

# Appendix 1-5 Minutes of meetings

# GLENCORE

## DMR PRE-APPLICATION MEETING GOEDGEVONDEN EA AMENDMENT

Date: 2 March 2022

Time: 10h00

Venue: Virtual Teams Meeting

### ATTENDEES:

<b>Name</b>	<b>Organisation</b>	<b>Designation</b>
Martha Seshweni	DMR	ASD: MEM
Tebogo Chauke	Glencore	Environmental
Marietjie Eksteen	Jacana Environmentals	EAP
Lizinda Dickson	Diphororo Development	Public Participation
Fransis Stoltz	Diphororo Development	Public Participation

### PURPOSE OF THE MEETING

- Goedgevonden Colliery (GGV) is an existing mine and operates under Mining Right No. MP 30/5/1/1/2/169 MR
- Resource Optimisation requires an amendment of the EA and EMPr
- In our pre-application meeting of 27 November 2020, we agreed on:
  - the required specialist studies
  - the Public Participation Plan
  - the Section 102 application
- With the finalisation of the scope of changes and detail project description, the final process for the amendment was determined through a legal review

### SCOPE OF CHANGES

- Introduce additional mining areas that have now become economically viable
- Change the mining methodology in certain areas, from opencast to underground
- Include additional infrastructure requirements for the underground mining
- Revise the re-alignment of P53-1
- No new listed activities are triggered; however, a change in the nature and level of impact is anticipated
- Apply for a Part 2 Amendment in terms of regulations 31-33 of the EIA Regulations

### SCOPE OF CHANGES

- i. Additional underground areas have been included along the northern, western, and southern boundaries of the farm Goedgevonden 10 IS.
- ii. The southwestern corner of the farm Goedgevonden 10 IS will now be mined via underground methods, previously approved for opencast.
- iii. A small portion situated to the south of the CHPP will be mined via underground methods, previously approved for opencast.
- iv. A portion of the northern part of Goedgevonden 10 IS, associated with the old Ogies Underground Mine will now be mined underground instead of opencast.
- v. The main Zaiwaterspruit river diversion running through the centre of Goedgevonden 10 IS will be undermined.

- vi. The eastern underground block on the farm Grootpan 7 IS has increased in size, whilst the southern underground block has decreased slightly.
- vii. The unnamed tributary of the Zaiwaterspruit on the eastern boundary of Zaiwater 11 IS and its associated wetland system will be undermined.

#### **AMENDMENT PROCESS**

- Change triggers no new listed activities
- EA amendment required for a change in scope that results in change in nature of impact
- Within 90 days submit a report reflecting:
  - Assessment of impacts
  - Advantages & disadvantages
  - Mitigation measures
  - Changes to EMPr
- Report subjected to PP process of at least 30 days

#### **AMENDMENT SCHEDULE**

The schedule was delayed due to Covid-19 disruptions, the finalisation of the final mining schedule and infrastructure requirements, and additional specialist studies conducted in support of the scope changes (e.g. geotechnical assessment)

Activity	Planned timeframe
Finalisation of mining schedule and layout	February 2022
Specialist studies	March 2022
Amendment Report and EMPr review	March/April 2022
S102 Application	Late April 2022
Commenting period (30 days)	May 2022
Focus Group meetings	Mid May 2022
Submission of final Amendment Report and EMPr	June 2022

#### **COMMENTS / QUESTIONS**

Question / Comment	By whom	Answer	By whom
I need clarification on the underground mining seams, was this approved before or whether this is a new listed activity or not.	Martha Seshweni	No, that is a new activity that will be added, thus the need for an amendment to the EA and EMPr. It will also be addressed through an amendment to the Water Use Licence (WUL).	Marietjie Eksteen
Will this trigger a listed activity as it has not been approved before? Does the extension of the mining area not trigger a listed activity?	Martha Seshweni	Because it is underground it does not trigger a known listed activity.	Marietjie Eksteen

It was not part of the original application.	Martha Seshweni	Agreed, an amendment to the EMPr and the EA needs to be done to include these areas.	Marietjie Eksteen
The extension will also influence the SLP, additional areas will be calculated by mine economics and the report will need to be adapted.	Martha Seshweni	There will be a change in scope, the mining area will be extended, the methodology will change but none of that trigger or constitute a new listed activity that has not previously been approved. That is why a part two amendment can be followed.	Marietjie Eksteen

#### **WAY FORWARD AND CLOSURE**

Ms Seshweni explained that she will need to investigate the matter and will revert as soon as possible.

Ms Eksteen thanked Ms Seshweni for her time and the meeting was closed.

# GLENCORE OPERATIONS SA (PTY) LTD

## GOEDGEVONDEN COMPLEX

### PUBLIC PARTICIPATION FOR THE AMENDMENT TO THE MINING RIGHT, ENVIRONMENTAL AUTHORISATION AND ENVIRONMENTAL MANAGEMENT PROGRAMME

**DMR Ref No:** MP 30/5/1/2/2/169 MR

**Applicant:** Glencore Operations SA (Pty) Ltd: Goedgevonden Complex

**Location:** eMalahleni Local Municipality of the Nkangala District Municipality, Mpumalanga Province

**Environmental Assessment Practitioner:** Marietjie Eksteen, Jacana Environmentals cc (EAPASA Reg. No. 2020/1800)

**Public Participation Officer:** Lizinda Dickson, Diphororo Development (Pty) Ltd

### FOCUS GROUP MEETING

#### Meeting Note

Two focus group meetings were scheduled for 24 August 2022. The first meeting was scheduled for all GGV registered organisations from the Ogies area and the second for those registered organisations in the Phola area. A request was made by the stakeholders to rather have one combined meeting.

The combined meeting was scheduled as follows:

**Date:** 24 August 2022

**Time:** 9h00 – 14h00

**Venue:** OakhouseLodge, Farm Grootpan, Ogies

Invitations were sent out to the identified participants on 2 August 2022, and an update after the above request on 17 August 2022. No further special requests were received. The following parties were invited to the combined meeting:

Name	Surname	Organisation	Confirmation
Greyon	Bhila	Unstoppable Youth Forum	Yes, attending
Jan	Bulunga	Phola Ogies Rural Mining Forum Coal Community Cluster	Yes, attending
Thandeka	Buthelezi	Ogies	Yes, attending
Petty	Gube	CIr Ward 30	Yes, attending
Aida	Gumede	GGV Village	Not confirmed
Nelisiwe	Kena	Mafufela Village	Yes, attending
Millicent	Lukhele	BCC	Yes, attending
Dora	Mabena	CIr Ward 28	Yes, attending
Souto	Mahlanga	Springboklaagte community	Yes, attending
Pinky	Mahlangu	Bombardie 2	Yes, attending
Chief Siphon	Mahlangu	Ndzundza SoGutjhe	Not confirmed
Nelson	Mahlangu	Unemployment Forum Siyabonga	Yes, attending
Queen	Mahlangu	Ndzundza SoGutjhe	Not confirmed
Phumlani	Malemela	Cologne	Yes, attending
Betty	Maphoa	CIr Ward 31	Yes, attending
Gugu	Mashimimi	Mafufela Village	Yes, attending
Agness	Mavimbela	Consortia Sky	Yes, attending
Sbusiso	Mbatha	Massive Movement	Yes, attending
Leonard	Mbonani	Cologne	Yes, attending
Nkosinathi	Mbuyisa	Ogies	Yes, attending
Innocent	Mdlaose	Ogies	Yes, attending
Danny	Mnisi	Community Previously Disadvantaged United Forum	Yes, attending

Name	Surname	Organisation	Confirmation
Khawulani	Msibi	Ogies	Yes, attending
Thamsanqa	Msumba	BCC	Yes, attending
Phumzile	Mthimunye	Phola Movement (POSA)	Yes, attending
Bheki	Mtshali	Ward 28 Committee	Yes, attending
Thembeke	Ndakiswa	Women in mining	Yes, attending
Themba	Nhlapho	Nhlapho Family	Yes, attending
Solomon	Nkabinde	OPTA	Yes, attending
Nontokozi	Nkabinde	Women in mining	Not attending
Andile	Ntshangase	Ogies	Yes, attending
Mpilo	Nxumalo	Ogies	Not attending
Yvonne	Phila	Phola Amalga	Yes, attending
Ernestina	Rankadi	Makause	Yes, attending
Neo	Sambo	Unstoppable Youth Forum	Yes, attending
Anna	Shezi	Springboklaagte community	Yes, attending
Sfiso	Shezi	Springboklaagte community	Not attending
Sibusiso	Shongwe	Ward 31 Committee	Yes, attending
Selina	Sifawa	Makause	Yes, attending
Njabulo	Siwela	Ogies	Yes, attending
Francisco	Vilanculo	Siyabonga One	Yes, attending
Given	Yika	Ogies	Yes, attending
Vincent	Zukwane	Siyabonga One	Yes, attending
Rep		Ndzundza SoGutjhe	Yes, attending
Rep		Ndzundza SoGutjhe	Yes, attending

An attendance register was filled, but taken by stakeholders. Below photos of the meeting.



At the meeting a presentation was distributed which was taken by all participants (see under item B below). The presentation summarized the findings of the basic assessment report.

The stakeholders demanded that DMRE be invited and attend these meetings to ensure the community's issues are heard. It was explained that all documentation is submitted to DMRE, but stakeholders did not feel comfortable to continue with the meeting without DMRE's presence. Under Item A below is a direct transcript of what transpired in the meeting.

## **A. Transcription**

00:00:06 Welcome to everyone and thank you for honouring and coming to this session. I know to some of you, it has been short notice, but to others, it has been a long-standing issue. Some of you have been much aware of what is happening and the reason why we are here today. (Gracious Maswanganyi)

00:00:43 Maybe before I go to why we are here today, I just want to do an introduction from our side. After that, I will go to the purpose, and after that I will allow our AGM, our Assistant General Manager. I think we are all familiar with our AGM for GGV. (Gracious Maswanganyi)

00:01:15 So from my side in terms of introduction, I will start with myself, my name is Gracious Maswanganyi, I am the Stakeholder Management for Glencore Group. With us today, we have Mr Sabelo Guma, if he can just wave his hand. He is the Assistant General Manager at GGV. We have Elmien Web, she should be joining us later, she is from Environment Group. Then we have Tebogo Chauke, she is the Environmental Manager at GGV. Then we have Mlungisi Masilela, he is responsible for Health Safety and Environment Manager at GGV. We also have Busisiwe Madaleni, that you are very much familiar with. We have Simon Havenga, responsible for the Open Cast. (Gracious Maswanganyi)

00:02:28 Then we have from the company that is assisting us, which is a specialist company in terms of consultation on public participation that relates to what we are currently doing. I am going to start with Ms Marietjie Eksteen, Lizinda Dickson, then we have Lucky Ngale, and then we have as well Fransis Stoltz at the back. (Gracious Maswanganyi)

00:03:04 In terms of the presentation for today that is the team that we have that will assist one another for the proceedings for today, so before we go any further, I think I am not necessarily going to give each and every person here to introduce themselves, but as we enter in taking questions, I am asking request to say who they are and where we come from and then we ask questions as such. (Gracious Maswanganyi)

00:03:46 So the reason why we are having this session is that it is part of the public participation and the engagements that need to happen because, as a company, we have the role and responsibility to consult further and wider in terms of anything that we do within the community, especially that affects the community within the area as well as the environmental impact which is a mandate and legal requirement within our government legislative. This is the main reason we are here today. (Gracious Maswanganyi)

00:04:21 Also, we acknowledge as a company that we need to abide by certain rules and regulations that are stipulated and also the fact that we are guided by DMRE, so there are certain things that we need to abide by according to regulations. But from us as a company, we believe that you are a citizen in Phola and Ogies and have a role and responsibility to ensure that we are open with our communities in terms of everything that we are doing. (Gracious Maswanganyi)

00:05:19 So without any further ado, I am going to ask the Assistant General Manager to just give a welcome and then we will go straight into the business of the day. (Gracious Maswanganyi)

00:05:38 We need to have representatives from DMR and the Municipal Manager in this meeting. (Stakeholder)

00:07:20 Ok, so I think before we move further, in terms of the LED Manager, I am just going to allow the person who is certain in terms of the process because the process started with an advert to explain further. (Gracious Maswanganyi)

00:07:45 So, in terms of the Municipality, the people who were included in the invitations were the ward councillors and the ward committee members, but as Gracious said, the process started quite some time ago with an advert that was placed and notices were sent out apart from this meeting, we also sent the background information document and the documents to the LED Manager at the Municipality as well as to DMRE to review what we are doing. And even the record of today's meeting will be submitted to DMRE regarding what the concerns and comments are from the community. So, it is a process, not just a once-off. Even after today, there will be an opportunity for further comments from yourself on the process that will also go to DMRE as part of our overall report. (Lizinda Dickson)

00:08:41 We need DMR and all CCF members in this meeting. (Stakeholder)

00:09:11 So there is a difference between CCF and this meeting that we are having here. CCF is separate, so maybe we should not use it as a reference. So, this one is part of the process of consultation. There is a number of consultations that happens. You will find there is the first consultation, there is a second consultation and so on. So, this one is a Focus Group that focuses on a specific group. There are other engagements even before we get to the final end of the documentation. The DMRE is aware of this meeting, but there is no legal requirement for them to be here. What happens here today must be captured for them. Even if there is any submission here from anyone via e-mail via Busisiwe, it will be submitted to them. (Gracious Maswanganyi)

00:10:17 People to answer our questions from Glencore are not here. What if this meeting is not going to present our concerns at DMR as we are presenting them? (Stakeholder)

00:10:50 As Lizinda has indicated, this process of Public Participation in relation to the road amendment is not a legal requirement for DMRE to be here. Today we are just here to do a Focus Group Meeting for representatives of Ogies and Phola communities to give them an update on work that needs to be done. It is not a legal requirement that DMRE must be here. (Tebogo Chauke)

00:11:35 I think the responsibility we have is to inform the community of what information because it is your objective outside of anything that you know. It becomes fruitless in a way. So the DMRE requires the question that they ask us if we had a meeting to make the community aware of exactly what we need to do or what the impact is in terms of everything. That's why even after this meeting, you don't have to accept what the meeting says or what the outcome is. You have a right to object or



make recommendations and inputs, which will also be submitted to DMRE. Which then, DMRE will take it further in terms of what's itching. If we have not explained what this is about, the first question by DMRE will be if it was explained what it entails and what the impact will be. Can we maybe pass on that one? I'm not sure if maybe that is part of a specific one. (Gracious Maswanganyi)

00:12:33 We don't know if the Municipality is part of this process. If some of us do have the information, what about the rest of the people? Is this process ongoing, or will this be the last consultation meeting? (Stakeholder)

00:13:51 On this process, we are not here to force you to agree on this amendment process. You can object. We have to note every little comment made here today, and those comments must form part of our report. So, we cannot submit our amendment without your comments or objections. (Tebogo Chauke)

00:14:23 Tomorrow the community will be blaming us for something we never agreed on. It is better not to hold this meeting and wait for the broader community. (Stakeholder)

00:14:29 The process; first notice, some of you will be aware of the notice that has been sent out to announce our application. Then we received some comments from you that we had to put into our reports. This is a certain process where we sit down with you, and then we still have to put your objections and comments and submit them to the DMRE in our report. (Tebogo Chauke)

00:15:11 The way you are putting it, tomorrow things happen not the way we presented in the meeting because that happened before that we raised issues and nothing happened, or things are not said as we presented them. (Stakeholder)

00:15:24 I think as part of our journey, we wanted to invite you to this meeting to use this platform to iron out our differences. We would not have known your concerns if it was not for this platform. However, I would like us to calm down so that we can assure you that this process is transparent. I would like you to allow my colleagues the opportunity to explain the process, we will listen to your concerns, and we will address the issues. It is not a matter of who wants to be right and who wants to be wrong. If you can allow us to please explain the process. (Sabelo Guma)

00:17:36 Before I start to explain the process, maybe I can just give an understanding that we (myself, my team and Marietjie) are independent consultants running this process. The purpose of this meeting is that there has been an identification of some amendments that are needed in terms of the Environmental Management Act on the existing operation. And the process that then needs to be followed is dictated by the EIA Regulations, to say that we need to provide opportunity and provide information to stakeholders in terms of the application. So, what we are doing here today is to provide you with an opportunity for you to hear what those amendments are as well as what the possible impacts will be from those amendments. You then have an opportunity to ask us questions that we will attempt to answer in terms of the

amendment. But you are also free to submit additional comments up until the 12<sup>th</sup> of September 2022. So, these processes are dictated and regulated by the law that we have to follow. All of the comments that we receive in written form are submitted as is. If you write us a letter, we submit that letter just like that to DMRE. We don't change anything. We do incorporate it into what we call a Comments

Report, where all the comments are listed, and that report is again a public document. You can review it, you can say it is not a true reflection of what the comments were, and you can object to it directly to the DMRE, giving your reasons for your objection. This is not a meeting where we need to take decisions. It is a meeting where we really want to provide you with information on the process as well as the amendments, the impacts, and the mitigation measures and hear from you if there are any questions or comments and even allow you to have additional comments. And all of that will then be submitted to DMRE. It is a transparent process where any time after this meeting you want the minutes, we can make them available to you. You can have comments throughout the process, and all of that will be submitted by us to DMRE as independent practitioners that are dealing with the regulations and the law for this process. I want to ask that in your minds just for today that you separate all the issues that you are dealing with, with GGV from the amendment process we are running because this is a meeting where we want to provide you with important information. I know that there are a lot of other issues, but you have structures and channels through which you can deal with that with Glencore, but for today allow us to provide you with the important information so that you can also participate in any of the changes that are planned. I am kindly requesting that you give us an opportunity, and then if at the end of the meeting you still feel the same, you are welcome to raise this with DMRE and us in writing, and we will submit that with our documentation. (Lizinda Dickson)

00:21:30 Maybe you can give us clarity on the way forward on the Section 102 application. (Stakeholder)

00:21:52 The meeting was stopped by Gracious to ask everyone to stand as Chief Mahlangu, and the Queen entered the meeting.

