



mineral resources & energy

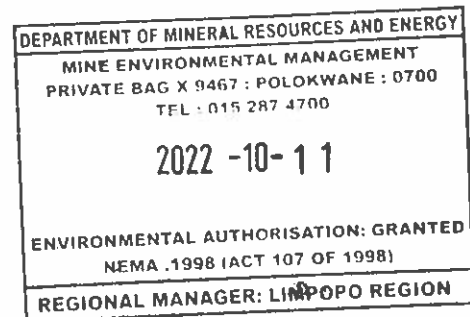
Department:
Minerals Resources and Energy
REPUBLIC OF SOUTH AFRICA

Private Bag X 9467, Polokwane, 0700, Tel: 015 287 4700, Fax: 086 710 1045
DMR Building, 101 Dorp Street, Polokwane, 0699

Enquiries: Ms. Mudau M.D. Ref: LP30/5/1/2/3/2/1 (061 & 063) EM
E-Mail Address: Daisy.Mudau@dmre.gov.za
Sub-Directorate: Mine Environmental Management

BY HAND

The Director(s):
Marula Platinum (Pty) Ltd
P.O. Box 1496
Steelpoort
1133



For attention: Mr. Sifiso Mthethwa
CC: Ms. Mavisha Nariansamy

Email: Sifiso.Mthethwa@implats.co.za
Email: mnariansamy@slrconsulting.com

ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (NEMA) AS AMENDED, AND THE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REGULATIONS, 2014 FOR MARULA PLATINUM (PTY) LTD AND ASSOCIATED INFRASTRUCTURAL ACTIVITIES AT THE EXISTING MINE OPERATIONS FOR CHANGING LAYOUT BY ESTABLISHING ADDITIONAL SURFACE INFRASTRUCTURE ON THE FARMS DRIEKOP 253 KT, WINNARSHOEK 250 KT AND CLAPHAM 118 KT SITUATED WITHIN FETAKGOMO-TUBATSE LOCAL MUNICIPALITY OF SEKHUKHUNE DISTRICT, LIMPOPO REGION.

With reference to the abovementioned application, please be advised that the Department has decided to **grant** environmental authorisation in terms of National Environmental Management Act (Act 107 of 1998). The environmental authorisation and reasons for the decision are attached herewith.

In terms of regulation 4 (2) of the Environmental Impact Assessment Regulations of 2014, you are instructed to notify all registered interested and affected parties, in writing within 14 (Fourteen) calendar days, from the date of the Department's decision in respect of your application and the relevant provisions regarding the lodgement of appeal must be provided for in terms of the National Appeal Regulations of 2014.

Should you wish to appeal any aspect of the decision, you must submit the appeal to the Minister of Environmental Affairs and a copy of such appeal to the Department of Mineral Resources (Limpopo Regional Office), within 20 days from the date of notification, and such appeal must be lodged as prescribed in by Chapter 2 of the National Appeal Regulations of 2014, by means of the methods as per prescribed below:

Appeal to the Department of Environmental Affairs

Attention : Directorate Appeals and Legal Review
Email : appealsdirector@environment.gov.za
By post : Private Bag X 447, **PRETORIA**, 0001
By hand : Environmental House, Corner Steve Biko and Soutpansberg Street, Arcadia, **Pretoria**, 0083

Copy of the lodged appeal to the Department of Mineral Resources

Attention : Regional Manager: Limpopo Region
By facsimile : (015) 297 7230
E-mail : Thivhulawi.kolani@dmre.gov.za
By post : Private Bag X 9467, **POLOKWANE**, 0700
By hand : DMR Building, 101 Dorp Street, **Polokwane**, 0699

Should you decide to appeal, you must comply with the National Appeal Regulation of 2014 in relation to notification of all registered interested and affected, and a copy of the official appeal form can be obtained from the Department of Environmental Affairs.

Kind Regards,

M. Modilati Malapane
MS. MODILATI MAGDELINE MALAPANE
CHIEF DIRECTOR: NORTHER REGIONS
MINERAL AND PETROLEUM REGULATION
DATE: *11.10.2022*

DEPARTMENT OF MINERAL RESOURCES AND ENERGY MINE ENVIRONMENTAL MANAGEMENT PRIVATE BAG X 9467 : POLOKWANE : 0700 TEL : 015 287 4700
2022 -10- 11
ENVIRONMENTAL AUTHORISATION: GRANTED NEMA, 1998 (ACT 107 OF 1998)
REGIONAL MANAGER: LIMPOPO REGION



mineral resources & energy

Department:
Minerals Resources and Energy
REPUBLIC OF SOUTH AFRICA

Private Bag X 9467, Polokwane, 0700, Tel: 015 287 4700, Fax: 086 710 1045
DMR Building, 101 Dorp Street, Polokwane, 0699

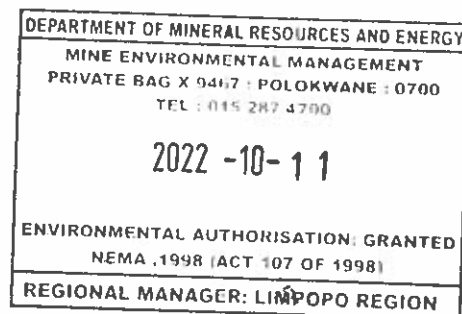
ENVIRONMENTAL AUTHORISATION

Reference number: LP30/5/1/2/3/2/1 (061 & 063) EM

Last amended: First issue

Holder of authorisation: Marula Platinum (Pty) Ltd

Location of activities: Farms Driekop 253 KT, Winnarshoek 250 KT, and Clapham 118 KT, situated within Fetakgomo-Tubatse Local Municipality of Sekhukhune District: Limpopo Region.



