be drilled on the farm Geluk 512KS for domestic purposes. It is indicated in the Mining Works Programme that the mine requires 3000 litres per day for these purposes.</p> <p>Mr Vongani Mathebula, Mine Engineer for Four Arrows Mining Engineers (also mine contractors) indicated that they intend drilling 2 boreholes in the 1st year of operation. Accordingly 2 JoJo storage tanks will be set up to store the water. The borehole water will be used for domestic purposes, drilling activities and dust suppression.</p>
12	How will the mine contractor provide sanitation on site?	<p>Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency</p>	4 December 2015	<p>Vongani Mathebula from Four Arrows Mining Engineers indicated that the entire mine will be operated by different contractors. Four Arrows intend using mobile chemical toilets for sanitation for example Talisman Hire mobile toilets.</p>

	<p>Please note that DWS wants a copy of the service agreements Rakhoma or the mining contractor will have in terms of sanitation etc or for any services in this regard. We don't want to find that you indicate at the meeting a service provider will provide chemical toilets and remove effluent to a waste water treatment plant and find that the effluent is dumped and polluting the river.</p> <p>When do you anticipate submitting the Application for Water Use License? Only by the time Rakhoma receives their Environmental Authorisation from DMR?</p>			<p>The mine process will consists contractors for each activity:</p> <ul style="list-style-type: none"> • Drilling and blasting • Loading and hauling • Crushing and Screening and take product to the final product stockpiles • Transportation of the product to the Roosekenal Railsiding. • Sanitation provision • Mobile offices etc <p>Marissa Botha from Naledzi indicated that the WULA will be prepared and submitted by end of April 2016. Once the Draft EIR is available the WULA will be prepared based on the water uses stipulated in the report and mine infrastructure plan.</p>
13	Let me just explain why the proposed Geluk Mine will and is going to be rather small and has limited potential of becoming a	Mbavhi Ngobeni Rakhoma Mining Resources	4 December 2015	Noted.

<p>large scale mine.</p> <p>The product Vanchem / Rakhoma is looking for is the vanadium in the iron ore. At the moment Vanchem is supplied by Mapochs Mine at Roossenekal. Mapochs Mine is a larger mine, that what Rakhoma is proposing, yet still a smaller scale mine. Mapochs currently supplies Evraz Highveld Steel and Vanchem. In South Africa this product only has 3 potential customers:</p> <ul style="list-style-type: none"> • Vanchem • Highveld Steel • Rhovan <p>Rhovan has their own mine known as Rhovan Vanadium Mine (Xstrata Alloys) in the Brits Area.</p> <p>So the material will only go to one potential customer which is Vanchem and can therefore never really grow into a big mine operation. The chance of this market also growing is very limited.</p> <p>The reason also for the proposed Geluk Mine being small in its initial stages is that Vanchem currently still has a supply agreement with Mapochs Mine which cannot be stopped for the next 5 years. The supply agreement must first expire. Only once the supply agreement with Mapochs Mine expires can Geluk Mine fully supply Vanchems ore requirements.</p> <p>It will be evident from the supply tonnages set out in the Mining Works Programme that for the first 5 years of Geluk Mine</p>			
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	operation the tonnages would be 240 000 tons/annum. After year 5, the contract with Mapochs Mine would have ended then Rakhoma through Geluk Mine will supply Vanchem with their total ore requirement ramping mine production to 700 000tons/annum.			
14	<p>Just to get some clarity in terms of the Section 21 (b) water use license which pertains to Storing of Water:</p> <p>For what will Rakhoma require this Section 21 (b) water use?</p> <p>Will it be for borehole water stored in tanks or control dams?</p>	Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency	4 December 2015	<p>Marissa Botha indicated that water abstracted for the boreholes for domestic purposes will be stored in 2 JOJO tanks.</p> <p>Also, if according to the Geohydrological Assessment being undertaken it is determined that during mining the contractors will mine into the groundwater table there would be a need to remove the water from the mine pit and pump it into control dams/dam.</p> <p>Yet the need for such is still to be determined by Geohydrology Assessment.</p>
15	I arrived later at the meeting. Can you just confirm with me where is this mine being proposed?	Xander Neethling Eskom Distribution Northern Region: Land Development	4 December 2015	Marissa Botha indicated that proposed application area is located some 20km west of Steelpoort in the area of Jane Furse on the farms Geluk 512KS, Geluk Oos 513KS and Ironstone 847KS. When traveling on the R555 Steelpoort / Stoffberg Road there is a turn off to the left onto the D2219 Jane Furse Road with a Steelbridge over the Steelpoort River;