00:21:58 As I said we need clarity on the way forward on the Section 102 application. As lay people we are requesting that professional people at DMR come and clarify us if the amendments done are correct or not. Let's put the interest of the people first. (Stakeholder)

00:23:19 Thank you, I think that is part of the first part of our presentation to explain exactly what the amendment is and where the Section 102 applications come in. So, if you can give us an opportunity to start with the presentation, we have maps where we can indicate the exact areas. Then you can specifically interrogate those things on which you've got questions regarding the Section 102 application. I think if you give us an opportunity to start and just provide you with the information, we will allow a lot of time for questions then you can interrogate those things in detail. (Lizinda Dickson)

00:24:05 We need to hold a broader community meeting first. (Stakeholder)

00:25:30 We understand that you want the DMRE and Municipality to be part of this meeting for you to set out your grievances and comments. (Gracious Maswanganyi)

00:26:20 I hear that you want DMRE to hear your grievances and your concerns around this process, and as I have mentioned before, all comments that are made, even those mentioned before now, will be submitted to the DMRE and be made available publicly to the Municipality

as well. So, they will get an opportunity to review everything that has been said in this meeting and all the information and the questions that you have asked. For the sake of progress and moving forward, I am humbly requesting that we continue and provide you with the information we then take note of the concerns raised, and we can then discuss the way forward at the end of the meeting. (Lizinda Dickson)

00:27:08 Sorry, there was a request to hold the meeting with the community first. (Stakeholder)

00:27:29 This is not an application for a new mining right. It is an amendment to the environmental authorisation. It is an existing mining right. It is an amendment to the current mining right that we have. So we want to show you where the amendment is and how it is going to impact. (Gracious Maswanganyi)

00:28:03 We are requesting that the DMR is present at this meeting. We want them to hear our objection because we are going to do that. (Stakeholder)

00:28:38 Ok so that is your request so. I am going to allow a 5-minute caucus between Glencore, that we will come back after 5 minutes. (Gracious Maswanganyi)

00:29:05 So we did caucus, and we are sure you also caucused, so I will give feedback on our caucus and then you can give us feedback on your caucus. We thought it proper to give you the process in terms of how public participation happens, which is signed by DMRE, so that we are all on the same page. In terms of what needs to be done in this process and what it requires us to do. (Gracious Maswanganyi)

00:30:02 On our caucus, we request that you engage with the entire community, not just committees. The soccer field needs to be used for such a meeting. (Stakeholder)

00:30:46 Ok, so I think in terms of our processes, we have agreed to work with representatives of communities, with whom we meet frequently, whether it is CCF or now, they are representatives of structures that is the reason why we sent them the e-mail, we all signed the Terms of Reference to say that we are the leaders of the different structures, that we recognise and that we are working with. (Gracious Maswanganyi)

00:32:00 What are we about? We really and truly respect you. It is important that you allow us to share the information. Then at least you know what it is all about. Because we currently have a mining area that we want to extend, we just want to share the information with the community. If you could just listen to the process, you will see that it is transparent, if you can just allow us to explain what this is all about. Then you can dispute what you know. (Sabelo Guma)

00:33:40 The communities of Emasakhane, Ogies and Phola agreed that this meeting must be held with the entire communities. (Stakeholder)

00:33:42 The community decided to leave the meeting.

## **B. Presentation Distributed**

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### **Goedgevonden EA Amendment**

**Focus Group Meeting**

24 August 2022

#### **AGENDA AND PURPOSE OF MEETING**

2

1. Welcome and Introduction
2. Meeting procedures
3. Background on the amendment application for Goedgevonden Complex
4. Outline the legal process followed
5. Discuss the impacts and benefits of the project
6. Discuss the potential mitigation measures to limit the impacts
7. Obtain inputs from the stakeholders on the amendment application



24 Aug 2022

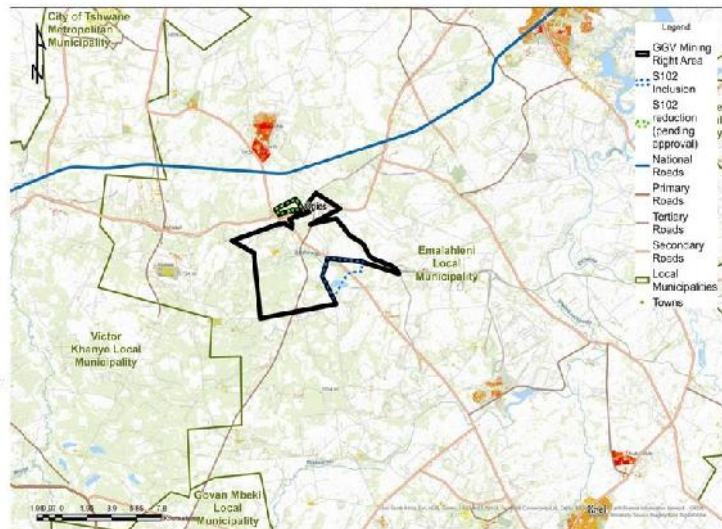
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## BACKGROUND AND LOCALITY

Goedgevonden (GGV) Complex is an existing mine that operates under Mining Right No. MP 30/5/1/1/2/169 MR and has an approved Environmental Management Programme (EMPr), approved by the DMRE in 2016.

African Rainbow Minerals Coal Proprietary Limited (ARM Coal) and Glencore Operations South Africa Proprietary Limited (GOSA) own and operate GGV through an unincorporated joint venture in which ARM Coal and GOSA hold 51% and 49% participating rights, respectively.

GGV is located approximately 50 km southwest of eMalahleni, and 38 km east of Delmas. The town of Ogies is situated directly north of GGV. It falls in the eMalahleni Local Municipality of the Nkangala District Municipality, Mpumalanga Province.



24 Aug -st 2022

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## MEETING PROCEDURES

### 1. Logistics

- Emergency exit & assembly point
- Attendance register
- Ablution facilities
- Refreshments

### 2. Ground rules

- Respect for each other and other people's opinions
- No personal attack – discuss the issue not the person
- Allow presentation, there will be enough time for people to ask questions
- Cellular phones off or on silent
- State your name and organisation when asking a question for record keeping purposes
- Direct all questions through the meeting facilitator
- Ask one question at a time, enough time will be allowed for questions to be heard
- Refrain from asking repeat questions

24 Aug -st 2022

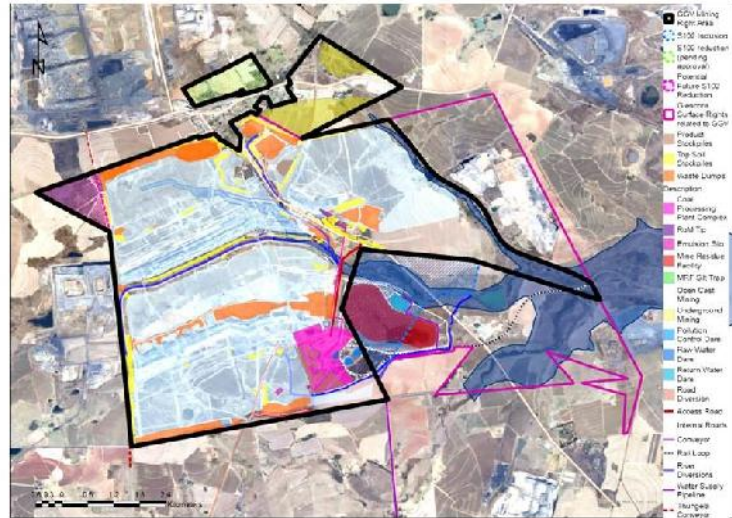
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## BACKGROUND AND LOCALITY

GGV is essentially an opencast mine, mining seam 2, seam 4 and seam 5 coal on portions of the farms Goedgevonden 10 IS, Zaaivater 11 IS and Kleinzuikerboschplaats 5 IS.

Coal mined at GGV is beneficiated on site and the mine supplies coal both to Eskom for power generation and to the export market.

Underground mining was approved on portions of the farm Grootpan 7 IS which is still to be developed.



24 Aug -st 2022

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## PROPOSED AMENDMENT

Recent optimisation of the mineral resource within the Mining Right area (MRA) resulted in a change to the mining schedule with the introduction of additional mining areas previously excluded from the mine plan:

- Introduce limited additional mining areas (underground) that have now become economically viable.
- Change the mining methodology in certain areas, from opencast to underground.
- Include some limited additional infrastructure requirements for the underground mining.

The 2016 approved EMPr includes the re-alignment of provincial Road P53-1 which links Road R555 and Road 545 on the south-eastern side of Ogies. The re-alignment of Road P53-1 has recently been optimised to improve traffic safety in respect of the curvature back into the existing road, as well as to effect minimum impact on coal reserves.

In addition to the proposed mining and infrastructural changes at GGV, GOSA is currently in negotiation with third parties in respect of the reduction and/or extension of the GGV MRA in terms of section 102 of the Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002).

24 Aug -st 2022

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## CHANGES TO MINING SCHEDULE

**I.** Additional underground areas have been included along the northern, western, and southern boundaries.

**II.** The southwestern corner will now be mined via underground methods.

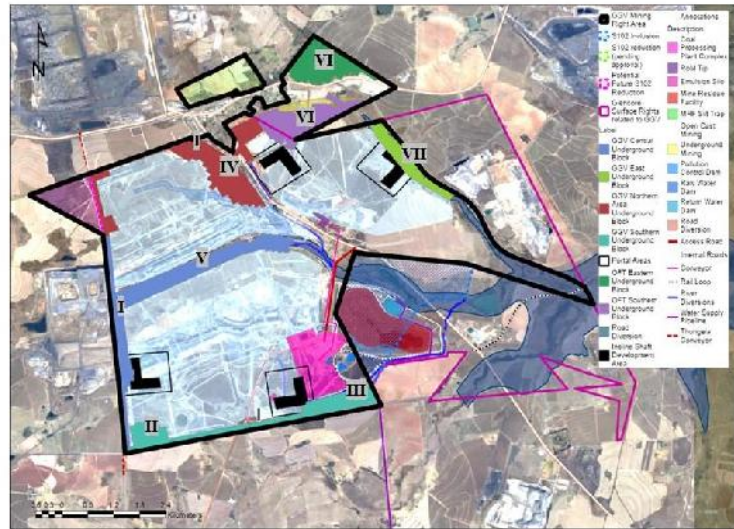
**III.** A small portion situated to the south of the CIIPP will be mined via underground methods, previously approved for opencast.

**IV.** A portion of the northern part associated with the old Ogies Underground Mine will now be mined underground instead of opencast.

**V.** The main Zaiwaterspruit river diversion running through the centre of GGv will be undermined.

**VI.** The eastern U/G block on Grootpan has increased in size, whilst the southern U/G block has decreased slightly.

**VII.** The unnamed tributary on the eastern boundary and its associated wetland system will be undermined.



24 Aug - 2022

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## U/G INFRASTRUCTURE

The U/G workings will be accessed through an incline shaft from the opencast highwall.

Run of Mine (ROM) coal from the U/G workings will be brought to surface via dedicated conveyors and stockpiled at the incline mouth. The ROM will be collected via truck and transported to the existing CHPP for processing, where the coal will be washed, classified, and stockpiled. The stockpiled coal will be transported by railway and road for domestic use and export.

Underground mining will only commence at a later stage and detail infrastructure layout plans will be developed at that time.



14 Dec - 2022

Presentation Info in Footer

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## REVISION OF ROAD RE-ALIGNMENT

The revised re-alignment of Road P53-1 has been optimised to improve traffic safety in respect of the curvature back into the existing road, as well as to effect minimum impact on coal reserves. In addition, the approved re-alignment (EMPr, 2016) extends outside of GOSA's property boundary, whilst the proposed re-alignment remains on GOSA property.

The proposed re-alignment follows the approved re-alignment for the first 860 m from the Road R545 intersection. It then deviates east for approximately 390 m, to intersect with the current alignment of Road P53-1 approximately 105 m further south than the approved re-alignment.

The total length of the proposed (revised) re-alignment is 1.25 km vs original alignment length of 1.28 km. This is a deviation of less than 5% on the total road alignment.



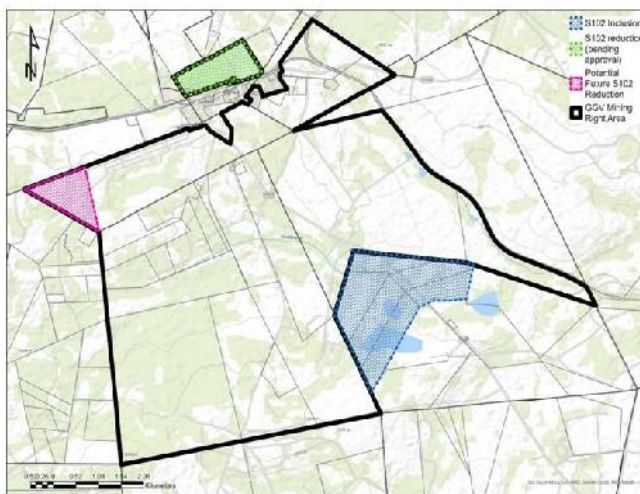
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## S102 APPLICATION FOR REDUCTION/EXTENSION OF MINING RIGHT

- An application was submitted in March 2020 to abandon the remaining extent of portion 4 of Oogiesfontein 4 IS in favour of South32 SA Coal Holdings (Pty) Ltd (now Seriti Resources). South32 simultaneously lodged an application in terms of section 102 on 25 March 2020 to incorporate the said land into its adjacent right. Both these applications remain pending.
- GOSA is in the process of negotiating a sale agreement with Mshengu Mining to buy 11790 PR from them. Once the agreement is concluded, a section 11 application to cede the PR to GOSA, together with a simultaneous application in terms of section 102 to incorporate the area into GOSA's GCV MRA will be submitted.
- A Portion of Kleinzuikerboschplaats 5 IS forms part of GOSA's GCV MR. It is contemplated that this area will be abandoned in favour of Thungela Resources and/or Seriti Resources. Negotiations are currently taking place and the necessary section 102 applications will be submitted on conclusion.



14 October 2022

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## KEY FINDINGS - BIODIVERSITY

- The proposed change in activities will not result in any additional impacts to the soils and land capability as soils within the footprint area of the incline shafts and supporting surface infrastructure will have already been lost during preparation for the preceding opencast mining.
- The proposed change in activities will not result in the clearance of additional indigenous vegetation as all habitat and floral species within the footprint area of the incline shafts and supporting surface infrastructure will have already been lost during preparation for the preceding opencast mining.

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**Develop the incline shafts into the highwall of the opencast pits, with no encroachment of the remaining natural vegetation and habitat units, and remaining wetland systems.**

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24 Aug -st2022

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## KEY FINDINGS – BIODIVERSITY (2)

- Underground mining will pose low risks to floral communities.
- Indirect impacts from mining activities on the surrounding natural habitat may arise from poor Alien & Invasive Plant (AIP) management, increased movement of personnel and sound and lighting impacts.
- Cognisance of edge effects and indirect impacts need to be taken as these may pose a risk to potential floral and faunal Species of Conservation Concern (SCC) in the adjacent sensitive habitats where no mining is planned.

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**Develop and implement a Rescue and Relocation Plan for floral SCC.**

**Develop and implement an Alien and Invasive Plant Control and Management Plan.**

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## KEY FINDINGS – SURFACE WATER RESOURCES

- The proposed underground activities will not increase the impact on the surface yield in the catchment.
- Potential subsidence of the surrounding environment could lead to inflows into the underground workings, which may drain water from surrounding wetland habitats. Reduction in the volume of water entering the remaining wetland systems could result in a loss of recharge (and thus potential desiccation) to the wetland system and downstream surface water resources, decreased ecoservice provision and further altered vegetation communities due to moisture stress.
- No additional water is required for the amendment activities.

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**The Integrated Water and Wastewater Management Plan (IWWMP) should be implemented and audited on a regular basis.**

**Ongoing surface water and wetland monitoring.**

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## KEY FINDINGS - GROUNDWATER

- Groundwater flow will essentially be toward the opencast or into active/new mining areas until groundwater levels reach the flooding elevation. No existing privately-owned boreholes are located within the indicated groundwater level impact zone.
- Until flooding occurs, the contamination plume will be restricted to the immediate vicinity of mining.
- Long-term decant volumes will be determined by the final mine design and the level of sealing of the incline shafts.

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**Regular revision of Groundwater Model.**

**Ongoing groundwater monitoring.**

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24 Aug -st 2022

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## KEY FINDINGS - BLASTING

- Blasting activities would take place during the construction of the incline portals, concurrently with existing and future opencast activities. Ground vibration levels may be unpleasant to sensitive receptors when blasting take place within approximately 1000m from structures used for residential, worship or business activities.
- Air blast levels will be clearly audible to surrounding receptors and the significance may be medium for the closest sensitive receptors.
- The potential unsafe zone from the active blasting area was calculated as 214m. Using a minimum safety factor of 2 would set a minimum unsafe zone of 428m from the active blasting area.

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**It is recommended that GGv use a minimum exclusion zone of 500 m for equipment, people and livestock.**

**Ongoing blast monitoring.**

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24 Aug -st 2022

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## KEY FINDINGS – AIR QUALITY

- The impact modelling considered the current and the proposed additional operations that will take place and the associated impacts arising from the activities on site.
- Dust fallout impacts remain within the residential and industrial limit at the site boundary.
- If anything, the proposed amendment to U/G will reduce the opencast areas, leading to a reduction in dust impacts in close proximity to the communities.

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**Impact management actions (mitigatory measures) in respect of air quality should be implemented and audited on a regular basis.**

**Ongoing dust fallout monitoring.**

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24 Aug -st 2022

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## KEY FINDINGS – NOISE

- The area has a complex noise sound character, with elevated sound levels in and around Ogies, as well as close to the various public haulage roads in the area.
- The proposed amendment will not significantly change the future noise levels in the area and the area would keep the existing noise character.
- If anything, the proposed amendment will reduce the opencast areas with a subsequent reduction in the extent of future noise levels.

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**Impact management actions (mitigatory measures) in respect of noise should be implemented and audited on a regular basis.**

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24 Aug -st 2022

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## KEY FINDINGS – VISUAL/AESTHETICS

- The existing mining activities have altered the character of the landscape from a rural setting to a mining setting. As such, the visual impact associated with mining activities are already present in the area, and the proposed incline shaft areas and U/G mining operations will not have an additional negative effect on the landscape character of the area with a negligible additional visual impact on the receiving environment.
- The existing mining activities act as an extensive source of night-time lighting. The lighting environment of the region is therefore considered suburban with medium district brightness. As a result of the existing night-time light sources, lighting levels are not expected to significantly increase in this area due to the proposed infrastructure.

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**A Rehabilitation, Decommissioning and Closure Plan must be developed for the GGV Complex.**

**Ongoing rehabilitation and vegetation monitoring.**

---

24 Aug -st 2022

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## KEY FINDINGS – CULTURAL HERITAGE

- Several sites of cultural heritage importance (gravesites, historical structures) remain situated within the MRA, and care should be taken to avoid any impact on these sites.

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**Cultural Heritage Management Plan should be implemented and audited on a regular basis.**

**Ongoing monitoring by a qualified heritage specialist for early detection of unidentified sites.**

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24 Aug -st 2022

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## KEY FINDINGS – SOCIO-ECONOMIC

- The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.
- Mining activities and associated employment benefits and Social & Labour Plan (SLP) contributions will continue regardless of whether this amendment is approved or not.
- If the decision is taken not to authorise the proposed amendments, some of the benefits may reduce slightly, i.e. tax contribution, capital formation. The LOM may also reduce slightly, thereby reducing the supply to Eskom for power generation.

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**Ongoing environmental monitoring, auditing and reporting.**

**Implementation and auditing of the SLP.**

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24 Aug -st 2022

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## KEY FINDINGS – REVISION OF ROAD RE-ALIGNMENT

- The approval for the road re-alignment is in place and this application for an amendment is only a slight revision of the route that was approved in 2015, with a deviation of less than 5% on the total road alignment.
- The revised re-alignment has been optimised to improve traffic safety, as well as to effect minimum impact on coal reserves.
- The revised re-alignment will remain on GOSA property with no impact on privately-owned land.
- No additional impact is thus anticipated.

24 Aug -st 2022

**Road upgrades and improvements to be designed by a professional engineer and submitted for official approval by the Mpumalanga Provincial Roads Department.**



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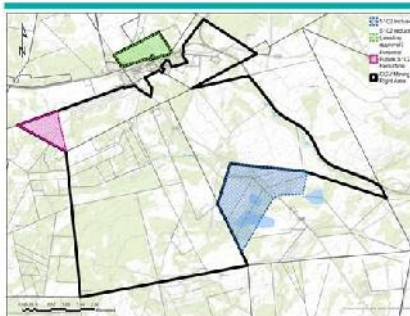
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## KEY FINDINGS – REDUCTION/EXTENSION OF MRA

- The reduction of the GGV MRA being negotiated with third parties will not change the impacts associated with the GGV operations.
- Similarly, the extension of the MRA to include the Mine Residue Facility (MRF) will not result in any additional impacts, as these have been addressed and approved in the 2016 EMP.
- If anything, it will positively mitigate mine health and safety aspects associated with the MRF which must be managed in terms of the Mine Health and Safety Act (MHSA), 1996 (Act 29 of 1996).