DECISION

ACRONYMS

NEMA:	The National Environmental Management Act, 1998 (Act 107 of 1998), as amended
EIA:	Environmental Impact Assessment.
DEPARTMENT:	Department of Mineral Resources.
EA:	Environmental Authorisation.
IEA	Integrated Environmental Authorisation.
EMPr:	Environmental Management Programme
BAR:	Basic Assessment Report
S&EIR:	Scoping and Environmental Impact Report
I&AP:	Interested and Affected Parties
ECO:	Environmental Control Officer
LIHRA:	Limpopo Heritage Resource Agency
SAHRA:	South African Heritage Resources Agency
EIA REGULATIONS:	EIA Regulations, 2014
MPRDA:	Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), as amended
NEMA:WA:	National Environmental Management: Waste Act, 2008 (Act 59 of 2008), as amended.

The Department is satisfied, on the basis of information availed to it and subject to compliance with the conditions of this environmental authorisation, that the applicant should be authorised to undertake **NEMA EIA** listed activity (ies) specified below. Details regarding the basis on which the Department reached this granting decision are set out in **Annexure "1 and 2"** of this integrated environmental authorisation.

ACTIVITY APPLIED FOR

By virtue of the powers conferred on it by NEMA, the Department hereby Grant an application for EA by **Marula Platinum (Pty) Ltd** with the following contact details –

Mr. Sifiso Mthethwa
Marula Platinum (Pty) Ltd
 P.O. Box 1996
Steelpoort
 1133

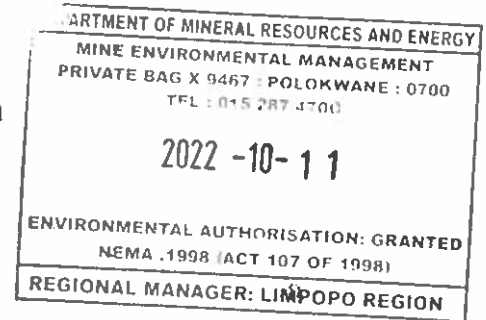
Tel no: (013) 214 6040

Email: Sifiso.Mthethwa@implats.co.za

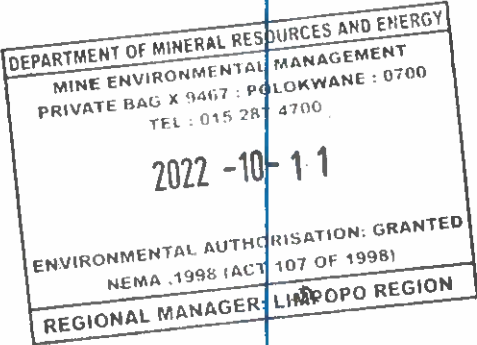
to undertake the following activities listed in the NEMA EIA Regulation.

NEMA: LISTED ACTIVITIES:

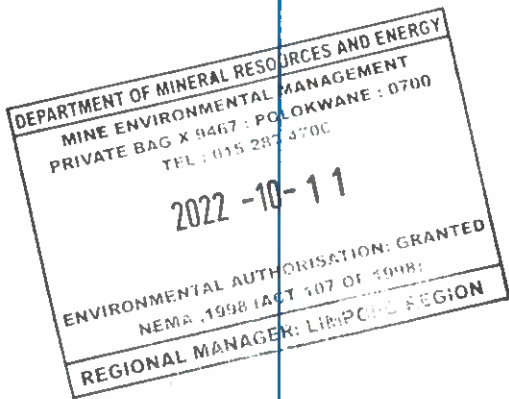
Listed in the EIA Regulations R. 983 of 2014 as:-



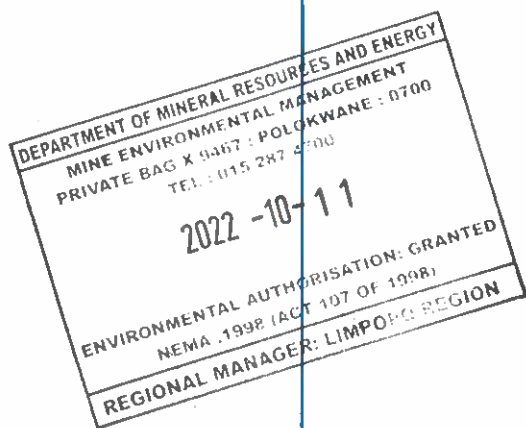
Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
Ventilation shafts		
Establishment of the Driekop VS 9	No extension beyond current approved footprint of Driekop Shaft 6.	NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment. Relevance: <i>The proposed upgrades to the ventilation and refrigeration infrastructure will require an application in terms of section 102 of the MPRDA.</i>
Establishment of the Clapham VS 8 and a bulk air cooler, and refrigeration plant and condensing cooling towers	An approximate application area of 0.5 Ha.	
Driekop VS 6 - Establishment of a new bulk air cooler, refrigeration plant and condensing cooling towers	Within the existing, approved footprint of the Driekop VS 6 shaft area.	
Clapham VS 5 – Establishment of new bulk air cooler	Within the existing, approved footprint of the Clapham VS 5 shaft area.	
Clapham VS 7 (Approved not yet constructed) - Establishment of surface	An approximate application area of 1.8 Ha.	
		NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in

Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
<p>main fans and electrical rooms.</p> 		<p>terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The changes to the approved ventilation and refrigeration infrastructure at Clapham Shaft 7 will require an application in terms of Section 102 of the MPRDA.</i></p> <p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 27: The clearance of an area of 1 ha or more, but less than 20 ha of indigenous vegetation, except where such clearance of indigenous vegetation is required for - (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>Relevance: <i>The establishment of the proposed ventilation shafts will require the removal of more than 1 ha of indigenous vegetation.</i></p>
Power supply and transmission		
<p>Upgrade the capacity of existing Eskom substation to 54 MVA</p>	<p>Additional 40 MVA. Within the existing Eskom Yard footprint.</p>	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p> <p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The expansion of the power supply and transmission will require an application in terms of Section 102 of the MPRDA.</i></p>
<p>Establishment of 33 kV Overhead Transmission Line (OHT) to Driekop Ventilation Shaft 9</p>	<p>3.3 km</p>	<p>NEMA (GNR 983 of 2014), as amended: Listing Notice 1, Activity 48</p> <p>The expansion of - (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or where such expansion occurs - (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>Relevance: <i>The establishment of the Clapham and Driekop water supply infrastructure will cross a non-perennial watercourse.</i></p> <p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p>

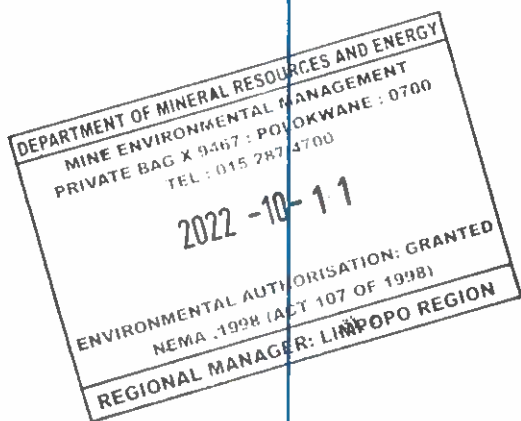
Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
		<p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The expansion of the power supply and transmission will require an application in terms of Section 102 of the MPRDA.</i></p>
<p>Establishment of 33 kV Overhead Transmission Line (OHT) to Clapham Ventilation Shaft 8</p>	<p>3.8 km</p>	<p>NEMA (GNR 983 of 2014), as amended: Listing Notice 1, Activity 48</p> <p>The expansion of - (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or where such expansion occurs - (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>Relevance: <i>The establishment of the Clapham and Driekop water supply infrastructure will cross a non-perennial watercourse.</i></p> <p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p> <p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The expansion of the power supply and transmission infrastructure will require an application in terms of Section 102 of the MPRDA.</i></p>
Water supply and distribution		
<p>Establishment of a proposed Clapham water supply pipeline</p>	<p>Area of disturbance = 13 000 m² / 1.3 Ha</p>	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p> <p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The upgrade of water supply and distribution will require an application in terms of Section 102 of the MPRDA.</i></p>



Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
		<p>NEMA (GNR 983 of 2014), as amended: Listing Notice 1, Activity 48: The expansion of -</p> <p>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or where such expansion occurs -</p> <p>(a) within a watercourse;</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>Relevance: <i>The establishment of the Clapham and Driekop water supply infrastructure will cross watercourses.</i></p>
<p>Establishment of the proposed Driekop water supply pipeline</p>	<p>Area of disturbance = 5 250 m²/ 0.525 Ha.</p>	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p> <p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The upgrade of water supply and distribution will require an application in terms of Section 102 of the MPRDA.</i></p> <p>NEMA (GNR 983 of 2014), as amended: Listing Notice 1, Activity 48: The expansion of -</p> <p>(i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or where such expansion occurs -</p> <p>(a) within a watercourse;</p> <p>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.</p> <p>Relevance: <i>The establishment of the Clapham and Driekop water supply infrastructure will cross watercourses.</i></p>
Establishment of a product stockpile		
<p>Establishment of an additional product stockpile</p>	<p>Within the existing footprint of the Concentrator Plant</p>	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D</p> <p>Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The establishment of an additional product stockpile will require an application in terms of Section 102 of the MPRDA.</i></p>



Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
Additional pipeline to the approved TSF		
Establishment of an additional TSF pipeline	Length = 4 km No additional disturbance is expected.	<p>NEMA (GNR 983 of 2014), as amended: Listing Notice 1, Activity 10: The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes – (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more; excluding where - (a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or (b) where such development will occur within an urban area.</p> <p>Relevance: <i>The establishment of an additional pipeline to the Phase 2 TSF.</i></p> <p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The additional pipeline to the approved TSF will require an application in terms of Section 102 of the MPRDA.</i></p>
Upgrade to existing change house (including lamp room) and compressed airline		
Upgrades to the Clapham change house	440 m ² within the approved footprint of the Clapham Shaft Complex.	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The additional pipeline to the approved TSF will require an application in terms of Section 102 of the MPRDA.</i></p>
Upgrades to the compressed air pipeline at the Clapham Shaft Complex.	Not applicable. Within the already approved footprint of the Clapham Shaft Complex.	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: <i>The additional pipeline to the approved TSF will require an application in terms of Section 102 of the MPRDA.</i></p>
TSF contamination plume rehabilitation		
Amendment of the EMPr to include remediation measures	Not applicable.	<p>NEMA GNR 983 of 2014 (as amended): Listing Notice 1, Activity 21 D Any activity including the operation of that activity which requires an amendment or variation to a right or permit in</p>



Name of Activity	Aerial Extent of the Activity (Ha or m ²)	Applicable Listing Notice
		<p>terms of Section 102 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity contained in this Listing Notice or in Listing Notice 3 of 2014 (as amended) required for such amendment.</p> <p>Relevance: The additional pipeline to the approved TSF will require an application in terms of Section 102 of the MPRDA.</p>

COORDINATES OF THE PROPOSED ACTIVITIES.

