



PUBLIC PARTICIPATION PROCESS

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF AN IRON-AND VANADIUM ORE MINE WITH ASSOCIATED INFRASTRUCTURE/ "GELUK MINE" BY RAKHOMA MINING RESOURCES PTY LTD, FARMS GELUK 512KS, GELUK OOS 513KS AND IRONSTONE 847KS, MAGNET HEIGHTS, WEST OF STEELPOORT, MAKHUDUTHAMAGA LOCAL MUNICIPALITY/GREATER TUBATSE, LIMPOPO PROVINCE

DMR Ref: LP 30/5/1/2/3/2/1/10107EM

ISSUES AND RESPONSE REPORT

(VERSION 3)

IMPACT PHASE - PUBLIC PARTICIPATION PROCESS

DATE OF REVISION: JUNE 2016

PREPARED AND REVISED BY:

Naledzi Group Pty Ltd
Postnet Suite # 320, Private Bag X 9307, Polokwane, 0700
141 Thabo Mbeki Street, Fauna Park, Polokwane, 0699
Tel: 015 296 3988 Fax: 015 296 4021

1. Introduction

Naledzi Group Pty Ltd has been appointed by Rakhoma Mining Resources Pty Ltd as the environmental assessment practitioner (EAP) to undertake and manage the Environmental Impact Assessment Process and obtain environmental authorisation for the proposed development of the “Geluk Mine” at Magnet Heights on the farms Geluk 512KS, Geluk Oos 513KS and farm Ironstone 847KS, Makhuduthamaga Local Municipality / Greater Tubatse Local Municipality in the Sekhukhune District of Limpopo Province.

Rakhoma is majority owned by Vanchem Vanadium Products Pty Ltd (Vanchem). Vanchem is a company of the Duferco Group, one of the world’s top five Vanadium producers and its assets comprise Vanadium Oxides, Ferro Vanadium and Vanadium Chemicals production facilities. Its vanadium processing plants are located within Emalahleni (Witbank), Mpumalanga Province. It is the aim of Vanchem through Rakhoma to secure its own supply of ore by obtaining a mining license. Rakhoma will extract raw ore, Vanadium-bearing titaniferous Magnetite which will then be crushed and screened onsite and sent to Vanchems processing plants at Emalahleni. Production at the proposed mine will be based on Vanchem’s ore requirements.

Rakhoma will be undertaking a listed activity that requires environmental authorisation through an Environmental Impact Assessment Process in terms of the National Environmental Management Act (NEMA), 1998 (Act 107 of 1998, as amended and the EIA Regulations of 2014 (GNR. 982).

The mine will require a waste management license (WML) under the provisions of the National Environmental Management: Waste Act (Act 59/2008) (NEMWA) as amended. An integrated application for environmental authorisation under NEMA and waste management license application under NEMWA was submitted with DMR. (DMR Ref LP30/5/1/2/3/2/1/10107 EM).

A water use license (WUL) and integrated water and waste management plan (IWWMP) under the provisions of the National Water Act No. 36 of 1998 (NWA) is also required for the mine. The application for WUL and IWWMP will be submitted to the Regional Office of Department of Water and Sanitation (DWS) in Lydenburg to the Olifants Water Management Catchment Agency. The details of the WUL are also communicated through the EIA process and its public participation process as an integrated approach is followed for the applications.

The proposal triggers a full Scoping and EIA process under the EIA Regulations, 2014. The first phase of the EIA process is the Scoping Phase, during which interested and affected parties are given the opportunity to comment on the proposed activities and the proposed scope of the EIA specialist studies. The Scoping Report has been prepared in accordance to the NEMA and is to contain all comments and issues received from interested and affected parties during the Scoping Phase.

The Scoping and EIA procedure is described in Regulation 21-24 of the NEMA EIA Regulations of 2014. It is subject to:

- A Public Participation Process in terms of Regulations 40 – 44;
- Scoping Report ito Appendix 2;
- Environmental Impact Report ito Appendix 3;
- Environmental Management Programme ito Appendix 4.
- Closure Plan

The Public Participation Process (PPP) forms the corner stone for detailing the EIR. The process identifies potential interested and affected parties on the project and solicits inputs and comments pertaining to the matter/activity proposed from such parties. Public Participation allows the public to contribute to the project and provides for better decision making by collective inputs from stakeholders, organs of state and specialists. In terms of the EIA Regulations 2014, Appendix 3, the EIR must contain details of the public participation process undertaken during the Impact Phase.

The public participation process is conducted in accordance to Regulation 41 to 44 of Government Notice R982 of the NEMA Regulations. The public is provided access to information which is conveyed through the following methods during the Scoping and EIA process:

- Distribution of background information documents (BID);
- Public Information Sessions;
- Draft Scoping Report (DSR);
- Draft Environmental Impact Report & Environmental Management Programme (EIR & EMPr)

Public access refers to public review periods on documents prepared for the Scoping & EIA Study. The public registration period on the BID is 21 days and the public review period on the Scoping Report, Environmental Impact Report & EMPr is 30 calendar days, respectively.

All comments and inputs received from I&As, stakeholders and organs of state during the Scoping Phase are recorded in a Comments Issues and Response Report (IRR). The IRR provides a summary of the issues received and offers a response to the issues raised. As indicated, the public is consulted in two stages of the process and thus the IRR consists of versions.

The Issues and Response Report versions are:

- Version 1 – IRR appended to the final Scoping Report;
- Version 2 – IRR updated and submitted to DMR post lapse of the public review period of the DSR;
- **Version 3 – IRR appended to the draft EIR**
- Version 4 – IRR appended to the final EIR which is submitted to DMR for approval.

The IRR – Version 1 was appended to the final Scoping Report submitted to DMR on 31 August 2015. The IRR – Version 2 was submitted to DMR on 11 September 2015 with expiry of the DSR public review period.

The IRR Version 3 (this document) is appended to the draft EIR and summarises the inputs received from I&As and public thusfar during the Impact Phase. It will be updated post the draft EIR public review period during which community meetings will be held to facilitate comments on the project. The IRR will thereafter be updated into Version 4 and appended to the finalised EIR for submission to DMR.

2. Summary of PPP for Scoping Phase of the EIA Study

A new set of NEMA EIA Regulations of 2014 has come into effect in 4 December 2014. As per these regulations the Scoping and EIA process must be completed within a time frame of 300 days. The Scoping Phase must be completed within 44 days and is included in the time frame of 300 days. The EAP must manage and submit the Scoping Report within 44 days from application submission. The report must have been subject to 30 days public review before submission to Department of Mineral Resources.

The PPP followed during the Scoping Phase period consists of the following:

- Identifying Interested and Affected parties;
- Advertisement in the local newspaper (project announcement);
- Compile and distribute BID; (allow 21 days for response)
- Placement of site notices on site;
- Send notification letters to I&As to bring application to their attention;
- Give notice in writing of application to organs of state, tribal authorities including competent authority
- Open and maintain an I&A register;
- Consider objections and representations from I&As;
- Make draft Scoping Report available for 30 days public review period;
- Advertise the SR availability in the local newspaper;

- Send SR availability notification letters to I&APs;
- Place the SR at public venues for public review and submit the SR to organs of state, tribal authorities and chiefs who have allocation rights to the proposed mining right area as well as other parties interested and affected.

The opportunity to participate in the Scoping and EIA study and register as an interested and affected party was announced on 27 July 2015.

- A newspaper advertisement was published in the Steelburger Newspaper on 27 July 2015;
- Site Notices were posted on site and in the study area on 27 July 2015. Photographs were taken of the site notices placed in the area.;
- A Background Information Document (BID) was prepared and sent to interested and affected parties, organs of state and tribal authorities on the project on 24 July 2015. The BID was presented in english and distributed via email, hand deliver. It was circulated from 24 July to 20 August 2015;
- Notification Letters & BID's were hand delivered to Organs of State on 31 July and 2 August 2015 and to the Tribal Authorities on 4 and 5 August 2015. These letters were stamped by the receivers (organs of state, Tribal Authorities) affected by the mining right application;

Draft Scoping Report:

A Draft Scoping Report was prepared and made available for public review from 14 August 2015 to 11 September 2015. An IRR Version 1 was submitted along with the Final Scoping Report to DMR on 31 August 2015.