	<p>Yes, I am familiar with the area and know where the application area is located now. Where will the electricity supply for the mine come from?</p> <p>So during construction phase the electricity demand would not be high. What about during production?</p> <p>So Rakhoma's maximum required electricity supply would be</p>			<p>once on the D2219 road you pass Maphopha village then you reach a large natural area on your left and right and side of the road which is the proposed application area.</p> <p>She indicated that in the initial stages of mining the mine contractor will use Diesel Generators for the office, weighbridge and workshop. The other components of the mine such as the Crusher and Screener plant are mobile diesel powered machines. The mine will require low electricity supply and usage. Later the mine would require an Eskom substation and infrastructure for the offices, weighbridge and workshop area.</p> <p>Vongani Mathebula of Four Arrows Mining indicated that the electricity requirements during operation would also be low. The mine will require electricity for the mobile office, weighbridge, and workshop area.</p> <p>Post Meeting Note: The EIA Study for the</p>
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	<p>medium voltage 22kV with a transformer.</p> <p>Has a substation required for the mine been included in the EIA process?</p>			<p>proposed Geluk Mine does not include the assessment of the required Eskom substation.</p>
16	<p>Please note that we are also concerned whether there are any natural forests on the application area. We want Naledzi to also consider other legislation. We would like a site visit to the application area before making comment on the project.</p> <p>We would like to then conduct the site visit in February 2016 once we have received the Draft EIR for comment!</p>	<p>Thapelo Machate Department of Agricultural, Forestry and Fisheries (DAFF) Forestry Regulation</p>	<p>4 December 2015</p>	<p>Noted. Marissa Botha from Naledzi indicated that Naledzi is available for a site visit either in December 2015 or January 2016. The Draft EIR will be submitted for comment to DAFF by February 2016. When will DAFF be available for a site visit?</p> <p>We will arrange a site visit accordingly.</p>
17	<p>I would also like to request a site visit with the specialist conducting the Heritage Impact Assessment for the proposed project. Maybe the site visit can be conducted with the specialists.</p>	<p>Mr Donald Lithole Limpopo Heritage Resources Agency</p>	<p>4 December 2015</p>	<p>Marissa Botha from Naledzi indicated that she would submit the request to Eric Mathoho who is the Heritage Consultant conducting the specialist study.</p>
18	<p>We have no objection to the EIA Process. We are concerned with the physical construction of the access road to the mine site.</p> <p>Limpopo Roads Agency will wait for the Traffic Impact Assessment (TIA) conducted as part of the EIA study. Once received we would issue the conditions for access road</p>	<p>Phuti Montjane Limpopo Roads Agency</p>	<p>4 December 2015</p>	<p>Noted. A Traffic Impact Assessment is being conducted as part of the EIA Study it focuses on both the new access road proposed to the mine, haulage route from the mine to the Roosenekal railsiding,</p>

	<p>construction.</p> <p>There will be a traffic impact on the steelbridge over the Steelpoort River and the road infrastructure. We will review the TIA.</p> <p>Access road approval will be required from Limpopo Roads Agency.</p>			<p>including the Steelbridge over the Steelpoort River.</p>
19	<p>Let it be clear that the applicant Rakhoma Mining Resources must sign the WULA application forms, include the ID of the company representative and details as requested as per the WULA pre-application meeting between Naledzi and DWS.</p> <p>DWS also requires some form of security of land tenure such as a title deed to be included as part of the WULA. If it is a lease agreement include any proof of application for such.</p> <p>Noted. If ever there is an application/request for or lease agreement with regards to the proposed Mining Right areas which indicated Rakhoma is trying to secure land tenure then a copy of such documents must be submitted to DWS.</p> <p>DWS would like to sit down with the applicant before the</p>	<p>Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>4 December 2015</p>	<p>Marissa Botha from Naledzi indicated that the documents requested by DWS at the pre-application meeting have been gathered. We have indicated to Rakhoma that they must sign the forms.</p> <p>Mbavhi Ngobeni from Rakhoma indicated that Rakhoma cannot apply for a lease agreement from the Department of Rural Development Land Reform without the Mining Right from Department of Mineral Resources.</p> <p>Marissa Botha indicated that the WULA specialist/Naledzi along with Rakhoma the applicant will consult DWS through a pre-application submission meeting to come and discuss the drafted WULA to ensure</p>

	application is submitted. This will allow DWS to site with the applicant and unpack all the permits required for the project. DWS do not accept documents that are incomplete.			that the document contains all the minimum requirements and is complete before submission.
20	Please also submit the details of the details of the Waste Management License as part of the EIR to DWS. Please also submit the comments received from other departments on the EIR to us so as to fast track the WULA process.	Mr. Adam Ramalisa Department of Water and Sanitation, Olifants Catchment Agency	4 December 2015	Marissa Botha indicated that the Environmental Authorisation and Waste Management License is an integrated process and both are addressed in the EIR. The draft EIR will be circulated for public review and for comment to organs of state. A 30 day commenting period is provided for in terms of the new EIA Regulations 2014 time frame. Post the 30 days the comments received from departments will be incorporated into the EIR as a final version and submitted to Department of Mineral Resources and also to Department of Water and Sanitation. We may also consider submitted the final report to Limpopo Department of Economic Development, Environmental and Tourism.
21	Please note that the D2219 Jane Furse Road is a district road to which building lines apply of 15m+20m from the centre line of the road. DMR must wait for the conditions of Limpopo Roads Agency	Phuti Montjane Limpopo Roads Agency	4 December 2015	Noted. The Draft EIR which includes the outcome of the Traffic Impact Assessment will be submitted to Limpopo Roads Agency for comments and inputs. Any conditions will be included in the EMPr for

