

**ENVIRONMENTAL AUTHORISATIONS FOR  
THE PROPOSED PLATREEF UNDERGROUND  
MINE PROJECT, NEAR MOKOPANE IN THE  
LIMPOPO PROVINCE**

**COMMENTS AND RESPONSE REPORT**

**January 2014**

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**DIGBY WELLS**  
ENVIRONMENTAL

This document has been prepared by **Digby Wells Environmental**.

**Report Title: Comments and Response Report**

**Project Number: PLA 1677**

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## 1 INTRODUCTION

This Comments and Response Report (CRR) Version 1 provides a summary of the comments, questions and issues raised by stakeholders since August 2013. An Environmental Impact Assessment (EIA) process in support for the proposed development of the Platreef Underground Mine Project is being followed and this report provides a summary of stakeholder comments being recorded throughout the EIA process.

- Version 1 of the CRR is appended to the Draft Scoping Report which was made available for public review from the 21 June 2013 to 1 August 2013;
- Version 2 of the CRR included comments and issues raised by stakeholders during the public review period of the Draft Scoping Report. Version 2 was appended to the Final Scoping Report which was made available to stakeholders from the 23 August 2013 till the 10 October 2013.
- Version 3 will be appended to the Draft EIA Report and will include all comments from stakeholders on the Final Scoping Report.
- Version 4 of the CRR will be appended to the Final EIA Report. Version 4 will include comments from stakeholders on the Draft EIA Report.

Version 1 of the CRR will be updated to become Version 2, Version 3 and Version 4 of the CRR – therefore issues and comments recorded in the first document will be carried over to all the next versions of the CRR.

## 2 ISSUES AND RESPONSES

Table 1 below presents the issues and concerns raised thus far as well as the responses to the issues and concerns.

The Layers for Human Rights on behalf of MIACC made extensive comments on the Draft EIA these comments as well as the responses given are provided in Annexures A, B, C and D of this document.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<b>3 GENERAL</b>				
The IDP does not have a procurement or HR department, the Social and Labour Plan is Platreef's responsibility.	Mr Kekana	01/12/2013	Mmadikan a Sport Ground Public Meeting	This is correct the SLP has a section dealing with both HR development and procurement.
The Nduna and the Chief are in those positions because of the people. Their duty is to serve and protect the people.	Ms Elizabeth Ngobeni Tshamahansi	01/12/2013	Mmadikan a Sport Ground Public Meeting	Noted.
The relationship between Platreef and the Government is a concern because there is no government representative in these meetings. The Government should attend meetings and also consult with the communities. The Government should come and tell the people what is happening regarding the mine so that communities can be at ease.	Mr Joseph Nguepe Ga-Magongoa	20/11/2013	Mokopane Town Public Meeting	The application submitted to the DMR in June is a Mining Right Application and not a mining right. People should talk to their Ward Councillors and request that Government talk to the communities regarding the project.
The constitution and Mining Charter states that the government (DMR) must approach the people and explain the projects, the requested is that Platreef try and bring the Government (DMR) to the communities	Ms Jean Manamela	20/11/2013	Mokopane Town Public Meeting	The comment is noted.
Platreef should slow down and give the community a chance to discuss things with their lawyers and geologists about the project	Mr RS Manganyi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	Platreef has a schedule and timeline that it needs to follow as all the consultations and exploration needs to be within the time frame set by the government.
The community needs Platreef to commit to their promises and deliver on what they say they will do.	Mr RS Manganyi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	Platreef meets their commitments; they are for example in a process of improving the Ben Hlugwani school.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
The focus should be to build lasting relationships between the communities and Platreef.	Mr Victor Baloyi Machikiri Kgoro - Secretary	14/11/2013	Mokopane Traditional Council Meeting	Agreed
Will Platreef provide electricity for the community of Mzombane?	Ms Josephine Madiba Kgoro Ga- Madiba	14/11/2013	Mokopane Traditional Council Meeting	It is not Platreef's responsibility to provide electricity it is the Government's responsibility.
Should Platreef fail to fulfil the promises made in this meeting, what can the people do to ensure that Platreef is brought to book?	Ms Miriam Moumakwe Ga - Sekgoboko Council	14/11/2013	Mokopane Traditional Council Meeting	Platreef's doors are always open to listen, consider and respond to any grievances. You can lodge a formal grievance with the company. As a last resort, you can approach the relevant government departments.
Mr Thabo was not allowed to ask any questions. The community members contested that he does not belong within the affected community.	Mr Thabo Mapela	17/07/2013	Public Meeting Magongoa	Noted
Do Platreef and Digby Wells know the status of Mzombane village? I have been in leadership since 2008 and, the village is still being formalised.	Mr Machau Mzombane	7/07/2013	Public Meeting Magongoa	The process of formalisation of the village of Mzombane falls outside of the Environmental and Social Impact Assessment (ESIA) and needs to be taken up with the authorities.
Will Platreef be able to mine in an area or village where there is no electricity such as at Mzombane?	Mr Machau Mzombane	7/07/2013	Public Meeting Magongoa	The fact that Mzombane does not have electricity should not affect the mine. Electricity supply needs to be taken up with the Municipality.
It was said that there will be cooperation. Platreef is not intending to work with the communities of Mokopane. In a meeting in Sandton, we indicated that they wanted 17 villages to be included in the affected villages. Now Platreef is only	Mr Elvis Molwatse Chairperson of Mokopane	7/07/2013	Public Meeting Magongoa	The eight villages identified are the most directly affected villages as they will experience the majority of the negative impacts. This does not

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
focusing on eight villages that are affected. We within the affected villages are being played as fools. The people will not participate until the issues have been resolved.	Interested and Affected Community Committee (MIACC)			mean the other villages are excluded.
I have worked at the mines and have experience. Platreef is unfair.	Mr Kenneth Tshamahansi – member of MIACC	7/07/2013	Public Meeting Magongoa	The comment is noted. Platreef has been fair in all its dealings with the communities.
The people, who were given money, let the mine go to them not us.	Mr Molala Ga-Kgobudi	7/07/2013	Public Meeting Magongoa	It is unclear to which money is being referred. Platreef pays money to its suppliers and vendors for goods and services.
<b>4 IN FAVOUR OF THE MINE</b>				
It is appreciated that Platreef has come to the villages, the community hopes that its presence will bring opportunities for the people of Mokopane.	Ms Mokonyane Linah Victim Support Centre Mahwelereng/ Majalla Trading/CSF	20/11/2013	Mokopane Town Public Meeting	Comment noted
You always have my undivided support. You are playing a major role by willing to offer community opportunity to put food on the table whilst making a living. People like myself might benefit one way or another.	Mr Lesiba Jacob Molomo	11/11/2013	Email	Comment noted
My name is Tshepho Maja the permanent resident of Mogalakwena Moshate I personally accept the proposed mining company to be given a chance to mine.	Mr Tshepho Maja Mogalakwena Moshate	10/11/2013	Email	Comment noted



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
I am working for the mine. If the community is saying that the drilling machines must stop, must I also stop working? This would be unfair since it will have a negative impact on my family's wellbeing.	Mr Samuel Matha Gaguru	7/07/2013	Public Meeting Magongoa	The drilling machines will not stop as Platreef have permission from the Department of Mineral Resources (DMR) to continue drilling.
He pleaded with the community not to stop the mine operation.	Mr Samuel Matha Gaguru	7/07/2013	Public Meeting Magongoa	The exploration activities and other operations will only be stopped if the DMR directs Platreef to do so.
I am employed by Platreef. Have heard everyone talking. Everyone present is attacking Platreef.	Mr Isaac	7/07/2013	Public Meeting Magongoa	The meeting was stopped at this point due to a disruption in the crowd.
<b>5 PRESENTATIONS</b>				
The interpreter was struggling with some of the words and struggled to interpret during the meeting. He was talking about animals and not "Dipholoholo". Someone else from the local area should be used to translate proper	Mr E. Honiball Attorney and Community Legal representative and representing Lawyers for Human Rights	12/07/2013	Stakeholders Forum Meeting	In future Digby Wells will use different interpreters/translators for the presentations.
The translator did not do a good job; in future please provide good translations for the people.	Mr Thomas Ngove Tshamahansi / Maceke Village	7/07/2013	Public Meeting Tshamahansi	We apologise for the translation and, will provide better translation for the stakeholder meetings in the future.
The manner in which the presentation was conducted was not good since the projection screens are off. This affects old people who do not understand such proceedings.	Mr Nduma Tshamahansi	7/07/2013	Public Meeting Magongoa	We will ensure that at the next meeting the technology will be working.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Digby Wells presentation was vague and not applicable to the issues raised by the communities.	Mr Sello Kekana	7/07/2013	Public Meeting Magongoa	The Draft Scoping reports were made available to the public for review before the public meetings. Detailed information is contained in these reports.
Digby Wells cannot come to the fields and explain the presentation to people. There is no truth in this. When will Platreef give back a detailed report on all the issues raised? They call the people for food; it is just a show for the community.	Mr John Magongoa	7/07/2013	Public Meeting Magongoa	Platreef responds to issues in all the public forums as issues arise.
<b>6 PUBLIC PARTICIPATION</b>				
It was mentioned that communities were consulted for the Social and Labour Plan (SLP), can Platreef provide proof of this?	Mr Oseng Kopole Masehlaneng Development Committee	01/12/2013	Mmadikan a Sport Ground Public Meeting	The Mining Charter stipulates how the plan should be compiled. The municipality develops an Integrated Development Plan (IDP), this plan is incorporated into the Social and Labour Plan (SLP) to establish what needs to be done in the community.
Who did Platreef speak to before coming to the community?	Mr Matsemela Masehlaneng	01/12/2013	Mmadikan a Sport Ground Public Meeting	The Department of Mineral Resources (DMR) requirement is that all affected parties be consulted and that the meetings be held in neutral places, section 93 states that the meetings should be held with affected communities therefore no meetings will be held in secret or with certain individuals.
Platreef should not hold separate meetings for Tshamahansi and Mokopane because these villages belong to one chief.	Ms Elizabeth Ngobeni Tshamahansi	01/12/2013	Mmadikan a Sport Ground Public Meeting	The separate meeting was held at the request of the Tshamahansi Village leadership.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
The community will not benefit from the mining activities and these activities must be stopped before it is too late, all those who are against the mining activities should leave this meeting now and sign a petition that will be taken to court so that these activities do not commence.	Mr Frans Makhafola Masesetjane	01/12/2013	Mr Frans Makhafola Masesetjane	Comment noted, however the mine development will bring significant benefits to the communities, and prevention or delay of this development will be to detriment of the communities.  All the activities are regulated, and there is therefore no need for a petition or for court intervention.
There are private meetings being held with farmers, these meetings should be held publicly.	Mr Lesiba Lamola Kgubudi Community Forum	28/11/2013	Focus Group Meeting	It is uncertain as to which meetings are being referred to.
Does the Public Participation Process solve problems faced by communities or is it just an information session?	Mr Jacob Mashala	28/11/2013	Focus Group Meeting	The PPP is a legal requirement forming part of the licensing process. All comments and issues raised to date have been compiled into a single report, this Comments and Response Report. This report is submitted to the authorities for them to consider the inputs from the I&APs during the decision making process. The government is responsible for making a final decision in terms of the licenses and they must read the report and take the issues into consideration.
I am hereby specifically in response of Appendix O: Public Participation process documents and information, I like to register a formal argument of Appendix O-7 meeting minutes During all presentation I mentioned that I represent Sanco Mosesetjane but in you Sanco is not written, I am not an individual, I represent Sanco Mosesetjane.	Mr Sello Jonas Kekana SANCO Mosesetjane	4/12/2013	Fax	Comment noted,

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
We need all reports to be translated in Sepedi for it to be easier for communities to access the information.	Mr Sello Jonas Kekana SANCO Mosestjane	4/12/2013	Fax	The reports are presented at public meetings in Sepedi and a non-technical summary of the Draft EIA was provided in Sepedi.
The information brought to us by Digby Wells is clearly understood and is appreciated but the promises made must be honoured.	Mr Madimetja Daniel Mokgotho Ward 24 Leader	20/11/2013	Mokopane Town Public Meeting	Comment noted.
Regarding the disruption on Sunday, 17 November, we request that the meeting be arranged again to provide people the opportunity to obtain information. The community at large is not part of people who disrupted the meeting.  The Stakeholder Forum should be called together prior to the meeting to discuss the agenda for the community meeting. The leadership will then be able to get information from people who have other concerns and this will help in preventing any disruptions at the community meetings.	Mr Lekau Kekana Kugbudi Community Forum (KCF)  Mokopane Interested and Affected Community Development Forum (MIACDF)	20/11/2013	Mokopane Town Public Meeting	The meeting will be reconvened on 1 December 2013.
The meeting is losing focus, the meeting is about the findings of the EIA.	Mr Ulysis Phaladi Youth Parliament	20/11/2013	Mokopane Town Public Meeting	Noted.
During the presentation Steve referred to “we”. Who are we?	Mr Honiball E.G Honiball Attorneys Representing Ka-Kgubudi,	20/11/2013	Mokopane Town Public Meeting	The “we” refers to Platreef or Digby Wells as appropriate.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	LHR and in his personal capacity			
Consultation and two way communication with the community must be a priority. The Chamber has experienced a situation where a presentation was given and no opportunity for questions afforded. We feel that this type of activity creates frustration, and transparency is lacking. We request this highest standard of community involvement on behalf of both the immediately affected villages, and the townspeople.	Mokopane Business Chamber	19/11/2013	Email and Letter	A range of meetings have been held with the Public as part of the ESIA process as well as Platreef's own stakeholder engagement. Time is always provided for questions and answers. The stakeholder engagement process is also not completed with the ESIA but will be ongoing throughout the life of the mine. Platreef's doors are always open to engage with stakeholders in their host communities.
In view of the sensitive socio-economic nature of the proposed mining site, the Mokopane Chamber insists that the participation process be inclusive in approach, transparent and very well publicized. The dates and venues chosen for public interaction must be such that community participation is easily possible.	Mokopane Business Chamber	19/11/2013	Email and Letter	Comment noted as above.
The community is pleased with the way Digby Wells conducts meetings, but information should also reach those who cannot get to the public places where documents are kept.	Mr Victor Baloyi Machikiri CPA	15/11/2013	Stakeholders Forum Meeting	Thank you, comment noted.
Presenters take their time to present yet limit the question and answer session to one hour, communities must voice out their concerns without time constraints	Mr Joshua Mojela Mosesetjane Ga-Sekgoboko Development	15/11/2013	Stakeholders Forum Meeting	Comment noted, people are also afforded the opportunity to provide written comment and sufficient time was allowed for questions not only one hour.
The money spent to host meetings in expensive venues should be spent on bringing this information to our respective places not a hotel.	Mr Joshua Mojela Mosesetjane	15/11/2013	Stakeholders Forum Meeting	Comment noted. The information is also at the public libraries and at the other venues provided.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Ga-Sekgoboko Development			
Several meetings were requested with Platreef management but Platreef has been avoiding a meeting.	Chief Kekana Mokopane Traditional Council	14/11/2013	Mokopane Traditional Council Meeting	Platreef has met several times with Chief Kekana on various matters, including but not limited to BBBEE and procurement.
Platreef is operating as though we are still in the apartheid regime (eg. holding separate meetings for the Tshamahansi community and Magongoa community with the purpose of causing division amongst black people). Platreef should not decide for communities, communities should decide how they want consultation to take place.	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional Council Meeting	Separate meetings were held with Tshamahansi at the request of the Tshamahansi leadership. It is not Platreef's intention to divide the communities.
Why is there a separate meeting for Tshamahansi when all 17 Villages fall under one Tribal Authority?	Mr Jacob Kekana Kgobudi Kgoro	14/11/2013	Mokopane Traditional Council Meeting	Separate meetings were held with Tshamahansi at the request of the Tshamahansi leadership.
Platreef and Digby Wells should consult before taking decisions, nothing for us without us	Mr M.M Lekalakala Masodi	14/11/2013	Mokopane Traditional Council Meeting	This is the reason for all the consultation meetings which have taken place and which will happen in the future.
There should be one meeting for all affected villages because these separate meetings will cause hostility among communities.	Ms Linah Mokonyane Maroteng Headman	14/11/2013	Mokopane Traditional Council Meeting	Separate meetings were held with Tshamahansi at the request of the Tshamahansi leadership.
Please inform the affected communities when mining starts as you have been informing us of all actions throughout the process.	Ms Linah Mokonyane Maroteng Headman	14/11/2013	Mokopane Traditional Council	There will still be a number of meetings held before mining could start and people will be kept informed.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Meeting	
<p>We note that the deadline for commenting on the EIA/EMP is 25 November 2013. We are of the view that the timeframes the we have been afforded to make representations on the above reports are insufficient, more so the time frame for commenting on the EIA/EM. We are however willing and prepared to furnish our comment/ representation to both the EIA and the EIA/EMP on 14 December 2013.</p> <p>Accordingly, kindly extend the timeframe for commenting on the EIA/EMP to 14 December 2013 for the following reasons –</p> <p>1. You are obliged, in terms of applicable legislation, to afford our clients a reasonable opportunity to make representation on the EMP and other administrative processes taken under the Mineral and Petroleum Resources Development Act of 2002. The current deadline of 25 November 2013 to make our representation to the EIA/EMP is manifestly insufficient and unreasonable. It violates our clients’ rights to an administrative process that is reasonable and that is lawful and procedurally fair.</p> <p>2. The EIA/ EMP comprises the listed activities under the National Environmental Management Waste Act of 2009 and Environmental Impact assessment Amendment Regulations, 2010 are applicable to the EIA/ EMP. You are therefore required to ensure that our clients’ participation in the public participation process is facilitated in such a manner that our clients and all potential interested and affected parties are provided with a reasonable opportunity to comment on the EIA/EMP.</p>	<p>Mr Osmond Mngomezulu Lawyers for Human Rights</p>	<p>7/11/2013</p>	<p>Email and Letter</p>	<p>The commenting period was extended to 14 December 2013 as requested.</p>

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Having regard to the above, we await your urgent confirmation that the deadline for commenting on the EMP has been extend to the 14 December 2013.				
Government officials should be present in these meetings and represent the various Departments. The process must be transparent and involve everyone.	Mr Aubrey Langa Masehlaneng	11/08/2013	Mining Right Application Public Meeting	The comment is noted. Government is invited to these meetings however, it is up to them whether they decide to attend. The Department of Rural Development and Land Reform (DRDLR) do attend these meetings and have sent a letter to the DMR indicating that they are happy with the way in which the meetings were conducted.
A two hour meeting is not enough to capture all the issues that should be dealt with for a 30 year project.	Mr Oupa Kale Masehlaneng	11/08/2013	Mining Right Application Public Meeting	People are able to send additional comments to Digby Wells should they still wish to make additional comments after the meeting. The project team was also available after the meeting to take comments.
We are only being given two hours to address something that will have lifelong consequences. Do not put a timeframe to the meeting. Was the invitation extended to Magongoa and where are the traditional leaders?	Mr Ledwaba Mzombani 7 Miles	11/08/2013	Mining Right Application Public Meeting	The meeting was advertised to start at 9 -11am but because we started at 10am, the time is now extended to 1pm. The first meeting was held in Magongoa and we are providing other communities the opportunity to attend/host the meetings. The leaders are always invited to the community meetings but the decision to attend lies entirely with them.
Platreef indicates that they met up with the leaders. Who are those leaders and where are they? There is no presence of the Chief in any of the meetings but Digby Wells is still continuing with these meetings as part of the MRA. Platreef must face the	Mr Robert Mogafe	12/07/2013	Stakeholders Forum Meeting	Platreef and Digby Wells met with the traditional leaders of all the affected villages. The request for information is dealt with in the section of the issues table dealing with the lawyers' letters.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
challenges in the community before these community meetings can carry on. We even have lawyers, but they are not provided with the required information.				
Even at the Sunday meetings, short message services (SMS) were sent to people who are not even affected by the development but came for employment opportunities.	Mr Robert Mogafe	12/07/2013	Stakeholders Forum Meeting	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate. The SMSs were sent to notify/invite as many people as possible.
It was said that people must be engaged even to the extent of one-on-one consultations. The way Platreef is handling the community is very frustrating for the communities. Do not promise people good things.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	The consultation process for the ESIA is on-going and where required will include one on one consultation.
There will be no more meetings and the community will not participate until the information is made available.	Mr Isaac Nyoni Sabaha April Corporation	12/07/2013	Stakeholders Forum Meeting	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate. The EISA information has been made available for public review from 21 June 2013 till 1 August 2013.
The initial consultations were done at the households and not separately at Magongoa and Tshamahansi. Digby Wells and Platreef are disrespectful towards the community.	Mr Isaac Nyoni Sabaha April Corporation	12/07/2013	Stakeholders Forum Meeting	When Platreef came to Mokopane, they consulted with the traditional leadership structures. At that time there were mining committees which were used as a way for communication with the people. Then there was a concern that these committees were not representative and were not communicating with the broader community. The committees were then disbanded. The committee we are meeting with today has replaced the mining committees

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
How can Digby Wells enter the communities without following protocol, how did they consult with the communities and when. Where are the minutes of those meetings?	Ms Mama Kgao	12/07/2013	Stakeholders Forum Meeting	Digby Wells have always followed protocol by first meeting with the Traditional leadership before holding meetings with the community. The meetings minutes held with communities are included in the Comments and Response Reports associated with the applications which have been made.
The initial consultations were done together and not separately at Magongoa and Tshamahansi as what was done during last week's meetings	Ms Mama Kgao	12/07/2013	Stakeholders Forum Meeting	A separate meeting was held with Tshamahansi on the request of the leadership of Tshamahansi.
Point of order – what is the relevancy of this meeting or issues of participation when people have problems and grievances? The people have raised concerns about the legal team and wanting information. But now we are participating, taking roll calls etc.	Mr Peter	12/07/2013	Stakeholders Forum Meeting	Please see the responses provided to the legal letters.
Platreef is creating divisions by taking Tshamahansi and making it an island from the Chief.	Mr Lekau Kekana Kugbudi Community Forum (KCF) Mokopane Interested and Affected Community Development Forum (MIACDF)	12/07/2013	Stakeholders Forum Meeting	A separate meeting was held with Tshamahansi on the request of the leadership of Tshamahansi.
We want to see that the Mineral and Petroleum Resources Development Act (MPRDA), National Environmental Management Act (NEMA) Public Participation processes	Mr Lekau Kekana KCF & MIACDF	12/07/2012	Stakeholders Forum Meeting	Digby Wells is following the Public Participation Processes as required by the legislation.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
conducted properly.				
The SMSs going to everyone must stop and the database used must be deleted. Categories must be made in the database of who belongs to which villages.	Mr Lekau Kekana KCF & MIACDF	12/07/2012	Stakeholders Forum Meeting	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate. The SMSs were sent to invite as many people as possible.
May you please consider using radio for advertising the meeting in the future as the elderly people cannot read newspapers but do listen to the radio.	Mr Thomas Ngove Tshamahansi / Maceke Village	7/07/2013	Public Meeting Tshamahansi	Digby Wells will consider using radio advertisements in the future for advertising the meetings
Can there be a facility made available in Tshamahansi where all documents relating to the project can be obtained from.	Mr M.J Maluleke Tshamahansi / Maceke Village	7/07/2013	Public Meeting Tshamahansi	Platreef is in a process of building a community liaison centre in Tshamahansi and will use this centre for distributing information.  Platreef has appointed Community Relations Assistants (CRA) for the Tshamahansi community. Documents can now be obtained from these appointed CRA's.
Can Digby Wells bring printouts of the presentation to the stakeholder meetings?	Mr Percy Mtileni Tshamahansi	7/07/2013	Public Meeting Tshamahansi	Digby Wells did not know how the turnout would be at the meetings and therefore no printouts were made. The presentation will be available from the headmen for those who are interested in reading it. This has been addressed at the EIA feedback meetings.
With regards to meeting invitations, some people received SMS and others did not, May you please clarify why not everyone got an SMS invite?	Mr Johannes Maluleke Tshamahansi /	7/07/2013	Public Meeting Tshamahansi	The SMS were sent to all the people on the Interested and Affected Party (I&AP) database.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Maceke Village		nsi	
Platreef is disrespecting the communities. When were the consultations with tribal leaders held as indicated by Digby Wells? Digby Wells must be fair in their process and speak to the Chief and Indunas prior to any consultations being conducted and invite them to attend the meetings.	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	The Indunas were met at meetings held on the 20 June 2013 where they were informed of the public meeting and were invited to attend. The Chief, Indunas and the DMR did not attend.
How can there be a meeting without the presence of official leaders? It was indicated by the people that the mine must come directly to the village communities and not in a tent in this area like today. When there is a meeting, we want our Chief and Indunas present so that they can also engage with the people on these issues.	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	Response as above.
Kabelo from Digby Wells was replaced by a white woman so that she could relay a different version of events to the community.	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	The comment is unfounded Kabelo left Digby Wells to join another company. Barbara and all the employees of Digby Wells are professionals and the reputation of the company is dependent on the employees running independent and transparent processes.
Digby Wells must stop sending short message services (SMSs) and involving other people who are not affected by the project.	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate. The SMSs were sent to invite as many people as possible.
Why did two consultations taking place, and who is in charge of the meeting taking place in Tshamahansi?	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	A separate meeting was held with Tshamahansi on the request of the leadership of Tshamahansi.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Platreef has caused a division amongst the communities and the Chief and therefore Platreef should re-unite them.	Mr Donas Makhubela Tshamahansi	7/07/2013	Public Meeting Magongoa	Platreef engages with all stakeholders equally and has received written permission to conduct all its public participation meetings.
Platreef treats people like “donkeys” – they are telling people what to do. They do not listen; they do things their own way.	Mr Emile Honiball Community Legal Representative	7/07/2013	Public Meeting Magongoa	Platreef has created platforms for public participation including the public meeting and the stakeholder engagement forum and Platreef listens to and responds to issues as they arise.
During a meeting at the Oasis Lodge, the President of Platreef did not provide them with the opportunity to speak as part of the engagement process	Mr Emile Honiball Community Legal Representative	7/07/2013	Public Meeting Magongoa	The allegation is unfounded.
Are the Directors of Platreef responsible for their actions as they claim? The community was not notified adequately regarding consultation meetings.	Mr Emile Honiball Community Legal Representative	7/07/2013	Public Meeting Magongoa	The communities were notified of the meetings by using site notices, SMS, advertisements in newspapers and loud hailing.
People must be consulted first, prior to any meetings. This has not been done.	Mr Emile Honiball Community Legal Representative	7/07/2013	Public Meeting Magongoa	The traditional leadership of the community was consulted on the 20 June 2013 prior to the public meetings.
In terms of consultation with the tribal authorities, it must be noted that there are certain issues not acknowledged by the masses. Digby Wells must speak with Platreef regarding this	Mr Emile Honiball	7/07/2013	Public Meeting	Digby Wells is in consultation with Platreef. The issue is noted. Digby Wells is running an independent process. The broader leadership of

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
issue and not just follow through on what Platreef wants them to do.	Community Legal Representative		Magongoa	the affected communities was engaged at a Stakeholders Forum Meeting held at the Oasis Hotel on the 12 July 2013. The issues raised at this meeting are included in this Comments and Response Report (CRR).
Digby Wells must distribute information in advance prior to public meetings. The majority of community members only heard half of the information presented as they do not understand due to lack of information.	Mr Nduma	7/07/2013	Public Meeting Magongoa	Digby Wells did not know how the turnout would be at the meetings and therefore no printouts were made. The presentation will be available from the headmen for those who are interested in reading it. This has been addressed in the EIA feedback meetings by making the presentation available.
He appreciates the gathering but is not happy as to how people were informed about the meeting. Only affected parties must be invited to the meeting and not interested parties who just ate food and left the meeting, leaving the affected communities with no food.	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate.
There is a special consultation meeting being held at Tshamahansi. They are not living in separately but are part of the same community. There are challenges and divisions within the communities. The Tshamahansi people are saying they do not have a Chief and don't respect the Kekana Chief. The mine must not promote this division. They must stay away and call one meeting so that the DMR can be aware of these issues	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	A separate meeting was held with Tshamahansi on the request of the leadership of Tshamahansi.
Platreef should not support community uprisings and divisions.	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	Platreef does not support divisions, uprisings and factions in the communities, including political and leadership factions. Platreef does not become involved therein.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
In terms of Public Participation Process, the meetings must not go through the Kgoros, even if they have space in the Kgoros. These meetings must rather be conducted in public. Even if people do not come to meetings, they can address the matter with the DMR.	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate. The Kgoros are one of the many channels through which the meetings need to be arranged.
Reports indicate that all public participation meetings went well, but the meetings did not go well.	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	The allegation needs to be substantiated.
When the communities request the DMR to come to meetings, they do not come but when they are called by the mine, then they are present.	Mr Lekau Kekana KCF & MIACDF	7/07/2013	Public Meeting Magongoa	The DMR is invited to all the meetings it is up to the Department to decide whether they will attend or not.
Platreef involved people from Hammanskraal and Seleka for the purposes of receiving votes.	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	7/07/2013	Public Meeting Magongoa	As required by legislation (The Constitution, MPRDA, NEMA) the meetings need to be public meetings and everyone should be free to participate.
Today, there are separate meetings. Why? They are promoting division within communities.	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community	7/07/2013	Public Meeting Magongoa	A separate meeting was held with Tshamahansi on the request of the leadership of Tshamahansi.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Committee (MIACC)			
The consultations have not begun at all. It is required that consultation be done at the fields and agreement be reached.	Mr Elvis Molwatshe Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	7/07/2013	Public Meeting Magongoa	The consultations for the Mining Right Application and the other applications have started.
Digby Wells was informed previously that all communities must be engaged. But this is not happening as separate meetings are being held.	Mr Elvis Molwatshe Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	7/07/2013	Public Meeting Magongoa	In an effort to engage all the communities a meeting was held with Tshamahansi.
Digby Wells consulted with certain individuals in Mzombane and not the whole community.	Mr Elvis Molwatshe Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	7/07/2013	Public Meeting Magongoa	The allegation needs to be substantiated, it is uncertain to which individuals are being referred.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
All the issues must be recorded and noted accordingly. Platreef must do things right.	Mr Kenneth Tshamahansi – member of MIACC	7/07/2013	Public Meeting Magongoa	All issues raised at the meetings are recorded in this CRR.
This is the second meeting. People travel and spend money but they are not being told the truth.	Mr John Magongoa	7/07/2013	Public Meeting Magongoa	There will be a number of meetings as part of the public participation process. People are encouraged to attend these meetings in order to stay up to date with the process. Digby Wells and Platreef are presenting the truth to the communities.
We do not know any of the people at the table. They are not from the community.	Mr John Magongoa	7/07/2013	Public Meeting Magongoa	The people at the table were representing Platreef, Digby Wells and Barnstone.
Whilst we think that we understand the reason for your holding the public participation meetings on a Sunday at the chosen venue, we would like to request that you hold an additional public participation meeting.	Gerrit van der Veen President Mokopane Chamber of Business	07/08/2013	Email and Letter	During the EIA feedback a meeting was held in Mokopane Town.
It is not commonplace for businesspeople or other townspeople, who are also interested and affected parties to attend such events on a Sunday. It is also difficult for people from this broader community to attend such a function in the chosen venue out of town.	Gerrit van der Veen President Mokopane Chamber of Business	07/08/2013	Email and Letter	During the EIA feedback a meeting was held in Mokopane Town.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
We request that you hold an additional meeting of this nature to accommodate this portion of the community, at a venue in town, and on a work day during the week. We also request that this is widely publicized in advance through your database of interested and affected parties, and also in the local media. We appreciate your cooperation in this regard.	Gerrit van der Veen President Mokopane Chamber of Business	07/08/2013	Email and Letter	During the EIA feedback a meeting was held in Mokopane Town.
Please could a more suitable venue and day be arranged so as to meet with the affected land owners?	Jill Emmerich E5 Farming	07/08/2013	Email	During the EIA feedback a meeting was held in Mokopane Town
We have attended 2 meetings at Oasis. We were unable to address issues affecting us due to the needs of the Tshamahansi community being discussed. I'm afraid your proposed meeting on Sunday will be even less productive for us!	Jill Emmerich E5 Farming	07/08/2013	Email	During the EIA feedback a meeting was held in Mokopane Town
NB: In the future Digby Wells environmental is requested to observe protocol within our communities, don't involve community first and later engage leadership such conduct should stop on the immediate effect. We are looking forward for good working relationship and that later will bring proper sustainable development Within our communities.	Mr Lekau Kekana KCF & MIACDF	12/07/2013	Email	The traditional leadership of the communities were engaged prior to the public meetings being held.
Sir would like to inquire about me not being invited to the public meetings. I found it so far if not mistaken 2 groups are invited. My Name is Phillemon Makwena Ramoroka ID 841214 5753 085. Not sure if I will still be called. Will be ma pleasure if u can assist me on that. tanx Makwena	Phillemon Makwena Ramoroka	08/07/2013	Email	Everyone is welcome to attend any of the public meetings.
<b>7 REQUEST TO REGISTER AS AN I&amp;AP</b>				
Request to be registered as an I&AP.	Wena Goelst	16/09/2013	Email	Registered as requested.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Request to be registered as an I&AP.	Mr Percy Motileng	09/09/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr WG Young Farm – Conterberg	04/09/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr Jan Young Farm - Hendriksrust	04/09/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr Motjoko Johannes Langa Mogalakwena Faith and Hope Foundation	02/09/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr Janlo Möller Farm: Bokpoort KR 328 Individual: Process Engineer	02/09/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mrs Renita Prinsloo Potgietersrus Distrikkslandbou Unie	30/08/2013	Email and registration form	Registered as requested.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Request to be registered as an I&AP.	Mr Les Coetzee	30/08/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr Rankeka Maema Stand no. 629 Mzombane	28/08/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Mr Rankeka Maema Stand no. 629 Mzombane	27/08/2013	Email and registration form	Registered as requested.
Request to be registered as an I&AP.	Ms Pabalelo Khutso Madisha	26/08/2013	Email and registration form	Registered as requested
Wish to be registered as an interested and affected party (I&AP).	Mr Bosiname Willem Shirindi	07/08/2013	Email	Registered as requested.
Request to be registered as an I&AP.	Mr Tshikonelo Department of Roads and Transport Limpopo	07/08/2013	Email and registration form	Registered as requested
Request to be registered as an I&AP.	Mr & Mrs Sandow & Jill Emmerich E5 Farming	07/08/2013	Email and registration form	Registered as requested
Registreer my asseblief as belanghebbende party en hou my op	SHAUN Mcgrath	28/06/2013	Email	Registered as requested

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<p>hoogte.</p> <p><i>Register me as an I&amp;AP and keep me up to date with the project.</i></p>	<p>(BLC LL.B) (Pret) ATTORNEY, Notary, Conveyance and Administrator Of Estates</p>			
<b>8 COMMENTS ON THE DRAFT SCOPING DOCUMENT</b>				
<b>GENERAL COMMENTS</b>				
<p>Lack of empowerment of the eight directly affected communities, against the general knowledge that the communities are historically marginalised and would therefore not participate meaningfully in the environmental impact assessment and management strategy processes without being empowered to do so.</p>	Aubrey Langa	19/07/2013	Email and Letter	<p>The argument is well founded and empowerment strategies need to be explored.</p> <p>Communities have been provided with various opportunities to comment on the proposed project and participate meaningfully in the process. Alternative means to provide opportunities which goes beyond the current efforts employed will be investigated.</p>
<p>Indeed, the communities have confessed to Platreef concerning their weak and poor position to engage effectively in knowledge-based aspects of the mineral exploitation activity, and have requested Platreef to provide funding required to access professional assistance which is identified and chosen by the communities and over which Platreef has no say.</p>	Aubrey Langa	19/07/2013	Email and Letter	<p>There is no requirement for financial assistance for access to professional services for public participation processes however; Platreef has offered to pay for professional assistance in relation to the BBBEE consultations.</p>
<p>Attention is drawn to the fact that NEMA requires that all I&amp;APs be given the skills to effectively participate in environmental decisions. Further, the MPRDA's attached Revised Mining Charter stipulates at Item 2.6: Community Development, that</p>	Aubrey Langa	19/07/2013	Email and Letter	<p>Platreef has been in constant consultation with the traditional communities. Platreef has also engaged with various other stakeholders through the established Stakeholders Forum.</p>

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<p>mining companies must invest in ethnographic consultative and collaborative engagement with traditional communities. Presently the DMR (and MPRDA) is the regulatory authority regarding environmental authorisation in mining.</p>				
<p>The call for professional assistance is also underpinned by the persisting lack of trust the communities has for Platreef and associated consultant, despite the assurance that the environmental consultant is required by law to be independent of the mining company. The communities do not believe that the Platreef and Digby Wells would voluntary and readily empower the communities. To date the pair failed to advise the communities to seek their own independent environmental consultant which Platreef would pay for but would not have a say over.</p>	Aubrey Langa	19/07/2013	Email and Letter	Digby Wells is independent of Platreef and is bound by regulations to remain as such. It is not common practice for the client to pay for an independent environmental consultant to represent the I&APs.
<p>Flowing from the above, I would therefore not comment on the hydrology, geology and air pollution negative impacts because these aspects are knowledge-based and specialist in nature.</p>	Aubrey Langa	19/07/2013	Email and Letter	Comment noted.
<p>Accusations and allegations of complicity with Platreef and hence lack of independence on the part of Digby Wells were made during the public participation session. The accusation and allegation that Digby has secretly cornered old-aged villagers and threatened to take away their pension fund if they do not sign certain documents, was not openly denied nor refuted by both Platreef and Digby Wells representatives. The jury is still out there therefore that Digby Wells is not as independent as it is supposed to be.</p>	Aubrey Langa	19/07/2013	Email and Letter	Digby Wells is obligated by legislation to remain independent as an Environmental Assessment Practitioner as remain as such. Digby Wells has never threatened anyone of taking away their pension monies.
<p><b>SPECIFIC COMMENTS</b></p>				