The DSR and Plan of Study for EIA was distributed to all I&AP's and stakeholders for comment on 14 August 2015. There was a delay in publication of the advertisement due to newspaper printing deadlines, thus was published in the Steelburger Newspaper on 21 August 2015 to announce the availability of the draft Scoping Report for public review. Posters were placed in the study area to announce the report availability.

Hard copies of the draft Scoping Report was hand delivered to the organs of state with jurisdiction in matters pertaining to the project, tribal authorities with allocation rights to the proposed mining right area as well as Kgoshi's with certificates to use the property. Kgoshi's without certificates to use the land were notified of the availability of the draft Scoping Report at the above public venues.

Public Information Sessions

Naledzi Group Pty Ltd arranged an information session and consultation meeting with the affected parties of the project area on 21 August 2015 to facilitate comments on the project and draft Scoping Report. The affected parties mostly included the tribal authorities of the area and its Kgoshi's and Kgoshigadi's with allocation rights, certificates to use the properties and even non-certificate holders. Invitations to the tribal authority meeting were distributed to Kgoshi, tribal authorities, Limpopo Department of Rural Development and Land Reform as well as to the Regional Manager of DMR.

The tribal authorities, land occupiers and allocation right holders are represented by two committees nl. LEOLO and LEMICO. Yet the LEOLO was reluctant and unwilling to participate in the consultation process or attend any information sessions due to pending outcomes from DMR on an objection lodged to the department against Rakhoma Mining Resources. These sentiments were also shared by LEMICO. The outcome of the attitudes of the parties led to the suspension of the consultation meeting and refusal by such parties to participate in any further/future planned consultations.

Stakeholders Meeting

- **Pre Application Site Meeting with Department of Water and Sanitation – 21/08/2015**
- **Focus Group Meeting with COGHSTA on 10/09/2015**

A. Pre-Application Site Meeting with DWS – 21/08/2015

A pre-application site meeting took place with the Department of Water and Sanitation: Olifants Catchment Management Agency to discuss the requirements of the WULA for the project. DMR requires that proof of submission of WULA in terms of Section 21 of the National Water Act, 1998 (Act 36 of 1998) must be submitted on or before 31 August 2015.

Naledzi arranged and conducted a pre-application WULA site meeting with the Department of Water and Sanitation: Olifants Catchment Management Agency due to being a key stakeholder in the proposed integrated environmental authorisation/waste management license and water use license application.

The pre-application WULA site meeting took place with DWS on 21 August 2015 at the farms Geluk 512KS, Geluk Oos 513KS and Ironstone 847KS to discuss the project and requirements for the WULA.

It was highlighted by DWS that they would not provide any comments on the Draft Scoping Report. The department would provide inputs on the various required Section 21 water uses based on the Draft Environmental Impact Report content.

B. Focus Group Meeting with COGHSTA Executive Committee – 10/09/2015

Naledzi Group Pty Ltd communicated the project details to Mr H.S Mashele from the Traditional Leaders House of Limpopo Department of Cooperative Governance, Human Settlements and Traditional Affairs (COGHSTA) in Polokwane. The information provided to the department included the Background Information Document as well as the draft Scoping Report prepared for the project. With receipt of the information COGHSTA's executive committee via Mr. Mashele informed Naledzi that they would require a project introduction meeting on 10 September 2015. Naledzi could transfer the project information and details to the executive committee as well as explain the process being followed and status of the EIA process.

Naledzi Group Pty Ltd attempted to conduct the Focus Group meeting on 10 September 2015 at the House of Traditional Leaders at COGHSTA in Polokwane and convey the project information to the executive committee. The project presentation by Naledzi was however stopped by the executive committee due to allegations made by a Tradition Leader from the project area, present at the meeting. The executive committee requested Naledzi Group to leave the meeting, in order for them to clarify the issue. Naledzi Group was therefore not afforded the opportunity to transfer project information and take the executive committee through the EIA process being followed. The attendees at the meeting were advised, before Naledzi left the meeting, of the need to study the project documents submitted to them in order to understand the EIA process and the status thereof.

The proposed Mining Right area has been allocated to several traditional authorities and therefore Naledzi communicated that project details to the department and also requested COGHSTA to provide details on the Sekhukhune District Traditional Leaders House in order to further communicate the project to district level. The information was provided as Sekhukhune District Traditional Leaders House Office, Lebwakgomo Government Complex. The responsible official has been notified accordingly.

The attendance register was not signed at this information session.

Limpopo COGHSTA was advised that further consultation with the department would be undertaken during the Environmental Impact Phase of the EIA study.

Final Scoping Report

The public review period on the DSR has lapsed on the 11 September 2015. With submission of the final Scoping Report to DMR the public review period on the DSR was still in session, Naledzi therefore

captured the comments and issues received up to 29 August 2015 from the public in the IRR version 1 and included it in the Final Scoping Report and submitted it to DMR on 31 August 2015.

The public review period of the draft Scoping Report has now lapsed and the Issues and Response report has been revised/updated to reflect the last comments received for the Scoping Phase. The updated IRR Version 2 is now submitted during September 2015 as a conclusion to the Scoping Phase public participation.

3. Summary of PPP for Impact Phase of the EIA Study

During the Impact phase two consultation meetings were conducted with the key stakeholders for the project (organs of state) and a traditional leadership meeting with the 25 affected chiefs of the proposed project area.

Key Stakeholders Workshop – 4 December 2015, Polokwane

A Key Stakeholders Workshop (KSW) took place on 4 December 2015 at Masana Lodge in Polokwane as part of the EIA phase. The meeting was arranged to transfer technical project details to organs of state, state departments, agencies and service providers. Its purpose was to assist the EIA project team in identifying key issues and impacts that need to be investigated as part of the EIA study. Invitations to the meeting were distributed via email on 24 November 2015 to afore said parties.

All issues, concerns and recommended aspects to be assessed as part of the EIA phase were recorded in the minutes of the KSW. The minutes were distributed to the list of invitees and meeting attendees on 15 December 2015. The comments received during this meeting have been incorporated in this IRR.

Traditional Leadership Meeting – 11 March 2016

A Traditional Leadership meeting was arranged on 11 March 2016 at Khumula Game Lodge, Burgersfort. Three entities were presented at the meeting; Rakhoma, traditional leadership and Naledzi. Traditional leadership involved the 25 chiefs of the study area affected by the proposal. The chiefs were each invited respectively as appose to meeting with various community forums, to realign the consultation process which has been marred by the divisions within the community and the various forums.

The traditional leadership stated their support to the project at the meeting and consented to the continuation of the EIA process, specialist site investigations and scheduling of community meetings. The Minutes of the Traditional Leadership Meeting were approved and signed by traditional leadership on 20 March 2016. The comments received during the meeting have been incorporated into the IRR.

Focus Group Meeting – Makhuduthamaga Local Municipality – 21 April 2016

A focus group meeting took place with Mr Dilakane Phasha, Senior Manager: Town Planning Division of Makhuduthamaga Local Municipality at the municipal offices in Jane Furse on 21 April 2016. The comments and concerns raised by the town planning division were recorded and summarised in correspondence between Naledzi Group and the municipality. The comments have been included in the IRR.

Public Review of Draft EIR and EMPr: July – August 2016

Public participation during the impact assessment phase of the EIA entails primarily the review of the findings of the EIA, presented in the Draft EIA Report and Environmental Management Programme (EMPr).