Ventilation Shafts			
Name	Authorisation Status	South	East
Clapham Upcast V 7	Approved.	S24° 30' 38.958"	E30° 3' 31.118"
Clapham VS 5	Approved – Requires the establishment of new bulk air cooler	S24° 30' 38.53"	E30° 3' 37.79"
Driekop VS 6	Approved – Requires the establishment of a new bulk air cooler, refrigeration plant and condensing cooling towers.	S24° 31' 44.85"	E30° 4' 41.13"
Clapham Downcast V 8	Proposed.	S24° 30' 39.173"	E30° 3' 29.643"
Driekop Upcast V 9	Proposed	S24° 31' 47.606"	E30° 4' 40.198"

DEPARTMENT OF MINERAL RESOURCES AND ENERGY
MINE ENVIRONMENTAL MANAGEMENT
PRIVATE BAG X 9467 : POLOKwane : 0700
TEL : 015 287 4700

2022 -10- 11

ENVIRONMENTAL AUTHORISATION: GRANTED
218951998 (ACT 107 OF 1998)
REGIONAL MANAGER: LIMPOPO REGION

TSF Pipeline			
Name	South	East	
Start	S24° 30' 3.762"	E30° 4' 21.895"	
Middle	S24° 30' 30.734"	E30° 5' 14.066"	
End	S24° 30' 32.641"	E30° 6' 12.020"	

Clapham Water Supply Pipeline			
Name	South	East	
Start	S24° 30' 14.93"	E 30° 4' 11.70"	
Middle	S24° 30' 35.41"	E 30° 4' 1.81"	
End	S24° 30' 38.958"	E30° 3' 31.118"	

Driekop Water Supply Pipeline		
Name	South	East
Start	S 24° 30' 14.71"	E 30° 4' 12.09"
Middle	S24° 30' 52.07"	E30° 4' 53.05"
End	S24° 31' 47.606"	E30° 4' 40.198"

33 KV Overhead Transmission Line To Clapham Ventilation Shaft 8 (Follows Existing Servitude)		
Name	South	East
Start	S24° 29' 51.04"	E30° 4' 14.68"
Middle	S24° 29' 40.94"	E30° 3' 30.83"
End	S24° 30' 39.173"	E30° 3' 29.643"

33 KV Overhead Transmission Line To Driekop Ventilation Shaft 9		
Name	South	East
Start	S24° 30' 40.01"	E30° 5' 1.69"
Middle	S24° 31' 11.03"	E30° 5' 13.56"
End	S24° 31' 47.606"	E30° 4' 40.198"

DEPARTMENT OF MINERAL RESOURCES AND ENERGY
MINE ENVIRONMENTAL MANAGEMENT
PRIVATE BAG X 9487 : POLOKWANE : 0700
TFL : 015 287 4700
2022 - 10 - 11
ENVIRONMENTAL AUTHORISATION: GRANTED
NEMA, 1998 (ACT 107 OF 1998)
REGIONAL MANAGER: LIMPOPO REGION

Upgrade The Capacity Of Existing Eskom Substation To 54 MVA		
Name	South	East
Centre Point	S24° 29' 51.04"	E30° 4' 14.68"

Establishment Of An Additional Product Stockpile Within The Existing Footprint Of The Concentrator Plant		
Name	South	East
Centre Point	S24° 29' 57.38"	E30° 4' 12.91"

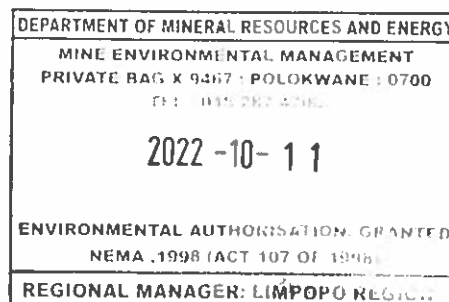
The granting of this EA is subject to the conditions set out below (site specific) and in **Annexure 2** (Departmental standard conditions). The **BAR and EMPR** attached as part of reports for the above development submitted as part of the application for an EA is hereby approved and must be adhered to throughout the life cycle of the operation.

MARULA PLATINUM (PTY) LTD IS PROPOSING TO CHANGE THEIR LAYOUT BY ESTABLISHING ADDITIONAL SURFACE INFRASTRUCTURE WHICH WILL REQUIRE AN AMENDMENT TO THEIR APPROVED EMPR. THE PROPOSED ADDITIONAL SURFACE INFRASTRUCTURE COMPRISES THE FOLLOWING:

- The establishment of two additional ventilation shaft.
- The upgrade to refrigeration and ventilation infrastructure at existing ventilation shafts.
- The establishment of additional water pipelines to support the additional ventilation shafts.
- The expansion and establishment of additional power supply and distribution infrastructure in support of the establishment of additional ventilation shaft and upgrades to existing ventilation shaft.
- The establishment of a product stockpile within the existing footprint of the Concentrator Plant.
- The establishment of an additional pipeline to the approved Tailing Storage Facility (TSF).
- Structural upgrades of the existing change house and compressed airline at the Clapham Shaft Complex.
- Implementation of monitoring and remediation measures to assist with the management of the UG Tailings pollution plume.