24 Aug -st 2022

**Share information with new Mining Right holders in respect of potential impacts to cultural heritage sites and communities.**



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## KEY FINDINGS – CONCLUSION

- The key findings from the specialist studies and risk assessment indicate that there will be limited new impacts due to the amendment application.
- If anything, the proposed amendment will reduce the opencast areas, leading to a reduction in impacts (noise, dust, etc.) in close proximity to the communities.
- Existing impacts on the environmental and local communities will continue regardless of this amendment. Having said this, appropriate mitigation measures have been identified to avoid and/or minimise the impacts associated with the existing approved activities.
- The sensitive environmental and social features should be avoided and conserved as far as possible.
- Environmental monitoring, auditing and reporting as presented in the EMPr must be adhered to and reviewed on a regular basis.



24 Aug - 2022

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## WAY FORWARD

For any queries and comments, please contact our PP Office.

You can provide your comments by emailing or faxing it to:

**Lizinda Dickson / Fransis Stoltz**

**Tel: 012 543 9093; Fax: 086 571 0939**

**Email: [ggvamendment@participation.co.za](mailto:ggvamendment@participation.co.za)**

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**CLOSING DATE FOR COMMENTS:  
12 SEPTEMBER 2022**

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24 Aug - 2022

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**THANK YOU FOR YOUR TIME AND  
ATTENDANCE**

24 August 2022

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# Appendix 1-6 Comments and Response Report

# PROPOSED AMENDMENT TO ENVIRONMENTAL AUTHORISATION AND MANAGEMENT PROGRAMME

**Applicant:** Glencore Operations (Pty) Ltd: GGV Complex

**Applications:** Amendment to Environmental Authorisation and Management Programme

**Phase:** Announcement Phase

**Location:** GGV is located approximately 50 km south-west of eMalahleni, and 38 km east of Delmas. The town of Ogies is situated directly north of GGV. The GGV Mining Right straddles various portions of the farms Goedgevonden 10 IS, Zaaewater 11 IS, Kleinzuikerboschplaats 5 IS and Grootpan 7 IS.

**Environmental Assessment Practitioner:** Marietjie Eksteen, Jacana Environmentals cc

**Public Participation Office:** 012 543 9093 (t) or email at [ggvamendment@participation.co.za](mailto:ggvamendment@participation.co.za)



## COMMENTS AND RESPONSE REPORT


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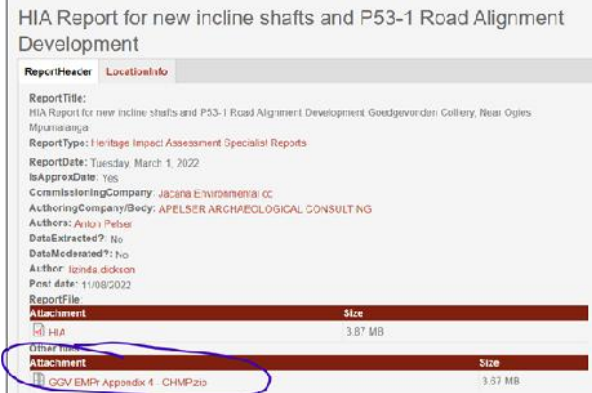
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# 1 AUTHORITIES

COMMENT	STAKEHOLDER	RESPONSE
<p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that a field-based Palaeontological Impact Assessment (PIA) be conducted as part of the EA process as the development footprint is located in an area of very high sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map. The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p>	<p>Natasha Higgitt Heritage Officer South African Heritage Resources Agency 9 Sept 2022</p>	<p>It is agreed that the development footprint is located in an area of very high sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity map. However, the GGV Complex is an existing operational mine, operating under Mining Right No. MP 30/5/1/1/2/169 MR and has an approved EMPr.</p> <p>This is therefore not an application for a new mine of an expansion, only for an amendment to the existing EA and EMPr to facilitate limited changes to the approved mining schedule. The mine will continue regardless of the amendment.</p> <p>The underground workings will be accessed through an incline shaft from the opencast highwall and the required infrastructure to support the underground workings will be constructed within the already approved opencast footprint. This will prevent any further surface disturbance and vegetation clearance within the remaining natural environment.</p> <p>We believe that a field-based Palaeontological Impact Assessment (PIA) will add no value at this stage, as the mine is already approved and operating, the underground mining is at the shallowest more than 30m deep (so no fossils will be visible on surface), and the road re-alignment is on mined-out areas.</p> <p>Dr Heidi Fourie was appointed to conduct a desktop study explaining and outlining the application.</p>
<p>Additionally, the HIA must be revised to address the following:</p> <ul style="list-style-type: none"> <li>▪ The results of the blasting report must be included in the impact assessment of the heritage resources;</li> <li>▪ The impact of the new proposed underground mining areas and potential subsidence on heritage resources (including palaeontological resources) must be assessed;</li> </ul>	<p>Natasha Higgitt Heritage Officer South African Heritage Resources Agency 9 Sept 2022</p>	<p>No direct impact (blasting/subsidence) is envisaged on the sites of cultural heritage significance. The potential indirect impacts are addressed in the EIA and CHMP, with the necessary management actions required to prevent any impacts.</p> <p>Site MHC031 is one of the disputed grave sites as listed in the CHMP. The necessary management actions have been identified to resolve the discrepancies identified and will be addressed in due course.</p>

COMMENT	STAKEHOLDER	RESPONSE
<ul style="list-style-type: none"> <li>▪ The location and status of site MHC031 must be verified;</li> <li>▪ A full description of the site GY16 must be provided.</li> </ul>		<p>A full description of GY16 has been provided in previous HIA reports, as well as in the CHMP. It is an informal graveyard located between maize fields, remains of approximately ten individuals. Some of the graves are fitted with cement head stones and edged with cement strips or upright stones. Ref: Pistorius, 2004 &amp; 2009; Cultmatrix, 2007.</p> <p>The existence of the site was again verified by APAC in 2022 – refer to pictures below. The necessary management actions to conserve the site is provided in the CHMP.</p> <div style="text-align: center;">  </div> <p style="text-align: center;">GY-16 with ten graves is located between maize fields (Pistorius, 2009).</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Two of the graves on the site (APAC, 2022).</p>

COMMENT	STAKEHOLDER	RESPONSE
		 <p data-bbox="1125 667 1881 727">Another of the identified graves on GY16. There are approximately 10 graves at the site (APAC, 2022).</p>
<p data-bbox="205 732 772 1019">Finally, the CHMP must be submitted for review. The applicant is advised to extend the EA process in terms of section 32(1)b of the NEMA EIA Regulations in order to address this comment. Further comments will be issued upon receipt of the above requested reports. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	<p data-bbox="800 732 1045 889">Natasha Higgitt Heritage Officer South African Heritage Resources Agency 9 Sept 2022</p>	<p data-bbox="1098 732 1902 792">The CHMP (Appendix 4 of the EMPr) was submitted on the SAHRIS system together with the HIA.</p> <p data-bbox="1098 829 1902 1052"><i>Email correspondence: We have received your comments on the SAHRIS system and will provide a full response in due course. We just wanted to check with you whether you noticed the Cultural Heritage Management Plan uploaded as an additional file under the Heritage Impact Assessment. Please see the screenshot below. I see you mention in the comment that the report should be submitted for review, but we did submit it with the EIA and HIA.</i></p>

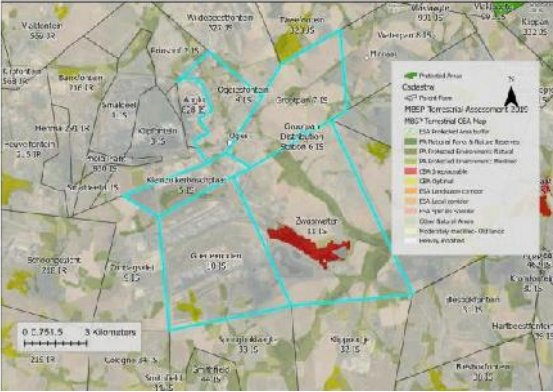
COMMENT	STAKEHOLDER	RESPONSE
		 <p>Natasha Higgitt: Thank you for the email. My apologies for missing that. I will provide comments on the CHMP once the requested assessments have been submitted.</p>
<p>The Applicant shall conduct a preliminary legal assessment to identify all the water use activities associated with the proposed project that will require authorisation by the DWS. Furthermore, the applicant shall take note of section 22( 1) of the National Water Act, 1998 (Act No. 36 of 1998):</p> <p><i>"Permissible water use", a person may only use water-</i></p> <ul style="list-style-type: none"> <li>a) <i>without a licence –</i> <ul style="list-style-type: none"> <li>a. <i>if the water use is permissible under Schedule 1;</i></li> <li>b. <i>if that water is permissible as a continuation of an existing lawful use (section 32); or</i></li> <li>c. <i>if that water use is permissible in terms of general authorisation issued under section 39;</i></li> </ul> </li> <li>b) <i>if the water use is authorised by a licence under this Act; or</i></li> </ul>	<p>Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022</p>	<p>Noted.</p>

COMMENT	STAKEHOLDER	RESPONSE
c) <i>if the responsible authority has dispensed with a licence requirement under subsection (3), (of the same Act).</i>		
Any other water use related activities associated with this project that are not permissible as indicated under section 22(1) of the National Water Act, 1998 (Act No. 36 of 1998) shall have to be authorised by the DWS prior to such water use activities taking place and the applicant is requested to liaise with the DWS for guidance on the requirements for such an authorisation.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Golder Associates is in the process of revising and consolidating the WUL's for GGV. Any additional water use activities associated with this amendment will be identified and authorised as part of this process.
<b>Flood-lines:</b> The applicant shall note that no activities should occur within a 100m or within the 1: 100 year flood line or whichever is the greatest, unless authorised.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted.
<b>Stormwater Management:</b> The applicant shall ensure that clean stormwater is diverted away from all the working areas and stormwater leaving the construction areas must not be contaminated by any substance, whether that substance is a solid, liquid, vapour or any combination thereof. Should there be impacts on stormwater, adequate mitigation measures must be implemented as soon as possible. Furthermore, the applicant should note that stormwater control and management must be undertaken in accordance to the prescribes of Government Notice 704 of 04 June 1999 (GN 704) Regulation.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted. This is addressed in the 2021 IWWMP attached as Appendix 3 to the EMPr.
<b>Wetlands and streams:</b> If the activity or placement of the new structures will cross the river or will be within 500 metres of the regulated area (wetland), it constitutes a Section 21 (c) and (i) water use which requires authorisation in terms of the	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted. A Freshwater Assessment was conducted as part of the EMPr amendment process (refer to Annexure 3 of the BAR).

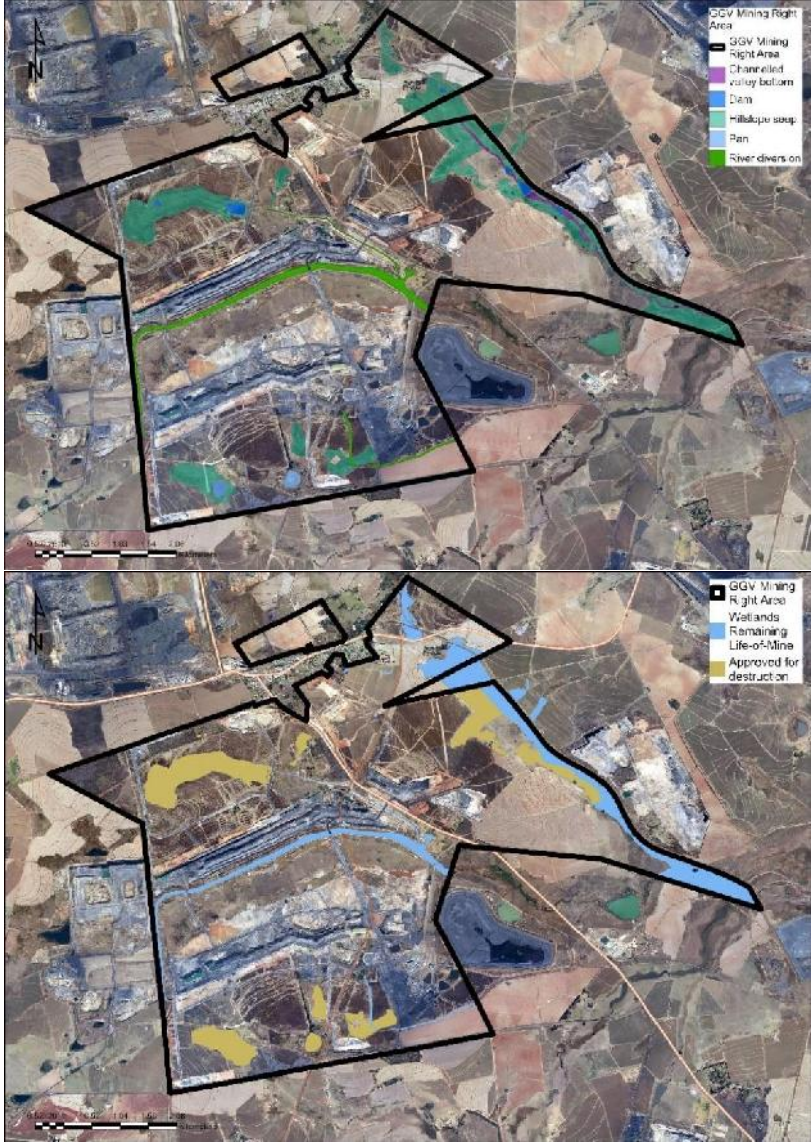


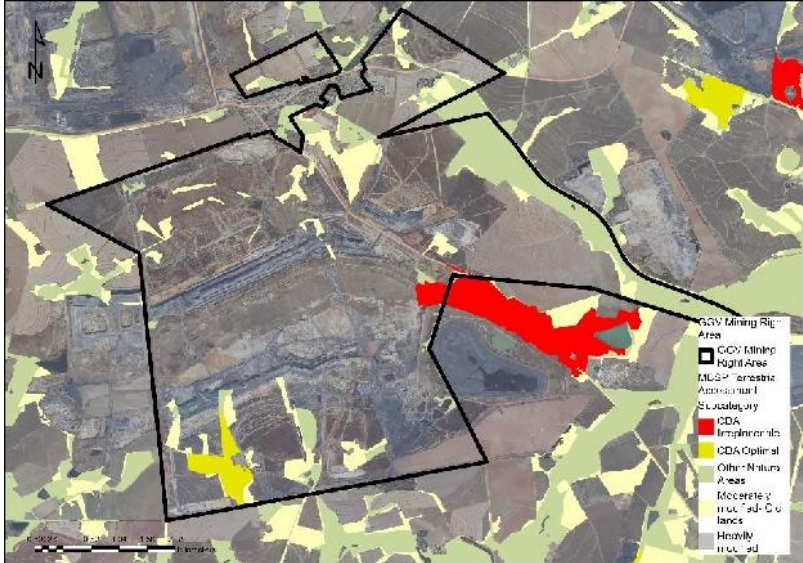
COMMENT	STAKEHOLDER	RESPONSE
National Water Act, 1998 (Act 36 of 1998). A wetland study should also be conducted.		
<b>Storage of oil, diesel, hydraulic fluids and grease:</b> It is recommended that the storage areas for these fluids be bunded with cement and in such a manner that any spillages can be contained and reclaimed without causing any pollution to the ground and surface water resources.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Hydrocarbon storage facilities at GGV are bunded with a capacity of 110% to prevent any spillages.
<b>Public Participation:</b> The applicant shall note that this is one of the critical requirements when processing a water use authorisation application and it must be done as per "Regulations Regarding Procedural Requirements for Water Use Licence Applications and Appeals."	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted.
<b>Potable water:</b> The applicant shall note that taking water from a water resource either through a borehole or any other means, is a water use in terms of Section 21(a) of the National Water Act, 1998 (Act 36 of 1998) and must be authorised by the DWS.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	A water treatment plant has been provided at GGV to treat mine affected water and supply the potable water requirements of the operation. Potable water is supplied through the treatment of mine water at the Western Pollution Control Dam in a small reverse osmosis (RO) plant. This plant has a treatment capacity of 50 m <sup>3</sup> /day. No surface or groundwater aquifers are abstracted for this purpose.
<b>Storing water:</b> The storing of clean water into a dam will constitute a water use in terms of section 21(b) of National Water Act, 1998 (Act 36 of 1998) which refers to "storing water" and must be authorised by the DWS.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted. All clean water storage facilities have been identified and are authorised under the current WUL's for GGV. Any additional dams not yet authorized will be included in the revised IWULA currently underway.
<b>Discard Dump, Run-of-Mine (RoM) and Overburden Stockpiles:</b> The applicant shall note that the establishment and usage of a discard dump, RoM and overburden stockpiles are regarded as water use activities in terms of Section 21 (g) of the National Water Act, 1998 and authorisation thereof is required prior to commencement.	Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022	Noted. All dumps & stockpiles have been identified and are authorised under the current WUL's for GGV. Any additional dumps / stockpiles not yet authorized will be included in the revised IWULA currently underway.
<b>Construction of Pollution Control Dam and Slurry Dam:</b> The lined Pollution Control Dam and Slurry Dams to be constructed shall be authorised prior to	Zintle Mbeka Provincial Head: Mpumalanga	Noted. All PCDs and the MRF are authorised under the current WUL's for GGV. Any additional dams associated with the underground infrastructure will be included in the revised IWULA currently underway.