During the EIA Phase I&APs are notified of the availability of the Draft EIR and EMPr. The report is distributed for public review and comment for a period of 30 calendar days. This provides I&APs the opportunity to review the findings of the EIA and submit comments.

Any comments received from I&APs, organs of state during the public review period of the draft EIR will be captured in this IRR and updated along the final EIR which will be submitted to the DMR.

4. Issues and Response Report

Please refer to page 8 for the summary of issues raised by I&AP's on the project and responses provided thereto.

The following comments were raised on the project during the Public Registration period for the BID, public review period of the Draft Scoping Report and Impact Phase consultation meetings:

The public registration period on the BID took place from 27 July 2015 to 20 August 2015. This is considered Section A. The draft Scoping Report was made available from 14 August 2015 to 11 September 2015. Comments received on the DSR are recorded under Section B. Consultations and meetings that took place as part of the Impact Phase prior to the availability of the draft EIR are recorded under Section C.

NO	Comment	Interested and Affected Party	Date	Response
A1	<p>Kindly note that the farm Geluk 512KS and Geluk Oos 513KS are state owned land under the management and control of Department of Rural Development and Land Reform. The farm Ironstone 847KS is also under the management and control of DRDLR. Land reform has been allocated to the Tswako Maepa tribe, Hlakwana (Rantho) and Bahlawane Ba Maphopha tribes in terms of GN 680/1968, GN 687/1968 and GN 1402/1966 respectively. If the outcome of the EIA leads to mining, Rakhoma Mining Resources will be required to make an application for mining surface lease to LPBSC.</p> <p>The development on the above mentioned state properties will be regulated in terms of Interim Protection of Informal Land Rights Act, 1996.</p>	<p>Limpopo Department of Rural Development & Land Reform</p> <p>Ms Susan Tlabo Molele</p>	<p>Comments and Registration Form 11 August 2015</p>	<p>Noted. The respective tribes have been contacted, informed of the proposed project. Copies of the BID and DSR were hand delivered to these tribes in the project area.</p>
A2	<p>Ghustek Engineering and Project are very interested on this project. We specialise in mining services, such as box, pipeline, liners and operators for different machines. We would appreciate more information on the project.</p>	<p>Ghustek Engineering Isaac Hoko</p>	<p>Email received 3 August 2015</p>	<p>The Background Information Document as well as the DSR was emailed to Gustek Engineering.</p>

A3	<p>My name is Mashilo Tshehla, I am writing in response to the notice published in the steel burger newspaper in relations to the new mining proposal and a call for public participation to the affected and interested parties in the area of Magnet hights. I am a resident of the said area and I would like to be part of the sessions as an interested and affected party to this proposal.</p> <p>Please include my name in the list of the affected parties and include me in the communications thereof.</p>	Mashilo Tshehla	Email received 6 August 2015	The Background Information Document and DSR were emailed to Mashilo.
A4	<p>The Department of Economic Development, Environment and Tourism hereby acknowledge receipt of the BID on 31 July 2015. The department will await submission of the report and supporting documents in order to comment accordingly.</p>	<p>Limpopo Department of Economic Development Environment & Tourism</p> <p>Environmental Impact Management – Mr Tebogo Mashilo</p>	Official response 11 August 2015	Noted.
A5	<p>I am a resident of one of the villages surrounding the study area, I would like to register as an I &AP for the EIA process of the proposed project.</p>	Khutjang Jack Malekane	Email received 7 August 2015	The Background Information Document as well as the DSR was emailed to the I&AP.
A6	<p>I would like to register as an I&AP on the project. I am situated in the Burgersfort area and I am responding to the advert in the Steelburger (dated 31 July 2015).</p> <p>Would be possible to provide me with the project</p>	Anandi Alers	Email received 18 August 2015	The Background Information Document as well as the DSR was emailed to the I&AP.

	information.			
A7	I would like to know much about your project that will be conducted at Magnet heights. I am a local person of the surrounding area, I want to, if possible help in taking part in your business project, can you please furnish me with all relevant information regarding the business, regarding the local business empowerment.i.e. Black economic empowerment.	Sarel Matenche Local resident	Email received 19 August 2015	The Background Information Document as well as the DSR was emailed to the I&AP.
A8	Protected Trees and Natural Trees which may occur on the proposed Mining Right area: Special care to Cartha Edulis and Cartha Transvalensis (Lydenburgia assinoides. The above mentioned tree species are also protected in terms of the National Forest Act 84 of 1998 as amended.	Tshifiwe Matase Forester: Protected Trees Department of Agriculture, Forestry and Fisheries	Comments and Registration Form 22 August 2015	An Ecological Impact Assessment will be conducted as part of the Impact Assessment Phase to identify any protected tree species on the proposed study area.
A9	Please could I register as an Interested Party for the above proposed mining project on the Farms Geluk 512KS, Geluk Oos 513KS and the farm Ironstone 847KS? Please could you email me a copy of the Background Information Document if there is one available and any other documents that is available?	Marlaine Andersen Senior Regional Content Researcher Private Projects Leads 2 Business	Email received 28 August 2015	The Background Information Document as well as the DSR was emailed to the I&AP.
A10	A Traffic Impact Study needs to be undertaken with particular reference to the R555 Steelpoort/Stoffberg to Witbank Road.	Michael York Hart SANRAL	Comments and Registration Form 3 August 2015	A Traffic Impact Assessment Study will be conducted as part of the list of specialist studies for the Impact Assessment Phase. It will be included in the Environmental Impact Report.

A11	No objection to the proposed mine.	Limpopo Department of Public Works, Roads and Infrastructure Joseph Tshikonelo Deputy Director	Comments and Registration Form 3 August 2015	Noted.
A12	<p>This set of Resolutions was adopted and approved by LEMICO General Representative Council in their special meeting held at Ga-Ratau Traditional Council on 7 August 2015.</p> <p>We resolve as follows: LEMICO remains the only recognised structure for consultation and representation of Magoshi, Traditional Councils and Communities concerning all development activities in general and mining projects in particular.</p> <p>We re-affirm our decision take on 21 January 2015 that Rakhoma Mine shall work with all Magoshi affiliated to LEMICO and that all activities for implementation of the mining project shall be consulted with LEMICO. Such include EIA and Water License Application.</p> <p>LEMICO supports the implementation of the mining project BUT that the project must be implemented correctly. Only after agreement is reached with Rakhoma Mine on the implementation of the mining project will Magoshi, Traditional Councils and</p>	LEMICO General Representative Council Mr Paul	Official Response- LEMICO Resolution 18 August 2015	Noted. This resolution was conveyed to Rakhoma Mining Resources and also the Regional Manager of Limpopo Department of Mineral Resources. It was passed on to DMR to highlight the project consultation challenges and the need to suspend the EIA process until further notice as to resolve these issues on the project.

