Stakeholder Database: Kwezi MR Expansion					
Organisation	**Description**	**Property**	**Name**	**Surname**	**Address**
Municipalities					
Bojanala Platinum District Municipality			P	Shikwane	
Bojanala Platinum District Municipality	Environmental Director		Amanda	Bubu	
Bojanala Platinum District Municipality	Acting Municipal Manager and Director of Health and Environmental Services Bojanala District Municipality		Tshepo	Lenake	Cnr Beyers Naude & Fatima Bhayat Dr Rustenburg 0300
Rustenburg Local Municipality	Environmental Officer		Lilian	Sefike	Corner Beyers Naude and Nelson Mandela drives Rustenburg
Rustenburg Local Municipality	Environmental Officer		Kelebogile	Mekgoe	
Rustenburg Local Municipality	Ward 43 Councillor		Luan	Snyders	
Rustenburg Local Municipality	Ward 11 Ward Councillor		Cllr Simon	Phillemon	
Rustenburg Local Municipality	Ward 18 Ward Councillor		Jacobus	Johannes	
Rustenburg Local Municipality	Development and Planning		Bophelo	Rankudu	
Rustenburg Local Municipality	Planning & Human Settlement		Jan	Pieterse	
Rustenburg Local Municipality	Public Safety		Nelly	Rampete	
Rustenburg Local Municipality	Roads Management		Joseph	Khumalo	
Commenting authorities					
North West Department of Economic Development, Environment, Conservation and Tourism			Ellis	Thebe	
Department of Mineral Resources and Energy	Environmental Director		Desmond	Makamu	
Department of Water Affairs			Thato	Mjona	
Department of Rural Development and Land Reform			Victor	Tities	
			Reuben	Tlhabanelo	
			Kgomotso	Majova	
North West Department of Agriculture and Rural Development			David	Dikobe	
Provincial Heritage Resouces Agency-NW			Motlhabane	Mosiane	
South African Heritage Resources Agency		Heritage Officer	Natasha	Higgit	
Department of Public Works	District Operations	Chief Director: Distric	K	Gill	
	Intergrated Planning	Director: Integrated P	Henda	Pretorius	
	Roads Management		Alfred	Mafune	
Department of Public Works and Roads			Keoagile	Sitase	
Roads department Rustenburg Municipality	RLM Roads				
SANRAL	Statutory Control Section		Jan	Oliver	
Registered Interesed and Affected Parties					
Informal Settlement near Nkandla	Informal Settlement near Nk	Informal Settlement	Florance	Mokhooa	
Community Member			Olebogeng	Tlapu	
Prospecting Right Holder - Onalenna			Rainy	Mogaki	
Transnet			Juliet	Modipa	
Transnet			Londi	Kubheka	
Transnet			F	Mukanganyisi	
Transnet			Omphemetse	Chwaile	

Transnet			Sikhona	Mahobe	
Transnet			Otembele	Somlota	
Transnet			Relebelesele	Mashishi	
Transnet			Modipadi	Maboko	
Communities					
Buanjta primary school,Lekwakwa primary school(G.G)Lefika idwala b church					
Geelhoutpark primary,Tlhabanewest primary					
H.f Tlou high school,J.D Mosia School ,Tlhabane community school,Geelhoutpark open space					
Babedi lutheran,Motladikgwadikgwadi,Oukasi,Nkukise primary school.					
Tlhabane primary,Rampa Primary School,Lekwakwa					
Meriting Ext 1&2,Retlagona primary,Unit 13 health center					
Rustenburg Noord,Old municipal Building					
Olympia,Harry whulfse hall,vastrap primary school,Ng kerk					
Safarituin,cashan east 4&6,Berisig high school,protea park primary school.					
Mooka farm house,Geelhout park primary,Kloof primary school.					
Selly park secondary school,cashan open space					
David brink primary school,Trustenburg east ,Bobbies rusgby sport ground					
Iterelng supermarket,Sunriseview secondary schol					
Siza tent,Boitekong secondary school.					
Ntsedimane Garage,Rex supermarket,Rex Monato primary,Boschfonteinfarm,Olifansnek primary,boons Police station,Breedsvlei primary school,Methopestad primary school,Bakubung primary school.					
Paardekraal ext 1,Sondela,Jabula hostel,Banapele primary,million dollar ext 18&22					
Meriting community hall,seraleng,seraleng RDP					
Rustenburg Town hall,Bun Malan Beleggings					

Zinniaville,Seraleng Nkandla,Karlienpark					
			Letlhogonolo	Motlhanke	
			Lerato	Mphafudi	
			Ntswaki Margret	Baile	
			Simamkele	Nyenyiso	
			Noncedo	Nobula	
			Thabo	Pitsonyane	
			Bonolo	Sedumedi	
			Rosinah	Banda	
			Mmapaseka	Majila	
			Allie	Sejeso	
			Allie	Sejeso	
			Olwenkosi	Mcephe	
			Tankiso	Phuka	

SG CODE	**GEOM_AREA,N,18,8**	**Erven**	**Portion**	**2447**	**Title Deedowner**
T0JQ00270000244700024	56,75	2447	24	RE/24/2447	MUN RUSTENBURG
T0JQ00270000244700046	946,84	2447	46	RE/46/2447	MUN RUSTENBURG
T0JQ00270000251700001	12600	2517	1	1/2517	BLOUHEUWELS BELEGGINGS CC
T0JQ00270000251700000	22216,82	2517	0	RE/2517	INZINC AFRICA PTY LTD
T0JQ00270000222400000	2300,78	2224	0	RE/2224	Rustenburg Local Municipality

T0JQ00270000236500001	3600,16	2365	1	1/2365	MUN RUSTENBURG
T0JQ00270000231400000	3207,67	2314	0	RE/2314	Rustenburg Local Municipality
T0JQ00270000236500000	2686,2	2365	0	RE/2365	KINDOC NYWERHEIDSPERSELE PTY LTD
T0JQ00270000254000006	5386,48	2540	6	6/2540	No info available to match search criteria
T0JQ00270000254000004	4427,76	2540	4	4/2540	No info available to match search criteria
T0JQ00270000244700025	2522,33	2447	25	25/2447	HOSASA HOLDINGS PTY LTD
	2522,33	2447	25	25/2447	HOSASA HOLDINGS PTY LTD
T0JQ00270000244700054	443,3	2447	54	54/2447	MUN RUSTENBURG
T0JQ00270000244700060	9335,88	2447	60	RE/60/2447	MAITA WZITOMA PROP PTY LTD
	9335,88	2447	60	RE/60/2447	MAITA WZITOMA PROP PTY LTD
	9335,88	2447	60	RE/60/2447	MAITA WZITOMA PROP PTY LTD
T0JQ00270000244700049	585,96	2447	49	RE/49/2447	MUN RUSTENBURG
T0JQ00270000236500005	3670,91	2365	5	5/2365	BUSINESS PARTNERS LTD
T0JQ00270000265900000	2875,4	2659	0	2659	No info available to match search criteria
	3627,59	2659	0	2659	No info available to match search criteria
	3622,38	2659	0	2659	No info available to match search criteria
	2943,15	2659	0	2659	No info available to match search criteria
	2947	2659	0	2659	No info available to match search criteria
	2828,02	2659	0	2659	No info available to match search criteria
T0JQ00270000229500000	13148,17	2295	0	2295	Rustenburg Industrial Park CC

T0JQ00270000247600000	47635,21	2476	0	2476	Coca-Cola Beverages South Africa Pty Ltd and Abi Bottling Pty Ltd
T0JQ00270000252900000	21958,44	2529	0	2529	Amalgamated Beverage Industries Ltd
T0JQ00270000244700012	5633,19	2447	12	12/2447	BRECON TRADING & PROJECTS CC
T0JQ00270000244700001	2951,03	2447	1	1/2447	CONRADIE DESIREE LOUISE
T0JQ00270000244700002	2207,83	2447	2	2/2447	Indvestic cc
T0JQ00270000244700003	2205,72	2447	3	3/2447	Uptown Trading 305 cc
T0JQ00270000244700004	2210,56	2447	4	4/2447	Ragie Abdul Aziz, Saloojee Ahmed Yusuf, Ebrahim Muhammed and Ragie Mohammed
T0JQ00270000244700005	2206,4	2447	5	5/2447	Great Rhino INV cc
	2206,4	2447	5	5/2447	Great Rhino INV cc
T0JQ00270000244700006	2205,7	2447	6	6/2447	Are Ananeng Construction Pty Ltd
T0JQ00270000244700007	2209,92	2447	7	7/2447	Sons and Joseph Motor Repairs
T0JQ00270000244700008	2205,69	2447	8	8/2447	Essah Abdulsataar Omar
T0JQ00270000244700009	2205,69	2447	9	9/2447	Erf 2447/9 Rustenburg cc
T0JQ00270000244700010	2209,91	2447	10	10/2447	Wetzlar prop Pty Ltd
	2209,91	2447	10	10/2447	Wetzlar prop Pty Ltd

T0JQ00270000225800000	23767,23	2258	0	2258	Waterflex Pty (Ltd)
T0JQ00270000225700000	26927,93	2257	0	2257	Torero Inv 6 Pty Ltd
T0JQ00270000226500000	11149,07848	2265	0	RE/2265	SAIDOO GROUP INV PTY LTD
	11149,07848	2265	0	RE/2266	SAIDOO GROUP INV PTY LTD
	11149,07848	2265	0	RE/2265	SAIDOO GROUP INV PTY LTD
	10918,56396	2266	0	RE/2266	Afri Ready Mix (Pty) Ltd
T0JQ00270000226600001	10066,37	2266	1	1/2266	Afri Ready Mix (Pty) Ltd
T0JQ00270000242000000	74764	2420	0	2420	Glencore Operations South Africa Pty Ltd
T0JQ00270000225600000	25120,79	2256	0	2256	North West Recycling cc
T0JQ00270000229100001	2504,29	2291	1	1/2291	LA GAS DISTRIBUTORS PTY LTD
T0JQ00270000254000008	4559,21	2540	8	8/2540	No info available to match search criteria
T0JQ00270000254000007	5273,25	2540	7	7/2540	No info available to match search criteria
T0JQ00270000254000005	5617,73	2540	5	5/2540	No info available to match search criteria
T0JQ00270000254000003	5615,1	2540	3	3/2540	No info available to match search criteria
T0JQ00270000254000001	5459,31	2540	1	1/2540	No info available to match search criteria
T0JQ00270000254000002	4561,41	2540	2	2/2540	No info available to match search criteria
T0JQ00270000228700000	21195,87	2287	0	2287	CAJINVEST PTY LTD

	21195,87	2287	0	2287	CAJINVEST PTY LTD
T0JQ00270000228800000	23746,34	2288	0	2288	ERF Rustenburg Ext 9, Rustenburg Municipality
T0JQ00270000228900000	20797,75	2289	0	2289	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000229000000	21093,92096	2290	0	2290	RUSTENBURG PLAASLIKE OORGANGSRAAD
T0JQ00270000244700014	5774,99	2447	14	14/2447	RUSTENBURG P O
T0JQ00270000244700013	9232,62	2447	13	13/2447	ERF Rustenburg Ext 9, Rustenburg Municipality
	9232,62	2447	13	13/2447	ERF Rustenburg Ext 9, Rustenburg Municipality
	9232,62	2447	13	13/2447	ERF Rustenburg Ext 9, Rustenburg Municipality
	9232,62	2447	13	13/2447	ERF Rustenburg Ext 9, Rustenburg Municipality
	9232,62	2447	13	13/2447	ERF Rustenburg Ext 9, Rustenburg Municipality
T0JQ00270000229100002	2961,67	2291	2	2/2291	5 ERFS PROP DEVELOPERS 1 CC
T0JQ00270000228400000	23575,88	2284	0	2284	RUSTENBURG PLAASLIKE OORGANGSRAAD
		2284	2	2284	C F A O MOBILITY PTY LTD
T0JQ00270000228300000	10622,66	2283	0	RE/2283	NORM INV (JOHANNESBURG) PTY LTD
	8992,74	2283	1	1/2283	ACTOM PTY LTD

T0JQ00270000228300001	8992,74	2283	1	1/2283	ACTOM PTY LTD
T0JQ00270000228200000	22129,67	2282	0	2282	RUSTENBURG PLAASLIKE OORGANGSRAAD
T0JQ00270000228100000	21768,43	2281	0	2281	RUSTENBURG LOCAL MUNICIPALITY
T0JQ00270000227100000	8600,09	2271	0	2271	WOODPECKER GROVE INV CC
T0JQ00270000226700000	20047,64	2267	0	2267	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000226800000	20563,49	2268	0	2268	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000226900000	21401,98	2269	0	2269	Avron Property Holdings cc
T0JQ00270000227000000	27265,93459	2270	0	2270	RUSTENBURG LOCAL MUNICIPALITY
T0JQ00270000228000000	20709,6	2280	0	2280	RUSTENBURG LOCAL MUNICIPALITY
T0JQ00270000227900000	7779,01	2279	0	RE/2279	MUN Rustenburg
T0JQ00270000227700000	19884,7	2277	0	2277	RUSTENBURG LOCAL MUNICIPALITY
T0JQ00270000225200000	22544,8	2252	0	2252	Rustenburg Transitional Council
T0JQ00270000225100000	21343,2	2251	0	2251	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000225000000	21319,75	2250	0	2250	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000224900000	21309,31	2249	0	2249	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000224800000	21127,78	2248	0	2248	Eskom Holdings Ltd
T0JQ00270000227200000	12662,1	2272	0	2272	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000227600000	24951,98	2276	0	2276	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD

T0JQ00270000227400000	15870,46	2274	0	2274	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223300001	5692,14	2233	1	1/2233	No info available to match search criteria
T0JQ00270000222900000	19307,79	2229	0	2229	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223000000	23660,94	2230	0	2230	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223100000	25299,43	2231	0	2231	XSTRATA SOUTH AFRICA PTY LTD
T0JQ00270000223200000	28897,78	2232	0	2232	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223300000	7984,76	2233	0	2233	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223300002	5849,78	2233	2	2/2233	No info available to match search criteria
T0JQ00270000221100000	25291,55	2211	0	2211	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000221600000	22462,96	2216	0	2216	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000227300000	18466,3	2273	0	2273	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000227500000	20435,46	2275	0	2275	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000266000000	63290,25	2660	0	2660	No info available to match search criteria
T0JQ00270000221200000	22508,71	2212	0	2212	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000223800000	16831,9	2238	0	2238	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000224200000	14089,05	2242	0	2242	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000224100000	10901,35	2241	0	2241	MUN Rustenburg
T0JQ00270000224000000	12058,51	2240	0	2240	No info available to match search criteria
T0JQ00270000223900000	11280,27	2239	0	2239	ERF Rustenburg Ext 9, Rustenburg Local Municipality
T0JQ00270000244700056	8009,11	2447	56	56/2447	No info available to match search criteria
	8009,11	2447	56	56/2447	No info available to match search criteria
	8009,11	2447	56	56/2447	No info available to match search criteria

	8009,11	2447	56	56/2447	No info available to match search criteria
T0JQ00270000244700059	8381,24	2447	59	59/2447	No info available to match search criteria
	8381,24	2447	59	59/2447	No info available to match search criteria
	8381,24	2447	59	59/2447	No info available to match search criteria
	8381,24	2447	59	59/2447	No info available to match search criteria
T0JQ00270000244700018	2590,96	2447	18	18/2447	WATERVAL GRANIETWERKE CC
T0JQ00270000244700019	2546,51	2447	19	19/2447	WATERVAL EIENDOMME CC
T0JQ00270000244700020	3618,56	2447	20	20/2447	WATERVAL EIENDOMME CC
T0JQ00270000244700033	2686,34	2447	33	33/2447	SATMAR INV PTY LTD
T0JQ00270000244700032	2248,85	2447	32	32/2447	SATMAR INV PTY LTD
T0JQ00270000244700031	2370,81	2447	31	31/2447	TELKOM S A LTD
T0JQ00270000244700030	2314,52	2447	30	RE/30/2447	SATMAR INV PTY LTD
	2314,52	2447	30	RE/30/2447	SATMAR INV PTY LTD
T0JQ00270000244700058	199,97	2447	58	58/2447	PLAASLIKE OORGANGSRAAD VAN RUSTENBURG & OMGEWING
T0JQ00270000244700029	2034	2447	29	29/2447	Mohammed Hamid
T0JQ00270000244700028	2027,93	2447	28	28/2447	Masy Inv CC
T0JQ00270000244700027	2023,63	2447	27	27/2447	Waterval Granietwerke CC
T0JQ00270000244700048	1535,06	2447	48	48/2447	GOUSBLOM CENTRE CC
T0JQ00270000244700047	1874,69	2447	47	47/2447	Rodney Vermaak Familie Trust
	1874,69	2447	47	47/2447	Rodney Vermaak Familie Trust
T0JQ00270000244700043	2395,34	2447	43	43/2447	Rustenburg P O
T0JQ00270000244700042	2861,17	2447	42	42/2447	Hamar Familie Trust

T0JQ00270000244700041	3061,74	2447	41	41/2447	VERNTECH ENTERPRISES PTY LTD
T0JQ00270000244700040	3041,28	2447	40	40/2447	MOODLEY IVAN DOORSAMY
T0JQ00270000244700039	2303,55	2447	39	RE/39/2447	Tarlton Family Trust
T0JQ00270000244700053	146,4	2447	53	53/2447	MUN Rustenburg
T0JQ00270000244700038	2017,61	2447	38	38/2447	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000244700037	2188,48	2447	37	37/2447	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000244700036	2450,63	2447	36	36/2447	B P Plant Rentals Pty Ltd
T0JQ00270000244700035	2996,48	2447	35	35/2447	PRO SOIL DISTRIBUTORS PROJECTS PTY LTD
T0JQ00270000244700034	3037,79	2447	34	34/2447	A S I O Prop Inv CC
T0JQ00270000236500010	3992,91	2365	10	10/2365	Rustpa Prop Pty Ltd
T0JQ00270000236500009	4148,89	2365	9	9/2365	Hualong Trading CC
T0JQ00270000236500007	2612,64	2365	7	7/2365	Charora Enterprise Pty Ltd
	2612,64	2365	7	7/2365	Charora Enterprise Pty Ltd
T0JQ00270000236500008	2807,93	2365	8	8/2365	BUSINESS PARTNERS LTD
T0JQ00270000236500006	3578,97	2365	6	6/2365	Fried Euler Trust
T0JQ00270000236500004	3358,38	2365	4	4/2365	BUSINESS PARTNERS LTD

T0JQ00270000236500003	2468,03	2365	3	3/2365	EQUAL TRADE 4 PTY LTD
T0JQ00270000236500002	3367,64	2365	2	2/2365	BUSINESS PARTNERS LTD
T0JQ00270000222000000	19103,66	2220	0	2220	ROYAL BAFOKENG NATION
T0JQ00270000222100000	13597,45	2221	0	RE/2221	CEMBLOCKS PTY LTD
T0JQ00270000222100001	1735,36	2221	1	1/2221	BLUE CLOUD INV 20 CC
T0JQ00270000222100002	1490,78	2221	2	2/2221	TAYOB FARIDA
T0JQ00270000222200002	9125,71	2222	2	2/2222	CLAUDIA'S TRUST
	9125,71	2222	2	2/2222	CLAUDIA'S TRUST
	9125,71	2222	2	2/2222	CLAUDIA'S TRUST
	9125,71	2222	2	2/2222	CLAUDIA'S TRUST
T0JQ00270000222200001	5820,29	2222	1	1/2222	EVE PROP PTY LTD
T0JQ00270000222200000	9124,96	2222	0	RE/2222	DOBIE TRUST
T0JQ00270000222400003	4002,28	2224	3	3/2224	NUGVILLE INV PTY LTD

T0JQ00270000222500000	21941,77	2225	0	2225	ERF 2225 RUSTENBURG PTY LTD
T0JQ00270000221900000	15880,44	2219	0	2219	Gensec Engineering CC
	15880,44	2219	0	2221	Gensec Engineering CC
T0JQ00270000221800000	20036,75	2218	0	2218	RUSTENBURG LOCAL MUNICIPALITY
T0JQ00270000221700000	20083,33	2217	0	2217	ERF 2225 RUSTENBURG PTY LTD
	20083,33	2217	0	2217	ERF 2225 RUSTENBURG PTY LTD
T0JQ00270000223400001	5677,7	2234	1	1/2234	No info available to match search criteria
T0JQ00270000223400002	4388,77	2234	2	2/2234	No info available to match search criteria
T0JQ00270000223400003	5637,58	2234	3	3/2234	No info available to match search criteria
T0JQ00270000223400000	3782,02	2234	0	RE/2234	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000219600000	29713,87	2196	0	2196	BAFOKENG TRIBE
T0JQ00270000231400001	271,1	2314	1	1/2314	No info available to match search criteria
T0JQ00270000219000000	3887,12	2190	0	RE/2190	FIDELIO PROP PTY LTD
T0JQ00270000219000002	4606,53	2190	23565	2/2190	FIDELIO PROP PTY LTD
T0JQ00270000219000001	4606,57	2190	1	1/2190	FIDELIO PROP PTY LTD
T0JQ00270000219100000	4634,37	2191	0	RE/2191	FIDELIO PROP PTY LTD

T0JQ00270000219100001	4624,19	2191	1	1/2191	TSHEMA HOLDING PTY LTD
T0JQ00270000219300000	5914,05	2193	0	RE/2193	Z R EIENDOMME PTY LTD
T0JQ00270000219400001	6512,48	2194	1	1/2194	S V R STEEL WORKS PTY LTD
T0JQ00270000219400000		2194	0	0/2194	S V R STEEL WORKS PTY LTD
T0JQ00270000219500000	11797,05	2195	0	2195	S V R STEEL WORKS PTY LTD
	13661,29	2195	0	2195	S V R STEEL WORKS PTY LTD
	13661,29	2195	0	2195	S V R STEEL WORKS PTY LTD
	13661,29	2195	0	2196	S V R STEEL WORKS PTY LTD
	11797,05	2195	0	2195	S V R STEEL WORKS PTY LTD
	13661,29	2195	0	2195	S V R STEEL WORKS PTY LTD
	13661,29	2195	0	2195	S V R STEEL WORKS PTY LTD
T0JQ00270000224700000	18436,63	2247	0	2247	GLENCORE OPERATIONS SOUTH AFRICA PTY LTD
T0JQ00270000265900000	2826,57	2659	0	2659	No info available to match search criteria
	3624,51	2659	0	2659	No info available to match search criteria
	3520,45	2659	0	2659	No info available to match search criteria
	3117,34	2659	0	2659	No info available to match search criteria
	3577,7	2659	0	2659	No info available to match search criteria
	3608,16	2659	0	2659	No info available to match search criteria
	3035,99	2659	0	2659	No info available to match search criteria