IEA SITE SPECIFIC CONDITIONS

1. Protected plant species must not be removed (disturbed, cut and destroy their products which may not be possessed, collected, removed, transported, exported, donated, purchased or sold) unless the necessary permission is granted by the Department of Agriculture, Forestry and Fisheries (DAFF);
2. All development footprint areas and areas affected by the proposed development must remain as small as possible and must not encroach onto the surrounding sensitive areas and the associated buffer zones;
3. Wetland and riverine areas are to be considered as no go zones unless authorisation is obtained. Ensure that construction activities are outside the demarcated wetland area. No activity should be allowed to encroach on to wetland system;
4. Rehabilitation of the environment affected by any activities undertaken must be done as committed on the approved EIR and EMPR;
5. Should any archaeological or historical artefacts be identified during the mining operation, the area should be demarcated and a heritage specialist be contacted immediately;
6. All vehicles should be maintained to ensure that no contamination of soils/ surface water takes place;
7. The groundwater management systems should be maintained throughout the LoM;



ANNEXURE 1: REASONS FOR THE DECISION

1. Background

Marula Platinum (Pty) Ltd submitted an application for EA for activities listed in the EIA Regulations of 2014 as:

2. Information considered in making the decision

In reaching its decision, the Department took, *inter alia*, the following into consideration -

- a) The information contained in the application form/ Report received by the Department on 24 November 2021;
- b) The proposed amendments trigger new Listed Activities in terms of GNR 983 of December 2014 (as amended).
- c) A bank guarantee to the amount of **R11 436 364.43 Eleven Million, Four Hundred Thirty Six Thousand, Three Hundred Sixty Four Rand and Forty Three cents**) submitted as financial provision as required in terms of section 24P of NEMA.

3. Key factors considered in making the decision

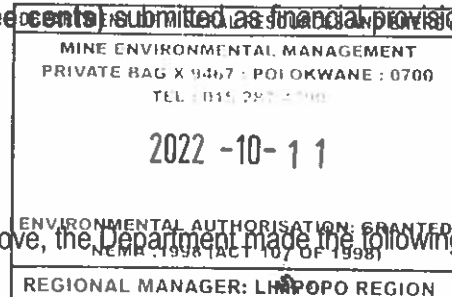
All the information presented to the Department was taken into account upon the Department's consideration of the application. A summary of the issues which, in the Department's view, were of the most significance are set out below.

- a) A sufficient Public Participation Process (PPP) was undertaken and the applicant has satisfied the minimum requirements as prescribed in the EIA Regulations, 2014 (R982 of 2014) for public involvement;
- b) The environmental impacts associated with the proposed activity will be addressed by the implementation of proposed mitigation measures outlined in the BAR and EMPr compiled by Mavisha Nariansamy of SLR Consulting.
- c) A bank guarantee to the amount of **R11 436 364.43 Eleven Million, Four Hundred Thirty Six Thousand, Three Hundred Sixty Four Rand and Forty Three cents**) submitted as financial provision as required in terms of section 24P of NEMA.

4. Findings

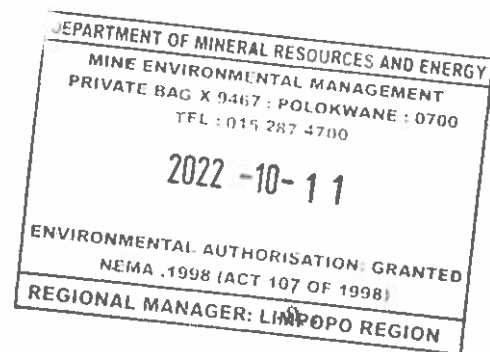
After consideration of the information and factors listed above, the Department made the following findings -

- a) The potential impacts on the proposed site were clearly investigated and mitigation measures outlined.
- b) Public Participation Process complied with Chapter 6 of the EIA Regulations R.982 of 2014. The PPP included, *inter-alia*, the following:



- A newspaper advertisement;
- Notices were placed at the project site;
- Notices were sent to all key stakeholders and the registered interested and affected parties;
- Public and Authorities meetings (attendance register and minutes of the meetings attached);
- Meeting was held virtually (Microsoft Teams) on 27 October 2020;
- Registration on a database for Background Information Documents (BID);

All issues raised by interested and affected parties were adequately addressed and no objection was received to date.



DEPARTMENTAL STANDARD CONDITIONS

1. SCOPE OF AUTHORISATION

- 1.1. The holder of IEA shall be responsible for ensuring compliance with the conditions contained in the IEA. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of IEA.
- 1.2. Any changes to, or deviation from the project description set out in this IEA must be approved in writing by this Department before such changes or deviation may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the IEA to apply for further authorisation in terms of the EIA Regulations.
- 1.3. The activities, which are authorised, may only be carried out at the property (ies) indicated in the IEA and or on the approved EMPr.
- 1.4. Where any of the holder of the IEA contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the IEA must notify the Department as soon as the new details become known to the holder of the IEA.
- 1.5. The IEA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activity (ies).
- 1.6. The holder of IEA must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and animals.