COMMENT	STAKEHOLDER	RESPONSE
<p>construction. In an event that the capacity of the dams be more than 50 000 m3 and 5 metres in height, the Dam Safety Regulations must be followed. Furthermore, the dams must be designed by a qualified professional engineer. It shall also be noted that such an activity is regarded as a water use activity in terms of Section 21 (g) of the National Water Act, 1998 and authorisation thereof is required prior to commencement.</p>	<p>Department of Water and Sanitation 12 Sept 2022</p>	
<p><b>Dust suppression:</b> The applicant shall note that the usage of dirty water for dust suppression is regarded as a water use activity in terms of Section 21 (g) of the National Water Act. 1998 and authorisation thereof is required prior to commencement of said activity.</p>	<p>Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022</p>	<p>Noted. Dust suppression is authorized under the current WUL's for GGV.</p>
<p><b>Dewatering of adit and underground workings:</b> The applicant shall note that the removal of water found underground for continuation and/or safety of people is regarded as a water use activity in terms of Section 21 (j) of the National Water Act, 1998 and authorisation is required prior to commencement of activity.</p>	<p>Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022</p>	<p>Noted. Dewatering of the opencast &amp; underground workings is authorized under the current WUL's for GGV. Any additional dewatering required for the amendment activities will be included in the revised IWULA currently underway.</p>
<p><b>Sanitation:</b> There is no indication of type of ablution facility that will be used. The applicant shall note that the use of septic tanks is regarded as a water use in terms of Section 21 (g) of the National Water Act, 1998 and authorisation is required prior to commencement of the activity. The applicant shall also ensure that no sanitary system is located within a horizontal distance of 100 metres from any watercourses. Thus, reasonable measures shall have to be taken to prevent the potential pollution of the ground and surface water resources due to the proposed onsite sanitation facilities. The applicant shall note that the French</p>	<p>Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022</p>	<p>Noted. Sewage management at GGV takes place at the existing sewage treatment plant. The sewage plant consists of a bio-filter rotary-disc unit. The final effluent is sterilised by chlorination to produce a final water quality which will comply with all the regulatory and statutory requirements. This water is recycled for reuse in the processing plant.</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>drains are not allowed since they pollute and an environmental friendly mode should be used.</p>		
<p><b>Pollution:</b> The applicant is referred to Section 19(1) of the National Water Act, 1998 (Act No. 36 of 1998) and to report any pollution incidents originating from the proposed project to the relevant Regional Office of the Department of Water and Sanitation within twenty-four (24) hours.</p>	<p>Zintle Mbeka Provincial Head: Mpumalanga Department of Water and Sanitation 12 Sept 2022</p>	<p>Noted. This forms part of the Emergency Preparedness and Response Plan provided for in the EMPr and IWWMP.</p>
<p>Your Draft BAR, Jacana received in August 2022, refers.</p> <p>The application was assessed using the Mpumalanga Biodiversity Sector Plan (MBSP). The sensitivity was assessed in terms of MBSP Terrestrial Biodiversity and Freshwater sensitivity assessments, and concerns were indicated on both assessment maps:</p> <p>a) The MBSP Terrestrial assessment map, Figure 1, indicates that the proposed amendment area overlaps with MBSP <i>Critical Biodiversity Areas irreplaceable</i> (CBA irreplaceable) areas.</p>  <p>b) The MBSP Freshwater assessment map, Figure 2, indicates that the proposed amendment area overlaps with <i>Ecological Support Area Wetlands</i> (ESA).</p>	<p>Phumla Nkosi MTPA 15 Sept 2022</p>	<p>Noted. See responses below.</p>



COMMENT	STAKEHOLDER	RESPONSE
<p>and dewatering, the company should invest in an offset strategy. And subsidence the mitigation measures should be indicated.</p> <ul style="list-style-type: none"> <li>The critically endangered terrestrial orchid, <i>Brachycorythis conica subsp. transvaalensis</i>, might occur within this mining right area. (Flowers from January to February).</li> </ul>		 <p>The top map shows the mining right area (black outline) with various features highlighted: Channelled valley bottom (purple), Dam (blue), Hilllope seep (light blue), Pan (light blue), and River diversions (green). The bottom map shows the mining right area (black outline) with Wetlands (blue) and Areas Approved for destruction (yellow) highlighted. Both maps include a north arrow and a scale bar.</p>

COMMENT	STAKEHOLDER	RESPONSE
		<p>The Terrestrial CBA is indicated in the map below. It is clear that the majority of the CBA is outside of the MR area and will not be directly impacted. The small portion that is situated within the MR area according to the MBSP has been mined through under previous authorisations.</p>  <p>The map displays a landscape with various environmental zones. A black outline indicates the Mining Right Area. A red area represents the Terrestrial CBA. Other zones include CDA Implementation (yellow), CDA Optimal (light green), Other Natural Areas (dark green), Accelerating Rehabilitation (light blue), and Heavily Rehabilitated (dark blue). A legend in the bottom right corner identifies these zones. A north arrow and a scale bar are also present.</p> <p>Glencore is actively involved with a wetland offset strategy implementation in the Lakenvlei area close to Dullstroom. MTPA is part of the EMC for the project.</p>
<p><b>Recommendations:</b></p> <ol style="list-style-type: none"> <li>1. The MTPA recommends that a thorough flora study is done during the growing season over these farms.</li> <li>2. Wetland delineation is done in order to establish the required buffer zone of 100 metres, as well as a determination of the size in hectares of these sensitive areas.</li> </ol>	<p>Phumla Nkosi MTPA 15 Sept 2022</p>	<p>The following commitments are made within the EMPr:</p> <ul style="list-style-type: none"> <li>• Develop and implement a Rescue and Relocation Plan for floral Species of Conservation Concern (SCC) prior to construction and further mining and operational activities commencing.</li> <li>• The necessary permits should be obtained from the MTPA prior to the relocation of the SCC.</li> <li>• The revegetated and surrounding areas will be monitored for declared weeds and invasive plants. This will be controlled and</li> </ul>

COMMENT	STAKEHOLDER	RESPONSE
<p>3. If the mentioned orchid species is found, the MTPA Scientific Services should be notified.</p> <p>4. That the flora study must include all exotic plants that need to be removed and a long term maintenance plan is included in the EMP.</p> <p>5. Planning for active water purification should form part of the EMP, as well for the next 100 years after mining.</p>		<p>managed as per the Alien and Invasive Plant Control and Management Plan (AIPCP) – refer to Appendix 2 of the EMPr.</p> <p>Glencore has since 2006 developed a Strategic Water Management Plan (SWMP). This plan outlines the water management strategy of the complexes and how to deal with water over the LOM and post-closure. Due to the nature of mining, the mine plan is always evolving, and changes therefore need to be made to the water strategy on a regular basis. Surface water and groundwater studies have since the development of the SWMP predicted that excess water will become an issue in years to come. In 2011 Glencore initiated a Water Treatment Strategy (Golder, 2011) to deal with excess mine water for the next 30 years. This plan will be updated regularly as more data becomes available.</p>
<p>The Department has received the Draft BAR for the abovementioned project on 11 Aug 2022. Based on the information supplied, the Department has no objections to the proposed amendment and development. You may proceed with the submission of the final BAR with the consideration of the comments below:</p>	<p>Dineo Tswai MDARDLEA 12 Sept 2022</p>	<p>Noted.</p>
<p>Vegetation clearance must be limited to the proposed development footprint on the new areas identified for the extension of the mine.</p>	<p>Dineo Tswai MDARDLEA 12 Sept 2022</p>	<p>The underground workings will be accessed through an incline shaft from the opencast highwall and the required infrastructure to support the underground workings will be constructed within the already approved opencast footprint. This will prevent any further surface disturbance and vegetation clearance within the remaining natural environment.</p>
<p>MTPA comments must be sourced and recommendations thereof must inform the proposed development areas and the protection of any identified endangered species if any on the areas not previously affected by mining activities.</p>	<p>Dineo Tswai MDARDLEA 12 Sept 2022</p>	<p>Comments from MTPA were received on 15 Sept 2022 and responses thereto are addressed above.</p>
<p>Applicable licences must be obtained before the commencement of the activity.</p>	<p>Dineo Tswai MDARDLEA 12 Sept 2022</p>	<p>Noted.</p>

COMMENT	STAKEHOLDER	RESPONSE
Applicable municipal By-Laws must be considered and adhered to at all times throughout the lifespan of the project.	Dineo Tswai MDARDLEA 12 Sept 2022	Noted.
All recommendations, key findings and conditions made in the specialist studies must be adhered to.	Dineo Tswai MDARDLEA 12 Sept 2022	Recommendations by the specialists were considered during the EIA process and included as mitigation measures/commitments in the EMPr.
Complaints received from the public must be attended to as soon as possible and addressed to the satisfaction of all concerned.	Dineo Tswai MDARDLEA 12 Sept 2022	GGV has an established Complaints and Grievance Procedure. All complaints are followed up within 30 days and only closed out once resolved to the satisfaction of the complainant.
The applicant is responsible for the compliance with the provisions for “Duty of Care” and remediation of damage contained in Section 28 of the National Environmental Management Act, (Act 107 of 1998).	Dineo Tswai MDARDLEA 12 Sept 2022	Noted.

## 2 AFFECTED PARTIES

### 2.1 NEIGHBORING LANDOWNERS


COMMENT	STAKEHOLDER	RESPONSE
Please note that we are the landowners on the eastern and western side of the road (P53-1).	Boetie Gani Ogies Township Company 8 June 2022	Noted.
Ogies Muslim Jamaat We request that the Imaam and/or Jamaat members should be consulted regarding blasting schedules occurring within 1000 (one thousand) meters of the Mosque and graveyard.	Caz Dry Attorneys obo MMS Masakhane Mining Supply & Construction cc Ogies Muslim Jamaat Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022	The mine will discuss the blasting schedule when blasting is to take place within 1,000 m from the Mosque with the Muslim Imaan of the Mosque to agree on the most appropriate time to blast. This is a commitment in the EMPr. Communication with the affected parties will continue as per the current procedure.



COMMENT	STAKEHOLDER	RESPONSE
<p>Ogies Muslim Jamaat</p> <p>That a comprehensive photographic record be compiled by the applicant regarding the structural status and integrity of all structures inclusive of the graveyard, boundary walls, Mosque and Madressah, in order to compile a comprehensive, detailed report for future references of any possible damage caused through the applicants mining operations.</p>	<p>Caz Dry Attorneys obo MMS Masakhane Mining Supply &amp; Construction cc Ogies Muslim Jamaat Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022</p>	<p>The following management actions have been identified in the Cultural Heritage Management Plan (CHMP) – Appendix 4 of the EMPr, which will be implemented on approval of the EMPr amendment:</p> <p><b><u>Graveyard</u></b></p> <ul style="list-style-type: none"> <li>• Demarcate the graveyards with a fence or wall and fit with an access gate.</li> <li>• A buffer of at least 100m should be maintained between the sites and mining activities. This buffer zone must be maintained and zoned as no-go areas.</li> <li>• Pre-blast structural survey of the gravesites to be conducted before blasting commences within a radius of 500m of the sites.</li> <li>• The graveyards should be inspected every three months and noted in an inspection register. The register should outline the state of the graveyards during each inspection. Reports on damages to any of the graves or to the graveyards (fences, walls, gates) should be followed with the necessary maintenance work. Maintenance work should be recorded in the inspection register.</li> <li>• The graveyards should be kept tidy from any invader weeds and any other refuse.</li> </ul> <p><b><u>Mosque and Madrassa</u></b></p> <ul style="list-style-type: none"> <li>• Pre-blast structural surveys to be conducted of the Mosque and Madrassah before blasting commences within a radius of 1 km.</li> <li>• A buffer of 500m must be kept between the Mosque and Madrassah and any infrastructural development and opencast mining activities. This buffer should be maintained and zoned as a no-go area.</li> <li>• When blasting is conducted close (within 1 km) to the Mosque and Madrassah, blasting activities must be curtailed at times of worship or as agreed to with the leaders.</li> <li>• Vibration and air blast monitoring must be conducted if blasting within 1 km of the Mosque and Madrassah.</li> <li>• Regular inspections should be conducted to identify any signs of subsidence, followed by the necessary action and maintenance.</li> </ul>
<p>MMS Masakhane Mining Supply &amp; Construction cc &amp; Ogies Township Company (Pty) Ltd</p>	<p>Caz Dry Attorneys obo</p>	<p>Noted.</p>

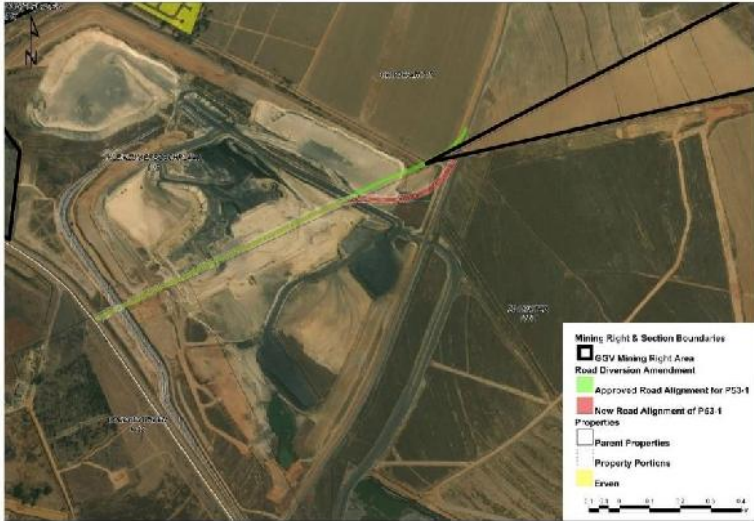
COMMENT	STAKEHOLDER	RESPONSE
<p>Our client is the registered owner of the following properties which is affected by the proposed amendments:</p> <p>Remaining Extent of Portion 1 of the Farm Grootpan 7 IS  Portion 28 of the Farm Grootpan 7 IS  Portion 51 of the Farm Grootpan 7 IS</p>	<p>MMS Masakhane Mining Supply &amp; Construction cc  Ogies Muslim Jamaat  Ogies Township Company  Boetie Gani  Ogies Township Company  9 Sept 2022</p>	
<p>MMS Masakhane Mining Supply &amp; Construction cc &amp; Ogies Township Company (Pty) Ltd  All blasting scheduled within 1000 (one thousand) meters of the aforementioned properties, should be conducted between the hours of 10h00 and 16h00.</p>	<p>Caz Dry Attorneys obo  MMS Masakhane Mining Supply &amp; Construction cc  Ogies Muslim Jamaat  Ogies Township Company  Boetie Gani  Ogies Township Company  9 Sept 2022</p>	<p>The potential unsafe zone from the active blasting area was calculated as 214 m. Using a minimum safety factor of 2 would set a minimum unsafe zone of 428 m from the active blasting area, although it is critical to note that the occurrence of fly rock can never be excluded. GGV will use a minimum exclusion zone of 500 m (equipment, people or livestock). All sensitive receptors (humans/animals) within 500m of the blast will be notified and evacuated.</p> <p>The infrastructure and properties owned by your clients are classified as sensitive receptors, so the same procedure as provided above will apply.</p> <p>Blasting is conducted to a regular programme that is restricted to the period between 08h00 and 16h00.</p>
<p>MMS Masakhane Mining Supply &amp; Construction cc &amp; Ogies Township Company (Pty) Ltd  That a comprehensive photographic record be compiled by the applicant regarding the structural status and integrity of all farmhouses, outbuildings, dams, swimming pools and related infrastructure, in order to compile a comprehensive, detailed report for future references of any possible damage caused through the applicants mining operations.</p>	<p>Caz Dry Attorneys obo  MMS Masakhane Mining Supply &amp; Construction cc  Ogies Muslim Jamaat  Ogies Township Company  Boetie Gani  Ogies Township Company  9 Sept 2022</p>	<p>As indicated in the BAR, underground mining will only commence at a later stage. GGV commits to conduct pre-blast structural surveys of the farmhouses, outbuildings and related infrastructure prior to the commencement of underground mining as already stated.</p>
<p>MMS Masakhane Mining Supply &amp; Construction cc &amp; Ogies Township Company (Pty) Ltd</p>	<p>Caz Dry Attorneys obo  MMS Masakhane Mining Supply &amp; Construction cc  Ogies Muslim Jamaat</p>	<p>Noted.</p>

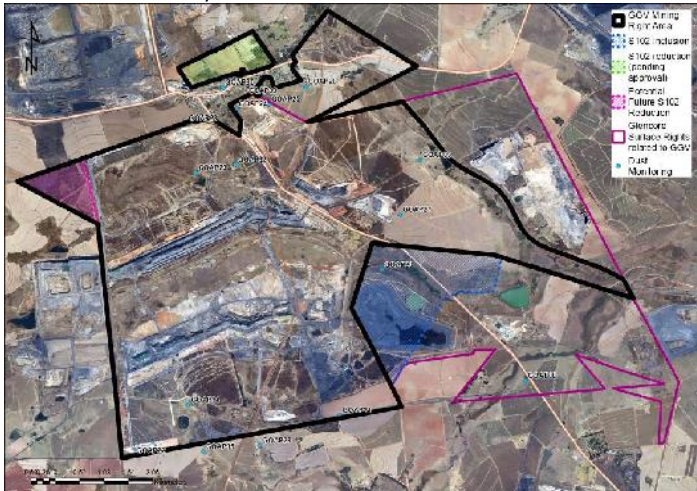
COMMENT	STAKEHOLDER	RESPONSE
Our client's properties and agricultural activities are supplied with water through boreholes situated within the mining area.	Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022	
MMS Masakhane Mining Supply & Construction cc & Ogies Township Company (Pty) Ltd All boreholes should, on a quarterly basis, be monitored and evaluated for any possible reduction of yield and/or contamination by the applicant and provided to our client. These boreholes supply drinking water to not only the human occupants of the farmhouses, but also to the livestock and other agricultural activities.	Caz Dry Attorneys obo MMS Masakhane Mining Supply & Construction cc Ogies Muslim Jamaat Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022	GGV has an existing water monitoring programme in place which is reviewed regularly. Groundwater levels are monitored quarterly and qualities biannually. The monitoring programme will be extended to include the private boreholes situated within the MR area on farm Grootpan 7 IS, to be monitored biannually.
MMS Masakhane Mining Supply & Construction cc & Ogies Township Company (Pty) Ltd In the event that the supply boreholes, in any way whatsoever is affected by either reduction and/or contamination through the mining activities of the applicant, same should be replaced by the applicant at their cost and/or suitable alternative fresh water supply should be provided by the applicant.	Caz Dry Attorneys obo MMS Masakhane Mining Supply & Construction cc Ogies Muslim Jamaat Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022	The following commitment is made in the EMP: In the case of depletion or contamination of water resources due to mining activities, alternative supplies of water to replace existing usage will be negotiated with affected groundwater users based on a structured compensation protocol.
MMS Masakhane Mining Supply & Construction cc & Ogies Township Company (Pty) Ltd We attach hereto five water boreholes certificates with co-ordinates which is located within the mining area of the applicants.	Caz Dry Attorneys obo MMS Masakhane Mining Supply & Construction cc Ogies Muslim Jamaat Ogies Township Company Boetie Gani Ogies Township Company 9 Sept 2022	Four of the five boreholes for which coordinates have been supplied lies within the MR area, only one within the active mining area. It is unlikely that the borehole in town will be impacted (the northernmost borehole). However, the other three holes are relatively close to the mining area.  The four boreholes within the MR area will be included in the monitoring programme as indicated above. Apart from ongoing monitoring, it is also recommended that the groundwater demands and usages (metered) for the two entities be mutually agreed upon for future reference and cooperation.