	3008,92	2659	0	2659	No info available to match search criteria
	3883,81	2659	0	2659	No info available to match search criteria
	4344,39	2659	0	2659	No info available to match search criteria
	4275,48	2659	0	2659	No info available to match search criteria
	5692,57	2659	0	2659	No info available to match search criteria
T0JQ00270000223600000	3374,65	2236	0	RE/2236	Glencore Operations SA (Pty) Ltd
T0JQ00270000223600001	2815,46	2236	1	1/2236	No info available to match search criteria
T0JQ00270000223500000	16694,25	2235	0	2235	Glencore Operations SA (Pty) Ltd
T0JQ00270000223600002	3236,09	2236	2	2/2236	No info available to match search criteria
T0JQ00270000223600003	3855,72	2236	3	3/2236	No info available to match search criteria
T0JQ00270000223700000	16183,01	2237	0	2237	Glencore Operations SA (Pty) Ltd
T0JQ00270000220100000	24054,99	2201	0	2201	XSTRATA SOUTH AFRICA PTY LTD
T0JQ00270000219700000	25846,36	2197	0	2197	Glencore Operations SA (Pty) Ltd
T0JQ00270000219800000	24531,93	2198	0	2198	Glencore Operations SA (Pty) Ltd
T0JQ00270000219900000	24706,75	2199	0	2199	Glencore Operations SA (Pty) Ltd
T0JQ00270000220000000	24860,42	2200	0	2200	Glencore Operations SA (Pty) Ltd
T0JQ00270000220200000	21365,9	2202	0	2202	MUN RUSTENBURG
T0JQ00270000220300000	20684,41	2203	0	2203	MUN RUSTENBURG
T0JQ00270000220400000	19372,61	2204	0	2204	MUN RUSTENBURG
T0JQ00270000221000000	25178,78	2210	0	2210	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000220900000	23803,95	2209	0	2209	MUN RUSTENBURG

T0JQ00270000220800000	23848,29	2208	0	2208	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000220700000	13085,51	2207	0	2207	MUN RUSTENBURG
T0JQ00270000220600000	18972,31	2206	0	2206	MUN RUSTENBURG
T0JQ00270000220500000	18747,93	2205	0	2205	ERF Rustenburg Ext 9, Rustenburg Municipality **For info refer to Registrar of Deeds**
T0JQ00270000244700000	96130,23	2447	0	RE/2447	MUN RUSTENBURG
T0JQ00270000229100004	6773,569132	2291	4	4/2291	no match on WinDeed website
T0JQ00270000253900000	47235,74624	2539	0	2539	R C L FOODS CONSUMER PTY LTD
T0JQ00270000231200001	5534,1476	2312	1	1/2312	No information to display (TRANSNET LTD?)
T0JQ00270000716900000	5213,406483	7169	0	7169	RUSTENBURG LOCAL MUNICIPALITY
	5213,406483	7169	0	7169	RUSTENBURG LOCAL MUNICIPALITY
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T0JQ00270000219300001		2193	1	1/2193	Z R EIENDOMME PTY LTD

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T0JQ00270000219100002	4627,879656	2191	2	2/2191	DIZOMODE CC
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T0JQ00270000222700004	2884,6257	2227	4	4/2227	No info available to match search criteria
T0JQ00270000222700005	2754,6642	2227	5	5/2227	No info available to match search criteria
T0JQ00270000222700006	2501,57982	2227	6	6/2227	No info available to match search criteria
T0JQ00270000222700007	2516,93833	2227	7	7/2227	No info available to match search criteria
T0JQ00270000222700008	1343,55965	2227	8	8/2227	No info available to match search criteria
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T0JQ00270000222800005	2514,732253	2228	5	5/2228	No info available to match search criteria
T0JQ00270000222800006	2508,236331	2228	6	6/2228	VALOTYPE 216 CC
T0JQ00270000222800007	1142,201232	2228	7	7/2228	No info available to match search criteria
T0JQ00270000222600000	24836,09512	2226	0	2226	FERROCHROME FURNACES PTY LTD
	24836,09512	2226	0	2226	FERROCHROME FURNACES PTY LTD
T0JQ00270000721500000	33564,94127	7215	0	7215	no match on WinDeed website

Portion 1 of the Farm Town and townlands of Rustenburg: Farm 272					

Minutes

Sibanye-Stillwater	
31 May 2024	

Meeting Details:
Project 1: The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

Project 2: Schaapkraal and Zwartkoppies prospecting Right Incorporation into the Western Platinum Limited Mining Right

Date: 31 May 2024	Time: 10:30	Place: Microsoft Teams
Meeting called	Kirthi Peramaul (KP)	
Type of meeting	Pre-application meeting with DMRE	
Facilitator	Kirthi Peramaul	
Note taker	Kirthi Peramaul	
Attendees	Kirthi Peramaul (KP) – Alta van Dyk Environmental Consultants Pty Ltd Yolande Janse van Rensburg (YJvR) – Sibanye Stillwater Desmond Makamu (DM) – Department of Mineral Resources and Energy	
Apologies	None	

Opening and Welcome

- KP welcomed all present
- KP undertook a safety moment

Presentation and Discussion: Project 1

See the PowerPoint Presentation appended.

- KP presented the slides

- DM thanked KP for the presentation
- KP added that the proposed expansion of the Kwezi Underground Operations is critical for Sibanye Stillwater and in order to the Kwezi Shaft to continue being operational.
- DM required confirmation, if the proposed expansion will have an effect on the surface infrastructure and whether there will be any associated infrastructure
    - KP confirmed that the Kwezi underground mining block are existing and that the proposal is that all existing infrastructure to be utilized for the proposed expansion.
- DM enquired in respect of the waste management activity being applied for. Will this activity require surface infrastructure.
    - KP explained that the waste rock from the underground mining will not be brought to the surface. The waste rock will be packed underground. Category A Activity 13 of the NEMWA was seen to be applicable as the project is for expansion activities.
- KP advised that in terms of the Financial Provisioning, the project will be covered under the annual Financial Provision submitted by Sibanye Stillwater to the DMRE on an annual basis.
    - DM advised that according to Section 24 P of NEMA each application of Environmental Authorization must be accompanied by Financial Provision. In this case the applicant will need to motivate as to why this project is not specifically catered for. Meaning why this project will not have its own financial provision. What are the grounds and why has the applicant decided on such. The motivation is required for the DMRE to make a decision and understand why the financial provision was not included.

- KP had a clarity question on whether the application form is an amendment form or the EA application form.
    - DM requested clarity in terms of the application and if it triggers any application associated with the mining rights
    - YJvR confirmed that the project triggers a Section 102 application
    - DM confirmed that if the application affects the Mining Right then the procedure will be that the application must be lodged on SAMRAD, then the relevant section which would take part in this application will acknowledge the application. This application will affecte the Mine Works Program so the relevant section needs to be responsible for acknowledgment. The environmental application can only be discussed once the application on SAMRAD has been acknowledge.
    - DM acknowledged that the project has a schedule that needs to be followed according to the timeframes that are regulated from the DMRE's Side. The DMRE Environmental Section will have to wait for the relevant sections to acknowledge the application before the Environmental process can begin
    - YJvR added that this is a very critical project for Sibanye Stillwater and she is concerned with the 102-process running on the one side and then our environmental process running on the other side concurrently with the start dates. Various options were looked at in extending the life on mine for Kwezi. The big goal of the inclusion of these blocks is to expand the life with three years or four years, which means Sibanye Stillwater won't have to close the shaft by next year March.
    - YJvR raised a concern that if the Section 1O2 is only going to be acknowledged quite later in the year, as the environmental process has its own timelines. An example is the WPL Section 102 application which was submitted in 2023 and no acknowledgement has been received. Requested if there is a possibility that the

Presentation and Discussion: Project 2

- See the PowerPoint Presentation appended.
    - KP presented the slides

- KP indicated that it is important to note that, This application is for the inclusion of the Schaapkraal and Zwartkoppies Prospecting Right Area into the existing SS WPL Mining Right Area only. Should be viewed as sustaining the long-term viability of the existing WPL mining operations. add much needed ounces to keep both shafts production profiles at the sustainable levels. No infrastructure or associated mining activities are being applied for as part of this application. If SS requires further approval for any planned infrastructure or associated activities a separate approval process will be required to be undertaken
- DM advised that the same will be applicable to Schaapkraal project:
    - The Environmental process can only commence once the Section 102 application has been acknowledged. AvDE can then submit the EA application form.
- DM advised that the matter can be discussed with the Regional manager on the 6 June 2024.
- DM advised that according to Section 24 P of NEMA each application of Environmental Authorization must be accompanied by Financial Provision. In this case the applicant will need to motivate as to why this project is not specifically catered for. Meaning why this project will not have its own financial provision. What are the grounds and why has the applicant decided on such. The motivation is required for the DMRE to make a decision and understand why the financial provision was not included.

Action Items	Person	Deadline

Minutes

Sibanye-Stillwater	
31 May 2024	

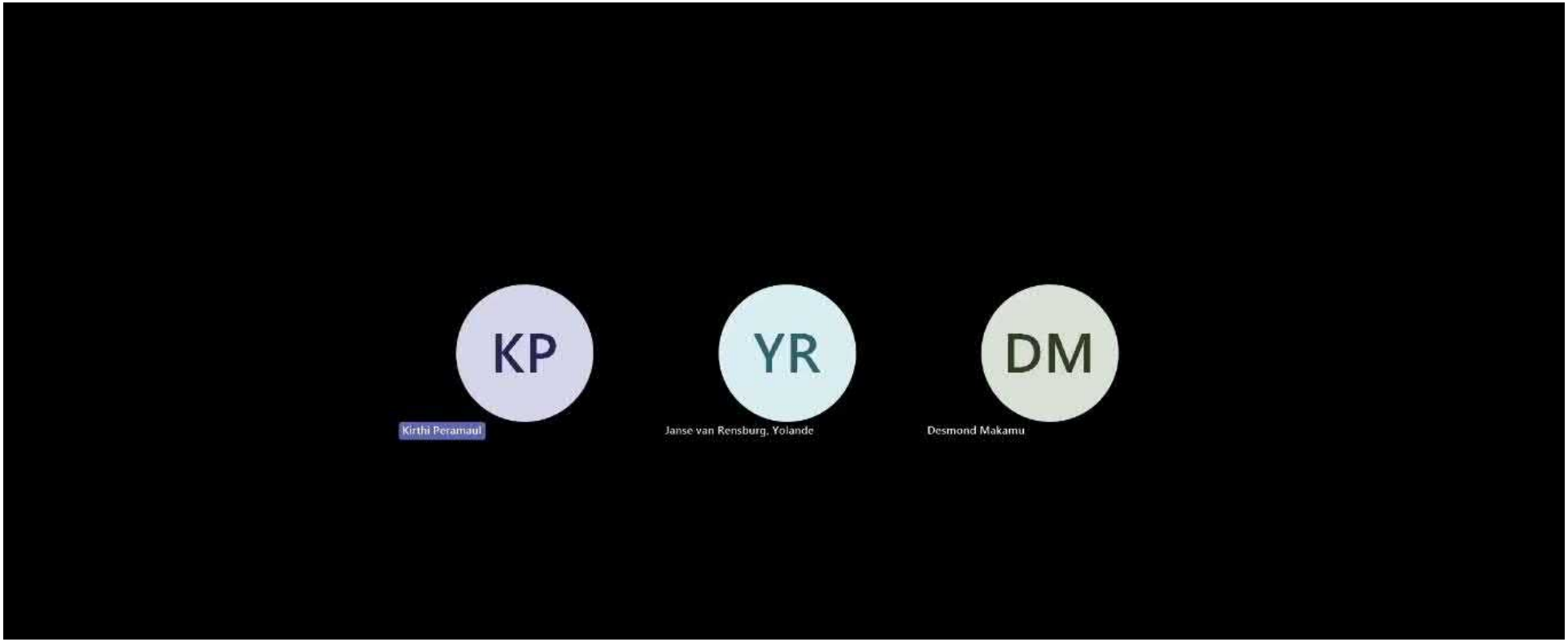
Send Presentation to Desmond	Kirthi Peramaul	ASAP
Sibanye Stillwater to discuss the Section 102 & EA application process with the Regional Manager on the 6	Yolande Janse van Rensburg	6 June 2024

Minutes

Sibanye-Stillwater	
31 May 2024	

Meeting's Signed Attendance Register

Teams Meeting Undertaken.



BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

PROJECT ANNOUNCEMENT, I&AP REGISTRATION AND AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT

Applicant: Sibanye Rustenburg Platinum Mines (Pty) Ltd
Location: RE Portion 1 and 27 of Farm Town and Townlands of Rustenburg 272, Various Erven

Project Description: Kwezi Shaft MR Expansion

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft

In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025. Alta van Dyk Environmental (Pty) Ltd (AvDE) has been appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the required environmental-related applications and associated public participation process.

Authorisations required:

Before the commencement of the proposed expansion project, Sibanye requires Environmental Authorisation. The following authorisations are required as per the applicable legislation:

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA.
    - The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).
- Water Use Licence Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998).
    - Section 21 c&i and g water uses
    - The Competent Authority is the Department of Water and Sanitation.

Registration as an Interested and Affected Party

Public Participation forms an integral part of the environmental authorisation and WULA processes. You are hereby invited to register as an Interested and Affected Party (I&AP) by contacting the EAP below, should you wish to receive additional information on the proposed project, or raise any comments regarding the proposed project. Registered I&APs will be informed of the availability of the Draft Basic Assessment Report for public comment. If you would like to register as an I&AP, require more information on the proposed project, comment on the proposed project or would like to receive a copy of the Background Information Document, please contact:

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457
Fax number: 086 634 3967
Postal Address: Postnet Suite #745,
Private Bag X 1007,
Lyttelton, 0140
Email: kirthi@avde.co.za

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

KITSISO YA KOPO YA TUMELELO YA TIRISO YA TIKOLOGO, LE KOPO YA TUMELELO YA TIRISO YA METSI GO TLHABOLOLA TUMELELO YA MOEPO YA NW 80 MR, GAMMOGO LE KATOLOSO YA MOEPO YA KWEZI KA GO TSENYELETSA DIKAROLWANA TSA UG (KAROLWANA A LE B)

MASEPALA LEGAE WA RUSTENBURG, PROFENSENG YA BOKONE BOPHIRIMA

KITSISO YA POROJEKE, DITLHAGISO MABAPI LE PHATLHALATSO YA DITOKUMENTE TSA TLHALOSO YA POROJEKE, LE GO DUMEMELA MALOKO A A AMEGANG LE A A NANG LE KGATLHEGO GO FA DITSHWAELO

Kopo e dirwa ke: Sibanye-Stillwater – Sibanye Rustenburg Platinum Mines (Pty) Ltd

Lefelo la Projeke: Karolo ya ntlha ya Polase ya Farm Town and Townlands ya Rustenburg 272, Mafelo a a farologaneng

Tlhaloso ya Projeke: Katoloso ya ya tumelelo ya moepo ya Kwezi Shaft

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) ke karolo e nngwe e e welang ka fa tlase ga setlhopha sa dikgwebo tsa Sibanye Stillwater Limited. Kwezi Shaft e ka fa tlase ga taolo ya Sibanye Rustenburg Platinum Mines (Pty) Ltd. Kwezi Shaft e epa leswika la UG2 le le setseng, ka fa tlase ga lefelo la moepo la nomoro ya kitsiso ya NW 30/5/1/2/2/80 MR. Shafote e, e bonala e ya kwa tlase ka go ntsha diminerale, mme e tlile go dira go fitlha ka ngwaga wa 2027. Go na le tlhokagalo ya go thwala diminerale tsa Platinum Group Metals (PGMs) ka bonako go dira gore Shafote ya Kwezi e kgone go fitlhelela go epa diminerale tse di lebeletsweng.

Ke maikaelelo a Sibanye Rustenburg Platinum go katolosa mafelo a a dumeletsweng a ditirelo tsa meepo, ka fa tlase ga tumelelo ya (NW 30/5/1/2/2/80 MR) ka go tsenyeletsa dinaga tsa mafelo a a farologaneng kwa motse -seteropong wa Rustenburg, Profinsi ya Bokeno Bophirima. Godimo ga katoloso ya moepo e e akanngwang, SRPM e rata e ka epa leswika la UG2 Shallows (Karolo A le B). Go epa leswika la UG2 ka nako go tla oketsa boleng jwa diminerale tse di tswang mo shafoteng ya Kwezi, pele ga diminerale tse di ka fokotsega kwa tshimologong ya ngwaga wa 2025. Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) e thapilwe jaaka baitseanape ba ba ikemetseng go etelela pele dikopo tsa tiriso ya tikologo, le go itsisa batsaakarolo ka ga projeke e.

Dikopo tse di tlhokegang:

Pele ga katoloso e e tshitshinngwang, Sibanye Rustenburg Platinum Mines (Pty) Ltd e tlhoka tumelelo ya tiriso ya tikologo. Go tlhokega Dikopo le ditumelelano tse di tlhokegang ke tse di latelang:

- Tlhatlhobo ya tikologo e e sosobantsweng go ya ka molao Bosetšhaba wa Tikologo (NEMA) (Molao 107 wa 1998) (NEMA) le molao wa tlhokomelo ya matlakala a a tswang mo meepong (Waste Act (59 ya 2008), e tshegetsa kopo ya S102 jaaka e tlhalosiwa ke MPRDA.
    - Lefapha la Diminerale le matla la Profense ya Bokone Bophirima
- Kopo ya tiriso ya metsi go ya ka Molao wa Bosetšhaba wa tiriso ya metsi (NWA) (Act 36 ya 1998)
    - Karolo ya 21 c, i, le g ya badirisi ba metsi
    - Lefapha la Metsi le botlhweki (DWS) ke lona le nang le maikarabelo a kopo e.

Go ikwadisa jaaka leloko le le amegang e bile le na le kgatlhego ka ga Projeke

Go botlhokwa gore setšhaba se itsisiwe ka ga dikopo tse tsa tumelelo ya tiriso ya tikologo, gammogo le kopo ya tiriso ya metsi. Ka jalo, o lalediwa gore o ikwadise jaaka leloko le le amegang, e bile le na le kgatlhego ka ga projeke e, ka go ikopanya le baitseanape ba ba ikemetseng ba ba thapilweng go etelela pele dikopo tsa tiriso ya tikologo, fa o ka nna le kgatlhego ya go amogela kitso e e tseneletseng ka ga projeke. Maloko a a amegang, e bile a na le kgatlhego ka ga projeke, ao a ikwadisitseng a tla itsisiwa ka phatlhalatso ya dikwala tse di tlhalosang projeke gore ba kgone go sekaseka dikwalwa tse, e bile ba kgone go dira ditshwaelo.

Fa o rata go ikwadisa jaaka motho yo a amegang kgotsa yo a nang le kgatlhego mo Projekeng e, e bile o rata go ka amogela kitso e e tseneletseng ka ga Projeke, o kopiwa gore o ikopanye le:

Kirthi Peramaul

Alta van Dyk Environmental Consultants (Pty) Ltd

Nomoro ya mogala: 012 940 9457

Nomoro ya fekese: 086 634 3967

Aterese ya poso: Postnet Suite #745,

Private Bag X 1007,

Lyttelton, 0140

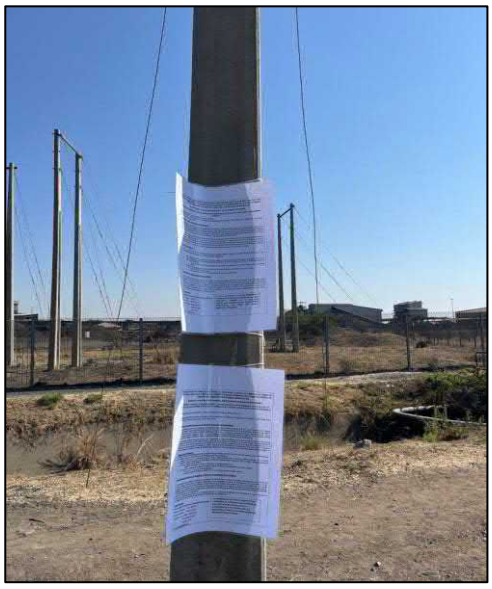
Emeile: kirthi@avde.co.za

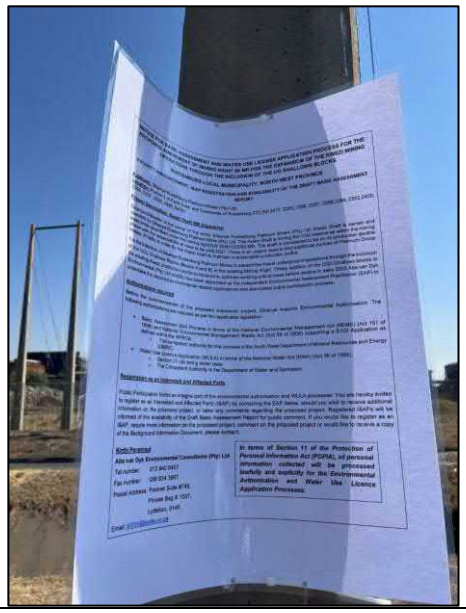
Go latela kgaolo ya lesome nngwe (11) ya Tshireletso ya Tshedimosetso ya Sebele ya Semolao, tshedimosetso yotlhe e e kokoantsweng e tla e dirisiwa fela mo tsamaisong ya kopo ya tumelelo ya tirso ya tikologo le tiriso ya metsi .