2. APPEAL OF AUTHORISATION

2.1 The holder of IEA must in writing, within 14 (fourteen) ~~calendar days from the date of the decision~~ and in accordance with EIA Regulation 4(2) do the following:

2.2 Notify all registered I&APs of –

- 2.2.1 The outcome of the application;
- 2.2.2. The date of the decision;
- 2.2.3. The date of issue of the decision and;

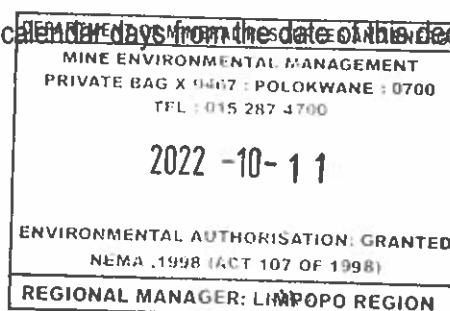
2.2.4 The reasons for the decision as included in Annexure 1 and Departmental Standard Conditions in Annexure 2.

2.3 Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations,

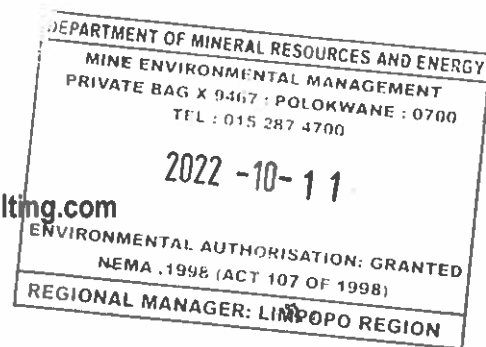
2.4 Draw the attention of all registered I&APs to the manner in which they may access the decision.

2.5 Provide the registered I&APs with:

2.5.1 Name of the holder (entity) of this IEA:
Marula Platinum (Pty) Ltd



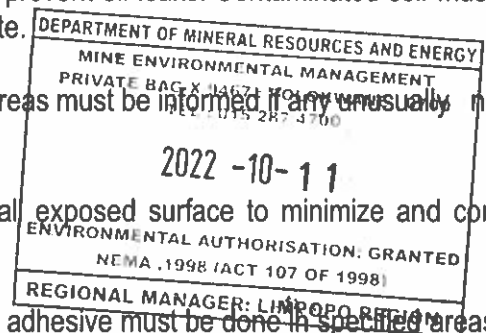
- 2.5.2 Name of the responsible person for this IEA:
Mr. Sifiso Mthethwa
- 2.5.3 Postal address of the holder;
P.O. Box 1496
Steelpoort
1133
- 2.5.4 Telephonic and fax details of the holder:
Tel: (013) 214 6040
Fax (013) 214 6022
- 2.5.5 E-mail address of the holder if any;
Sifiso.Mthethwa@implats.co.za / mnariansamy@slrconsulting.com



3. COMMENCEMENT OF THE ACTIVITY (IES)

- 3.1 In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).
- 3.2 This IEA must be provided to the site operator and the requirements thereof must be made fully known to him or her.
- 3.3 Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Furthermore, movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.
- 3.4 Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.
- 3.5 Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.
- 3.6 Vegetation clearance must be limited areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.
- 3.7 The holder of IEA must note that in terms of the National Forest Act (Act No.84 of 1998) protected plant species, also listed in Limpopo Environmental Management Act (Act no.7 of 2003) must not be cut, disturbed, damaged, destroyed and their products must not be possessed, collected, removed, transported, exported, donated, purchased or sold unless permission is granted by the Department of Agriculture, Forestry and fisheries.
- 3.8 Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.

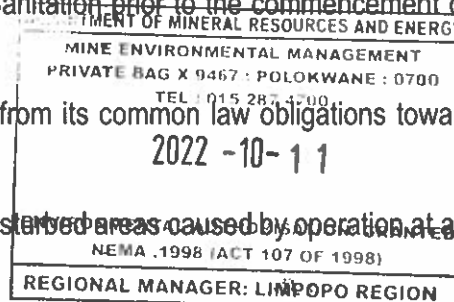
- 3.9 If any soil contamination is noted at any phase of the proposed activity (ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.
- 3.10 An integrated waste management approach must be implemented that is based on waste minimization and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated rubble generated on the premises can be re-used as back filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.
- 3.11 In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the IEA reads through and understand the legislative requirements pertaining to the project. It is the Applicant's responsibility to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.
- 3.12 Construction vehicle must be serviced and maintained in the manner whereby no excessive smokes and noise production is reduced to acceptable levels, and to prevent oil leaks. Contaminated soil must be remediated on site or removed to an authorised landfill site.
- 3.14 Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.
- 3.15 Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust.
- 3.16 Mixing of cement, concrete, paints, solvent, sealants and adhesive must be done in specified areas on concrete aprons or on protected plastic linings to contain spillage or overflow onto soil to avoid contamination of underground water and environmental damage.
- 3.17 Should any heritage remains be exposed during operation or any actions on the site, these must immediately be reported to the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA) (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA).