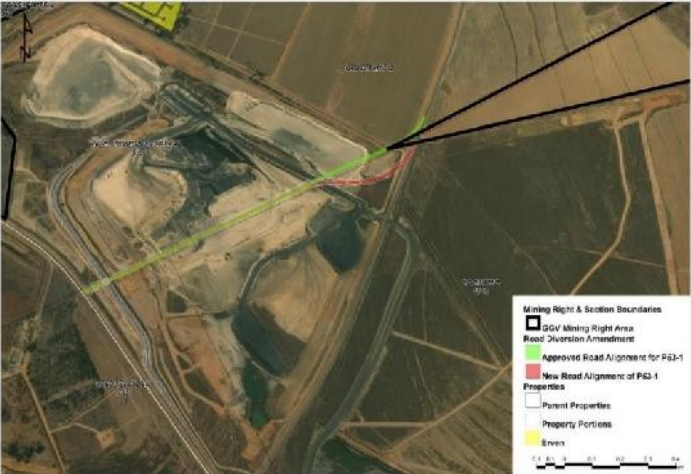
COMMENT	STAKEHOLDER	RESPONSE
		

## 2.2 OGIES TOWN STAKEHOLDERS

COMMENT	STAKEHOLDER	RESPONSE
<p>I am the owner of Nenqe Advance in Ogies town As far as I know the closing date for comment on the propose GGV underground mining in Ogies are today. Up to today no community meeting was held with the Ogies town community. Only links for comment was sent out.</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>The EIA Regulations 2014 stipulate minimum requirements for public participation, which were fully complied with. The EIA Regulations do not require that public meetings be held with interested and affected parties.</p> <p>In addition, the draft BAR and EMPr were also made available for review at public places within Ogies and Phola for review by stakeholders and IAPs.</p>
<p>In the proposed document it is said that the road linking the old Ogies Witbank road with the Ogies Bethal road will be redirect, as far as I know the Ogies distress community group won a case in the</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>The 2016 approved EMPr includes the re-alignment of provincial Road P53-1 which links Road R555 and Road 545 on the south-eastern side of Ogies. Environmental Authorisation for the re-alignment of Road P53-1 was granted by the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA) on 8</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>North Gauteng high court where by GGV are not allowed to touch, close or redirect the said road.</p>		<p>September 2015 (Ref No 17/2/3N-273). The re-alignment of Road P53-1 has recently been optimised to improve traffic safety in respect of the curvature back into the existing road, as well as to effect minimum impact on coal reserves. This involves just a slight change to the approved alignment which is regarded as safer. The approved and new road alignments are indicated below (Figure 9 in the EMPr).</p>  <p>You are correct that an interim interdict was granted to the Distressed Mining Community of Ogies preventing the closure of the Provincial Road P53-1 between the R555 and the R545. The proposed alignment of the P53-1 forming the subject of the amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1</p>
<p>When can a physical meeting be held with the Ogies Town community self?</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>The EIA Regulations 2014 stipulate minimum requirements for public participation, which was fully complied with. The EIA Regulations do not require that public meetings be held with IAPs.</p>


COMMENT	STAKEHOLDER	RESPONSE
		<p>However, a Focus Group meeting was held with representatives of the registered forums of the Ogies, Phola and surrounding farming communities on 24 August 2022. The Ogies Business Forum, as well as Ward Councillors attended the meeting, amongst others.</p>
<p>Some of our concerns are that the said underground activities will be behind the Ogies combined school, and part of the houses, and preschool in the same line.</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>It is noted that the underground mining has been approved on 20 April 2010 (Ref: MP 30/5/1/2/2/343 MR) and therefore does not constitute new mining activities. This amendment only addresses very slight changes to the approved underground mining schedule that was previously approved. No additional impacts are envisaged due to the change in mining schedule.</p>
<p>How will the dust be monitored?  Will dust monitoring be done on ground level and not only by plane +- 2km above ground?</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>GGV Complex has an established dust fall-out monitoring network. Settleable particles (mg/m<sup>2</sup>/day) are monitored via ground-based dust outfall buckets, not by plane. The monitoring programme is re-evaluated on a regular basis as mining and infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report. The existing monitoring points are indicated below (Figure 10 of the EMPr).</p> 
<p>How will this influence the residence Life style?</p>	<p>Nenqe Advance Ogies town 12 Sept 2022</p>	<p>The key findings from the specialist studies and risk assessment indicate that there will be limited new impacts due to the amendment application. Rather, the status quo will continue. If anything, the</p>

COMMENT	STAKEHOLDER	RESPONSE
		proposed amendment will reduce the opencast areas, leading to a reduction in impacts (noise, dust, etc.) in close proximity to the communities.
How will this impact the current houses?	Nenqe Advance Ogies town 12 Sept 2022	Ogies Town and the existing houses will not be undermined, no impact on the houses is therefore envisaged. Houses situated within the mining right area may be impacted by subsidence if undermined; however, a risk assessment will be conducted for the undermining of all infrastructure and a sufficient safety factor determined to prevent any subsidence. This risk assessment must be submitted to the DMRE for approval before mining can commence.
How will this impact the current business in town?	Nenqe Advance Ogies town 12 Sept 2022	<p>The approved and new road alignments are indicated below (Figure 9 in the EMPr). The total length of the proposed (revised) re-alignment is 1.25 km vs original alignment length of 1.28 km. This is a deviation of less than 5% on the total road alignment. It is not foreseen that the re-alignment of the P53-1 will have any impact on the businesses in Ogies. Access to Ogies Town remains unchanged, and no change in traffic volumes is envisaged.</p> 
When will a personal survey be done?	Nenqe Advance Ogies town 12 Sept 2022	In addition to the dust fallout monitoring, a real-time Particulate Matter (PM) monitoring system has been installed in Ogies, at the church building, to measure inhalable dust that could cause respiratory health


COMMENT	STAKEHOLDER	RESPONSE																																																																	
		<p>issues. The monitor delivers simultaneous measurement of PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>1</sub>, and Total Suspended Particulates (TSP).</p> <p>The monitoring data indicates no exceedances in respect of the prescribed limits for the pollutants assessed – refer to S7.2.7.6.2 of the BAR.</p> <div data-bbox="1123 462 1900 971" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>Inhalable Particulate Matter at The Church Building, Ogies</b></p> <table border="1" style="margin-top: 10px; width: 100%; border-collapse: collapse;"> <caption>Estimated Data from Chart</caption> <thead> <tr> <th>Month</th> <th>PM 2.5 (µg/m²)</th> <th>PM 10 (µg/m²)</th> <th>PM2.5 Limit (µg/m²)</th> <th>PM10 Limit (µg/m²)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>15</td><td>18</td><td>25</td><td>75</td></tr> <tr><td>Feb</td><td>12</td><td>18</td><td>25</td><td>75</td></tr> <tr><td>Mar</td><td>15</td><td>18</td><td>25</td><td>75</td></tr> <tr><td>Apr</td><td>10</td><td>15</td><td>25</td><td>75</td></tr> <tr><td>May</td><td>20</td><td>28</td><td>25</td><td>75</td></tr> <tr><td>Jun</td><td>30</td><td>38</td><td>25</td><td>75</td></tr> <tr><td>Jul</td><td>30</td><td>38</td><td>25</td><td>75</td></tr> <tr><td>Aug</td><td>25</td><td>35</td><td>25</td><td>75</td></tr> <tr><td>Sep</td><td>20</td><td>30</td><td>25</td><td>75</td></tr> <tr><td>Oct</td><td>35</td><td>48</td><td>25</td><td>75</td></tr> <tr><td>Nov</td><td>25</td><td>35</td><td>25</td><td>75</td></tr> <tr><td>Dec</td><td>25</td><td>35</td><td>25</td><td>75</td></tr> </tbody> </table> </div>	Month	PM 2.5 (µg/m²)	PM 10 (µg/m²)	PM2.5 Limit (µg/m²)	PM10 Limit (µg/m²)	Jan	15	18	25	75	Feb	12	18	25	75	Mar	15	18	25	75	Apr	10	15	25	75	May	20	28	25	75	Jun	30	38	25	75	Jul	30	38	25	75	Aug	25	35	25	75	Sep	20	30	25	75	Oct	35	48	25	75	Nov	25	35	25	75	Dec	25	35	25	75
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Can feedback be done in person and not only per email letters?	Nenqe Advance Ogies town 12 Sept 2022	Noted.																																																																	
As principal of Rainbow Genie’s Pre-School I understand that the closing date for concerns regarding the GGV Underground Mining Project are today. Up until today no formal Ogies Town Community was held.	Rainbow Genie’s Pre-School & Day Care Principal 12 Sept 2022	<p>The EIA Regulations 2014 stipulate minimum requirements for public participation, which was fully complied with. The EIA Regulations do not require that public meetings be held with IAPs.</p> <p>Focus Group meeting was held with representatives of the registered forums of the Ogies, Phola and surrounding farming communities on 24 August 2022. The Ogies Business Forum, as well as Ward Councillors attended the meeting, amongst others.</p>																																																																	




COMMENT	STAKEHOLDER	RESPONSE
<p>How will this impact the borehole water at the school? When the open cast was started at the back off the school high levels off sulphur was detected in borehole water and GGV installed a filter system.</p>	<p>Rainbow Genie's Pre-School &amp; Day Care Principal 12 Sept 2022</p>	<p>It is unlikely that mining would impact the water quality of boreholes whilst operational. This is due to groundwater flow being toward the mine during the operational phase, and during the stages while mine water levels will recover immediately after mining. Water will only flow from the mine to the boreholes when mine water levels recover sufficiently to such an extent that the groundwater flow is reversed toward a pumping borehole.</p> <p>Sulphur smells are not uncommon in Karoo aquifer water supply boreholes. However, it is unlikely that acid mine drainage will occur from a coal seam that was intersected during the drilling of a borehole [i.e. evaluating the smell from an event that occurred near the borehole]. This would require oxygen conditions, i.e. the groundwater level must draw down deeper than the coal seam and the seam needs to be fractured. Even under these conditions, the significance will be low.</p> <p>The exact location in terms of the west-east Ogies Dyke has not been confirmed. If the borehole is located north of the dyke, the dyke will likely protect the aquifer around the borehole from dewatering. The boreholes should be included in an updated hydrocensus. If agreed upon, they can be tested, and sustainable, safe yields determined for future reference.</p>
<p>How will dust be monitored on ground level? And not +-2Km up in the air by plane.</p>	<p>Rainbow Genie's Pre-School &amp; Day Care Principal 12 Sept 2022</p>	<p>GGV Complex has an established dust fall-out monitoring network. Settleable particles (mg/m<sup>2</sup>/day) are monitored via ground-based dust outfall buckets, not by plane. The monitoring programme is re-evaluated on a regular basis as mining and infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report. The existing monitoring points are indicated below (Figure 10 of the EMPr).</p>

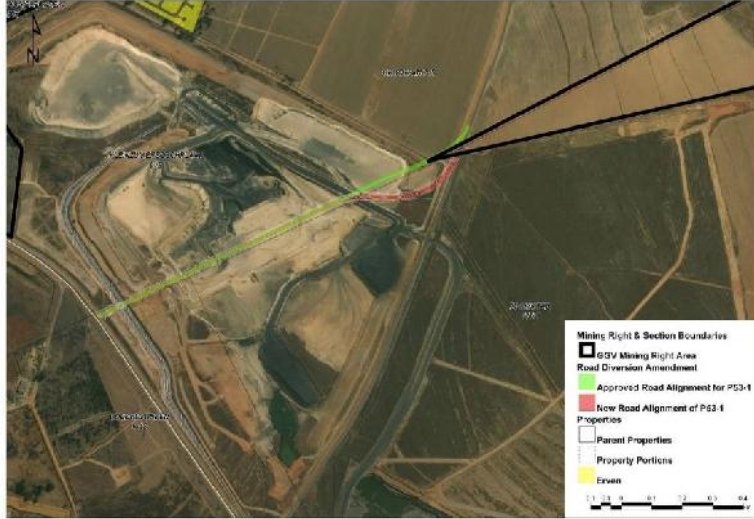
COMMENT	STAKEHOLDER	RESPONSE
		
How will this impact the live term off the school?	Rainbow Genie’s Pre-School & Day Care Principal 12 Sept 2022	The school is situated approximately 100 m north of the proposed underground workings and the existing structures will not be undermined. No impact on the school buildings is therefore envisaged.
How will this impact the lives off our school children?	Rainbow Genie’s Pre-School & Day Care Principal 12 Sept 2022	The key findings from the specialist studies and risk assessment indicate that there will be limited new impacts due to the amendment application. The status quo will remain. If anything, the proposed amendment will reduce the opencast areas, leading to a reduction in impacts (noise, dust, etc.) in close proximity to the communities.
How will this impact the health off the children?	Rainbow Genie’s Pre-School & Day Care Principal 12 Sept 2022	In addition, a real-time Particulate Matter (PM) monitoring system has been installed in Ogies, at the church building, to measure inhalable dust that could cause respiratory health issues. The monitor delivers simultaneous measurement of PM <sub>10</sub> , PM <sub>2.5</sub> , PM <sub>1</sub> , and Total Suspended Particulates (TSP). The monitoring data indicates no exceedances in respect of the prescribed limits for the pollutants assessed – refer to S7.2.7.6.2 of the BAR.

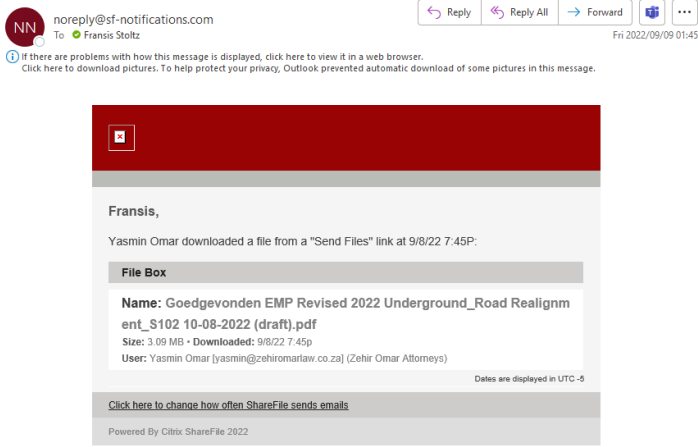
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		<table border="1"> <caption>Inhalable Particulate Matter at The Church Building, Ogies (2020)</caption> <thead> <tr> <th>Month</th> <th>PM 2.5 (µg/m<sup>2</sup>)</th> <th>PM 10 (µg/m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>15</td><td>18</td></tr> <tr><td>Feb</td><td>15</td><td>18</td></tr> <tr><td>Mar</td><td>15</td><td>18</td></tr> <tr><td>Apr</td><td>15</td><td>15</td></tr> <tr><td>May</td><td>20</td><td>28</td></tr> <tr><td>Jun</td><td>30</td><td>38</td></tr> <tr><td>Jul</td><td>30</td><td>38</td></tr> <tr><td>Aug</td><td>28</td><td>35</td></tr> <tr><td>Sep</td><td>22</td><td>30</td></tr> <tr><td>Oct</td><td>35</td><td>48</td></tr> <tr><td>Nov</td><td>28</td><td>35</td></tr> <tr><td>Dec</td><td>25</td><td>32</td></tr> </tbody> </table>	Month	PM 2.5 (µg/m <sup>2</sup> )	PM 10 (µg/m <sup>2</sup> )	Jan	15	18	Feb	15	18	Mar	15	18	Apr	15	15	May	20	28	Jun	30	38	Jul	30	38	Aug	28	35	Sep	22	30	Oct	35	48	Nov	28	35	Dec	25	32
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<p>Will the moving of the road linking the old Ogies-Witbank road with the Ogies-Bethal have any impact on the pre-school life cycle and the transportation of the school children?</p>	<p>Rainbow Genie's Pre-School &amp; Day Care Principal 12 Sept 2022</p>	<p>The 2016 approved EMPr includes the re-alignment of provincial Road P53-1 which links Road R555 and Road 545 on the south-eastern side of Ogies. Environmental Authorisation for the re-alignment of Road P53-1 was granted by the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA) on 8 September 2015 (Ref No 17/2/3N-273). The re-alignment of Road P53-1 has recently been optimised to improve traffic safety in respect of the curvature back into the existing road, as well as to effect minimum impact on coal reserves. This involves just a slight change to the approved alignment which is regarded as safer.</p> <p>The approved and new road alignments are indicated below (Figure 9 in the EMPr). There should be no impact on the pre-school or the transportation of the children. The total length of the proposed (revised) re-alignment is 1.25 km vs original alignment length of 1.28 km. This is a deviation of less than 5% on the total road alignment.</p>																																							

COMMENT	STAKEHOLDER	RESPONSE
		
<p>As far as I understand there was a North Gauteng High Court Ruling that the above road are not to be closed, moved, redirect or changed by GGV.</p>	<p>Rainbow Genie’s Pre-School &amp; Day Care Principal 12 Sept 2022</p>	<p>You are correct that an interim interdict was granted to the Distressed Mining Community of Ogies preventing the closure of the Provincial Road P53-1 between the R555 and the R545. The proposed alignment of the P53-1 forming the subject of the amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1</p>
<p>Hope to receive feedback in person and not per letter or email.</p>	<p>Rainbow Genie’s Pre-School &amp; Day Care Principal 12 Sept 2022</p>	<p>Noted.</p>
<p>Good day, I hereby need know why there was <b>NO</b> community meeting for the OGIES residents and business owners as for the new mining underground activities behind our properties in OGIES.</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>It is noted that the underground mining has been approved on 20 April 2010 (Ref: MP 30/5/1/2/2/343 MR) and this amendment does not constitute new mining activities. This amendment only addresses very slight changes to the approved underground mining schedule that was previously authorised. No additional impacts are envisaged due to the change in mining schedule.</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>We see that the cutoff date is today 12 SEPT 2022 for our input.</p>		<p>The EIA Regulations 2014 stipulate minimum requirements for public participation, which was fully complied with. The EIA Regulations do not require that public meetings be held with IAPs.</p> <p>However, a Focus Group meeting was held with representatives of the registered forums of the Ogies, Phola and surrounding farming communities on 24 August 2022. The Ogies Business Forum, as well as Ward Councillors attended the meeting, amongst others.</p>
<p>YOU NEED TO take note that there is a HIGHCOURT ruling granted in favor of the Distressed Mining Forum Ogies. Lawyers was and still is Mr. ZEHIR OMAR and YASMIN OMAR 0829206922 OR <a href="mailto:YASMINOMAR@VODAMAIL.CO.ZA">YASMINOMAR@VODAMAIL.CO.ZA</a></p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>Noted.</p> <p>You are correct that an interim interdict was granted to the Distressed Mining Community of Ogies preventing the closure of the Provincial Road P53-1 between the R555 and the R545. The proposed alignment of the P53-1 forming the subject of the amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1</p>
<p>How will the dust be monitored .... AS PER AIRPLAIN 1.5 / 2 km in the air BUT THE MAIN PROBLEM IS 500 meters to ground level?</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>GGV Complex has an established dust fall-out monitoring network. Settleable particles (mg/m<sup>2</sup>/day) are monitored via ground-based dust outfall buckets, not by plane. The monitoring programme is re-evaluated on a regular basis as mining and infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report.</p> <p>The existing monitoring points are indicated below (Figure 10 of the EMPr).</p>

COMMENT	STAKEHOLDER	RESPONSE
		
<p>How will this influence our boreholes and buildings?</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>It is unlikely that mining would impact the water quality of boreholes whilst operational. This is due to groundwater flow being toward the mine during the operational phase, and during the stages while mine water levels will recover immediately after mining. Water will only flow from the mine to the boreholes when mine water levels recover sufficiently to such an extent that the groundwater flow is reversed toward a pumping borehole.</p> <p>The exact location in terms of the west-east Ogies Dyke has not been confirmed. If the borehole is located north of the dyke, the dyke will likely protect the aquifer around the borehole from dewatering. The boreholes should be included in an updated hydrocensus. If agreed upon, they can be tested, and sustainable, safe yields determined for future reference.</p> <p>Anemerska Guesthouse will not be undermined, no impact on the buildings is therefore envisaged.</p>
<p>How will you manage the re-routing of the road, so that business will NOT BE AFFECTED by less traffic?</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies</p>	<p>The approved and new road alignments are indicated below (Figure 9 in the EMP). The total length of the proposed (revised) re-alignment is 1.25 km vs original alignment length of 1.28 km. This is a deviation of</p>

COMMENT	STAKEHOLDER	RESPONSE
	12 Sept 2022	<p>less than 5% on the total road alignment. It is not foreseen that the re-alignment of the P53-1 will have any impact on the businesses in Ogies. Access to Ogies Town remains unchanged, and no change in traffic volumes is envisaged.</p> 
How will the vibrations of machines be handled?	A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022	Mining machines used underground are trackless mobile machines. All machines that are used for transporting employees and material will have a minimal impact on underground support structures and pillars. Coal winning machines are not rubber tire machines and will have negligible impact on the support structures underground. None of these machines will impact on the surface ground conditions.
No links can be opened as per the website and visiting the GGV / OGIES office they ONLY give us the link.	A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022	<p>We have tested the download link numerous times during the commenting period and experienced no problems with the link. We have also not received any complaints in this regard or a request for a soft copy of the documents.</p> <p>It is noted that the lawyers of Ogies Distressed Forum did indeed download the document successfully as indicated below.</p>