NOTICE FOR THE BASIC ASESSMENT AND WATER USE LICENSE APPLICATION PROCES FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUG THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORT WEST PROVINCE PROJECT ANNOUNCEMENT, I&AP REGISTRATION AND AVAILABILITY OF THE DRAFT BASIC ASSSESSMENT REPORT.

Site Notices Placed on the 3 September 2024 and 12 September 2024

Site Notice 1: Coordinates 25°37'36.32"S 27°13'41.44"E Glencore Plant entrance

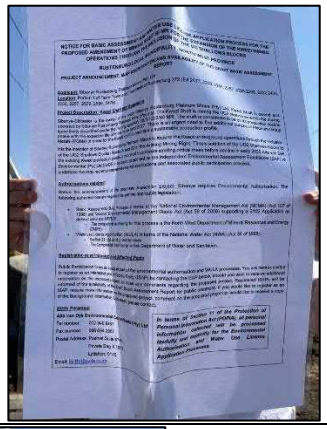


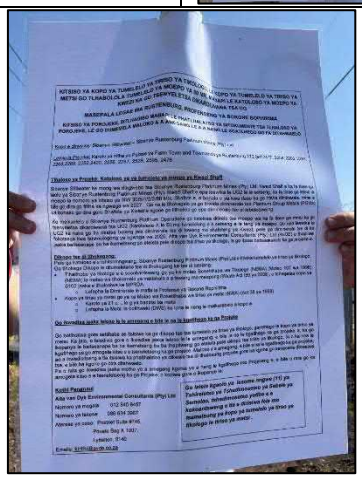




Site Notice 2: Coordinates 25°37'45.54"S 27°13'46.78"E Outside of Steel Trading property



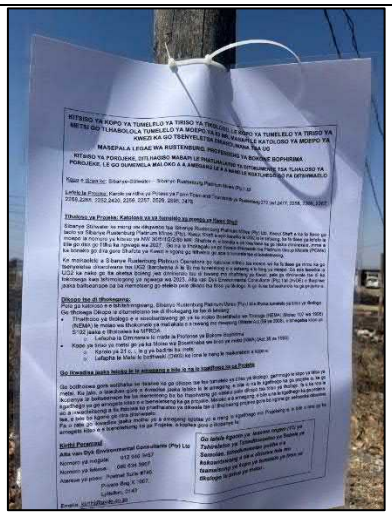




Site Notice 3: Coordinates 25°38'2.58"S 27°14'19.13"E Start of informal settlement





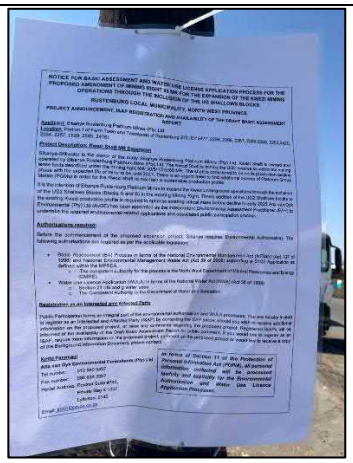
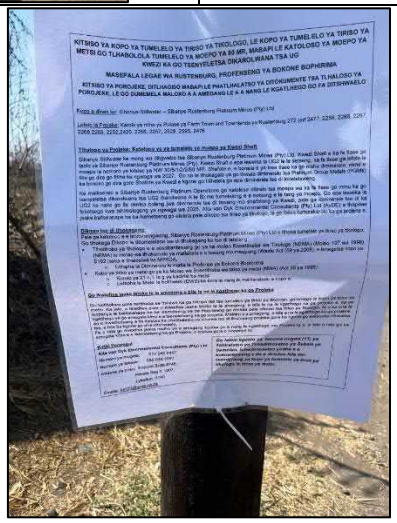


Site Notice 4: Coordinates 25°37'53.05"S 27°14'8.39"E Near Volt Amp Technologies

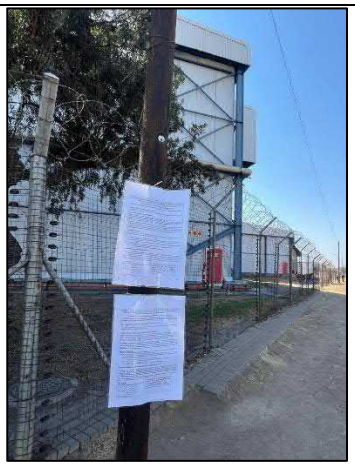


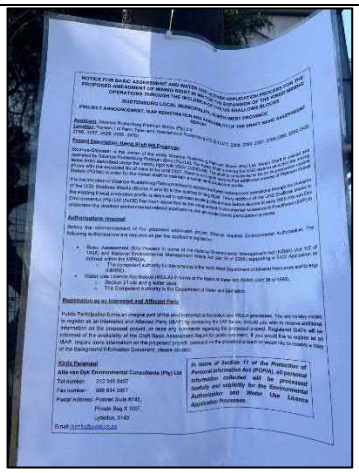


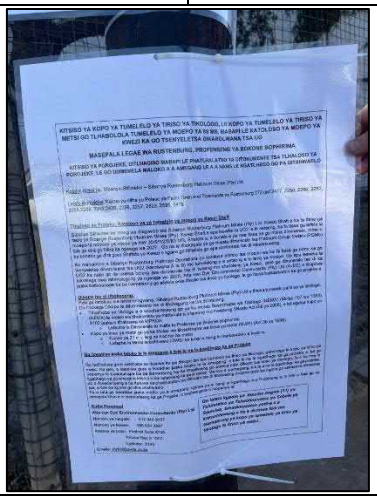


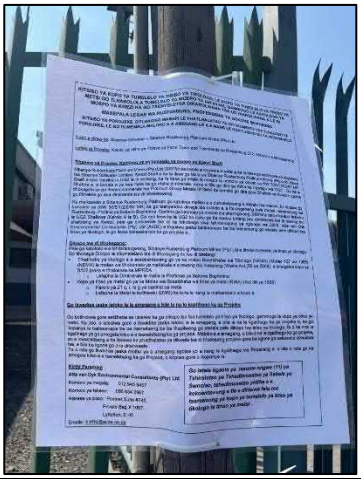
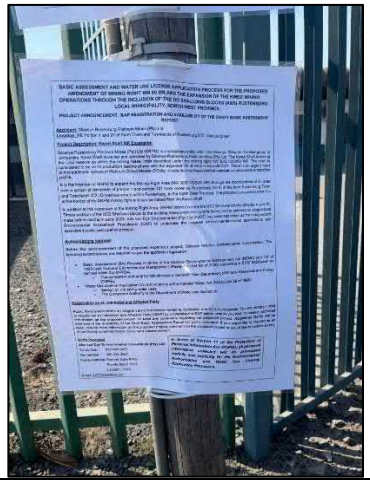
Site Notice 5: Coordinates 25°38'12.04"S 27°14'8.65"E Rainbow Chicken Truck entrance	
	
	

Site Notice 6: Coordinates 25°38'19.17"S 27°14'1.36"E Outside Rainbow Chicken	



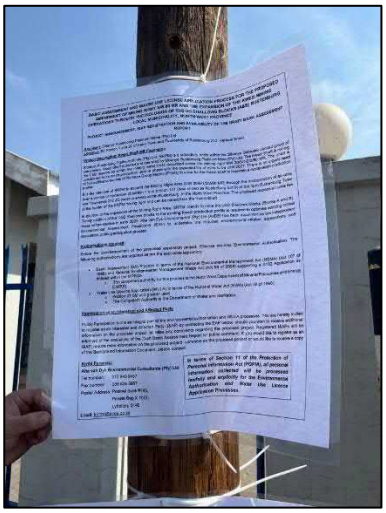


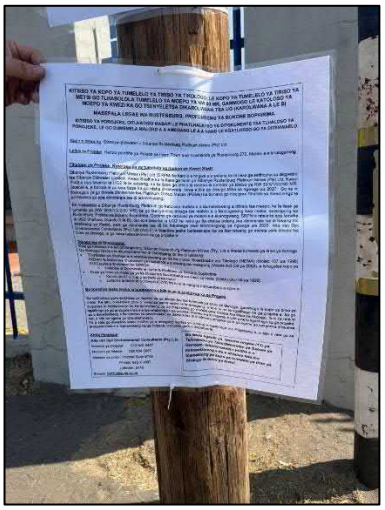


Site Notice 7: Coordinates 25°38'17.57"S 27°13'42.93"E Near S&S Engineering	
	

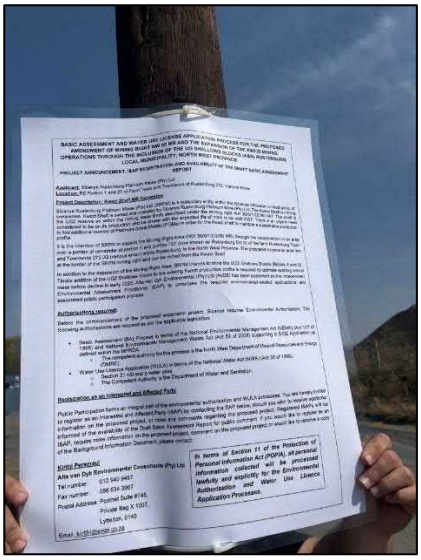
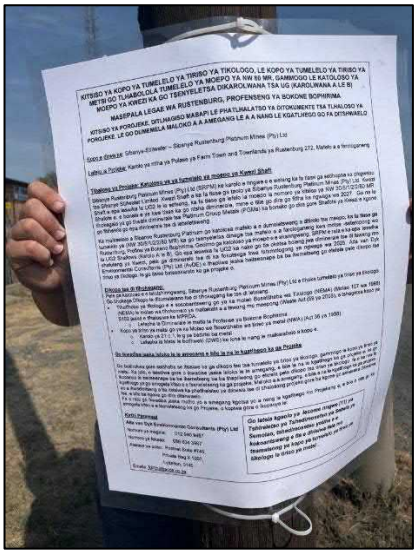


Site Notice 8: Coordinates 25°37'55.37"S 27°13'28.91"E Outside of Talford Enterprises

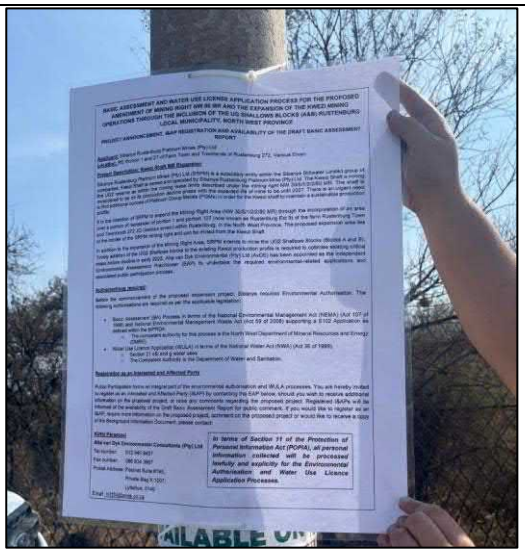


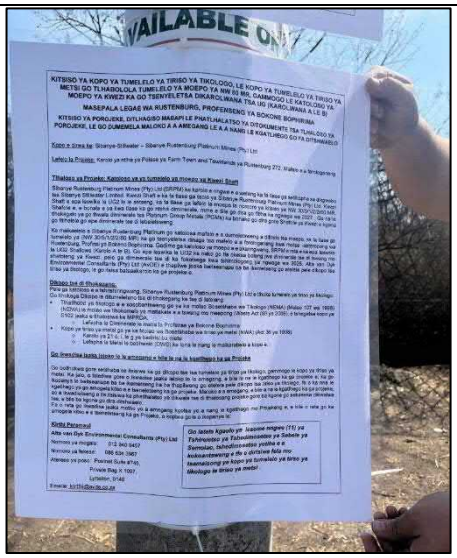




Site Notice 9: Coordinates 25°37'45.26"S 27°13'37.00"E Outside Rustenburg Galvanisers Factory	
	
	

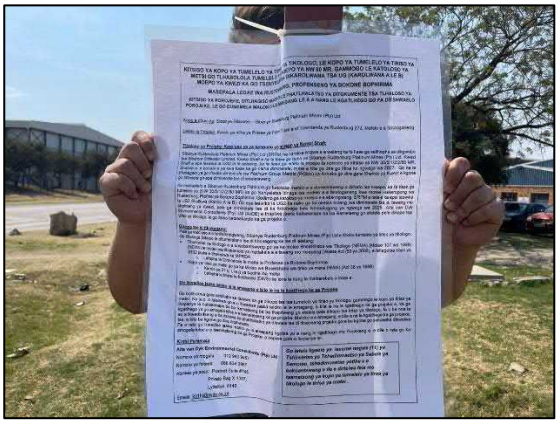
Site Notice 10: Coordinates 25°38'9.65"S 27°13'55.66"E Next to Bubbles Plastics	

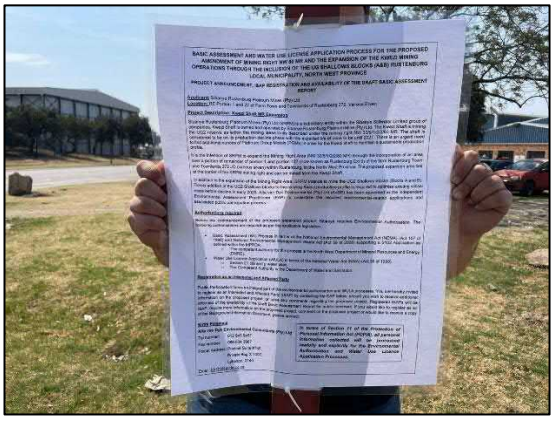






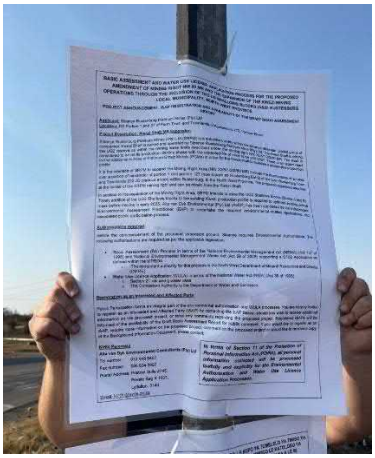
Site Notice 11Site : Coordinates 25°38'20.73"S 27°13'58.01"E Corner of Mangaan Street and Cobalt Street

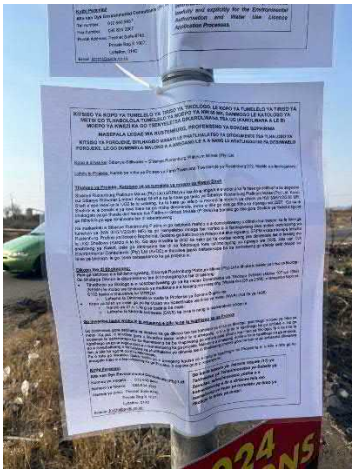




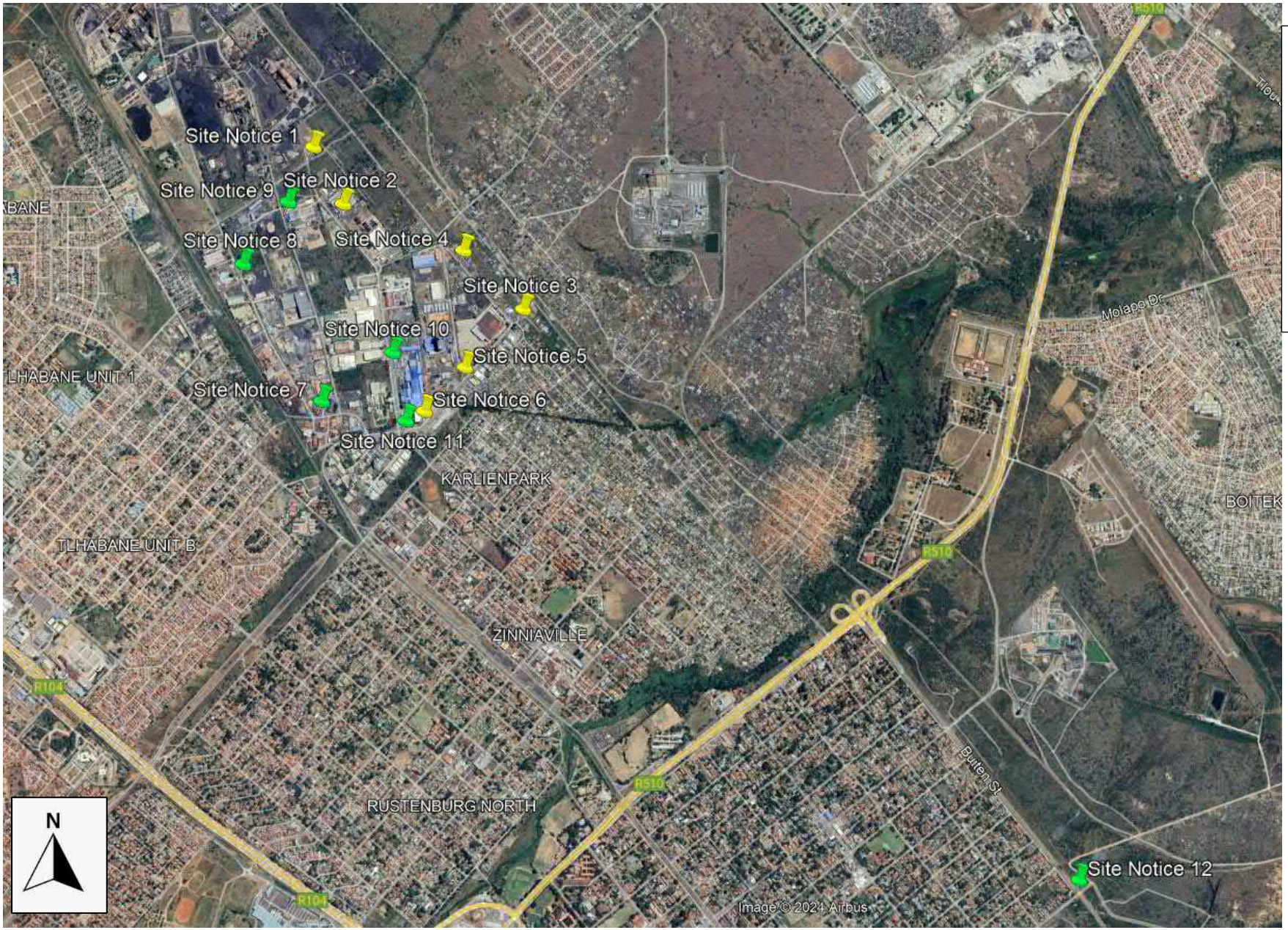


Site Notice 12: Coordinates 25°39'35.41"S 27°15'59.44"E Corner of Tuin Street and Buiten Street









Legend:

Notice placed on 03/09/2024

Notice placed on 12/09/2024

BACKGROUND INFORMATION DOCUMENT

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR
Section 102 DMRE Reference: NW-00383-MR/102

INTRODUCTION AND BACKGROUND

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mines (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2025. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft (**Figure 1**).

In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025.

Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) have been appointed as the Environmental Assessment Practitioner for the project to undertake the environmental related authorisations and associated public participation process.

PROJECT DESCRIPTION

This application supports the inclusion of an area (325.45 ha) into the Existing approved Mining Right with the intention to mine the UG2 Shallows blocks (A&B) in order to increase the production and life of mine for the Kwezi shaft (**Figure 1**).

No new surface infrastructure will be required as the existing shaft will be utilised to access the additional blocks. UG2 Shallows Blocks will be accessed via the existing underground mining area via the Kwezi Shaft decline. Mining activities in the UG2 Shallows Blocks are planned 40m below surface. All mining takes place on the reef horizon, and all the ore is transported to surface via an underground conveyor system. Ore will be hauled via existing surface rail network to the Kroondal Concentrators.

The UG2 Shallow blocks have experienced some significant environmental disturbances already. Block A has an area of 130 473 square meters. There are no building structures above Block A. Block B has area of 219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit.