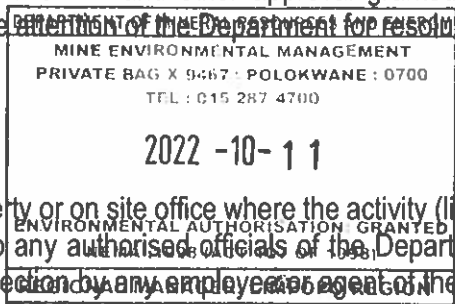
Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; middens, indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.

- 3.18 Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.

- 3.19 Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water resources.
- 3.20 Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.
- 3.21 The holder of IEA must ensure that any water uses listed in terms of Section 21 of National Water Act must get authorization from Department of Water and Sanitation prior to the commencement of such activity (ies).
- 3.22 This IEA does not purport to absolve the holder of IEA from its common law obligations towards the owner of the surface of land affected.
- 3.23 The holder of IEA must ensure that rehabilitation of the disturbed areas caused by operation, at all times comply with the approved EMPr.
- 3.24 This IEA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.
- 3.25 The holder of IEA must note that in terms Section 43A of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), residue deposit and residue deposit must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the Environmental Management Plan or Environmental Management Programme. No person may temporary or permanently deposits residue stockpile or residue deposit on any area or site other than on site indicated on the Environmental Management Plan or Environmental Management Programme.
- 3.26 The holder of IEA must note that in terms Section 20 of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of Section 19 (3) for that activity or a waste management licence is issued in respect of that activity if licence is required.
- 3.27 An appeal under Section 43 (7)of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) suspend an IEA or exemption or any provisions of conditions attached hereto, or any directive unless the Minister directs otherwise.
- 3.28 Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence with the activity (ies) until such time that the Minister allows you to commence with such activity (ies) in writing.
- 3.29 The Department reserves the right to audit and/or inspect the activity (ies) without prior notification at any reasonable time and at such frequency as may be determined by the Regional Manager.



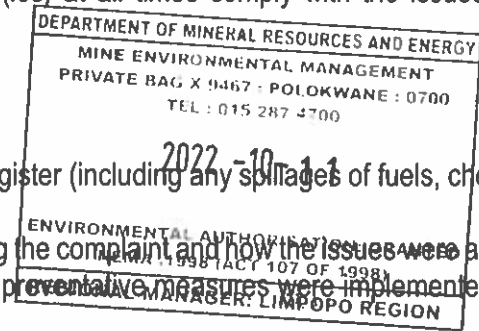
- 3.30 The waste storage site must have a firm, impermeable, chemical resistant floors and a roof to prevent direct sunlight and rain water from getting in contact with the waste.
- 3.31 The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming into contact with the waste and must be diverted away from the storage site.
- 3.32 Subject to the commencement and duration requirements of the MPRDA and NEMA for the listed mining activity is valid for the period for which the aforesaid right is granted provided that this activity must commence within 10 years. If the commencement of the proposed activity does not occur within the specified period, the IEA lapses and a new application for IEA in terms of the NEMA and the EIA Regulations should be made for the activity to be undertaken.
- 3.33 The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.
- 3.34 This IEA will only be effective on the event that a corresponding right is issued in terms of MPRDA as amended and none of the activities listed in this IEA may commence without right.
- 3.35 The listed activity (ies), including site preparation, must not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation is suspended until such time as the appeal is decided.
- 3.36 Should there be any conflicting conditions between this IEA and other approval granted by other authorities, it is upon the holder of IEA to bring it to the attention of the Department for resolution.



4. MANAGEMENT OF ACTIVITY (IES)

- 4.1 A copy of the IEA and EMPr must be kept at the property or on site office where the activity (ies) will be undertaken. The IEA and EMPr must be produced to any authorised officials of the Department who request to see it and must be made available for inspection by any employee or agent of the holder of the IEA who works or undertakes work at the property (ies).
- 4.2 The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.
- 4.3 Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times, if damaged as directed by the Department or any other relevant authority.
- 4.4 A buffer zone of 100 metres between the activity (ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.
- 4.5 The holder of the IEA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.
- 4.6 The holder of the IEA must ensure that all non-recyclable waste are disposed of at waste management facilities licenced to handle such wastes and all recyclable waste are collected by licenced waste management facilities for recycling, reuse or treatment.

- 4.7 The holder of the IEA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.
- 4.8 Non-compliance with any condition of this IEA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31L of NEMA.
- 4.9 This IEA only authorises activities specified in the EMPr /closure plan and a new authorisation must be applied for in respect of any new activity not specified as part of the EMPr
- 4.10 Only listed activities that are expressly specified in the EMPr that forms part of this IEA may be conducted, and additional or new activities not specified herein must be applied for by the holder and authorised by the competent authority in the form of an amendment to the aforesaid EMPr before such activities may be commenced with. This condition is also applicable in the case of the amendment, addition, substitution, correction, removal or updating of any detail in the aforesaid EMPr.
- 4.11 Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.
- 4.12 The Holder of IEA must ensure that the name and contact details of the ECO is made available to the Regional Manager within 30 days of commencement. The holder of IEA must also ensure that an ECO is always available on site to ensure that activity (ies) at all times comply with the issued IEA and approved EMPr.
- 4.13 The ECO must:
- 4.13.1 Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material)
 - 4.13.2. Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re-occurrence of complaints.
 - 4.13.3 Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials.
 - 4.13.4. Keep copies of all environmental reports submitted to the Department.
 - 4.13.5. Keep the records of all permits, licences and authorisations required by the operation.
 - 4.13.6. Compile a monthly monitoring report and make it available to the Department if requested.
- 4.14 The duties and responsibility of the ECO should not be seen as exempting the holder of the IEA from the legal obligations in terms of the NEMWA and NEMA
- 4.15 The footprint of the activity (ies) must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a "no go" areas.
- 4.16 Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.
- 4.17 The holder of the IEA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder IEA.