COMMENT	STAKEHOLDER	RESPONSE
		<p>Yasmin Omar has downloaded a file from the folder 'File Box'</p> 
<p>Please take note that this will not be taken as a joke just to mine as wish .... Glencore operations is BULLYING US AS Ogies community.</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>The key findings from the specialist studies and risk assessment indicate that there will be limited new impacts due to the amendment application. The status quo will remain. If anything, the proposed amendment will reduce the opencast areas, leading to a reduction in impacts (noise, dust, etc.) in close proximity to the communities.</p>
<p>We may be small as a town but this will be taken up and we demand a meeting for the OGIES community and all explanation needed to this new operation.</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>Refer to responses above.</p>
<p>Glencore did not even comply with the first EIA of 1000 meters from houses and people.</p>	<p>A Muller Anemerska Guesthouse / Lodge, Ogies 12 Sept 2022</p>	<p>Noted.</p>
<p>The First Interested &amp; Affected Party is the Distressed Community of Ogies, an unincorporated voluntary association consisting of members who are residents of the town of Ogies, Mpumalanga.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller</p>	<p>Noted.</p>



COMMENT	STAKEHOLDER	RESPONSE
	22 Sept 2022	
The Second Interested & Affected Party is Save the Maize Belt Society, an unincorporated association not for gain. The objects under its constitution are to assist members, to protect and maintain for present and future generations the environmental integrity of an area described as the “maize belt”, and its environs which includes the area between Delmas through to Ogies, Mpumalanga.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted.
The Third Interested & Affected Party is Anne Marie Beatrix Muller, with ID 6403100034081, an adult female residing at 38 Malan Street, Ogies. The Third Interested and Affected Party also carried on business in Ogies, Mpumalanga.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted.
The First, Second & Third Interested & Affected Parties are hereinafter referred to as “the IAPS”.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The parties are registered on the IAP Register.
The IAPs hereby note their objection to the application by the Applicant for the amendment of the Environmental Authorization and Environmental Management Programme relating to the coal mine, Goedgevonden Complex (“GGV”), which is located in Ogies, Mpumalanga.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Your objection has been noted. Please note that the comments were received on 22 September 2022, which is outside the provided comment period which closed on 12 September 2022.
Paragraph 4.2 refers to the aspects concerning interested and affected persons or stakeholders. It states that due to past public participation processes, an existing list of interested and affected persons exist and thereafter reference is made to Appendix 1.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Although previous stakeholder and/or IAP registers were utilized, IAPs were also invited to register through the placement of an advertisement in the Witbank News, placement of onsite notices at various public places and notification letters and a Background Information Document sent to previous stakeholder / IAP lists.
Despite previous litigation with Glencore, the First IAP is not specifically listed as an interested and affected party or stakeholder. However, certain	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save	Members being included under items 45 – 47 in the IAP register indicate that the organization (Distressed Mining Community of Ogies (DMCO)) is indeed registered and specifically listed as an IAP. The DMCO was

COMMENT	STAKEHOLDER	RESPONSE
<p>individuals, as members of the First IAP, are named at items 45 – 47 of Appendix 1.</p>	<p>the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>accordingly notified of the application for amendment of the environmental authorisation and EMPr.</p> <p>The second IAP (Save the Maize Belt Society) did not register as an IAP when registration was invited on 3 June 2022 via the newspaper advertisement and on-site notices. We request that you provide us with a list of the names and contact numbers / email addresses of the members of the second IAP in order to update the IAP register accordingly.</p> <p>It is also noted that on registration of the third IAP, a specific question was asked whether he/she is aware of any other stakeholder / organization that should be registered, and Ms Muller did not make mention of any other organization.</p>
<p>The First IAP, on behalf of its members, previously confronted the Applicant concerning the air pollution, water pollution and damage to the property of the First IAP's members of the community of Ogies. These complaints culminated into litigation before the High Court in Johannesburg. In addition, the First IAP secured an interdict preventing the closure of the provincial road P53-1 between R555 and R545.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Your comment is noted. However, this application does not relate to existing operations and environmental impacts, the management or monitoring thereof. The concerns should be reported to GGV through the established structures and channels of resolution. We are aware of the legal action referred to, which will follow the normal court processes.</p>
<p>The IAPs support the letters of objections submitted by Francisco Vilanculo of 'Siyabonga one for the unemployed' and 'Sgesgede Farm'. These letters pertinently raised issues regarding:</p> <ul style="list-style-type: none"> <li>i. The scarcity of fresh water</li> <li>ii. Security of food supply</li> <li>iii. Poor air quality as a result of dust and fine particulate in the air</li> <li>iv. Dust from unpaved roads</li> <li>v. Erosion</li> <li>vi. Contamination of natural water sources</li> </ul>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Your comment is noted. The aspects referred to in your comment all relate to the existing operations that are authorized in terms of the various existing environmental authorisations, water use licences and EMPrs. The application for amendment of the environmental authorisation and EMPr will most likely reduce, and not increase, some of the impacts associated with the existing operations, especially where opencast mining is changed to underground mining. Any complaints or queries regarding the existing operations, should be reported to GGV through the established structures and channels of resolution.</p> <p>Also refer to the responses to the comments received from Siyabonga One for the Unemployed and Sgesgede Farm below.</p>

COMMENT	STAKEHOLDER	RESPONSE
<ul style="list-style-type: none"> <li>vii. Reduction of grazing land for livestock</li> <li>viii. That ambient air quality is already below acceptable standards</li> <li>ix. Deterioration in the visual aesthetics of the broader region around the current mining operation (i.e. GGv)</li> <li>x. The impacts of blasting on homes</li> <li>xi. Water shortages</li> <li>xii. Continuous eradication of plants and natural habitats for animals</li> <li>xiii. Adverse medical conditions of people around GGv including inhalation of dust and damage to eyes</li> <li>xiv. The impact of changing, diverting or closing existing roads on existing users of land including on their livestock, planting of vegetables for self-sustenance and on the informal traders and small businesses.</li> </ul>		
<p>The IAPs are concerned that the notification published by the Applicant are inadequate to draw the attention of affected persons including:</p> <ul style="list-style-type: none"> <li>i. Those directly affected immediately around the proposed project; and</li> <li>ii. Other organizations which are concerned with the impact associated with mining of non-renewable resources such as coal, on the environment and the economy.</li> </ul>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The on-site notifications and newspaper advertisement complied with the requirements of regulation 41(3) of the EIA Regulations 2014 and provided details of the application, the process followed, the nature and location of the activities and the way further information can be obtained and where comments should be submitted.</p> <p>The Witbank News is a newspaper that is circulated in various local towns including Ogies. On-site Notices were also placed in Ogies at the various points as indicated in the Public Participation Report.</p> <p>Stakeholders on the initial IAP register were also specifically notified via email and sms. The first and third IAPs, as well as other IAPs reacted to the notifications and advertisement, and registered as IAPs and submitted comments.</p>

COMMENT	STAKEHOLDER	RESPONSE
		Various methods were utilised to encourage IAPs to register and participate in the amendment application. These methods are in compliance with the legislation.
Emalahleni is located 50km from GGV. Delmas which is situated in the Victor Khanye Local Municipality, is situated in closer proximity. Despite this, advertisements were placed in the Witbank News, 50km away. What this means is that notice put up by the Applicant were not appropriately tailored to elicit a bona fide two-way engagement between the Applicant and those interested and affected by the Applicant's conduct.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	GGV is 40km from Emalahleni, whereas Delmas is 53km from GGV. The Witbank News is a newspaper that is circulated in various local towns including Ogies. On-site Notices were also placed in Ogies at the various points as indicated in the Public Participation Report.  In addition, email and sms notifications were sent to IAPs on the IAP register.
It is submitted that the advertisement is inadequate on this ground, and that the advertisement enclosing the notification should be placed in national newspapers in light of the far-reaching impacts of coal mining on the environment, including on air quality, the economy, climate change and international law obligations.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	You are referred to NEMA Section 47D and regulation 41 of the EIA Regulations 2014. The legislation only requires placement in a provincial or national newspaper where an activity (in this case the amendment of an existing authorised activity) will have an impact beyond the boundaries of the district municipality (in this case Nkangala District Municipality). It should be again noted that this is an amendment application. The amendments proposed will not have an impact beyond the boundaries of the district municipality. As stated above, the application for amendment of the environmental authorisation and EMPr will most likely reduce, and not increase, some of the impacts associated with the existing operations, especially where opencast mining is changed to underground mining.
The Applicant is intentionally avoiding the establishments and/or expansion of harmful coal mines.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The application is for the amendment of an already existing and authorised mine and is not a new application for the establishment or expansion of a mine.
If advertisements were distributed widely – both in the district, the region and nationally – as the law requires them to be, then the consultation process would be more likely to yield meaningful results, fulfilling the objectives of the consultation	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller	The public participation process undertaken complies with the legal requirements as provided for in the EIA Regulations 2014.

COMMENT	STAKEHOLDER	RESPONSE
process and protecting the affected constitutional rights.	22 Sept 2022	
The draft BAR and EMPR, being made available to all registered interested and affected persons or stakeholders for a mere 30 calendar days is wholly inadequate.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The public participation process undertaken complies with the legal requirements as provided for in the EIA Regulations 2014. In terms of the EIA Regulations 2014, the draft BAR and EMPr must be made available to all registered interested and affected parties for at least 30 days. GGV complies with the aforesaid legal requirements.
The inadequate time period undermines the magnitude of the expansion proposed the constitutional rights of the IAPs.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The amendment application is not for the expansion of the mine. As stated above, the application for amendment will most likely reduce, and not increase, some of the impacts associated with the existing operations, especially where opencast mining is changed to underground mining. Furthermore, the timeframe provided for comments in respect of the draft BAR and EMPr is aligned with the requirements of the EIA Regulations 2014.
The documents requiring consideration are lengthy and complex. They require assistance not only by experienced legal representatives but experts in aspects concerning the economy, water resources, noise pollutions, dust pollution and coal mining.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The timeframe provided for comments in respect of the draft BAR and EMPr is aligned with the requirements of the EIA Regulations 2014. The IAPs had sufficient time to consider the draft BAR and EMPr and to submit comments to the EAP. The IAPs did not engage with the EAP regarding the timeframe available for the review of and comments on the draft BAR and EMPr.
Since the proposed project relating to GGV is situated in a rural area which is plagued by poor infrastructure and a significant portion of people who are unemployed or indigent, the distribution of notices for download off the internet, is likely to be in adequate.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Various methods were utilised, such as notices via text message (sms) but also on-site notices that were placed at various places within the rural area surrounding the existing GGV mine.  The draft BAR and EMPr were made available for review at public places within Ogies and Phola for review by stakeholders from 11 August to 12 September 2022.
People would require not only internet connection but mobile or computer devices which connect to the internet and which are able to view and store large data files containing complex information.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The draft BAR and EMPr were made available for review at public places within Ogies and Phola for review by stakeholders.
The suggestion in paragraph 4.6.3 that free Wi-Fi hotspots situated in the town section remedies	Zehir Omar Attorneys obo Distressed Mining	The draft BAR and EMPr were made available for review at public places within Ogies and Phola for review by stakeholders.

COMMENT	STAKEHOLDER	RESPONSE
<p>this difficulty is unhelpful, and does not cure the problem of access, because not everyone is in possession of devices that can access the internet. Further to this, the majority of the population of Ogies live in the nearby township of residential areas, which are out of range of any free Wi-Fi areas.</p>	<p>Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	
<p>Noteworthy is the absence of any report concerning the number of downloads on the free Wi-Fi hotspots and/or the number of persons who possess suitable devices.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The draft BAR and EMPr were made available for review at public places within Ogies and Phola for review by stakeholders.</p>
<p>The placement of hardcopies at “central public places” is similarly inadequate because a significant portion of the population in Ogies is either unemployed, indigent and unable to read or understand the documents. Further noteworthy is the absence of any study in the Socio-Economic Impact Assessment concerning the number of persons who are literate or likely to understand the documents, their affected rights and the applicable procedures.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Provision was made to engage underprivileged communities through their registered representatives. The Background Information Document circulated was also translated to the predominant local language. The community members who are unable to read and understand the draft BAR and EMPr, could have contacted the EAP and requested assistance.</p>
<p>Whilst paragraph 4.6.2 conveys the alleged percentage of persons who speak certain languages, that they speak the language does not necessarily mean they are literate or able to read in that language.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Refer to response above.</p>
<p>Lastly, neither the draft EMPR or notifications explain what “stakeholder analysis” denotes. There is no evidence that the interested and affected persons were involved in the dearth of studies conducted which underpin the notification or the documents requiring comment.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The public participation process undertaken complies with the legal requirements as provided for in the EIA Regulations 2014. The public participation process included stakeholder and IAP engagement.</p>

COMMENT	STAKEHOLDER	RESPONSE
The consultation process appears to be a mere ticking of the checklist. As a result, the interested and affected persons have not been consulted in a bona fide substantive two-way process which is aimed at achieving consensus especially in relation to what the process entails and the import thereof.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The public participation process undertaken complies with the legal requirements as provided for in the EIA Regulations 2014, and is in accordance with what was agreed with the Competent Authority.
The AQIA report has not been prepared independently of the Applicant neither has information been secured by the experts themselves. It appears that the Report is prepared based on unverified third-party information obtained from the Applicant itself.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The air quality monitoring data was sourced from Glencore. It is however noted that the data is collected and analysed by an independent laboratory, Aquatico. The Glencore data was supplemented by available regional data.
For this reason, the disclaimer in the AQIA specifically notes that the drafters do not stand by the accuracy of the information received, on which the report was prepared.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	See previous response.
The disclaimer goes further by affirming that the report is not a complete identification of the risks associated with the project and the study conducted, are should not be accepted as the only risks.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The disclaimer confirms that the study does not include all risks associated with the project, but only air quality risks. The air quality risks and impacts that have been identified is considered to be accurately assessed and thought through based on the available data.  The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, but rather a continuation of existing impacts on the socio-economic and physical environment. The proposed amendment will, in all likelihood, reduce the opencast areas with the subsequent reduction in impacts in close proximity to the communities.
Most concerning is that the report has been prepared on a specific and agreed basis. The nature and extent of this basis has not been disclosed. To this extent, the IAPs are obviously prejudiced in that they are unable to meaningfully engage and consult in a two-way process,	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	The specialists have been appointed on a time-cost basis, with an agreed Scope of Work as compiled by the independent EAP. The applicant (Glencore) does not prescribe the scope of work, nor the outcome of the specialist studies.

COMMENT	STAKEHOLDER	RESPONSE
impugning the integrity of this stage of the process as well.		Besides, the specialist report has been compiled in compliance with Appendix 6 of the EIA Regulations 2014, which prescribes the minimum report content requirements.
The draftees have specifically stated that the report should not be relied on by any other entity.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	See previous response. The statement merely confirms that the air quality study cannot be used for any other purpose but the application for amendment submitted to the DMRE for consideration.
Therefore, the AQIA is neither an accurate assessment based on reliable information concerning the air quality associated with the project relating to GGv, nor can it be a source of reference.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	This is denied. See previous responses.
There is therefore no proper air quality impact assessment and the application concerning the amendment of the Environmental Authorization and EMPR should be refused on this basis alone.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	This is denied. See previous responses.
As part of the terms of reference, paragraph 1.2 states that the baseline assessment involved, allegedly, review of applicable legislation and policies relating to air quality management which are applicable to the proposed operations, review of potential health effects associated with emissions released from the proposed operations, assessment of the baseline air quality using available ambient air quality monitored data, comparison of modelled results to the national ambient air quality standards to determine compliance and to provide recommendations for the implementation of appropriate mitigation measures and the monitoring program.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Refer to the AQIA that deals with each of the issues as per the scope of work.



COMMENT	STAKEHOLDER	RESPONSE
<p>With reference to paragraph 2.3, it is important to note that for the purpose of the HPA, there are no stations monitoring the location or area surrounding GGV in Ogies, which is the subject of the amendment applications. The closest monitoring station is 50 km- in other words, 50 000 m - away from the area concerned.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>GGV is located in the Highveld Priority Area. Para 2.3 provides background information on the areas included in the HPA as well as the air quality monitoring stations within the priority area that is managed by the DFFE.</p>
<p>There is therefore no data concerning the direct impact of the existing GGV mine on the data collected relating to the HPA. Other than acknowledging the existence of the HPA, the AQIA is hopelessly sparse as far as the HPA is concerned.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The HPA was developed and is managed by the DFFE. As indicated above, the AQIA merely provides background information on the HPA. This assessment was not to scrutinize the HPA monitoring data and/or action plans.</p>
<p>In paragraph 2.1.3, the guideline and number of exceedances allowed for PM10 and PM 2.5 is listed. However, no further information regarding the extent of PM10 and PM2.5 emitted or associated directly or indirectly with the current GGV mine or that will be potentially associated with the proposed expansion, is explained.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Para 2.1.3 provides the legal requirements and ambient standards. It does not address the impact associated with the existing GGV operation – this is dealt with in Chapter 4 and specifically in Table 4-4 and Table 4-5.</p>
<p>The absence of any further elaboration on PM10 and PM2.5 in this regard is more problematic having regard to the fact that PM 10 and PM 2.5 are listed as pollutants which are measured as part of the monitoring process relating to the HPA. Having regard to the AQIA, it is uncertain whether monitoring pollutants from 50 km away is effective or of any use. In any event, the IAPs assert that the gravity of the poor air quality problem in the HPA, and the seriousness of the impacts associated with the HPA, is undermined by both the Applicant and the existing monitoring measures.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>As indicated in Para 3.2, a real-time Particulate Matter (PM) monitoring system has been installed in Ogies, at the church building, to measure inhalable dust that could cause respiratory health issues. The monitor delivers simultaneous measurement of PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>1</sub>, and Total Suspended Particulates (TSP). The monitoring data indicates no exceedances in respect of the prescribed limits for the pollutants assessed. Also refer to S7.2.7.6.2 of the BAR.</p>

COMMENT	STAKEHOLDER	RESPONSE																																							
		<table border="1"> <caption>Inhalable Particulate Matter at The Church Building, Ogies (2020)</caption> <thead> <tr> <th>Month</th> <th>PM 2.5 (µg/m<sup>2</sup>)</th> <th>PM 10 (µg/m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>15</td><td>18</td></tr> <tr><td>Feb</td><td>15</td><td>18</td></tr> <tr><td>Mar</td><td>15</td><td>18</td></tr> <tr><td>Apr</td><td>15</td><td>15</td></tr> <tr><td>May</td><td>20</td><td>28</td></tr> <tr><td>Jun</td><td>30</td><td>38</td></tr> <tr><td>Jul</td><td>30</td><td>38</td></tr> <tr><td>Aug</td><td>28</td><td>35</td></tr> <tr><td>Sep</td><td>22</td><td>30</td></tr> <tr><td>Oct</td><td>35</td><td>48</td></tr> <tr><td>Nov</td><td>28</td><td>32</td></tr> <tr><td>Dec</td><td>25</td><td>30</td></tr> </tbody> </table>	Month	PM 2.5 (µg/m <sup>2</sup> )	PM 10 (µg/m <sup>2</sup> )	Jan	15	18	Feb	15	18	Mar	15	18	Apr	15	15	May	20	28	Jun	30	38	Jul	30	38	Aug	28	35	Sep	22	30	Oct	35	48	Nov	28	32	Dec	25	30
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<p>To this extent, there is clearly inadequate consideration for the HPA and the application for amendment of the environmental authorization and environmental monitoring program should be refused on this basis alone.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>As indicated above, the HPA is not the subject of this assessment, it is for an amendment to an existing, authorized mine which will continue regardless of the amendment.</p> <p>The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment. If anything, the proposed amendment will reduce the opencast areas with the subsequent reduction in impacts in close proximity to the communities.</p>																																							
<p>The meteorological data obtained from the South African Weather Services is for the moment unreliable. It is unclear whether the South African Weather Services has provided data relating to Emalahleni or Ogies. In fact, the average relative humidity data is provided for Emalahleni, which is 50km away from Ogies.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The IAPs do not substantiate or provide reasons for the statement that the data from the South African Weather Service is unreliable. The meteorological data is considered to be more than reliable for the purpose of this assessment. In meteorological terms, 50km is not far and very similar weather patterns are experienced in Ogies and Emalahleni.</p>																																							