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<p>During questions and answers time no environmentally-inclined NGO or CBO representative emerged, which made me wonder if both locally and internationally operating NGO's were specifically identified and notified of the public participation? Given the vulnerable and marginalized status of the directly affected communities, it is apposite of Digby Wells to ensure attendance of the NGO's as the key stakeholder that would assist the communities to participate meaningfully and effectively. At the next meeting I would like to be shown notification letters to the NGOs.</p>	Aubrey Langa	19/07/2013	Email and Letter	The comment is noted, Digby Wells will include NGOs in the next round of engagements.
<p>I am of the view that more than half the community members who attended left during break-time because of frustrations experience owing to lack of awareness and knowledge regarding environmental management process. Because of this lack of awareness and knowledge, the community members were only interested in hearing about job offers by the mine, and to learn how they would survive now that Platreef has deprived them of the use of their ploughing fields for subsistence farming. Rumours has it that the communities were told that the purpose of the gathering was mainly to be informed about employment and business opportunities and hence the good attendance.</p>	Aubrey Langa	19/07/2013	Email and Letter	A social impact assessment forms part of the EIA phase. Digby Wells cannot respond to rumours, but the notifications which were sent out were clear that the purpose of the meeting was to present the content of the scoping reports.
<p>From the above, the indication is that Digby has either not conducted a preliminary, basic impact assessment to understand the needs of the community before the EIA process begins or has done so but used the findings to prejudice the communities. Is the poor design of the public participation process not reflective of this?</p>	Aubrey Langa	19/07/2013	Email and Letter	The purpose of the scoping phase of the ESIA is to present the basic scope of work for the proposed project and associated regulatory processes. It will also inform the various specialist studies to be undertaken. Communities will be involved throughout the ESIA process to ensure that community needs are identified and addressed where possible.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Social impact should be accentuated from a sustainable development perspective, which I am of the view was not done a service during the public participation. Seeing that the mine operation will be mechanized, local community members should be prepared with requisite skills to take up this direct job opportunity.	Aubrey Langa	19/07/2013	Email and Letter	The Social Impact Assessment which forms part of the EIA phase takes into consideration the various avenues of possible development, which is underpinned by sustainability principles.
It is suggested that Platreef and Digby Wells present to the communities a very comprehensive and detailed skills development strategy and plan. Included should also be skills to participate in environmental management processes as well as trained in the monitoring of compliance with the rules and processes.	Aubrey Langa	19/07/2013	Email and Letter	Monitoring of compliance with rules and processes is the responsibility of the DMR and as such, should be investigated as a possible opportunity with the department.
Seeing that the mine operation has a limited capacity to absorb more than 2 000 direct jobs, and that mine economic activity is limited, it is urged that community-based secondary industries be investigated, particularly beneficiation of platinum in terms of the beneficiation strategy.	Aubrey Langa	19/07/2013	Email and Letter	Beneficiation is considered as part of the SLP and is required by the mining charter.
I would appreciate if response to the above comments is also directly addressed to me.	Aubrey Langa	19/07/2013	Email and Letter	Although the CRR will be included as part of the scoping report, responses provided to the various comments raised by yourself will be provided to you also.
<b>9 INFORMATION</b>				
Please provide us with the Maps that were used in this discussion so that the information can be shared with the rest of the community.	Mr KJ	28/11/2013	Tshmahansi Leadership Meeting	The latest plot and block plans will be given to the Tshamahansi Leadership. .
Where can the non-commercial information be accessed i.e.	Ms Hilary Knight	20/11/2013	Mokopane	The information has been provided to the lawyers



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
SLP?	Mokopane Chamber of Business		Town Public Meeting	for human Rights (LHR). This information is also available upon written request.
Lawyers for Human Rights (LHR) have been requesting information from Platreef to no avail. Now Platreef says they will provide information but even that information is selective, Why was the information not given to the attorneys voluntarily in the first place?	Mr Honiball E.G Honiball Attorneys Representing Ga-Kgubudi, LHR and in his personal capacity	20/11/2013	Mokopane Town Public Meeting	The non – commercial information has been provided to the LHR.
The Mokopane Chamber of Business would like to request the Baseline Reports, at the last Platreef public meeting, it was said that it was available.	Mokopane Business Chamber	04/12/2013	Email and letter	The updated groundwater report for the proposed Platreef project is in the process of being finalised and will form part of the final EIA/EMP reports. It is expected that the public review period for final EIA/EMP reports will commence around 16 January 2014, and we hereby undertake to furnish you with the final report on said date. Please let us know should you require copies of the draft water reports which were appended to the draft EIA/EMP which is currently available for public review.
Has Platreef compiled and submitted a Social Labour Plan for the Mining Rights Application, and has the community been given an opportunity to participate and share its views?	Mr France Makgafela Maseshlaneng	11/08/2013	Mining Right Application Public Meeting	Yes Platreef has submitted a SLP. The SLP is developed when applying for a Mining Right. This is a document between Platreef and the DMR which is only implemented if the Mining Right has been approved. The SLP has been presented to the communities at the Stakeholder

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				Engagement Forum.
<p>The Lawyers for Human Rights (LHR) have been requesting information related to the BBBEE structure, Minutes of Public Meetings held, Minutes held as part of Section 93 directive by the Department of Mineral Resources (DMR); and a request has been made for the Social and Labour Plan. To date, none of the information has been forthcoming.</p> <p>The lawyers have requested the information directly from the Platreef legal team without any success. Why should the public participate in these meetings without being provided with the necessary information?</p> <p>We have received the response from Platreef that they will not publicly give out the information. Why then participate in these meetings if information is not provided? Public participation is an open process and all information must be provided to the public.</p> <p>In the social study, it is indicated that an SLP is available; this information must be made public.</p>	Mr E. Honiball Attorney and Community Legal representative and representing Lawyers for Human Rights	12/07/2013	Stakeholders Forum Meeting	The request made by the Lawyers for Human Rights (LHR) was directed to the Platreef legal department. Platreef Mokopane office will confirm with the legal department in Sandton as to the status of the response. Please see the legal letter section for the response to the LHR letter.
I understand from the legal point of view that information must be presented to the lawyers prior to distribution. However, what about the communities? We have been requesting information but no feedback has been received. Must we also wait for the legal department and yet continue to participate in meetings without the information we have requested?	Mr Lekau Kekana Kugbudi Community Forum (KCF) Mokopane Interested and Affected Community Development Forum (MIACDF)	12/07/2013	Stakeholders Forum Meeting	The issue regarding the request for information has been noted and will be addressed with Platreef's legal department. All information which relates to the ESIA is available in the public domain and will continue to be made available to communities.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
If Platreef is not providing information that has been requested, they are making things more challenging for us.	Mr Isaac Nyoni Sabaha April Corporation	12/07/2013	Stakeholders Forum Meeting	The information pertaining to the scoping process for the environmental authorisations has been placed in the public domain. Both at the public libraries and on the Digby Wells website.
Placing a motion – are we continuing or stopping with this meeting? Digby Wells, we made a request for available information which has not been provided. Now you expect us to participate in this meeting. It was indicated that people must ask questions about the environment, but the people do not ask pertinent questions because they do not have any information. You have all the documents pertaining to the Prospecting Right Application (PRA) and the Bulk Sample and there were amendments to the SLP and EMP. Where are those documents? The people here are representatives from the organisations so they do not even have the information. Yesterday we said that we wanted the President of the Platreef and until such time, Digby Wells must not come and conduct meetings. We view the process as unfair and that Platreef and Digby Wells operate in the same way. The point that we are making is that we all want development but the correct processes should be followed. We are not ready to be engaged. The presentation is smart and very convincing but we do not have any information. When Digby Wells came here they used the Kgoros but they are not even here at this meeting.	Mr Lekau Kekana KCF & MIACDF	12/07/2013	Stakeholders Forum Meeting	The information pertaining to the scoping process for the environmental authorisations has been placed in the public domain. Both at the public libraries and on the Digby Wells website. The Bulk Sample application documentation was also placed on the Digby Wells website for public review. Digby Wells was not involved in the prospecting right application and does not have access to these documents. The prospecting right information will need to be requested from Platreef. Please see the Legal Letters section with regards to access to other information.
I have seen a few leaders present today but they are not fully participating.	Mr Lekau Kekana KCF & MIACDF	12/07/2013	Stakeholders Forum Meeting	All the leaders were invited to attend the meeting.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
We want this meeting to end. When we come to these meetings, we paid R300.00 for transport yesterday and today. We need to pay ourselves but the traditional council is paid for by Platreef.	Mr Lekau Kekana KCF & MIACDF	12/07/2013	Stakeholders Forum Meeting	The meeting was adjourned at the request of the participants. Attendance at the meetings is not paid for.  Free transport has been provided to communities.
Can Platreef consider doing career exhibitions in the local schools?	Mr Nyoni Tshamahansi	07/07/2013	Public Meeting Tshamahansi	A program has been proposed to schools to hold exhibitions on mining.
This is not the first meeting that has been held for this project. Platreef walked out of one of the previous meetings without providing responses to communities. When will Platreef provide responses to the issues raised by communities?	Mr Nduma	07/07/2013	Public Meeting Magongoa	Approximately 60 consultation meetings have been held to date. The last meeting was not conducted appropriately. There were people who disrupted the meeting and the mine employees had to withdraw from the meeting due to security concerns.  Platreef is appreciative of the fact that today's meeting is more organised as everyone is participating and listening to the discussions. This meeting forms part of an independent process facilitated by Digby Wells. The mine cannot be directly involved in environmental licensing processes as it needs to be an independent process.
Were stakeholders informed of the information presented or were only a selected group informed of the information. Did Digby Wells take the initiative to consult with specialists who act on behalf of the community? The presentation was too technical. It is proposed that Digby Wells consult with respective	Mr Aubrey Langa Masehlaneng	07/07/2013	Public Meeting Magongoa	During the previous consultation meetings held, it was indicated that a separate meeting will be held at Tshamahansi. Letters were sent to the Chiefs and the Induna's prior to the meetings. A Tribal Authority meeting was held last week to

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
community representatives who can then explain the technical information to the public to avoid the public from being confused and not being able to answer questions.				inform the leaders of the communities about the project as well as to provide the necessary documentation for distribution to the communities. A Stakeholder Forum Meeting will also be held on 07 July 2013 to inform and engage with the community leadership about this project.
The community requested all of the above issues be addressed and has sent letters to the mine but nothing has been done.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	The requests for information are being handled by the Platreef legal team. Information is given at all the public meetings which are held.
The mine does not listen and is not complying with the community's requests.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Platreef cannot comply with all the communities' requests as far as possible all reasonable requests are met.
The people have asked for a legal opinion. The Lawyers for Human Rights have asked Platreef for information, which has not been provided yet.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	The information has been provided to the LHR.
The lawyers have requested proof of the DMR directive letter from Platreef. This has not been provided. Platreef wants cooperation with the communities but they do not want to give communities the required proof and documentation. This is very confusing.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	The information has been provided to the LHR.
He has sent emails requesting information in order to discuss with the public but to date, this information has not been provided to the community. Thus there is minimal participation from the community. It is for this reason that the community are asking questions that are not related to the presentation as they do not understand the presentation due to lack of information.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	The Draft Scoping reports were made available to the public for review before the public meetings. Detailed information is contained in these reports. The requests for information are being handled by the Platreef legal team. Information is given at all the public meetings

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				which are held
There was a request for the EMP which was approved for the prospecting right application. To date, that information has not been forthcoming. The public needs this information in order to engage fully. This process is undermining rights of the public.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	A copy of the EIA and scoping report was provided to Mr Kekana.
We are requesting the following document from your office in order for our communities leadership to meaningful participate in all your environmental meeting to avoid more delays in the near future We have raised a motion related to the above matter on today meeting following our several request of public information especially on the environmental studies already conducted. EMP, social labour plan and EIA and other result of studies already conducted e.g. water monitoring report.	Mr Lekau Kekana KCF & MIACDF	12/07/2013	Email	The Draft Scoping Report was supplied to Mr Kekana. The information has been provided to the LHR. The water monitoring report will be made available as part of the ESIA reports which are to follow the scoping phase.
Please forward electronic version of the public document	Retha Eastes Talent Manager Office Angels Recruitment Specialists	02/07/2013	Email	The draft scoping document was forwarded.
Could you please furnish us with hard copies of the ESIA report which is for public review?	Mr E Honiball E.J. Honiball Attorneys / Prokureurs	02/07/2013	Email	The Draft Scoping report was made available to Mr Honiball.
<b>10 ALLEGATIONS MADE AGAINST PLATREEF</b>				
The community activists who were against mining activities by Platreef have now been employed by Platreef. Is this a way of silencing them?	Mr Hussein Kopole Masehlaneng	01/12/2013	Mmadikan a Sport Ground Public	Platreef does not discriminate, and if anybody were to seek employment, their applications would go through a fair recruitment process.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Development Committee		Meeting	
Platreef is dishonest, the people were told that the Mokopane mine will be the same as the Rustenburg mines, but that does not seem to be the case.	Mr Seli Maleka Ga -Madiba	01/12/2013	Mmadikana Sport Ground Public Meeting	The mine belt in Mokopane will be much bigger than the one in Rustenburg but the mine will operate in the same fashion as the mines in Rustenburg because they are both platinum mines.
The money that should be received by communities has gone to the Chief that is why he is not in the meeting.	Mr Tshepo Maponya Sekgakgapeng	01/12/2013	Mmadikana Sport Ground Public Meeting	The allegation is unfounded. The Chief was invited to attend the meeting.
The black people working for Platreef are serving their own interests instead of ensuring that their people benefit and are treated justly.	Mr Tshepo Maponya Sekgakgapeng	01/12/2013	Mmadikana Sport Ground Public Meeting	This allegation is unfounded.
Platreef sent out people to shoot community members.	Mr Frans Mphele Masesetjane	01/12/2013	Mmadikana Sport Ground Public Meeting	Platreef denies this allegation. In the event of civil uprisings, the company reserves the right to take reasonable measures to protect the lives of its employees and contractors and to protect its property.
Platreef is not honest with the communities, at the Chamber of Business meeting no questions were allowed, why is that? This raises a concern on the level of honesty.	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	Platreef denies the allegation of dishonesty. A range of meetings have been held with the Public as part of the ESIA process as well as Platreef's own stakeholder engagement and time is always provided for questions and answers.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
We hear the rumour that the mine gives somebody cash. Was this true?	Mr ?	19/11/2013	Email	This allegation is vague and need to be substantiated.
I as member of Ga Kgobudi community also Mosesetjane SANCO branch we have a problem the way Platreef behave themselves. We matched to hand over community grievances expecting Mr Johnson Platreef CEO to receive our memorandum however he never came therefore we returned with our memorandum. our relationship with Platreef is too sour we boycott any meeting of Platreef until our problems are addressed for good.	Mr Sello Kekana SANCO	05/11/2013	Email	Platreef's management is always available to engage with all stakeholders. Senior management was available to receive their memorandum.
Platreef is not honest with communities. If they were honest, they would have been already in operation. There is favouritism at the mine. The mine must stop their favouritism. If they can do things right, then they can proceed and the community will be happy.	Ms Maria Magongoa Magongoa- Zone 2	07/07/2013	Public Meeting Magongoa	This allegation is vague and need to be substantiated.
Platreef is using consultants who are in turn being used. People get irritated and become violent due to manipulation and dishonesty from Platreef.	Mr Dimpho Matlhaka Mzombane	07/07/2013	Public Meeting Magongoa	This allegation is vague and need to be substantiated.
We are concerned as to how things are being done. Platreef does not have respect for community protocols and is making it difficult for them.	Mr Isaac Nyoni Sabaha April Corporation	12/07/2013	Stakehold ers Forum Meeting	Platreef has always followed the community's protocol.
<b>11 ALLEGATIONS MADE AGAINST DIGBY WELLS</b>				
In 2011, Digby Wells was conducting door-to-door surveys during the day when most of the people are at work. They came to elderly people and saying if they don't sign, then they will not get their grant pension money.	Ms Margaret Makgabo Magongoa	07/07/2013	Public Meeting Magongoa	Digby Wells has never threatened anyone with taking away their pension. Those who have information must please come forward.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Why did Digby Wells mislead the elderly within the community?	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	Digby Wells has never misled anyone.
<b>12 LAWS, REGULATIONS AND APPLICATIONS</b>				
What the people want is for Platreef to bring along written agreements to these meetings.	Mr Kekana	01/12/2013	Mmadikana Sport Ground Public Meeting	Thank you, comment noted
The area should be re-zoned prior to commencement of mining. The area is currently used for agriculture and housing and not industrial use and therefore should be re-zoned.	Mr Honiball E.G Honiball Attorneys Representing Ga-Kgubudi, LHR and in his personal capacity	20/11/2013	Mokopane Town Public Meeting	The project area is not included in the Potgietersrus Town Development Scheme and the re-zoning process is not possible at this time. This position will be reviewed upon the promulgation of the Spatial Planning and Land Use Management Act, 2013 (SPLUMA).
Platreef announced the acceptance of the Mining Right Application (MRA) application, which other applications were submitted by Platreef to the Department of Mineral Resources (DMR) in the past year? Has the community been informed of these applications?	Mr France Makgafela Maseshlaneng	11/08/2013	Mining Right Application Public	The application being discussed today is for the mining right which was submitted to the DMR this year, but various other applications were submitted to other departments and accepted earlier in the year such as the NEMA and

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Meeting	National Environmental Management Waste Act (NEMWA) applications. The consultation for these applications was undertaken on 7 July 2013 and forms part of the consultation process of the MRA. The Bulk Sampling application was also submitted last year and is still under review with the DMR. The Integrated Water Use Licence Application (IWULA) will be submitted later in the year. All these applications will be supported by a public participation process.
The presentation listed the main laws and regulations about the project. What other laws are applicable to this project and why were they not explained in detail? What is the reason that Digby Wells did not elaborate on other legislation? Could it be attributed to being evasive about certain information?	Mr Nduma	07/07/2013	Public Meeting Magongoa	There is a team of lawyers entrusted to ensure that there is full compliance with all relevant legislation. The laws and regulations presented in Slide 16 are critical to the environmental processes. A complete list of all the laws and regulations applicable to this project is included in the Draft Scoping Report which is available for public review.
<b>13 RIETFontein FARM</b>				
Why does Rietfontein not appear in the list of farms in the mining right application?	Mr Sarel Tshamahansi	07/07/2013	Public Meeting Tshamahansi	Rietfontein does not appear because there are no mining rights or mining right application on this property, However, it forms part of NEMA application as it will be used for mine surface infrastructure.
The presentation makes mention of the farm Rietfontein? How does this area fit into the project? If the farm is to be affected by the proposed project, were there any engagements or consultation with the communities?	Mr Aubrey Langa Masehlaneng	07/07/2013	Public Meeting Magongwa	The farm Rietfontein has been included as an alternative site for the Tailings Storage Facility. The Rietfontein community was consulted.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<b>14 LAND OWNERSHIP / LAND ISSUES</b>				
The people do not object to the mining activities, all that they want is surface lease agreements in writing stating what Platreef is binding themselves to.	Mr John Magongoa Magongoa	01/12/2013	Mmadikana Sport Ground Public Meeting	The Department of Land Reform and Rural Development will oversee all consultations regarding the surface lease agreements this will be an open and transparent process.
Why did Digby Wells conduct studies on agricultural land when prospecting should be done on industrial land?	Mr Kekana	01/12/2013	Mmadikana Sport Ground Public Meeting	Prospecting can be undertaken on agricultural land. One does not need to do a rezoning during prospecting.
The community needs to understand why Platreef wants to lease the area since mining is not going to take place in the area. What will the land be used for?	Mr KJ Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	The TSF is planned on Rietfontein and pipeline will go through the Tshamahansi area. Power lines to the mine will also be going through the area and a future ventilation shaft is also planned to be placed on the Tshamahansi fields. This is why Platreef wants to lease the property.
Platreef must engage with Tshamahansi regarding the Rietfontein land to ensure that the land stays available to build a TSF. The community does not want to stop the envisaged activities but want to ensure that the Platreef and Tshamahansi plans do not clash.	Mr KJ Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	The price of Platinum dictates whether a resource will be mined or not. But the person with the prospecting right and possible mining right at the moment is Platreef and only they will be able to decide if and when the resource at Tshamahansi will be mined.
The land belongs to the chiefs and is thus communal land. The prospective farmers in the community will also be affected by the loss of grazing land. These are the people who are not currently farming but might plan to start farming in the future. Although	Mr KJ Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	The Platreef project is being done in compliance with the IFC Guidelines. According to these guidelines Platreef must compensate the affected

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
they do not require land now, they could in future.				people.
Lease agreements were not addressed in the presentation and this is a major issue and there have been disputes as to who is responsible for signing the lease. Platreef has not acknowledged the community member's individual rights and that should be done during the lease agreements.	Mr Honiball E.G Honiball Attorneys Representing Ga-Kgubudi, LHR and in his personal capacity	20/11/2013	Mokopane Town Public Meeting	The lease agreements will be addressed after the prospecting is complete and the process will be guided by the Department of Rural Development.
People do not understand what a lease agreement is, lawyers should assist communities when signing lease agreements.	Mr Philemon Lamola Mahwelereng	20/11/2013	Mokopane Town Public Meeting	The Department of Rural Development will be handling the lease agreements, They have requested that they be notified after prospecting so that consultation with the affected parties can commence.
The Mzombane community is unhappy because it is not regarded as an affected community	Mr Thabo Morwaswi Mzombane	15/11/2013	Stakehold ers Forum Meeting	Platreef wants all affected communities to benefit equally from the project including Mzombane. Platreef proposed that there be a communal garden in Mzombane where all those who take an interest in gardening can do so, but the people of Mzombane did not support this idea. Platreef wants to empower Mzombane along with all the other affected communities.
The informal settlements are not mentioned among the communities that will be affected, will the benefits only be for those communities mentioned even though the informal settlements are within the affected boundary?	Mr Malesela Manamela Mzombane	14/11/2013	Mokopane Traditional Council Meeting	Mzombane has been included as one of the affected villages.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
It was mentioned that the land belongs to the Government. It needs to be clarified as to who is in control of the land as the land belongs to the communities? The Government is the guardian of the land not the owner.	Mr Aubrey Langa Masehlaneng	07/07/2013	Public Meeting Magongoa	The land is held in trust by the government for the communities and the communities have occupation rights for the land.
The land belongs to the people as there are individual people who have rights and how are they going to be affected needs to be clarified.	Mr Emile Honiball Community Legal Representative	07/07/2013	Public Meeting Magongoa	The impact of the mine has been assessed as part of the impact assessments undertaken for the ESIA. The Social Impact Assessment (SIA) specialist study can be reviewed for details regarding the impact of the mine.
It is indicated that 20 hectare of land is required from the fields. Considering the stockpile and other infrastructure as mentioned, the 20 hectare will not be sufficient. People rely on farming within the 20 hectare of land. Is there an alternative land available for the landowners for them to proceed with the farming activities? A lot of people within the community rely on the livestock to make ends meet.	Mr Lekau Kekana Magongoa-Community Forum	07/07/2013	Public Meeting Magongoa	The 20 hectares is the area required for the bulk sample shaft. A social impact assessment forms part of the ESIA phase. Platreef recognises that communal agricultural land will fall within the development footprint of the proposed mine. Platreef will enter into a negotiated surface lease agreement with the communities based on processes and valuation as per Government (DRDLR) requirements. The company will also be willing to compensate individuals who have informal land rights in relation to the communal land on a like-for-like basis.
The farm areas of Macalacaskop and Turfspruit are directly affected by the operation. Platreef is proposing to develop their operations across eight villages. Within the two farms, there are 17 plots. How can Platreef divide the plots? The leaders are in control of the two farms.	Mr Lekau Kekana Magongoa-Community Forum	07/07/2013	Public Meeting Magongoa	Three site alternatives including Kruspruit, Rietfontein (within project area) and Bultongfontein are being investigated as the possible location for the Tailings dam.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
There is no more land for a mine to operate on. For this reason, I am against the mine operating in this area.	Mr Molala Ga-Kgobudi	07/07/2013	Public Meeting Magongoa	The land available is enough for the mine as it will be an underground mine.
<b>15 RESETTLEMENT</b>				
Will there be any resettlement of the people of Magongoa or mining will take place while they are still there?	Mr Sello Khoza Tshamahansi	01/12/2013	Mmadikan a Sport Ground Public Meeting	Resettlement was discussed and it was concluded that there will not be resettlement because the mine will be an underground mine. The community surface infrastructure will not be affected by underground mining but there will be engagements with the people of Magongoa to discuss lease agreements.
Platreef will not talk about resettlement until the houses start cracking.	Ms Elizabeth Ngobeni Tshamahansi	01/12/2013	Mmadikan a Sport Ground Public Meeting	As explained there will be no need for resettlement.
It was mentioned that Platreef has no resettlement plan, but if there is any possibility that people will be relocated Platreef must indicate this now not when the damage is already done.	Mr Madimetja Pale Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	Prospecting began in Madiba and Tshamahansi, the plan then was for an open cast mine but after the studies were conducted, Platreef decided on an underground mine. There are people who recently moved into the mining area so that they would be relocated and compensated by Platreef. Engagements will take place with these people occupying the mining area.
Is this area of Mzombane legalised or are all the people from Mzombane area going to be moved?	Mr Ntibalata James Maema	04/11/2013	Email	The legal recognition of Mzombane is a matter for the Traditional Authority and government to address. There are currently no plans for

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				resettlement of any of the villages.
Will infrastructure placement result in people being forced out of their homes? If so, where will they go?	Mr Phothumela Ngwako	11/08/2013	Mining Right Application Public Meeting	There is currently no plan for resettlements, but should this process be required, then the International Finance Corporation (IFC) process with regards to resettlement will be followed.
If people are not relocated, will they be able to sustain their livelihoods? Where is the alternative land?	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	Initially (2004-2006) there were talks of resettlement in the proposed open pit area but since the mine plan has changed to underground mining there is currently no resettlement planned for any of the villages.
There are also resettlement issues not being addressed. Tshamahansi and Madiba villages will be relocated. Why is this not communicated to these villages?	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Initially (2004-2006) there were talks of resettlement in the proposed open pit area but since the mine plan has changed to underground mining there is currently no resettlement planned for any of the villages.
It was indicated at the first meetings that there were possible households to be resettled? When and which houses will be resettled?	Mr Donas Makhubela Tshamahansi	07/07/2013	Public Meeting Magongoa	Response as above.
<b>16 FIELDS</b>				
What will happen to the livestock that is currently in the mining area?	Mr Maluleka Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	Platreef will negotiate and enter into an agreement on the use of the surface land, which will include but not limited to economic displacement of agricultural activities.
Platreef must provide proof that payment was made for the fields because families are fighting.	Mr Jonas Makhubela Mokopane	28/11/2013	Focus Group Meeting	Platreef made the last payment in October 2013, 317 people were paid an amount of R5,250 each. Platreef has also compensated the Kgobudi

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Interested and Affected Community Development Forum (MIACDF)			Community for the use of their communal grazing lands. Payment was made on 13 December 2013.
Where will the local people obtain fire wood if the project area is fenced off?	Ms Agnes Mashilo	20/11/2013	Mokopane Town Public Meeting	The project area has very few trees. As it used to be old agricultural fields.
Grazing and agricultural fields are very important to the communities.	Mr Philemon Lamola Mahwelereng	20/11/2013	Mokopane Town Public Meeting	Platreef will negotiate and enter into an agreement on the use of the surface land, which will include but not limited to economic displacement of agricultural activities.
The people of Magongoa have received some compensation for the use of their land but the people of Ga Kgobudi have not, why is that?	Mr Samuel Makhanda Makhanda Trading & Projects PTY LTD	15/11/2013	Stakeholders Forum Meeting	Platreef has compensated the Kgobudi Community for the use of their communal grazing lands. Payment was made on 13 December 2013.
Where will the animals be kept while Platreef is looking for an alternative farm to keep the animals?	Mr Samuel Makhanda Makhanda Trading & Projects PTY LTD	15/11/2013	Mr Samuel Makhanda	Platreef will negotiate and enter into an agreement on the use of the surface land, which will include but not limited to economic displacement of agricultural activities.
What will happen to the soil used to grow mielies if it is affected by the chemicals used in the mine?	Ms Josephine Madiba Kgoro Ga-Madiba	14/11/2013	Mokopane Traditional Council Meeting	The soil outside of the mining area will not be affected by the mine.
How did Platreef come to the amount that was paid for the mielie fields?	Mr Aubrey Langa	11/08/2013	Mining Right	Valuation was done by independent valuers, who valued the land at far less than what



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Masehlaneng		Application Meeting	Platreef agreed to pay. An agreement was reached to pay R5250 per mielie field. Platreef will negotiate and enter into an agreement on the use of the surface land, which will include but not limited to economic displacement of agricultural activities.
Was compensation for the mielie fields an once off payment?	Mr Phothumela Ngwako	11/08/2013	Mining Right Application Public Meeting	Payments were not once-off. An agreement was reached to pay R5250 per mielie field for every ploughing season, where disruption to agricultural activities has occurred. Platreef recognises that communal agricultural land will fall within the development footprint of the proposed mine. Platreef will enter into a negotiated surface lease agreement with the communities based on processes and valuation as per Government (DRDLR) requirements. The company will also be willing to compensate individuals who have informal land rights in relation to the communal land on a like-for-like basis.
Platreef was told that the Department of Rural Development must be present at all meetings in order to understand and evaluate the communities' agricultural fields before any compensation is provided to communities. Now, the compensation process is being conducted illegally and people are given money whilst others are struggling. This is not right.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	The Department of Rural Development has been engaged to assist with the compensation process and are invited to attend all meetings.
When we speak of our fields, these fields have already been affected by the poison from the mine. What will the communities	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum	A Health Impact Assessment was undertaken as part of the EIA phase investigated what the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
eat?			Meeting	health impacts of the mine will be. A Social Impact Assessment forms part of the EIA phase and investigated what the social and economic impacts of the project will be.
This is our land and we do not have mining at heart as the fields are our means to make a living.	Mr Isaac Nyoni Sabaha April Corporation	12/07/2013	Stakeholders Forum Meeting	Platreef recognises that communal agricultural land will fall within the development footprint of the proposed mine. Platreef will enter into a negotiated surface lease agreement with the communities based on processes and valuation as per Government Department of Rural Development and Land Reform (DRDLR) requirements. The company will also be willing to compensate individuals who have informal land rights in relation to the communal land on a like-for-like basis
Digby Wells went door to door to register people, even threatening the elders that if they do not sign, their pension will be taken away. After that, there were photos taken and recommended that people be paid R5 250.00 allowances as part of the compensation. This is our land. Who gave them permission to access the fields? We want the proof that the Chief gave permission. Where are those that gave them the permission to do house-to-house surveys for the fields? Digby Wells came to my farm and said that they came to record the field. No feedback has been provided when it was asked who sent Digby Wells.	Ms Mama Kgao	12/07/2013	Stakeholders Forum Meeting	Digby Wells was appointed by Platreef to register the fields for compensation purposes. The registration was conducted in 2011-2012. In terms of the agreement, people were called by the headmen. Digby Wells then registered the fields with inputs from the headmen and from the field owners. Digby Wells has never threatened anyone with taking away their pension monies. If there are outstanding issues these need to be raised with the Platreef Corporate Social Responsibility office in Mokopane.
In 2011, the fields were already polluted but the consultants say they have done monitoring?	Ms Mama Kgao	12/07/2013	Stakeholders Forum	The studies to investigate impacts on the fields forms part of the EIA phase to determine the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Meeting	impact of the mine on the field area.
I am the child of the fields and animals and do not have education. I have been working in the fields since 1998 and have all the particulars and records of the fields. Since Platreef has come, they have only brought problems. I also have workers who work in my fields and harvest 120 mielie bags each season. My children will not be able to go to work and I have told the employees to go home due to having no work for them as the fields have been affected. Platreef knows how to irritate and manipulate us using the Kgoros. When you have given me R1000.00 it does not mean I agree and when you come again and give me R2000 it does not mean I have agreed. When you come again, you will only annoy me. Platreef only came into the area recently and we have been here for a long time. The mine has divided the community. We as the people of Mokopane must stand together and be happy as we have the needed support from Mr Honiball. It does not mean that because you are educated you understand.	Ms Joyce Kekana Mamotsope	12/07/2013	Stakeholders Forum Meeting	The comment is noted.
It was also indicated that the people must be paid for the loss of their fields and impacts caused by the prospecting activities.	Mr Sello Kekana	07/07/2013	Public Meeting Magongoa	The affected field owners have been paid for their fields. The rate of compensation was determined looking at the yield of the mielie fields and the value is to compensate the owners for the loss of harvests. Impacts caused by drilling are addressed in the prospecting EMP and impacts not covered by the EMP are addressed on a cases-by-case basis.
In March 2012, a team from Digby Wells came to her field and she asked what they wanted and that they must show her who	Ms Margaret Makgabo	07/07/2013	Public Meeting	Identification of the fields was done with the headmen and the affected field owners. The field

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
has sent them to her fields. She then indicated that they must come back again, until today this has not been done.	Magongwa		Magongoa	survey is complete if there are still disputes this needs to be taken up with Platreef Community and Social Responsibility Office.
How is it possible that they can continue without the issuing of compensation for the affected fields has been resolved? Why were some individuals paid R10 000 and others were not?	Ms Maria Magongoa	07/07/2013	Public Meeting Magongoa	The affected field owners have been paid for their fields. The rate of compensation was determined looking at the yield of the mielie fields and the value determined is to compensate the owners for the loss of harvests.
We have been working with Digby Wells during the agricultural survey and they promised employment at the mine. They were employed for a week and indicated that they will come back, but now Digby Wells is continuing without local people. This is unfair. Digby Wells must do things correctly.	Ms Maria Magongoa	07/07/2013	Public Meeting Magongoa	The agricultural survey was a short term contract to assist Platreef with identifying filed owners. Digby Wells employed people on a temporary basis to assist with the survey.
I am also entitled to the R10 000.	Mr Kgaugelo	07/07/2013	Public Meeting Magongoa	The comment is noted, it would need to be verified whether Mr Kgaugelo is entitled to R10 000.
People have come here since 1965 and my grandfather came here since 1967 (43 years). Why are they not being compensated for their fields when other people have been paid three times?	Mr Robert Member of MIACC	07/07/2013	Public Meeting Magongoa	The issue of compensation is being investigated with the DRDLR and Platreef will try to resolve the outstanding issues.
<b>17 INFRASTRUCTURE</b>				
A tailing dam is very dangerous, if it fails lives will be in danger yet there is no relocation plan.	Mr Jonas Makhubela MIACDF	28/11/2013	Focus Group Meeting	The tailings dam is designed in such a way that it will not fail.
It is unclear on the map where the stock piles and tailing dams will be located.	Mr Jonas Makhubela	28/11/2013	Focus Group	Please remain after the meeting so that this can be explained on the maps available.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	MIACDF		Meeting	
Where will the waste be dumped?	Mr Lesiba Kgonyane Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	<p>There are 2 proposed dump sites. The waste rock berm to be situated on the outside of the mining area. The berm will shield people from the mine. A landfill site will be constructed for the domestic waste and has a life span of approximately 35 years.</p> <p>There is also a tailings waste dam called a tailings storage facility (TSF), this is the waste from the plant. The waste is very fine. Four sites were investigated for the waste of which two are fatally flawed. The Rietfontein and Bultongfontein sites are being investigated further. The studies will inform of the final decision of which site or sites to use.</p>
How will the power supply to Mokopane town be affected in terms of load shedding?	Mr Ken Goelst Keus Trust	20/11/2013	Mokopane Town Public Meeting	<p>During the construction phase the 5MVA rural power line from the Mokopane substation will be used for power supply. It will be used for approximately 2 years until the proposed 75MVA power line from the Medupi power station has been constructed.</p> <p>During the operational phase the 75MVA dedicated power line from the Medupi power station will be used to supply power to the mine. The proposed mine will therefore have no impact on the local power usage.</p>
How tall will infrastructure be and how much light will there be at night?	Ms Hilary Knight Mokopane	20/11/2013	Mokopane Town	This is presented in the EIA Reports.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Chamber of Business		Public Meeting	
How will the mine assist the municipality in upgrading the infrastructure to accommodate the additional industrial use that it has not been designed to carry?	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	Platreef is in contact with the municipality to prepare the municipality for the additional industrial use.
We would like detailed information and final positioning of among others the tailings, slimes dams, accommodation, office blocks etc. Bearing in mind that the infrastructure, including transportation, electricity provision and general services is currently designed to support a village community we insist on detailed plans and commitments on how the mine will cater for its requirements in this regard.	Mokopane Business Chamber	19/11/2013	Email and Letter	The infrastructure layout is included in the EIA. The mine will not be using the villages' water or electricity or other services but will have its own dedicated services.
The infrastructure of the town is funded by taxes collected from rate payers. Since the mining and related activities will be detrimental to the infrastructure designed to cater for agriculture, it is clear that the mine will have a devastating effect on this infrastructure as can be seen in the Stofberg- Rossenekal area. As rate payers in this municipality we insist that the applicant commit to upgrading facilities and infrastructure in order to accommodate activities both in the vicinity of the mining site and in town. We require that the applicant include in their application process such required upgrades. This includes roads, electricity and other utilities, both to accommodate the new influx, but mostly as it is a safety concern for the community.	Mokopane Business Chamber	19/11/2013	Email and Letter	The local community will benefit from sharing the infrastructure developed for the purpose of the mine's activities.
We would like a clear indication of exactly where smelting and refining of the metals will take place.	Mokopane Business Chamber	19/11/2013	Email and Letter	At this stage of the development of the mine it cannot be determined where the concentrate will be smelted as the mine is still a few years away