	<p>communities support the EIA process.</p> <p>The Executive Committee must with matter of urgency apply for the interdict against Rakhoma mine to stop all the processes until it has complied to discussions and negotiations with communities. The executive committee must brief the legal representatives that were appointed for this purpose to carry this interdict.</p> <p>All Magoshi and Traditional Councils must STOP any interaction and communication with Rakhoma Mine and his appointed Naledzi Group Consultants until this matter is resolved.</p> <p>All members of LEMICO shall as a result not participate in the meeting scheduled for 21 August 2015 until agreement is reached with Rakhoma Mine.</p> <p>All Magoshi who did not sign the documents from Naledzi Consulting should refrain from signing such documents until agreement is reached with Rakhoma Mine.</p>			
A13	<p>The Leolo Development Committee represents 5 Kghosi's currently occupying the proposed Mining Right Area and has lodged an objection to the Regional Manager of Department of Mineral Resources of the Limpopo Province against Rakhoma Mining Resources Pty Ltd. They have lodged an objection against the mining company and any applications made by Rakhoma to DMR. The Leolo Development Committee indicated that DMR has not responded to their objection nor invited the committee to</p>	<p>Leolo Development Committee Daniel Ntshoane Deputy Secretary</p>	<p>Verbal Communication/comments 18 August 2015</p>	<p>A letter requesting the suspension of the EIA process was submitted to the Regional Manager of Limpopo DMR on 18 August 2015. The formal request for suspension stated the objection and requests from the Leolo Development Committee to DMR and also requested</p>

	<p>convene a meeting to resolve the issues. They have now escalated the objection/matter to the Minister of Mineral Resources, Advocate Mohlodi. They have also not received any response to date from the Minister. They will continue from here to escalate the matter to the President. This committee refuses to interact with Naledzi and or Rakhoma as it would jeopardize their objection and case.</p> <p>This committee is not open for any consultations or discussions until the objection and issues are resolved between them, DMR and Rakhoma. The committee insists that DMR convene a meeting with them and resolve the issues.</p>			that the department resolve the issue to in order to allow the continuation of the EIA process consultations.
Section B: Comments on Draft Scoping Report (14 August 2015 – 11 September 2015)				
B1	<p>I refer to your document dated July 2015 and wish to inform you that Eskom Transmission (TX) is not affected by this application.</p> <p>Your application has been forwarded to Eskom Distribution Gauteng (Land Development Manager, P/Box 3499, Polokwane, 0700) for comments and direct reply to you.</p>	DLC Motsisi Eskom Transmission: Land Management	Official response received 16 August 2015	Noted. Naledzi will further communicate with Eskom Distribution during the EIA study public participation process.
B2	<p>As the Greater Sekhukhune Regional Secondary Cooperative Ltd representing Cooperative enterprises in all local municipalities of Sekhukhune District including Makhuduthamaga Local Municipal areas we would like to show interest in participating in the project from the EIA and would like you to forward us the EIA report if possible so that we can make comments before 11 September 2015 as highlighted in the advertised notice.</p>	Happy Mohlala Regional Secretary Greater Sekhukhune Regional Secondary Cooperative Ltd	Email received 26 August 2015	<p>The Background Information Document as well as the DSR was emailed to the I&AP.</p> <p>Please note that Naledzi is currently conducting the Scoping Phase for the EIA Study. The EIA study consists of two phases n1. Phase 1, the Scoping Phase</p>

	<p>We would like you to please include us as stakeholders in the processes to take place in the whole mining project value chain as we will be interested in participating in assisting the mine and surrounding communities with development of cooperatives which will add value to the whole project in order to increase the number of jobs to be created by the project through other means of enterprises like Agriculture and Manufacturing so that the communities won't only rely on jobs in the mine but appreciate if you can welcome our request with positive mind.</p>			<p>at which a Scoping Report is formulated and Phase 2, at which a EIA Report & Environmental Management Programme as well as a Closure Plan is formulated.</p> <p>The EIA Report is therefore not available yet. The Scoping Report has been prepared and is available for public review from 14 August 2015 – 11 September 2015.</p>
B3	<p>Can you please register me as an Interested and Affected Party and forward me the project information available.</p> <p>Thank you for the quick response. I am hoping for a good communication through the whole process in the achieving the main goal of seeing the Geluk Mine opening and changing the lives of our people.</p>	<p>Kgabe Maimala Glencore Resident at Magnet Heights</p>	<p>Email received 25 August 2015</p>	<p>Mr. Maimela has been added to the project database. The Background Information Document and the DSR was emailed to the I&AP.</p>
B4	<p>Can you please assist with project information? Can you please check out that as local SMME how best could I get an opportunity to go extra miles in growing my logistics in your project?</p>	<p>Samdey Mathuhle Maleka Local SMME</p>	<p>Email received 01 September 2015</p>	<p>Mr Maleka was added to the project database. The project Background Information Document and the DSR was emailed to the I&AP.</p>
B5	<p>We have received the project notification. We will revert the matter to our geologists and environmental department.</p>	<p>Carina Engelbrecht Corporate Lawyer Impala Platinum</p>	<p>Email received 04 September 2015</p>	<p>Noted.</p>
B6	<p>Your application has been captured in our electronic Agri-Land tracking and management system. It is</p>	<p>N. V Maumela Directorate Land</p>	<p>Official comment received 10 September 2015</p>	<p>Noted.</p>

	<p>strongly recommended that you use the on-line AgriLand application facility in future.</p> <p>The detail of your application as captured: Type: Rezoning AgriLand Reference number: 2015_09_0121 Property Description: Geluk No 512 Date: 01 September 2015</p>	<p>Use and Soil Management Department of Agriculture, Forestry and Fisheries</p>		
B7	<p>If the project is going to affect a Natural Forest, it is required that the applicant apply for a license. A specific application form listing all the indigenous trees that are going to be directly affected by the project should be indicated.</p> <p>In terms of Section 15 (1) No person may –</p> <ol style="list-style-type: none"> Cut, disturb, damage, destroy or remove any protected tree; or Collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, except under license granted by the Minister. <p>Comments:</p> <ul style="list-style-type: none"> Some of the protected trees such as <i>Catha edulis</i> (bushman's tea) and <i>Catha transvalensis</i> (Sekhukhune bushman's tea) are highly threatened and removal of such trees should be avoided; The application form for protected trees and 	<p>Ms. N. A Mudau Department of Agriculture, Forestry and Fisheries Sekhukhune District Deputy Director: Forestry Regulations and Support</p>	<p>Official comments received 14 September 2015</p>	<p>Comments noted. An Ecological Impact Assessment Study would be conducted for the proposed mining right area as part of the Environmental Impact Assessment Phase and will be included in the EIR. It will be stipulated within the Environmental Management Programme for the mine that prior to clearing and site preparation an Ecologist must be appointed to survey the area affected by the mine plan and infrastructure for any protected tree species that require removal. The Ecologist is also to identify trees which should not be removed as stipulated. The application for removal of protected trees will be based on the outcome of the site recordings done by an ecologist. The site investigations related to the application as well as the submission of the application would be done once the Environmental</p>

	<p>trees in natural forests should indicate clearly the total number of trees per species to be affected by the proposed activity;</p> <ul style="list-style-type: none"> • The Department would like to form part of the site visit during the impact assessment phase. 			<p>Authorisation has been issued by Department of Mineral Resources.</p> <p>Naledzi Group will host a stakeholders meeting and arrange a site visit for departments which require such during the Impact Assessment Phase.</p>
B8	<p>Comments were made by the Department of Water & Sanitation during a pre-application site meeting to discuss the potential Section 21 water uses which would need to be applied for through a Water Use License Application (WULA) and establish the information requirements for the project:</p> <ul style="list-style-type: none"> • DWS requires a layout plan indicating the mining activities in relation to the watercourse and wetlands on the proposed mining right application area. • A 1: 100 and or 1: 50 year floodline determination of the watercourses on site will be required. The floodline must be overlain on the proposed mine plan. The plan is also to be signed by the engineer; • An Integrated Water and Waste Management Plan must be prepared for the application and submitted to DWS; • Potential Contaminated Drainage (PCD) from the mine site may come from contaminated stormwater runoff and dirty water from mining operations which must be addressed and 	<p>Mr Adam Ramalisa Department of Water and Sanitation Olifants Water Management Catchment Agency</p>	<p>Comments made during a pre-application site meeting with DWS 21 August 2015</p>	<p>All the information requirements will be addressed and included in the Environmental Impact Report (EIR). The specialist studies requested will be undertaken during the Impact Phase of the EIA study and will be included in the EIR.</p>

