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Project Management, Peer Review, Advisory, Education

"....we all live down stream...."

July 2023

# **ANGLO AMERICAN PLATINUM: RUSTENBURG PLATINUM MINES**

# SERITARITA SECONDARY SCHOOL RELOCATION PROJECT

#### **COMMENT AND RESPONSE REPORT**

### 1. Introduction and Background

Seritarita Secondary School is located in the Skimming and Leruleng Villages approximately 25km northwest of the town of Mokopane, Mogalakwena Local Municipality, Limpopo Province. The school has approximately 840 learners and 24 teachers. The school is adjacent to Anglo American Platinum (AAP) Rustenburg Platinum Mines' Mogalakwena Mine (Mogalakwena Mine), specifically its South Pit. The open pit is impacting the school due to its close proximity to the opencast operations (the school is currently ~800m from the centre of the pit). These impacts include increased dust fallout, noise and tremors which poses adverse health and safety risks. Learning at the school as well as the productivity of the mine are impacted by their incompatible co-existence.

AAP is planning to relocate both Skimming and Leruleng communities, who are also affected by the mining activities. The relocation of these communities is planned for 2027/2028. As the planned extension of the South Pit (Cut 11) will place Seritarita Secondary School within the regulated blast zone (within 500m) of the South Pit, AAP is proposing to temporarily relocate the school outside of the blast zone, but still within the Skimming and Leruleng communities. The proposed location for the temporary relocation is approximately 2,5 km west from the school's current location. The school will be permanently relocated with the overall Skimming and Leruleng Villages relocation planned by AAP.

Alta van Dyk Environmental Consultants cc (AVDE) has been appointed as the Environmental Assessment Practitioner (EAP) for this project to undertake the Basic Assessment environmental authorisation, water use licence application and associated public participation process.

The public participation process associated with the environmental authorisation process focused on obtaining comments and concerns regarding the proposed project from stakeholders. These include authorities, landowners and other identified interested and affected parties. This document contains all comments received from stakeholders so far, as well as the relevant responses.

Company Registration Number: 2011/059764/23

# 2. Comments and responses

This Comment and Response Report (CRR) serves as an appendix to the Draft Basic Assessment Report (BAR) and captures the comments raised by Interested and Affected Parties (I&APs) and authorities during the pre-application period of stakeholder engagement undertaken for the proposed project. The various sources of the comments contained in this report were gathered through the following:

- Pre-application meetings held with the following groups:
  - Mogalakwena Local Municipality on(9 May 2023);
  - Skimming community leadership on (9 May 2023); and
  - Leruleng community leadership, Mapela Traditional Council leadership and the Seritarita School Governing Body on (9 May 2023);
- Email and telephonic correspondence with the following authorities:
  - Regulatory authority for the environmental authorisation (Limpopo Department of Economic Development, Environment and Tourism – LEDET);
  - Regulatory authority for the Water Use Licence Application (Department of Water and Sanitation – DWS); and
- Registrations sheets received from stakeholders

This is a dynamic document and will be updated during the basic assessment environmental authorisation process.

The necessity for the CRR is based on Regulation 44 of the National Environmental Management Act's (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014 (as amended).

**Error! Reference source not found.** captures comments received and noted from stakeholders to date. The table indicates the name of the I&APs, their organisation, the date of the receipt of the comment, the communication method as well as the repose of AVDE (EAP) and AAP (the applicant) to the comment. This report contains all comments that have been received to date on the project.

Table 1: Comment and Response table for the proposed Seritarita School Relocation Project

Nr.	Comment/Question	Commentator	Organisation/ Community	Date	Source	Response
1	What is the distance between the new school and current location and how will accessibility to the new school be influenced?	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The new location for the relocated school is approximately 2,5 km west from the current location.  AAP will provide transport to the learners to transport them to the new school. Access to the school will be obtained from within the community, and via a new proposed access road from the Mapela provincial road.  The new location of the school is still within the community, but on the western side of the community.
2	Will the community be able to use the prefabricated facility after Anglo American has relocated the school to its permanent relocation? Since there is a risk of land invasion, what happens to the facility once the school is permanently relocated?  Will the entire 28ha of the property be cleared of vegetation	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	Should there be a need for the facility in the community, a formal handover can take place.  Only 13 hectares of the 28 hectares investigated will be cleared of vegetation in order to construct the relocated school.
3	Why was the entire 28 hectares surveyed by specialists and where will the fence of the school be?	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The fence will surround the 13 hectares of the school and the remaining hectares will remain undisturbed.  The specialists investigated the entire 28 hectares made available to AAP by the Mapela Traditional Council. This was done to identify any sites to be avoided such as graves/sensitive landscapes.
4	Charity Radipabe advised Anglo American to begin with their process for applying for rezoning as it is a timeous event. She also advised Anglo to appoint a town planner as soon as possible to assist in the process.	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	Noted.
5	When will the overall relocation of the Skimming and Leruleng communities occur?	ML Mushishi	Mogalakwena Local	09/05/2023	Minutes: Pre- Application	The temporary relocation of Seritarita Secondary School is planned for 2024.