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				from production.
Where will the waste rock be stored?	Mr Maluleke Tshamahansi	17/11/2013	Tshamahansi Public Meeting	It will be placed on the mine boundary and will be used as a noise berm. There will also be a waste rock dump within the mining area.
Please provide more detail for the boundary of the waste rock as well as the noise berm.	Mr Joshua Mojela Mosesetjane Ga-Sekgoboko Development	15/11/2013	Stakeholder Forum Meeting	There will be an opportunity after this session for all those who are interested to be taken through the posters on the wall, the posters show the exact location of the infrastructure. The information is also contained in the EIA.
Where will the dumping site be situated?	Mr Thabo Morwaswi Mzombane	15/11/2013	Stakeholders Forum Meeting	Platreef is consulting with all the people whose land might be affected but investigations are still underway for the dumping site.
Where will the dynamite and other hazardous materials be stored?	Ms Jane Kekana	14/11/2013	Mokopane Traditional Council Meeting	The EMP outlines how and where dynamite and other hazardous chemicals will be stored and how they will be handled.
Where will the waste dumps be situated?	Ms Jane Kekana	14/11/2013	Mokopane Traditional Council Meeting	The waste dumps will be situated within the mine fence. The dump will be 10 meters high but will be shielded from the community by the waste rock which will be placed along the edge of the mining property which will also be 10 meters high.
Should a Smelter be needed in future, what will the plan of action be?	Mr Dudu Phuti Mosodi	11/08/2013	Mining Right Application Public	At this stage, Platreef will not build its own smelter but might build one in the future. Should it be decided to build a smelter, environmental authorisation will be required, including

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Meeting	consultation with I&APs. This is outside of the processes being dealt with today.
Where will the rock dump be situated?	Mr Ngoveni Tshamahansi / Hlongwane	07/07/2013	Public Meeting Tshamahansi	The waste dumps will be situated within the mine fence. The dump will be 10 meters high but will be shielded from the community by the waste rock which will be placed along the edge of the mining property which will also be 10 meters high.
During the first meeting, it was requested that the location of the supporting infrastructure be clarified in detail during the studies. This includes the location of workshops, offices, tailings dam. We want to know what negative impacts can be expected. When we ask for information from Digby Wells, we do not get it.	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	The specialist studies undertaken for the ESIA will assist to determine where the rock dump and other infrastructure will be situated. This information will be included in the ESIA reports to be made public during the next round of public engagements.
<b>18 DRILLING / PROSPECTING</b>				
Drilling is taking place in Tshamahansi but nobody has been compensated	Mr Jonas Makhubela MIACDF	28/11/2013	Focus Group Meeting	Comment noted this will be investigated.
What is happening at the farm which belongs to the former Anooraq now Atlatsa companies? Why are the Platreef drilling machines working there?	Mr Percy Mtileni Tshamahansi	17/11/2013	Tshamahansi Public Meeting	Platreef has an agreement with Atlatsa to do exploration drilling on the Rietfontein farm.
What happened to the drilling in Tshamahansi? The people want to drill boreholes at their homes, how do they know that the underground water is not polluted from the exploration drilling?	Mr Kenneth Ribisi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	The shaft will be sealed off; monitoring has been implemented to detect any changes to water quality that might occur as a result of mining. There should be no pollution of underground water.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
My comment somehow is misinterpreted: The manner in which Platreef Prospecting undertaken, no free prior informed consent of community.	Mr Sello Jonas Kekana SANCO Mosestjane	04/12/2013	Fax	Platreef has been prospecting for over 15 years and has consulted extensively with the communities during this period.
Why is the prospecting right information a secret?	Mr J Manamela Mzombane	15/11/2013	Stakeholders Forum Meeting	Platreef listed as a public company in 2012. All material information, including prospecting right information, is publically available on the company website.
Was there an extension to the original Prospecting Right for additional minerals	Mr France Makgafela Maseshlaneng	11/08/2013	Mining Right Application Public Meeting	The application process for the prospecting right is to first submit an application, and comply with the consultation requirements of the application. If any other minerals are found in the area and the mining company is interested in prospecting for these minerals an amendment to the application can be made and a consultation process would need to be followed.
Platreef is prospecting in our area and affecting animals, plants and ritual grounds. The trees of our ancestors are being destroyed. These are used for traditional medicines. The traditional healers are now providing medicines that are poisonous. Why is Digby Wells only commencing with the studies now when they have been involved in this project for a long time. The damage done has already been felt by the communities.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	The prospecting activities are regulated by an Environmental Management Plan (EMP). The specialist studies for the ESIA address the issues being raised such as medicinal plants and heritage issues.
The manner in which the Platreef prospecting activities have been undertaken has not been satisfactory to the affected communities.	Mr Sello Kekana	07/07/2013	Public Meeting Magongoa	Previous mistakes were made, but Platreef wishes to conduct prospecting according to the law. The DMR had granted the prospecting right and the community was in agreement with the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				mining operation. With regard to the Department of Land Affairs enquiry, a representative from the department is present but he could not attend all the weekend meetings due to other commitments
When they started the prospecting activities, there were people who benefited and others suffered at the cost of the mine.	Ms Maria Magongoa Magongoa-Zone 2	07/07/2013	Public Meeting Magongoa	The statement needs to be clarified.
The mine indicated that they came for consultations during prospecting, but did not.	Mr Machau Mzombane	07/07/2013	Public Meeting Magongoa	Extensive consultation took place around the Bulk Sample application and is included in this application documentation.
The community indicated that the drilling machines must not come back until the compensation for the fields is completed.	Mr John Chauke Tshamahansi	07/07/2013	Public Meeting Magongoa	The drilling was stopped under conditions of the Section 93. These conditions have now been met and therefore the drilling may proceed.
Platreef brought the drilling machines back by force. The machines are back now without resolving issues raised by the communities. Who did Mr Motswaledi agree with to bring the drilling machines back into the area?	Mr John Chauke Tshamahansi	07/07/2013	Public Meeting Magongoa	The drilling was stopped under conditions of the Section 93. These conditions have now been met and therefore the drilling may proceed.
The drilling machines must stop operating by end of the day.	Mr Kenneth Tshamahansi – member of MIACC	07/07/2013	Public Meeting Magongoa	The drilling machines will continue to operate as Platreef has permission to do so from the DMR.
<b>19 MINING</b>				
Why is Platreef not talking about beneficiation?	Mr Kekana	01/12/2013	Mmadikan a Sport	At this stage the concentrate will be sold to a smelter for beneficiation.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Ground Public Meeting	
<p>Tshamahansi wants to understand how Platreef is advancing with the geology studies. The reef around the Tshamahansi area can only be mined opencast and the reef dips across the N11 by 700m and allows for underground mining, Platreef must share the information regarding future plans and expansions etc. so that the community of Tshamahansi knows what to expect in future.</p> <p>Geological reports and information have been shared with Tshamahansi in the past and the request is that this information sharing process continues.</p>	Mr KJ Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	<p>A surface outcrop is present at Tshamahansi and can only be mined opencast.</p> <p>During the exploration process the deeper platinum was discovered in the area to the west of the N11. This area has much more platinum than to the east of the N11.</p> <p>The reef to the west of the N11 is approximately 40m thick. To put this in perspective, the average thickness of platinum in South Africa is approximately 20cm.</p> <p>The documentation submitted to apply for finance only includes information on the deeper platinum resources. The shallow platinum is not that economical to mine and is thus not part of the future plans for now.</p> <p>Early 2014 the bulk sample shaft sinking will start in order to take a sample of the ore for further testing which will confirm what the exploration drilling has indicated to date. The bulk sample shaft is part of the exploration stage. Once the mining right is granted then fences will be put up, the estimated time is end for the end of 2014 and the next shaft sinking will commence. It takes 5 years to sink a shaft.</p> <p>In 2018/2019 the platinum stockpiling will commence and in 2020 the processing of platinum will commence.</p>
It was mentioned that the platinum found in Tshamahansi was of the best quality and that it would only be mined open pit and not	Mr Percy Mtileni Tshamahansi	17/11/2013	Tshamahansi	It was decided by Platreef after several studies that have been conducted that the mine will only be an underground mine as the findings of the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
underground, the community requests that it be updated in this regard.			Public Meeting	studies indicated that the impacts from underground mining will be much less compared to open cast mining.
<p>We support the mining of underground mining because of the following reasons:</p> <p>1. We understand that the miner, does not mine everywhere, but only where the mineral is situated</p> <p>2. Again the miner does not secure a bigger space, to disturb the community to continue with their daily lives activities.</p>	<p>Edith Ngobeni (Chairperson)</p> <p>M.J Langa (Secretary)</p>	02/09/2013	Email and letter	The comment is noted and the statements are correct.
During the court proceedings held at the Pretoria High Court, there was an agreement that the operations must not encroach on the 200 meter buffer of the communities.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	Legally this is correct and Platreef will not encroach within 200m of the communities.
Will the mine be an underground mine? Concerned about the cracking of houses due to blasting activities, noise impacts from the mining activities and visual impacts.	Mr Jan Mokoena Masodi	07/07/2013	Public Meeting Magongoa	<p>The operation will be underground mining, approximately 1 km below the surface. There will be no noise or vibration impacts anticipated as a result of blasting from the underground mine activities.</p> <p>The supporting infrastructure such as the mining shaft head gear and moving of mine vehicles will be visible to the communities and may cause a visual impact in the area.</p> <p>An assessment to determine whether there are existing cracks in houses and the potential impacts of blasting will be undertaken. The communities are encouraged to communicate with mine management and report any house cracks if they occur due to mining activities.</p>
What minerals will be mined?	Mr Lekia	07/07/2013	Public	Platreef proposes to mine primarily Platinum,

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Youth Member Masodi		Meeting Magongoa	Palladium, Rhodium, Gold and Nickel.
<b>20 SPECIALIST STUDIES</b>				
Please provide more information on the baseline studies conducted.	Ms Mokonyane Linah Victim Support Centre Mahwelereng/ Majalla Trading/CSF	20/11/2013	Mokopane Town Public Meeting	This information is included in the EIA reports.
The Draft EIR mentions that some things will/might still be done. When will the last specialist reports be completed and will the I&APs have opportunity to comment further on the final reports?	Mr Honiball E.G Honiball Attorneys Representing Ga-Kgubudi, LHR and in his personal capacity	20/11/2013	Mokopane Town Public Meeting	The specialist studies are complete with the exception of the Ground Water study. This will be included in the final EIA which will be made available to the public for comment.
Which baseline studies have been done in the area by specialists?	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	The baseline studies have been undertaken as per the EIA.
The Chamber is concerned about that the cumulative effect on the area should the current activity as well as new mines become an eventuality be investigated and reported on. The cumulative effect of these different mining activities should be included in the reports. We would like the cumulative effect be investigated in terms of at least the socio-economic impact,	Mokopane Business Chamber	19/11/2013	Email and Letter	The cumulative impacts are assessed as part of the EIA.

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environmental impact and transport.				
With Reference to the document you circulated, "Background Information Document for the Proposed Platreef Underground Mine Near Mokopane." According to this document you are busy with three issues that concerns us, being the Hydrology Assessment; Aquatic Ecology and the Noise Assessment.	Wena Goelst 65 Uitloop Percy Fyfe Road Mokopane	16/09/2013	Email	These studies form part of the EIA and the results of these studies can be found in the EIA.
<b>21 BIODIVERSITY</b>				
What will happen to the indigenous plants and animals found on the site? How will this be managed and how will the children get to know these plants and animals if they are destroyed?	Mr Lesiba Kgonyane Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	If there are any indigenous plants that need to be removed then special permits will be applied for from the relevant authorities. The medical plants were identified with a traditional healer from the community.
What impact will the mining activities have on medicinal plants?	Mr Maluleka Tshamahansi	28/11/2013	Tshamahansi Leadership Meeting	The medicinal plants will be removed.
We once again refer to Andy Gubb's report, and on page 13 of this report Biodiversity and conservation importance of the area. With this in mind we request that the EIA extensively investigate the effects of the mining operation on the sensitive area.	Mokopane Business Chamber	19/11/2013	Email and Letter	The EIA extensively investigated the impacts of the mine on the sensitive areas.
The section of the floodplain centred on the Nylsvley Nature Reserve was declared a Ramsar site in 1998. It was a research site for the internationally acclaimed Savannah Biome Programme (1974 –1989).	Mokopane Business Chamber	19/11/2013	Email and Letter	It must be noted that the report refers in particular to the Nylsvley floodplain system and not directly to the study area proposed to be mined. It is indicated in the report on page 19 that the dam at Mokopane is responsible for the back-flooding of the floodplain.
The ecological status of the floodplain is being increasingly	Mokopane	19/11/2013	Email and	This is noted, but it must be kept in mind that the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
threatened by upstream development and water abstraction (Rowberry, 2011)	Business Chamber		Letter	proposed mining operation is downstream of the floodplain, which has been indicated in the specialist report.
The Waterberg Biosphere Reserve lies to the west of the Nyl/Mogalakwena River valley. This UNESCO-recognised biosphere reserve was proclaimed in 2001 and is the only savannah biosphere reserve in the world. Through providing linking corridors, the Waterberg Biosphere Reserve provides opportunity to promote the protection of the Nyl/Mogalakwena River valley and its catchment, which occurs in the Waterberg.	Mokopane Business Chamber	19/11/2013	Email and Letter	The project footprint area is not to the west of the floodplain system and as a result planned corridors will not be affected.
We would like the report to include the long term effects of the use of mining in this environment.	Mokopane Business Chamber	19/11/2013	Email and Letter	The EIA addresses the mining project through all its phases of development from construction through to decommissioning.
We would like the reports to explain in detail what the potential pollutants will be, and to be explained in lay terms to the community so that we can understand the risks involved with building these structures. We would like to understand exactly how pollution from these processes will be eliminated.	Mokopane Business Chamber	19/11/2013	Email and Letter	This is dealt with in detail in the EMP developed for the mine.
We would also like the applicant to give guarantees that should pollution occur, that the pollutants will be shut down. We would also like a fund to be established in advance in the event of pollution, so that immediate rehabilitation can take place	Mokopane Business Chamber	19/11/2013	Email and Letter	Platreef is committed to not allowing any pollution from its activities and should pollution occur the company will take immediate action. The mine as part of its Mining Right Application needs to make provision for a rehabilitation plan which will start to be implemented from construction of the mine through to decommission.  At the execution of the mining right, Platreef will make financial provisions available as required in its EMP.

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What will happen to plants and animals that are in the mining area?	Mr Kenneth Ribisi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	The mining area will be fenced off and where the mining infrastructure will go the plants and animals will be removed, the areas where the infrastructure will not be will be protected by the fence.
What is the mitigation plan for animals?	Mr J Manamela Mzombane	15/11/2013	Stakeholders Forum Meeting	As indicated in the presentation the mitigation plan is to disturb as little of the land as possible.
Some plants are used for medicinal purposes and this project poses a risk to these plants. Biodiversity (Act 10 is cited). All indigenous trees and plants with medicinal value should be considered. Traditional healers should be consulted to assist in identifying these plants	Mr Thako Leseke Mahwelereng Youth Council	11/08/2013	Mining Right Application Public Meeting	A vegetation study forms part of the EIA phase and identifies plant species including medicinal plants.
Are there any protected areas located within the project area?	Mr Percy Mtileni Tshamahansi	07/07/2013	Public Meeting Tshamahansi	We are only aware of a game reserve located nearby the project area.
Digby Wells must investigate the impacts on the existing animals and plants in the communities.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	These impacts are to be investigated as part of the fauna and flora specialist study.
<b>22 CULTURAL HERITAGE</b>				
The Chamber is also concerned about possible degradation of the cultural heritage of the area and calls for the recommendations made below be implemented. These are that:	Mokopane Business Chamber	19/11/2013	Email and Letter	A heritage impact assessment has been completed and submitted to the South African Heritage Resources Agency and the Limpopo Provincial Heritage Resources Authority (Case ID: 566). SAHRA has issued Final Statutory Comment on 8 November 2013 in terms of



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				Section 38(8) of the NHRA with specific requirements concerning identified cultural heritage. All recommendations made in the HIA and required by SAHRA in terms of the Statutory Comment issued will be adhered to.
A surface collection of Stone Age material in the area be undertaken in order to obtain a representative sample of material. A permit for this action will be required from the South African Heritage Resources Agency, with the work to be carried out under the supervision of a Principle Investigator for Stone Age as accredited at the Association of Southern African Professional Archaeologists.	Mokopane Business Chamber	19/11/2013	Email and Letter	This did not form part of recommendations contained in SAHRA Final Comment on the HIA, however the issue is noted.
An architectural historian be contracted to assess the significance and ages of any historical structures that might be earmarked for demolition and that his or her recommendations be implemented.	Mokopane Business Chamber	19/11/2013	Email and Letter	Any historical building that may be of significance will be subject to a Phase 2 built in addition to a NHRA Section 34 permit application process prior to any alteration or demolition taking place
All graves and graveyards located in the area be fenced-off, cleaned and access provided to family members / descendants who might wish to visit the graves. A Graves Management Plan should also be implemented. Should it not be possible to preserve the grave site then it should be exhumed and relocated, taking into consideration all the legal requirements and processes involved in the relocation of graves.	Mokopane Business Chamber	19/11/2013	Email and Letter	The SAHRA Burial Grounds and Graves Unit will only support relocation of burials in the Operational Area and the Alternative Plant Area if it is not feasible or practical to retain the identified graves. The developer will have to provide proper motivation for relocation. Where grave relocation is necessary this will be undertaken under a NHRA Section 36 permit that will be applied for in terms of Sections 38 to 49 of the NHRA Regulations, inclusive of consultation with bona fide next-of-kin.  SAHRA further required that a Conservation Management Plan development be developed for

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				grave sites that are to be retained in situ in addition to other heritage resources identified in the HIA. Grave sites 60 years or older in these areas will have to be cleaned, fenced and access gates installed to allow visits from relatives and family friends.
The subterranean presence of archaeological and / or historical sites, features or artefacts is a distinct possibility. Care must therefore be taken during any development activities and if any of these are discovered, a qualified archaeologist must be called in to investigate	Mokopane Business Chamber	19/11/2013	Email and Letter	SAHRA Comment on the HIA stated that if any archaeological/palaeontological or any other heritage resource is uncovered during the course of construction activities SAHRA APM Unit If the newly discovered heritage resource is considered to be significant a rescue excavation may be required at the cost of the developer. Digby Wells has prepared Chance Find Procedures that must be implemented by Platreef in the event that subsurface heritage resources are found.
<b>23 GRAVES</b>				
How will graves be affected by the mining activities if the mine is 800 – 1 000m deep?	Ms Mokgatla Mzombane	20/11/2013	Mokopane Town Public Meeting	Because the mine is so deep it will not impact on graves.
What will happen to the affected graves?	Ms Welminah Ngoveni Tshamahansi	17/11/2013	Tshamahansi Public Meeting	Heritage specialists are trained and know what to do in this regard, first the specialist go to site and search for graves that might be affected the graves are identified and marked. The families are then consulted and the necessary steps and rituals are undertaken before the graves are relocated.
The issue of graves is a sensitive one because people from	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane	Digby Wells is working hand in hand with the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
urban areas do not understand the cultures and rituals of the affected communities.			Traditional Council Meeting	South African Heritage Resources Agency (SAHRA). All grave sites will be identified and marked and feedback given to SAHRA. The authorities will be consulted to request permission to relocate the graves. Once this is done, the affected families will be consulted. Thus, there will be no relocation of graves without consultation and agreement with the affected families. The necessary rituals and cultural practices will be followed.
Platreef wants to build a dam on the graves. Requests details of what will happen to the old graves at Makoka, Lejwana, Motlwathwa commentary.	Mr Lekau Kekana Magongoa-Community Forum	07/07/2013	Public Meeting Magongoa	Digby Wells is working hand in hand with the South African Heritage Resources Agency (SAHRA). All grave sites will be identified and marked and feedback given to SAHRA. The authorities will be consulted to request permission to relocate the graves. Once this is done, the affected families will be consulted. Thus, there will be no relocation of graves without consultation and agreement with the affected families.
What benefits will be received by the families whose graves will be resettlement?	Mr Machau Mzombane	07/07/2013	Public Meeting Magongoa	There will be no benefits for the families of the graves to be resettled; however a consultative process will be followed for the relocation of the graves.
<b>24 AIR QUALITY</b>				
Mining is always associated with dust and this will have a negative impact on the community.	Mr Percy Motileng MCO Chairperson	20/11/2013	Mokopane Town Public	Control measures are in place to mitigate dust, roads will be paved and dust suppression will take place

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			Meeting	
The impact of dust is a concern. I am asthmatic and the mine will affect my health.	Ms Mokgatla Mzombane	20/11/2013	Mokopane Town Public Meeting	Control measures are in place to mitigate dust, roads will be paved and dust suppression will take place.
Will there be diseases caused by the mine, like what happened at the asbestos mines in Kimberly?	Mr RS Manganyi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	The air quality study indicates that there will be minor dust impacts after mitigation measures. Underground platinum mining also does not cause asbestosis.
We would also like to know how the mine will influence our breeder chicken farm with noise & air pollution and security (crime).	Mr Kenneth Goelst 65 Uitloop, Percy Fyfe Road, Mokopane	02/11/2013	Email and Registrati on form	The mine is situated far from the farm and there should be no air quality impacts felt at the farm.
They must first tar the road to minimize the air pollution that can be harmful to the community due to their gases and dusty roads they use. They must also assist members of the community financially, if they become ill/affected due to their gases, for medical treatment.	Edith Ngobeni (Chairperson) M.J Langa (Secretary) Mogalakwena Faith and Hope Foundation	02/09/2013	Email and Letter	An air quality study forms part of the specialist studies undertaken for the EIA. A health impact assessment also forms part of the studies undertaken for the EIA.
We are concerned about the negative impact dust might have on the community.	Mr Thako Leseka Mahwelereng Youth Council	11/08/2013	Mining Right Applicatio n Public Meeting	A dust impact assessment forms part of the EIA and will include mitigation measures to address the impacts of dust
Which route will the trucks use to access the site and what will	Mr Dudu Phuti	11/08/2013	Mining	The main road (N11) will be used to access the

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
be done to manage dust caused by vehicles?	Mosodi		Right Application Public Meeting	site and the traffic impact assessment has made recommendations regarding traffic management. A dust impact assessment forms part of the EIA studies and provide mitigation measures for dust caused by vehicles.
The dust that they are saying will be mitigated is already affecting the communities.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	A dust impact assessment forms part of the EIA specialist studies to determine the impact of dust on the environment and people. The study provides mitigation measures to be included in the EMP.
Will dust from the mining area / activities cause diseases?	Mr Khazamula Ngoveni Maceke	07/07/2013	Public Meeting Tshamahansi	A detailed air quality impact assessment has been undertaken as part of the EIA and determined the air quality as well as potential dust which mining operations may cause.
<b>25 SURFACE WATER</b>				
But we ask the miner to consider the following facts when mining: When they released their polluted water, they must not close river banks, because animals depend on river water for survival, they can die from dehydration without water.	Edith Ngobeni (Chairperson) M.J Langa (Secretary) Mogalakwena Faith and Hope Foundation	02/09/2013	Email and Letter	The mine will not release polluted water into the environment and will also not be changing the river banks.
Mentioned is made of the Lebalelo Users Association and how will the community benefit from the water being supplied to the mine?	Mr Thako Leseka Mahwelereng Youth Council	11/08/2013	Mining Right Application Public Meeting	The focus at this point is to determine how water will be supplied to the mine for the operations. How the community may benefit from the water being supplied has not been determined at this stage.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
The community requires information pertaining to water. What will be the strategy to ensure minimal impacts on the river systems in the area – avoid water pollution? Particularly how water pollution in Mogalakwena will be prevented.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	A detailed surface water study is part of the EIA studies recommendations are made in the EMP to manage the potential for water pollution. A water monitoring and management program will be implemented. One of the focuses of the studies and management plans is on the Mogalakwena river.
<b>26 GROUND WATER</b>				
The lowering of the water table will impact on ground water, is there a mitigation plan?	Mr Kekana	01/12/2013	Mmadikana Sport Ground Public Meeting	The shaft will be sealed off so that no water leaves or enters the shaft there should be no impact on ground water.
The impact assessment findings on groundwater are not in the presentation and it is a major concern to the Business Chamber.	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	Groundwater levels will not be lowered in the area because water will be imported as there is already a shortage of water. Initial water use for dust suppression will be from the local area but the amount of water proposed to be used is very little and will not have a significant impact.  60 boreholes are sampled on a quarterly basis for chemistry and monthly for levels. The trend is looking good for the 2 years of monitoring data collected. The shaft will be grouted to stop water flowing into the mine. Water from 60m below surface is about 0.1L/s thus very little water will flow into the mine, it will just be enough for dust suppression.  Monthly surface and groundwater monitoring

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				reports are available and can be requested from Platreef.
How will the water table be affected by the mining activities?	Mr Ken Goelst Keus Trust	20/11/2013	Mokopane Town Public Meeting	The mine shaft will be sealed off from underground water so the mining activities should have no impact on underground water.
How will groundwater quality be affected by the mining activities?	Mr Ken Goelst Keus Trust	20/11/2013	Mokopane Town Public Meeting	As above there should be no impact on ground water.
<p><b>GEOLOGY AND HYDROLOGY</b></p> <p>We refer to Andy Gubb's Report (Attached hereto):CER/WESSA Promoting Participation Programme NYLSVLEY WATER CONSERVATION PROJECT WORKSHOP PRESENTATION by Andy Gubb and Junaid Francis Centre for Environmental Rights Cape Town, February 2012 Page 15 &amp; 16 give detail of the interconnectedness of the water in the area, and how it will seriously and adversely impact on the water resources of the entire water system.</p> <p>The Chamber therefore insists that this be extensively investigated.</p>	Mokopane Chamber of Business	19/11/2013	Email and Letter	<p>Golder Associates have done extensive exploratory drilling and groundwater studies to characterize the hydrogeology of the prospecting area on the farms Turfspruit 241 KR, Rietfontein 2 KS and Macalacaskop 243 KR. This information provides a detailed conceptual understanding of the hydrogeological conditions of the prospecting area from which a representative hydrogeological conceptual model can be drawn.</p> <p>The mine construction works and specifically the vertical shafts will be curtain grouted to approximately 60m below ground level to prevent any leakages/losses from the shallow intergranular and fractured aquifer system into the shafts. This is the aquifer system used by the surrounding communities for water supply. It is also not planned to abstract any water from this shallow aquifer system for the purpose of</p>

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				<p>prospecting, future mining and related uses.</p> <p>With respect to Figures 4 and 5 of the Nylsvley Water Conservation Project report by Gubb and Francis, the area where the Platreef mine will be developed is shown as part of an extensive primary (alluvial deposits) aquifer which is between 12 and 35m thick. However, the drilling of over 50 shallow (&lt;15m) and deep (up to 200m) boreholes confirms that this is not the case for the Platreef mine area on the farms Turfspruit and Macalacaskop. Soil/regolith was intercepted in most of the exploratory boreholes, but the thickness was &lt;4m and with a water table of average &gt;6m in the area, this zone is permanently unsaturated. The farms are therefore not underlain by an alluvial aquifer system, apart from within the current flood plain area of the Mogalakwena drainage channel, as mapped by the Department of Water Affairs. According to DWA its thickest development is some 4.5km to the southwest of the proposed mine infrastructure development area.</p>
<p>What will happen to boreholes which are drilled deeper than 60m if the protection of ground water in the shaft is provided for between 25 -60m of the shaft area?</p>	<p>Mr Maluleke Tshamahansi</p>	<p>17/11/2013</p>	<p>Tshamahansi Public Meeting</p>	<p>The water table in the area is between 20 -50 m deep therefore boreholes drilled deeper than 60m should not be affected.</p>
<p>Please make the groundwater report compiled by Golder Associates available to the community.</p>	<p>Mr J Manamela Mzombane</p>	<p>15/11/2013</p>	<p>Stakeholders Forum Meeting</p>	<p>The groundwater report is available at the CSR and at the DMR offices.</p>



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What will happen to my underground water supply?	Mr Leslie Coetzee Farm Portion 94 Rietvally 340	30/08/2013	Email and registration form	There should be no impact on your underwater supply. If there are impacts and these can be proven to be related to the mine, a process of remediation would be entered into which could include the mine providing an alternative water source.
Platreef is currently drilling and some people in the area are not able to use the water which is already polluted with chemicals from the drilling activities. How is the water going to be managed whilst the communities are already impacted upon? Why did Platreef not conduct the groundwater assessments prior to conducting the ESIA studies which Digby Wells is undertaking?	Mr Lukas Nkuna	12/07/2013	Stakeholders Forum Meeting	The family which was impacted have been supplied with an alternative water source. Golder Associates has been involved with groundwater studies during the prospecting phase to date. In 2010-2011, water monitoring commenced. This included taking water quantity measurements and chemical analyses of the boreholes and approximately 44 samples were taken (not all boreholes were sampled). Other boreholes were drilled for monitoring purposes. The objective of the studies was to obtain baseline data. Thereafter borehole drilling continued in 2011-2012 during this period the monitoring of boreholes continued. If there are any changes to the water quality, the affected communities will be informed. There is a lot of information available from the water studies. This data will be made available for public review as part of the ESIA process. The consultants are there to conduct independent studies and to provide information to the public, authorities and the communities.
How will they seal off the water in the mine shafts? How is it	Mr E. Honiball	12/07/2013	Stakehold	A 20m by 20m shaft will have to be dug and

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done on other mines?	Attorney and Community Legal representative and representing Lawyers for Human Rights		ers Forum Meeting	concreted off from surrounding rock. It will be sealed in order to avoid seepage into the shaft from the surrounding rock. This practice is generally used in the mining industry.
Some community members have their private boreholes; will they still have water available in the boreholes during mining?	Mr John Baloyi Hlongwane	07/07/2013	Public Meeting Tshamahansi	A detailed groundwater impact assessment forms part of the EIA and obtained the needed baseline information for groundwater in the area. The potential impact on affected boreholes was determined as part of this study.
<b>27 WATER QUALITY &amp; QUANTITY</b>				
Please inspect the water being consumed by the people to ensure that it is not contaminated.	Mr Lesiba Lamola Kgubudi Community Forum	28/11/2013	Focus Group Meeting	Comment noted, there is a monitoring programme in place which monitors water quality.
H2O contaminated at HNO 156 Motimedi Str Ga-Kgobud, is not well addressed or compensated.	Mr Sello Jonas Kekana SANCO Mosestjane	04/12/2013	Fax	This family has been provided with an alternative water source, however the water quality at this specific borehole has been found to be similar or the same as the general water quality in the area.
Please send details regarding zero discharge of water.	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	This information is contained the EIA Reports.
The legislation makes provision for a Water Catchment Agency, the agency should be established by Platreef because	Mr Honiball E.G Honiball	20/11/2013	Mokopane Town	A Water Catchment Agency has not yet been established by the Minister, however, Platreef as

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communities are concerned about the cumulative impacts in the environment and all mines say there will be no major impacts but there are impacts. What guarantee does Platreef have that there will be no impacts because specialists cannot predict everything?	Attorneys Representing Ga-Kgubudi, LHR and in his personal capacity		Public Meeting	a member of the Joint Water Forum (JWF) is awaiting the Minister's decision on the WCA for the Olifants River Water Resource Development Scheme. .
We insist that the applicant fund a peer review appointed by I&AP's at the cost of the mining company, as well as an independent company to monitor the effects of mining on the water resources, both surface and underground water. The community would like to appoint such specialists so as to avoid conflict of interest. This monitoring should be continuous and regular reporting should be shared with the community. This should include at least discrepancies in the predicted versus actual usage. This should include boreholes of all water users dependent on the source.	Mokopane Business Chamber	19/11/2013	Email and Letter	A formal hydrological baseline survey complying with DWA requirements has been completed. This forms part of the EIA and the IWULA application. A monitoring network has been established on both the drainages and monitoring boreholes in the Platreef area and routine monthly flow and quality monitoring is undertaken. All DWA regulations/standards and guidelines will be met and monitored by the Applicant. Golder has been appointed by the Applicant as an independent consultant to undertake the specialist surface and groundwater studies
The Mokopane area is a water scarce area with a growing number of mines. We are aware of how much water is used in a mining operation, and would not like a repeat of the current situation as is found in Rustenburg, Carolina and Witbank. We would like a guarantee from the applicant that should there be water shortages any time in the future, the mine will agree to stop its water use completely in favour of human and animal and ecological consumption requirements.	Mokopane Business Chamber	19/11/2013	Email and Letter	The mine will not be using the same water resource as the town.
We would also like there to be an investigation of the extent to which the Mogalakwena acts as a source of water to water users	Mokopane Business	19/11/2013	Email and Letter	There is no intention to abstract water from the Mogalakwena river for use by the mine.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
in the area.	Chamber			
We are commercial farmers with one of the few water rich farms in the area. We are very worried about losing water quantity and quality (Hydrology assessment)	Mr Kenneth Goelst 65 Uitloop Percy Fyfe Road Mokopane	02/11/2013	Email and registration form	The farm is situated a distance from the proposed mining area and there should be no impacts on water quality or quantity.
My husband and I live on a farm 5 km from Mokopane, on the Percy Fyfe Road (Plots 47 & 65) where we farm intensively with Breeder Chickens under contract to Mike's Chicken. We have an abundance of water and are very worried that the blasting from the mine and other mine related activities may influence our water quality and quantity. We are one of the few farms in the area with an abundance of water and will be devastated to lose it, as this farm is our livelihood and only source of income.	Wena Goelst 65 Uitloop Percy Fyfe Road Mokopane	16/09/2013	Email	A detailed baseline survey is being conducted to test the quality and quantity of water, samples will be drawn from various locations to test the water. Continuous monitoring will then be undertaken throughout the life of the mine and an EMP will be developed. The EMP has details regarding the monitoring programs and mitigation measures to address water pollution.
Daar is reeds 'n tekort aan water en die projek gaan dit net verhoog.  There is already a shortage of water and the project is going to increase this shortage.	Renita Prinsloo Potgietersrus Distrikslandbou Unie	30/08/2013	Email	The project will source water from sustainable resources. A water use licence will also be applied for which will consider all the water uses in the catchment.
What happens if water is contaminated after mining?	Mr Leslie Coetzee Farm Portion 94 Rietvally 340.	30/08/2013	Email and registration form	The EMP has mitigation measures to prevent water contamination. In the event that contamination takes place this will be managed as part of emergency measures which the mine by law will need to have in place. The mine will also have a closure plan in place to manage water pollution post mine closure.

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Water pollution is also a concern as the community is dependent on groundwater supply which is also at risk of being contaminated.	Mr Thako Leseke Mahwelereng Youth Council	11/08/2013	Mining Right Applicatio n Public Meeting	A detailed baseline survey is being conducted to test the quality and quantity of water, samples will be drawn from various locations to test the water. Continuous monitoring will then be undertaken throughout the life of the mine and an EMP was developed. The EMP has details regarding the monitoring programs and mitigation measures to address water pollution.
The impact on water quality in the area is a concern.	Mr Jan Mokoena Masodi	07/07/2013	Public Meeting Magongoa	There will be continuous monitoring of water quality throughout the life of the mine. Changes to water quality will be assessed by a specialist and information will be made available to the communities.
During the meeting with Mr Motswaledi, it was indicated that there was a business report to compensate the family at stand number 156 which was affected by water quality issues. To date, the community has not received any feedback regarding this report.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	The ground water is constantly monitored the affected family has been supplied with an alternative water supply.
<b>28 SOIL</b>				
Appendix H- Soil Sixty percent of the population in all these areas depends on soil for a living. They are not fully flashed farmers yet they still regard themselves as one. Since Platreef Resource is due to occupy number of hectors of land, alternative land should be discussed for grazing and future expansion. Number of people living there shall not remain the same. Five years down the line they would want to grow/expand as nature dictates. That does not mean Platreef Resource has to bankrupt itself in doing that. That	Mr Jacob Molomo	06/11/2013	Email and Letter	Two land use options are mentioned namely grazing animals and future expansion of housing areas. It is true that grazing takes up land and that the mined areas will be fenced off preventing animals to graze within the mined areas, thereby decreasing the available areas for grazing animals. An assessment of the present numbers of animals and gazing capacity of the area is to be undertaken and an estimation of the size of

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<p>challenge has to be discussed. What seems not been necessary might be necessary to some.</p>				<p>the offset grazing area will be determined. This type of assessment is outside the scope of the soil report at present. An economic displacement plan will be developed to address the issue of the loss of crop and grazing land.</p>
<p><b>29 POLLUTION</b></p>				
<p>We insist that the company commit to funding an independent pollution watch grouping that is chosen by the Mogalakwena community and which reports regularly directly to them on the different pollutants that this mine and any other related activities will produce. The watch should report at least quarterly to the community on their findings. The watch should monitor at least the following: air pollution, noise pollution, water pollution – both underground and surface, light pollution. This is not an exhaustive list. The tests should be done by a credible independent body, appointed by the community.</p>	<p>Mokopane Business Chamber</p>	<p>19/11/2013</p>	<p>Email and Letter</p>	<p>The mine as per its EMP will monitor all its pollution sources and will comply with the auditing of its EMP. The EMP makes provision for the development and implementation of various environmental monitoring plans to monitor and manage environmental impacts.</p>
<p>We as the community also insist that the applicant commit to funding an ongoing independent environmental watch. We propose that such monitoring be done by an environmental NGO such as WWF Source to Sea team which reports to the community on an ongoing quarterly basis as to the health of the environment at large. The report should be followed by action that will need to be taken by the mine, should the environment be compromised by their mining and any other related activities. The environmental watch team's funding should include investigation and reporting on some of the following: avian health upstream and downstream of the site; aquatic health, biodiversity, general wetland health, vegetation health, aquifer</p>	<p>Mokopane Business Chamber</p>	<p>19/11/2013</p>	<p>Email and Letter</p>	<p>The mine as per its EMP will monitor all its pollution sources and will comply with the auditing of its EMP. The EMP makes provision for the development and implementation of various environmental monitoring plans to monitor and manage environmental impacts.</p>

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
contamination. This is not an exhaustive list.				
Besoedeling is ook 'n baie groot problem.  <i>Pollution is also a very big problem</i>	Renita Prinsloo Potgietersrus Distrikslandbou Unie	30/08/2013	Email	Pollution control is addressed in the Environmental Management Plan (EMP) for the project.
<b>30 NOISE</b>				
Appendix G-Noise  It will be good to follow what is contained in the report all the time. It really shows that it was compiled by knowledgeable bodies. We all know it will be extremely difficult to manage the noise when phase 1 of the operation begins. There will be impact irrespective of measures put in place to curb that especially to the four nearby villages like Ga-Kgobudi, Ga-Magongoa, Tshamahansi and Mzombana. I like to bring forth possible practical preventative measures for it might be costly to relocate all four villages at once. Unless you agree on terms such as replacement value of the existing structures. We should not forget that either way Platreef Resources will change the lives of many for the better in those areas. As for the other adjacent villages there will be no need to relocate. We are talking of under ground mine. This is not the first of its kind in South Africa. Let's not forget the impact to be made by dust/Air pollution. This can be a temporary measure to avoid noise both from the community and machineries during blasting. Evacuation of those vulnerable is the answer: Blasting is not an ongoing thing. It is done periodically. I am speaking of the four	Mr Jacob Molomo	06/12/2013	Email and Letter	Mitigation measures in terms of maintaining good public relations with the surrounding communities, i.e warning the local communities in advance before blasts, have been included in the noise report.  The blasting noise levels are expected to cause strong community reaction at certain communities, but only when the blasting is at surface level. The blasting noise levels are however not high enough to impact on any community's with regards to health.  It is therefore not necessary to implement an evacuation process, but focus on keeping communication channels open and warning the surrounding communities before blasts take place. It would then give the people enough time to move indoors if needs be, which would be sufficient to minimize the nuisance factor of the noise created by the blasts.