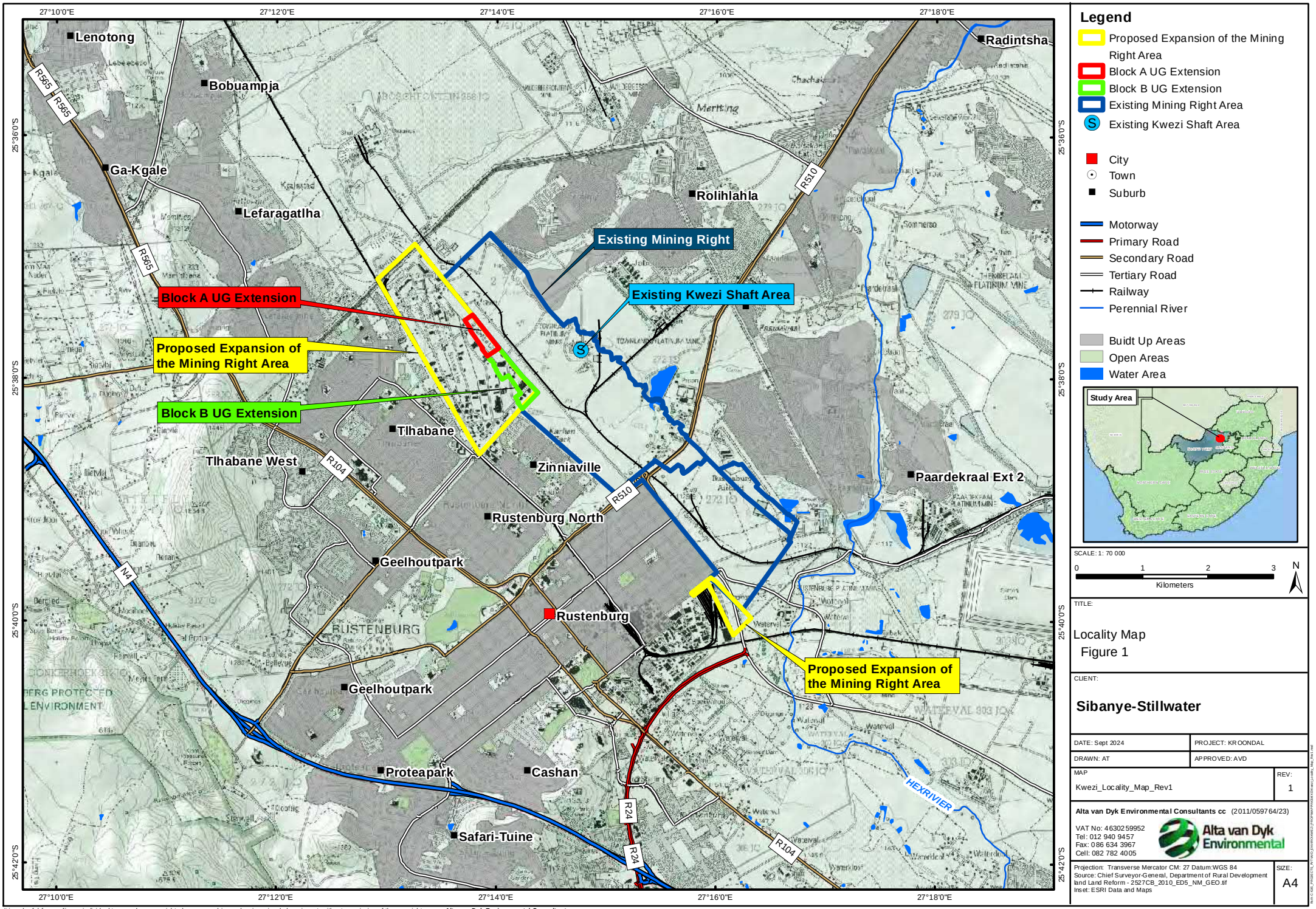
PURPOSE OF THIS DOCUMENT

The Public Participation Process (PPP) forms an integral part of any environmental authorisation process. This Background Information Document provides basic information regarding the proposed project and offers the reader an opportunity to obtain further information on the project so as to make informed comments, raise issues of concern and generally contribute positively towards the realisation of the project. The distribution of this document is a crucial step in advising the reader on how to become involved in the PPP. This document details the following:

- Project background and description.
- An overview of the environmental regulatory processes which will be undertaken in accordance with the South African legislation; and
- Provide details of the PPP and how Interested and Affected Parties (I&APs) can become involved.

LOCATION OF THE PROPOSED PROJECT

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ. The proposed expansion area is situated below on a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ over various erven (**Figure 2 & Figure 3**).



Legend

- Proposed Expansion of the Mining Right Area
- Block A UG Extension
- Block B UG Extension
- Existing Mining Right Area
- Existing Kwezi Shaft Area

- City
- Town
- Suburb

- Motorway
- Primary Road
- Secondary Road
- Tertiary Road
- Railway
- Perennial River

- Buidt Up Areas
- Open Areas
- Water Area

SCALE: 1: 70 000

0 1 2 3 Kilometers

N

TITLE:

Locality Map
Figure 1

CLIENT:

Sibanye-Stillwater

DATE: Sept 2024	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVD
MAP: Kwezi_Locality_Map_Rev1	REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

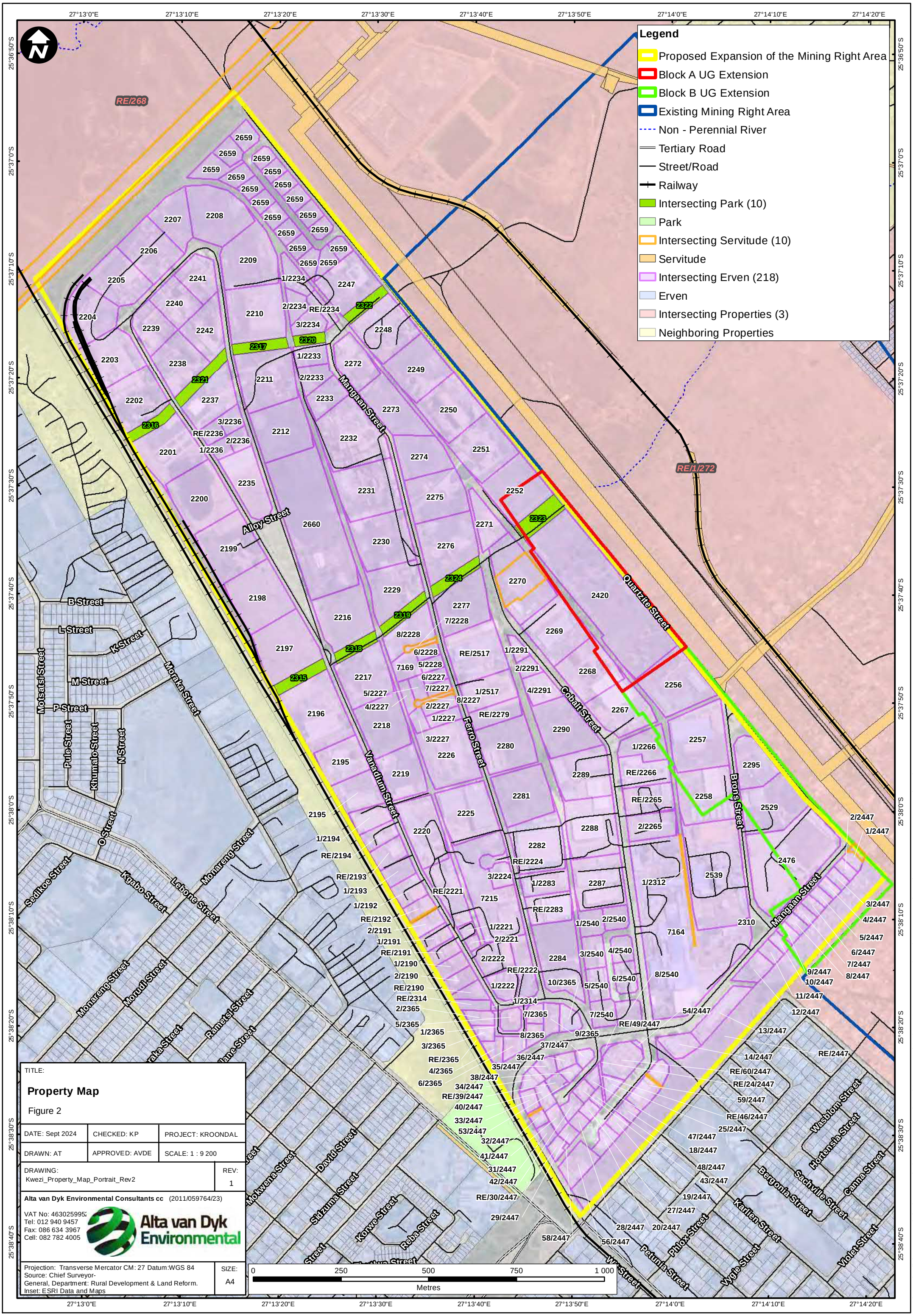
VAT No: 4630259952
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-General, Department of Rural Development land Land Reform - 2527CB_2010_ED5_NM_GEO.tif
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map

Figure 2

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 9 200

DRAWING: Kwezi_Property_Map_Portrait_Rev2 — REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

VAT No: 463025995
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

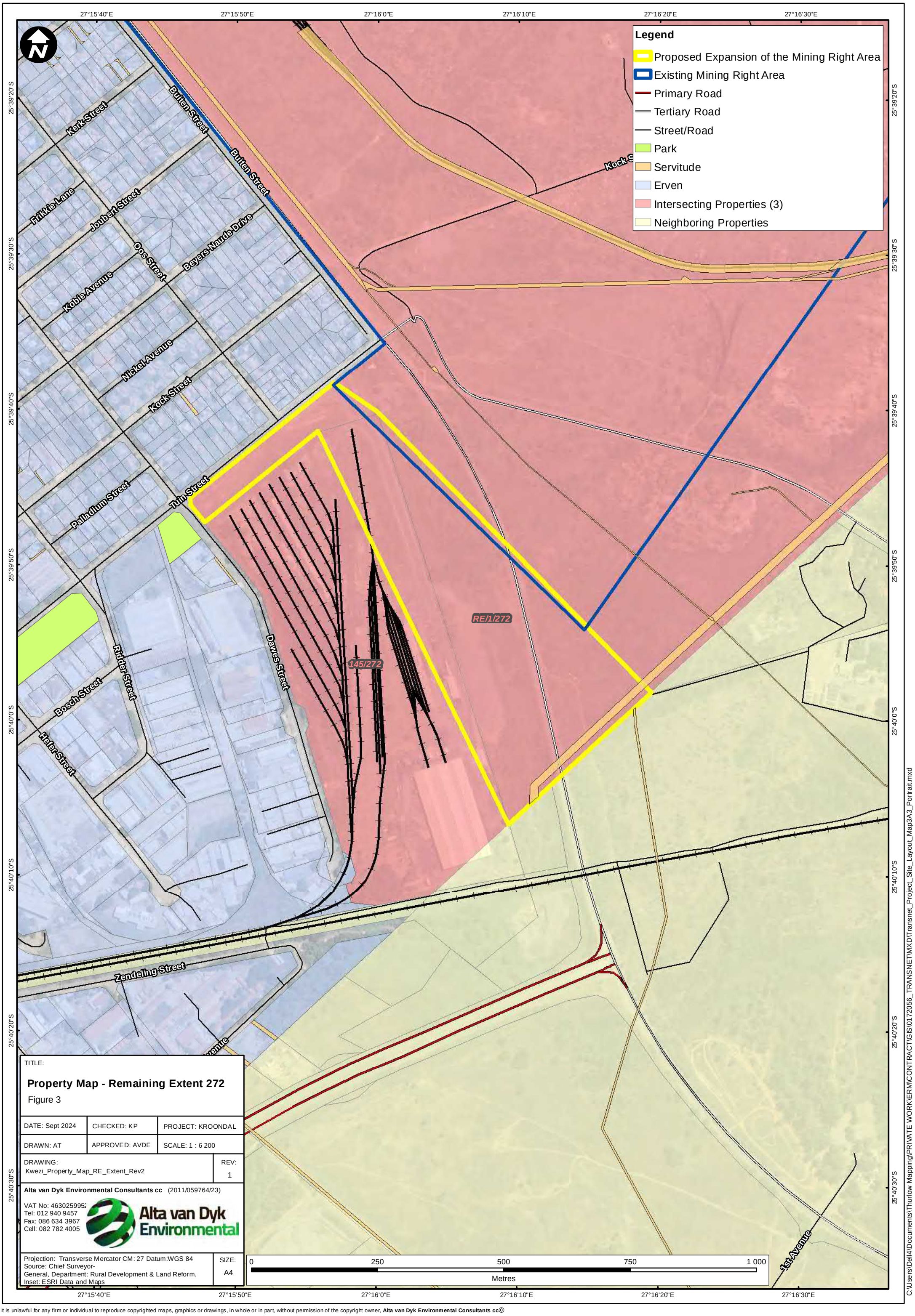
Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-
General, Department: Rural Development & Land Reform.
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map - Remaining Extent 272

Figure 3

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 6 200

DRAWING: Kwezi_Property_Map_RE_Extent_Rev2	REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

VAT No: 463025995
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Cell: 082 782 4005

Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84 Source: Chief Surveyor-General, Department: Rural Development & Land Reform. Inset: ESRI Data and Maps	SIZE: A4

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LEGISLATIVE REQUIREMENTS

The following legislative requirements are needed in support of this application.

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA. The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).
- Water Use Licence Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998). The Competent Authority is the Department of Water and Sanitation.

The environmental related authorisation processes require the involvement of stakeholders. The environmental authorisation process is illustrated in **Figure 3**.

During this environmental authorisation process the Draft Basic Assessment report will be made available or a period of 30 days and the Water Use Licence for period of 60 days. Once the comment period lapses all comments will be included within the Final Basic Assessment that will be submitted to the competent authority for decision-making.

LISTED ACTIVITIES

The listed activities triggered in terms of NEMA (Act 107 of 1998) is described in **Table 1**.

Table 1: National Environmental Management Act (ACT 107 of 1998)

NEMA Environmental Authorisation – Basic Assessment Process	
Listing Notice and Triggered Activity	**Project Activity Description**
Listing Notice 1 (GNR983) as amended	
Activity 21D - 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, required for such amendment.	This activity is triggered in support of the expansion of the existing Approved Mining Right Area.
Activity 34 - The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding-	Backfilling of the proposed UG2 Shallows Mining blocks A &B.

The listed activities triggered in terms of NEM: WA (Act 59 of 2008) is described in **Table 2**.

Table 2: National Environmental Management Waste Act (ACT 59 of 2008)

Applicable Listing Notice	Listed Activity	Listed Activity Description	Project Activity Description
GN921- 29 November 2013 (as amended)	Category A: Activity 13	The expansion of a waste management activity listed in Category A or B of this Schedule which does not trigger an additional waste management activity in terms of this Schedule.	This activity is triggered in support of the expansion Kwezi shaft mining areas (Blocks A &B), specifically relating to the waste rock that will result from the mining activities. The waste rock will not be brought to surface and will be packed underground

The Water Uses triggered is described in Table 3.

Table 3: National Water Act (Act 107 of 1998)

National Water Act – Water Use Licence	
Water Use triggered	**Project Activity Description**
Section 21(g) – disposing of waste in a manner which may detrimentally impact on a water resource.	Backfilling of the proposed mining blocks A &B.
Section 21(c) and (i) – Impeding or diverting the water within a water course and/or altering the beds, banks, course or characteristics of a water course.	Underground Mining Activities within 500m from a Channelled Valley Bottom Wetland

ENVIRONMENTAL AUTHORISATION PROCESS

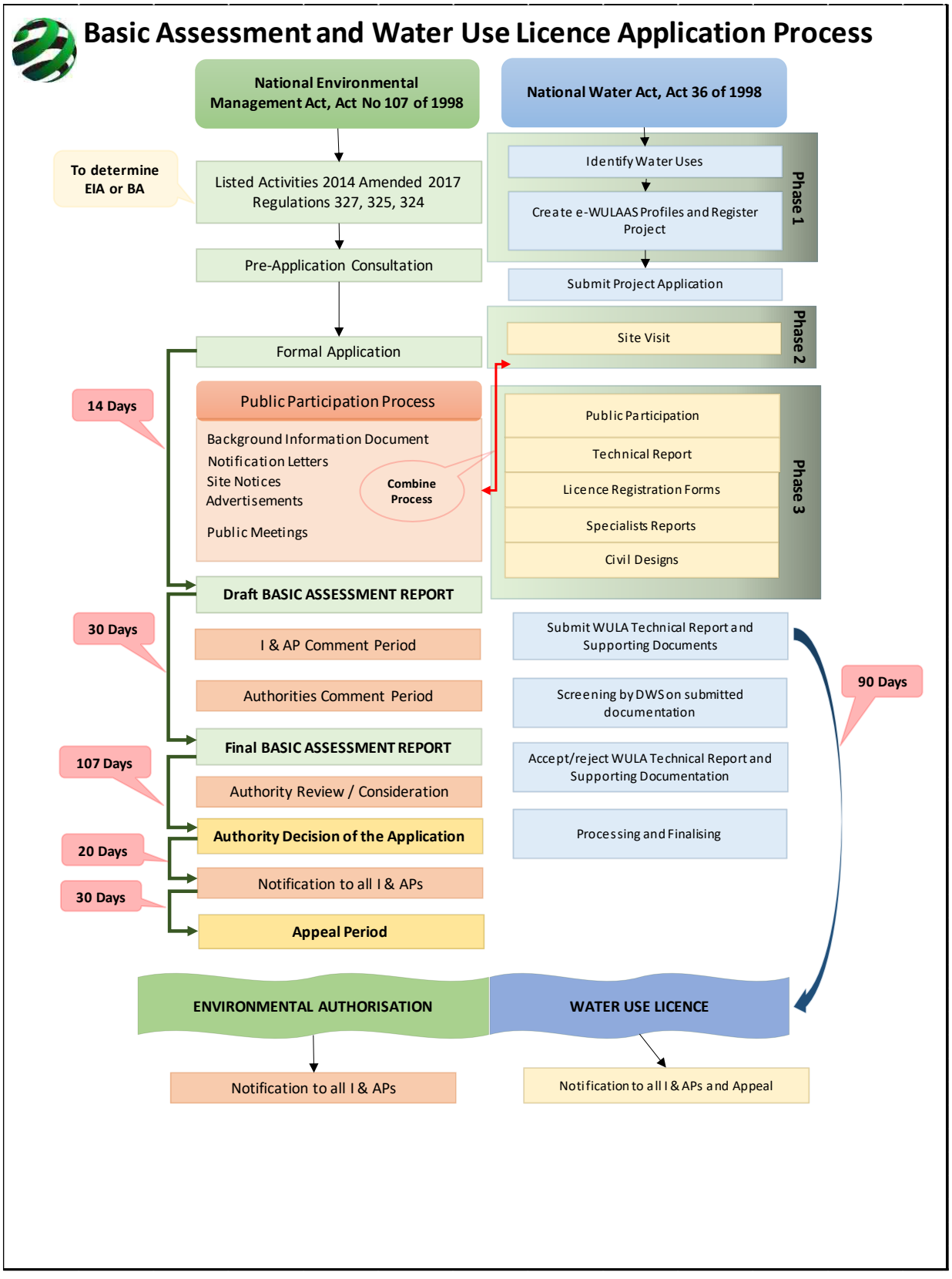


Figure 3: The Basic Assessment Reporting process

YOUR COMMENT IS IMPORTANT

Your comments and suggestions on any aspect of the proposed project, including the technical and stakeholder engagement processes, will ultimately assist the authorities in their decision-making process. If you wish to receive further notifications and documentation regarding the proposed Kwezi shaft mining right expansion project and EMPr amendment, kindly complete the attached registration form, and send to Kirthi Peramaul of Alta van Dyk Environmental Consultants.

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967
Postal address: Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:

Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title		**First name**	
Initials		**Surname**	
Organisation			
Postal address			
		Postal code	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Alta van Dyk Environmental
"…for the silent ones…"

Postnet Suite #745
Private Bag X1007
Lyttleton
1040

Tel: 012 940 9457
Cell: 076 314 3604
Fax: 086 634 3967
reata@avde.co.za

30 September 2024

Dear Stakeholder

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

INTRODUCTION AND BACKGROUND

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile. This is as a result of the depressed global market for Platinum Group Metals in conjunction with the decline in production of the shafts.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft (Figure 1). In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025.

Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) have been appointed as the Environmental Assessment Practitioner for the projects to undertake the environmental related authorisations and associated public participation process.

PROJECT DESCRIPTION

This application supports the inclusion of an area (325.45 ha) into the Existing approved Mining Right with the intention to mine the UG2 Shallows blocks (A&B) in order to increase the production and life of mine for the Kwezi shaft (**Figure 1**).

No new surface infrastructure will be required as the existing shaft will be utilised to access the additional blocks. UG2 Shallows Blocks will be accessed via the existing underground mining area via the Kwezi Shaft decline. Mining activities in the UG2 Shallows Blocks are planned 40m below surface. All mining takes place on the reef horizon, and all the ore is transported to surface via an underground conveyor system. Ore will be hauled via existing surface rail network to the Kroondal Concentrators.

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD, a subsidiary of ALTA VAN DYK CORPORATE GROUP
Registration Number: 2011/059764/23/Vat No: 4630259952

Postnet Suite #745
Private Bag X1007
Lyttleton
1040

Tel: 012 940 9457
Cell: 076 314 3604
Fax: 086 634 3967
reata@avde.co.za

The UG2 Shallow blocks have experienced some significant environmental disturbances already. Block A has an area of 130 473 square meters. There are no building structures above Block A. Block B has area of 219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit.

Location

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ. The proposed expansion area is situated below on a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ over various erven (**Figure 2 & Figure 3**).

AUTHORISATIONS REQUIRED

The following authorisations are required per the applicable legislation:

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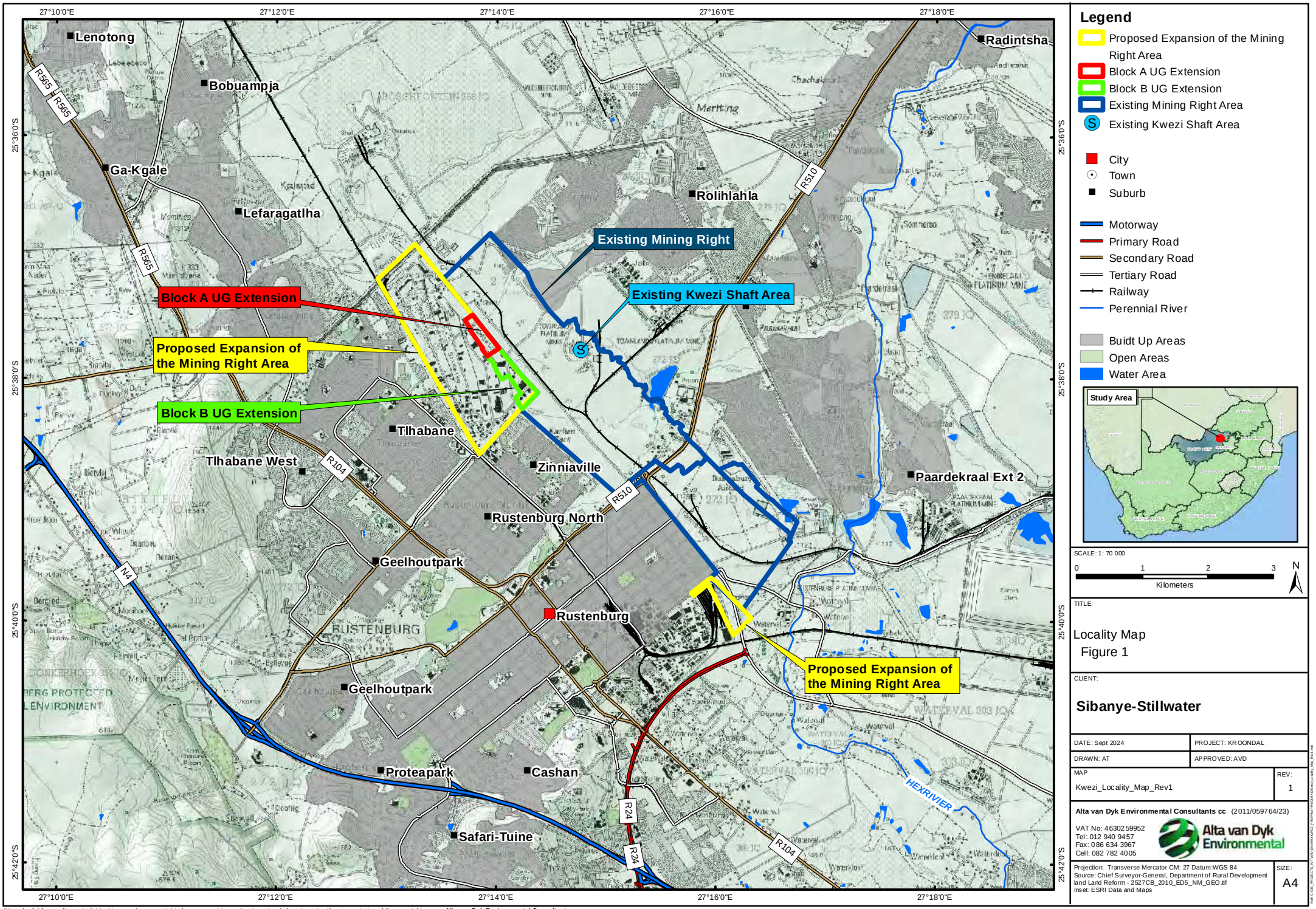
AVALIBILITY OF THE DRAFT BASIC ASSESSMENT REPORT

The Draft Basic Assessment report will be made available for public comment for a period of 30 days. Registered Interested and Affected Parties will be informed on the availability of the document for review and comment.