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			Municipality		meeting	The school will be permanently relocated once the overall relocation of the Leruleng and Skimming communities take place. The overall relocation is planned for 2027/2028. AAP would like to ensure the safety of the learners currently and therefore need to relocate the school as soon as possible.
6	What material will be utilised for the buildings?	ML Mushishi	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The buildings will be prefabricated structures and will be placed on concrete slabs.
7	Does Anglo have input from the community in terms of a community resolution?	Lebgang Morathu	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	Lebepe Evans from Anglo American confirmed that they are busy engaging with the community and that obtaining this resolution is ongoing.
8	Will the community be involved?	Lebgang Morathu	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The community will be included as far as possible.
9	Is a geotechnical investigation being undertaken? The results of the investigation must be an attachment to the Environmental Authorisation document as supporting documentation.	Charity Radipabe Lebgang Morathu	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	A geotechnical investigation is currently underway and will be included as an Appendix in the Final Basic Assessment Report to be submitted to LEDET.
10	What is the prevailing wind direction around the area of the school, as there may be a health impact resulting from dust of the mine.	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The prevailing wind direction is north northeast and north east. Refer to Figure 5 in the Draft BAR.
11	Who will look after the facility once Anglo has relocated the school to the permanent location. To whom does the responsibility go for maintaining the facility should it not be demolished?	Charity Radipabe	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	The municipality will be informed should a transition take place.
	The municipality must be informed should the transition take place.					
12	What will happen to the school where it is currently situated?	Lebgang Morathu	Mogalakwena Local Municipality	09/05/2023	Minutes: Pre- Application meeting	An Anglo representative stated that there is ongoing discussions with public works. The provincial steering community will inform Anglo as the what the process is to follow.

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13	How long will the pre-consultation take place?	Lesiba Lebo Mtidi Rose Mapoga Malose Phimeas Mgako Lesiba Molala	Skimming council	09/05/2023	Minutes: Pre- Application meeting	Pre-consultation is planned for two months.
14	Is this meeting the only notice we will receive	Lesiba Lebo	Skimming council	09/05/2023	Minutes: Pre- Application meeting	As part of the environmental authorisation process, the following public participation activities will be undertaken:  Pre-application meetings Placing of site notices at the proposed relocation site; Distribution of Background Information Documents (BIDs); Advertisements; Availability of the Draft BAR for public comment (30 days); and Feedback meetings. Refer to Section C of the Draft BAR for full details of the public participating process followed.
15	Can the notices be placed anywhere, as they have their own means of distributions.	Lesiba Lebo	Skimming council	09/05/2023	Minutes: Pre- Application meeting	The site notices are placed at the proposed relocated site, as well as alternatives that were considered. Refer to Appendix E7 of the Draft BAR.
16	The community agrees and accepts the proposed relocation and reestablishment of Seritarita, but on condition of employment criteria.	Lesiba Lebo	Skimming council	09/05/2023	Minutes: Pre- Application meeting	AVDE and Anglo American Platinum takes note of this.
17	The mine contacted us as council a few years ago in terms of the relocation project so we are aware of the project.	Sophia Bohlolo	Mapela Traditional Council	09/05/2023	Minutes: Pre- Application meeting	Noted.
18	The only concern is that the communication	Sakibi Mabula	Mapela	09/05/2023	Minutes: Pre-	Communication between the mine and the