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mentioned villages which are to be affected that particular day. Get an entity/company/someone that can do the job to its best of evacuating senior citizens, children, babies, sick people and school children. It should be someone who can put these frightened people at ease at all cost. He/she shouldn't be from Platreef Resources nor Digby Wells and Associates. It has to be a neutral person or company who did this before. If ever you meet challenges my company Lomzito Reliable Transport is ready to assist with this exercise I have seen it before and I can always do it again. First one needs to train his members from each area to can execute this task accordingly. Unless you have other plans there is no problem. The point safety comes first. This exercise will be carried out until all is fine. Money shouldn't be the object if ever there is a clear vision.				
We would also like to know how the mine will influence our breeder chicken farm with noise & air pollution and security (crime).	Mr Kenneth Goelst 65 Uitloop, Percy Fyfe Road, Mokopane	02/11/2013	Email and Registrati on form	The noise impacts form the mine will be localised and there should not be any impacts felt at the farm due to the distance of the farm from the mining area.
We are also concerned about the noise pollution around the mining activities as well as the transport of the product to the smelter with reference to the newly planned N14 road which will pass our farm in close proximity. The noise and pollution will affect the laying birds and breeders and will have a definite effect on the market value of our property.	Wena Goelst 65 Uitloop Percy Fyfe Road Mokopane	16/09/2013	Email	A noise impact assessment forms part of the EIA undertaken as part of the specialist studies. The specialist studies show that noise pollution will be localised around the mine.
<b>31 BLASTING</b>				
Blasting is a concern because the community can feel and hear the blasting from the Anglo mine. Please provide the results of	Mr Lekau Kekana Kugbudi	20/11/2013	Mokopane Town	Platreef is building infrastructure on top of the area where blasting will take place, that should



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the blasting surveys because the community needs to know the impacts of the blasting long term.	KC, FMIACDF		Public Meeting	demonstrate that there are no negative impacts expected, a structural survey will also be done to protect the structures but should there be any damages, there will be compensation.
How will the community be affected by blasting activities?	Mr Ken Goelst Keus Trust	20/11/2013	Mokopane Town Public Meeting	The proposed Platreef mine will be an underground mine at a depth of 800 – 1 000m. Blasting could have an impact during the sinking of the shaft up to a depth of 150m. After that, blasting will not be felt or have an impact on the surface infrastructure.
When they start working our house will crack so then who is responsible for that damage.	Mr Lo	19/11/2013	Email	A blast survey will be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases. If there are damages to houses during blasting and it can be proven that this is a result of Platreef's activities, the appropriate remediation will be undertaken.
How will blasting affect the houses in the community?	Mr Joshua Mojela Mosesetjane Ga-Sekgoboko Development	15/11/2013	Stakeholder Forum Meeting	Platreef will be conducting a housing structure survey to assess the current state of houses in the community.  A blast survey will also be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases. If there are damages to houses during blasting and it can be proven that this is a result of Platreef's activities, the appropriate remediation will be undertaken.
They must consider the facts that during the explosive, buildings	Edith Ngobeni	02/09/2013	Email and	Platreef will be conducting a housing structure

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can cracks or collapse and cause lots of accident and incidents.	(Chairperson) M.J Langa (Secretary) Mogalakwena Faith and Hope Foundation		letter	survey to assess the current state of houses in the community.  A blast survey will also be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases. If there are damages to houses during blasting and it can be proven that this is a result of Platreef's activities, the appropriate remediation will be undertaken.
Will grave sites be affected by blasting activities?	Mr khazamula Ngoveni Maceke	07/07/2013	Public Meeting Tshamahansi	A blasting impact assessment has been conducted and the final results for this study are incorporated in the final Environmental Impact Assessment / Environmental Management Plan (EIA/EMP). The EMP highlights how blasting should be undertaken considering the potential impacts on graves.  A blast survey will be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases of the mine.
Will blasting activities affect nearby houses?	Mr Peter Nkuna	07/07/2013	Public Meeting Tshamahansi	A blast survey will be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases.
No mention around blasting was made in the presentation. There is no mine that can proceed without blasting and there is no indication as to how the blasting will affect the communities. For example, we can hear blasting from the Anglo mine which is	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	A baseline housing structural survey will be undertaken prior to the commencement of mining activities. Blasting will be undertaken according to legal requirements and will be undertaken by

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approximately 7 km away. The documents must indicate how the blasting will be managed and how the community can develop a community forum to report such issues.				professionals.
People are concerned about the safety of houses. There are houses in the area and owners must be informed as to what will happen to them.	Mr Machau Mzombane	07/07/2013	Public Meeting Magongoa	Before the shaft sinking starts people will be informed of the potential blasting impacts. Blasting activities will be in accordance with relevant legislation/standards and undertaken by professionals.  A blast survey will be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases.
<b>32 TRAFFIC</b>				
Children from Mzombane walk to school in Tshamahansi and cross the N11 which is very dangerous. The safety of the children is a concern.	Ms Docky Mashitisho Mzombane	28/11/2013	Focus Group Meeting	A recommendation to SANRAL can be made to include walkways as part of the N11 upgrade. The recommendations will be made at a director level.
It was mentioned that additional road signs will be placed to mitigate the expected increase in traffic, the various mining houses should work together to upgrade the route since the N11 is already a very dangerous road.	Mr Madimetja Pale Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	Platreef is engaging with SANRAL. SANRAL plans to upgrade the N11 and Platreef will be building new turn offs to the project site. These upgrades will also service the communities. Platreef is also looking at the possible upgrade of the Turfspruit road. If these plans are successful then most of the traffic related to the proposed mine will be directed along the Turfspruit route. Platreef acknowledges that the N11 is a dangerous route.

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Platreef should consult with government for road extension before mining starts as there are already too many accidents on the road.	Mr Percy Motileng MCO Chairperson	20/11/2013	Mokopane Town Public Meeting	Engagements with SANRAL (N11) are taking place to ensure that there are safe and proper off ramps for the mine. Platreef is investigating the upgrade the Turfspruit road to reduce traffic through the communities.
The roads are already congested and now Platreef wants to add more vehicles, this will increase the amount of accidents which is a major concern	Ms Mokgatla Mzombane	20/11/2013	Mokopane Town Public Meeting	Traffic control measures will be implemented and it is being investigated if alternative routes can be used.
They must assist the government in developing enough roads, to prevent accidents on the roads, when their vehicles are busy moving in and out of the area of operations	Edith Ngobeni (Chairperson) M.J Langa (Secretary) Mogalakwena Faith and Hope Foundation	02/09/2013	Email and letter	A Traffic Impact Assessment forms part of the EIA. The conclusion of the report was that the proposed mine would cause an increase in traffic, however the existing road network can accommodate this.  Platreef is investigating alternative routes to access the project area, as well as the feasibility of upgrading local roads
The N11 is already congested.	Mr Victor Ruri Development Forum	11/08/2013	Mining Right Application Public Meeting	A Traffic Impact Assessment forms part of the EIA phase. The conclusion of the report was that the proposed mine would cause an increase in traffic, however the existing road network can accommodate this.
What road safety measures are to be put in place?	Mrs Rikhotso Hlogwani	07/07/2013	Public Meeting Tshamahansi	A Traffic Impact Assessment forms part of the EIA phase and the necessary mitigation measures to ensure road safety will be developed and implemented.

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<b>33 SOCIAL IMPACTS</b>				
<p>Appendix K- Social</p> <p>Life in all these areas is awkward. Some still ride on bicycle to work traveling a distance of 8 to 12 kilometres. The same distance is travelled back home whilst some use donkeys for the same purpose. Life style here needs to be re-looked by both investors and Mogalakwena municipality collectively. Development such as clinics and complexes/malls and proper schools could play a major role. We all know that Rome was not built in one day. In Afrikaans they say “Bitjie bitjie maak meer”. Slowly but slowly we shall end up living a good life style. Who knows? Platreef Resources might be a Godsend.</p>	Mr Jacob Molomo	06/12/2013	Email and Fax	The mine intends to contribute to socio-economic development via several Local Economic Developments (LED) initiatives, which are outlined in Platreef’s Social and Labour Plan. These LED initiatives are aligned with the Mogalakwena Local Municipal Integrated Development Plan (MLM IDP), which is a statutory document indicating the development needs in the local area.
What does the mining charter say about affected communities?	Mr Percy Nketsi Mogalakwena	28/11/2013	Focus Group Meeting	According to the SLP and the mining charter affected communities must receive preferential treatment.
The Chamber expects that the applicant takes into consideration reports such as the Bench Marks Community Report of Rustenberg of 2011	Mokopane Business Chamber	19/11/2013	Email and Letter	The 2011 Community Report has been reviewed. The report does an excellent job at summarising the impacts and concerns experienced by communities living in the vicinity of mining activities. These concerns are also reflected in the SIA report, and mitigation measures are recommended for addressing these.
We request that the applicant explain in detail what its proposed plan and methodology with regards to social planning is. This should include but not be limited to details related to community	Mokopane Business Chamber	19/11/2013	Email and Letter	This planning is described in detail in the mine’s SLP, and is summarised in the SIA (in Chapter 3).

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training and development, community social responsibility, proposed local spend, local employment, housing and other related social issues and responsibilities.				
The social plan should clearly indicate how the local community will benefit from its existence. This commitment is outside of the legislative requirements as per the scorecard and BBBEE requirements. This plan should include all community members and inhabitants of the community, Mokopane town and the directly affected villages.	Mokopane Business Chamber	19/11/2013	Email and Letter	This planning is described in detail in the mine's SLP, and is summarised in the SIA (in Chapter 3).
We request that the socio-economic effect of the presence of the mining activity currently, and with future developments planned be thoroughly investigated. This should also include the relocation/ displacement of people, the conditions under which the people will be living	Mokopane Business Chamber	19/11/2013	Email and Letter	As is stated in the SIA, Platreef has stated the intention not to relocate any households. Economic displacement (e.g. through the loss of fields) is addressed in detail in the SIA.
We would also like to see an investigation of the current and proposed transport systems and changes as well as cost implications and effects on ordinary people and businesses in the area.	Mokopane Business Chamber	19/11/2013	Email and Letter	A specialist traffic impact assessment was conducted as part of the EIA, and its findings (insofar as these are relevant from a social perspective) have been incorporated into the SIA report.
Has household baseline survey been done for all households?	Mr Thabo Morwaswi Mzombane	15/11/2013	Stakeholders Forum Meeting	Basic research does not require samples from every household in the communities. A representative sample is taken from a few homes in each community to represent that specific community.
Will our farm be close to a village; living area or mine dumping area which might in future influence our market value?	Mr Kenneth Goelst 65 Uitloop, Percy Fyfe Road,	02/11/2013	Email and Registrati on form	The farm is situated far from the mining area there will be no mining village as part of the development the impacts felt by the farm will be limited and should not impact on the market

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	Mokopane			value of the farm.
Since the mine has been present in the area, family structures have been broken up. This is not right.	Mr Emile Honiball Community Legal Representative	07/07/2013	Public Meeting Magongoa	A SIA form part of the EIA Phase and the findings included in the EIA report.
<b>34 HEALTH AND SAFETY</b>				
Appendix L- Health This aspect is well covered in the report. What needs to happen is to stick to EIA report in terms of implantation improving the lives of these disadvantaged communities. Use it as a guide no matter how long Platreef Resources happen to be there.	Mr Jacob Molomo	06/12/2013	Email and letter	Thank you for the comment
It was mentioned in the presentation that the community will be educated on health issues as there will be an influx of people thus making the spread of diseases easy, is education alone enough to prevent the spread of diseases?	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional Council Meeting	There will be an influx of people when mining operations commence, some will not even be working on the mine but will move in with the hope of getting employment, this may also result in increased crime rates. Platreef has approached the Department of Health to build more clinics as well as the South African Police Services (SAPS) for crime prevention plans.
On the issue of safety, Platreef should assist existing Community Policing Forums.	Mr M.M Lekalakala Masodi	14/11/2013	Mokopane Traditional Council Meeting	Platreef notes the comment.
Will this project cause any health damage?	Mr Lesetja Rakopela	11/08/2013	Mining Right	The Health Assessment looks at the state of the community as far as health is concerned and

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			Application Public Meeting	makes recommendations for how to mitigate health impacts.
I would like clarity on the identification of impacts of the ESIA process with specific reference to the social studies. How will the community be informed of the results of the socio economic studies?	Mr Lukas Nkuna	12/07/2013	Stakeholders Forum Meeting	Platreef and the Government will be informed of the study outcomes from the ESIA assessments completed by qualified specialists. A Community meeting will be held in November 2013 to present the results to communities who will also have the opportunity to comment on the ESIA reports that will be made available for public review.
What impact will the mine have on the community in terms of health and safety?	Mr Lekia	07/07/2013	Public Meeting Magongoa	A health impact assessment forms part of the EIA phase. Feedback will be provided to the communities in respect to the potential health and safety impacts.
<b>35 LEADERSHIP</b>				
The leaders of the mine need to be taught responsibility as they are not responsible.	Mr Emile Honiball Community Legal Representative	07/07/2013	Public Meeting Magongoa	The comment is noted.
If there are no good leaders, there will be confusion. Before Platreef has even commenced with their mining operation, there has already been confusion.	Mr Emile Honiball Community Legal Representative	07/07/2013	Public Meeting Magongoa	The comment is noted.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<b>36 REHABILITATION</b>				
During the shut down, they must ensure that their shaft will not be harmful to the community, because usually after the shut down of the mine, miners do not close their shaft and this can be detrimental to the community	Edith Ngobeni (Chairperson) M.J Langa (Secretary) Mogalakwena Faith and Hope Foundation	02/09/2013	Email and letter	The mining area will be rehabilitated after mining and this will include the closure of the mine shaft.
What will the rehabilitation process be after 30 years?	Mr Lesetja Rakopela	11/08/2013	Mining Right Applicatio n Public Meeting	In modern mining, rehabilitation takes place from the day the mine starts operating and is a legislative requirement and will continue throughout the mine's lifecycle. Platreef has to make provision for a rehabilitation fund now. An estimation of the amount of money required is done through a closure cost assessment.
What will happen to the holes in the ground once mining has been completed? Are there any plans for rehabilitation?	Mr Lawrence Manama Sekgakgapeng - African National Congress (ANC)	07/07/2013	Public Meeting Magongoa	Platreef is responsible for the rehabilitation of the land. As the mine progresses, the areas affected will be rehabilitated. This is a legislative requirement in terms of the MPRDA. In this regard, the DMR has established a fund where money is deposited for rehabilitation.
<b>37 BROAD BASED BLACK ECONOMIC EMPOWERMENT</b>				
The B-BBEE should be amended to cover the 50km radius.	Mr Lesiba Kgonyane Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	The Mining Charter and SLP do not stipulate a specific kilometre range in which communities should benefit from B-BBEE.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Who is the BEE partner?	Ms Hilary Knight Mokopane Chamber of Business	20/11/2013	Mokopane Town Public Meeting	Platreef is planning to put in place a Broad-Based Black Economic Empowerment structure. Platreef will present the new structure for consultation with all the communities in due course.
Platreef did not Plan this BEE deal very well. What is happening there?	Mr Mpho Baloi Tshamahansi	17/11/2013	Tshamahansi Public Meeting Discussion with Werner Botha (Barnstone)	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.  Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
Are the white owned companies that have been contracted by Platreef also part of the triple BEE?	Mr Frans Mphela SANCO	15/11/2013	Stakeholders Forum Meeting	No, the BBBEE is intended to benefit all the HDSA communities of Mokopane, as well as the company's employees and women and children.
The triple BEE will only benefit politicians not the community, the affected communities should not allow Platreef to access their land because they will not gain anything from the mining operations. Platreef must give a break -down of how the 26% in the triple BEE will be distributed. There must be tangible benefit	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional Council Meeting	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.  Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
The empowerment being spoken of should be practised because presently it is just on paper, Platreef is failing to	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional	Platreef has been considering all of the feedback obtained during the BBBEE consultations, and

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implement.			Council Meeting	will present the new structures for consultation with all the communities.  According to the law, the implementation of the BBBEE will be effected once the Mining Right has been issued.
If the Broad Based Black Economic Empowerment (BBBEE) issue is not addressed, a small number of people will benefit a great deal while many gain absolutely nothing.	Mr Victor Ruri Development Forum	11/08/2013	Mining Right Application Public Meeting	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.  Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
Upon commencement of the meeting, it was announced that there would be a presentation on BBBEE, but that has not happened.	Mr Kekana Masodi	11/08/2013	Mining Right Application Public Meeting	Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.  BBBEE is a separate aspect and there have been consultation meetings taking place relating to BBBEE matters. This meeting is to discuss the ESIA process as part of the Mining Right Application for the proposed project.
Yesterday at the BBBEE meetings, we heard that there were 3 representatives from companies to present on the BBBEE deal and that there were resolutions taken and that there must be 2 companies that are being formed. It was said that the community agreed	Mr Lekau Kekana KCF & MIACDF	12/07/2012	Stakeholders Forum Meeting	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
The BBBEE module is not wanted by the community but the leaders said they want it. Then one company will come and address the people instead of the three which was promised. We want things to be done in a correct way.	Mr Lekau Kekana KCF & MIACDF	12/07/2012	Stakeholders Forum Meeting	Three professional service providers were invited to present and two arrived for the presentation and only one was allowed to give a presentation because the meeting was disrupted.
Why has anyone not mentioned the 1 million rand which was mentioned at the previous BBBEE meetings?	Mrs Saniky Nyaluka Tshamahansi / Maceke Village	7/07/2013	Public Meeting Tshamahansi	Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.  Annual payments will still be made to the beneficiaries of the BBBEE structures, as determined by the mandate to be followed by the trustees.
There were other people who were not allowed to participate in the BBBEE workshops. Other people have not been provided with the opportunity to get the detailed explanation of how they will benefit from the operations. This is not clearly explained in the presentation. The community has not accepted the BBBEE structure from Platreef. The community has been made aware that the Memorandum of Understanding (MOA) for the BBBEE structure has been finalised. The MOA has not been addressed at the Kgoros. Platreef is misusing the traditional structures.	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.  Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
<b>38 EMPLOYMENT / CONTRACTORS</b>				
Will there be jobs for those who furthered their studies after Grade 12?	Mr Seli Maleka	01/12/2013	Mmadikan	There will be jobs for those who furthered their

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Ga -Madiba		a Sport Ground Public Meeting	studies after Grade 12.
Will Platreef employ people who do not have Grade 12 certificates and can you specify what the additional jobs mentioned in the presentation are?	Mr Oseng Kopole Masehlaneng Development Committee	01/12/2013	Mmadikan a Sport Ground Public Meeting	The mine will be highly mechanised, therefore it is necessary to set the minimum employment requirement of Grade 12, however, subcontractors will not be bound by this minimum requirement. There will also be projects on enterprise and skills development programmes which will be established where people who are not in possession of a Grade 12 certificates will have opportunities for upliftment as well as business opportunities.
As the panel upfront consists of white people, it will not be any different when Platreef recruits for employment, white people will get the jobs because Platreef has Japanese shareholders to please.	Mr Tshepo Maponya Sekgakgapeng	01/12/2013	Mmadikan a Sport Ground Public Meeting	This is not true Platreef has an open employment process which favours historically disadvantaged individuals.
Platreef should also employ the disabled so that they are empowered as well.	Mr William Matlu Mahwelereng	01/12/2013	Mmadikan a Sport Ground Public Meeting	As per the employment equity legislation Platreef employment practices are not discriminatory.
Who will be hiring the 2500 people? The people do not know where to obtain information for employment.	Mr Robert Mogatle MIACC	28/11/2013	Focus Group Meeting	Platreef will employ its own skilled workforce. There will also be a number of contractors who will be hiring people. People will be informed of the recruitment process.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<p>All people from the affected villages should get an opportunity to work. How does the Mining Charter and the law define Affected Parties?</p>	<p>Mr Madimetja Pale Mogalakwena Community Forum</p>	<p>28/11/2013</p>	<p>Focus Group Meeting</p>	<p>All the people of Mogalakwena Municipality will be provided equal opportunity for employment provided the minimum skills requirements are met.</p>
<p>Some young people in the community have degrees in geology and mine engineering. Will Platreef employ these people and give them opportunity to obtain experience? Some of the people have already applied for jobs and have not heard anything. What is the recruitment process?</p>	<p>Mr Philemon Lamola Mahwelereng Rate Payer Association</p>	<p>20/11/2013</p>	<p>Mokopane Town Public Meeting</p>	<p>Platreef invited people to apply for bursaries to further their studies. Platreef has also invited people with qualifications to register. The HR recruitment process is also structured and open advertisements are placed widely around the area, Platreef employs people on merit.</p> <p>Once the bulk sample wall is constructed Aveng (The main contractor) will move in to start with the construction of the shaft. 250 jobs will then become available immediately. Group geologists are from Ga-Kgobudi, Platreef will only outsource skills that are not available in the affected communities but it is also important to note that quality is important for the safety of the people and for various other reasons, thus it is important to get experienced people.</p> <p>Mining engineering and other engineering will be required once the mine is operational. Platreef will only recruit people from outside if the skills cannot be found in the local area. Some skills required to construct a mine are highly specialised and one cannot compromise on quality when building a mine because it will put the health and safety of people at risk.</p>

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
Nepotism must not take place when the mine starts employing people.	Mr Madimetja Daniel Mokgotho Ward 24 Leader	20/11/2013	Mokopane Town Public Meeting	The Platreef employment process is free and fair and follows the required legislative process.
Will we have jobs as some of the community don't have any qualifications.	Mr	19/11/2013	Email	The local communities will have preference when it comes to employment. The minimum qualification to work on the mine is grade 12 this is because the mine will be highly mechanised and will require a skilled labour force.
During the presentation it was mentioned that during the construction phase people will be employed, where should people go to get employed?	Ms Winnie Baloyi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	The information will be available at the community liaison offices and people will be informed.
Does Platreef only employ people with mathematics? What will happen to those who do not have mathematics?	Mr Jerry Chabalala	17/11/2013	Tshamahansi Public Meeting	Maths and Science are subjects which are required by most jobs and not only in mining. Platreef will have jobs which require maths and some which will not require maths, people will be hired according to meeting the minimum requirements of each specific job.
When exactly will the 2500 jobs during construction become available. You must notify me when they are available so we can apply.	Mr Mpho Baloi Tshamahansi	17/11/2013	Tshamahansi Public Meeting Discussion with Werner Botha (Barnstone)	Platreef wants to start with the construction of the bulk sample shaft as soon as possible and it may commence early in 2014. The exact date is not known yet, because it is subject to approval from the DMR. Platreef will advertise the jobs that become available by Platreef and its contractors.
It was stated that the affected communities will be employed yet jobs are given to white people, There are small companies	Chief Kekana Mokopane	14/11/2013	Mokopane Traditional	Platreef is committed to employing locally as well as employing from BEE accredited companies.

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within the affected communities that can be contracted but contracts are given to more established companies outside the affected communities like companies from Polokwane.	Traditional Council		Council Meeting	
The Traditional Authority should be involved in deciding which companies will be contracted. Local businesses should get first preference and if there are resources that local businesses do not have only then can Platreef source from outside the affected communities.	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional Council Meeting	The awarding of contracts needs to be an open and transparent process and the TA cannot be involved in this process. Platreef is committed to contracting local companies.
Jobs should be given to local people, if the people are unemployable then Platreef should empower them through Self - help programs and co-operatives.	Mr M.M Lekalakala Masodi	14/11/2013	Mokopane Traditional Council Meeting	This is what Platreef plans to do through the social and labour plan's Local Economic Development and Enterprise Development initiatives, once the Mining Right has been issued.
Platreef has been consulting with communities since the year 2000 but there is no plan for empowering people with disabilities. The employment Equity Act stating that 2% of disabled people should be employed is not taken into consideration. Disabled people should be empowered economically.	Mr Malose Macks Molomo Kgobudi Traditional Authority	14/11/2013	Mokopane Traditional Council Meeting	As per the employment equity legislation Platreef employment practices are not discriminatory.
How will Platreef get hold of the 2500 people that will be employed during construction?	Mr Malose Macks Molomo Kgobudi Traditional Authority	14/11/2013	Mokopane Traditional Council Meeting	Platreef has obtained a list from the Department of Labour of the skilled and unskilled people in the communities; this list will be used to contact candidates. Platreef will be in the construction phase from 2014 - 2018, two construction companies from the area have been contracted. There will also be a training centre where training for welding, plumbing etc. will be provided. Bursaries have been given to young people in the engineering field.



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Platreef stated that 250 people will be hired to work on the shaft, have these people started working yet.	Ms Maureen Morwaswi Mzombane	14/11/2013	Mokopane Traditional Council Meeting	During the construction of the bulk sample shaft, Platreef's contractor AVENG will employ 250 people, a 170 of whom will be from the local communities.
Will there be any employment for people who do not have Grade 12 certificates?	Mr Salome Mokonyane Sekgoboko	14/11/2013	Mokopane Traditional Council Meeting	There are other CSR projects run by Platreef where people with no Matric certificates will be employed.
How many high level positions will be available for the affected communities? Can Platreef give a percentage of how many people will be employed from each community?	Ms Josephine Madiba Kgoro Ga-Madiba	14/11/2013	Mokopane Traditional Council Meeting	Numbers cannot be given at this stage because the Human Resources (HR) department is not present, but the Social and Labour Plan indicates the levels of employment as well as the employment equity targets. At this stage it cannot be said how many people will be employed from each community.
The communities should be included in the Procurement Plan.	Mr M.M Lekalakala Masodi	14/11/2013	Mokopane Traditional Council Meeting	The businesses from the local communities are already included in the Procurement Pan.
However the following should be done to meet the local community's needs: Employment preferably for local youths including me, development of the surrounding infrastructure, and certain company stake of percentages be distributed to the affected communities or an transparent trust be opened to benefit the development of the affected communities, contractors preferably be the local business people including me.	Mr Tshepho Maja	10/11/2013	Email	The Social and Labour plan commits Platreef to employing and procuring locally as far as possible. Platreef will also be establishing trusts as part of the surface lease agreements and the BBBEE arrangements which will come into effect once the mining right is issued.
Don't Platreef need any electrical artisan?	Bashley Felesi	17/09/2013	Email	The mine will need a number of artisans and artisan should apply at the mine.

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I just want this project to be fair when coming to employing people and it should train people so that they can be able to work underground.	Ms Pabalelo Khutso Madisha	26/08/2013	Email and registration form	The SLP deals with issues related to employment. There will be training for people so that they can work underground.
Job opportunities during the construction of the shaft should be for local people. What is Platreef doing to ensure that the locals are employed?	Mr Lesetja Rakopela	11/08/2013	Mining Right Application Public Meeting	The SLP deals with Local Economic Development and Employment. The SLP will only come into effect if the Mining Right is awarded.
Now the mine is discriminating by only wanting to employ people with qualifications.	Mr Robert Mogafe	12/07/2013	Stakeholders Forum Meeting	Some of the positions on the mine require qualifications as these are skilled jobs.
What is Platreef's contingency plan for employment of local youths?	Mr Sarel	07/07/2013	Public Meeting Tshamahansi	Department of Labour, supported by Platreef will come to Tshamahansi to register people, mainly the youth, to provide opportunities for potential training and employment to those who qualify.
Will the mine employ uneducated/ unskilled people?	Mr Simon Maluleke	07/07/2013	Public Meeting Tshamahansi	The mine will be highly mechanised, therefore it is necessary to set the minimum employment requirement of Grade 12, however, subcontractors will not be bound by this minimum requirement. There will also be projects on enterprise and skills development programmes which will be established where people who are not in possession of a Grade 12 certificates will have opportunities for upliftment as well as business opportunities.
Will the mine employ disabled people?	Ms Anicky Ngoveni	07/07/2013	Public Meeting Tshamaha	Platreef does not discriminate and therefore, disabled people will be employed.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Tshamahansi		nsi	
Is Tshamahansi included in the numbers that are going to be employed on the mine?	Mr Oupa Mathye Hlogwane	07/07/2013	Public Meeting Tshamahansi	Yes, the affected villages will be given preference for employment opportunities. All the people of Mogalakwena Municipality will be provided equal opportunity for employment provided the minimum skills requirements are met.
It is estimated that approximately 2000 people will be employed at the mine. It is recommended that local people be trained and capacitated in order to operate the heavy duty machinery and physical manual labour which will be required by the mine. The communities should be trained to use the machines in order to qualify for job opportunities at the mine. This training must be implemented soon, prior to the mine commencing.	Mr Aubrey Langa Masehlaneng	07/07/2013	Public Meeting Magongoa	The issues of skills development and training are addressed in the SLP which will be implemented if the mining right is awarded.
All people from all the affected villages must have an opportunity to work.	Ms Maria Mogongoa Magongoa- Zone 2	07/07/2013	Public Meeting Magongoa	People from the affected villages will be given preference to work on the mine. All the people of Mogalakwena Municipality will be provided equal opportunity for employment provided the minimum skills requirements are met.
The contractors of Platreef advertised a post which indicated that they required matric qualifications. Applicants were requested to bring proof of address from the tribal authority. The closing date was on 27 June 2013. This must not be done. The post must be re-advertised. The mine contractor must require proof of address from the municipality and not from the tribal authority. A lot of people came here because they are looking for employment opportunities. Applications for employment from the mine's side must be managed in a satisfactory manner.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	Anyone is welcome to apply for a job at Platreef there is no favouritism as the employment practices need to be free and fair according to the employment laws of the country. Some of the jobs on the mine will require matric and others will also require higher qualifications.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
The employment criteria used by Platreef is flawed, as they only require individuals from the Kgoro and not residents who fall under the Mogalakwena Municipality.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	Anyone is welcome to apply for a Job at Platreef and each application is treated on its merits.
Work is being provided to white contractors and not black companies.	Mr Dimpho Mathaka Mzombane	07/07/2013	Public Meeting Magongoa	Platreef subscribes to the BBBEE policies of the country and procurement is done from contractors in line with these laws.
Platreef said they will employ local people, but this is not happening. The mine can push for the community to get skills but they might only select a few people for employment.	Mr Dimpho Mathaka Mzombane	07/07/2013	Public Meeting Magongoa	In terms of the SLP Platreef is committed to employing local people. However not everyone will be able to find employment on the mine.
If local people are being employed, then it should be people from Mzombane and other local areas. The mine has been making empty promises	Mr Dimpho Mathaka Mzombane	07/07/2013	Public Meeting Magongoa	In terms of the social and labour plan Platreef is committed to employing local people. However, not everyone will be able to find employment on the mine.
Promises of job creation are merely a bribe by Platreef to obtain a mining licence.	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	The comment is noted. Platreef needs to obtain the mining right before large scale employment can take place.
These are the fields of Magongwa, if the community members are not employed from this area. No Mining will start.	Mr Elvis Molwatse Chairperson of Mokopane Interested and	07/07/2013	Public Meeting Magongoa	In terms of the social and labour plan Platreef is committed to employing local people. However, not everyone will be able to find employment on the mine.

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	Affected Community Committee (MIACC)			
Were communities consulted to assist with the tent? From which company and from which village was the tent hired and the catering was provided from which village? The local people of Magongoashould be doing the catering	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	As far as possible Platreef makes use of local businesses to supply goods and services.
Platreef must take the 2000 people to be employed from the villages and train them in order for them to have the necessary skills to work for the mine. The affected people from the village must have first preference for employment opportunities.	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	The SLP deals with local employment and the training of local people for employment on the mine. The plan also commits Platreef to local employment. The SLP will come into operation if the mining right is granted.
How it is possible that not even one person from the village is sitting at the table? We want these opportunities. We are not dumb. We can also do what everyone else can do.	Ms Maria Magongoa	07/07/2013	Public Meeting Magongoa	The people sitting at the table are all specialists in their fields and have been to university to do the work they are doing. The community is not dumb however some tasks require special training to be able to do the work.

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Local people will not be employed. There must be a Community Labour Desk and officers to take the statistics of skills in the area. The people must be taken to school for training prior to the mine coming into operation.	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	The Department of Labour, supported by Platreef will undertake a Skills and Ability Audit.. Once the Mining Right is issued, Platreef will employ from those who meet the minimum requirements. The SLP makes provision for training of local people.
Why are people from outside working as security guards, if local people are not employed?	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	As far as possible local people are employed. Certain specialised skills might be sourced from elsewhere if not found in the community.
<b>39 PROCUREMENT</b>				
What criteria is used to appoint subcontractors because since these meetings began, Platreef has been using the same catering company?	Ms Mangaleka	01/12/2013	Mmadikana Sport Ground Public Meeting	People were informed in previous meetings about the procurement system in place where companies can submit their documents and be added to the procurement database.
How does Platreef hire their security companies, because there are so many registered security companies in the community which are not getting contracts with Platreef?	Mr Jerry Chabalala	17/11/2013	Tshamahansi Public Meeting	Platreef advises people to think of other business opportunities other than security companies, because not all security companies will be contracted.
How exactly will procurement work during construction when will construction start and what he should I be doing to supply services to the mine.	Mr Mpho Baloi Tshamahansi	17/11/2013	Tshamahansi Public Meeting Discussion with Werner Botha (Barnstone)	To be considered for procurement, one has to have a registered business and prepare a company profile. You can submit your profile to Platreef for consideration. To help with setting up the business, The SLP makes provision for the establishment of Enterprise Development hubs to help people to comply with procurement requirements in future. Mine construction will start within a reasonable period after the Mining Right has been issued. Platreef will publicly

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				announce the start of the construction phase.
The procurement process in mining companies is designed to favour white owned companies and those who already have the money to do the work.	Mr B Lekalakala Masehlaneng	14/11/2013	Mokopane Traditional Council Meeting	This is not true, Platreef's procurement process favours local companies and in particular BEE companies.
How can existing companies in the communities apply to be subcontracted by Platreef?	Mr Somuzi Makhanda Makhanda Trading & Project Pty Ltd	14/11/2013	Mokopane Traditional Council Meeting	They can contact the procurement department at Platreef.
I submitted a business profile to the contractor who promised to look into it. I have not received any response to date. The contractor is renewing their contract every three months but they are not fulfilling their promises of employing local people.	Mr Dimpho Matlhaka Mzombane	07/07/2013	Public Meeting Magongoa	Advise to contact the contractor directly if there is no response.
<b>40 SKILLS DEVELOPMENT AND TRAINING</b>				
The mine should train young people from the affected communities to operate the machinery that will be used.	Mr John Magongoa Magongoa	01/12/2013	Mmadikan a Sport Ground Public Meeting	Platreef will have training centres where young people will be trained.
When will training start and will Platreef educate the people about mining?	Ms Elizabeth Ngobeni Tshamahansi	01/12/2013	Mmadikan a Sport Ground Public Meeting	The training will start once the Mining Right is issued and training will be focused on mining and technical skills.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
The information on the studies undertaken by Digby Wells is appreciated, the environmental findings are impressive but the social aspect is not addressed satisfactory. A school programme must be initiated to educate and prepare the children to work at the mine one day.	Mr Isaac Nyoni Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	There is a plan to roll out awareness campaigns, a consultant has been appointed to undertake this process. Educational programmes are also being developed.
What has been done to date in terms of skills development?	Mr Madimetja Pale Mogalakwena Community Forum	28/11/2013	Focus Group Meeting	The mine will be highly mechanised, people will be trained to operate and maintain the machinery. Training will commence before mining takes place. Aveng is one of the companies that have been contracted for the construction of the shaft and Platreef has requested Aveng to employ from the local community and the local community will need to be trained.
What is the plan for skills development?	Ms Mokonyane Linah Victim Support Centre Mahwelereng/ Majalla Trading/CSF	20/11/2013	Mokopane Town Public Meeting	Skills development is addressed in the SLP.
There is a program (Mining Authority Program) by Platreef, who are the people being trained?	Mr Percy Motileng MCO Chairperson	20/11/2013	Mokopane Town Public Meeting	The Mining Qualifications Authority (MQA) provides certification for mining training provided by the mines. Once Platreef has been accredited, all training provided by Platreef will result in qualifications being awarded to participants.
Platreef does not need to build training centres, there are training centres in the communities already, if they are not up to the standard required then Platreef must develop them to meet the standard.	Mr Percy Motileng MCO Chairperson	20/11/2013	Mokopane Town Public Meeting	Platreef will consider partnerships with local training facilities.
What are the plans for skills development? (Schools/varsity) Will these skills be put to use at the mine?	Ms Hilary Knight Mokopane Chamber of	20/11/2013	Mokopane Town Public	The Social and Labour Plan includes skills development as well as bursaries for school and varsity students.