If you would like more information on the proposed project, or comment on the proposed project, please direct all enquires to Kirthi Peramaul.

Kind regards,

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457
Fax number: 086 634 3967
Postal Address: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za



Legend

- Proposed Expansion of the Mining Right Area
- Block A UG Extension
- Block B UG Extension
- Existing Mining Right Area
- Existing Kwezi Shaft Area

- City
- Town
- Suburb

- Motorway
- Primary Road
- Secondary Road
- Tertiary Road
- Railway
- Perennial River

- Buidt Up Areas
- Open Areas
- Water Area

SCALE: 1: 70 000

0 1 2 3 Kilometers

N

TITLE:

Locality Map
Figure 1

CLIENT:

Sibanye-Stillwater

DATE: Sept 2024	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVD
MAP: Kwezi_Locality_Map_Rev1	REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

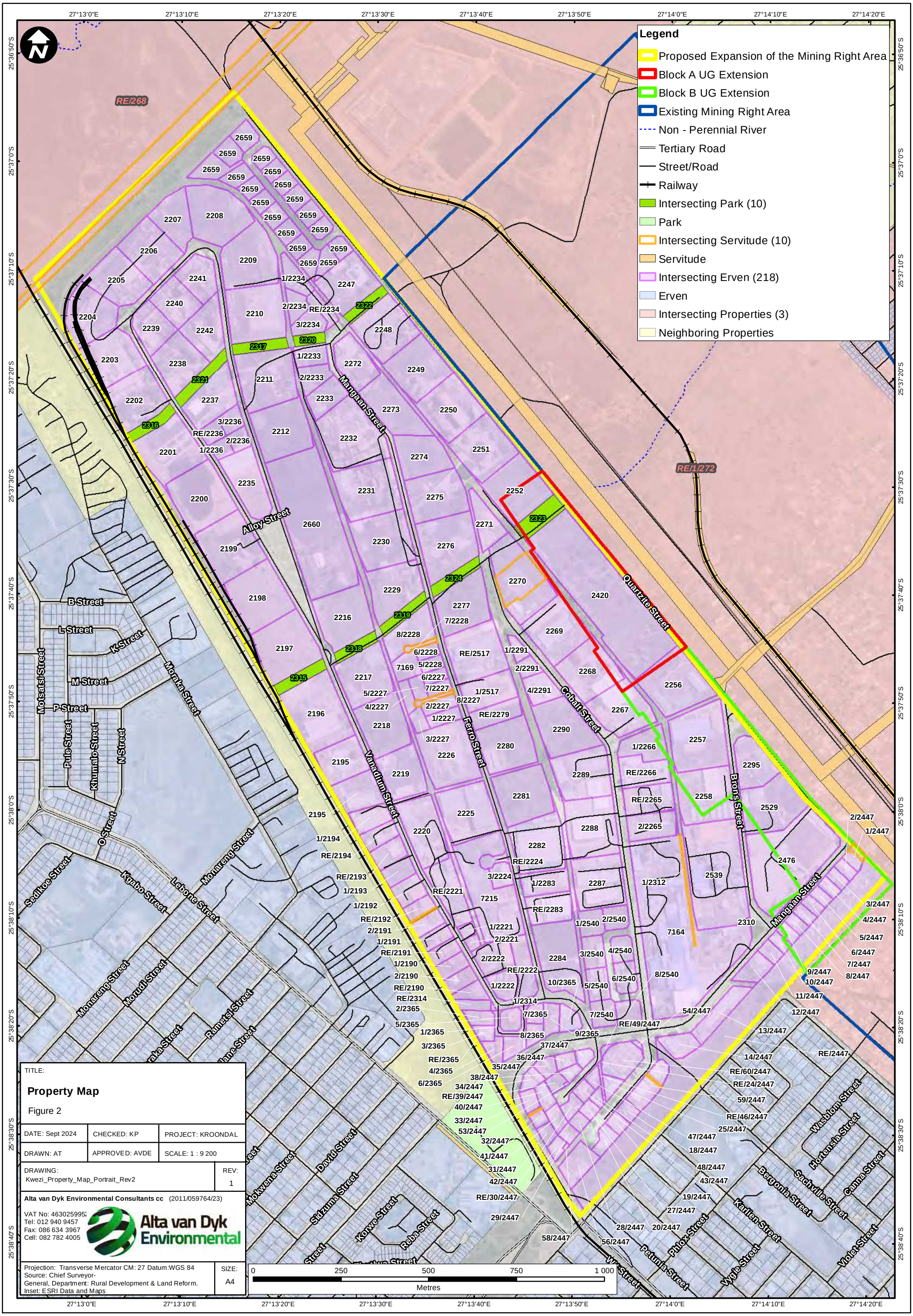
VAT No: 4630259952
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-General, Department of Rural Development land Land Reform - 2527CB_2010_ED5_NM_GEO.tif
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map

Figure 2

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 9 200

DRAWING: Kwezi_Property_Map_Portrait_Rev2 — REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

VAT No: 463025995
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

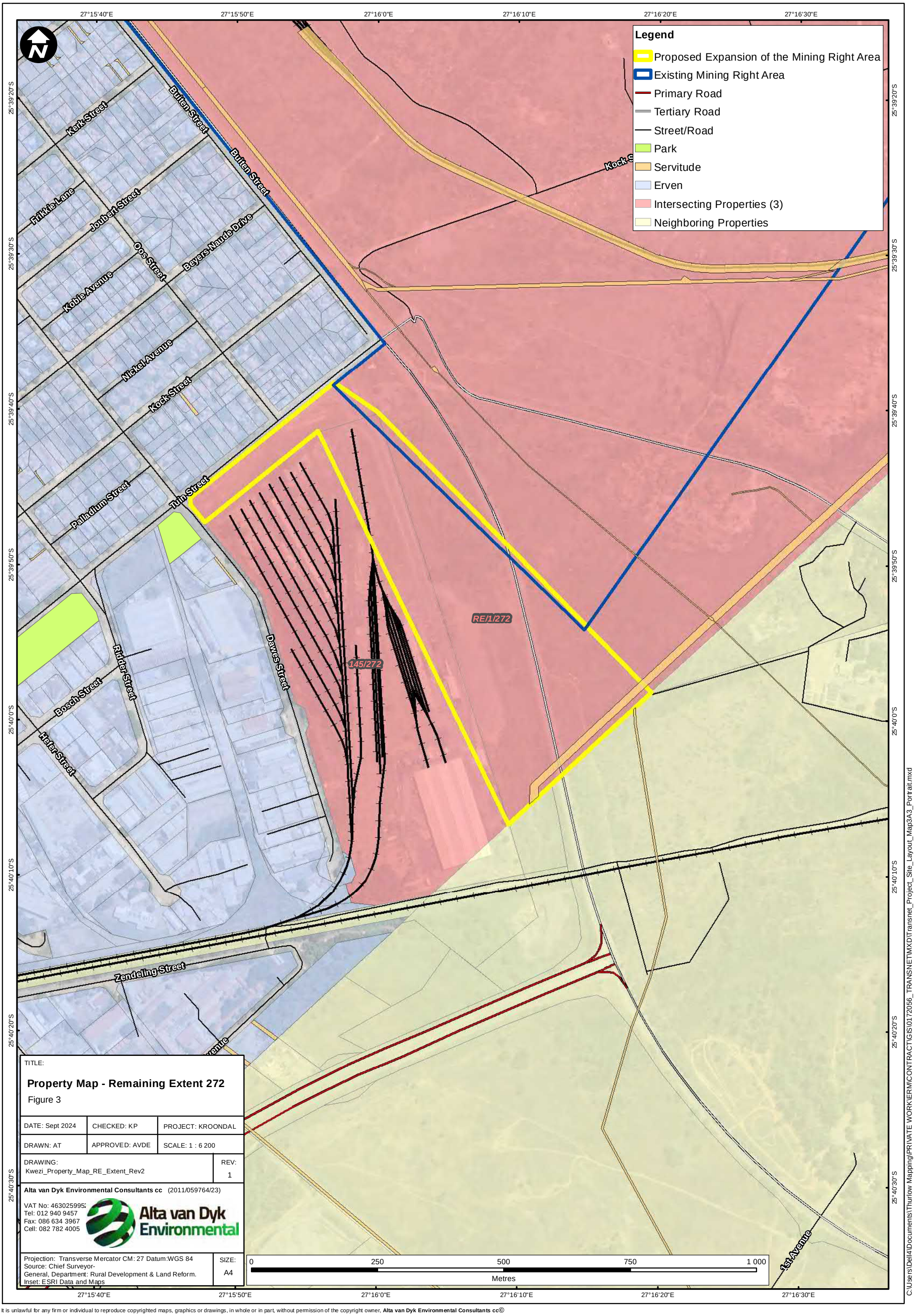
Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-
General, Department: Rural Development & Land Reform.
Inset: ESRI Data and Maps

SIZE: A4

C:\Users\Dell4\Documents\Thurlow Mapping\PRIVATE WORK\ERMCONTRACT\GIS\0172056_TRANSNETMXD\Transnet_Project_Site_Layout_Map3A3_Portrait.mxd

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TITLE:

Property Map - Remaining Extent 272

Figure 3

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 6 200

DRAWING: Kwezi_Property_Map_RE_Extent_Rev2	REV: 1

Alta van Dyk Environmental Consultants cc (2011/059764/23)

VAT No: 463025995
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84 Source: Chief Surveyor-General, Department: Rural Development & Land Reform. Inset: ESRI Data and Maps	SIZE: A4

C:\Users\Dell4\Documents\Thurlow Mapping\PRIVATE WORK\ERM\CONTRACT\GIS\0172056_TRANSNET\MXD\Transnet_Project_Site_Layout_Map3A3_Portrait.mxd

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Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:25
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Notification Letter Rustenburg SandBlasting.pdf; Kwezi, MRE - EMPr -BID 02.09.24.pdf

Dear Rustenburg Sandblasting and North West Granite Slabs

Attention: Wikus

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 1 of erf 2447 of Town and townlands of Rustenburg Farm 272 & Portion 2 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:28
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Uptown Trading.pdf

Dear Uptown Trading

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Portion 3 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
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Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:30
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Are Ananeng.pdf

Dear Are Ananeng Construction Pty Ltd

Attention: Lorraine

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Portion 6 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

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Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:32
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Sons & Joseph Motor Repairs.pdf

Dear Sons and Joseph Motor Repairs

Attention: Joseph & Ntefo Mogale

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Portion 7 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:33
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Kamogelo.pdf

Dear Kamogelo Industrial & mining supplies

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 8 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:35
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Board City Rustenburg.pdf

Dear Board City Rustenburg

Attention: S Sheik

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 9 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

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Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:38
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Afri Ready Mix.pdf

Dear Afri Ready Mix (Pty) Ltd

Attention: Gerhard Maree

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2266 Town and townlands of Rustenburg Farm 272 and Portion 1 of erf 2266 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

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Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:41
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter SA Breweries.pdf

Dear South African Breweries

Attention: Nomsa Sangweni

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2267 Town and townlands of Rustenburg Farm 272 and Portion 0 of erf 2268 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:45
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Glencore.pdf

Dear Glencore Operations

Attention: Naudene

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2420 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:46
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter NW Recycling.pdf

Dear North West Recycling Services

Attention: Peter

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2256 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
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Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:49
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Rustenburg Steel Construction.pdf

Dear Rustenburg Steel Construction

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2257 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
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Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 07:51
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Coca Cola.pdf

Dear Coca-Cola Beverages South Africa Pty Ltd

Dear Vicky

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2476 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Kind Regards

Kirthi Peramaul

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Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 11:09
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter SA Breweries.pdf

Dear South African Breweries

Attention: Nomsa Sangweni

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2267 Town and townlands of Rustenburg Farm 272 and Portion 0 of erf 2268 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

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Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 11:11
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Kamogelo.pdf

Dear Kamogelo Industrial & mining supplies

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 8 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 11:19
To:
Subject: RE: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area

Tracking:

Recipient	Read
'sales2@kamsupply.co.za'	
Tebogo	Read: 2024/09/05 11:43

Dear Kamogelo Industrial & mining supplies

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 8 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

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Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 11:59
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf

Dear Carol

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 5 of erf 2447 Town and townlands of Rustenburg Farm 272

Thank you for taking my call this morning. Kindly find attached a Background Information document for the proposed project.

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

Please if possible can you share the contact details of the Landowner or pass on this information to the landowner.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 12:09
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Wetzlar.pdf

Dear Wetzlar prop Pty Ltd

Attention: Phillip Wetzlar

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 10 of erf 2447 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 05 September 2024 12:20
To:
Subject: Sibanye RPM Proposed Expansion of the Kwezi Underground Mine Area
Attachments: Kwezi, MRE - EMPr -BID 02.09.24.pdf; Notification Letter Waterflex.pdf

Dear Waterflex Pty Ltd

Attention: Henry

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

RE: Portion 0 of erf 2258 Town and townlands of Rustenburg Farm 272

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B).

You have been identified as the surface owner of the above-mentioned properties. Attached to this email is a notification letter and a Background Information Document which provides details of the proposed underground mine expansion.

Should you not be the correct contact person, kindly share the contact details and email address of the relevant contact. Please contact the undesigned should you require any further information.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

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Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 16 September 2024 14:11
To: 'Kirthi Peramaul'
Subject: Sibanye RPM Proposed Expansion of the Mining Right Area and Kwezi Underground Mine Area
Attachments: Kwezi MRE -Final.pdf

Tracking:

Recipient	Read
'Kirthi Peramaul'	

Read: 2024/09/16 14:12

Read: 2024/09/16 14:19

Read: 2024/09/18 08:44

Dear Stakeholder,

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B).

You were previously provided with a Notification letter and a Background Information Document. Kindly note that there has been a change in the study area. Kindly find attached an updated Background Information Document which provides details of the area to be included in the Mining Right as well as the proposed mining blocks (Block A & B).

Kindly contact the undersigned should you require any further information on the proposed project.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

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Alta van Dyk Environmental

"……..for the silent ones…."

Project Management, Peer Review, Advisory

Knock and Drop Register

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS

Date: 03 September 2024

FULL NAME	ORGANISATION	TELEPHONE	CELL NO	E-MAIL	SIGNATURE
A Muller	Steel Trading				
J. HENDRIKZ	CRANE CONTRACTOR				
Nomsa Sanguni	SAB				
Francisca DAVIDS	SAB				
GERHARD MARE	ARI				
JAMES JOE.					
S. SHAIKH	BOARD CITY.				
Mashele Douglas	Kamogelo				
Ntefo Mogale	SE J. Motors				
Lorraine Masoko	Ale Ananeng				

Vikki Rodgers

FULL NAME	ORGANISATION	TELEPHONE	CELL NO	E-MAIL	SIGNATURE
Cobi Pretorius	SAMY SA				
Ruby Karani	uptown trading				
Wikus Pretorius	Granil				
KUTLWANO MOLEFE	SMEC				
ELANIE CAMPBELL	RUSTENBURG STEEL CONSTRUCTION				
WILLEM Du Toit	NW Recycling				
Zone 6	community				
Segonatso Mocketsi					

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Alta van Dyk Environmental

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Project Management, Peer Review, Advisory, Education

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12 Sep 2024

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
~~JONATHAN DROUGH~~ ASPA	Eskom				
Rene					
Wian van Tonder	A&R				
Ivan TV Centre Rustenburg.	Ramcin				
Rodney (Gecko Plastics).					
Jacques / Walter.					
Allied cranes.					
Jeanette Ngwane.					
Sidney					
	Galnorth drilling				

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Project Management, Peer Review, Advisory, Education

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY. NORTH WEST PROVINCE

Date: 12/09/2024

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
NELSON MONTSHO	ZERO 12				
MOHAMMED ADAM					
LUCAS MAKGOPA	MAKK Engineering Projects				
W. V. Rensburg	Hanover Venice				
M. Lewis	ACTOM				
Dave Mantle	Buleds9				
YUSUF WADE	AHK Motor Sales				
Mamun	Islam Supermarket				
islam	islam H.C.D				
JAJJH	S.S. Recycling				

Shops.

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
S.J. van der Merwe	ALTOMAX				
M. Imbert	Allied				
Chantelle Pothier	RPM Plastics				
Sinisa Magwaza	Betshegi Projects				
OTSHEPENG LETSHOLO	ONETIME				
SHANE	ASSE				

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Project Management, Peer Review, Advisory, Education

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
Zakariya	MMALET				
	Stella Vlei's				
Chenea	Copart purple sk				
	Alu Con				
Andre Cussons					
Waterfall tombstones					
J.G Fossaw	Steel & Pipes				
Heseap	Mafisa Steel works				
	Rustenburg Engineering foundary				

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
Kenneth Montsho	Charora Enterprise				
Jacky vd Bank	Euro Sales				
Grailly Fisher	Bakamosa				
Simon Mokoena	Albany				
Johnny Mathew	AWJ				
mauritius claase	CEM BLOCKS				
Rosemary Kgonothi	RSC				
HGOBEMI VINCENT	Gensec Enterprise				
Dwayn Stewart	Intermine Agencies				
Evelyn Modise	Rustenburg Lo				

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Date: 12/09

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FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
Twané Schoombie					
Chané Kriel					
Kagiso Kalamore					
Bigman Matampela					
J.M. Bez					
L. Bock					
Shadley					
Eshmail					

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
	Albany Rust Tigerbrands DP				
	Wilson Minerals				
	Alromax				
	Rock Tool Services				
	Athen Chrome Mine				
	Allied Cr.				
	Rustenburg Steel Constructs				
	Rustenburg Steel Constr				
	CBC factories				
MR Bongani	VK chrome				
Mr Vuyosile					

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
	SGS				
Ms Xolani Ngubozabo	LA Gas				
	Vacant				
	Galaxy Bricks				
	Vacant				
	Bafotech				
	TD works Construct				
	TD works Constuct				
	Fair price Centre Distribution				
	Plaza board centre				

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
Blue Ribbon Depot					
D. Wild	Rock Tool Services				
DAVID MOAKA	OAKLAY				
SUPREME MUSHPUWA (manager)	GENSET EAST				
	CEMBLOCKS				
	AWT Solutions				
Martin Olivier	SGS				
	MTE METAL				
	VACANT				
	KIRK				

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
REGO	Khaya Engineering				
	Boshoek Spares				
Izelle	Waterfall Granite				
(Robus de Wintaar) Celia Vorster.	c/No. Hero & Vanadium Str.				
	Chalora				
	SS Engineering				
	Euro Hero Sales				
Gave BID + work.					
	Syon Plant Hire.				
	Twinpack				

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
	Bubble Plastic				
	Rainbo chicke				
TEBOGO	FAIR PRICE				

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BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
	SKF & Marthinusen				
David (Anglo)	Anglo American AAD Storage.				
Iron field. – Smelting	Not Smelting equipment				
Sangelo (security).	VACANT				
	Food forward SA				
	VACANT				
	RUST. GALV.				
	ARMATURE WINDERS				
	VACANT				
	MAHMOOD				

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Date: 12/09

FULL NAME	ORGANISATION	PROPERTY	CELL NO	E-MAIL	SIGNATURE
	Kumene Tech.				
	BFS Liftload KOMANE Fire				
	Balance Due 0794611550				
	Grab cycle				
Emmarentia Helmstedt	Plaza Board Ce				
Elroy Gordon	RICM				
MICHELLE BEZUIDENHOUT	RTB GAWANIZERS				
Norma Venter	Twin Pack				
Nathan Lebepe	Matthiesen & Conradie				

Alta van Dyk Environmental
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reata@avde.co.za

30 September 2024

Dear Stakeholder

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

INTRODUCTION AND BACKGROUND

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile. This is as a result of the depressed global market for Platinum Group Metals in conjunction with the decline in production of the shafts.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft (Figure 1). In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025.

Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) have been appointed as the Environmental Assessment Practitioner for the projects to undertake the environmental related authorisations and associated public participation process.

PROJECT DESCRIPTION

This application supports the inclusion of an area (325.45 ha) into the Existing approved Mining Right with the intention to mine the UG2 Shallows blocks (A&B) in order to increase the production and life of mine for the Kwezi shaft (**Figure 1**).

No new surface infrastructure will be required as the existing shaft will be utilised to access the additional blocks. UG2 Shallows Blocks will be accessed via the existing underground mining area via the Kwezi Shaft decline. Mining activities in the UG2 Shallows Blocks are planned 40m below surface. All mining takes place on the reef horizon, and all the ore is transported to surface via an underground conveyor system. Ore will be hauled via existing surface rail network to the Kroondal Concentrators.