4.18 In order to prevent nuisance conditions, the holder of the IEA must ensure that all storage skips and bins are not overfilled.

5 REPORTING TO THE DEPARTMENT

5.1 The holder of EA must:

5.1.1 submit and Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner and must the audit report must specify whether conditions of this environmental authorisation and EMPr/closure plan are adhered to;

5.1.2 identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable;

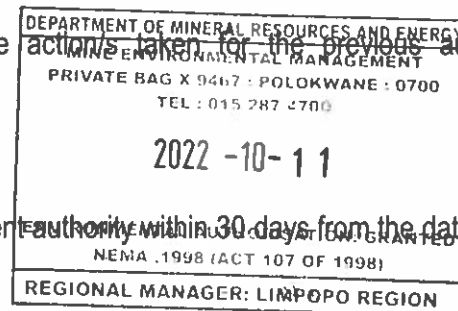
5.1.3 identify shortcomings in the EMPr/closure plan, if applicable;

5.1.4 identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan;

5.1.5 if applicable, specify that the corrective actions taken for the previous audit's non-conformities, was adequate;

5.1.6 Specify the name of the auditor and

5.1.7 Be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.



5.2 Should any shortcomings in terms of Regulation 34(4) be identified, the holder must submit recommendation to amend the EMPr/closure plan in order to rectify any shortcomings identified with the aforementioned audit report.

5.3 Any complaint received from the I&AP during all phases of the operation must be attended to as soon as possible and addressed to the satisfaction of all concerned interested and affected parties.

5.4 The holder of the IEA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address the shortfall on the financial provision submitted in terms of section 24P of NEMA.

5.5 The holder of the IEA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.

5.6 The holder of the IEA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in condition 5.5, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measures taken to –

- 5.6.1 Correct the impact resulting from the incident;
- 5.6.2 Prevent the incident from causing any further impact; and
- 5.6.3 Prevent a recurrence of a similar incident.

5.7 In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate, the Competent Authority may implement the necessary measures at the cost of the holder of the IEA.

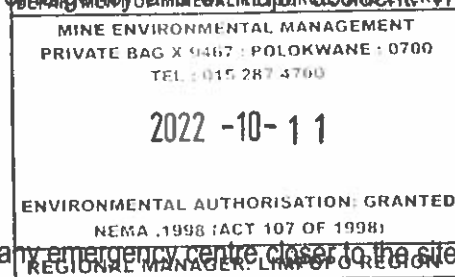
6. SITE SECURITY AND ACCESS CONTROL

- 6.1 The holder of the IEA must ensure effective access control on the site to reasonably prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.
- 6.2 Weather proof, durable and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the Site. These notices must prohibit unauthorised entry and state the hours of operation, the name, address and telephone number of the holder of the IEA and the person responsible for the operation of the site.

7. EMERGENCY PREPAREDNESS PLAN

7.1 The holder of the IEA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and/or major incident. The plan must, amongst others, include:

- 7.1.1 Site Fire
- 7.1.2 Spillage
- 7.1.3 Natural disasters such as floods
- 7.1.4 Industrial action
- 7.1.5 Contact details of police, ambulances and any emergency centre closer to the site



7.2 The holder of IEA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.

8. INVESTIGATIONS

- 8.1 If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the IEA must initiate an investigation into the cause of the problem or suspected problem.
- 8.2 If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the IEA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.
- 8.3 Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority.

8.4 Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the IEA must submit mitigation measures to the satisfaction of the Competent Authority.

9. COMMISSIONING AND DECOMMISSIONING

9.1 The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.

10. SITE CLOSURE

10.1 The holder of IEA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.

10.2 The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended.

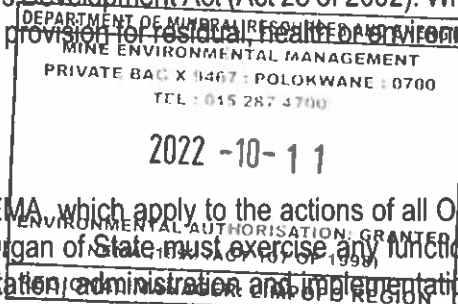
10.3 No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilized for rehabilitation purposes.

10.4 The holder of IEA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of IEA and the management and sustainable closure thereof until the Minister has issued a Closure Certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002). Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.

11. NEMA PRINCIPLES

The NEMA Principles (set out in Section 2 of NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and
- the selection of the best practicable environmental option.



12. DISCLAIMER

The Department of Mineral Resources in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

13. RECOMMENDATIONS

In view of the above, the NEMA principles, compliance with the conditions stipulated in this IEA, and compliance with the EMP/closure plan, the competent authority is satisfied that the proposed listed activity/ies will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of NEMA, and that any potentially detrimental environmental impacts resulting from the listed activity/ies can be mitigated to acceptable levels. **The authorisation is accordingly granted.**

Your interest in the future of our environment is appreciated.

Kind Regards,

M. M. Malapane
MS. MODILATI MAGDELINE MALAPANE
CHIEF DIRECTOR: NORTHER REGIONS
MINERAL AND PETROLEUM REGULATION
DATE: *11.10.2022*