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Business		Meeting	
Thank you for the plans on Skills Development, this will have a positive impact on the community. Will training only be related to mining or will there be other opportunities? When these skills have been acquired will Platreef employ the people they have trained?	Ms Mokgatla Mzombane	20/11/2013	Mokopane Town Public Meeting	The training will be mining specific but the skills learned such as welding can be used outside of mining. The idea of training people will be so that these people can be employed on the mine.
Platreef should not have a minimum requirement of grade 12 because some people with lower education may be more capable to do the work than more educated people.	Ms Mokgatla Mzombane	20/11/2013	Mokopane Town Public Meeting	Thank you, your comment is noted.
How far is Platreef with their skills development programme implementation?	Mr Jack Mahlase Tshamahansi	17/11/2013	Tshamaha nsi Public Meeting	Skills development is part of the SLP and the SLP can only come into full effect once the Mining Right is issued. However, as a sign of goodwill, Platreef is already looking for tutors who will work at the skills centre which is to be developed. Letters were sent out to communities requesting for people who are interested in getting bursaries to study mining related courses. Platreef is in the process of giving out scholarships to primary school pupils as from next year.
Youth in the affected communities should be trained to operate the machinery that will be used so that there is no need to hire from outside the affected communities.	Mr Jacob Kekana Kgobudi Kgoro	14/11/2013	Mokopane Traditional Council Meeting	Platreef has an HR department which is responsible for all employment. When there is a shortage of staff Platreef CSR communicates with HR and vacancies are advertised. Platreef is trying to employ from all the affected communities but not everybody will get a job on the mine. The minimum requirement for employment is grade 12, but there will also be jobs created for unskilled people who are not in possession of a grade 12 certificate.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
When will those who will receive training and bursaries from Platreef start working in the mine?	Ms Jane Kekana	14/11/2013	Mokopane Traditional Council Meeting	Depending on the awarding of the mining right the construction of the mine will start in 2014 and the mine will become operational in 2018 / 19.
What is Platreef doing with the CVs that were submitted? Will there be an opportunity to update my skills profile on the database.	Ms Elizabeth Sekgakgapeng	11/08/2013	Mining Right Application Public Meeting	The employment process will follow a specific process which includes that CVs on the database be screened for potential candidates for employment opportunities. There will be an opportunity for people to update the status of their skills on the database.
What skills are required for construction of the Tailings Storage Facility (TSF) and how many people will be employed? Can skills acquired from Platreef be used at other companies/institutions?	Mr Mamotere Masehlaneng	11/08/2013	Mining Right Application Public Meeting	Specialised contractors will be appointed to design and construct the TSF and related infrastructure. As part of the team operating the processing facilities, people with specialist skills will be employed for the operation and maintenance of the TSF. These contractors will have to comply will the requirements of the Social Labour Plan and appoint 70% of people from the local community.
Platreef must use the income generated from this project to take care of the elderly in the community and give our children scholarships.	Mr Ledwaba Mzombani 7 Miles	11/08/2013	Mining Right Application Public Meeting	The process seeks to involve all members of the community with 2000 jobs being allocated for the project. Platreef are still going to deliver on that promise. There is also a budget allocated for training so that the necessary skills are acquired.
Is the skills survey that was undertaken by Digby Wells in 2012 still effective?	Ms Mashilo Mzombani	11/08/2013	Mining Right Application Public	The skills survey undertaken previously by Digby Wells forms the basis of the current audit conducted by the Department of Labour. However, the community must still participate in

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			Meeting	the process undertaken by the Department of Labour. As far as we are aware the data will be consolidated.
The Skills Audit processes and activities conducted by the Department of Labour and Barnstone are not explained to the people in detail	Mr Thako Leseka Mahwelereng Youth Council	11/08/2013	Mining Right Applicatio n Public Meeting	Barnstone's involvement with the Department of Labour is to develop a database where people all over the country can be registered so that future employers may have access to skilled people, and be able to identify the unemployed who have skills. This database will be made available to Platreef.
Skills development is of major concern. Issues pertaining to socio-economic development must be thoroughly addressed.	Mr Aubrey Langa Masehlaneng	07/07/2013	Public Meeting Magongoa	With regard to the skills development, Digby Wells developed a database of the skills and existing business in the Mokopane area. However, this was not completed. Industrial psychologists have been appointed in order to complete the process. This process will commence in September 2013. Platreef will establish an enterprise development program which will assists small businesses with finance and business skills.
The presentation made mention of skills development. There is uncertainty around the Skills Development and a Spatial Development Plan (SDP) that needs to be integrated and considered for this project. What is the SDP?	Mr Lekia Youth Member Masodi	07/07/2013	Public Meeting Magongoa	A Skills Survey was conducted by Digby Wells in order to have a database of the available skills in the area. Industrial psychologists have been appointed to further assess the database. There were also meetings held with the Department of Labour to address the issues related to skills development.  A Spatial development plan is a plan used by the municipality to do urban planning and should not

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				be confused with a Skills Development Plan also "SDP". The Skills Development Plan is contained in the Social and Labour Plan which will be implemented if the mining right is awarded.
I am against the concept of skills development as this usually results in people being taught how to perform hard labour such as brick-making.	Mr Lekia Youth Member Masodi	07/07/2013	Public Meeting Magongoa	The comment is noted.
Who will Platreef target for the development plan as the community would not want the mine to source specialists like geologists from outside the Province?	Mr Lekia Youth Member Masodi	07/07/2013	Public Meeting Magongoa	The SLP commits Platreef to employ locally as far as possible.
The mine must support local skills development and businesses in the area, and not to only provide training in order to empower the communities. There is a shortage of clinics and information centres in the community.	Ms Mabusi Mamodiyi Magongoa Zone 2 Refentse Community Development Forum	07/07/2013	Public Meeting Magongoa	As part of the SLP there is a section dealing with Local Economic Development this will be implemented should the mining right be awarded.
Made a plea to the youth of Mokopane to acquire the necessary skills without relying on the mine.	Mr Lekau Kekana Community Forum and ANC secretary leader	07/07/2013	Public Meeting Magongoa	Local youth could also receive training in terms of the SLP.
Platreef must take the 2000 people to be employed from the villages and train them in order for them to have the necessary skills to work for the mine. The affected people from the village must have first preference for employment opportunities.	Mr Elvis Molwatse Chairperson of Mokopane Interested and	07/07/2013	Public Meeting Magongoa	The SLP commits Platreef to local skills development and local employment. The plan will come into effect if the mining right is awarded.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Affected Community Committee (MIACC)			
Platreef must provide training to the local community's youth and in so doing; provide food, accommodation and education to such youth whilst they are undergoing training.	Mr Elvis Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	The SLP commits Platreef to local skills development including on the job training. Whether this will include accommodation is still to be decided.
<b>41 BENEFIT OF THE MINE / SOCIAL INVESTMENT</b>				
What criteria is used to appoint subcontractors because since these meetings began, Platreef has been using the same catering company?	Mr Bushy Ledwaba Moshate	01/12/2013	Mmadikan a Sport Ground Public Meeting	People were informed in previous meetings about the procurement system in place where companies can submit their documents and be added to the procurement database.
There are local economic development plans but only a few will benefit, Platreef must ensure that all affected parties benefit equally.	Mr Lesiba Lamola Kgubudi Community Forum	28/11/2013	Focus Group Meeting	The plans are developed to benefit as many people as possible.
The victim Support Centre is asking for donations from Platreef.	Ms Mokonyane Linah Victim Support Centre Mahwelereng/ Majalla	20/11/2013	Mokopane Town Public Meeting	The comment is noted.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Trading/CSF			
So will we have some percentage of the mine?	Mr ?	19/11/2013	Email	Platreef Resources is planning to put in place one of the broadest Black Economic Empowerment Structures, whereby the residents of Mokopane will benefit from the development and operation of the underground mine.  Platreef has been considering all of the feedback obtained during the BBBEE consultations, and will present the new structures for consultation with all the communities.
While Steve was presenting he mentioned how the business will benefit but he did not say anything about how the community will benefit. How will the community benefit?	Mr RS Manganyi Tshamahansi	17/11/2013	Tshamahansi Public Meeting	The people are given priority in everything that Platreef does; business people were informed to register themselves at the procurement office and the communities will benefit from the jobs which will be provided.
Will the community based organisations that were mentioned to be sponsored by Platreef continue to receive funding after mining operations have commenced or is it just another tactic to persuade communities to agree with the mining activities?	Mr Joshua Mojela Mosesetjane Ga-Sekgoboko Development	15/11/2013	Stakeholders Forum Meeting	Platreef is committed to the organisations it is supporting and will continue to do so during construction and once the mine is operational.
What business opportunities will arise from the TSF?	Mr Mamotere Masehlaneng	11/08/2013	Mining Right Application Public Meeting	The Enterprise Development Program will be rolled out in October 2013. Through this program, business opportunities will be identified.
What does the community stand to gain from the project underway? Will the community obtain shares in Platreef?	Mr Charles Rokgomote	11/08/2013	Mining Right Application	Regarding shares, the BBBEE transaction is ensuring that there are benefits for the local communities.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
			n Public Meeting	
Platreef indicated that they have invested R160 million in skills development and that R25 million will be spent to support local schools. Now the mine is discriminating by only wanting to employ people with qualifications. No proof of where the investment was spent has been provided.	Mr Robert Mogafe	12/07/2013	Stakeholders Forum Meeting	Platreef has been exploring in the area over a long period of time and the money spent on drilling and exploration activities included employment and procurement of local goods and services.
Platreef representatives always talk of money being spent for social development. But where is this money? If there was money invested then there would have been better schools and services. When asked, Platreef said it is a secret and they will not tell.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	Platreef is committed to spending money on social development in the SLP. The SLP which is still to be approved by the DMR has been presented at the Stakeholder Engagement Forum.
How will the community benefit from the mine?	Mr Simon Maluleke	07/07/2013	Public Meeting Tshamahansi	<p>The areas of benefit will include:</p> <ul style="list-style-type: none"> <li>• Shared infrastructure</li> <li>• B-BBEE Ownership</li> <li>• SLP</li> <li>• Enterprise- and Skills Development</li> <li>• Corporate Social Investment projects</li> </ul> <p>For example, Platreef is in talks with the Department of Education to potentially build a school of excellence in the area. In terms of skills development, there is R4 million that has been set aside for education in the SLP.</p>
What benefits will be received by the affected communities?	Mr Lekia	07/07/2013	Public Meeting Magongoa	A Business Enterprise Development company has been appointed to assess how the mine can assist in local skills development. The mine cannot employ everyone, but will try as far as possible to accommodate those who do not have

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				the necessary certificates and/or skills.
Platreef continues to indicate that they are spending money in the community but there is no evidence of this. If the mine can collaborate with the traditional leaders and communities, then the mine can continue. The communities will no longer participate in these meetings until such time that all issues are addressed with the communities.	Mr Donas Makhubela Tshamahansi	07/07/2013	Public Meeting Magongoa	Platreef is committed to spending money on social development in the SLP. Platreef will collaborate with all stakeholders on how and what the money will be spend.
Platreef was supposed to install computers; however, they have failed to do so.	Mr Donas Makhubela Tshamahansi	07/07/2013	Public Meeting Magongoa	Platreef has committed to assist schools as identified in the SLP with the installation of computer labs. This process will commence once the SLP has been approved by the DMR.
We as the people are the owners of land. When Platreef will mine the area, what benefits can communities expect from the mine?	Mr Machau Mzombane	7/07/2013	Public Meeting Magongoa	Jobs will be created, participation in the BBEE beneficiary trusts, enterprise development initiatives and growth in the local economy.
I have 12 cattle and a household within the fields' area. How will I benefit from the proposed operation?	Mr Dimpho Matlhaka Mzombane	07/07/2013	Public Meeting Magongoa	Platreef will enter into a surface lease agreement with all the identified community members with either grazing or ploughing land and compensate them as per an agreement still to be reached with the landowners.
Platreef has indicated that they have invested a lot of money in the area. Where did this money go to? Who received this money? Mr Motswaledi must tell the truth in front of the people as the people are still poor.	Mr John Chauke Tshamahansi	07/07/2013	Public Meeting Magongoa	The money was spend in drilling operations and explorations activities undertaken over many years leading to the discovery of mineral resources and now a potential mine.
Platreef does not comply with skills development requirements. There was a post advertised by the contractors. They wanted a matric and maths and science. A lot of youth dropped out of school to work for the mines. How are they supposed to get	Mr Mzombane Masenya	07/07/2013	Public Meeting Magongoa	Some of the employment opportunities will require Matric and Maths and Science as these are skilled jobs. Not everyone will be able to work on the mine as there will simply not be enough



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
opportunities if they are asked for qualifications?				jobs for everyone. The more qualified the applicant is for a job the more likely they are to receive a job. There will however be other employment opportunities as well for unskilled people.
<b>42 BULK SAMPLE</b>				
There are bulk sampling activities taking place without permission from the community, communities will apply for a court interdict to stop the mining activities, it is the only way to solve this problem.	Mr France Makhafola Masehlaneng Development Committee	01/12/2013	Mmadikan a Sport Ground Public Meeting	The was a separate EMP consultation process that took place for the Bulk-Sample Shaft Application during which the communities were consulted. The sinking of the bulk sample shaft is part of prospecting works programme.
Why is bulk sampling not shown on the Platinum Mining Process (slide 3)?	Mr Lesego Kgopule Mogalakwena Community Forum	20/11/2013	Focus Group Meeting	Bulk sampling forms part of prospecting.
Have the bulk sampling activities commenced?	Mr Lesego Kgopule Mogalakwena Community Forum	20/11/2013	Focus Group Meeting	Bulk sampling forms part of the prospecting stage of the process, activities have commenced with the construction of the wall around the shaft area.
We have placed it on record that the public consultation conducted for the Prospecting Right application was not conducted properly and is not accepted by the community. An Environmental Management Plan (EMP) amendment for the Platreef Bulk Sample was undertaken by Digby Wells but there is no knowledge as to the status of this report. Now the	Mr E. Honiball Attorney and Community Legal representative and representing	12/07/2013	Stakeholders Forum Meeting	The Bulk Sample application has been approved by the DMR. An EMP was submitted as part of the Bulk Sample application. The EMP was placed in the public domain on the Digby Wells website.

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community is being informed of the Mining Right Application (MRA) but no information was provided on the Bulk Sample.	Lawyers for Human Rights			
When will feedback from the previous meetings be given	Mrs Laena Baloyi	07/07/2013	Public Meeting Tshamahansi	The previous meetings held dealt with the Bulk Sample application from the DMR and feedback has been given to communities.
<b>43 SURFACE RIGHTS AGREEMENTS</b>				
The affected communities want an agreement that will serve both the interests of the community and Platreef.	Mr France Makhafola Masehlaneng Development Committee	01/12/2013	Mmadikana Sport Ground Public Meeting	Platreef agrees and notes the comment.
Surface use agreement was done beyond community's knowledge, doesn't benefit community	Mr Sello Jonas Kekana SANCO Mosestjane	04/12/2013	Fax	Surface use agreements were entered into with the relevant authorities as well as individual land owners.
The community needs proof of the signed Surface Lease Agreement.	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	Surface lease agreements are still to be negotiated with inputs from the DRDLR and the community.
The Surface Use Agreement and how it has been rolled out is of major concern. The relationship between the community and the traditional leadership is divided and taken advantage of by Platreef.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Platreef cannot become involved in divisions in the community. These issues need to be addressed by the communities themselves.
On the 15 February 2012, the DMR directed the Mine to disband the mining committees and to stop making payment to traditional leaders in accordance with the Surface Agreement and start	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Consultation with the communities was undertaken and the Stakeholders Forum has been established to replace the mining

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
consultation with the communities. The DMR should be present.				committees. The DMR has indicated that until the surface rights agreements have been sorted out that the payments should continue. The DMR are invited to all the meetings they seldom attend.
On the 3 January and 18 July 2013, the communities were victims of brutality and the mine was ordered to stop making payments to Chief Kekana and other tribal officials as this was only benefiting the minority groups.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Consultation with the communities was undertaken and the Stakeholders Forum has been established to replace the mining committees. The DMR has indicated that until the surface rights agreements have been sorted out that the payments should continue. The DMR are invited to all the meetings they seldom attend.
The community requested Platreef for new stakeholder engagement with involvement from the DMR. The mine can continue to “brag” that they have complied with the DMR requirements and have consulted. However, the consultation has not yet commenced.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Consultation with the communities was undertaken and the Stakeholders Forum has been established to replace the mining committees. The DMR has indicated that until the surface rights agreements have been sorted out that the payments should continue. The DMR are invited to all the meetings they seldom attend.
On the Platreef website dated March 2013, it was indicated by Platreef that four surface agreements that have been completed.	Mr Sello Kekana Mosesetjane	07/07/2013	Public Meeting Magongoa	Platreef has concluded surface use and compensation agreements over the grazing and ploughing lands the company is still to conclude surface lease agreements with inputs from the DRDLR.
The people in the villages are aware of the surface agreement signed but do not have the knowledge of when and by whom it was signed. We want proof of the signed agreement. This must be made public.	Mr Donas Makhubela Tshamahansi	07/07/2013	Public Meeting Magongoa	These documents may be made available upon written request.

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The people demand proof of the signed Surface Agreement.	Mr Oupa Mphila Mosesetjane	07/07/2013	Public Meeting Magongoa	Surface used compensation agreements have been made available to the DRDLR.
She is not happy with the Surface Agreement as stipulated by Platreef.	Ms Margaret Makgabo	07/07/2013	Public Meeting Magongoa	Surface used compensation agreements have been made available to the DRDLR.
It is the responsibility of the Department of Rural Affairs to be present at these meetings as well as to bring in evaluators who can assess and develop lease agreements for the communities.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	The DRDLR was present at the meeting and will be engaged regarding the development of new lease agreements.
The mine's drilling machines are still operating in the area but there are no surface agreements signed to date.	Mr Lekau Kekana KCF & MIACDF	07/07/2013	Public Meeting Magongoa	Surface used compensation agreements have been made available to the DRDLR.
People who signed the Surface Agreement contracts are not here today. This is a problem as everything is done in the Kgoros. How will information be received by the community if it is only circulated amongst the councillors of the Kgoros? Communities experience discrimination currently.	Mr Elphas Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	When the new surface rights agreements are finalised these will be made known to the communities.
Platreef must bring the document and proof of the Surface Rights Agreement for the fields prior to operations. Platreef must ask for forgiveness before any activities start.	Mr Elphas Molwatse Chairperson of Mokopane Interested and Affected	07/07/2013	Public Meeting Magongoa	New surface rights agreements are being processed together with the DRDLR once these are in place they will be available for the public to view.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Community Committee (MIACC)			
We demanded names of the individuals who signed the Surface Lease Agreement.	Mr Elphas Molwatse Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	New surface rights agreements are being processed together with the DRDLR once these are in place they will be available for the public to view.
According to the community, they want an agreement to be made. Until then, they will not talk. Platreef are thieves.	Mr John Chauke Tshamahansi	07/07/2013	Public Meeting Magongoa	The comment is noted, as explained there are new surface rights agreements being worked on and these will be negotiated with the affected communities and individuals.
The official from Department of Rural Development is not here. They must explain how the process must proceed without proper consultation.	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	The official was in fact in the meeting the new surface rights are being processed and the community will be informed as to how these agreements will be undertaken.
We want the names of the individuals who signed the Surface Lease Agreement.	Unidentified resident of Magongoa	07/07/2013	Public Meeting Magongoa	New surface rights agreements are being processed together with the DRDLR once these are in place they will be available for the public to view
From today's meeting, there are no agreements. If there is another company that wants to mine they should proceed.	Mr Mzombane Masenya	07/07/2013	Public Meeting Magongoa	The purpose of the meeting was to inform people of the environmental authorisation applications and the scoping documents not to reach agreements.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
<b>44 SECTION 93</b>				
Section 93 order was uplifted but 03 Jan and 18 July 2012 Brutality caused by Platreef securities was not addressed and Platreef deny all allegations to excuse themselves to pay compensation.	Mr Sello Jonas Kekana SANCO Mosestjane	04/12/2013	Fax	The decision to lift section 93 was made by Department of Mineral Resources (DMR) and Platreef held several meetings to inform communities of this development, DMR advised that the meetings be held at neutral locations. The DMR and the DRDLR were happy with the consultations which took place and therefore lifted the section 93.
How was section 93 lifted without the affected communities being consulted?	Mr J Manamela Mzombane	15/11/2013	Stakeholders Forum Meeting	On 4 June 2013, a meeting was held with the leaders of Mokopane to inform them that the DMR has lifted the Section 93 of the MPRDA. The outcome and reasons were presented to those who attended the meeting. One of the points indicated in the Section 93 lifting was that Platreef must continue to consult with the communities, thus engagements will continue.
Which communities were consulted to uplift section 93	Mr Thabo Morwaswi Mzombane	15/11/2013	Stakeholders Forum Meeting	Platreef consulted with all the affected communities as required by the DMR. The DMR conducted its own studies and decided that the section 93 should be lifted. The decision was not taken by Platreef.
The minutes from previous meetings are still outstanding but the process of engagement is still continuing.  The lifting of the Section 93 is continuing for the drilling whilst the response has not been provided to the communities. What were the reasons for the lifting of the Section 93 in terms of the MPRDA? Are we going to get answers or wait for the legal team	Mr Lukas Nkuna	12/07/2013	Stakeholders Forum Meeting	See responses below.

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whilst the communities are being affected? This includes the Moloto family who still do not have access to water due to prospecting activities.				
The community heard that the Section 93 which was imposed on Platreef has been lifted, but the community has no knowledge of how, when, by whom and on what bases was the Section 93 lifted.	Mr E. Honiball Attorney and Community Legal representative and representing Lawyers for Human Rights	12/07/2013	Stakeholders Forum Meeting	On 4 June 2013, a meeting was held with the leaders of Mokopane to inform them that the DMR has lifted the Section 93 of the MPRDA. The outcome and reasons were presented to those who attended the meeting. One of the points indicated in the Section 93 lifting was that Platreef must continue to consult with the communities, thus engagements will continue.
When Platreef received the Section 93, the communities, DMR and Platreef indicated that they will work together. Platreef was informed that the Public Participation Process (PPP) should be of public knowledge and not to individuals only. Also it was said that prior to activities, Platreef must communicate and get an understanding with the communities prior to starting their drilling. The lawyers were not properly consulted. So how can the entire process continue without proper information, consultation and documentation?	Mr Molwatsi Magongoa	12/07/2013	Stakeholders Forum Meeting	The conditions for the lifting of the Section 93 have been met and this is why it has been lifted.
I can see that the consultations are still continuing. Has there been an agreement reached between the communities and the mine in terms of the mine continuing its operations?	Mr Daniel Phele Magongoa Zone 1	07/07/2013	Public Meeting Magongoa	More than often Platreef is accused for not fulfilling their promises in most of the meetings. During the previous meetings in February, everyone agreed that they want to see the mine developing in the area but things must be conducted correctly. If the mine was not in agreement with the communities, they would continue with their operations. However, the mine believes that there will be an understanding with

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
				<p>the communities through on-going communication and consultation.</p> <p>As people have indicated, the mine has taken the decision that they will continue to mine.</p> <p>According to Platreef, there is an agreement with the communities that mining must proceed. The DMR then informed the mine to proceed with the Mining Right Application (MRA) and continue to conduct engagements with communities. This meeting forms part of the engagements for the MRA.</p> <p>The majority of affected people in the area indicate that land has been damaged due to the drilling of holes and thus compensation is required. It is important to note that the mine did stop its prospecting operations due to the DMR's Section 93 decision. People must understand what the facts are. There were meetings held with the officials from the DRDLR and the DMR. The mine has invited the DMR to come to these meetings.</p>
<p>The relationship with the community and the traditional leadership gave rise to the Section 93 directive being issued. In terms of the Minerals and Petroleum Development Act (MPRDA), this means that the mine was ordered to rectify what they had done to the communities. The rectification has not been started by Platreef.</p>	<p>Mr Sello Kekana Mosesetjane</p>	<p>07/07/2013</p>	<p>Public Meeting Magongoa</p>	<p>The conditions for the lifting of the Section 93 have been met and this is why it has been lifted.</p>
<p>In terms of the March report, it is stated that the Department of Rural Development and Land Reform was present at meetings;</p>	<p>Mr Sello Kekana</p>	<p>07/07/2013</p>	<p>Public Meeting</p>	<p>The Department was present at all the meetings dealing with the lifting of the Section 93.</p>



COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
this is not true.	Mosetjane		Magongoa	
In terms of Section 93 of the MPRDA, it was indicated that Platreef must consult and engage with the communities but this has not happened. It was indicated that there must be structures formed, but to date this has not happened. Therefore the drilling machines must stop operating immediately.	Mr Elvis Molwate Chairperson of Mokopane Interested and Affected Community Committee (MIACC)	07/07/2013	Public Meeting Magongoa	The requirements of the Section 93 were met by Platreef and this is why the restrictions were lifted.
<b>45 DRAFT SCOPING DOCUMENT</b>				
The Scoping Report was not compiled in a month or two months due to studies that have been done a long time ago. I&APs are expected within a very short space of time to comment on all of this information. The time period must be lengthened to give I&APs time to consult specialists and to comment in detail.	Mr E. Honiball Attorney and Community Legal representative and representing Lawyers for Human Rights	12/07/2013	Stakeholders Forum Meeting	It should be noted that due to timeframes stipulated by the DMR under the (MPRDA to consult within the 30 days period, it is required that all comments be gathered during this timeframe. However, the public can still provide comments until the Scoping Report is submitted, even during the Impact Assessment phase comments can be received. Therefore, there is still sufficient time for the public to comment.
We will comment in writing to Digby Wells on the scoping document.	Mr E. Honiball Attorney and Community Legal representative and representing Lawyers for	12/07/2013	Stakeholders Forum Meeting	At the date of compilation of this CRR no comments had been received.

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
	Human Rights			
I will be commenting formally on the Scoping Report. Digby Wells has ignored the issues below which need to be addressed in their studies:	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	The comment is noted.
1. In the report, Digby Wells has not acknowledged that the area is densely populated. The socio economic impacts due to the highly populated area must be properly investigated. Specifically, impacts on people in terms of their basic needs.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	The Social Impact Assessment formed part of the impact assessment undertaken for the project.
2. The meeting was arranged badly. A bigger venue should have been organised; there were several screens not working and people could not hear the presentation as the venue was too small.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	A bigger tent will be arranged for the next meetings and it will be ensured that the audio visual equipment is working.
3. The area is water-scarce. Water is a challenge. The Municipality is struggling to supply basic services one of them being water. I am of the opinion that the Draft Scoping Report does not address the issue of water significantly.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	A comprehensive surface and ground water study will form part of the impact assessment phase of the ESIA. The specialist study can be reviewed.
4. Digby Wells must note that there is existing information available on the Mogalakwena River completed by Professor Terence McCarthy and the Centre for Environmental Rights and World Wide Fund for Nature (WWF) which includes a complete study of the ecosystem. The area which will be mined is a very unique system (three river system functions). This must be studied. The entire ecosystem not only in the project site. The people depend on the river. The source of water for the mine is of concern as the communities also depend on the same water.	Mr Emile Honiball	07/07/2013	Public Meeting Magongoa	The comment was noted and the specialists were made aware of the studies mentioned.
What is the exact date of when the reports will be complete?	Mr John	07/07/2013	Public	The scoping reports were made available for public review until 1 August 2013. The final

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	Magongoa		Meeting Magongoa	scoping report was submitted to the DMR on the 16 August 2013.
<b>46 LEGAL LETTERS</b>				
RE: MOKOPANE INTERESTED AND AFFECTED COMMUNITY COMMITTEE / PLATREEF RESOURCES (PTY) (LTD)	Lawyers for Human Rights	10/07/2013	Letter	Platreef Resources (Pty) Ltd ("Platreef") // Mokopane Interested and Affected Community Committee ("MIACC") Responses provided by Webber Wentzel
1. The above matter and your letter dated 3 July 2013 refer.	Lawyers for Human Rights	10/07/2013	Letter	<p>1. We refer to your letters dated 10 July 2013 and 11 July 2013. These letters revisit the substance of the previous communications addressed by you to Platreef. Our response should therefore suffice as responses to those letters as well.</p> <p>2. We will respond to the issues you raised in these letters in the order that you raise them. We deal firstly with the letter of 10 July 2013, and thereafter with the letter of 11 July 2013.</p>
2. We are instructed by and represent the Mokopane Interested and Affected Community Committee (hereinafter "MIACC" or "our client"), whom as you are aware, are affected by Platreef Resources (Pty) Ltd ("Platreef" or "your client") prospecting and proposed mining operations in Mokopane.	Lawyers for Human Rights	10/07/2013	Letter	<p>3. In paragraph 2 of your letter, you mention that you act on behalf of MIACC, who you state is an interested and affected party ("IAP") in the context of Platreef's prospecting and proposed mining activities. Platreef recognises, inter alia, all persons living in the affected communities, villages and/or areas as IAPs. However, it has thus far not been clear to Platreef precisely whom you represent. This issue was raised during the meeting between Platreef and yourselves on 26 June 2013, where Platreef repeatedly requested that you clarify exactly whom you were</p>

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				<p>representing within MIACC. Platreef explained that it was important for the company to be in a position to understand whom you were representing, particularly given that Platreef regularly engages members of the community claiming to be MIACC members. Platreef specifically requested membership lists and/or powers of attorney evidencing the membership of MIACC. Your response to this request was non-committal.</p> <p>4. Throughout your interactions with Platreef, there have been a number of allegations that Platreef is not recognising and/or consulting with your clients. It is impossible for Platreef to investigate these claims and/or address the situation without knowing who your clients are and which members of MIACC you represent, alternatively who the members of MIACC are. Accordingly, we reiterate the request for disclosure of MIACC's membership and which members of MIACC you represent. We do not require powers of attorney at this stage; membership lists and the names of those members whom you represent will suffice for present purposes.</p> <p>5. We place on record that Platreef has consistently invited MIACC to meetings to discuss various issues relating to the project. MIACC is a signatory to the Memorandum of Understanding of the Stakeholder Engagement</p>

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				<p>Forum, which was formed by Platreef and a number of important stakeholders to serve as a convenient forum for engaging stakeholders on these matters, sharing information and addressing concerns. This illustrates the fact that Platreef recognises MIACC as an important stakeholder. It has come to Platreef's attention, however, that there appears to be certain disagreements within the membership of MIACC. Moreover, it is unclear to Platreef who the members of MIACC are and/or who is authorised to represent and take decisions on behalf of MIACC in its engagements with Platreef. In this context, our client requires the requested information in order to gain clarity as to who it is dealing with and what the legitimate views and concerns of the members of MIACC are. Furthermore, our client, in the meeting of 26 June 2013, pointed out that MIACC was not a properly constituted representative body and you conceded that, in fact, MIACC had not yet done so and was in the process of registration. Our client had requested from you the founding documents of MIACC and would appreciate it if you could forward same as soon as possible.</p>
Requests for Information	Lawyers for Human Rights	10/07/2013	Letter	
3. Since being instructed by MIACC in May 2012, we have sought to advise them as and when their rights have been or are	Lawyers for Human Rights	10/07/2013	Letter	6. With reference to paragraph 3 of your letter, we note firstly that it is encouraging for our client

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<p>being affected by your client’s aforementioned operations. Since this time we have sought to establish a working relationship with your client, as well as obtain information pertaining to your client’s operations in Mokopane in order to properly advise our client</p>				<p>to learn that you seek to establish a working relationship with Platreef. Unfortunately, at the meeting on 26 June 2013, our client did not get the impression that you were, in fact, seeking to establish a working relationship. In fact, our client perceived your attitude as rather hostile and uncooperative. Nevertheless, from your correspondence it appears that you are committed to assisting in ensuring a full and legitimate consultation process in relation to our client’s Mining Right Application ("MRA") and related issues. Our client is equally committed to this common purpose, namely, ensuring that the consultation process complies fully with the legal framework that informs it.</p> <p>7. As you will be aware, this legal framework is set out in the Mineral and Petroleum Resources Development Act, 2002 ("MPRDA"), and the National Environmental Management Act, 1998 ("NEMA"). Our client clearly communicated to you in the above-mentioned meeting that it intends to, and is obliged to, comply with these statutes fully. Of course, our client cannot afford one interested and affected party preferential treatment which is not statutorily warranted and/or not afforded to other interested and affected parties. This compliance with the statutes is the guiding principle that must and will determine the level of information that your client is entitled to during the consultation process. This</p>

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				<p>was also stated explicitly by our client during the meeting of 26 June 2013.</p> <p>8. You will further appreciate that the consultation process Platreef has embarked on is a complex process with large numbers of IAPs and other stakeholders. For example, the population of the greater Mogalakwena Municipality is approximately 300 000 people, while the population of the areas in the immediate vicinity of Platreef's project area is around 100 000 people.</p> <p>9. Practically, Platreef cannot consult with every individual in the area on a one-on-one basis. In cases like the present, consultation as required by the MPRDA and NEMA must necessarily take place on a broader basis, including consultations at mass meetings of the affected communities, consultations with community leaders (both formal and informal) and other recognised structures. Of course, every individual in the area is entitled to attend these meetings, ask questions, raise concerns and provide comments. You are well aware of this, as you and other members of your team have personally attended at several of these mass meetings. Mr EJ Honiball has also been present at many of these meetings and has openly claimed to represent Lawyers for Human Rights at said meetings.</p> <p>10. Given the complexity of the process, Platreef</p>

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				has gone to great lengths, and continues, to afford every IAP a reasonable opportunity to participate in the consultation process. In addition to the efforts mentioned above, Platreef has also made the relevant information available through its Corporate Social Responsibility Office ("CSR Office"). Requests for information may also be relayed through Community Liaison Offices ("CLOs") which are located within five of the directly affected communities.
4. We record that our recent correspondence to your client, and our requests for information necessary to advise our client of their rights, have largely remained unanswered.	Lawyers for Human Rights	10/07/2013	Letter	11. In relation to paragraph 4 of your letter, we reiterate that your clients have, thus far, had exactly the same opportunities as every other IAP to attend consultations and obtain the information made available to IAPs. In any event, we will accommodate your requests for information, set out in the first paragraph 5 and the first paragraph 6 of your letter, on the basis set out below:
5. In this regard we refer specifically, but not exclusively, to the following correspondence sent to your client's offices:	Lawyers for Human Rights	10/07/2013	Letter	
6.1. Our request for a copy of the detailed formal Broad-Based Black Economic Empowerment proposal dated 30 May 2013;	Lawyers for Human Rights	10/07/2013	Letter	11.1 ad paragraph 6.1: we enclose under cover of this letter a copy of the detailed Broad-based Black Economic Empowerment ("BBBEE") proposal dated 31 May 2013;
6.2.1. adequate notice of all planned meetings, including but not limited to community meetings regarding engagement;	Lawyers for Human Rights	10/07/2013	Letter	11.2 ad paragraph 6.2.1: as far as public participation meetings for purposes of the MPRDA and/or NEMA are concerned, notices for



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				these meeting are placed at numerous strategic locations (usual areas for placement of public notices) situated in the relevant communities, , at CLOs, the CSR Office, and published in local newspapers. The meetings were also announced by a series of loud-hailing throughout the communities on the two days prior to the meeting. As far as meetings to discuss the BBBEE proposal is concerned, our client will notify IAPs of the relevant further meetings as and when the dates and times for these meetings are arranged. In any event, our client will notify MIACC of these meetings by email via your offices;
6.2.2. all proposals that are discussed in the aforementioned meetings;	Lawyers for Human Rights	10/07/2013	Letter	11.3 ad paragraph 6.2.2: the information requested here is included in the enclosed BBBEE proposal dated 31 May 2013;
6.2.3. pamphlets that are provided in the meetings;	Lawyers for Human Rights	10/07/2013	Letter	11.4 ad paragraph 6.2.3: the requested information is enclosed herewith;
6.2.4. registers that are signed in these meetings;	Lawyers for Human Rights	10/07/2013	Letter	11.5 ad paragraph 6.2.4: the requested registers are provided herewith in redacted form. The registers record the personal contact details and/or addresses of the relevant individuals. Our client is not legally permitted to disclose these personal details without the consent of the individual concerned. Accordingly, our client has redacted this information;
6.2.5. reports and minutes that are drawn up by Platreef after	Lawyers for	10/07/2013	Letter	11.6 ad paragraph 6.2.5: the meetings you

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the meetings are concluded;	Human Rights			referred to in your letter of 30 May 2013 refers to meetings which were held in April and May 2013. These meetings pre-date the MRA and relate to the broader project, including the BBBEE transaction. The information you seek is essentially covered in the BBBEE proposal made available as per paragraph 11.1 above. The meetings were information sessions regarding these issues, and given the nature of the meetings, the number of meetings that have been held, and the repetitive nature of questions raised and addressed at these meetings, the most useful manner in which to address your request for information is to refer you to the detailed BBBEE proposal;
6.2.6. a detailed timeframe of planned activities relating to the prospecting under the amended EMP; and	Lawyers for Human Rights	10/07/2013	Letter	11.7 ad paragraph 6.2.6: the amendment of Platreef's Environmental Management Plan ("EMP") involved a consultation and public participation process, in which your client was free to participate and during which the relevant practical impacts of the proposed bulk sampling was communicated to IAPs. However, a detailed time frame does not yet exist, as it will depend entirely on whether and when the application for permission to conduct bulk sampling is approved and the terms of such approval. At that stage, the timeframes will be communicated to IAPs, as they are developed, and when necessary. It should be noted that the bulk sampling process will be a continuation of the prospecting activities

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				that have been taking place over the past years, does not constitute a fresh prospecting or mining activity;
6.2.7. How and when Platreef intends to inform the community of these activities.	Lawyers for Human Rights	10/07/2013	Letter	11.8 ad paragraph 6.2.7: we reiterate that the bulk sampling will constitute a continuation of Platreef's current prospecting activities. Platreef will inform relevant stakeholders of its activities as and when the need arises.
6.3. Our request dated 14 June 2013 for a copy of Platreef's mining right application, which application our clients were only made aware of through a newspaper article notwithstanding their placing on record their registration as an interested and affected party on 11 October 2012.	Lawyers for Human Rights	10/07/2013	Letter	11.9 ad paragraph 6.3: firstly, your client's registration as an interested and affected party in October 2012 does not entitle it to prior notification of the submission of Platreef's mining right application. The public was generally made aware of the submission of Platreef's MRA through the media, after it took place. Your client is not entitled to preferential treatment in this regard; this is not a legal requirement. Secondly, your client is not entitled in law to a copy of the MRA. It is not open to your client to usurp the regulatory role of the Department of Mineral Resources ("DMR") in reviewing the MRA. As mentioned by the Constitutional Court in <i>Bengwenyama Minerals (Pty) Ltd and Others v Genorah Resources (Pty) Ltd and Others</i> [2010] ZACC 26 ("Bengwenyama") (in the context of prospecting right applications, but we submit the principles are the same in relation to mining right applications), one of the main purposes of consultation is to enable the relevant IAPs to

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				<p>understand the impact that the granting of a prospecting or mining right will have on them and to see whether some accommodation is possible between the applicant and the IAPs insofar as the interference with the IAPs' rights are concerned. For this purpose, consultation must be aimed at providing IAPs with the necessary information on everything that is to be done so that they can make informed decisions in relation to the representations to be made, whether to use the internal procedures if the application goes against them and whether to take the administrative action on review. In our view, this objective will be achieved if the IAPs are provided with sufficient information regarding the proposed mining activities and the impacts they will have, but does not require disclosure of the MRA itself. This information, including the manner in which mining activities will be undertaken, the proposed time frames for these activities, the environmental impacts of the mining activities and the benefits that are expected to accrue to the local communities through the proposed BBEE structure has been, and will continue to be, discussed at various public participation meetings. Our client is also of the view that this consultation process is subject to mutual respect and individuals or groups who do not conduct themselves accordingly clearly act contrary to the spirit of consultation;</p>

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6.4. Our latest request dated 24 June 2013 requesting a copy of the Social and Labour Plan, which according to the Background Information Document attached to the Notice to Interested and Affected Parties from Digby Wells (which we received from colleagues at the Environmental Wildlife Trust) of 21 June 2013, has been developed and is awaiting approval.	Lawyers for Human Rights	10/07/2013	Letter	11.10 ad paragraph 6.4: as far as the social and labour plan ("SLP") is concerned, we point out that it is essentially an undertaking given by the applicant in favour of the DMR, with a significant level of input from the local municipality. As such, the SLP does not directly concern the IAPs, and your client is not entitled to the actual draft SLP. However, our client has communicated the proposed terms of the SLP, as it currently stands, to the relevant IAPs, including the communities of which your clients are members. These are contained in a presentation which was given at a number of public participation meetings. We enclose a copy of this presentation herewith.
5. You will appreciate that receipt of this information is pertinent to our providing our clients with advice – and to ensuring meaningful (and therefore adequate) consultation on your client's part.	Lawyers for Human Rights	10/07/2013	Letter	12. With reference to the second paragraph 5 of your letter, we reiterate that the consultation process is prescribed by law and informed by the principles as discussed in <i>Bengwenyama</i> . While Platreef is committed to adequate and meaningful consultation with your client, this does not mean that your client is entitled to full copies of each and every document submitted to the DMR as part of its mining right application. As stated before, your client is not entitled to preferential treatment over other IAPs. We have set out above the information which our client is obliged to make available, and hereby makes available, to your client. We trust that this will suffice.