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The UG2 Shallow blocks have experienced some significant environmental disturbances already. Block A has an area of 130 473 square meters. There are no building structures above Block A. Block B has area of 219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit.

Location

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ. The proposed expansion area is situated below on a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ over various erven (**Figure 2 & Figure 3**).

AUTHORISATIONS REQUIRED

The following authorisations are required per the applicable legislation:

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA. The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).
- Water Use Licence Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998). The Competent Authority is the Department of Water and Sanitation.

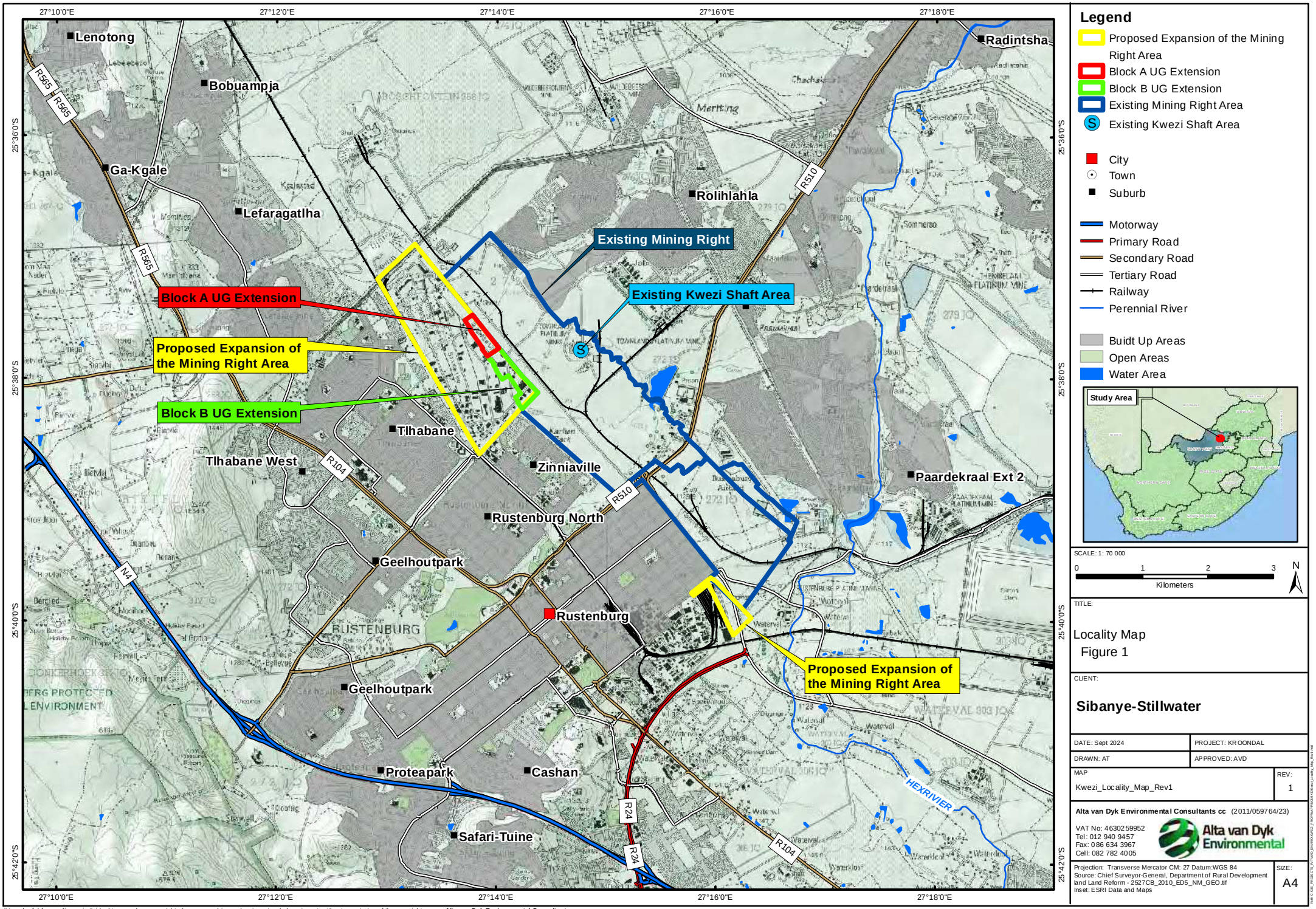
AVALIBILITY OF THE DRAFT BASIC ASSESSMENT REPORT

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If you would like more information on the proposed project, or comment on the proposed project, please direct all enquires to Kirthi Peramaul.

Kind regards,

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Legend

- Proposed Expansion of the Mining Right Area
- Block A UG Extension
- Block B UG Extension
- Existing Mining Right Area
- Existing Kwezi Shaft Area

- City
- Town
- Suburb

- Motorway
- Primary Road
- Secondary Road
- Tertiary Road
- Railway
- Perennial River

- Buidt Up Areas
- Open Areas
- Water Area

SCALE: 1: 70 000

0 1 2 3 Kilometers

N

TITLE:

Locality Map
Figure 1

CLIENT:

Sibanye-Stillwater

DATE: Sept 2024	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVD
MAP: Kwezi_Locality_Map_Rev1	REV: 1

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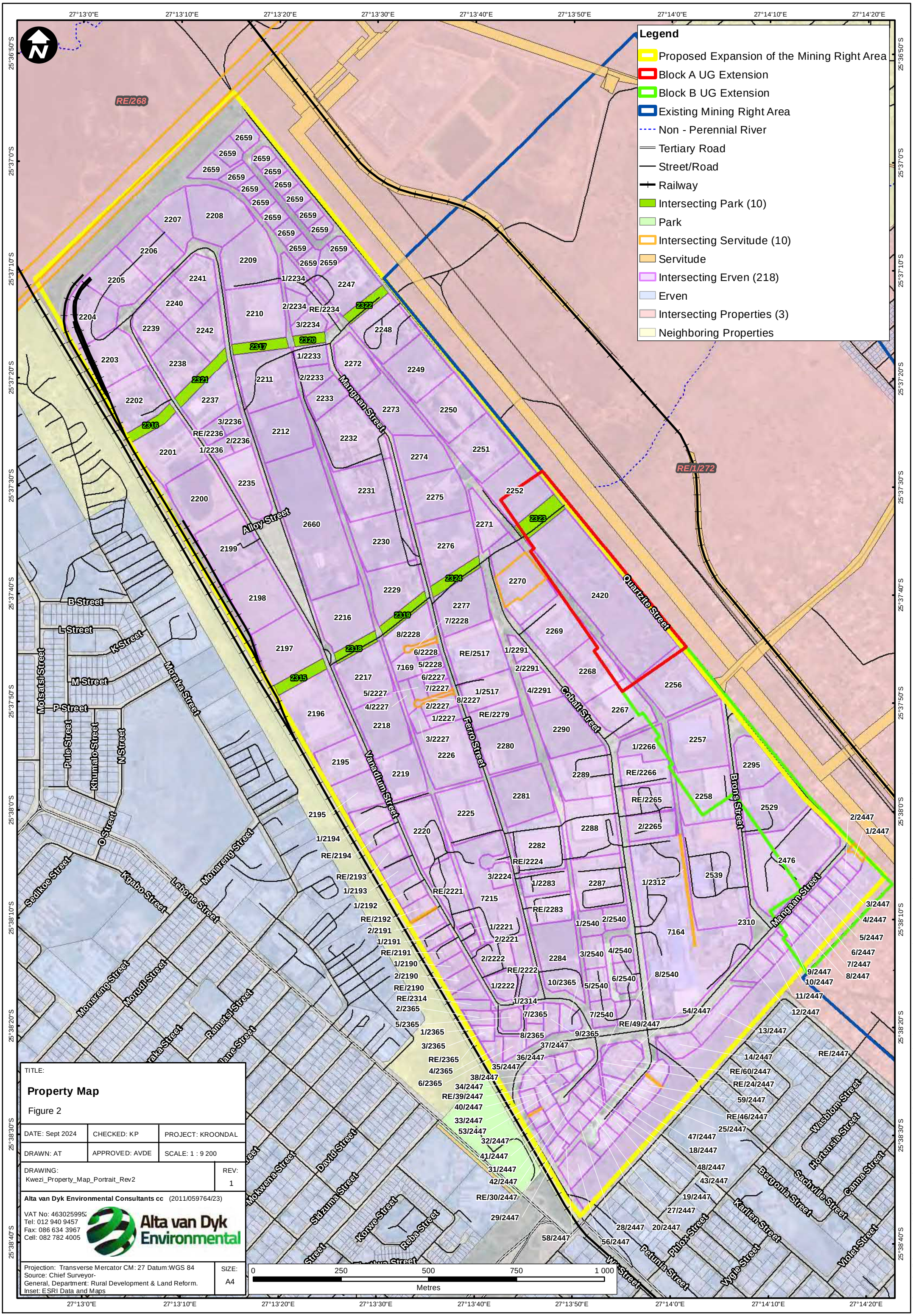
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Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-General, Department of Rural Development land Land Reform - 2527CB_2010_ED5_NM_GEO.tif
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map

Figure 2

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 9 200

DRAWING: Kwezi_Property_Map_Portrait_Rev2 — REV: 1

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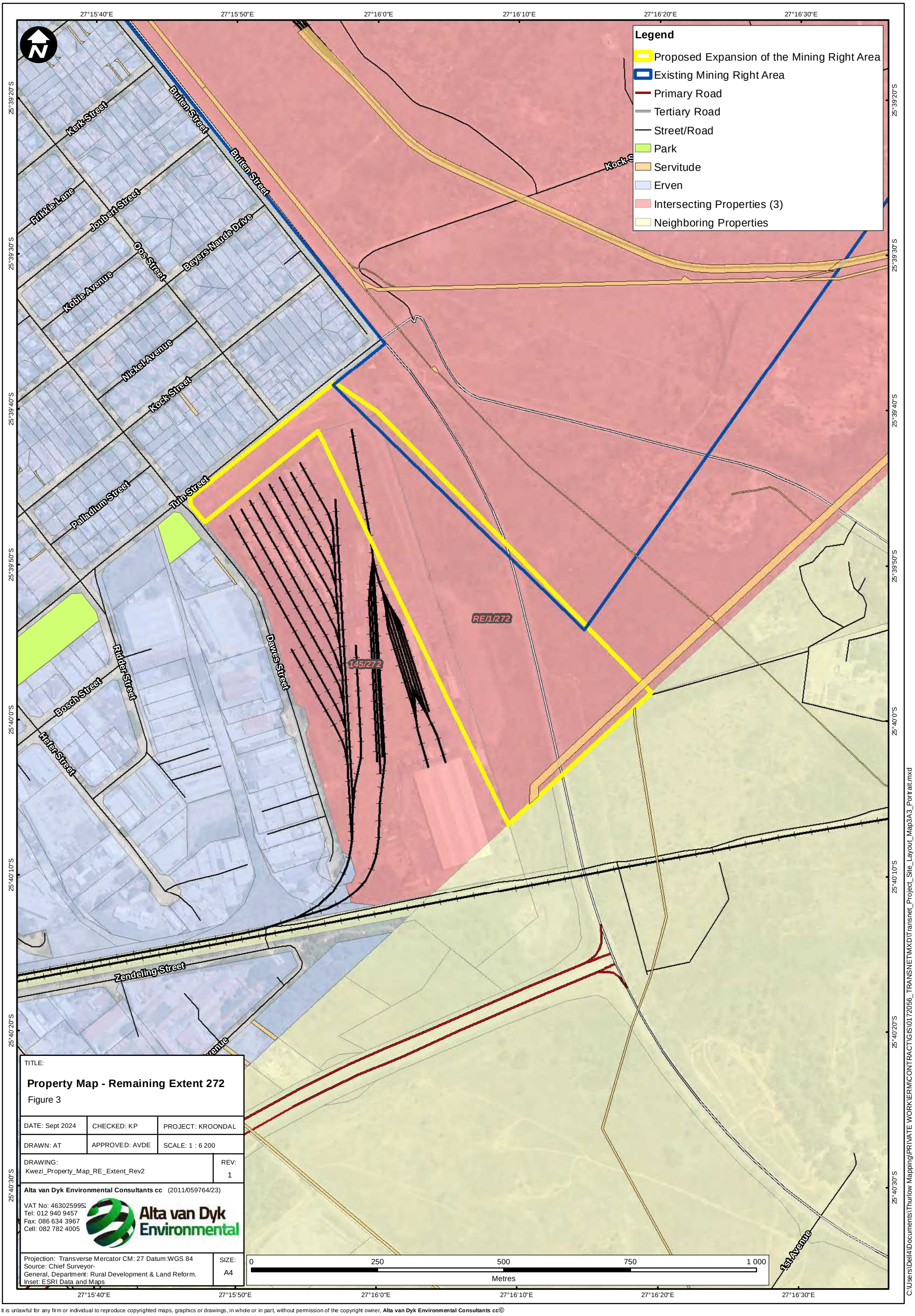
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Projection: Transverse Mercator CM: 27 Datum:WGS 84
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General, Department: Rural Development & Land Reform.
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map - Remaining Extent 272

Figure 3

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 6 200

DRAWING: Kwezi_Property_Map_RE_Extent_Rev2	REV: 1

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Projection: Transverse Mercator CM: 27 Datum:WGS 84 Source: Chief Surveyor-General, Department: Rural Development & Land Reform. Inset: ESRI Data and Maps	SIZE: A4

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09 September 2024

Dear Ragie Abdul Aziz
Saloojee Ahmed Yusuf
Ebrahim Muhammed
Ragie Mohammed

PO Box 50345, Zinniaville, 0302

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 4 of erf 2447

INTRODUCTION AND BACKGROUND

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile. This is as a result of the depressed global market for Platinum Group Metals in conjunction with the decline in production of the shafts.

It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025. At current spot prices, Kwezi shaft needs the UG2 Shallows blocks to maintain a sustainable ounce profile of 60 000 to 58 000 oz over life of mine. Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) have been appointed as the Environmental Assessment Practitioner for the projects to undertake the environmental related authorisations and associated public participation process.

Project Description

The UG2 shallow blocks (Block A and B) are situated outside of the existing mining right (NW 30/5/1/2/2/80 MR). This application supports the inclusion of the UG2 remaining blocks into the existing approved mining right, in order to increase the production and life of mine for the Kwezi shaft (**Figure 1**).

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The UG2 Shallow blocks have experienced some significant environmental disturbances already. Block A has an area of 130 473 square meters. There are no building structures above Block A. Block B has area of

219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit

Location

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ.

The potentially affected properties in terms of the proposed expansion of the underground mining areas is provided in **Table 1** and **Figure 2**.

Table 1: Potentially Affected Properties

Farm Name	**Block A and B** **Farm Name: Town and Townlands of Rustenburg 272JQ** • Portion 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of erf 2447 • Portion 0 of erf 2258 • Portion 0 of the erf 2266 • Portion 1 of the erf 2266 • Portion 0 of erf 2267 • Portion 0 of erf 2268 • Portion 0 of erf 2269 • Portion 0 of erf 2252 • Portion 0 of erf 2420 • Portion 0 of erf 2256 • Portion 0 of erf 2257 • Portion 0 of erf 2529 • Portion 0 of erf 2595 • Portion 0 of erf 2476 **Farm Name: Town and townlands of Rustenburg** • Portion 1 of Farm 272 JQ Figure 2 shows the location of these properties in relation to the project area.

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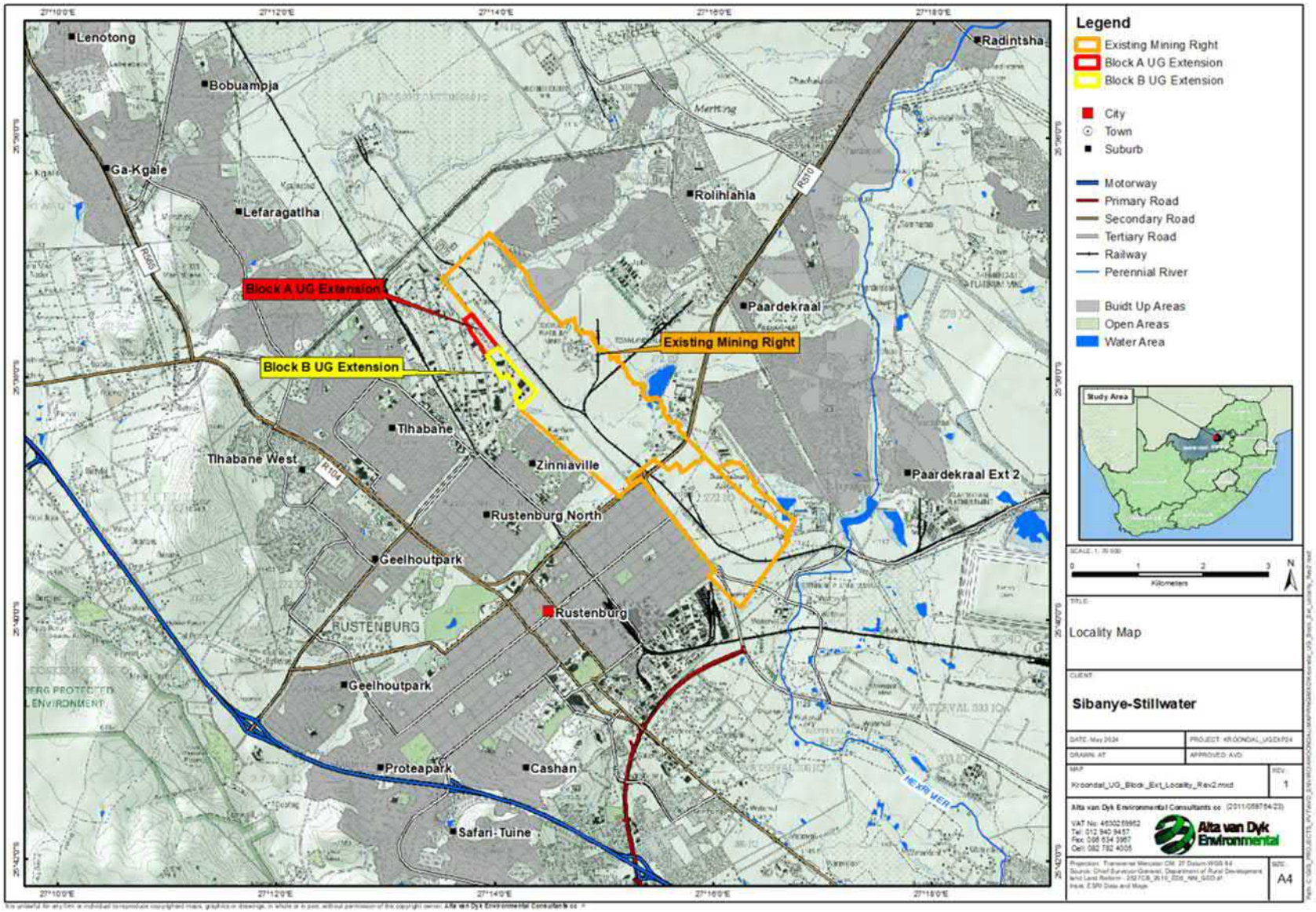


FIGURE 1: POTENTIALLY AFFECTED PROPERTIES

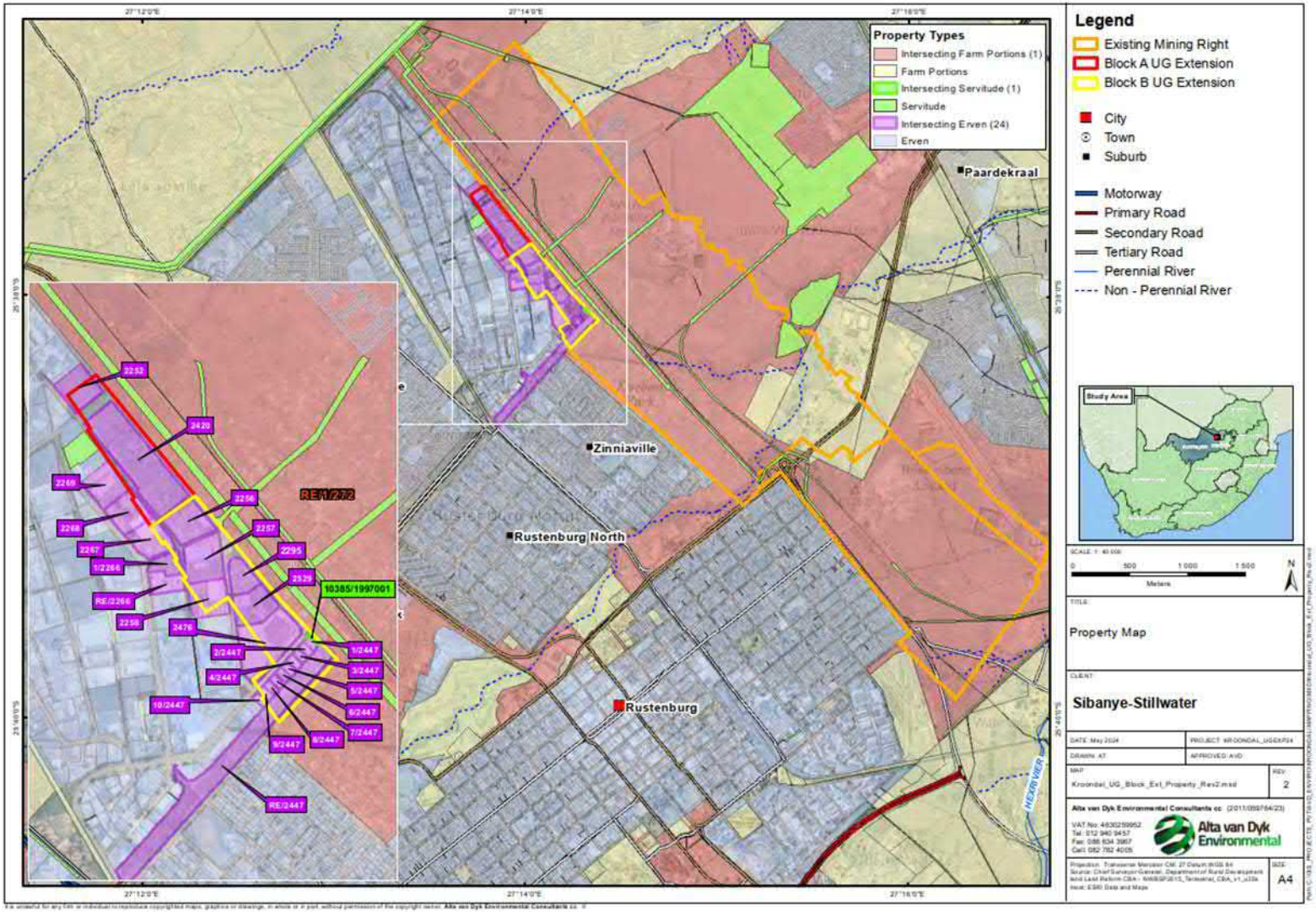


FIGURE 2: PROPERTY MAP

AVALIBILITY OF THE DRAFT BASIC ASSESSMENT REPORT

The Draft Basic Assessment report will be made available for public comment for a period of 30 days. Registered Interested and Affected Parties will be informed on the availability of the document for review and comment.