	<p>management measures need to be included in the IWWMP;</p> <ul style="list-style-type: none"> • A Geohydrological Impact Assessment and Hydrological Impact Assessment will be required by DWS to form part of the Environmental Impact Report (EIR); • An Aquatic Ecosystem Assessment which includes a wetland delineation will be required as part of the EIR; • All associated mine infrastructure must be indicated on the proposed mine layout plan; • The Engineering Service Report which quantifies all the required services for the mining operations will be required and such a report must be signed by the engineer; 			
B9	What type of mining process will be undertaken?	Mr Adam Ramalisa Department of Water and Sanitation Olifants Water Management Catchment Agency	WULA pre-application site meeting with DWS 21 August 2015	The mineral resource is close to surface. The maximum mining depth is expected to be 20m. Strip mining is proposed with simultaneous rehabilitation. It is anticipated that water use would mostly be for dust suppression. (Marissa Botha-Naledzi)
B10	Please include all the proposed water uses on the public participation process documents distributed to I&As and stakeholders to ensure that it is integrated with the PPP for the Environmental Impact Assessment.	Lufuno Rambau Department of Water and Sanitation Olifants Water	WULA pre-application site meeting with DWS 21 August 2015	Noted. Naledzi Group has included this and referred to the water use license application in all the PPP documents. (Marissa Botha-Naledzi)

		Management Catchment Agency		
B10	<p>Where will water be sourced from for the mining operations? Will it be surface or groundwater?</p> <p>Will there be acid mine drainage from this mining operation?</p> <p>Although it is expected that the risk of acid mine drainage formation is low. DWS will require a leachate test.</p>	<p>Lufuno Rambau Department of Water and Sanitation Olifants Water Management Catchment Agency</p>	<p>WULA pre-application site meeting with DWS 21 August 2015</p>	<p>It was proposed in the mining works programme that water will be sourced from an existing borehole on site. It was further indicated that if groundwater is encountered during mining operations and it fills the mining pit area, this water would be removed and stored and used for dust suppression. (Marissa Botha-Naledzi)</p> <p>In the case of iron and vanadium, these metals are generally present in their reduced ionic states in anoxic acid mine drainage, and these forms of the metals are much more stable at higher pH than the fully oxidised ions.</p> <p>The potential impact of mine drainage on water resources and the quality thereof and possible risk of forming would need to be determined in the EIR.</p> <p>A Geochemistry Impact Assessment has been included to form part of the list of specialist studies to be conducted to inform the EIR.</p>

B11	What water uses is being proposed for the mine? (Lufuno Rambau)	Lufuno Rambau Department of Water and Sanitation Olifants Water Management Catchment Agency	WULA pre-application site meeting with DWS 21 August 2015	<p>We have preliminarily screened some Section 21 water uses which include:</p> <ul style="list-style-type: none"> - Section 21 (a) – Taking from a water resource; - Section 21 (b) – for storage of clean water abstracted; - Section 21 (c) and (i) for proposed development within 500m from the wetland; - Section 21 (g) Disposing of waste in a manner which may detrimentally impact on a water resource; and (dust suppression, and storing of stockpile waste water) - Section 21(j) Removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people (dewatering of mining strips/mining pit area if necessary) <p>There is an existing access bridge over the Shakwaneng River. But it is not sure if they would use this access. It may not be feasible due to its ability to carry mine traffic and it may be too close to the residences. (Marissa Botha – Naledzi)</p> <p>Noted. This will be included if required. We will be able to state such in the draft EIR.</p>
B12	If there is a land claim on the proposed mining right area it needs to be sorted out before submission of the WULA	Mr Adam Ramalisa Department of	WULA pre-application site meeting with DWS	Noted.

	<p>to DWS. Also please state if there is a land claim on the properties in the WULA. DWS would need to be updated on the status of the land claim.</p> <p>If the mining method will include backfilling of the strip mined area simultaneous to mining operation, the applicant can apply for exemption in terms of Government Notice 704 under Regulation 4.</p>	<p>Water and Sanitation Olifants Water Management Catchment Agency</p>	<p>21 August 2015</p>	
Section C: Comments received during the Impact Phase consultation meetings (December 2015 up to April 2016)				
C1	<p>I am confused as to the mine being referred to as a small scale mine, yet it will have a 30 years Life of Mine?</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that the mine will only have one client, Vanchem. It will start as a small scale mine with only 30 employees and later increase to 50 employees. It will never reach the size of the platinum and chrome mines in the Steelpoort area, thus referred to as a small scale mine.</p>
C2	<p>Are there any wetlands on the application area? If so will it be mined as part of the mine schedule area?</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that there are several wetlands and drainage features on the application area corresponding to the Shakwaneng River and hill slopes. There are several drainage features channelling water from the mountains towards the river.</p> <p>An Aquatic Ecology Impact Assessment Study is being conducted as part of the specialist studies for the EIA study. The assessment includes identifying any wetlands, its delineation and it will also</p>

				<p>characterise the wetlands and its importance.</p> <p>The Dr Eiselen Dam and wetland in the southern extent of the application area will not be damaged.</p> <p>Any wetlands identified within the mining schedule area will need to be conserved as they control the flow of rainwater/drainage from the mountains into the river. It will be delineated and buffer zones recommended.</p> <p>A flood line determination of the Shakwaneng River will also be undertaken as part of the Surface Water Impact Assessment.</p>
C3	<p>Will there be any mining activities through the river?</p> <p>The mine layout plan must include all infrastructures and the mine schedule plan for the entire mining right. This is the only way DWS can determine that all water uses are identified and included on the WULA.</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that there will be 1 permanent haulage road on the farm Geluk 512KS which will be constructed. The road will cross the Shakwaneng River once.</p> <p>There is a mine infrastructure plan for the farm Geluk which indicates where the haulage road will cross the river. An infrastructure and mine plan for the Mining Right area will be included in the EIR.</p>
C4	<p>With what will the mine contractors backfill the mine pits? The overburden or waste rock?</p> <p>DWS has no issue if the overburden is used for backfill, yet if the waste rock (ore fines) which has been in contact with explosive are used to backfill there would</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that the mine pits will be backfilled with the ore fines left from crushing and screening and the overburden. The mine engineer has indicated that the overburden would be stored next to the mine pit. All the ore blasted will be crushed and screened and taken to the Final</p>

	<p>be certain issues.</p> <p>A leachate test would need to determine the potential for contamination from the fine ores (waste ore). The test should not pertain to the overburden but the waste rock to assist DWS.</p>	Catchment Agency		<p>Product Stockpile for shipment to Vanchem. There will be ore fines left after crushing and screening that will also be backfilled into the pit as part of rehabilitation.</p> <p>A Geochemistry Assessment is being undertaken as part of the specialist studies.</p>
C5	<p>I am not sure if Naledzi is going to facilitate the appointment of other specialists as well, but we would like to have inputs in the Terms of Reference for the specialist studies.</p>	Mr Donald Lithole Limpopo Heritage Resources Agency (LIHRA)	Key Stakeholders Workshop 4 December 2015	<p>Marissa Botha from Naledzi Group indicated they do facilitate the appointment of specialists. It has already been done for the project. Furthermore the Draft Scoping Report and Plan of Study for EIA was hand delivered to all the authorities and state departments including LIHRA for review and comment in August 2015. The report included the Terms of Reference for Specialist Studies which was available for inputs. We received no inputs in this regard.</p> <p>The specialists are currently in the field and will be drafting their reports. If there are any issues that need to be taken into consideration it can be conveyed to them. This is also the objective of the KSW at this stage, as no inputs were forthcoming during the Scoping Phase.</p>
C6	<p>It has been indicated that there are 25 Chiefs with joint jurisdiction on the proposed mining right area. I believe that each and every one has their own cultural believe system that is unique. LIHRA would require the inclusion of an Anthropological Assessment as part of the Heritage Impact Assessment.</p> <p>There may be rituals and cleansing of the site and</p>	Mr Donald Lithole LIHRA	Key Stakeholders Workshop 4 December 2015	<p>Marissa Botha from Naledzi Group indicated that the proposed mining right area is state owned and under management by Limpopo DRDLR. It has been allocated to three tribes. Rakhoma Mining Resources have been in direct consultations with the tribes and chiefs affected by the project.</p> <p>Mbavhi Ngobeni from Rakhoma Mining</p>