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6. In an effort to establish a working relationship founded on information sharing, we requested a meeting at your client's offices on 26 June 2013 and on instructions from our client. It was attended by Jasmine Abrahams, Jeremy Michaels, Bernard Botha and a person introduced as 'Gopalong' of Platreef, and by Jacob Van Garderen, Emma Algotsson, Louise du Plessis, Nathaniah Jacobs, Gina Snyman and Wayne Ncube from Lawyers for Human Rights.	Lawyers for Human Rights	10/07/2013	Letter	Noted.
7. Prior to this meeting, and in our correspondence arranging it, your client indicated to our offices that they would be providing us with the documents we had requested, at the meeting.	Lawyers for Human Rights	10/07/2013	Letter	13. With reference to paragraphs 7 and 8 of your letter, we reiterate that our client experienced the attitudes of your representatives at the meeting as hostile. It is a pertinent fact that the meeting was, in fact, scheduled to take place a week earlier on 20 June 2013 but was called off by yourselves with just more than half-an-hours' notice. You will recall that Mr Jeremy Michaels, Vice-President: Communication and Public Affairs of Ivanplats, had expressed his disappointment per letter on the same day. The meeting was then rescheduled to take place on 26 July 2013. Mr Michaels, who led the Platreef delegation, explicitly stated at various points during the meeting that the meeting had been called in good faith with a view to establishing a working relationship with yourselves but later recorded that your conduct during the meeting left much to be desired, calling into question your motives and the good faith in which the meeting was meant to take place. Furthermore, our client
8. We record, however, that your client indicated at this meeting that they were not obliged to share any of this information with us, which, they advised, had in any event been purportedly shared with some members of our client. We further record that no indication could be given regarding whom the requested information was provided to, apart from the general direction of the chief, which as you must be aware, can in no way be construed as remotely adequate consultation with a large community comprised of individuals.	Lawyers for Human Rights	10/07/2013	Letter	

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				<p>had, in fact, in keeping with its earlier commitment via e-mail, prepared a pack of information to be provided to yourselves at the meeting, but given the manner in which the meeting unfolded our client was hesitant to provide you with the information and decided to enlist the services of legal advisers first. We point out, further, that our client's attitude has never been that your client is not entitled to any of the information you sought, but that the level of information to which your client is entitled must be informed by the applicable legal principles. The tone of your letter in this regard amounts to a distortion of what transpired at the meeting. Our client has never refused to provide MIACC with the information it is legally entitled to, and any suggestions to the contrary, whether in correspondence between our clients or at meetings with the broader communities, are false and unnecessarily sabotage the relationship between Platreef, MIACC and the communities.</p> <p>14. As far as the channels for distribution of the information is concerned, we record that our client does not only provide the information to the traditional authorities. At the meeting, our client's consultant, Mr Werner Botha of Barnstone, commenced to explain the broad consultation process in respect of the BBBEE as well as the distribution of the trust documents to your representatives. No sooner had he started</p>

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				referring to distribution of the documents to the traditional authority, than immediately, some of your representatives threw their arms in the air in a gesture which demonstrated their extreme displeasure and exasperation. It is difficult to speculate on the precise reasons for this attitude, but it appears that your representatives assumed that our client was communicating only with the traditional authority, to the exclusion of other IAPs. However, all the relevant information is available to anyone through request from the CSR Office and the CLOs.
Other concerns	Lawyers for Human Rights	10/07/2013	Letter	Comment noted.
9. In addition, our clients have instructed us to place on record other of their concerns, some of which were raised by your client in the course of our dealings with them. In this regard we outline the following:	Lawyers for Human Rights	10/07/2013	Letter	Comment noted.
9.1. Our client is a voluntary association comprising of some few hundred households from five of the villages directly affected by your project, namely Tshamahase, Ga-Magongwa, Ga-Kgobudi, Mzobane and Masodi. That they comprise only a portion, and we contend a sizeable one, of the affected community, is of no consequence in light of their established and entrenched right to be consulted and apprised of all developments impacting them directly and indirectly as a result of your client's operations. It is thus manifest that any meaningful consultation with our clients must include their access to pertinent information already and easily at your disposal.	Lawyers for Human Rights	10/07/2013	Letter	15. In relation to paragraphs 9.1 and 9.2 of your letter, we note that these paragraphs again raise the important question as to who you actually represent. That said, our client does not disregard the interest of any IAP, but reiterates that your client cannot be given preferential treatment. Accordingly, your client will be given access to the same information that all other IAPs are entitled to. In any event, our client denies that your client ever communicated its wish for you to be "apprised of all information and



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9.2. In this regard, the MIACC have made it patently clear to your client directly, and through our correspondence, that they have briefed us as their attorneys to protect their interests, as they are entitled to do. They have also made their wishes clear that they wish us to be apprised of all information and documentation.	Lawyers for Human Rights	10/07/2013	Letter	documentation". Even if it did, you would not necessarily be entitled to all information and documentation, but only the information and documents to which IAPs are, in law, entitled.
9.3.As was mentioned at the aforementioned meeting with your client, there are serious language and literacy issues amongst the members of our client, to the extent that at community meetings we have attended and hosted, there have been difficulties of many to even sign attendance registers. It is accordingly crucial that the detailed written versions of the plans verbally summarised to the affected community, are provided to us. This has been requested from your client in our aforementioned correspondence. By your client's refusal to do so, there can be no suggestion that our clients have been adequately consulted or apprised of the details of Platreef's proposed project.	Lawyers for Human Rights	10/07/2013	Letter	16. Ad paragraph 9.3: Our client is aware of the literacy challenges faced by many of the members of the various communities involved. However, our client finds it difficult to believe that the illiteracy can be so severe that your members are not even able to sign the attendance registers and/or misconstrue its purpose. In our client's experience, persons claiming to be members of MIACC have consistently refused to sign the attendance registers despite clearly being able to do so. As far as your request for "detailed written versions" of the information orally presented to the affected communities is concerned, we refer to the information that our client is making available as set out in paragraph 10 above. The documents mentioned there form the essence of what is discussed at the meetings. In any event, "failure" to provide your clients with written versions of the information orally transmitted does not amount to a failure to consult adequately.
9.4.Lastly, as has been communicated to your client previously, we record that our clients do not accept that attendance	Lawyers for Human Rights	10/07/2013	Letter	17. Ad paragraph 9.4: Platreef has never suggested that signature of attendance registers

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registers of Platreef community meetings constitute approval of, or consent to, any of the proposals discussed at these meetings.				demonstrate consent or approval of matters discussed at a meeting. That said, persons claiming to be members of MIACC routinely refuse to sign attendance registers.
Clarification regarding Amended EMP	Lawyers for Human Rights	10/07/2013	Letter	
10. According to Ivanplats' (of which Platreef Resources) "News Releases" of 10 June 2013, the Platreef Bulk Sample Application was lodged with the DMR in Polokwane in September 2012 and is awaiting approval. Kindly clarify whether Platreef Resource's application for an amended EMP to undertake bulk sampling has been approved, and when Platreef intends to begin its bulk samplings activities	Lawyers for Human Rights	10/07/2013	Letter	18. Ad paragraph 10: The application for the amendment of the EMP has been submitted and is awaiting comments from various government departments. Platreef will commence bulk sampling upon approval of the amended EMP and the application for permission to conduct bulk sampling, and subject to the terms of the relevant approvals. No further information that has not been publicly announced is available at this stage.
Clarification regarding Draft Scoping Report and timeframe for comments.	Lawyers for Human Rights	10/07/2013	Letter	
11. We received notification from the Environmental Wildlife Trust ("EWT") via the Centre for Environmental Rights ("CER") that on 21 June 2013 Digby Wells, appointed by Platreef Resources to undertake the Environmental and Social Impact Assessment for the Platreef Project, issued a Notice of Applications for Environmental Authorisations and Licenses.	Lawyers for Human Rights	10/07/2013	Letter	19. Ad paragraphs 11 to 13: these paragraphs misrepresent a number of unconnected half-truths in a manner that is intended to imply some sinister conduct and motives on Platreef's part. Firstly, the status of the Environmental Wildlife Trust ("EWT") and the Centre for Environmental Rights ("CER") as registered IAPs or not is entirely irrelevant: in cases like these, as a matter of practice and based on past experience, Platreef's environmental consultants, Digby
12. For your information, EWT is not registered as an interested and affected party for Platreef's Project. On 11 October 2012, however, we addressed correspondence to your client on instructions from MIACC placing MIACC on record as an	Lawyers for Human Rights	10/07/2013	Letter	

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interested and affected party.				Wells, automatically send notices of this kind to the EWT via the CER. Secondly, there was no failure on Platreef's part to notify anyone of these applications: the notices were published, inter alia, in the local newspapers, as required by law. <u>Thirdly, and most importantly, Platreef specifically sent a notification of the fact that the Draft Scoping Report was available to MIACC, via email, on 21 June 2013 (the same day that the EWT and CER were notified).</u> Finally, your letter suggests some inordinate delay by Platreef in providing you with the Draft Scoping Report. Suffice to say that your letter was dated 24 June 2013 and you received a copy of the Draft Scoping Report the very next day.
13. Given Platreef Resources', and Digby Wells' failure to notify us and our client of the Notice of Applications for Environmental Authorisations, on 24 June 2013 we addressed correspondence to your client and Digby Wells placing on record their failure to do so, and calling for copies of the Draft Scoping Reports for both NEMA and the MPRDA.	Lawyers for Human Rights	10/07/2013	Letter	
14. On 25 June 2013 Digby Wells provided us with a copy of the Draft Scoping Reports for both NEMA and the MPRDA. In terms of the Draft Scoping Report, interested and affected parties are advised that the reports are available for public review until 10 July 2013. The Notice to Interested and Affected Parties however advises that the Reports are available for public review from 21 June to 1 August 2013. Please confirm that the correct date is 1 August 2013. Additionally, given the nature and far-reaching impact of the Scoping Reports, we formally request an extension until 31 August 2013 to comment on the Draft Scoping Reports and to allow us sufficient time to receive feedback from our independent experts in order to properly advise our clients and prepare comment. We trust that you will agree that this is reasonable, and provide confirmation that the MIACC's comments on the Draft Scoping Report will be accepted up until	Lawyers for Human Rights	10/07/2013	Letter	20. Ad paragraph 14: it should be noted that there are two distinct processes, the one relating to the Draft Scoping Report for purposes of NEMA and the other relating to the Draft Scoping Report for purposes of the MPRDA. In terms of NEMA, read with the relevant determination by the Limpopo Department of Economic Development, Environment and Tourism ("LEDET"), the Draft Scoping Report must lie open for inspection and public comment for a period of one calendar month from the date of publication of the notice. As the notice was published on 21 June 2013, in order to make sure the Draft Scoping Report is available for a full calendar month, the date for comment has

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31 August 2013				<p>been set at 1 August 2013. As far as the MPRDA is concerned, the Draft Scoping Report must be submitted to the Regional Manager of the DMR within 30 days of the date on which the applicant receives a notice from the Regional Manager to notify and consult with IAPs. The legislated time frames informed the wording of the notice.</p> <p>21. It should be noted that, while the Draft Scoping Reports are required, by law, to be available for public scrutiny and comment for periods of one calendar month (in the case of NEMA) and 30 days (in the case of the MPRDA), as set out above, IAPs have the opportunity to comment on these documents until the Final Scoping Reports are finalised for submission to the DMR, LEDET and the Department of Environmental Affairs. After this submission, all subsequent comments will be included in the Draft and Final Environmental Impact Assessment ("EIA") Reports and the EMP. Therefore, although on the face of it the review periods for the scoping documents end on 1 August 2013 (NEMA) and/or 30 days after receipt of the relevant notice from the Regional Manager of the DMR, comments may still be submitted after these dates as they will be included either in the Final Scoping Reports or in the EIA phase of the project. In any event, all comments received from IAPs throughout the environmental</p>

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				<p>authorisation process will be included in the Comments and Response Report which will be appended to the EMP.</p> <p>22. In the circumstances, your clients need not fear that they will be deprived of the opportunity to comment on the Draft Scoping Reports. While our client will ensure that, at a minimum, it complies with legislated timeframes in respect of public comment on the Draft Scoping Reports, IAPs will have an opportunity to comment on the documents well beyond the advertised dates.</p>
<p>15. Finally, we record that we were advised by your client at the aforementioned meeting that they act in good faith, and further that it is purporting to be acting in the interests of and for the benefit of the affected community. In this context, we cannot see any difficulty in Platreef sharing the requested information with us in order for MIACC to be properly and independently advised by us. Indeed, we are of the view that by doing so, Platreef would add legitimacy to its consultation processes with our client.</p>	<p>Lawyers for Human Rights</p>	<p>10/07/2013</p>	<p>Letter</p>	<p>23. Ad paragraph 15: as stated before, Platreef and MIACC share the common goal of making sure that the consultation process is legitimate, in accordance with the relevant legislation. Platreef is, furthermore, committed to ensuring meaningful participation by the affected communities in the economic benefits flowing from the proposed project. Your statements that Platreef "is purporting" to act in the interests of the community suggests a level of deceit on the part of our client, which is denied. This approach adds nothing to the relationship between our respective clients.</p>
<p>16. As it is now becoming impossible to properly advise our client of their rights we call on your client to provide us with the requested documentation by close of business on Friday 12 July 2013, and further provide us with a written undertaking that they will continue to keep us apprised of on-going developments</p>	<p>Lawyers for Human Rights</p>	<p>10/07/2013</p>	<p>Letter</p>	<p>Noted.</p>

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related to their operations in Mokopane including notice of consultations, written proposals and minutes of meetings with our clients.				
17.Should we fail to receive same, we hold instructions to seek the necessary relief from court. Given your client’s undertakings of good faith, we trust it will not be necessary to do so.	Lawyers for Human Rights	10/07/2013	Letter	24. Ad paragraph 17: our client denies any suggestion that it has infringed on any of your clients' rights. It is unclear to us on which basis you would be instituting any legal proceedings.
18. We look forward to your prompt response.	Lawyers for Human Rights	10/07/2013	Letter	Response provided as above.
RE: NOTIFICATION OF APPLICATIONS FOR ENVIRONMENTAL AUTHORISATIONS AND LICENCES	Lawyers for Human Rights	24/06/2013	Letter	Noted.
We are instructed by and represent the Mokopane Interested and Affected Committee (hereinafter “MIACC” or “our client”).	Lawyers for Human Rights	24/06/2013	Letter	Noted.
On 11 October 2012 a letter was addressed to Platreef Resources in which it was placed on record that MIACC sought to be registered as an interested and affected party.	Lawyers for Human Rights	24/06/2013	Letter	MIACC has been registered as requested.
As an interested and affected party MIACC wishes to place on record its rights to have been informed timeously that Digby Wells, appointed by Platreef Resources to undertake the Environmental and Social Impact Assessment for the Platreef Project, on the 21 <sup>st</sup> of June 2013 issued a Notice of Applications for Environmental Authorisations and Licences.	Lawyers for Human Rights	24/06/2013	Letter	MIACC were informed of the application on the 21 <sup>st</sup> of June by email with all the other Interested and Affected Parties (I&APs) registered on the I&AP database for the project I&APs
Our clients are concerned that they have not been informed about the Notice given all our past attempts on their behalf to acquire timeously notice and information from Platreef Resources of all proposals and applications that relate to the Platreef Project.	Lawyers for Human Rights	24/06/2013	Letter	See response above.

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Given the notification, kindly provide us with a copy of the Draft Scoping Report for both NEMA and the MPRDA.	Lawyers for Human Rights	24/06/2013	Letter	The Draft Scoping Document was provided on the 24 of June 2013.
In addition, kindly provide us with a copy of the social and Labour plan, which according to the Background information Document, attached to the notice of 21 <sup>st</sup> of June, has been developed and is awaiting approval.	Lawyers for Human Rights	24/06/2013	Letter	Please see the response provided above regarding access to the Social and Labour Plan.
We look forward to receipt of the requested information outlined in this letter by Wednesday 26 June 2013.	Lawyers for Human Rights	24/06/2013	Letter	The information such as the Draft Scoping Document was provided as requested.
Our client's rights are reserved.	Lawyers for Human Rights	24/06/2013	Letter	Noted.
We look forward to your soonest response.	Lawyers for Human Rights	24/06/2013	Letter	A response was provided.
<b>47 COMMENTS ON FINAL SCOPING REPORT</b>				
<b>It should be noted that many of these comments and responses relate to the draft scoping report and final scoping report and that these comments will have been addressed in the draft EIA/EMP to which this report is an attachment.</b>				
<b>Project Location and Description</b>				
The Final Scoping Report summary states that the proposed Platreef mining project will be situated 8 km away from Mokopane town which is very close to the town. WESSA would like to find out as to how will this proposed mine affect the growth or future expansion of the Mokopane town? How will the Mokopane town be affected by this proposed development since it is close to it?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	A Social Impact Assessment (SIA) forms part of the EIA Phase which will consider the impact of the proposed development on the Mokopane town.
The proposed area falls within the Mogalakwena Local Municipality and WESSA would like to find out if the Integrated Development Plan and Spatial Development Plan for this	Lemson Betha Environmental	10/10/2013	Email and letter	A SIA forms part of the EIA Phase. The SIA will make use of the IDP and SDF when assessing the impacts associated with the proposed

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
municipality has been referred to check if it allows development of this kind and if not, WESSA would therefore suggest that such tools be used in the informing of the decision by the decision makers.	Co-ordinator WESSA NORTHERN AREAS OFFICE			development.  The IDP and SDF do not constitute Alegal limitations on the activities that may be undertaken within the Municipality. A development of this kind is not prohibited and will be adjudicated on the basis of its merits.
<b>Prospecting Rights</b>				
The Final Scoping Report for this proposed mining states that the prospecting rights date back as far as 1998 and it has been renewed in 2006 and again to expire next year 2014 but according to the Mineral and Petroleum Resource Development Act 28 of 2002 section 18(4) states that; a prospecting right may be renewed once for a period not exceeding 3 years. As a result WESSA would like to know as to how this mentioned section of the law was adhered to by the developer?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	The original prospecting right was an old order right granted in terms of the Minerals Act, 1991. Old order prospecting rights were not subject to the same time limitations. Following the commencement of the MPRDA on 1 May 2004, old order rights needed to be converted and in this case this was completed by 2006. On this basis, the first period expired in 2011 and the renewal will expire in 2014.
<b>Water Issues</b>				
The Final Scoping Report acknowledges that Limpopo Province and Mokopane area are water scarce resource areas and WESSA would like the following questions attended to by the consultant	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Comment noted
Will the water be enough to operate the proposed mining activities and how will this affect the current water uses in the area in terms of the water availability and quality?	Lemson Betha Environmental	10/10/2013	Email and letter	Construction and Operational Phases:  Platreef is a member of the Joint Water Forum, which forms part of the Olifants River Water



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	Co-ordinator WESSA NORTHERN AREAS OFFICE			<p>Resource Development Project (ORWRDP) and the PRUISSSEN water forum. These forums are currently investigating water schemes within the Limpopo Province. The proposed project indicated that the water requirements will be approximately 16.2 ML per day. Platreef has identified alternative bulk water supplies, e.g. Flag Boshielo Dam, Rooiwal Waste Water treatment works and Seekoei Waste Water treatment works.</p> <p>Based on the hydrocensus study the water level behaviour in the project area does not indicate long term positive or negative trends and a healthy balance between local abstractions and annual recharge remains.</p> <p>Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.</p>
Has the Mogalakwena local municipality confirmed and approved that it will cope with the pressure brought by this proposed development in terms of service provision around water, sanitation and the infrastructural pressure as whole which might come with this proposed development?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	<p>Platreef is in constant communication with the Mogalakwena Local Municipality regarding the requirements and necessary services required for the proposed development.</p> <p>An accommodation and housing survey was conducted which indicated that Mokopane has the capacity to provide housing to just over 1 500 people, which will be sufficient for Platreef's requirements.</p>

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The report states that the proposed mining development is situated in the Mogalakwena river valley and flood plain and that there are 4 main watercourses draining across or adjacent with also 2 main wetland systems. Having quoted this, WESSA would then like to understand how will these water courses be affected by the proposed mining development? We would also like that the significance of these courses to the area including the people in that area and also the ecological support role played by the system be investigated more so as to get the true value of the system as compared to the mining activities.	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Detailed hydrological, aquatic ecology and wetland studies form part of the EIA Phase of the application process. These studies will (amongst other things) determine the health and ecological functionality and importance of the various systems. The significance of the potential impacts on the systems will also be determined as part of the specialist studies.
How will the mining activities affect the underground water which seems to be a very important water source in the area? How will both the underground water levels and quality be affected by this proposed development?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.
WESSA believes that Mogalakwena flood plain plays a major role in replenishing the underground water system and in that river system as a result, we see the development like the proposed one as a big threat to such a scarce resource in this area and therefore strongly object to the proposed development.	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.  Platreef intends to operate a zero discharge mine which will prevent impacts on the shallow aquifer system.
<b>Agriculture</b>				
The report states that the current land use on the proposed development site is subsistence farming and that the land is used as grazing lands. The report also states that the	Lemson Betha Environmental Co-ordinator	10/10/2013	Email and letter	Comment noted.

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Mogalakwena IDP says that agriculture is important to the rural villages within the municipal. Having highlighted the above, WESSA would like to see the below following comments attended to;	WESSA NORTHERN AREAS OFFICE			
WESSA would like to see the current land use kept as the best option for that area based on the fact that people are currently benefiting from the land and subsistence farming form part of their livelihood and culture.	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	The SIA considered the current land uses and recognises that (1) a large proportion of the site-specific study area is currently used for purposes other than mining, and (2) that the proposed project will result in economic displacement (where people lose access to cultivated land or other livelihood resources) and to a lesser degree physical displacement (where people or households have to be moved to a different location to make way for project infrastructure, or due to considerable risk to personal safety). Platreef intends enter into a surface lease agreements with all community members who has grazing or ploughing land, these agreements will see that affected individuals are compensated.  Platreef is also investigating the possibility of providing land-for-land.
What criteria is used in attaching value to the subsistence farming being practised in the area as compared to the proposed mining and will that be done in a manner which does not undermine the current land use?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Platreef has obtained independent valuations for the land under the guidance of the Department of Rural Development and Land Reform (DRDLR). An agricultural survey has also been conducted to identify the field owners and establish the extent of the subsistence farming.

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If this proposed mining project is approved, where will the livestock which currently graze on the proposed site graze and how will the farming needs of the local people practising subsistence farming there be met?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Platreef is investigating the possibility of providing land-for-land to provide for these farming and grazing needs.
<b>Socio-Economic</b>				
The report hints that the proposed mining will bring employment opportunities to the area, inject cash into the local economy and increase opportunities for local supplies of goods and services. WESSA therefore sees these comments vague as long as the below comments are not addressed.	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	Comment noted.
How much in total will be injected to the local economy to prove that this will be a boost to that economy? Will the returns generated by the proposed mining be invested back to the area to produce a sustainable economy? Are the developer's residents of that area to prove that they have a strong link to the area which will then result in them injecting cash to the local economy and if you can explain further as to how will cash be injected into the local economy?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	<u>B-BBEE</u> Legislation requires Platreef to have a 26% HDSA shareholding and Platreef has decided to set up broad-based communities trust and an employees' trust which will satisfy the HDSA ownership requirements.  The Platreef B-BBEE proposal involves the formation of a B-BBEE Company (Special Purpose Vehicle) that will own 26% of the shares in the Platreef Mine. The B-BBEE Company ownership is planned so that 35% is held in trust for the host communities, 8% is held in trust for the Women and Children in the host communities, 8% is held in trust for the A – C

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				<p>band employees of Platreef and 49% is retained by Ivanhoe Mines and partners for vendor finance purposes. Through the community trust, the community members may apply to benefit their causes, projects or other initiatives with the funds/dividends that the trust will receive. Platreef does not intend to keep the 49% shares in the BEE Company as this is a merely and interim practical arrangement to cover the financial commitments of the BEE Company in the Platreef project.</p> <p><u>SLP</u></p> <p>The SLP has budgeted a total of R160million for the first five years alone with R110 million of the total budget to be used for the implementation of the Local Economic Development (LED) projects.</p> <p><u>Economic Development</u></p> <p>Platreef recognises the importance of encouraging local procurement in their projects' supply chain and has recently launched an Enterprise Development (ED) programme for the Platreef project. The purpose of this programme is to identify, train and support local business owners to be ready to supply products and services to the project as well as to other customers. To start with, six local businesses were recently earmarked in consultation with</p>

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				specialist a consultant and will receive training and support in the foreseeable future. The ED budget for 2013 and 2014 alone is R32 million.
<p>As far as employment is concerned, how many people in total will be employed by this proposed mining development? How many permanent positions and temporary positions will come with the proposed development? Do the local people have the required skills to be employable by this proposed development and how is it going to be monitored that the local people get the promised employment? Is there a strategy in place to train the local people to take up the job positions which will come with the proposed development?</p>	<p>Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE</p>	<p>10/10/2013</p>	<p>Email and letter</p>	<p>It is anticipated that approximately 10 000 direct and indirect employment opportunities be created during the construction and production phases of the proposed project. Platreef intends to build a MQA accredited training facility on the premises of the Mine to deliver accredited mining and engineering skills programmes, full qualifications and learnerships. The training centre will be used for core technical training interventions for employees of the Mine and the plants as well as to develop the talent pool for the Mine and plant by delivering core technical training programmes to the people from the community. Platreef is planning four labour centres, situated within the four Mokopane Community Centres, which will enable the community members to register as job seekers, to be considered for employment on the project and also to be considered for other interventions.</p> <p>A Skills Audit was undertaken in conjunction with the Department of Labour as part of their Employment Service of South Africa (ESSA) initiative, to determine the skills available in the study area. This register will be used to complete an analysis on the skills base of the area in order</p>

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				<p>to focus the skills development requirements in future.</p> <p>Platreef currently has a strategy in place to ensure that the local people are trained for the relevant jobs which will come up with the development and as outlined in the SLP, R45million will be provided for Human Resources and Skills Development. Platreef has budgeted R24million for skills development within the surrounding communities.</p> <p>Learnerships for specific core skills will be offered which include engineering, boiler making and underground mining. R3.4 million will be invested over the first 5 years. Platreef will be implementing a bursary programme and has already extended invitations for three applicants (from the local communities) for industry-related studies for sponsorship in 2014.</p> <p>Adult Basic Education Training (ABET) for the community will be undertaken by an EDPT SETA accredited training provider in order for the learners to qualify with recognised portable qualifications. The training will be conducted in the training facilities to be provided by the mine in community centres to be erected. It is planned that at least 450 individuals will be trained at a cost of R3.6 million over the first 5 years.</p>
In increase opportunities for the local supplies and goods, how	Lemson Betha	10/10/2013	Email and	Platreef has a transformation strategy which will

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<p>will that be done and what criteria will be used to make sure that opportunities are increased? Has a survey been done to check if the services needed by the proposed development are available in that area?</p>	<p>Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE</p>		<p>letter</p>	<p>increase opportunities for HDSA suppliers as well programmes to build SMME capacity.</p> <p>The SLP addresses the issue of local supply and the commitment has been made to source goods and services locally as far as possible. Platreef has a preferential procurement policy for HDSA suppliers, and had created a database listing detailing all the HDSA service providers on the area. This database is continually being updated.</p> <p>In terms of the Enterprise Development (ED) programme, six SMMEs have been identified thus far and Platreef is assisting in the turn-around and development of these SMMEs. Platreef has already started investing cash and other resources into two of these projects. The ED spend for 2013 is R12 million with the amount of R20 million budgeted for 2014.</p> <p>The SLP has a planned budget of R160 million for the first five years of construction.</p>
<p>The report states that the proposed mining will give the communities skills required to remain economically viable and successful after mine closure. WESSA would like to find out as to what kind of skills would those be and how many people will be trained?</p>	<p>Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE</p>	<p>10/10/2013</p>	<p>Email and letter</p>	<p>Platreef, through its Social and Labour Plan (SLP) will be investing in the skills development of selected individuals in the communities. The SLP deals with the interventions planned for the next 5 years, after the acquisition of a mining right. Platreef is planning to provide the following interventions in the first SLP cycle:</p> <ul style="list-style-type: none"> <li>• Engineering Learnerships (27 people)</li> </ul>



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				<ul style="list-style-type: none"> <li>• Non-core technical skills in construction (390 interventions)</li> <li>• Core skills (2425 persons)</li> <li>• Bursaries for University Degree (10 interventions)</li> <li>• Scholarship (390 interventions)</li> <li>• Adult Basic Education and Training (ABET) (450 interventions)</li> </ul> <p>The above interventions will kick start the skills development initiative of Platreef in the communities. The second SLP cycle interventions will only be planned at the appropriate time in the future.</p> <p>Learnerships for specific core skills will be offered which include engineering, boiler making and underground mining. R3.4 million will be invested over the first 5 years.</p> <p>Over the next 5 years, Platreef will invest finance and effort into developing the non-core technical skills of the communities. These include welding, brick-laying, carpentry, plumbing, plastering, tiling and household electrical installations. The amount of 390 opportunities have been identified for non-core technical portable skills, with the total investment in these non-core technical portable skills being R4.8 million for the first 5 years.</p> <p>Non-core technical skills training will be made available through the mine training facilities within</p>

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				<p>the communities or, where facilities are unavailable at the mine, the training will be conducted at accredited training providers within the area.</p> <p>In addition the following core technical skills will be developed in the communities: First Aid Level 1 and Level 2; Occupational Health and Safety Rep.; Gas Detection; Basic Engineering; Basic Mineral Processing; Basic Fire Fighting; Dover Testing; UV Operator; LHD Operator; and Forklift Operator. A total of 2 425 individuals will be trained in the abovementioned core technical skills. This investment is worth R3.2 million over the first 5 years.</p> <p>Platreef will be implementing a bursary programme and has already extended invitations for three applicants (from the local communities) for industry-related studies for sponsorship in 2014.</p> <p>Adult Basic Education Training (ABET) for the community will be undertaken by an EDPT SETA accredited training provider in order for the learners to qualify with recognised portable qualifications. The training will be conducted in the training facilities to be provided by the mine in community centres to be erected. At least 450 individuals will be trained at a cost of R3.6 million over the first 5 years.</p>

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<b>Traffic and Roads</b>				
The report states that N1, N11, R101 and R518 are close to the site of the proposed mining development as a result WESSA would like to find out how traffic flow in these major highways and roads will be affected? The development of this nature normally comes with heavy trucks and what pressure will these add to the existing roads?	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	A Traffic Impact Assessment forms part of the EIA Phase. Platreef is investigating alternative routes to access the project area, as well as the feasibility of upgrading local roads.
<b>Alternative</b>				
WESSA would like to see all the other alternatives explored as much as the preferred one and that alternatives be explored as to the definition given to the 2010 EIA regulations section 1 which defines alternatives as different means of meeting the general purpose and requirements of the activity, which may include alternatives to:  (a) The property on which or location where it is proposed to undertake the activity  (b) The type of activity to be undertaken  (c) The design or layout of the activity  (d) The technology to be used in the activity  (e) The operational aspects of the activity; and  (f) The option of not implementing the activity	Lemson Betha Environmental Co-ordinator WESSA NORTHERN AREAS OFFICE	10/10/2013	Email and letter	These comments are on the final Scoping report, the function of which is to preliminary identify the potential alternative land uses and technologies and subsequently determine the scope of work for the ESIA. Alternatives will be investigated during the EIA Phase and included in the EIA report.
Having highlighted all the above comments WESSA therefore strongly objects the proposed mining development.	Lemson Betha Environmental Co-ordinator WESSA	10/10/2013	Email and letter	Comment noted.

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	NORTHERN AREAS OFFICE			
<b>MIACC SUBMISSIONS Final Scoping Report for the Proposed Platreef Mining Project for Public Review (MPRDA)</b>				
<b>Introduction</b>				
These submissions are made on behalf of the Mokopane Interested and Affected Community Committee (“MIACC” Or “our client”), a community organisation whose members are affected by Platreef Resources (Pty) Ltd prospecting and future mining activities in the Mokopane area. MIACC is a voluntary association comprised of some few hundred households from the villages of Tshamahansi, Ka-Gubudi, Ga-Magongoa and; Mzombane, in and around the Mokopane area, all of which are directly affected by Platreef’s prospecting and proposed mining project.	Lawyers For Human Rights (LHR) On Behalf of Mokopane Interested and Affected Community Committee; (MIACC”)	10/10/2013	Email and letter	Comment noted.
MIACC gave notice to Platreef and the DMR on 11 October 2012 that it wished to be recorded as an interested and affected party.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted. MIACC and LHR have been registered as I&APs.
MIACC is represented by Lawyers for Human Rights (“LHR”), a non---governmental, non--- profit organisation which, since its establishment in 1979, strives to protect, enforce and uphold human rights.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<b>Scope of MIACC’s Submissions</b>				
MIACC’s comments on the final scoping report are grounded in the Constitution, the National Environmental Management Act 107 of 1998 (“NEMA”), the Mineral and Petroleum Resources Development Act 28 of 2002 (“MPRDA”) and the relevant regulations thereto. As is prescribed by the MPRDA and the EIA	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.

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regulations under NEMA, a scoping report must contain all the information that is necessary for a proper understanding of the nature of the issues identified during scoping, including but not limited to:				
1. A description of the environment that may be affected by the activity; and the manner in which activity may be affected by the environment;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
2. A description of environmental issues and potential impacts, including cumulative impacts, that have been identified;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
3. A description of tasks that will be undertaken as part of the environmental impact assessment process, including any specialist reports or specialised processes;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
4. A description of the existing status of the environment prior to the mining operation; and	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
5. Identification and description of the anticipated environmental, social and cultural impacts (including cumulative effects where applicable).	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
This submission seeks to ensure that the environmental impact assessment process finds balance and integration between socio---economic development and environmental protection as outlined in the aforementioned legislation. To this end, these submissions analyse and highlight; concerns where the final scoping report fails to comply with national environmental and mining laws which are designed to enforce this balance. These submissions aim to ensure that our client’s rights to just administrative action is respected, as well as its environmental, socio-economic and socio-cultural rights all of which are	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.