If you would like more information on the proposed project, or comment on the proposed project, please direct all enquires to Kirthi Peramaul.

Kind regards,

Kirthi Peramaul
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09 September 2024

Dear Ragie Abdul Aziz
Saloojee Ahmed Yusuf
Ebrahim Muhammed
Ragie Mohammed

17 Petunia Street Zinniaville, Rustenburg, North West, 0300

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 4 of erf 2447

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Project Description

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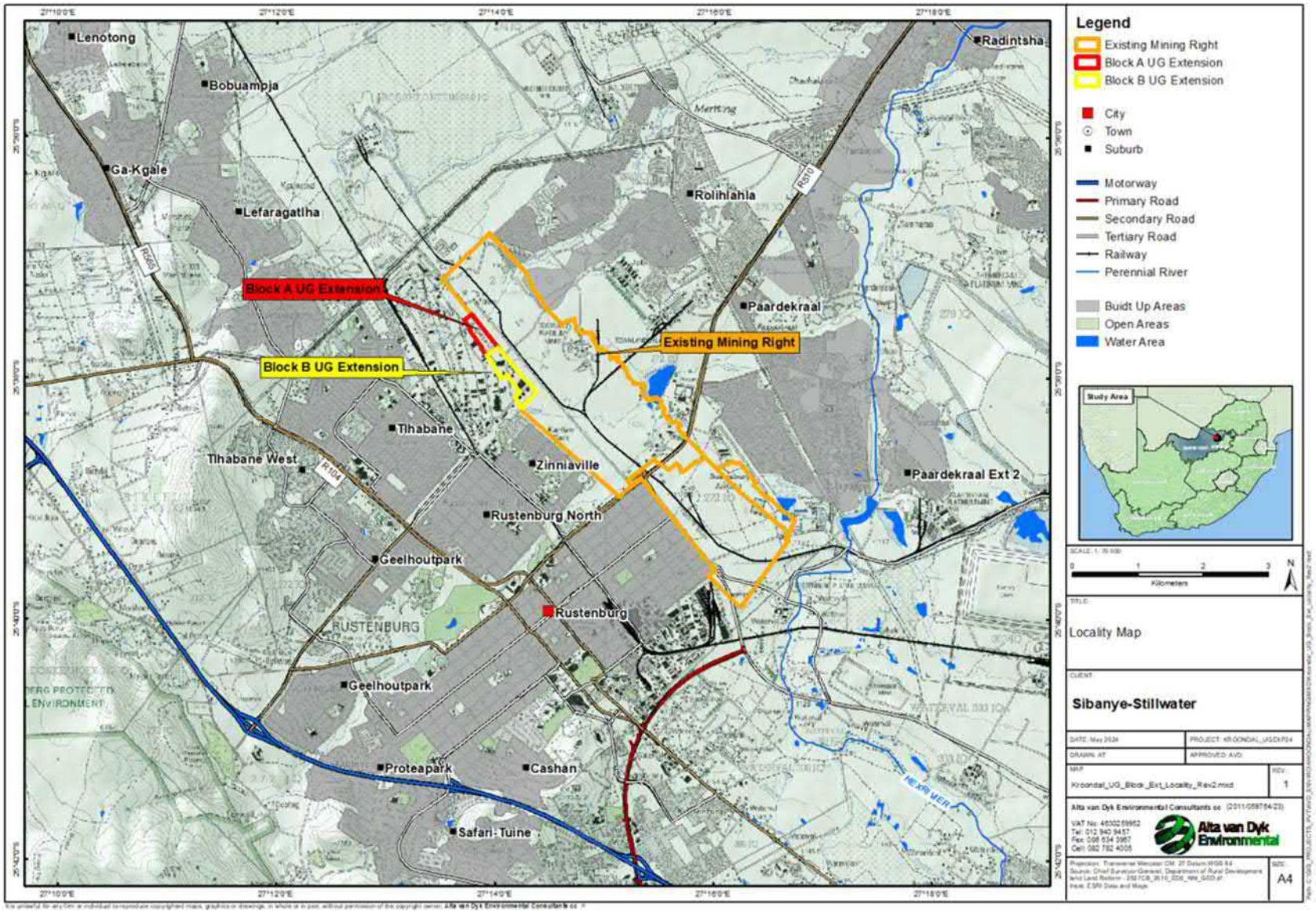


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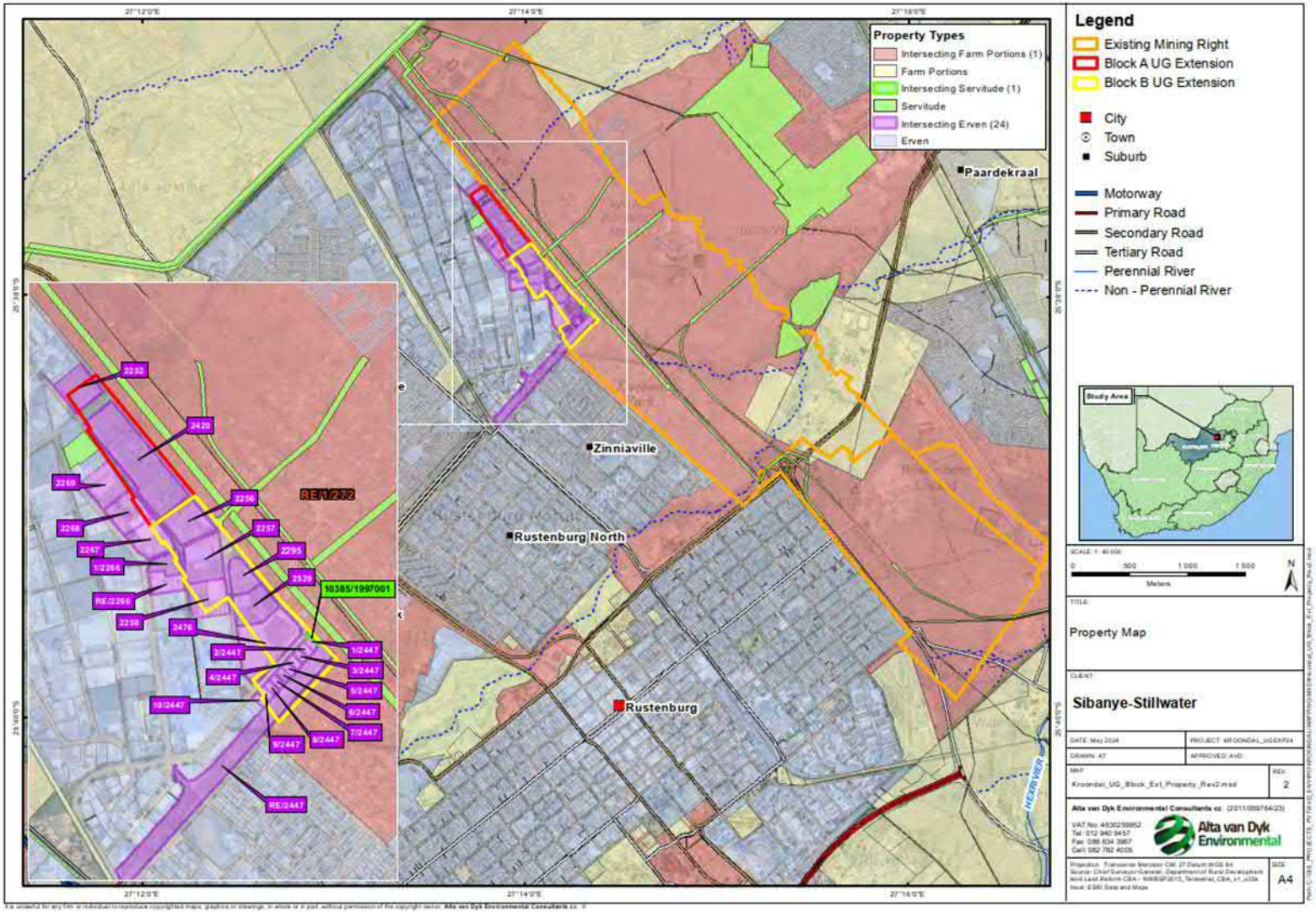


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09 September 2024

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DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 4 of erf 2447

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Farm Name	**Block A and B** **Farm Name: Town and Townlands of Rustenburg 272JQ** • Portion 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of erf 2447 • Portion 0 of erf 2258 • Portion 0 of the erf 2266 • Portion 1 of the erf 2266 • Portion 0 of erf 2267 • Portion 0 of erf 2268 • Portion 0 of erf 2269 • Portion 0 of erf 2252 • Portion 0 of erf 2420 • Portion 0 of erf 2256 • Portion 0 of erf 2257 • Portion 0 of erf 2529 • Portion 0 of erf 2595 • Portion 0 of erf 2476 **Farm Name: Town and townlands of Rustenburg** • Portion 1 of Farm 272 JQ Figure 2 shows the location of these properties in relation to the project area.

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD, a subsidiary of ALTA VAN DYK CORPORATE GROUP
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reata@avde.co.za

"…for the silent ones…"

AUTHORISATIONS REQUIRED

The following authorisations are required per the applicable legislation:

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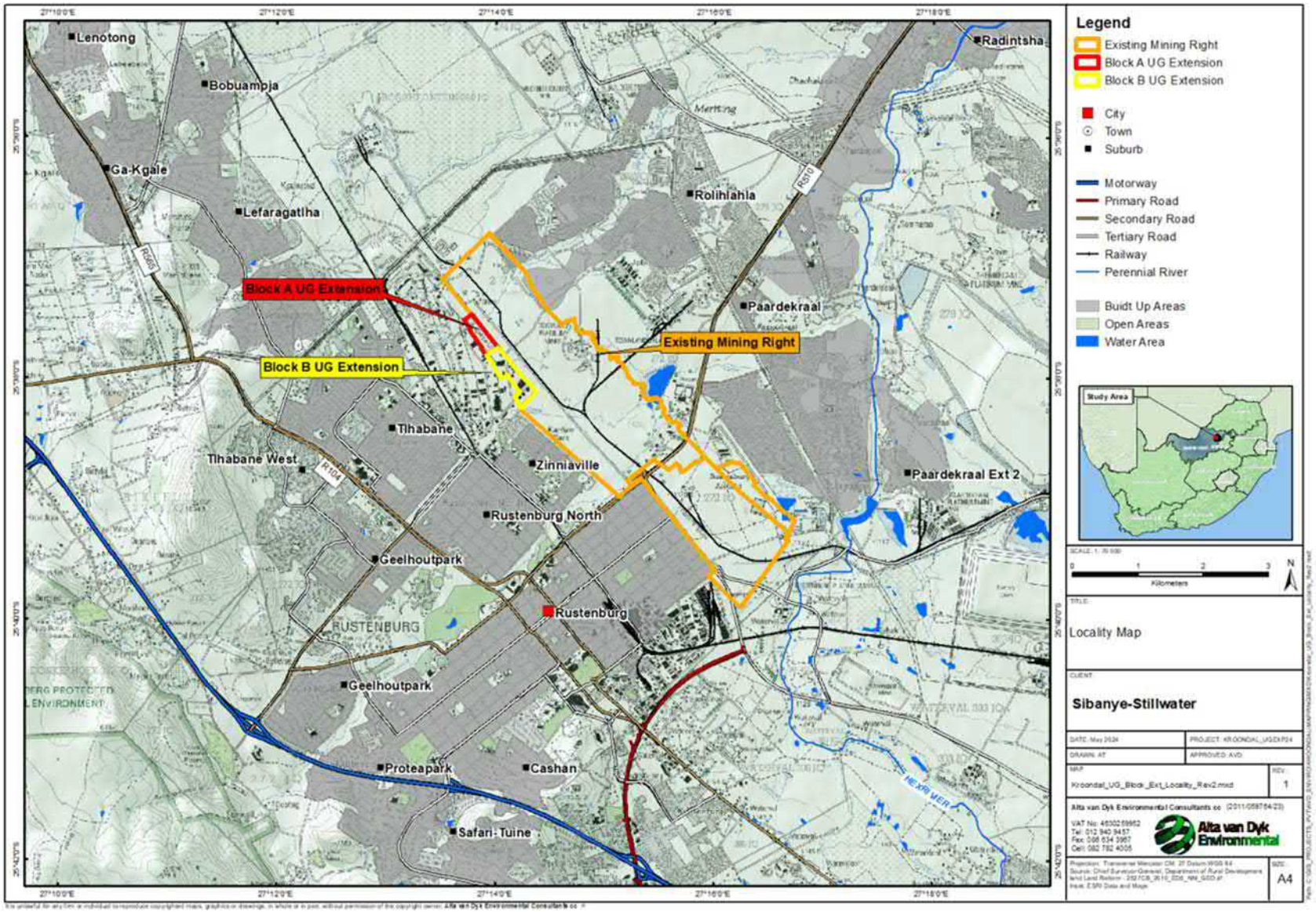


FIGURE 1: POTENTIALLY AFFECTED PROPERTIES

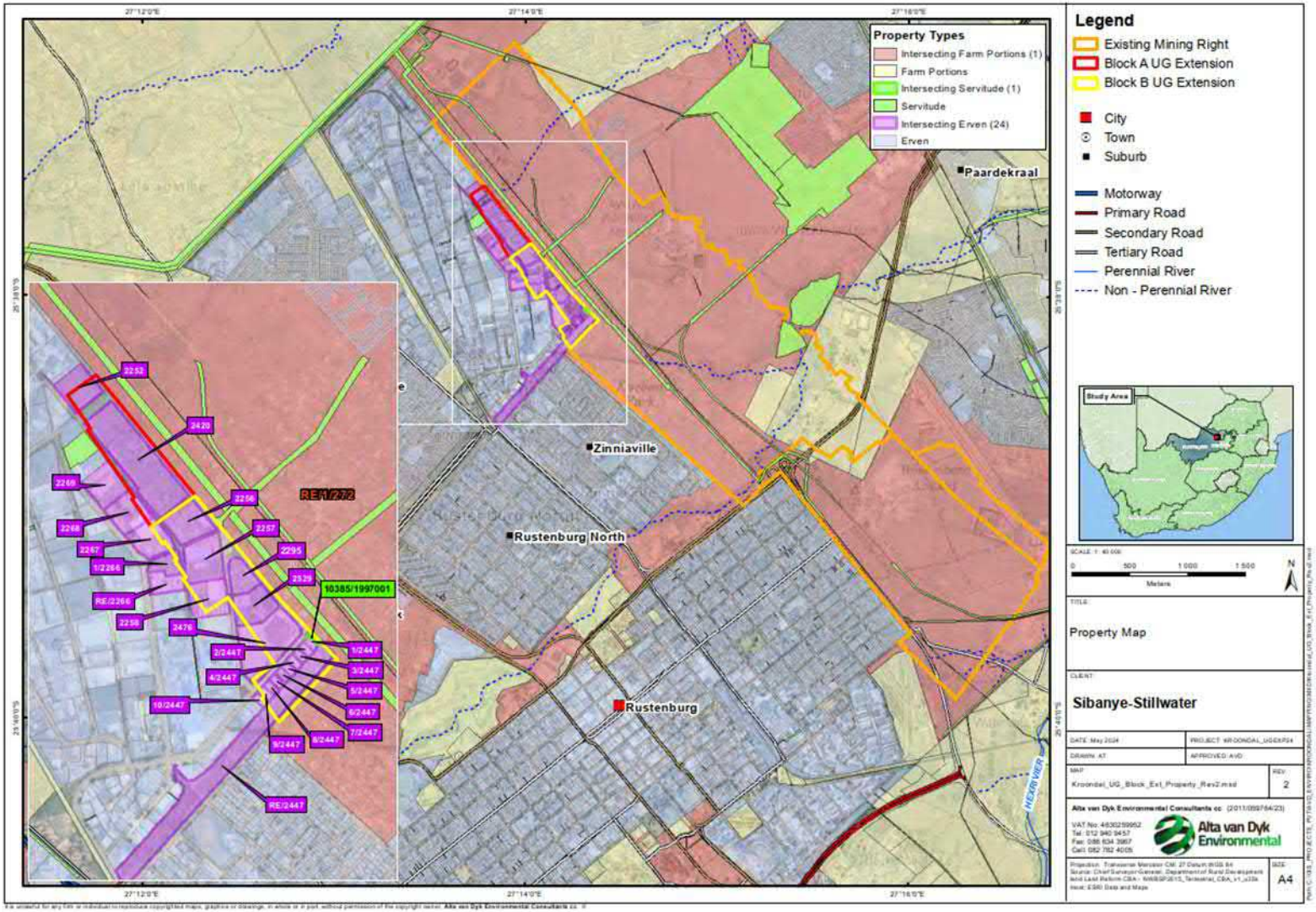


FIGURE 2: PROPERTY MAP

AVALIBILITY OF THE DRAFT BASIC ASSESSMENT REPORT

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09 September 2024

Dear ABI Property Holdings

14 Pongola Crescent, Eastgate Extension 17, Sandton 2199

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 0 of erf 2529

INTRODUCTION AND BACKGROUND

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile. This is as a result of the depressed global market for Platinum Group Metals in conjunction with the decline in production of the shafts.

It is the intention of SRPM to expand the Kwezi underground operations through the inclusion of the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025. At current spot prices, Kwezi shaft needs the UG2 Shallows blocks to maintain a sustainable ounce profile of 60 000 to 58 000 oz over life of mine. Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) have been appointed as the Environmental Assessment Practitioner for the projects to undertake the environmental related authorisations and associated public participation process.

Project Description

The UG2 shallow blocks (Block A and B) are situated outside of the existing mining right (NW 30/5/1/2/2/80 MR). This application supports the inclusion of the UG2 remaining blocks into the existing approved mining right, in order to increase the production and life of mine for the Kwezi shaft (**Figure 1**).

No new surface infrastructure will be required as the existing shaft will be utilised to access the additional blocks. UG2 Shallows Blocks will be accessed via the existing underground mining area via the Kwezi Shaft decline. Mining activities in the UG2 Shallows Blocks are planned 40m below surface. All mining takes place on the reef horizon, and all the ore is transported to surface via an underground conveyor system. Ore will be hauled via existing surface rail network to the Kroondal Concentrators.

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The UG2 Shallow blocks have experienced some significant environmental disturbances already. Block A has an area of 130 473 square meters. There are no building structures above Block A. Block B has area of

219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit

Location

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ.