	<p>before approving the Mining Right. The conditions of the road authority should be included in the Environmental Authorisation. The mine infrastructure must honour the building line of the district road. The building line is approx. 35-40m from the centre line of the road. Further the roads agency must approve of the access road position and design from the district road.</p>			<p>the project. Such conditions/comments will be highlighted in the EIR for consideration as conditions for the Environmental Authorisation to be issued by DMR.</p> <p>Mbavhi Ngobeni from Rakhoma indicated that they are aware that the 77 trips by trucks per day for shipping ore to Roosenekal would be high. Rakhoma has discussed with Transnet the need to bring a railsiding closer to the proposed Geluk Mine. Hopefully these developments can take place by the time the mine ramps up to full production of 700 000 tons/annum.</p>
22	<p>My apologies for my late arrival. What form of sanitation would be provided at the mine?</p> <p>We would need to determine if Jane Furse does have capacity for the effluent and also note that Jane Furse WWTP is not</p>	<p>Bridget Pilusa Sekhukhune District Municipality</p>	<p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that chemical toilets would be rented from contractors such as Talisman Hire. The effluent from the chemical toilets would need to be vacuumed from the toilets by vacuum trucks and be disposed of at the closest Waste Water Treatment Plant, such as at Jane Furse.</p>

	functioning well!			
23	<p>How will the mine dispose of their domestic waste?</p> <p>Will the mine have a skip on site which they will remove on a weekly basis to the landfill site OR must the municipality collect and remove the waste to the landfill site?</p>	Bridget Pilusa Sekhukhune District Municipality	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that domestic waste could be removed to the Jane Furse Landfill site.</p> <p>It will be confirmed with the mine contractor if they would like the municipality to remove the waste or whether they would remove the waste themselves.</p>
	<p>Will the mine require an Air Emissions License (AEL)?</p> <p>Sekhukhune District Municipality does have an air quality officer, but the provincial authority LEDET is still responsible for the issue of AEL.</p>	Bridget Pilusa Sekhukhune District Municipality	4 December 2015	<p>Marissa Botha from Naledzi Group indicated that the mine does not require an AEL. There will be no processing plants on the mine. A raw ore product will be produced and shipped to the customer, Vanchem Vanadium Products Pty Ltd in Witbank.</p> <p>Ore excavated from the mine pits will be loaded and hauled by dump trucks to the Run of Mine and go through a mobile Crushing and Screening plant for size reduction. No washing of ore will take place or processing.</p>

16..... WAY FORWARD AND CLOSURE

Marissa Botha from Naledzi Group told the attendees that their comments and issues raised at the meeting will be recorded in the minutes of the KSW which will be prepared and distributed to all the invitees. The Power Point Presentation prepared for the meeting will also be appended to the minutes. If there are any comments which attendees wish to raise after the meeting it should be emailed to Naledzi Group before 10 December 2015 for incorporation into the issues and response table. The comments will be incorporated into the Issues and Response Report (IRR) and draft EIR & EMPR.

Currently the field investigations and specialist studies are being undertaken as part of the EIA study continuing into January 2016. In January 2016 Naledzi Group will start with public participation within the study area by conducting Focus Group Meetings with the local authorities of Makhuduthamaga and Greater Tubatse. A Focus Group Meeting will be scheduled with the tribal authorities and their representing chiefs after whom a public meeting with host communities will follow. Details and the outcome of the public participation process will be documented in the EIR.

During January 2016 the Draft EIR & EMPr will be prepared based out the findings of the specialist investigations and the public participation process. The environmental reports will be available for public review by February 2016 – March 2016. Please be advised that the new EIA Regulations of 2014 only allows a commenting period of 30 days. Naledzi requests that organs of state please provide comments within the regulated time frames. Within the public review period Naledzi Group would host information sessions to discuss the findings of the Draft EIR with tribal authorities, local authorities and host communities. During April 2016 the EIR and EMPr will be finalised and submitted to DMR for approval.

She thanked the attendees for their inputs during the meeting. The meeting was closed at 12:30pm.

ATTENDANCE RECORD

The attendance register is attached as Annexure A.

KEY STAKEHOLDERS WORKSHOP PRESENTATION

The KSW Meeting Presentation is attached as Annexure B.