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connected and can only exist when all are adequately upheld and respected.				
These submissions first raise some general concerns and thereafter address impacts. The conclusion of this analysis is; that the final scoping report is lacking material information as required by the law. In addition, several concerns that MIACC have previously raised concerning the purported consultation process are not adequately addressed in the final scoping report.	LHR on behalf of MIACC	10/10/2013	Email and letter	
<b>Appropriate Zoning</b>				
The Final Scoping Report does not make any mention of how the vicinity of the proposed mining operations are presently zoned. It further does not state whether it is necessary to, or it intends taking any steps for the area to be re-zoned appropriately in keeping with the relevant provincial legislation and by laws, as required in the Maccs and judgment.1	LHR on behalf of MIACC	10/10/2013	Email and letter	Within the framework of current applicable legislation within the area, no rezoning is required. The only alternative currently at the disposal of Platreef will be to submit an application to the Provincial Government in terms of Proclamation No 293 of 1962. Over and above the fact that the applicability of the aforesaid proclamation remains questionable, any application submitted for land use rights to Provincial Government for its consideration will, in view of the judgement of <u>the Constitutional Court in the matter of the City of Johannesburg Metropolitan Municipality vs Gauteng Development Tribunal and other 2010 (6) SA 182 (CC)</u> , be unconstitutional as Provinces no longer enjoy jurisdiction or the constitutional competency to decide on the Municipal Planning matters. The only legal instrument designed to give Municipalities powers to decide on Municipal

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				<p>Planning matters, it the Ordinance which, for the reasons set out above, does not apply within the erstwhile self-governing territories.</p> <p>Due to the fact that mining activities (in the absence of a correct zoning) will not be unlawful, the view is that any application lodged at this point in time for land use rights will be an exercise in futility. It is however deemed necessary to note that, at this point in time, it is anticipated that the new Spatial Planning and Land Use Management Act, Act 16 of 2013, will come into operation on 1 April 2014 (this act had already been assented to by the State President). In terms of Section 24 (1) of that Act, all Municipalities in our country will be under a legal obligation to prepare land use schemes covering the entire jurisdictional area of the Municipality. Upon the coming into operation of that Act, and the compilation of a land use scheme by the applicable Municipality, it must be ensured that the land uses designated for the relevant area, also include proposed mining activities. If a scheme is proclaimed without the property having been zoned for mining activities, a rezoning/township establishment/consent use application can, at that point in time be considered.</p>
<p><b>3.2. Customary Law, Traditional Leadership, and Communal Land Ownership</b></p>				
<p>The Final Scoping Report states: 'The project is proposed to be</p>	<p>LHR on behalf of</p>	<p>10/10/2013</p>	<p>Email and</p>	<p>This comment is noted and will assist Digby</p>

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<p>situated on the following farms: Turfspruit 241 Macalaskop 243 KR and Rietfontein 2 KS</p> <p><i>The abovementioned farms are owned by the Government of the Republic of South Africa but are identified as tribal land. This means that the Mokopane Traditional authority is the custodian of the land on behalf of the State, and has jurisdiction over the land, including the allocation of land for farming and residential purposes...’2</i></p> <p><i>’Individuals and households around the project area are not legal title deed holders or owners of their plots of land but have been given permission by either the village headman the chief.’3</i></p>	MIACC		letter	<p>Wells in reformulating this description of the socio-economic conditions of the affected persons in the draft EIA. The rights exercised by individuals and households under the Interim Protection of Informal Land Rights Act, 1996 (IPILRA) will be specifically acknowledged. In terms of land ownership the description has been amended to read.</p>
<p>Platreef’s representation of the ownership of the affected communal land and the authority of the Mokopane Traditional Authority in the area to enter into agreements about the communal land On behalf of the individuals is questionable. It is submitted that individuals have rights in respect of land ownership and use – they are the lawful occupiers of the land and the land is held in trust for the usufruct of these individuals and their heirs. The scoping report needs to correctly identify and Delineate this issue.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p><i>”The abovementioned farms are owned by the Government of the Republic of South Africa and are held in trust by the Minister of Rural Development and Land Reform for the Mokopane community. Individuals and households in the area occupy and utilise the land on the basis of informal rights acquired under circumstances contemplated in the Interim Protection of Informal Land Rights Act, 1996 (IPILRA).”</i></p>
<p>This also applies to Platreef’s consequent obligations to individual land-owners when entering into public participation and consultation, and when entering into agreements in these areas, mentioned in more detail below.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	
<p><b>3.3. Traditional Authorities, Ethnicity and Language</b></p>				
<p>The final scoping report states in its description of the status of the cultural environment that may be affected:</p> <p><i>1 The proposed project area is located on and owned by the Republic of South Africa but administered by the traditional authority in the area, namely the Mokopane Traditional Authority. The chief or Kgoshi of the Traditional Authority is Chief Kekana with jurisdiction over 17 villages.’4</i></p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>It is noted that the traditional authority does not legally exercise administrative and governmental powers in relation to the community, as mentioned by the Constitutional Court in Certification of the Constitution of the Republic of South Africa, 1996 1996 (4) SA 744 (CC). However, the traditional authority exercises</p>



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<p>The scoping report demonstrates a lack of understanding of the socio---cultural composition of the area of Mokopane and the politics therein. It quite importantly fails to acknowledge and describe the chieftaincy dispute in the area (which arose as a result of the death of Chief Alfred Kekana in 2000, whereupon the government formally recognized his uncle, Vaaltyn Kekana (A) as chief rather than his son, also Vaaltyn Kekana (B)). This acknowledgement and recognition is important to earmark at the scoping phase to ensure that the relevant authorities are aware of the dispute and the consequent effect it could have and has had on adequate public participation and consultation.</p>				<p>customary, cultural and ceremonial powers.</p> <p>The government-recognised traditional authority represents an important channel of communication to facilitate access to the affected communities for purposes of broad-based, meaningful consultation with the affected communities. This does not mean that consultation has only taken place, or will only take, with the traditional authority. Platreef recognises the need to consult with all interested and affected parties, including individual community members (especially those whose land rights may be directly affected by the proposed activities) and civic organisations representing the views and interests of various groups within the communities</p> <p>It is not within the scope of any EIA to establish the legitimacy of the Kgoshi and/or of a traditional authority. Platreef and its consultants cannot become embroiled in a succession dispute over which Platreef and the consultants have no control. The standpoint is that Platreef and their consultants will engage with the whole community and all relevant stake holders, of which the government recognised chief is one. Through public meetings and opportunities to comment on documentation other members of</p>

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				the communities and the public at large can engage in the public participation process on the same basis, and to the same extent, as the traditional authority.
Recent interpretation of South African customary law indicates that current systems of norms by which a community chose to live should decide who can make decisions on behalf of a community. In customary law the legitimacy of a chief is further, a direct determinant of the legitimacy of his decisions.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
The scoping report however fails to adequately justify, in terms of customary law, the legitimacy of Vaaltyn Kekana A as well as the authority on which Vaaltyn Kekana A speaks on behalf and purports to make binding decisions on behalf of communal residents, irrespectively of the chief they support.	LHR on behalf of MIACC	10/10/2013	Email and letter	The Scoping report does not deal with any agreements made with, or decisions taken by, any outside parties. It is also not the function of the Scoping report to question or justify the legitimacy of the chief and his decisions.
There are many residents in the area who do not recognize Vaaltyn A as the legitimate heir and therefor do not consider themselves bound by his decision. This has been aggravated by the manner in which the process of negotiation between Platreef and Vaaltyn A has unfolded.	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef will engage with all stakeholders. While Platreef has been gaining access to an important sector of the communities through communications with the government-recognised Kgoshi, Platreef recognises the need to consult with all individuals in the communities. Platreef does not intend to get embroiled in, or to influence, leadership disputes within the communities.
Most importantly, MIACC is concerned about the manner in which the contention for legitimacy between the Two candidates has paved the way for Platreef to use tactics that further divide the royal family and their constituencies as well as the abuse of Vaaltyn Kekana A as an extension of the interests of the mine, without adequate reflection of the changing needs and life	LHR on behalf of MIACC	10/10/2013	Email and letter	It is not the function of the Scoping report to question or justify the legitimacy of the chief and his decisions. This comment raises allegations which fall outside of the scope of this document. While Platreef has been gaining access to an

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patterns of the affected community. The outcome of this consolidation may have been abuse of power by the Vaaltyn Kekana A, against his own people and interests.				important sector of the communities through communications with the government-recognised Kgoshi, Platreef recognises the need to consult with all individuals in the communities. Platreef does not intend to get embroiled in, or to influence, leadership disputes within the communities.
<b>In justifying the authority of customary law, the scoping report must describe in detail</b>				
1. The legitimacy in terms of customary law of Vaaltyn Kekana A and authority to enter into agreements on behalf of the community, including the election of Vaaltyn Kekana A in terms of the Traditional Leadership and Government Framework Act.	LHR on behalf of MIACC	10/10/2013	Email and letter	The Scoping report does not make reference to any agreements entered into by Kgoshi Vaaltyn Kekana A on behalf of the community.  It is also not the function of the Scoping report to question or justify the legitimacy of the chief and his decisions.
2. How these agreements purportedly entered into with Vaaltyn Kekana A are justified by customary law, the manner in which these are addressed by the chief's advisors, the council of headmen, the public of assembly and how in terms of the norms and practices in Mokopane, customary structures may accept or reject a proposal by the chief;	LHR on behalf of MIACC	10/10/2013	Email and letter	The Scoping report does not make reference to any agreements entered into by Kgoshi Vaaltyn Kekana A on behalf of the community.  It is also not the function of the Scoping report to question or justify the legitimacy of the chief and his decisions.
3. How does the mine intend to deal with individuals within the community who do not recognize Vaaltyn A as the legitimate heir and therefor do not consider themselves bound by his decisions?	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef and its consultant consult with all stakeholders. An open and transparent consultation process has been followed.
<b>In identifying that the area is administered by traditional authorities, the following must also be mentioned</b>				

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1. that any relocation (if relevant) will have an effect on communities that will fall under a new chief as a consequence of their relocation;	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
2. that relocation will affect the future of the Kekana Chieftaincy;	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
3. that potential conflicts could arise between different chieftaincies as a result of the relocation; and	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
4. Who and /or which chieftaincy is entitled to land claims that have been or will be instituted by people who are relocated.	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<b>Insofar as Ethnicity and Language is concerned the Scoping report reads</b>				
<p><i>'The dominant language spoken within the proposed project area as recorded in 2001 was Sepedi followed by Xitsonga (Statistics South Africa, 2001). This also shows that the dominant ethnic group within these areas is Pedi and secondly Tsonga. From discussions held with stakeholders it was determined that the Mokopane Traditional Authority is from the Pedi ethnic group and, therefore, the majority of people living within the project area are also Pedi.'</i></p> <p>This is contrary to vast existing literature and interviews that suggest that the chiefdom of Mokopane is of northern Ndebele origin and that Ndebele, while not an official South African language, together with the two mentioned in the final scoping report, are the primary languages spoken in the area.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Comment noted.</p> <p>The majority of the people in the communities are Northern Ndebele and the most commonly used language is Sepedi. The language of instruction in the local schools is Sepedi.</p>
It is important to identify the correct ethnic and language groupings in the area– not least to ensure that public participation is in a language that individuals understand- to <i>inter alia</i> ensure that Platreef is aware of the genealogy that will be affected by their proposed mining operations.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<b>It is particularly important to identify the correct Ethnic and Language groups when one considers</b>				

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1. the fact that historically the Mokopane chiefdom is of northern Ndebele origin;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
2. the associations the aforementioned unspecified ethnic groups historically have towards landscapes, archaeological remains, rivers, graves and monuments that appear to be baldly incorporated into the Pedi domain;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
3. that each ethnic group practices certain traditions and customs specific only to that group;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
4. that ethnic groups may only relocate (some relocation being foreseeable as part of Platreef's proposed project) into the same ethnic groups; and	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
5. most importantly, that language goes to the core of human dignity – it being critical that anyone who seeks to benefit from the area know what language the people most affected by it speak.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
In order to adequately identify and describe the above impacts on the cultural climate in Mokopane and the impacts of relocation given the various ethnic and language differences it is concluded that a specialist study will have to be undertaken.	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<b>3.4. Precaution and Risk Aversion</b>				
MIACC is not categorically opposed to the prospecting and future mining activities. However, they are intolerant towards environmental and social impacts, where such impacts could and can be avoided. MIACC is also intolerant to a situation in which they will be placed in an inferior socio economic, environmental and social position than that which existed prior to Platreef's prospecting and future proposed mining activities.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
This submission seeks to ensure that the appropriate precautions are taken with the purpose of ensuring that the environment and the member community are not exposed to	LHR on behalf of MIACC	10/10/2013	Email and letter	Agreed. This is the ultimate goal of the EIA/EMP report and the project as a whole.

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avoidable impacts which may leave them worse-off.				
To this end, it is observed that there is a general lack of independent review and methodology in the final scoping report which is necessary to identify at the scoping phase. For instance, the final scoping report has identified a number of possible impacts but fails, as will be described below in detail, to describe how impacts will be evaluated and independently reviewed - which is necessary to adequately identify alternatives to the proposed project, to identify mitigation measures and what can be maximized for the benefit of the local community.	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>The Scoping report was prepared by an independent consultant.</p> <p>The aim of the Scoping report is to do a preliminary assessment of the potential impacts. The EIA Phase of the project will further identify the impacts and propose mitigation to manage the negative impacts and enhance the positive impacts.</p> <p>Chapter 10 of the NEMA Scoping report elaborates on the impact assessment methodology and how impacts will be evaluated.</p>
It is also necessary that alternatives to the proposed mine are further explored, including the property on which or location where the mine is proposed to be, the type of activity to be undertaken, the design and layout of the activity, the technology to be used, the operational aspects of the mine and the option of not implementing the plan to mine.	LHR on behalf of MIACC	10/10/2013	Email and letter	These comments are on the Scoping report, the function of which is to preliminarily identify the potential alternative land uses and technologies and subsequently determine the scope of work for the EIA. Alternatives will be investigated during the EIA Phase.
<b>3.5. Cumulative Impacts</b>				
<p>The final scoping report reads:7</p> <p><i>'During the EIA phase cumulative impacts will be assessed in order to determine how the proposed project will contribute to the already existing and potential future environmental impacts occurring in the area.'</i> The final scoping report merely reiterates the requirements of the EIA and MPRDA regulations relating to</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>The following cumulative impacts on the environment have been considered:</p> <ul style="list-style-type: none"> <li>• Topography and Visual Aspects</li> <li>• Biodiversity (Flora and Fauna)</li> <li>• Impacts on Soil</li> <li>• Aquatic Environment and Wetlands</li> </ul>

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cumulative impacts and describes its methodology in identifying cumulative impacts in the EIA phase. However, it fails to actually identify the foreseeable cumulative impacts themselves, and consequently identify relevant specialist studies. It is our client's submission that this is not in keeping with the EIA and MPRDA regulations and that the final scoping report this falls short in this regard.				<ul style="list-style-type: none"> <li>• Impacts on Surface Water</li> <li>• Ambient Noise Levels</li> <li>• Social Environment</li> </ul>
In conclusion, cumulative impacts must properly be identified in the scoping report, particularly in relation to other proposed and existing mines (and other development pressures) in the area and the combined long-term impacts that these cumulative impacts will have on the environment and socio-economic position of the affected community. The cumulative impacts must also be structured that the sense of place for people who identify with the place remains.	LHR on behalf of MIACC	10/10/2013	Email and letter	
<b>The following considerations should be investigated</b>				
1. The proximity of similar projects geographically and temporary	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
2. The probability of action affecting the same social and environmental system	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
3. Whether the effects of other mines (or developments) are similar to the proposed project.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
4. The cumulative effects of the proposed project on bordering neighbouring properties with regard to the reduction in value, aesthetic unacceptability, quality of life and secondary degradation.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
In terms of the potential environmental impacts of the mine, the cumulative impacts must be analysed in terms of the natural ecological boundaries rather than man-made boundaries and must be investigated with specific regard to the point that the resources are no longer affected.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted

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<b>3.6. Constitutional Requirement to Consult with and Engage Landowners, Lawful Occupiers, Relevant Stakeholders and I&amp;APs</b>				
<p>The Final Scoping report states: <i>'Public Participation Process (PPP) – Allows Interested and Affected Parties (I&amp;APs) to participate in the project design, planning and decision-making phases by providing an opportunity to raise issues, comments and concerns with regards to the proposed project. The issues that have been identified will be used to inform and guide specialist environmental and social studies during the EIA phase.'</i> 9 p.2</p> <p>The Scoping Report indicates that Platreef, or its consultants, are of the view that the community and identified interested and affected parties have been consulted as required. The MIACC respectfully disagrees that Platreef, through its consultants or otherwise, has been properly consulted.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Comment noted.</p> <p>MIACC is one of the stakeholders and has been consulted and MIACC may consider the consultation to be inadequate. Platreef has however widely consulted with all their stakeholders directly through mass meetings and stakeholder engagement forums. Several of these engagement meetings had been attended by Government officials such as the Department of Land Reform who has confirmed that Platreef's consultation processes were adequate.</p> <p>The NEMA EIA Regulations and the MPRDA requirements in terms of public consultation have been followed during the engagement process.</p> <p>Documents were made available at the following venues:</p> <ul style="list-style-type: none"> <li>• Mokopane Public library;</li> <li>• Mahwelereng Public Library;</li> <li>• Platreef community liaison offices;</li> <li>• Affected villages headmen;</li> <li>• Digby Wells website www.digbywells.com; and</li> <li>• I&amp;APs were able to request a compact disc (CD) copy of the report.</li> </ul>
<p>As a point of departure, the MPRDA's preamble recognises: <i>'the need to promote local and rural development and the social upliftment of communities affected by mining,'</i> and is <i>'committed</i></p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>During all public meetings translations have been provided in Sepedi and Tsonga to accommodate</p>



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<p><i>to eradicating all forms of discriminatory practices in the mineral and petroleum industries.'</i></p> <p>That the MPRDA itself recognises the unequal power dynamic and accordingly negotiation ability between mining companies, and rural communities who have been (and continue to be) unfairly discriminated against is crucial to understanding and conducting meaningful public participation processes within communities.</p>				low levels of literacy etc. As far as possible, the presentation has used more visual aids.
<p>There is necessity of recognising, understanding, and dealing appropriately with literacy, educational deficits and legal literacy amongst the rural community– placing an additional obligation on the mining company and their consultants, to capacitate the affected community to fully understand the nature of the consultative process as well as the substance of the consultations –in order for any semblance of meaningful public participation to be achieved.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<p>The MPRDA requires a mining right applicant to notify and consult with the landowners and lawful occupiers of the land in question is trite. It is crucial that recognition be given to each individual community member as a landowner in traditional law, and hence the right of each individual to meaningful consultation cannot be underestimated.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<p>The MPRDA Regulations do not prescribe the consultation process that must be followed, though section 37 of the MPRDA does require that the Environmental Management Principles set out in NEMA be applied in interpreting the MPRDA in relation to any prospecting or mining right.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<p><b>We highlight the following principles from Section 2(4) of NEMA</b></p>				
<p><i>'(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective</i></p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Comment noted.</p> <p>Taking cognisance of this comment, other avenues of sharing information and obtaining</p>

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<i>participation, and participation by vulnerable and disadvantaged persons must be ensured.</i>				feedback will be used during the follow up consultation meetings. Such avenues include: <ul style="list-style-type: none"> <li>• Posters;</li> <li>• A non-technical executive summary will be made available after the final EIA report; and</li> <li>• Pamphlets.</li> </ul>
<i>g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.</i>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<i>h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.'</i>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
It is accordingly good practice to follow the process prescribed in the NEMA EIA Regulations and that at the very least, the minimum requirements for proper public participation as prescribed by the EIA Regulations be followed.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
Additionally, the courts have interpreted the rights and interested and affected parties entitlement to participate in and be consulted in respect of new prospecting and mining applications, as more than a mere formal process. It requires a genuine and effective engagement of minds between the consulting and the consulted parties'. In addition both sufficient time and information must be provided to the consulted (affected) party in order for him or her to consider the issue effectively.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
The Constitutional Court, in a case dealing specifically with prospecting rights, highlighted these minimum requirements are for consultation: Firstly the applicant has to engage with the	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.

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relevant landowners and/or lawful occupiers in good faith. The landowner or lawful occupier should, during the consultation process, be provided with the necessary information on all intended activities so as to enable him or her to make an informed decision as to whether or not to make use of the internal procedures (objection and appeal) if the application is approved, as well as whether or not to take the administrative action concerned on review.				
The requirement that the landowner or occupier be provided sufficient detail on the proposed mining activities is to enable these directly affected and interested parties to assess the impact of such activities and on their use and enjoyment of the land. Anything short of these requirements, does not meet the requirements of the consultation process envisaged by the MPRDA.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<b>MIACC and LHR have a number of deep concerns surrounding the purported public participation process to date, and as represented in the Final Scoping Report including</b>				
1. The language used for the PPP, as well as the language used in available documents;	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
2. The (lack of) availability of relevant, necessary, required and requested documents and the apparent failure of Platreef or their consultants to address these concerns	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted. The alleged lack of availability of documents raises issues which fall beyond the scope of this Scoping report.
3. Platreef's misrepresentations of sufficient engagement for uplifting of the section 93 order	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted. The Section 93 order relates to Platreef's prospecting right and falls beyond the scope of this Scoping report.
<b>Language for the PPP</b>				

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As highlighted elsewhere in these submissions, the Scoping Report has failed to recognise Northern-Ndebele as one of the widely spoken languages in this area. No meetings have been held in Northern-Ndebele, nor have any of the documents which are made available, available in Northern-Ndebele.	LHR on behalf of MIACC	10/10/2013	Email and letter	A recent request has been made that part of the consultation be done in Northern Ndebele. During the EIA Phase consultation meetings, both Sepedi and Northern Ndebele translation will be done.
Where meetings are conducted in Isi-Pedi or Sotho, there are concerns that the translation provided at these meetings is inadequate, and frustrating any meaningful understanding of community members through the PPP. These numerous complaints are clearly reflected in the community comments attached to the Scoping Report. There can be no suggestion that the requirements of consultation envisaged by the MPRDA have been met where there interested and affected communities are effectively excluded from all PPP processes through language.	LHR on behalf of MIACC	10/10/2013	Email and letter	This statement is not true. Where there were issues around translators which were used this was addressed in subsequent meetings. I&APs were also welcome to ask for clarity on any aspect of the presentations which were made. In subsequent meetings local community members have been used to translate.  During the comprehensive PP process there have been no complaints or formal requests for the meetings to be conducted or the documents to be translated into North- Ndebele.
<b><i>Relevant, Necessary, Required and Requested Documents</i></b>				
The Scoping Report suggests that relevant documents are available with the tribal authorities, and headmen in particular areas, available on the consultant's website, and available at the offices of the community liaison officers in individual villages.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
It is wholly insufficient for documents to be provided to chiefs and headmen, this is a misrepresentation of their role as traditional leaders as the authoritative decision maker on behalf of 'subjects, and it fails to recognise as set out elsewhere that not all community members recognise the role of these chiefs or headmen. Each and every community member as an individual rights holder is entitled to access and receive all pertinent	LHR on behalf of MIACC	10/10/2013	Email and letter	The draft Scoping report and final Scoping report in addition to being placed with the headmen were also placed at the Mogalakwena Public Library in Mokopane and at the Mahwelereng Public Library, in the Mahwelereng Village as well as on the Digby Wells Website. Providing

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documents.				additional venues such as at the headmen of the affected villages and at the Platreef community liaison offices was an added measure to ensure that the documentation was widely available.  Digby Wells invited all I&APs to request copies of the document, if required, and only two such requests were received, these being from Mr Lekau Kekana and Mr Emile Honibal, and the documentation was provided.
The further response from the consultants (and from Platreef and its legal representatives to LHR) that all relevant information is available at the community liaison offices, is patently false. MIACC members have attempted to access documents at these offices repeatedly, and on occasion with the assistance of LHR, only to find such offices unmanned, or when officials are present to be denied access to requested documents.	LHR on behalf of MIACC	10/10/2013	Email and letter	The documentation was available to I&APs at the public libraries, on the Digby Wells website and on request from the Digby Wells offices.  The CLO officers were involved in and assisting with the preparations for the various public consultation meetings (over 60 meetings held to date) and therefore were unable to man the CLOs permanently.
In response to comments made by community members at the purported consultations, the consultant has advised that it did not make any hard copies of presentations available as it did not know what the attendance turnout for the meeting would be – this is an entirely inadequate response to a reasonable request for hard copies of presentations to attendees. Not making same available, especially on request, indicates a lack of good faith in conducting such consultations, in which community members have clearly stated that they require same to meaningfully engage.	LHR on behalf of MIACC	10/10/2013	Email and letter	Presentations presented at the public meetings were included into the appendices of the draft and final Scoping reports.  In future meetings a translated summary of the presentation will be made available.
While community members can access some relevant information on Digby Well’s website, this is wholly insufficient	LHR on behalf of MIACC	10/10/2013	Email and letter	For this reason hard copies of the Scoping reports were placed at the libraries, with the

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and prohibitive to the majority of indigent community members.				headmen and at the community liaison offices. The EIA report will be made available at the libraries, CLOs, the headmen as well as to the civic organisations.
The Scoping Report, and indeed the consultants do not adequately deal with the numerous comments reflected in the annexures, pertaining to MIACC's and LHR's direct requests to Platreef and their legal representatives, Webber Wentzel, for access to relevant and requested documents. The response from the consultants as depicted in the annexures, denotes that Platreef and its legal representatives will respond to LHR. This is the extent to which the consultants deal with the specific concern raised by community members that they feel unable to meaningfully participate in public consultations without the necessary and requested information available to them, in order to be properly appraised of potential impacts that will affect them directly. Despite this response from Platreef and its consultants, LHR has received no requested documents from Platreef either.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
LHR has made numerous written requests on MIACC's behalf, to Platreef and to their attorneys to access the following requested, necessary and relevant information: 1.The Mining Right Application; 2.The section 93 order; 3.The representations made by Platreef to the DMR for the lifting of the section93 Order; 4.The decision of the DMR to uplift the section 93 Order; 5.The detailed BBEEE proposal(and not merely the power point summary presented at community meetings); 6.The Social and Labour Plan; and 7. Invitations to, Agendas and Minutes of Community meetings.	LHR on behalf of MIACC	10/10/2013	Email and letter	The requests for information are addressed above in this issues table under the section dealing with legal letters.  Platreef has agreed that it will provide this documentation, subject to redaction of commercially sensitive information.
LHR has further sought meetings with Platreef, and thereafter with their legal representatives specifically in order to obtain this	LHR on behalf of	10/10/2013	Email and	MIACC's PAIA request did not comply with the

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requested information.18 The initial meeting LHR sought with Platreef came to naught, given Platreef’s attitude that it ought only be an informal ‘off the record’ meeting, during which Platreef officials refused to provide the requested information. The subsequent meeting between LHR and Webber Wentzel’s appeared to indicate the reasonableness of MIACC’s request for information and that at least some of the requested documents would be provided, but these requests have subsequently been refused. To date, Platreef has refused to provide requested relevant information to LHR. It reasons for doing so appear to range from it not being required to do so in terms of the MPRDA (in respect of the Mining Right Application and the detailed BBEEE proposal) to documents not being relevant to the interested and affected parties (in respect of the Social and Labour Plan, which Platreef through its lawyers advises is an undertaking between Platreef and DMR and is as such not relevant to the directly affected community members.)	MIACC		letter	relevant statutory provisions. Webber Wentzel’s response to the PAIA request did not constitute a refusal of the PAIA request on its merits, but merely pointed out the deficiencies in the request itself, which did not set out the information required under the relevant provisions of PAIA. This does not prohibit LHR from submitting a valid PAIA request. However, in light of Platreef’s decision to make available the documents listed on page 10, this issue is now a moot point
This obfuscation by Platreef has forced the MIACC to submit formal applications for the Mining Right Application and the Social and Labour Plan under the Promotion of Access to Information Act (PAIA).To date Platreef’s response to this PAIA request has been to refuse it on the basis that MIACC (representing communities in four of the eight directly affected villages), has not demonstrated that it is directly affected, identified what rights are impacted and further that it does not recognise MIACC without confirmation of its individual members. This is despite the fact that as set out above, MIACC gave notice to Platreef and the DMR on 11 October 2012 that it is an interested and affected party comprised of some few hundred households from the villages of Tshamahansi, Ka-Gubudi, Ga---Magongoa and Mzombane, all of which are directly affected villages.	LHR on behalf of MIACC	10/10/2013	Email and letter	MIACC’s PAIA request did not comply with the relevant statutory provisions. Webber Wentzel’s response to the PAIA request did not constitute a refusal of the PAIA request on its merits, but merely pointed out the deficiencies in the request itself, which did not set out the information required under the relevant provisions of PAIA. This does not prohibit LHR from submitting a valid PAIA request. However, in light of Platreef’s decision to make available the documents listed on page 10, this issue is now a moot point.
<b><i>Platreef’s (Mis)Representations of Sufficient Engagement for Uplifting of Section 93 Order</i></b>				
It appears that the DMR made an order in terms of section 93 of	LHR on behalf of	10/10/2013	Email and	The Section 93 order relates to Platreef’s

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<p>the MPRDA for Platreef to desist from continuing with its prospecting activities in certain areas based on lack of, or insufficient engagement with the affected community. DMR has subsequently uplifted this order, apparently on the basis that Platreef subsequently met its engagement requirements. This however remains opaque due to Platreef's refusal to provide the information requested pertaining to the section 93 order and its upliftment.</p>	<p>MIACC</p>		<p>letter</p>	<p>prospecting right and falls beyond the scope of this Scoping report.</p>
<p>Apart from correspondence addressed by LHR to Platreef / Webber Wentzel on this point, the final scoping report further highlights this concern of community members, as evidenced in Table 2 of the stakeholder comments. The responses to these comments from Digby Wells are equally obtuse, and do not meet the threshold of meaningful engagement, both through the refusal to provide the requested information and in vague verbal responses – on the very request for clarity on the section 93 order, Digby Well's response is:</p> <p><i>“On 4 June 2013, a meeting was held with the leaders of Mokopane to inform them that the DMR has lifted the section 93 [sic] of the MPRDA. The outcome and reasons were presented to those who attended the meeting. One of the points indicated in the section 93 lifting was that Platreef must continue to consult with the communities, thus engagements will continue”.<sup>21</sup></i></p> <p>It is manifest, and required on the authority of the Constitutional Court, that public consultation is not meaningful without all relevant documentation available to the affected community, in order for them to be able to properly engage from a position of all knowledge. Platreef has not engaged in any meaningful way with our clients about the impact of the intended mining operations on their community and their livelihoods. Platreef has accordingly failed to meet the necessary requirements to submit</p>	<p>LHR on behalf of MIACC</p>	<p>10/10/2013</p>	<p>Email and letter</p>	<p>The Section 93 order relates to Platreef's prospecting right and falls beyond the scope of this Scoping report.</p>



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a final scoping report.				
<b>Impacts</b>				
<p>There are a number of impacts that are identified in the final scoping report that need additional analysis to comply with the MPRDA and EIA Regulations. We expect that our client's comments below will define the scope of work for specialist environmental and social studies during the EIA phase to ensure the least possible impact on them.</p> <p>4.1. Archaeology and heritage:  <i>Graves: The final scoping report states: 'There are graves present within the boundaries of the project area, which will either need to be avoided or excavated. Relocation of graves has to be used as a last resort. It is also possible that some of the dwelling structures on the proposed project site are over 60 years old.'</i><sup>22</sup></p> <p>The proposal to relocate graves, even as a last resort, is probably one of the most controversial aspects of the final scoping report and it is essential that this is done with the utmost sensitivity, cultural and otherwise, and respect to the next of kin – which would therefore have to include a proper description of:                      1. The elected methods for deciding the age of the graves, 2. The elected methods for identifying which graves will be subject to relocation, 3. The elected methods for requesting permission from next of kin, and 4. The manner in which people will be consulted and when, in order to be properly and timeously availed of their rights, especially given the poor history grave relocation in the area all of which go to properly describing potential environmental, social and cultural impacts. Specialist studies will need to be undertaken by Platreef to ascertain who is buried where.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>A Heritage Impact Assessment form part of the EIA Phase and has been submitted to the SAHRA for comment. The comments received from SAHRA regarding the proposed relocation process will be incorporated into the process.</p> <p>With specific reference to burial grounds and graves, Digby Wells has recommended that:                      Potential impacts on the burial grounds may be avoided though the implementation of feasible mitigation measures related to project design and planning. The burial grounds may therefore be preserved <i>in situ</i> ensuring protection during development and the long-term. Project-related mitigation measures and site managements should be implemented to reduce the magnitude of the impacts</p>
<i>History:</i> The heritage of the area is described on page 7 of the	LHR on behalf of	10/10/2013	Email and	The heritage component of both the draft and

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final scoping report. It is submitted that the description is inadequate and totally underplays the significance of this vital heritage resource. It fails to identify the area (in particular the Cave of Hearths) as one of the most important deeply-stratified Stone Age archaeological sites in southern Africa and that it represents a regional hub of hominin cultural activities spanning over the last 500,000 years. Further, it does not identify the area as a significant prehistoric archaeological landscape when placed in the contexts of its surrounds.	MIACC		letter	final Scoping reports were informed by a Heritage Statement Report (HSR) and Notification of Intent to Develop (NID) submitted to the South African Heritage Resources Agency (SAHRA) and the Limpopo Provincial Heritage Authority (LIHRA). This report was submitted on 18 June 2013.  The HSR addressed among other heritage aspects:
Given the rich heritage of the area historically, geographically and archaeologically, it is recommended that systematic field work be done, as well as <i>in situ</i> test excavations for buried landscapes and archaeological surfaces, especially when considering that only repeated systematic field evaluation by specialists in Palaeolithic archaeology, geomorphology and karstic geology can ensure that sites are identified, studied and reported on. In this regard it is necessary to appoint specialists to conduct studies, which is not done in the final scoping report.	LHR on behalf of MIACC	10/10/2013	Email and letter	<ul style="list-style-type: none"> <li>• The palaeontological potential of the Platreef Project area;</li> <li>• The prehistoric archaeological record with specific reference to:                             <ul style="list-style-type: none"> <li>○ Stone Age archaeology referencing the Cave of Hearths in the Makapan Valley; and</li> <li>○ The Iron Age archaeology referencing the origin and antiquity of the Ndebele resident in the area, including issues of ethnicity and language in the project area.</li> </ul> </li> </ul>
The final scoping report also does not adequately address how mitigation (which should be done to ensure the preservation of resources in the area especially given the high scientific and economic importance attached to hominin fossil material) should adequately be undertaken. Generally, these issues and concerns also feed into the right that future generations have to their environment protected.	LHR on behalf of MIACC	10/10/2013	Email and letter	<ul style="list-style-type: none"> <li>• The history of the Vaaltyn Kekana Ndebele and their relationship to white settlers from the mid-19<sup>th</sup> century.</li> </ul>
<b>Colonial period:</b> The final scoping report entirely omits the colonial past. There is no indication that the consultant is aware of evidence that the Kekana people have occupied the area for over 300 years with the result that there are deep cultural connections between the people and ancestral burial sites, archaeological artefacts and vernacular structures. Given this omission it is highly likely that it will also be omitted during the EIA phase, thus excluding the appropriate specialist expertise that is needed. It is thus	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>The HSR that was submitted to SAHRA and LIHRA – and thus a public document available for review – specifically stated that the Ndebele in general may have occupied the region from as early as the 15<sup>th</sup> century. This statement is based</p>

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<p>recommended that it is identified in the scoping report phase and that the appropriate specialists are appointed to ensure it is properly discussed and ventilated at the later phases.</p>				<p>on archaeological evidence that indicated occupation of the region by groups who share specific ceramic (pottery) traditions linked to the historical and present day Kekana Ndebele. The information was collected through reviewing credible information sources including peer reviewed journal articles and archival sources.</p> <p>Sources of risk to heritage resources were also described in the HSR. These sources of risk informed Digby Wells' recommendation for the undertaking of a HIA.</p> <p>Subsequent to the submission of the HSR and NID, SAHRA concurred with our recommendations in their Interim Comment, 21 August 2013, stating that:</p> <p>“SAHRA agrees with the recommendations of the report and would like specifically to request that:</p> <ul style="list-style-type: none"> <li>• A heritage impact assessment must be compiled and included in the environmental impact assessment report.</li> <li>• The heritage impact assessment must include archaeology, palaeontology, intangible heritage and an assessment of burial grounds and graves (s. 36 of the NHRA).</li> <li>• Given the proximity (20km) of the mine to the National and World Heritage Site of Makapan (Cave of Hearths), SAHRA recommends that the possible impact of</li> </ul>

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				<p>the mine on this site be assessed. This assessment must also consider the likely visual impact.</p> <ul style="list-style-type: none"> <li>• The palaeontological impact assessment, conducted by a palaeontologist, must take into consideration the entire mining area. SAHRA leaves it to the discretion of the specialist to decide which sections of the project area should be subjected to a field survey”.</li> </ul> <p>Consequently, Digby Wells has completed a HIA founded on the Interim Comment received from SAHRA. The HIA report was submitted to SAHRA and LIHRA on 11 October 2013. Please refer to this report on the South African Heritage Resources Information System (SAHRIS) (Case ID: 566) for details. A summary of findings of the HIA are provided below:</p> <ul style="list-style-type: none"> <li>• No evidence of palaeontological resources were found on the surface, although there is an inherent potential for fossils to occur in underlying rocks;</li> <li>• Three Iron Age archaeological sites were identified and recorded;</li> <li>• One historical werf was identified;</li> <li>• No visual, air quality and noise impacts were identified in relation to the Makapan World Heritage Site; and</li> <li>• 55 burial grounds were identified.</li> </ul>

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				<p>Digby Wells recommended the mitigation to include:</p> <ul style="list-style-type: none"> <li>Project related mitigation, i.e. potential impacts on identified heritage resources may be avoided or reduced through appropriate project planning and design;</li> </ul> <p>Mitigation of heritage resource, i.e. where project related mitigation does not sufficiently reduce impacts, those resources that will be affected will be subject to mitigation for which permit applications need to be submitted to SAHRA and/or LIHRA as the case may be.</p>
<b>Relocation</b>				
<p>The final scoping report does not directly mention relocation. However, relocation has been on the card in several earlier documents, including the different versions of the Technical reports for the proposed mine. Our clients have also been informed, at several community information sessions that relocation is likely and the issue has come up, and not been adequately addressed at these information sessions.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<p>An identification of the households that will have to be relocated, the size of their properties and how they generate income will need to be assessed and identified in the scoping report.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<p>Mitigation, in the sense of how the communities will be reconstituted in ways that will not destroy how they exist at present, will also need to be identified. In particular the following impacts concerning relocation must be properly identified and explored:</p> <p>1. Whether community cohesion will continue once they are relocated (given that it is a Constitutionally enshrined right to enjoy their culture with other members of that community)</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.