COMMENT	STAKEHOLDER	RESPONSE
<p>The report is unhelpful in regard to other pollutants in the area which is the subject of this application. Paragraph 2.5 notes that the detailed emissions inventory for the area is not available. For this reason, there is obviously no accurate consideration for the cumulative impacts of pollution and other polluters in the area. Noteworthy is the comments relating to the coal-fired power stations referred to in paragraph 2.5.2 as the "major contributors" to poor air quality in the region.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>There is no detailed emissions inventory for the Ogies area and the development of such an inventory, which would take many years of research and monitoring, is not the subject of this report.</p>
<p>It is critical that there has not been consideration for the cumulative impacts of GGV and the proposed expansion, on the general air quality of Ogies, the surrounding areas, Delmas, and on the HPA.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>As noted before, this is not an application for an expansion, only for an amendment to the existing EA and EMPr to facilitate limited changes to the approved mining schedule. The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment. If anything, the proposed amendment will reduce the opencast areas with the subsequent reduction in impacts in close proximity to the communities.</p>
<p>The IAP's require the detailed emissions inventory referred to herein in order to meaningfully comment and secure the services of their own experts to comment in this regard.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>There is no detailed emissions inventory for the Ogies area and the development of such an inventory, is not the subject of this report.</p>
<p>As stated, the site of the project falls within a <i>priority</i> area, i.e. the HPA.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>This is correct.</p>
<p>Mpumalanga accounts for about 83 percent of South Africa's coal production, and Eskom owns the 12 (of its 15) coal-fired power plants located in the area in and around the HPA.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save</p>	<p>Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.</p>

COMMENT	STAKEHOLDER	RESPONSE
	the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	
The area has been plagued with deadly air quality for decades, with the high concentration of coal-fired power plants in the province, Sasol's coal-to-liquids plant located in Secunda, and the NatRef refinery in Sasolburg contributing large amounts of pollution.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.
In an independent study attached hereto, Dr Andy Gray, an expert in air and health risk modelling, found that these 14 facilities were responsible for the lion's share of air pollution in 2016. We request that this report be read as if specifically incorporated herein.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment and the report do not relate to the application for the amendment of the environmental authorisation and the EMPr.
Human exposure to toxic chemical compounds emitted by the coal plants, such as sulphur dioxide, heavy metals like mercury, and fine particulate matter, results in chronic respiratory illnesses such as asthma, bronchitis, and lung cancer, and contributes to strokes, heart attacks, birth defects, and premature death.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.
Section 18(1) of the National Environmental Management: Air Quality Act, 2004 (AQA) provides for the declaration of an area as a priority area if the MEC or Minister reasonably believes that: <ul style="list-style-type: none"> <li data-bbox="247 1089 758 1279">i. ambient air quality standards (AAQS) are being, or may be, exceeded in the area, or any other situation exists which is causing, or may cause, a significant negative impact on air quality in the area; and</li> <li data-bbox="247 1284 758 1370">ii. the area requires a specific air quality management action to rectify the situation.</li> </ul>	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted.

COMMENT	STAKEHOLDER	RESPONSE
<p>iii. A priority area air quality management plan (AQMP) must be developed to coordinate air quality management (AQM) in the area; address air quality issues; and provide for its implementation by a committee representing relevant role players.</p> <p>iv. The aim of declaring priority areas is to target limited AQM resources to the areas that require them most. Once an AQMP is implemented, air quality in the area should - within agreed timeframes - be brought into sustainable compliance with AAQS.</p> <p>v. AQA provides that the Minister may withdraw the declaration of an area as a priority area if the area is in compliance with AAQS for a period of at least two years.</p>		
<p>The air quality within the area falling within the Emalaheni, Victor Khanye Municipality and consequently within the project area, is a matter of serious concern, with industries, including coal-fired power stations, emitting pollutants such as sulphur dioxide (SO<sub>2</sub>), nitrous oxides (NO<sub>x</sub>), and particulate matter (PM). Coal-fired power stations such as Kendal Power Station, Duvha Power Station and Kusile Power Station, situated in close proximity to Ogies, also emit significant quantities of other harmful pollutants such as carbon dioxide (CO<sub>2</sub>) (which is also a greenhouse gas that contributes directly to global warming) and mercury.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.</p>
<p>Although the intended AQMP for the WBPA is still in draft format, its goals include:</p>	<p>Zehir Omar Attorneys obo Distressed Mining</p>	<p>Noted. The comment and does not relate to the application for the amendment of the environmental authorisation and the EMPr. It is not</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>i. emission control and reduction across all sectors to ensure that there is compliance with the national AAQS in the WBPA;</p> <p>ii. addressing the shortcomings in cooperative governance by ensuring the appropriate structures and mechanisms are in place at the respective levels of governance for effective implementation of the AQMP;18 and</p> <p>iii. that air quality decision making in the WBPA is informed by sound research. This requires that appropriate research establishes the health baseline, which improves the threat assessment and prioritises emission reduction interventions to inform air quality management and planning in the WBPA.</p>	<p>Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>sure what “WBPA” means or refers to. If the IAPs are referring to the “Waterberg Bojanala Priority Area” as the WBPA, it is noted that the existing mining operations are not located within the WBPA, but the HPA. The comments relating to the WBPA are clearly not applicable to the application for amendment of the environmental authorisation and the EMPr.</p>
<p>In addition, the draft WBPA AQMP Threat Assessment on the WBPA ("the threat assessment") stipulates that, "<i>[t]he greatest potential threat to ambient air quality exists in the Victor Khanye Local Municipality through the planned expansion of energy-based projects and coal mining in the district. The planned development poses a threat to human and environmental health in the region and it poses challenges for air quality management in the region.</i>"</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Noted. The comment and does not relate to the application for the amendment of the environmental authorisation and the EMPr. It is not sure what “WBPA” means or refers to. If the IAPs are referring to the “Waterberg Bojanala Priority Area” as the WBPA, it is noted that the existing mining operations are not located within the WBPA, but the HPA. The comments relating to the WBPA are clearly not applicable to the application for amendment of the environmental authorisation and the EMPr.</p>
<p>The ongoing addition and expansion of coal mines, that already permeate the HPA including Delmas, Arbor, Ogies and Witbank area, coupled with the close proximity of Kusile, Kendal and Duvha, coal-fired power stations, with all of their significant</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller</p>	<p>As noted before, this is not an application for an expansion, only for an amendment to the existing environmental authorisation and the EMPr to facilitate limited changes to the approved mining schedule. The existing, authorised mining activities will continue regardless of this amendment application.</p>

COMMENT	STAKEHOLDER	RESPONSE
and harmful atmospheric emissions, will clearly be contrary to the air quality management intentions for the WBPA and the goals of the draft AQMP.	22 Sept 2022	
<p>Glencore's application for the amendment of the environmental authorization and its draft environmental management program fails to acknowledge and/or consider:</p> <ul style="list-style-type: none"> <li>i. the existence or location of South 32, Zibulo Colliery, Seriti Klipspruit, Mbuyelo Colliery etc;</li> <li>ii. Environmental authorizations and water use licenses which may be granted and be in existence in respect of the mining operations mentioned above;</li> <li>iii. the overall impact on the environment, and of water use by the proposed project should it exist and operate simultaneously with the mining operations mentioned above.</li> </ul>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>As noted before, this is not an application for an expansion, only for an amendment to the existing environmental authorisation and the EMPr to facilitate limited changes to the approved mining schedule. The existing, authorised mining activities will continue regardless of this amendment application.</p> <p>The key findings from the specialist studies and risk assessment indicate that there will be limited new impacts due to the amendment application. The status quo will remain. If anything, the proposed amendment will reduce the opencast areas, leading to a reduction in impacts (noise, dust, etc.) in close proximity to the communities.</p>
<p>In this regard, the Applicant nowhere addresses each identified potentially significant impact including the nature of the impact, the extent and duration of the impact, the probability of the impact occurring, the degree to which the impact can be reversed, the degree to which the impact may cause irreplaceable loss of resources and the degree to which the impact can be mitigated.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The comment is denied, all impacts associated with the amendment application have been identified and assessed. Refer to section 8.3 and Table 42 of the BAR.</p>
<p>The Applicant's failure to deal with the impact of its planned expanded mining activity, together with the mining activity of the other mining operations which began and/or expanded since the application for the environmental authorization was submitted and approved, would have on <i>climate change</i> is grounds relied upon to</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>As noted before, this is not an application for an expansion, only for an amendment to the existing environmental authorisation and the EMPr to facilitate limited changes to the approved mining schedule. The existing mining activities will continue regardless of this amendment application. Furthermore, as stated above, the proposed amendment will, in all likelihood, reduce the impacts associated with the existing mining operations, including opencast areas with the subsequent reduction in impacts in close proximity to the communities.</p>

COMMENT	STAKEHOLDER	RESPONSE
object to the approval of the application to amend the environmental authorization and eMPR.		
Section 240(1 )(b)(iv) provides that a decision-maker must take into account " <i>where appropriate, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment</i> ".	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. Development alternatives associated with this amendment are discussed in Section 6.2 of the BAR.
It is submitted that a suitable alternative in the circumstances would be to abandon implementation of the proposed project entirely, otherwise known as the "no-go option" and referred to as a "do-nothing alternative". There is no need for the project on a national scale, and "the do nothing option will therefore not address this national need and may result in the electricity demands in the country not being met in the short term"	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	<p>The no-go option was addressed in Section 6.3 of the BAR.</p> <p><i>The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.</i></p> <p><i>Mining activities and associated employment benefits and SLP contribution will continue regardless of whether this amendment is approved or not. However, if the decision is taken not to approve the proposed amendments, some of the benefits discussed in Section 5 may reduce slightly, i.e. tax contribution, capital formation. The LOM may also reduce slightly, thereby reducing the supply to Eskom for power generation.</i></p> <p><i>There will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment. Existing impacts on the environmental and local communities will continue regardless of this amendment.</i></p>
The Applicant failed to indicate why renewable energy sources cannot be used as a suitable alternative to the proposed expanded operation, and why it only considers coal as a source to mine and for power generation.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	As noted before, this is not an application for an expansion, only for an amendment to the existing EA and EMPr to facilitate limited changes to the approved mining schedule. The existing mining activities will continue regardless of this amendment application.
In light of the negative impacts associated with coal mines and coal-fired power stations and the	Zehir Omar Attorneys obo Distressed Mining	Refer to the responses above.



COMMENT	STAKEHOLDER	RESPONSE
<p>dire shortage of water in the area - likely to worsen as a result of climate change within the timescale of this project - it is submitted that it is an unacceptable justification to rule out feasible alternatives; especially when the Applicant does not make any proper attempt to consider and evaluate these as is required by NEMA.</p>	<p>Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	
<p>It is submitted that the proposed site of the project remains ideal for maize farming or could have potential as a site for solar power generation, or other renewable energy sources. Without the necessary technical data and research information, our clients are not in a position to make submissions on the suitability and generation capacity of the project site of for specific renewable energy generation through, for instance, coal or wind. However, it is submitted that the Applicant should have considered this possibility and required that feasibility studies for renewable energy sources - as an alternative to coal – be conducted as part of the EIA.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The mining is an existing and already authorised operation, and alternative land use is not appropriate at this time. It seems the comment has been copied from comments submitted for new applications in the area as no maize farming is conducted within the mining right area.</p>
<p>Given the scarcity of water resources in the area and the substantial water requirements of the project; the cumulative and other environmental impacts of the project, the related detrimental health impacts and the potential for renewable power generation on the site, it is submitted that it would be appropriate to consider both the 'no-go option', and the possibility of renewable energy as a feasible alternative to the project in the circumstances.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Refer to responses above.</p>
<p>It must also be noted that African Rainbow Minerals and the Applicant portray and market themselves as having <i>unique expertise</i> in .... <i>renewable energy and energy efficiency</i>". In the circumstances, it can be assumed that Glencore</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller</p>	<p>GGV Complex is an existing operational mine, operating under Mining Right No. MP 30/5/1/1/2/169 MR and has an approved EMPr. Mining is therefore the selected (approved) land use going forward, as approved.</p>

COMMENT	STAKEHOLDER	RESPONSE
have the resources, technological knowledge and experience at their disposal to substitute the proposed coal mines for more than appropriate renewable alternatives, or continued maize farming.	22 Sept 2022	It is noted that there is no maize farming conducted in the MR area.
Furthermore, the Applicant cannot feign ignorance of the dire need to shift the energy sector towards cleaner carbon-emission-free alternative energy sources.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Glencore PLC has set targets for the reduction of its total carbon emission (Scope 1, 2 and 3) worldwide, namely: <ul style="list-style-type: none"> <li>• Short-term (2026): Target of 15% reduction in total CO2e emissions.</li> <li>• Medium-term (2035): Target of 50% reduction in total CO2e emissions.</li> <li>• Long-term (2050): Target of achieving net zero total CO2e emissions.</li> </ul> Refer to Section 2.2.4.5 of the EMPr.
In light of the above, it is submitted that the Applicant has failed to comply with Section 240(1)(b)(iv) of NEMA. By doing so, it has also failed to take relevant considerations into account.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	This comment is denied. Refer to the responses above.
Section 240(1)(b)(viii) NEMA provides that a decision maker must consider "any guidelines, departmental policies, and environmental management instruments that have been adopted in the prescribed manner by the Minister or MEC, with the concurrence of the Minister, and any other information in the possession of the competent authority that are relevant to the application".	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted.
It is submitted that the Applicant in applying to amend the authorisation, has failed to take into account the National Climate Change Response White Paper (the "White Paper") which "presents the South African government's vision for an effective climate change response and the long-	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	As noted before, this is not an application for an expansion of an existing mine, or a new application for environmental authorisation for a new mine. The application is for the amendment to the existing environmental authorization and EMPr to facilitate limited changes to the approved mining schedule. The existing mining activities will continue regardless of this amendment application.

COMMENT	STAKEHOLDER	RESPONSE
term, just transition to a climate-resilient and lower carbon economy and society."		It is further noted that the National Climate Change Response White Paper is not a "guideline, departmental policies, and environmental instruments" as contemplated in section 240 of the NEMA.
It acknowledges, <i>inter alia</i> , that: "although there will be costs associated with South Africa's adaptation and GHG [greenhouse gas] emission reduction efforts, there will also be significant short and long term social and economic benefits ... "	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.
Furthermore various economic studies have shown that the costs of early action will be far less than the costs of delay and inaction". In its objectives, it records that it will "effectively manage inevitable climate change impacts through interventions that build and sustain South Africa's social, economic and environmental resilience and emergency response capacity [and] make a fair contribution to the global effort to stabilise GHG concentrations in the atmosphere.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.
This White Paper confirms, among other things, that "South Africa is a water scarce country with a highly variable climate and has one of the lowest run-offs in the world - a situation that is likely to be significantly exacerbated by the effects of climate change."	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.
The White Paper indicates clearly the intention of the government to take positive steps to address issues of air quality and climate change in South Africa. In applying to amend the environmental authorization and eMPR, to grant same to Glencore would directly contradict these intentions and consequently contravene section 240(1 )(b)(viii) NEMA.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. The comment does not relate to the application for the amendment of the environmental authorisation and the EMPr.

COMMENT	STAKEHOLDER	RESPONSE
<p>Whilst paragraph four covers aspects relating to the potential impact of GGv, it is stated that the construction and decommissioning phases of the operation can only qualitatively be addressed due to the variability and unpredictable nature of the construction operations on site. Accepting for the moment the impact assessment in this regard, paragraph 4. 7 concludes that the daily limits of PM 10 and PM 2.5 are exceeded offsite at the road and rail siding and at the border of the town.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Dispersion modelling simulations were undertaken to determine the potential air quality impacts associated with the existing and future mining operations. The patterns generated by the contours are representative of the maximum (worst-case) predicted ground level concentrations for the averaging period being represented and does not necessarily indicate actual measurements.</p>
<p>These exceedances require further investigation by experts including the impact on air quality, respiratory health and on the HPA. The Applicant should be required to conduct this study before proceeding further.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>Dispersion modelling simulations were undertaken to determine the potential air quality impacts associated with the existing and future mining operations. The patterns generated by the contours are representative of the maximum (worst-case) predicted ground level concentrations for the averaging period being represented and does not necessarily indicate actual measurements.</p> <p>GGV Complex has an established dust fall-out monitoring network. The monitoring programme is re-evaluated on a regular basis as mining and infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report. The data is evaluated against acceptable standards and where exceedances are noted, the necessary action is taken to reduce the impacts.</p>
<p>Of particular concern is the overall impact on the operational impact and disruption of daily living and movement patterns, deterioration of the local sense of place, operational work or health impacts and further entrenchment of dependence on mine operations for economic function. Continued engagement and establishment of consultative forms does not assist mitigate these issues. This proposal is simply inadequate and insensitive to the plight of the common population and IAPs.</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022</p>	<p>The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment. If anything, the proposed amendment will reduce the opencast areas with the subsequent reduction in impacts in close proximity to the communities.</p>
<p>The first IAP secured an interim interdict against the Applicant on 30 March 2017, interdicting the closure of the provincial road P53-1 pending the</p>	<p>Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save</p>	<p>The interim interdict was granted to the DMCO preventing the closure of the Provincial Road P53-1 between the R555 and the R545. The proposed alignment of the P53-1 forming the subject of the</p>

COMMENT	STAKEHOLDER	RESPONSE
allocation by the Deputy Judge President and hearing of the main application under case number 2017/10546.	the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1.
This court order has not been taken into consideration in any of the studies or reports underpinning the applications for amendment.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	As stated above, the proposed alignment of the P53-1 forming the subject of the amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1.
A court order remains valid and binding until set aside.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted.
Accordingly, the applications for amendment including the proposed expanded project must be held in abeyance until finalisation of the main application under case number 2017-10546, until such time that the interim interdict is no longer of force and effect.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	As stated above, the proposed alignment of the P53-1 forming the subject of the amendment application, has been updated and does not represent the alignment and closure which previously formed the subject of the litigation. Insofar as a portion of the P53-1 will be closed in future, relevant applications will be made for the closure of the relevant portion of the P53-1.
The IAPs reserve their right to amend or vary these comments and objections upon receipt of the outstanding and/ or incomplete information referred to above and upon receipt of detailed information concerning the properties in Ogies, which have been damaged by the ongoing mining activity in Ogies.	Zehir Omar Attorneys obo Distressed Mining Community of Ogies / Save the Maize Belt Society / Anne Marie Beatrix Muller 22 Sept 2022	Noted. All comments relating to the existing application have been addressed above.  Any other documents or information requested outside the amendment application process, should be addressed directly with GGV through the appropriate channels.