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	between the communities should be fast tracked so that they as council can inform the community of activities.		Traditional Council		Application meeting	communities will be fast racked.
19	How can the communities be involved when the specialist comes.	Sakibi Mabula	Mapela Traditional Council	09/05/2023	Minutes: Pre- Application meeting	An arrangement will be made with the Mapela Traditional Council when the specialists come, and they will arrange for someone from the community to attend
20	They are aware of the school situation, they as leadership have no problem with the relocation. There are just one or two individuals from the community that might have a problem. But they wish for the school to relocate.	Charles Mokwia	Leruleng Chairperson Mapela Traditional Council	09/05/2023	Minutes: Pre- Application meeting	AVDE takes note of the comment.
21	Will the water from the borehole be used as it is?	Sophia Bohlolo Sakibi Mabula	Mapela Traditional Council	09/05/2023	Minutes: Pre- Application meeting	Once the borehole is drilled, water quality tests will be undertaken to confirm the quality before it will be used as a potable water resource.
22	I represent two entities, one as the Council Secretary to the Tribal Council and one as the School Governing Body, as well as a community member.  We contacted the DMRE in 2021 to discuss the issue of Seritarita. They met with the former CEO Tony Power, who indicated the mine employees to go back to the communities to try and identify solutions.  They as the community council does not have issues with the relocation. The land belongs to the Mapela Traditional council, no-one else owns the land.	Lillien Maselesa	Leruleng Kgoro Council Secretary, School Governing Body	09/05/2023	Minutes: Pre- Application meeting	Thank you for your comments and support to the relocation and reestablishment of the school.
23	An agreement between the mine and the community must be drawn to ensure community members will be given the opportunity to go and work at the new school.	Lillien Maselesa	Leruleng Kgoro Council Secretary, School Governing Body	09/05/2023	Minutes: Pre- Application meeting	AVDE takes note of this comment.
24	Individuals against the relocation do not have kids in	Lillien Maselesa	Leruleng Kgoro	09/05/2023	Minutes: Pre-	AVDE takes note of this comment.

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	the school and do not experience the impacts the children are experiencing.		Council Secretary, School Governing Body		Application meeting	
25	They as Leruleng community members are concerned for the safety of their children. They ask that a way forward be concluded as soon as possible as they are not happy with the lives of the children there.	Sophia Bohlolo	Mapela Traditional Council	09/05/2023	Minutes: Pre- Application meeting	AVDE takes note of this comment. The relocation of the Seritarita Secondary School is planned for 2024.
26	Before relocation can take place, they must be given a letter of guarantee which indicates that new school will be built inputs: There will be two schools: primary and secondary; Skimming will never deregistered.	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	There are two community engagement structures, that is, the Kgoro and the Sub Resettlement Working Group. These are the main platforms for engagement and discussions on the relocation of the school.
						In addition, several community meetings were convened to allow community members to debate the matter and the majority took a decision to support the relocation of the school with conditions.
						Therefore, there is no need for a new committee or duplicate structure.
						The educators are employed and represented by the Department of Education. The department is part of the Authorities Working Group engagement structure. This is a stakeholder engagement structure that comprises the key government stakeholders.
27	Mr Molomo requested that the committee team include two educators. The request was not accepted.	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	There are two community engagement structures, that is, the Kgoro and the Sub Resettlement Working Group. These are the main platforms for engagement and discussions on the relocation of the school.
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28	ML Committee is the one which will give us mandate and each and every resolution will be taken in the meeting.	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	The Leruleng Community has taken a resolution to support the relocation of the school with conditions. This was done through the existing community structures and recorded.
						Subsequently, more opportunities were provided for other community members to table their comments and inputs through the existing community structures and broader community meetings led by the Kgoro.
29	Mr Molomo has indicated that councillor Lango was invited to attend a community meeting which he didn't attend.	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	Correction: It's Councillor Elias Laka and the issue of his attendance or non-attendance should be addressed through the existing ward committee.
						In addition, Mr Molomo can express his concerns to the existing ward committee representative in Leruleng: Given Molonyane.
30	In his report, Mr Molomo indicated that:  1 There are a lot of challenges in the community.be treated as special case.  2 Community totally disagree with the relocation.  3 Application must be done and the Seritarita	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	This is Mr Molomo's view and he has a right to express his perspective on current community challenges.     However, AAP has embarked on an intentional Goodwill Plan initiative to

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	issue be treated as special case.					address some of the socio-economic and psychosocial challenges in the community. This work will continue and is supported by other government institutions and partners.
						2 Mr Molomo has the right to express his view and perception. However, there is a written resolution which shows community support of the relocation of the school with conditions. The community-based resettlement liaison officers will contact Mr Molomo to provide further clarity and assurance on this.  3 Agreed. It will be done in accordance
						3 Agreed. It will be done in accordance with required policies and procedures.
31	What will happen if an educator dies due to blasting? The Department must redeploy.	Abram Lesibana Molomo	Skiming (Leruleng)	22/05/2023	Registration sheet (emailed)	Mr Molomo's concern for the safety and wellbeing of the educators is very noble. AAP shares the same concern and is committed to accelerating the relocation of the school from the current unsafe location. In the meantime, AAP is committed to ensuring the safety of educators and learners at the school's current location.