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2. Whether or not, given their ties to the land for their livelihood and spiritually, relocation will be done in consultation with the affected communities	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
3. Whether the infrastructure (roads, transport, municipal services, clinics, schools, recreation and other related services) will be available at the place of relocation in order to ensure that no extra costs are imposed on the relocated residents. In this regard a study will have to be undertaken to ensure all of this can be replicated and are not negatively affected by the influx of large numbers of people	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
4. Whether that which the relocated communities will leave behind will be replicated <i>before</i> their arrival at the place of their relocation	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
5. Whether a specialist study will be done to look at the existing uses of groundwater for domestic and agricultural uses to ensure the same access to groundwater exists at the place of relocation (which is recommended)	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
6. Lastly, whether a specialist study will be conducted to determine the impacts of the mine on adjacent property owners and how they may be affected by relocation of large numbers of people into their areas (which is also recommended).	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
If relocation is no longer expected, then this should be made explicit in the final scoping report, with reasons given as to the change. Relocation may also be necessary to protect the community from environmental impacts such as air, noise pollution and general disturbance from the mine	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<b>Subsistence Land-use, Agriculture and Livelihoods</b>				
The final scoping report reads:‘  <i>Many households within the proposed project area have agricultural plots on communal land. These fields are an</i>	LHR on behalf of MIACC	10/10/2013	Email and letter	<u>Impacts on subsistence agriculture:</u>  The purpose of the Scoping report is to identify potential impact. The investigation and evaluation, together with the mitigation, of these

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<p><i>average of 0.8 ha in size and consist primarily of maize farming. It is likely that these plots are utilised for subsistence purposes in order to subsidise the income of households residing there. In some cases it was reported that owners rent these plots out to farmers a certain period. Some community residents also own cattle which are mostly for subsistence purposes with only a few farmers selling cattle commercially".23</i></p> <p>These plots are utilised for subsistence purposes and must be properly identified as such. People grow fruit and vegetables on them, which is extremely important for food security and sovereignty in the area. The impact that the project will have on the area must be properly identified in the scoping report, with the appropriate mitigating measures identified, particularly when considering that many who will consequently experience alienation from their subsistence will be left wondering how to survive – as this is an area which people, in a very real sense, live off the land.</p>				<p>impacts forms part of the EIA Phase.</p> <p><u>Calculation of Compensation:</u> Platreef has obtained independent valuations for the land under the guidance of the Department of Rural Development and Land Reform (DRDLR). An agricultural survey has also been conducted to identify the field owners and establish the extent of the subsistence farming. This matter will be given the highest priority and consideration.</p> <p><u>Relocation:</u> The current mine plan does not envisage any physical resettlement.</p> <p><u>Alternative land for agriculture:</u> Platreef is currently investigating the possibility of providing land for land.</p>
<p>It is essential that a study look into the impact that the loss of such subsistence land will have on the health and well-being of the residents of Mokopane, with a special focus on women and children as well as the use of common property resources such as wood, wild animals (birds and fish), wild fruit and vegetables and medicinal plants and other wild foods used by the community.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	A SIA form part of the EIA Phase and the findings included in the EIA report.
<p>We make special mention of the fact that it is women who typically are assigned the role of farming and collecting food, water and firewood which would mean that women would lose access to their main sphere of economic activities, increasing</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	A SIA form part of the EIA Phase and the findings included in the EIA report.

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their dependence on men an important factor to consider in a highly patriarchal society.				
Further, it is highly problematic that the calculation of compensation land use agreements only looks at the market value of the land. It is questionable whether this is adequate, just and equitable in the circumstances (which do not necessarily coincide with market value). The true value of the land to those who live off lies in the long terms use of the land and the income and substance value that such land brings to the user. A specialist report is needed that look at the use of the land, what is produced on the land and the value of such production to these users over generations, especially in light of the skills profile of the affected community.	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef will carefully assess the specialist reports from the EIA Phase. This matter is of grave importance to Platreef. Platreef is investigating the possibility of providing land-for-land.
The final scoping report further does not properly identify whether those that are relocated will continue to enjoy access elsewhere to the fruit and vegetables that are being grown for their subsistence as well as access to wild birds, fish and fauna, access to firewood, access to wood for kraals, access to recreational facilities which they currently enjoy and access to the social cohesion they currently enjoy.	LHR on behalf of MIACC	10/10/2013	Email and letter	The current mine plan does not envisage any physical resettlement.
<b>Agriculture</b>				
<p>The final scoping report reads:</p> <p><i>'In order to preserve and/or improve upon the functioning and health of this catchment area, the current agricultural activities would need to better managed and monitored to reduce the severity of the imposed pressures'.<sup>24</sup></i></p> <p>First, it is noted that subsistence activities (planting and grazing) on the communal land are agricultural activities. The Mogalakwena IDP identifies agriculture as important to the rural villages within the Municipality.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.



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A specialist study is needed to identify current agricultural activities in the area and how current agricultural activities (especially water users) will be affected by the proposed mine. It will also have to identify and explain how these agricultural activities will be managed without reducing their agricultural yields and/or the livelihoods of those involved in agricultural activities.	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Access to grazing: Platreef is investigating the possibility of providing land-for-land.</p> <p>Land use for public purposes: One of the principles of resettlement is that no displaced household should be worse off after resettlement than they were before. This does not, however, imply that all livelihoods and land uses must remain the same, but that households' ability to survive and maintain their quality of life should not be jeopardised.</p> <p>This comment will be addressed during the development of a RAP during which intensive consultation will be held with all the resettlement-affected households.</p>
Land-users and those involved in agricultural activities should have the same facilities to keep animals (domestic/farm) that they have at their current place of residence. This would include access to grazing fields (with similar carrying capacity and access to fresh water) as their current grazing fields.	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Comment noted.</p> <p>Platreef recognises that communal agricultural land will fall within the development footprint of the proposed mine. Platreef will enter into a negotiated surface lease agreement with the communities based on processes and valuation as per Government (DRDLR) requirements. The company will also be willing to compensate individuals who have informal land rights in relation to the communal land on a like-for-like basis.</p>
The final scoping report fails to indicate the loss of soil due to chemical deterioration to amongst other loss of fertility,	LHR on behalf of MIACC	10/10/2013	Email and letter	A Soil, Land Use and Land Capability Impact Assessment forms part of the EIA Phase and will

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acidification, salination and soil pollution.				consider loss of soil through physical and chemical deterioration.
The final scoping report fails to identify to what extent the land is used for public purposes.	LHR on behalf of MIACC	10/10/2013	Email and letter	A Soil, Land Use and Land Capability Impact Assessment forms part of the EIA Phase.
<b>Visual Impacts</b>				
<p>The final scoping report makes no assessment of the scenic quality of the following:</p> <ol style="list-style-type: none"> <li>1. Landform</li> <li>2. Vegetation</li> <li>3. Water</li> <li>4. Scarcity</li> <li>5. Cultural Modification</li> </ol> <p>A sensitivity level analysis of the visual quality of the communal land of Mokopane must be undertaken as well an investigation to adjacent land use forms in relation to the visual value of the site</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>The purpose of the Scoping report is to provide an introduction on the current environment and the potential impacts on this environment.</p> <p>A Visual Impact Assessment form part of the EIA Phase.</p>
<b>Population Statistics</b>				
The scoping report estimates that there are 8 800 households living in the communal villages outside of Mokopane. However, this is an anecdotal estimate emanating from the recognised Chief and must be verified properly.	LHR on behalf of MIACC	10/10/2013	Email and letter	In the SIA, the site-specific study area was identified as the settlements within relative proximity to the proposed project infrastructure, which includes 15 villages in Wards 18 to 30 of the local municipal area. As at the time of the 2011 Census, this area was home to 30 747 households, comprising 125 196 individuals.
<b>River Systems, Wetlands and Related Water Courses</b>				
The scoping report acknowledges that Limpopo Provide and the Mokopane area are water scarce resource areas but fails to address the following whether there will be water enough to	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef is a member of the Joint Water Forum, which forms part of the ORWRDP and the PRUISSSEN water forum. These forums are

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operate the proposed mining activities and how this will affect current water users in the area, both in terms of water availability and quality. The scoping report needs to establish how water use by the project will minimize its water use established. A water quality analysis of all areas potentially affected is required				currently investigating water schemes within the Limpopo Province. The proposed project indicated that the water requirements will be approximately 16.2 ML per day. Platreef has identified alternative bulk water supplies, e.g. Flag Boshielo Dam, Rooiwal Waste Water treatment works and Seekoei Waste Water treatment works. Based on the hydrocensus study the water level behaviour in the project area does not indicated long term positive or negative trends and a healthy balance between local abstractions and annual recharge remains.
The scoping report further fails to address whether the Mogalakwena local municipality has confirmed and approved that it will cope with the pressure brought by the proposed development in terms of service provision around water, sanitation and the infrastructural pressure as a whole, which might come with the proposed development.	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef is in constant communication with the Mogalakwena Local Municipality regarding the requirements and necessary services required for the proposed development.
The final scoping report further needs to address how the proposed dams will comply with SANS requirements and rehabilitated.	LHR on behalf of MIACC	10/10/2013	Email and letter	The EIA details the design of the PCDs according to the DWA Standards.
<b>With regards to the Water Cleansing and Treatment, the following must be indicated</b>				
1. Costing and financial model and time period.	LHR on behalf of MIACC	10/10/2013	Email and letter	Waste water (sewage) created on the proposed mine is envisaged to be treated at the Municipal treatment works. Discussions are on-going with the Municipality. Other waste water will be stored and managed in a closed circuit as per the IWWMP and the IWULA license conditions.

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2. Details and source of all costs used in the model including construction, equipment and operational costs estimated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Not applicable as there is currently no provision for a waste water and sewage treatment plant.
3. The technical goals and standards to meet the aim of water volumes to be treated, quantified levels or standard of water quality to be achieved by the plant.	LHR on behalf of MIACC	10/10/2013	Email and letter	Not applicable as there is currently no provision for a waste water and sewage treatment plant.
4. Key assumptions regarding the surrounding environment that may impact on the construction and operation of the plant	LHR on behalf of MIACC	10/10/2013	Email and letter	Not applicable as there is currently no provision for a waste water and sewage treatment plant.
5. Time frames and discount rates used with reasons for their use.	LHR on behalf of MIACC	10/10/2013	Email and letter	Not applicable as there is currently no provision for a waste water and sewage treatment plant.
6. Treatment of likely inflation of cost, of depreciation over time and salvage value with reason.	LHR on behalf of MIACC	10/10/2013	Email and letter	Not applicable as there is currently no provision for a waste water and sewage treatment plant.
The final scoping report states that the proposed mining development is situated in the Mogalakwena river valley and flood plain and that there are 4 main water source draining across or adjacent with also 2 main wetland systems. It is argued that the Mogalakwena flood plain plays a major role in replenishing the underground water system and in the river system as a result. It is therefore necessary that an independent study be done to investigate how these water courses will be affected by the proposed mining development.	LHR on behalf of MIACC	10/10/2013	Email and letter	Hydrological, aquatic ecology and wetland studies form part of the EIA Phase of the application process. These studies will (amongst other things) determine the health and ecological functionality and importance of the various systems. The significance of the potential impacts on the systems will also be determined as part of the specialist studies.
<b>In particular, the study should look at</b>				
1. The extent of dewatering of the shaft	LHR on behalf of MIACC	10/10/2013	Email and letter	The Groundwater Impact Assessment and associated numerical modelling will quantify groundwater inflow and future impact on the groundwater system.
2. The nature, duration extent and frequency of the water source and its physical and chemical characteristics must be fully established.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the Groundwater Impact Assessment the quality of water in the proposed mining area will

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				be determined.
3. The sensitivity of the environment with regard to the Mogalakwena/Nyl River System and wetland must be fully established up-as well as downstream.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the Wetland investigation as part of the EIA Phase the systems will be assessed and functionality determined.
4. The wet and dry cycles of the Mogalakwena/Nyl River and catchment area must be fully identified and investigated.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the Wetland investigation as part of the EIA Phase the systems will be assessed and functionality determined.
5. The interaction between the Mogalakwena/Nyl River System and tributaries North of Mokopane must be established.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the Wetland and Aquatic Ecology investigations as part of the EIA Phases the systems will be assessed and interaction determined.
6. A full investigation must be conducted in order to prevent pollution to the water resource.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the water studies mitigation measures will be identified to limit/minimise impacts on the water resources. Monitoring programmes are also in place to continuously monitor the quality of water in the proposed Project area.
7. The cumulative effects of the mine together with other mines and proposed mining on the Mogalakwena/Nyl River System should be indicated and investigated.	LHR on behalf of MIACC	10/10/2013	Email and letter	A Cumulative Impact Assessment will be undertaken during the EIA Phase.
8. Strategies used with regards to existing development pressure, resource quality and quantity within the greater catchment area of the Mogalakwena/Nyl River System must be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the water studies mitigation measures will be identified to limit/minimise impacts on the water resources. Monitoring programmes are also in place to continuously monitor the quality of water in the proposed Project area.
9. Measures must be taken to minimize the impact on a local and regional level within the catchment area as well as indirect and cumulative impacts must be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.

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10. The zone of impacts for upstream and downstream water users must be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
11. The likelihood of acid mine drainage must be established.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted. Geochemistry investigations form part of the Geohydrological Impact Assessment during the EIA Phase.
12. The wetland zones affected by the proposed mine.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the Wetland investigation as part of the EIA Phase the systems will be assessed and functionality determined.
In addition, the significance of these courses to the area, including to the people who use and depend on the water as well as the ecological support role played by the system must be further investigated in order to assess the true value of the system as compared to the proposed mining activities. Also, the spiritual value of the Mogalakwena/Nyl River must be established.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the EIA Phase of the application process detailed hydrological, aquatic ecology and wetland studies will be undertaken. These studies will (amongst other things) determine the health and ecological functionality and importance of the various systems. The significance of the potential impacts on the systems will also be determined as part of the specialist studies.
It is unclear how the mining activities will affect underground water, including underground water levels and quality. During prospecting, water sources have been contaminated. A high probability of water contamination therefore exists.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.
<b>The final Scoping report must address</b>				
1. The extent of the area in which groundwater will be affected must be determined and delineated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater

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				<p>system.</p> <p>In addition to this, the current design is to include a grout curtain to prevent any inflow of water from the aquifer up to approximately 45m. Thereby mitigating the impact of dewatering the aquifer system currently used in the area.</p>
2. The water requirement and the exact location of the private owned boreholes.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase. The hydrocensus identified the boreholes surrounding the study area. These boreholes are monitored on a monthly basis and will form part of the EMP monitoring programme.
3. The interaction of groundwater between the Mogalakwena River and the proposed mine must be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.</p> <p>It is envisaged that the proposed project will have no impact on the Mogalakwena River based on the conceptual hydrogeological model.</p>
<p>4. The interaction between surface water and groundwater must be determined and the impact of groundwater abstraction of the projection surface water be determined and investigated</p> <p>a) A numerical groundwater flow is required.</p> <p>b) A numerical surface water model is required.</p> <p>c). A numerical map transfer model is required.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed surface and groundwater investigations form part of the EIA Phase which will include numerical modelling.
5. The interconnection of faults and underground fractures must be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater

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				inflow and future impacts on the groundwater system.
6. The impact of loss of recharge of groundwater must be investigated and determined.	LHR on behalf of MIACC	10/10/2013	Email and letter	Very little impact is envisaged however, detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.
7. The traces that explosives (nitrate) will leave in the water must be fully investigated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.
The nature and extent to which the operational guidelines for a Water Use License and for an Integrated Water Waste Management Programme will be adhered to must also be indicated.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<b>Mammals</b>				
With reference to mammals, the description of the potential impacts and affected environment (including fauna and flora) 25 is too generic and superficial to sufficiently inform the EIA phase. It is also not site specific.	LHR on behalf of MIACC	10/10/2013	Email and letter	During the EIA phase a Fauna and Flora Impact Assessment will be undertaken and will investigate the significance of potential impacts from the mining operation on the environment.
Even through a desktop study, more detailed information should be available on the biodiversity in the area and the potential impacts of the project. Using currently available information developed by SANBI, particularly the national, provincial and local biodiversity planning maps, the scoping study should have provided more detailed and relevant information for the proposed project.	LHR on behalf of MIACC	10/10/2013	Email and letter	The purpose of the Scoping report is to provide a baseline with regards to fauna and the various sources of information as listed will be consulted during the EIA phase. Based on this information and specialist investigations the impacts of the proposed mining operation will be quantified as



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				part of the Fauna and Flora Impact Assessment.
It is submitted that the information contained in the final scoping report, as it stands now cannot enable the development of a comprehensive plan of study for the next phase of the EIA process. It is also too generic to enable informed decision making on the need for specialist studies and related terms of reference.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
The final scoping report also does not comprehensively or at all address potential cumulative impacts from the proposed project.	LHR on behalf of MIACC	10/10/2013	Email and letter	Cumulative impacts are investigated as part of the EIA .
<b>Endangered Trees and Plants</b>				
A specialist study is needed to properly identify all trees and plants that will be affected by the proposed mine and particularly, which of these are protected. If protected or endangered trees and plants are found within the project area, permits to remove or destroy them must be obtained from the relevant authorities. Considering the above, it is important for the Department of Water and Forestry to be included as a relevant government department responsible for the various aspects of the environment, land and infrastructure which may be affected by the proposed prospecting or mining operation. <sup>27</sup>	LHR on behalf of MIACC	10/10/2013	Email and letter	A Fauna and Flora Impact Assessment forms part of the EIA phase. A detailed vegetation study will be conducted and the protected plant species (trees and shrubs) occurring in the study area recorded. The mitigation measures for protected plant species include obtaining permits for their removal. The Department of Water and Forestry is an integral part of the flora survey, all tree species protected by this Department legislation have been indicated and mitigation measures have been suggested for in the event that these species could be harmed by construction activities.  Refer to Section 2.6.5 of the MPRDA Scoping report and Section 7.3 of the NEMA/NEMWA Scoping report.
<b>Socio-economic Conditions</b>				

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Although the social and labour plan (SLP) is not part of the final scoping report, the final scoping report includes references to employment, local goods and services and relocation and ultimately the social impacts uncovered in the impact assessment will feed into the SLP process. The issues which have been identified below have an impact on the social and economic well-being of the rural community in Mokopane.	LHR on behalf of MIACC	10/10/2013	Email and letter	Noted
<b>Transport</b>				
<p>While impact on existing roads has been identified it must be Understood from the perspective of all stakeholders and not just the mine. These will include:</p> <ol style="list-style-type: none"> <li>1. Access to town due to damage to key roads;</li> <li>2. That greater journey times will increase isolation which have damaging social and economic consequences; and</li> <li>3. Concern over higher transport costs.</li> </ol> <p>With reference to point 2 above, a study would have to be undertaken to survey where people are employed and whether new roads for general use need to be built to ensure that those who are employed do not lose jobs as a result of transport related issues. The study will need to assess whether people will be spending more money than they currently are to use transport and if they are the study will need to identify ways in which this will be mitigated.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>A Traffic Impact Assessment forms part of the EIA Phase. The conclusion of the report was that the proposed mine would cause an increase in traffic, however the existing road network can accommodate this.</p> <p>Platreef is investigating alternative routes to access the project area, as well as the feasibility of upgrading local roads.</p>
<b>Employment</b>				
Eligibility for employment needs to be clearly set out and where community members cannot meet them, training to aid eligibility and other such mechanisms must also be clearly identified and defined as well as the prospects of success of these trainings or mechanisms.	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef currently has a strategy in place to ensure that the local people are trained for the relevant jobs which will become available during the mine development and as outlined in the SLP, R45million will be provided for Human Resources and Skills Development.

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				<p>Platreef is planning four labour centres, situated within four Mokopane Community Centres, which will enable the community members to register as job seekers, to be considered for employment on the project and also to be considered for other interventions. Platreef intends to build a MQA accredited training facility to deliver accredited mining and engineering skills programmes, full qualifications and learnerships. The training centre will be used for core technical training interventions for employees of the Mine and the plants as well as to develop the talent pool for the Mine and plant by delivering core technical training programmes to the people from the community.</p> <p>A Skills Audit was undertaken in conjunction with the Department of Labour as part of their Employment Service of South Africa (ESSA) initiative, to determine the skills available in the study area. This register will be used to complete an analysis on the skills base of the area in order to focus the skills development requirements in future.</p> <p>Learnerships for specific core skills will be offered which include engineering, boiler making and underground mining. R3.4 million will be invested over the first 5 years. Platreef will be implementing a bursary programme and has already extended invitations for three applicants (from the local communities) for industry-related</p>

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				studies for sponsorship in 2014. Platreef intends to provide ABET training, the objective being to make functional literacy and numeracy skills available to all of those employees who do not have the minimum entry level of Grade 12/N3 in order to become employable within the mine and the plant in 2019.
Studies on the creation of jobs would need to identify <i>inter alia</i> :				
1. What kind of jobs will be created;	LHR on behalf of MIACC	10/10/2013	Email and letter	Both skilled and unskilled jobs will be created.
2. Who will be employed;	LHR on behalf of MIACC	10/10/2013	Email and letter	As far as possible local people will be employed and skills development and training will be provided to enable local people to access jobs on the mine.
3. Likely number of local inhabitants that will be employed;	LHR on behalf of MIACC	10/10/2013	Email and letter	This number will be confirmed once the employment of the workforce for the mine is undertaken Platreef is committed to employ as many people from the local communities as possible.
4. To what extent these match the skills profile of the host community;	LHR on behalf of MIACC	10/10/2013	Email and letter	As stated skills training will be provided to enable the host community to access jobs on the mine.
5. What the necessary requirements of these jobs are;	LHR on behalf of MIACC	10/10/2013	Email and letter	The positions and number of vacancies in respect of these specific jobs can be found in the SLP which will be made available.
6. Whether there would be an increase in employment for the existing community;	LHR on behalf of MIACC	10/10/2013	Email and letter	There will be an increase in the employment opportunities for the existing community as this is a commitment in the SLP which will be audited by

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				the DMR
7. What the duration of the projected mining related jobs would be	LHR on behalf of MIACC	10/10/2013	Email and letter	At this stage the mines life of mine is 30 years. The SLP also looks at providing non mining related skills which will provide an income for ex mine employees after mine closure.
8. Mechanisms to make those ineligible community members eligible for employment.	LHR on behalf of MIACC	10/10/2013	Email and letter	The SLP commits Platreef to providing skills to enable the community to access jobs on the mine.
<b>Skills Development</b>				
<p>There is only a single reference to skills transfer measures to be directed at any categories of persons other than employees of the mine and this passage simply states that the mine will</p> <p><i>“give communities the skills required to remain economically viable and successful after the mine closure”.</i><sup>28</sup></p> <p>There is no account of the types of mechanisms by which skills transfer will take place which ought to be identified.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Platreef, through its Social and Labour Plan will be investing in the skills development of selected individuals in the communities. The Social and Labour Plan deals with the interventions planned for the next 5 years, after the acquisition of a mining right. Platreef is planning to provide the following interventions in the first SLP cycle:</p> <ul style="list-style-type: none"> <li>• Adult Basic Education and Training (450 interventions)</li> <li>• Engineering Learnerships (27 people)</li> <li>• Non-core skills in construction (390 interventions)</li> <li>• Core skills (2425 persons)</li> <li>• Bursaries for University Degree (10 interventions)</li> <li>• Scholarship (390 interventions).</li> </ul> <p>The above interventions will kick start the skills development initiative of Platreef in the communities. The second SLP cycle</p>

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				<p>interventions will only be planned at the appropriate time in the future.</p> <p>In addition to the direct skills development initiatives, Platreef will through its SLP invest effort and finance into Local Economic Development projects where other skills are development such as sustainable gardening and farming. Platreef will also develop and support four community centres, where community members may be assisted in enterprise development. These centres will also accommodate satellite offices of the South African Police Service, the South African Social Security Agency and Department of Labour.</p> <p>Platreef will also establish a Future Forum to look into the downscaling plans and the types of mechanisms that will be required.</p>
<b>A study on Skills Development would need to include</b>				
<p>1. what will be done to transfer skills to those who will not be employed in particular women and children who will represent the majority of those not employed in this project</p>	<p>LHR on behalf of MIACC</p>	<p>10/10/2013</p>	<p>Email and letter</p>	<p>Children will be benefitted through the scholarship interventions and schools support programmes. Women will be included as far as possible for employment purposes and to provide services to the mine. Platreef will endeavour to equip women with skills as far as possible, for example one of the LED projects, the agricultural training project, which will provide women with skills in farming.</p>

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2. The proportions of the population that have attained different levels of qualification and what those qualifications are;	LHR on behalf of MIACC	10/10/2013	Email and letter	Platreef is in the process to conduct a skills and ability audit that should be completed by middle 2014. The population proportions and levels of development will become more accurately known by then. Currently Platreef is dependent on the national statistics and municipal data.
3. The skill makeup of the population by gender, race, and village/town including the proportion of those that are literate, the proportion with basic numeracy skills and the proportion of the population with mathematics	LHR on behalf of MIACC	10/10/2013	Email and letter	These details will become apparent when the results of the skills audit are finalized.
4. Lastly, how generally applicable the transferred skills will be.	LHR on behalf of MIACC	10/10/2013	Email and letter	The construction and mining skills that will be developed in the communities, will respectively be used when the mine is built and during the operational phase. These are portable skills that can be applied in the market outside of the Platreef project as well. The other skills, such as the non-core skills are also portable. Skills gained from ABET training are a stepping stone to further skills development and leads to employees being able to participate in further accredited skills programmes with the ultimate view of being able to gain skills and qualifications that are both core to the business and are portable.
<b><i>Mine Personnel</i></b>				
Special reference should be given to the influx of personnel and the socio-economic impacts that they bring such as the impact on infrastructure and facilities. In this regard a specialist study	LHR on behalf of MIACC	10/10/2013	Email and letter	A SIA will identify, discuss and rate the significance of a number of impacts pertaining to

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<p>will be warranted. It is recorded that the draft SLP has not been made available to our clients, despite submitting requests and a formal PAIA application, the latter of which was rejected.</p>				<p>the influx of people during the EIA Phase. The SLP will be made available.</p>
<p><b>Mokopane Town</b></p>				
<p>The final scoping report fails to explain how the proposed mine will affect the growth or future expansion of Mokopane town, and how this relate to the Integrated Development Plan and Spatial Development Plan for Mogalakwena Local Municipality.</p>	<p>LHR on behalf of MIACC</p>	<p>10/10/2013</p>	<p>Email and letter</p>	<p>A SIA forms part of the EIA Phase which will consider the impact of the proposed development on the Mokopane town. The SIA will make use of the IDP and SDF when assessing the impacts associated with the proposed development. The IDP and SDF do not constitute legal limitations on the activities that may be undertaken within the Municipality. A development of this kind is not prohibited and will be adjudicated on the basis of its merits.</p> <p>The draft SLP was developed with consideration of the current IDP and the SDP of the Mogalakwena Municipality. The mine will not put pressure on Mokopane since the IDP and SDP can absorb the additional social amenities and facilities that may be required as a result of the development of the mine.</p> <p>A specialist housing and accommodation survey was conducted by the independent consultants (April 2013) which confirmed the availability of accommodation in Mokopane.</p> <p>(refer to WESSA comments)</p>



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<b>Mining method, mining process and waste storage facilities</b>				
<p>The final scoping report states: <i>'After mining of each stope is completed, they will be backfilled with cemented fill. Initial studies have assumed the use of cemented rock fill, but both paste fill and hydraulic fill options will be evaluated during future studies.'</i><sup>30</sup> It is recommended that the use of cemented rock fill should be employed since it will enhance long term geotechnical stability, it will avert subsidence, and to impede the movement of potential contaminants in mine water on closure. This should be identified in the scoping report and discussed further at the EIA stage.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Cemented rockfill and at a later stage paste backfill will be used to backfill the voids to allow for total mining of the reef.</p> <p>A number of studies on undermining of surface structures and construction over mined areas have been undertaken. The studies have shown that there have been no incidents of subsidence in South Africa where the depth of mining is greater than 300m, apart from block and sub level caves, where this is intentional. If an individual stope fails, it is not possible for the failure to propagate all the way to surface. As the rock fails it bulks and the void will be filled by the broken rock.</p> <p>The planned Platreef underground mining will have no effect on the ground surface, due to the depth and mining method.</p> <p>Based on the above, backfilling will therefore not be required to prevent subsidence but rather to optimise mining.</p>
<p>Backfilling is probably essential to preventing subsidence on the surface. This is especially important since mining will take place under habitations and agricultural areas that could be damaged or made unusable by subsidence. Backfilling is typically done only in stopes, and not access tunnels shafts, etc. Thus, it is recommended that the potential need to backfill mine access workings should be identified and discussed further at the EIA</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>No subsidence is expected.</p> <p>A number of studies on undermining of surface structures and construction over mined areas have been undertaken. The studies have shown that there have been no incidents of subsidence in South Africa where the depth of mining is</p>

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stage, especially in shallow portions of the mine, and in areas under communities and important agricultural use.				greater than 300m, apart from block and sub level caves, where this is intentional. If an individual stope fails, it is not possible for the failure to propagate all the way to surface. As the rock fails it bulks and the void will be filled by the broken rock.  The planned Platreef underground mining will have no effect on the ground surface, due to the depth and mining method.
The final scoping report goes on to state:  <i>'Tailings storage facility (TSF)-The Rietfontein 2 KS site within the boundaries of the proposed project area will be developed as a single compartment side-hill type tailings storage facility with a footprint of approximately 250 ha'.</i>  At the outset it must be noted that a TSF can have environmental impacts because of the size of the facility, which might displace exiting uses, and because the tailings themselves can potentially leach contaminant into groundwater. These impacts must be identified in the scoping report. Further, even if the size of the tailings dam is small, it must be engineered to withstand hydrologic and seismic events in perpetuity.	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations form part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system. Leachate and geochemistry tests will be completed as part of the study to determine the design requirements of the TSF.
When taking into account the size of the TSF, its proximity to communities and the use of adjacent lands for agricultural production, is that it would be useful to employ the "impact assessment methodology" described in section 9 of the Final Scoping Report for the Proposed Platreef Mining Project, August 2013 to the selection of the potential tailings disposal facility locations (Appendix A, Plate 2).	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
In Appendix D: Anticipated Waste Inventory for the proposed project, the tailings are classified as "hazardous". There is	LHR on behalf of	10/10/2013	Email and	A geo-hydrological study forms part of the EIA

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however, no mention of, or evaluation of, or need for a liner to prevent the potential contamination of groundwater. In considering this shortfall, it is submitted, that the use of a liner as a mitigation measure is identified in the scoping phase, and evaluated further in the EIA.	MIACC		letter	and will include geo-chemical analysis. Following the outcome of this study, recommendations will be made with regards to whether a liner for the tailings facility will be required.
<p>The final scoping report also states:</p> <p><i>'Dewatering of underground mining areas may lead to a decline in the groundwater levels in the immediate surrounds of the mining area causing a cone of depression. This may impact surrounding communities who make use of groundwater wells for their daily supply need'.<sup>31</sup></i></p> <p>In addition to evaluating the hydrology of local groundwater, and modelling the potential impacts of the cone depression for the mine, provisions should also be identified at the scoping phase (and thus put in place in future) to replace any groundwater resources lost due to mine dewatering.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Detailed groundwater investigations will be undertaken as part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater system.</p> <p>The impact of dewatering (cone of depression) on the local aquifer system is not expected to be significant. In addition curtain grouting of the shafts will take place to prevent water ingress.</p>
It appears that mine development could occur underneath or directly adjacent to several communities. <sup>32</sup> Blasting, has not however, been identified as an impact, nor have appropriate mitigation measures been identified. This is so, even though blasting could induce vibrations that would be felt at the surface, and could potentially damage structures over or near the underground workings. It is thus recommended that the potential impacts of blasting should be identified, as well as the relevant mitigation measures (such as limiting the timing and size of the blasting).	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>Comment noted.</p> <p>A blast survey will be conducted for each shaft and a blast monitoring programme will be implemented during the construction and operational phases.</p>
The final scoping report does not mention the geochemistry of the tailings and waste rock that would come to the surface. This is generally information that a mine manager would know and thus should be identifiable and subject to inclusion in the final scoping report as well as the EIA phase. It is thus recommended that the geochemistry of the tailings and waste rock that will	LHR on behalf of MIACC	10/10/2013	Email and letter	Detailed groundwater investigations (including geochemical analysis) will be undertaken as part of the EIA Phase and the numerical modelling studies are designed to quantify groundwater inflow and future impacts on the groundwater

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come to the surface should be identified in the scoping report and discussed in the EIA phase.				system.
The final scoping report fails to indicate when and by whom the produced ore will be refined and smelted.	LHR on behalf of MIACC	10/10/2013	Email and letter	No off take agreements of the concentrate produced, have been concluded. Platreef is in negotiations with local smelters.
Our client reserves the right to comment on any possible changes to introduce an open caste mine, which will have great impacts on the lives and livelihoods of Mokopane community.	LHR on behalf of MIACC	10/10/2013	Email and letter	Comment noted.
<b>Air Pollution</b>				
The system that is proposed in the final scoping report to quantify dust-fallout only addresses exposure to dust but does not identify and assess how the dust affects human health and quality of life. An independent study is necessary that investigates airborne pollution where windblown dust disperses from the mine and onto the neighbouring community. This study should not be limited to analysing the insoluble component of the dust fallout as expressed monthly means of dust-fall rate, but should also assess the impacts as a result of exposure of high levels of dust-fallout as experienced in acute episodes. The study must also analyse components of heavy metals (including isotope fingerprinting of the heavy metals to establish the source) as well as the long-terms health impacts/risks associated with the pollution	LHR on behalf of MIACC	10/10/2013	Email and letter	The Air Quality Impact Assessment forms part of the EIA Phase and will determine the necessary mitigation measures and will quantify the dispersion of particulate matter.  The impacts of the particular matter on the health of humans will be assessed during the EIA phase by completing a Health Impact Assessment.
In addition, the final scoping report must address how they intend to identify mitigation measures.	LHR on behalf of MIACC	10/10/2013	Email and letter	The Air Quality Impact Assessment to be undertaken during the EIA Phase will determine the necessary mitigation measures.
We submit that a medically lead assessment of the long-term health impacts of dust inhalation must be undertaken.	LHR on behalf of MIACC	10/10/2013	Email and letter	The Air Quality Impact Assessment to be undertaken during the EIA Phase will determine the necessary mitigation measures.  The impacts of the particular matter on the health

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				of humans will be assessed during the EIA phase by completing a Health Impact Assessment.
<b>Rehabilitation</b>				
<p>The final scoping report states: <i>'After mine closure and rehabilitation of mined areas, the land capability may return to a state which would allow the continuation of agricultural practices although with better infrastructure'.<sup>34</sup></i></p> <p>Our clients seek a guarantee that rehabilitation will return the land to the same state as prior to mining, that they will be able to continue with their agricultural practices, other socio-economic uses of the land and that they will be able to return to the rehabilitated land. This is especially so when taking into account that the preservation of the environment is inextricably linked with children's rights to have their environment protected as set out in the Constitution. It is further bolstered when considering their rights to cultural identity, and the protection and preservation of African culture which this area, in its rich ancient history, represents.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>With respect to the guarantee that areas impacted upon by mining and the retuning of the land back to agricultural purposes, this responsibility would fall to Platreef for the rehabilitation of the site.</p> <p>To determine the success of rehabilitation post mining it is important to understand the current land use and the land capability of the area in question prior to mining. For this it is recommended that pre-mining land capability is proportionally emulated by post mining rehabilitation.</p> <p>The extent to which rehabilitation can and will be done will determined in the EIA phase.</p>
<p>Based on the above, it is advised that the final scoping report be revised and consolidated to address and include these comments, prior to submission to the DMR. If the scoping report is not substantially changed before submission to the DMR, it ought consequently to be rejected by the DMR in line with section 30(c) of the EIA Regulations. LHR reserves the right to submit additional submissions on the final scoping report if necessary.</p>	LHR on behalf of MIACC	10/10/2013	Email and letter	<p>The comments have been captured and addressed in this Comments and Response Report and will be considered in the draft and final EIA reports.</p>
<b>48 COMMENTS ON THE DRAFT EIA</b>				
<p>The Layers for Human Rights on behalf of MIACC made extensive comments on the Draft EIA these comments as well as the responses are provided in Annexures A, B and C and D</p>				

COMMENT	CONTRIBUTOR	DATE	METHOD	RESPONSE
of this document.				

**Annexure A MIACC's Identified Concerns With the Draft EIA & EMP - 14 December 2013**

**Annexure B Center for Applied Legal Studies Comments on EIA & EMP - 14 December 2013**



**Annexure C Comments on EMA EIA Compared to Scoping Submission - 14 December 2013**

**Annexure D MIACC Detailed review of the EIA, Overall grading of the EIA, and Summary Outcome of the Review of the EIA**