	<p>graves by these 25 main role players that need to be assessed and considered. If it is not considered and addressed it can cause unnecessary community issues.</p>			<p>Resources indicated that all the chiefs are familiar with one another. They are related as some are brothers and both chiefs for example. Unfortunately the chieftaincy is not as structured as in other areas in that there is a paramount chief and indunas. Their structure is not that clear at this point.</p> <p>As a company we took the approach of an all-inclusive consultation strategy. We are more than willing to engage with all the chiefs of the area. But it terms of the project site only 3 tribes have allocation rights to the farms and have the right to use the land. These are the directly affected chiefs.</p> <p>The farm Geluk 512KS is purely government owned. But the farm Ironstone has been gazetted and allocated to the three tribes. Rakhoma would then bring in those three chiefs and the Department of Rural Affairs in terms of what they would require to step into a lease agreement Rakhoma and Rakhoma with the tribes. We would therefore enter into an agreement with the three chiefs, but the other chiefs are purely part of an all-inclusive consultation to ensure that nobody feels left out.</p> <p>Mrs. Botha added that consultations with the chiefs are still ongoing and conducted in a one on one basis between Rakhoma and the community/ chiefs representatives. Naledzi Group has not had any focus group meetings with the structures as we await a go ahead</p>
--	---	--	--	--

				<p>from them to consult them in terms of the EIA process. We are trying to honour their structure of consultations. We hope by January 2016 the chiefs would give consent for us to engage with the them and community.</p> <p>In terms of your request for an Anthropology Assessment, Mr Eric Mathoho is the appointed Heritage Specialist. Naledzi Group will discuss your request with him for inclusion as part of the assessment.</p>
C7	<p>I think in this projects case you need to distinguish between Landowners and Land users which are on site. There may be people who previously lived / used the site who no longer live on site anymore. If we make the mistake on consulting the wrong parties there is a risk.</p> <p>At Medupi Power Station, the consultants focussed on the people who were occupying the site at the time and took a blind side on people who resettled from the site to another area. Those resettled people come back to their land to find the proposed power station. We must try to counter such things.</p>	Mr Donald Lithole Limpopo Heritage Resources Agency	Key Stakeholders Workshop 4 December 2015	Ms Mbavhi Ngobeni from Rakhoma Mining Resources noted the comment.
C8	How far does the ore reserve or deposit stretch on the proposed mining right area? It is indicated that mining will take place in strips of 20 wide and a maximum depth of 20m. But to what extent will the area be mined?	Mr Donald Lithole Limpopo Heritage Resources Agency	Key Stakeholders Workshop 4 December 2015	<p>Marissa Botha from Naledzi indicated that the ore deposit has been estimated and confirmed to occur on the entire farm Geluk 512KS. The ore body is close to surface, thus a surface mine is proposed.</p> <p>There are areas where the ore body outcrops on the farm or is either 3m below surface.</p>

				<p>The resource estimation was however done only for the farm Geluk and the life of mine (30 years) is based on Geluk farms resource estimation.</p> <p>The farm Ironstone 847KS has not been explored yet.</p>
C9	Is there any other mines operation in the area with mining rights on the application area?	Mr Donald Lithole LIHRA	Key Stakeholders Workshop 4 December 2015	<p>Mbavhi Ngobeni from Rakhoma indicated that it depends on the minerals available on site. Rakhoma conducted a study to determine whether there were any other minerals available on site aside from iron ore. Yet when there is a reserve of iron ore there are no other by products/minerals like with platinum and chrome.</p> <p>DMR indicates to applicants on their application acceptance letters if there are any other stakeholders or applicants on the property which need to be consulted. When DMR accepted Rakhoma's application for Mining Right they did not specify any other applicants on the property which need to be consulted. So far Rakhoma are the only right holders of the iron ore on the application area.</p> <p>Marissa Botha from Naledzi Group added that as part of the public participation process other mines of the local area are being consulted. You would find that already</p>

				<p>established mines in the area usually have mining rights on other properties in the regional area.</p> <p>If referring to the KSW invitee list, other mines of the local area were invited to determine if any of their rights are affected or potential infrastructure plans.</p> <p>Mbavhi Ngobeni added that the closest mine to the application site is approx. 15km.</p>
C10	<p>There are two tree species that will occur on the application area nl. <i>Cartha Edulis</i> and <i>Cartha Transvalensis</i> (<i>Lydenburgia assinoides</i>). Please note these two species are confined to the Sekhukhune Mountain lands. DAFF will need a report indicating the potential impact on these trees.</p> <p>Please also note that license permits are mostly valid for 2 years.</p> <p>Yes it would be acceptable to apply in phases but the report must state the holistic impact on these species.</p> <p>We are also concerned of the impact on natural forests that may occur on the application area. This needs to be identified and addressed in the specialist ecological assessment.</p>	<p>Thapelo Machate Department of Agricultural, Forestry and Fisheries (DAFF) Forestry Regulation</p>	<p>Key Stakeholders Workshop 4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that an Ecological Impact Assessment is being undertaken as part of the EIA study which will determine the impact of the mine activities on the protected trees, vegetation, determine if there are any natural forests.</p> <p>Can it be suggested that permits are applied for in phases according to the mining schedule?</p> <p>Mbavhi Ngobeni added that it can be included in the operational phase for the EMPr that permits are only valid for two years and can be applied for in phases.</p>

C11	<p>It is indicated that the mine will have 30 employees in its initial mine production and later increase to 50 employees. Where will the mine source water for these employees?</p> <p>Please make sure that the water you apply for at DWS will sustain your water requirements for the entire life of mine. DWS do not easily amend the water use license permits. Do not apply for low volume of water if you know you will require high volumes in 20 years time. Apply for the bulk requirement foreseen to be required for the life of mine from onset.</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha from Naledzi Group indicated that the mine will source water from boreholes to be drilled on the farm Geluk 512KS for domestic purposes. It is indicated in the Mining Works Programme that the mine requires 3000 litres per day for these purposes.</p> <p>Mr Vongani Mathebula, Mine Engineer for Four Arrows Mining Engineers (also mine contractors) indicated that they intend drilling 2 boreholes in the 1st year of operation. Accordingly 2 JoJo storage tanks will be set up to store the water. The borehole water will be used for domestic purposes, drilling activities and dust suppression.</p>
C12	<p>How will the mine contractor provide sanitation on site?</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Vongani Mathebula from Four Arrows Mining Engineers indicated that the entire mine will be operated by different contractors. Four Arrows intend using mobile chemical toilets for sanitation for example Talisman Hire mobile toilets.</p> <p>The mine process will consists contractors for each activity:</p> <ul style="list-style-type: none"> • Drilling and blasting • Loading and hauling • Crushing and Screening and take product to the final product stockpiles

	<p>Please note that DWS wants a copy of the service agreements Rakhoma or the mining contractor will have in terms of sanitation etc or for any services in this regard. We don't want to find that you indicate at the meeting a service provider will provide chemical toilets and remove effluent to a waste water treatment plant and find that the effluent is dumped and polluting the river.</p> <p>When do you anticipate submitting the Application for Water Use License? Only by the time Rakhoma receives their Environmental Authorisation from DMR?</p>			<ul style="list-style-type: none"> • Transportation of the product to the Roosekenal Railsiding. • Sanitation provision • Mobile offices etc <p>Marissa Botha from Naledzi indicated that the WULA will be prepared and submitted by end of April 2016. Once the Draft EIR is available the WULA will be prepared based on the water uses stipulated in the report and mine infrastructure plan.</p>
C13	<p>Let me just explain why the proposed Geluk Mine will and is going to be rather small and has limited potential of becoming a large scale mine.</p> <p>The product Vanchem / Rakhoma is looking for is the vanadium in the iron ore. At the moment Vanchem is supplied by Mapochs Mine at Roosenekal. Mapochs Mine is a larger mine, that what Rakhoma is proposing, yet still a smaller scale mine. Mapochs currently supplies Evraz Highveld Steel and Vanchem. In South</p>	Mbavhi Ngobeni Rakhoma Mining Resources	Key Stakeholders Workshop 4 December 2015	Noted.