## 2.3 PHOLA TOWN STAKEHOLDERS

COMMENT	STAKEHOLDER	RESPONSE
<p>Dispute their upgrade and renewal of their license due to the following facts that have been identified as possible impacts:</p> <ul style="list-style-type: none"> <li>▪ first of all we must remind ourselves that water is only one natural resource that we left with as a community and the fact that it is also a scarcity in this region it must be protected with all costs.</li> <li>▪ Glencore especially Goedgevonden operation has drastically failed our community, they did all with all their powers to infringe the rights of the people previously.</li> <li>▪ as the community we like also to reserve our land that we left with as heritage sites, grazing fields and agricultural space hence we all aware of the fact that mining is no longer favorable to our economy and it does not guarantee us a better life as affected families.</li> <li>▪ it does not give direct benefits for the owners of this land, families that depends on those forms which they extract minerals from it they are not even prioritize.</li> <li>▪ no plan for future food security.</li> </ul>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The comment is noted. The application is not for the renewal of the mining right or any of the other authorisations or licences held by Glencore / GGV. GGV Complex is an existing operational mine, operating under Mining Right No. MP 30/5/1/1/2/169 MR and has an approved Environmental Management Programme (EMPr). The application is for the amendment of an existing environmental authorisation and the EMPr.</p> <p>The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.</p> <p>Mining activities and associated employment benefits and Social and Labour Plan (SLP) contribution will continue regardless of whether this amendment application is approved or not.</p> <p>Any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.</p>
<ul style="list-style-type: none"> <li>▪ Potential negative impact on ambient air quality as a result of increased nuisance dust and fine particulate levels, likely to occur as a result of materials handling activities (tipping, loading and off-loading), vehicle entrainment of dust on unpaved roads, and wind erosion from open/ exposed areas; natural water streamline is being contaminated; reduce the capacity of grazing land for livestock.</li> </ul>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment. If anything, the proposed amendment will reduce the opencast areas with the subsequent reduction in impacts in close proximity to the communities. Existing impacts on the environmental and local communities will continue regardless of this amendment.</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>Spontaneous combustion on the discard facility resulting in:</p> <ul style="list-style-type: none"> <li>▪ Increased levels of fugitive emissions (i.e. air pollution) and non-compliance with the NEM: All when the ambient air quality standards are exceeded;</li> <li>▪ Increased occupational exposures to the combustion gasses;</li> <li>▪ Instability within the discard facility and an increased risk of collapses due to voids being formed as the discard burns within the facility; and</li> <li>▪ Increased risk of occupational injuries and/or losses of equipment due to burns, smoke inhalation, and/or collapse.</li> </ul>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The amendment application does not relate to the discard facility. The Mine Residue Facility (MRF) is an approved facility that has been operational since 2009.</p> <p>As stated above, any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.</p>
<p>Potential negative impact on visual aesthetics of the broader region, particularly since the discard facility will remain a permanent visible feature of the landscape.</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The amendment application does not relate to the discard facility.</p> <p>The amendments to the environmental authorisation and EMPr include, amongst others, changes to the mining schedule to include additional underground areas not approved previously, and to change the mining method from opencast to underground in certain areas. The underground mining will not have an increased visual impact on the surrounding area.</p> <p>The management of the MRF during the operational phase continues in terms of the approved EMPr.</p>
<p>Potential negative impact on noise levels resulting from site preparation, ground excavation and materials handling activities.</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The proposed amendment to the environmental authorisation and EMPr will not change the future noise levels in the area and the area would keep the existing noise character. If anything, the amendment to the mining schedule will, in all likelihood, reduce the extent of future noise levels, due to underground mining.</p>
<ul style="list-style-type: none"> <li>▪ Potential negative impact on pit water quality due to the additional acid-generating discard that will be placed on top of the pit, and subsequent decant of mine affected water once mining and operational dewatering</li> </ul>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>The impact on the water resources of the existing operations have been quantified and is monitored on a regular basis in accordance with existing approvals and authorisations.</p>


COMMENT	STAKEHOLDER	RESPONSE
<p>ceases and the pit fill up, impacting on downstream water resources.</p> <ul style="list-style-type: none"> <li>▪ Potential negative impact on the quality of downstream water resources resulting from spillage of contaminated storm water runoff emanating from the discard facility.</li> <li>▪ Potential negative impact on pit water quality and acceptability for treatment at our wetlands.</li> <li>▪ Potential impact on volume of contaminated mine affected water requiring management/treatment.</li> <li>▪ Potential negative impact on downstream aquatic ecosystems resulting from the above-mentioned impacts on water quality.</li> <li>▪ Potential negative impact on the current wetland offset strategy for the site.</li> <li>▪ Potential negative impact on water supply of local water users.</li> </ul>		<p>The EIA indicated that the proposed changes to the mining schedule and methodology will have a limited impact on the water resources in the area, provided that the mitigation measures in the EMPr are implemented.</p>
<p>Potential positive impact on employment safety of permanent employees, continued skills transfer, and local economic development.</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>Noted. The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.</p> <p>Mining activities and associated employment benefits and SLP contribution will continue regardless of whether this amendment is approved or not.</p>
<p>The potential issues identified in the report are exactly issues that the community is already experiencing due to the current operations. Similar impacts were identified during the initial environmental studies for the facility and the same mitigation measures were identified and recommended. When the mine started to operate there has been serious negative impacts as a result of dust, water contamination, blasting and as the</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>GGV has an approved EMPr under which it operates and all environmental impacts associated with the existing operations are managed in accordance with the approved EMPr. The EMPr is audited on an annual basis by an external party. If any non-compliances are noted, an action plan is compiled for rectification.</p> <p>In addition, detailed environmental monitoring is conducted, including dust, water, blasting, etc. The data is evaluated against acceptable standards.</p>



COMMENT	STAKEHOLDER	RESPONSE
community we are the recipient of the environmental impacts leading to the environmental degradation of our community.		As stated above, any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.
We would like to raise specific issues on environmental impact:	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	The specific issues on environmental impact are noted and responded to below. However, it is emphasized that according to the EIA the amendment of the environmental authorisation and EMPr, should it be granted, will in all likelihood not result in additional environmental impacts. In fact, it may result in the reduction of existing environmental impacts associated with the existing operations. Any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.
<ul style="list-style-type: none"> <li>▪ Blasting: Blasting is done randomly, and we do not have a platform to participate views on timing for blasting. We acknowledge Glencore also sits on stakeholder forums where it is stated that there are several homeowners whose houses were damaged by blasting and so far nothing was done by either of the mining houses. If a Glencore stands for ethical business and morally sound decision, they would have raised concerns over no compliance but nothing was done.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>Ground vibration and air blast monitoring is conducted for all blasts near sensitive receptors to ensure that the acceptable limits are being achieved and to provide an indication of when modification is needed to the blasting method to cater for increased ground vibration and air blast levels.</p> <p>GGV's internal procedure only allows blasting during the day. Notifications are sent to all sensitive receptors residing within 500m from the blast, as per the requirements of the EMPr.</p> <p>No recent complaints have been received in respect of blasting. As stated above, any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.</p>
<ul style="list-style-type: none"> <li>▪ We cannot forget the issues raised by (Siyabonga one for the unemployed) the issue of graveyard which is not even entertained any, where Indian and black African families have never been compensated.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	Most of the gravesites within the GGV area have been exhumed and relocated as mining operations extended. Some gravesites remain, most notably three sites in proximity to the Mosque. Only underground mining is scheduled in this area and these gravesites therefore do not have to be relocated. A Cultural Heritage Management Plan (CHMP) was developed for GGV, which will be implemented to prevent any impacts on the remaining gravesites.
<ul style="list-style-type: none"> <li>▪ We need a detailed dust management plan so we can contribute our views.</li> </ul>	Francisco Vilanculo	GGV Complex has an established dust fall-out monitoring network. The monitoring programme is re-evaluated on a regular basis as mining and

COMMENT	STAKEHOLDER	RESPONSE
	Siyabonga one for the unemployed 20 June 2022	<p>infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report.</p> <p>Several dust mitigation measures are in place, most notably dust suppression along unpaved roads and chemical stabilization of major haul roads.</p> <p>The key findings from the Environmental Impact Assessment (EIA) indicate that there will be limited new impacts due to the amendment application, rather a continuation of existing impacts on the socio-economic and physical environment.</p>
<ul style="list-style-type: none"> <li>▪ Water Shortages: It is well known water is a scarce resource in the area and whenever Glencore does its application, it is noted there are water challenges for residents and Glencore still believe they can increase their water consumption without providing details of community support on scarce water resources. An alternative water supply for the community must be provided and accepted by the community.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>The community water supply is not affected by the GGV operations, and no additional water consumption is required for the proposed amendment activities.</p> <p>Water supply to the communities is the responsibility of the Local Municipality. However, to address water shortage around the Phola/Ogies communities, GGV supported water provision under its 2018-2022 SLP.</p>
<ul style="list-style-type: none"> <li>▪ Water Pollution: Glencore operate close to Klippoortjespruit stream that is highly contaminated and invaded by alien species and still the company believed possible water impact as a results of internal water management which may cause cumulative impacts. As a results water must be tested and community must be made aware of the contamination level.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>Surface water monitoring is conducted monthly in terms of the existing authorisations and licences granted in respect of the GGV operations. The results of the surface water monitoring are reported to the Authorities annually.</p> <p>The photos included in the submission from Siyabonga one for the unemployed are not related to the GGV site.</p>
<ul style="list-style-type: none"> <li>▪ Waste Management: Management of mining waste is done accordingly at current facility however the mine does not participate in ensuring the surrounding is free of litter.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>Although waste management in the communities is the responsibility of the Local Municipality, Glencore does support initiatives/requests such as clean up campaigns in the surrounding communities. A recent example is the sponsorship of the clean-up campaign by Tshikovha Graduates Academy under the Leader's Eye concept. Glencore</p>

COMMENT	STAKEHOLDER	RESPONSE
		sponsored wheelie bins, refuse bags, trees, compost, fertilizers and cement for the project.
<ul style="list-style-type: none"> <li>Biodiversity: Continuous removal of plants and displacing natural habitats for animals will leave without grazing land and People without biodiversity. Biodiversity is the food we eat, the water we drink, and it is also the air we breathe. More than that, biodiversity is part of us, as we humans are part of nature.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	The proposed changes associated with this amendment application will not have an increased impact on the biodiversity as all activities will be undertaken within the open pit areas that was approved previously.
<ul style="list-style-type: none"> <li>Why should anyone care about the loss of nature? Why should the country take drastic steps, to halt the decline in biodiversity? South Africa's economy is still very reliant on mining resources. While many livelihoods depend on this sector, for many communities living close to mines, it means facing the adverse health impacts that stem from a heavily degraded environment.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.</p> <p>Detail environmental monitoring is conducted, including dust, water, blasting, etc. The data is evaluated against acceptable standards and legislative limits.</p>
<ul style="list-style-type: none"> <li>We do not want our Biodiversity to be damaged furthermore. We need a detailed plan for rehabilitation of the damaged areas with proper vegetation.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	GGV has a rehabilitation plan which is reviewed on a regular basis as mining progresses. Glencore does not only focus on the number of hectares rehabilitated but also quality. Rehabilitated areas are assessed externally on an annual basis and recommendations are implemented continuously.
<ul style="list-style-type: none"> <li>Health and Safety: health and safety of our people have been ignored for several years and when we raise health concerns no one responds. We have evidence of people whose eyes are damaged from dust and those whose health has been affected by inhaling dust from the mine.</li> </ul>	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	<p>The comment is noted. However, no evidence has been presented to GGV indicating that the health impacts described is attributed to GGV's operations.</p> <p>As indicated above, GGV Complex has an established dust fall-out monitoring network. The monitoring programme is re-evaluated on a regular basis as mining and infrastructure development progresses. Dust fall-out are recorded monthly, with an annual monitoring report.</p>
CSI Since the start of Goedgevonden operation, there has never been a specialized Corporate Social Investment especially for the host community. Last year community hosted clean-up campaign for	Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022	There is a CSI budget allocation yearly. This fund supports initiatives which benefits the larger community and not an individual, political organizations, churches, business etc. Proposals from a registered entity are submitted to the Community Department and reviewed by the CSI committee. Over the years GGV has supported several environmental

COMMENT	STAKEHOLDER	RESPONSE
<p>waste and there was not even one contribution from Goedgevonden. People that work in those programmes do not even engage with communities or just make a strategic visit. We want to have clear commitment for Goedgevonden on CSI for the area in the next 2 years.</p> <p>Each mining application goes with Social Labour Plan. We would like to access the SLP without paying so we can hold Goedgevonden accountable for the implementation of programmes. (Profit Sharing): Subject for later discussion.</p>		<p>initiatives, including a cleanup campaign in partnership with the Phola/Ogies Municipality by donating skip bins, cleaning tools, PPE &amp; trees.</p>  <p>CSI update reports are also provided in our quarterly Community Consultative Forum.</p> <p>Should the community require access to the SLP, it is advised to request access to records in terms of the Promotion of Access to Information Act 2 of 2000 from the DMRE, or Glencore's public information officer.</p>
<p>On the bases of the above, we are hereby objecting Environmental Approval and approval for Water use licence for the application as the commitments made before were neglected and now we cannot trust the mine in the projects activities they are proposing. The mine must come clear with plans for local investment and support and participate in environmental programmes using local NPOs, small companies and cooperatives. A long-term rehabilitation plan for the mine should be provided to locals and local empowerment strategy on greening, waste management and recreational parks must be used for social investment.</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 20 June 2022</p>	<p>It is noted that this application is not for the renewal of the mining right or any of the authorisations or licences held by GGV. GGV Complex is an existing operational mine.</p> <p>The GGV operation is an important economic driver within the local area, and contributes to the economic growth, employment and indirect and induced economic benefits of not just the local area, but within the Mpumalanga Province.</p> <p>Refer to the responses above on specific items such as local investment and empowerment, rehabilitation and waste management.</p>


COMMENT	STAKEHOLDER	RESPONSE
<ul style="list-style-type: none"> <li>▪ A follow up meeting with DMRE on request must be made due to non-compliance.</li> <li>▪ Mine officials on High position with arrogance, careless official, selfish official.</li> <li>▪ Sitting on their offices with programs that should benefit the community which link with DMRE sign off.</li> <li>▪ Upcoming CCF should also be raised without fear on the 24 June 2022.</li> </ul>	<p>Given Yika 20 June 2022 Email in response to comments by Francisco Vilanculo Siyabonga one for the unemployed</p>	<p>Noted.</p>
<p>We have gone through the document which was afforded to us as community stakeholder date 24/08/2022 with understanding that it serves as a primary engagement and information sharing of which we appreciate it</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022</p>	<p>Noted.</p>
<p>We therefore which to put in record that an open door policy should be an anchor for our discussions which will yield good results to all parties concerned and we propose an objectivity in all aspects which will be having cordial operation relations as we are the beneficiary custodian (communities in a mining zones)</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022</p>	<p>Noted.</p>
<p>Our primary submission to this primary level informed by this amendment codocument proposed by your goodselves with date mentioned above as follows</p> <ul style="list-style-type: none"> <li>▪ We are of the view that you have made your informed decision through a research which might be a qualitative research to detect your information at hand which is good and give guarantees to your intentions for progressive mining operations.</li> </ul>	<p>Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022</p>	<p>Noted.</p>
<p>Our humble submission on this one is make request community participation desk to afford us a research which might apply a quatitative research through us as a community stakeholders to satisfy our point of departure inline with the</p>	<p>Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022</p>	<p>Noted.</p>

COMMENT	STAKEHOLDER	RESPONSE
findings listed in your document which will cultivate an equal footing to these new developments and sundry.		
We will give more of our position after we were afforded a presentation which cattail the operation framework with us the community representation with further engagement should there be a need in future informed by the above open policy working relation.	Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022	Noted.
NB all the enlisted findings will find expressions after we have been furnished with all the duely requested research information which will coupled with the one at hand.	Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022	Noted.
We could be very appreciating in case we could be responded in time atleast 7 (seven)working days from 06/09/2022.	Francisco Vilanculo Siyabonga one for the unemployed 5 Sept 2022	Noted.

## 2.4 FARM COMMUNITY STAKEHOLDERS

COMMENT	STAKEHOLDER	RESPONSE
Changing the road affects farm community and others using this R545, R547 and R555. I attach the full comment about the proposal. On that attachment I explain how community will be affected.	Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022	Road diversion will not have a negative impact on the Mafufela community (Zaaiwater area) as the diversion is a distance away from them and there will be no changes to the access to Ogies Town.
Goedgevonden need to empowering local farm community. They must involve farm community to business they are doing. They must assist this farming community to open their business in order to support their family. Business opportunity is what we want to see happening.	Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022	Glencore provides community business opportunity through the Glencore Enterprise & Supply Development programme. The community can register and apply through our ESD portal and can get physical assistance at Glencore business Hub in Ogies.

COMMENT	STAKEHOLDER	RESPONSE
<p>Thank you for the opportunity given to us to comment on the new road proposal. At first let me start by saying the following:</p> <ul style="list-style-type: none"> <li>▪ Glencore Operations SA (Pty) Ltd: Goedgevonden Complex, is not the first time they propose road change, they did this when the mine start operation, what they did which even today we are not happy about it.</li> <li>▪ They build railway line going to the mine silo, the railway line pass to the gravel road that was using by people reach R545 road which go to Ogies and Bethal.</li> <li>▪ They build road that joins R545 going to Leandra, forget about people who was using gravel road to join R545.</li> <li>▪ The family who was using the gravel road must change to new road that they build, that join R545, but the entry to that family is very very bad and dangerous to the traffic till today that entry is bad, Goedgevonden concentrate on mining forget about community.</li> <li>▪ Goedgevonden don't care about farm community.</li> </ul>	<p>Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022</p>	<p>Noted.</p> <p>The road diversion referred to was approved in 2006 under the Mineral and Petroleum Resources Development Act 28 of 2002 (Ref: OT6/2/2/448) and the Environment Conservation Act (Ref: 17/2/5 NK 58).</p> <p>Any concerns or queries with regard to the existing mining operations should be reported to GGV through the established structures and channels of resolution.</p>
<p>Now they propose to change road again at the expense of poor farm community, who can't even fight for them self, one family (Nhlapho family) is affected by all this changes, they go and bought farm to the farm owners after that forget what this community want.</p>	<p>Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022</p>	<p>The 2016 approved EMPr includes the re-alignment of provincial Road P53-1 which links Road R555 and Road 545 on the south-eastern side of Ogies.</p> <p>Environmental Authorisation for the re-alignment of Road P53-1 was granted by the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA) on 8 September 2015 (Ref No 17/2/3N-273).</p> <p>Thus, approval for the road re-alignment is in place. The current application for an amendment is only a slight revision of the re-alignment of P53-1 that was approved in 2015 with no additional impacts.</p>

COMMENT	STAKEHOLDER	RESPONSE
<p>I want to say this Mine Goedgevonden must come out and solve the problem left behind before they can start proposing to change road again, because now other community will be affected again, even that very same family will also be affected by this proposal.</p>	<p>Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022</p>	<p>The total length of the proposed (revised) re-alignment is 1.25 km vs original alignment length of 1.28 km (2015). This is a deviation of less than 5% on the total road alignment. No additional impact is thus anticipated.</p>
<p>Goedgevonden must know that everything they do affect the farm community, affect their livestock, affect their living (e.g. they used to get water from the farm and borehole) but now borehole is no more operating, because of the mining activities, they used to plant vegetables but now they can't of which no assistance from the mine, it must come to an end.</p>	<p>Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022</p>	<p>The mine has donated Jo-Jo tanks to the families in the past years and the municipality fills the tanks as their responsibility. The mine engages the community and forms part of the stakeholder engagement platform. When there are requests for assistance from the community, these are considered under the Corporate Social Investment (CSI) strategy. Recently the mine graded the access road to the family.</p> 
<p>Take note: we use our land to have livestock, plant vegetables and other fruits to support our families changing of road it affects us, specials on selling our products.</p>	<p>Thembimkosi Silanela Sgesgede Farm Chairman 17 June 2022</p>	<p>The revision of the road re-alignment will have a minimum impact as indicated above. Access to Ogies Town remains unchanged.</p>