	<p>Africa this product only has 3 potential customers:</p> <ul style="list-style-type: none"> • Vanchem • Highveld Steel • Rhovan <p>Rhovan has their own mine known as Rhovan Vanadium Mine (Xstrata Alloys) in the Brits Area.</p> <p>So the material will only go to one potential customer which is Vanchem and can therefore never really grow into a big mine operation. The chance of this market also growing is very limited.</p> <p>The reason also for the proposed Geluk Mine being small in its initial stages is that Vanchem currently still has a supply agreement with Mapochs Mine which cannot be stopped for the next 5 years. The supply agreement must first expire. Only once the supply agreement with Mapochs Mine expires can Geluk Mine fully supply Vanchems ore requirements.</p> <p>It will be evident from the supply tonnages set out in the Mining Works Programme that for the first 5 years of Geluk Mine operation the tonnages would be 240 000 tons/annum. After year 5, the contract with Mapochs Mine would have ended then Rakhoma through Geluk Mine will supply Vanchem with their total ore requirement ramping mine production to 700 000tons/annum.</p>			
C14	<p>Just to get some clarity in terms of the Section 21 (b) water use license which pertains to Storing of Water:</p> <p>For what will Rakhoma require this Section 21 (b) water</p>	<p>Mr. Adam Ramalisa</p> <p>Department of Water and</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha indicated that water abstracted for the boreholes for domestic purposes will be stored in 2 JOJO tanks.</p> <p>Also, if according to the Geohydrological</p>

	<p>use?</p> <p>Will it be for borehole water stored in tanks or control dams?</p>	Sanitation, Olifants Catchment Agency		<p>Assessment being undertaken it is determined that during mining the contractors will mine into the groundwater table there would be a need to remove the water from the mine pit and pump it into control dams/dam.</p> <p>Yet the need for such is still to be determined by Geohydrology Assessment.</p>
C15	<p>I arrived later at the meeting. Can you just confirm with me where is this mine being proposed?</p> <p>Yes, I am familiar with the area and know where the application area is located now. Where will the electricity supply for the mine come from?</p>	Xander Neethling Eskom Distribution Northern Region: Land Development	Key Stakeholders Workshop 4 December 2015	<p>Marissa Botha indicated that proposed application area is located some 20km west of Steelpoort in the area of Jane Furse on the farms Geluk 512KS, Geluk Oos 513KS and Ironstone 847KS. When traveling on the R555 Steelpoort / Stoffberg Road there is a turn off to the left onto the D2219 Jane Furse Road with a Steelbridge over the Steelpoort River; once on the D2219 road you pass Maphopha village then you reach a large natural area on your left and right and side of the road which is the proposed application area.</p> <p>She indicated that in the initial stages of mining the mine contractor will use Diesel Generators for the office, weighbridge and workshop. The other components of the mine such as the Crusher and Screener plant are mobile diesel powered machines. The mine will require low electricity supply and usage.</p>

	<p>So during construction phase the electricity demand would not be high. What about during production?</p> <p>So Rakhoma's maximum required electricity supply would be medium voltage 22kV with a transformer.</p> <p>Has a substation required for the mine been included in the EIA process?</p>			<p>Later the mine would require an Eskom substation and infrastructure for the offices, weighbridge and workshop area.</p> <p>Vongani Mathebula of Four Arrows Mining indicated that the electricity requirements during operation would also be low. The mine will require electricity for the mobile office, weighbridge, and workshop area.</p> <p>Post Meeting Note: The EIA Study for the proposed Geluk Mine does not include the assessment of the required Eskom substation.</p>
C16	<p>Please note that we are also concerned whether there are any natural forests on the application area. We want Naledzi to also consider other legislation. We would like a site visit to the application area before making comment on the project.</p>	<p>Thapelo Machate Department of Agricultural, Forestry and Fisheries (DAFF) Forestry Regulation</p>	<p>Key Stakeholders Workshop 4 December 2015</p>	<p>Noted. Marissa Botha from Naledzi indicated that Naledzi is available for a site visit either in December 2015 or January 2016. The Draft EIR will be submitted for comment to DAFF by February 2016. When will DAFF be available for a site visit?</p>

	We would like to then conduct the site visit in February 2016 once we have received the Draft EIR for comment!			We will arrange a site visit accordingly.
C17	I would also like to request a site visit with the specialist conducting the Heritage Impact Assessment for the proposed project. Maybe the site visit can be conducted with the specialists.	Mr Donald Lithole Limpopo Heritage Resources Agency	Key Stakeholders Workshop 4 December 2015	Marissa Botha from Naledzi indicated that she would submit the request to Eric Mathoho who is the Heritage Consultant conducting the specialist study.
C18	<p>We have no objection to the EIA Process. We are concerned with the physical construction of the access road to the mine site.</p> <p>Limpopo Roads Agency will wait for the Traffic Impact Assessment (TIA) conducted as part of the EIA study. Once received we would issue the conditions for access road construction.</p> <p>There will be a traffic impact on the steelbridge over the Steelpoort River and the road infrastructure. We will review the TIA.</p> <p>Access road approval will be required from Limpopo Roads Agency.</p>	Phuti Montjane Limpopo Roads Agency	Key Stakeholders Workshop 4 December 2015	Noted. A Traffic Impact Assessment is being conducted as part of the EIA Study it focuses on both the new access road proposed to the mine, haulage route from the mine to the Roosenekal railsiding, including the Steelbridge over the Steelpoort River.
C19	Let it be clear that the applicant Rakhoma Mining Resources must sign the WULA application forms, include the ID of the company representative and details as requested as per the WULA pre-application meeting between Naledzi and DWS.	Mr. Adam Ramalisa Department of Water and Sanitation, Olifants	Key Stakeholders Workshop 4 December 2015	Marissa Botha from Naledzi indicated that the documents requested by DWS at the pre-application meeting have been gathered. We have indicated to Rakhoma that they must sign the forms.

	<p>DWS also requires some form of security of land tenure such as a title deed to be included as part of the WULA. If it is a lease agreement include any proof of application for such.</p> <p>Noted. If ever there is an application/request for or lease agreement with regards to the proposed Mining Right areas which indicated Rakhoma is trying to secure land tenure then a copy of such documents must be submitted to DWS.</p> <p>DWS would like to sit down with the applicant before the application is submitted. This will allow DWS to site with the applicant and unpack all the permits required for the project. DWS do not accept documents that are incomplete.</p>	Catchment Agency		<p>Mbavhi Ngobeni from Rakhoma indicated that Rakhoma cannot apply for a lease agreement from the Department of Rural Development Land Reform without the Mining Right from Department of Mineral Resources.</p> <p>Marissa Botha indicated that the WULA specialist/Naledzi along with Rakhoma the applicant will consult DWS through a pre-application submission meeting to come and discuss the drafted WULA to ensure that the document contains all the minimum requirements and is complete before submission.</p>
C20	Please also submit the details of the details of the Waste Management License as part of the EIR to DWS. Please also submit the comments received from other departments on the EIR to us so as to fast track the WULA process.	<p>Mr. Adam Ramalisa</p> <p>Department of Water and Sanitation, Olifants Catchment Agency</p>	<p>Key Stakeholders Workshop</p> <p>4 December 2015</p>	<p>Marissa Botha indicated that the Environmental Authorisation and Waste Management License is an integrated process and both are addressed in the EIR. The draft EIR will be circulated for public review and for comment to organs of state. A 30 day commenting period is provided for in terms of the new EIA Regulations 2014 time frame. Post the 30 days the comments</p>

				received from departments will be incorporated into the EIR as a final version and submitted to Department of Mineral Resources and also to Department of Water and Sanitation. We may also consider submitted the final report to Limpopo Department of Economic Development, Environmental and Tourism.
C21	<p>Please note that the D2219 Jane Furse Road is a district road to which building lines apply of 15m+20m from the centre line of the road.</p> <p>DMR must wait for the conditions of Limpopo Roads Agency before approving the Mining Right. The conditions of the road authority should be included in the Environmental Authorisation. The mine infrastructure must honour the building line of the district road. The building line is approx. 35-40m from the centre line of the road. Further the roads agency must approve of the access road position and design from the district road.</p>	Phuti Montjane Limpopo Roads Agency	Key Stakeholders Workshop 4 December 2015	<p>Noted. The Draft EIR which includes the outcome of the Traffic Impact Assessment will be submitted to Limpopo Roads Agency for comments and inputs. Any conditions will be included in the EMPr for the project. Such conditions/comments will be highlighted in the EIR for consideration as conditions for the Environmental Authorisation to be issued by DMR.</p> <p>Mbavhi Ngobeni from Rakhoma indicated that they are aware that the 77 trips by trucks per day for shipping ore to Roosenekal would be high. Rakhoma has discussed with Transnet the need to bring a railsiding closer to the proposed Geluk Mine. Hopefully these developments can take place by the time the mine ramps up to full production of 700 000 tons/annum.</p>
C22	My apologies for my late arrival. What form of sanitation would be provided at the mine?	Bridget Pilusa Sekhukhune	Key Stakeholders Workshop	Marissa Botha from Naledzi Group indicated that chemical toilets would be rented from

	We would need to determine if Jane Furse does have capacity for the effluent and also note that Jane Furse WWTP is not functioning well!	District Municipality	4 December 2015	contractors such as Talisman Hire. The effluent from the chemical toilets would need to be vacuumed from the toilets by vacuum trucks and be disposed of at the closest Waste Water Treatment Plant, such as at Jane Furse.
C23	How will the mine dispose of their domestic waste? Will the mine have a skip on site which they will remove on a weekly basis to the landfill site OR must the municipality collect and remove the waste to the landfill site?	Bridget Pilusa Sekhukhune District Municipality	Key Stakeholders Workshop 4 December 2015	Marissa Botha from Naledzi Group indicated that domestic waste could be removed to the Jane Furse Landfill site. It will be confirmed with the mine contractor if they would like the municipality to remove the waste or whether they would remove the waste themselves.
C24	Will the mine require an Air Emissions License (AEL)?	Bridget Pilusa Sekhukhune District Municipality	Key Stakeholders Workshop 4 December 2015	Marissa Botha from Naledzi Group indicated that the mine does not require an AEL. There will be no processing plants on the mine. A raw ore product will be produced and shipped to the customer, Vanchem Vanadium Products Pty Ltd in Witbank. Ore excavated from the mine pits will be loaded and hauled by dump trucks to the Run of Mine and go through a mobile Crushing and Screening plant for size reduction. No

	Sekhukhune District Municipality does have an air quality officer, but the provincial authority LEDET is still responsible for the issue of AEL.			washing of ore will take place or processing.
C25	The majority of the traditional leaders present at the meeting are supportive of the project and want it to proceed. He stated that as a community they are willing protect the Company.	Kgoshi Ratau	11 March 2016 Traditional Leadership Meeting	Noted.
C26	Rakhoma should come with its equipment and start working as the traditional leaders will ensure protection of all the equipment that the company brings to site.	Kgoshi Mogashoa	11 March 2016 Traditional Leadership Meeting	Noted.
C27	Rakhoma should communicate the commencement date, as this project has been in the pipeline for over 3 years without progress. The traditional leaders are willing to assist in that regard. The community is starving and this project would help them.	Kgoshi Masha	11 March 2016 Traditional Leadership Meeting	Ms. Ngobeni highlighted that she was not in a position to report on the commencement and would require instructions from the Rakhoma. It was recommended that traditional leadership confirm in writing their support for the project as this may become useful to Rakhoma.
C28	The traditional leaders are now united and want the project to start as soon as possible and where necessary they will enforce the law if anyone interferes with the project or trespasses the site. He further highlighted that it is necessary that the Company visits Kgoshi Mogashoa and discuss the concerns that he has.	Kgoshi Malekane	11 March 2016 Traditional Leadership Meeting	Ms. Ngobeni indicated that Rakhoma will endeavour to meet with the traditional leaders that were not present at the meeting namely Kgoshi Mogashoa and Kgoshi Maphopha.
C29	The traditional leaders would like to be informed of the developments on the project on a continuous	Kgoshi Seopela	11 March 2016 Traditional	Traditional Leadership and the community will be informed of the status of the EIA process

	basis, this would also assist to deal with any disgruntled members within the communities.		Leadership Meeting	and when the findings of the EIA study will be available in report format. The report is called an EIR and EMPr and will be made available to the community and traditional leadership for public review for 30 days. Also during this 30 days Naledzi Group will undertake further consultations with the community and traditional leadership.
C29	Rakhoma must make an effort to speed up the process as the community will lose faith in the traditional leadership as this mine has been spoken of for years. It was recommended that Rakhoma should commence with the fencing following by a sword turning event.	Traditional Leader	11 March 2016 Traditional Leadership Meeting	Ms. Ngobeni highlighted that the request raised will be taken back to Rakhoma and feedback will be given.
C30	What will be the consequences that will be caused by traffic during the operation of the mine?	Kgoshi Senamela		A Traffic Engineer has been commissioned to analyse the impact on traffic. The findings of the traffic analysis will be included in the EIR. Post meeting note: The proposed mine will result in a significant increase in traffic during both construction and operational phases. The local road network and surrounding network however have more than sufficient capacity for the increased traffic. Hence the impact on the roads system will be low. Yet the haulage trucks will need to cross the Steelpoort River via the Malekane Steelbridge. This bridge cannot accommodate mine haulage trucks and would need to be replaced with a two lane bridge. It

				is discussed in detail in the draft EIR Report under Section F - Description Biophysical Environment under the Traffic and Road Network discussion.
C31	<p>The application farms are still zoned agriculture. Rezoning of land is required to commercial/industrial use ito SPLUMA Act 16 of 2013. 2 applications need to be lodged, one in each municipal jurisdiction. The Sekhukhune Tribunal will decide over the rezoning application; alternatively Department of Co-Operative Governance.</p> <p>The study site is a green park area/public park at which surrounding communities conduct social and socio-cultural activities. The community collect firewood, wash clothes in river, perform Traditional Rituals in river, have pick nicks, take wedding photos and possibly also pray at site. The mine will have a negative impact on the social activities of the communities. The mine must find alternative park areas for the community. The mine must take social responsibility and create a park for the people if the current area is to be destroyed by mining. It must be indicated in the EIA Report / SLP how the mine intends to mitigate such impacts.</p> <p>The impacts on surface, groundwater, traffic, noise, air quality, heritage, economic, social and cultural resources must be assessed.</p>	Mr Dilikane Phasa Senior Manager: Town Planning Division Makhuduthamaga Local Municipality	Focus Group Meeting 21 April 2016	<p>Rakhoma has been informed of the need to lodge a rezoning application for the proposed change in land use required to commissioning mining on the proposed mining right area. This has also been highlighted in the EIR.</p> <p>Noted.</p> <p>The impacts on surface, groundwater, traffic, noise, air quality, heritage and cultural resources, economic, social have been assessed and addressed in the EIR and management measures have been incorporated in the project EMPr for implementation during the construction, operation and decommissioning and closure phase of the project.</p>