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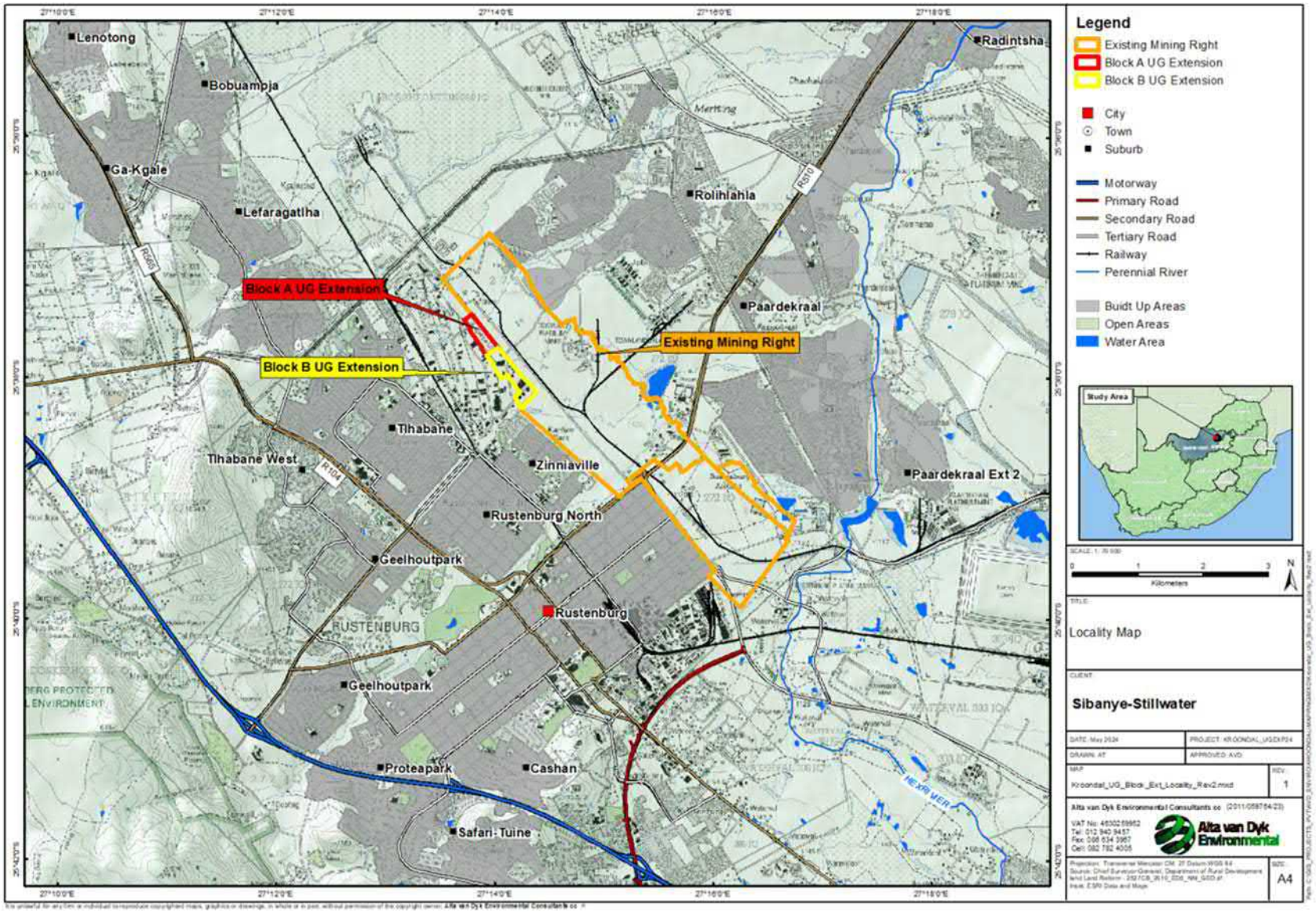


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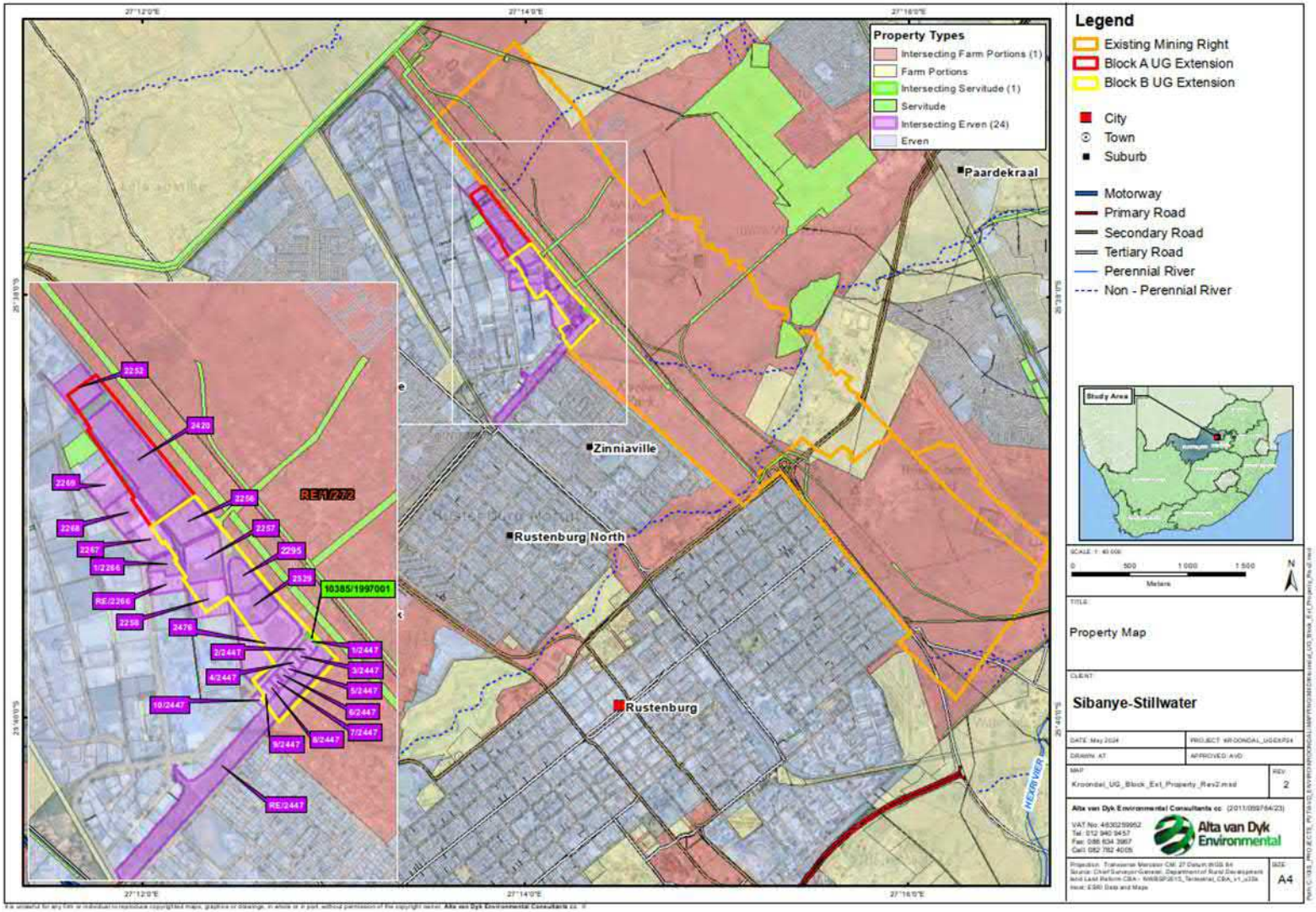


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09 September 2024

Dear ABI Property Holdings

PO Box 76202, Wendywood, 2144

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 0 of erf 2529

INTRODUCTION AND BACKGROUND

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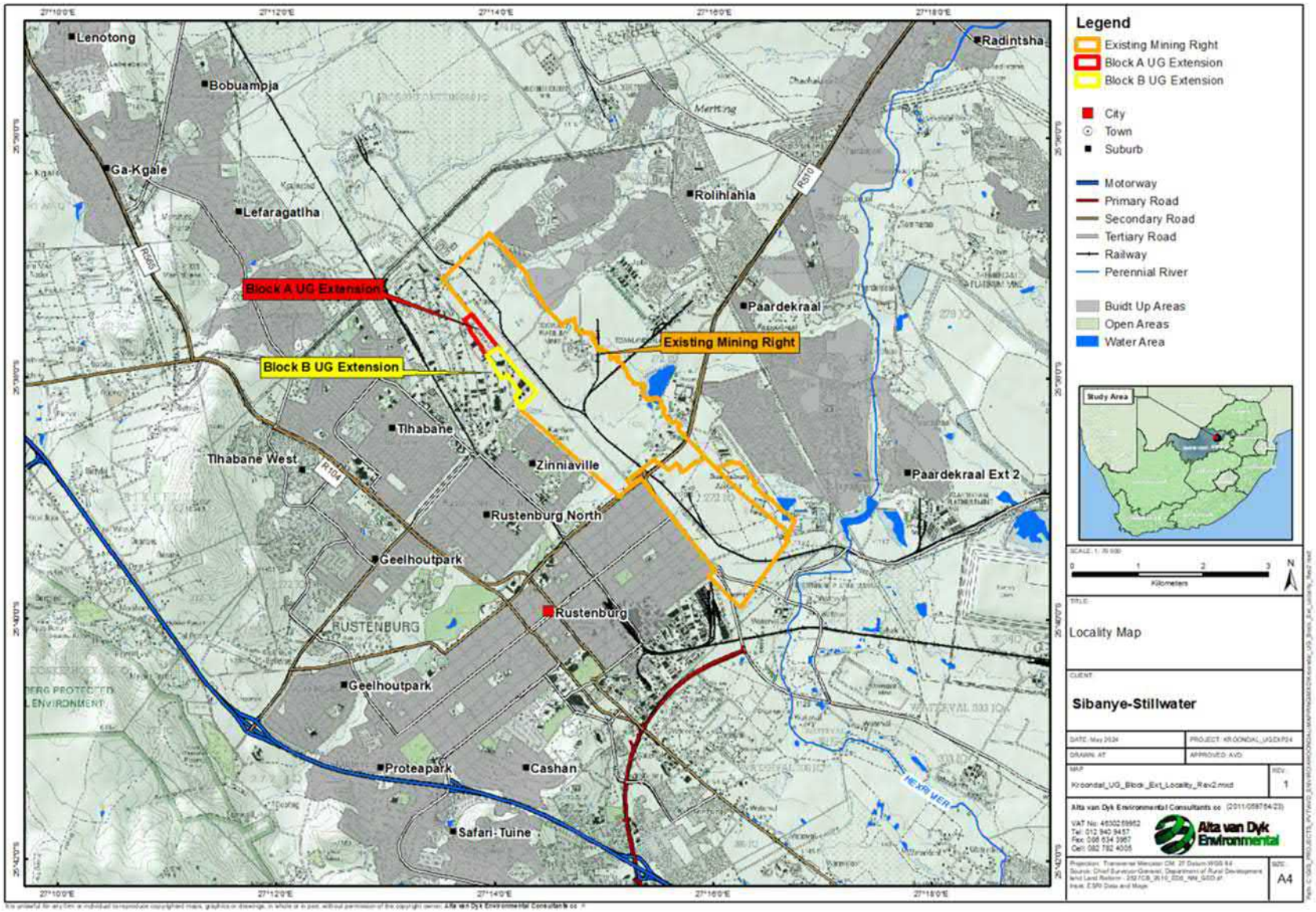


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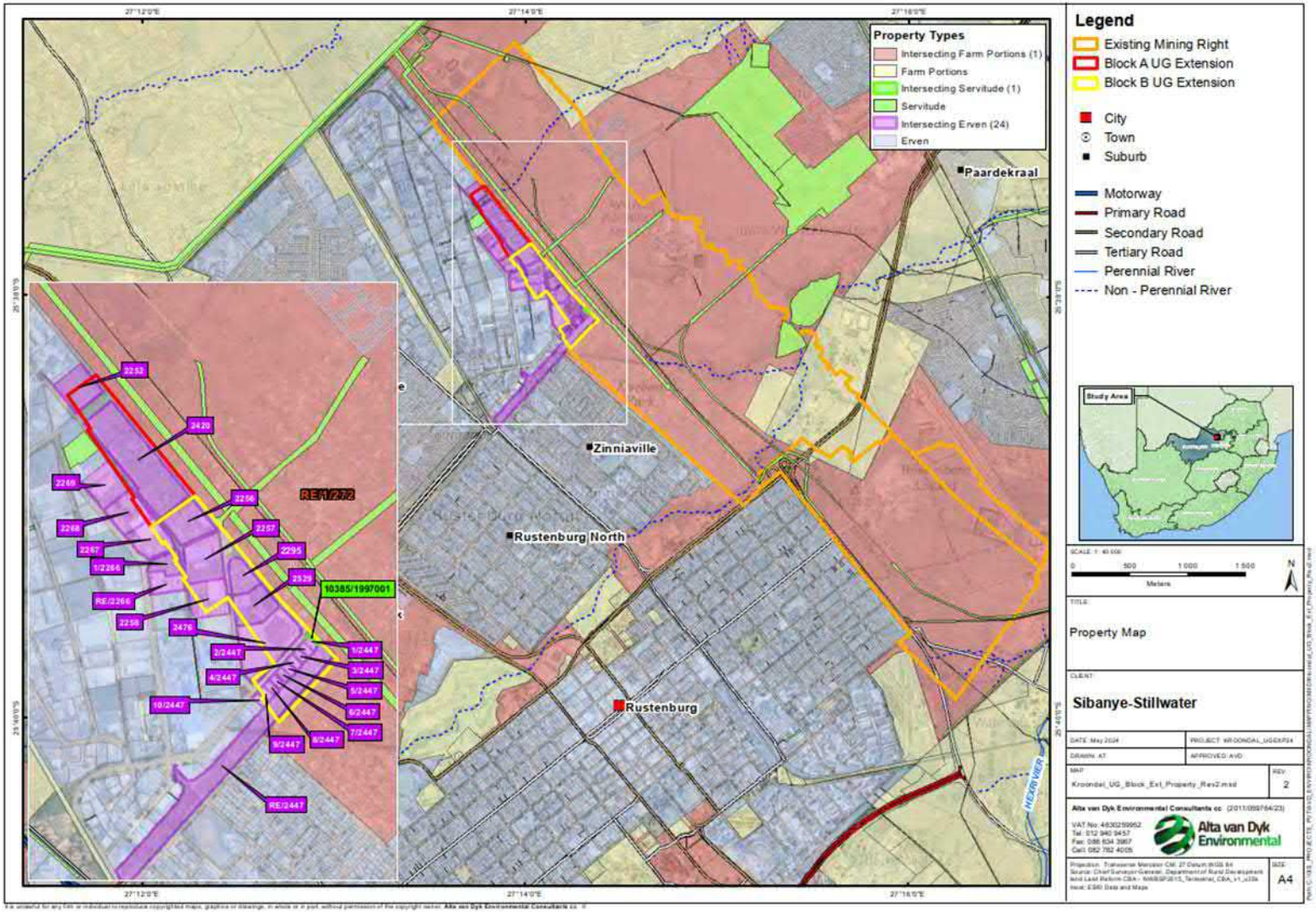


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09 September 2024

Dear Ragie Abdul Aziz
Saloojee Ahmed Yusuf
Ebrahim Muhammed
Ragie Mohammed

Matfar Motor City, Gareth Roberts Avenue, Rustenburg, North West, 0299

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

RE: Portion 4 of erf 2447

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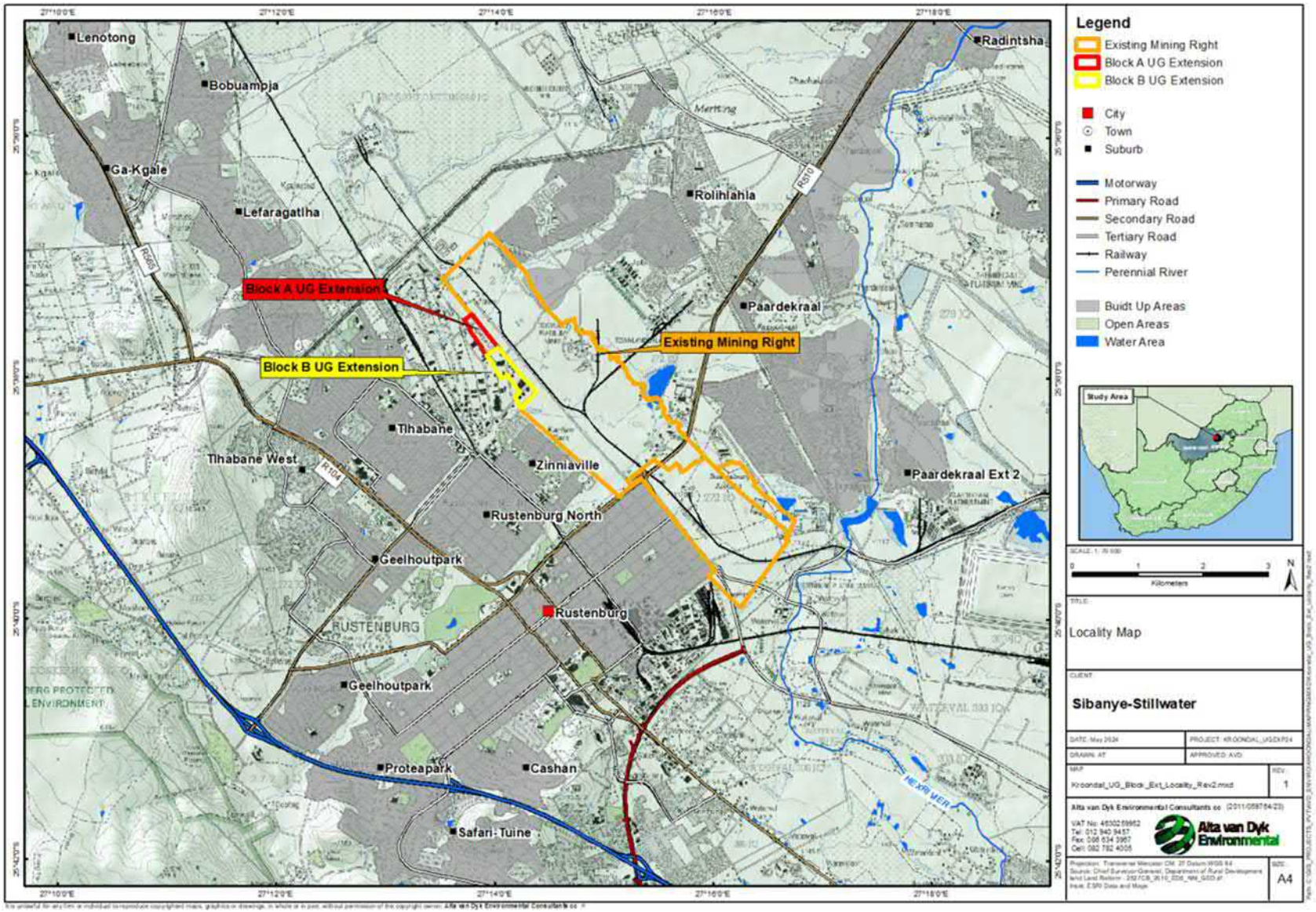


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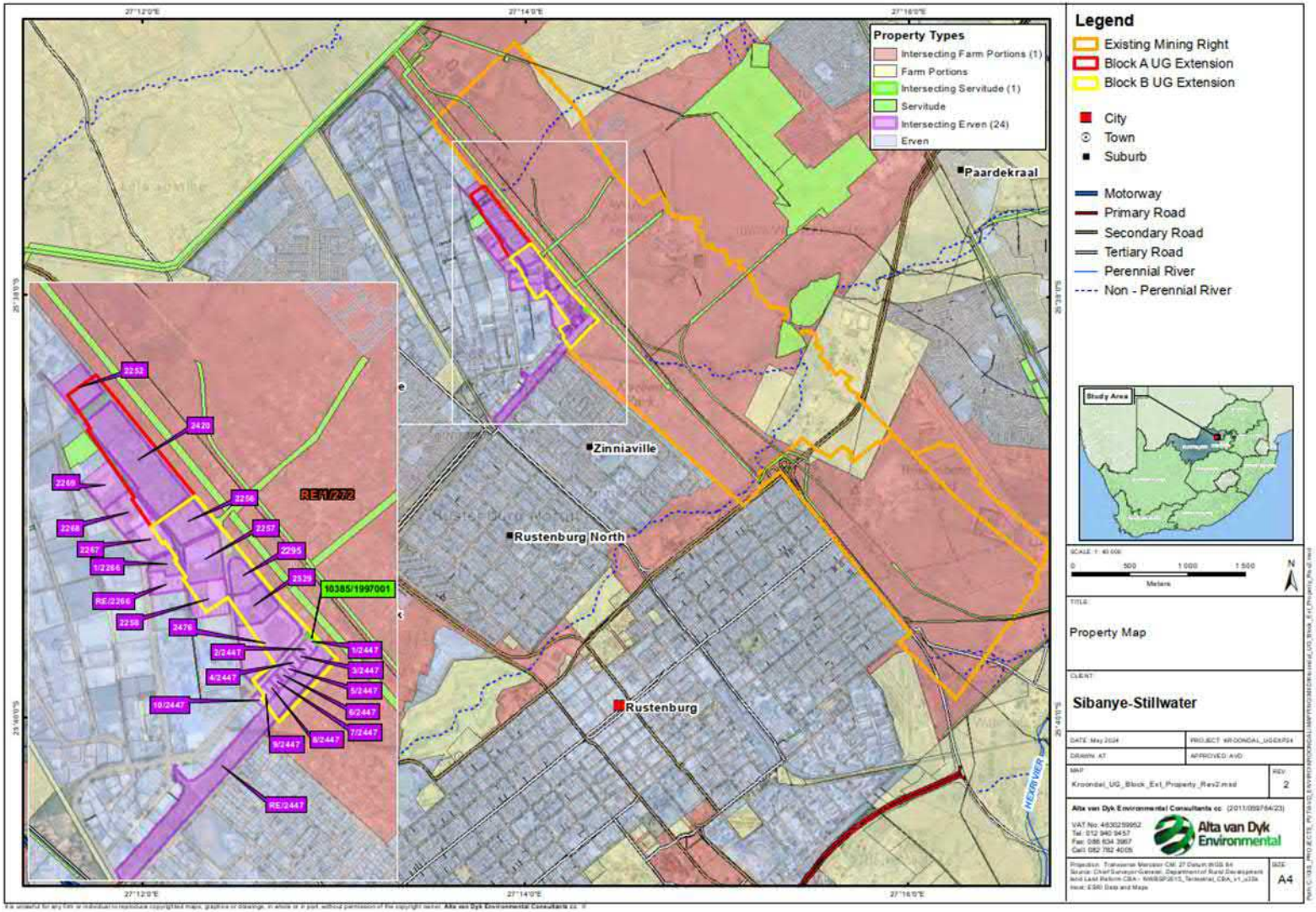


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62 Middle Street, Rustenburg, 0299

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RE: Portion 4 of erf 2447

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219 663 square meters. This area is highly developed and has several warehouses and office blocks directly above the target UG2 mineral deposit

Location

The proposed expansion project is located in the Rustenburg Local Municipality as well as within the Bojanala Platinum District Municipality. Kwezi shaft is situated on Portion 1 of Town and Townlands of Rustenburg 272 JQ.

The potentially affected properties in terms of the proposed expansion of the underground mining areas is provided in **Table 1** and **Figure 2**.

Table 1: Potentially Affected Properties

Farm Name	**Block A and B** **Farm Name: Town and Townlands of Rustenburg 272JQ** • Portion 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of erf 2447 • Portion 0 of erf 2258 • Portion 0 of the erf 2266 • Portion 1 of the erf 2266 • Portion 0 of erf 2267 • Portion 0 of erf 2268 • Portion 0 of erf 2269 • Portion 0 of erf 2252 • Portion 0 of erf 2420 • Portion 0 of erf 2256 • Portion 0 of erf 2257 • Portion 0 of erf 2529 • Portion 0 of erf 2595 • Portion 0 of erf 2476 **Farm Name: Town and townlands of Rustenburg** • Portion 1 of Farm 272 JQ Figure 2 shows the location of these properties in relation to the project area.

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD, a subsidiary of ALTA VAN DYK CORPORATE GROUP
Registration Number: 2011/059764/23/Vat No: 4630259952

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Private Bag X1007
Lyttleton
1040

Tel: 012 940 9457
Cell: 076 314 3604
Fax: 086 634 3967
reata@avde.co.za

"…for the silent ones…"

AUTHORISATIONS REQUIRED

The following authorisations are required per the applicable legislation:

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA. The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).

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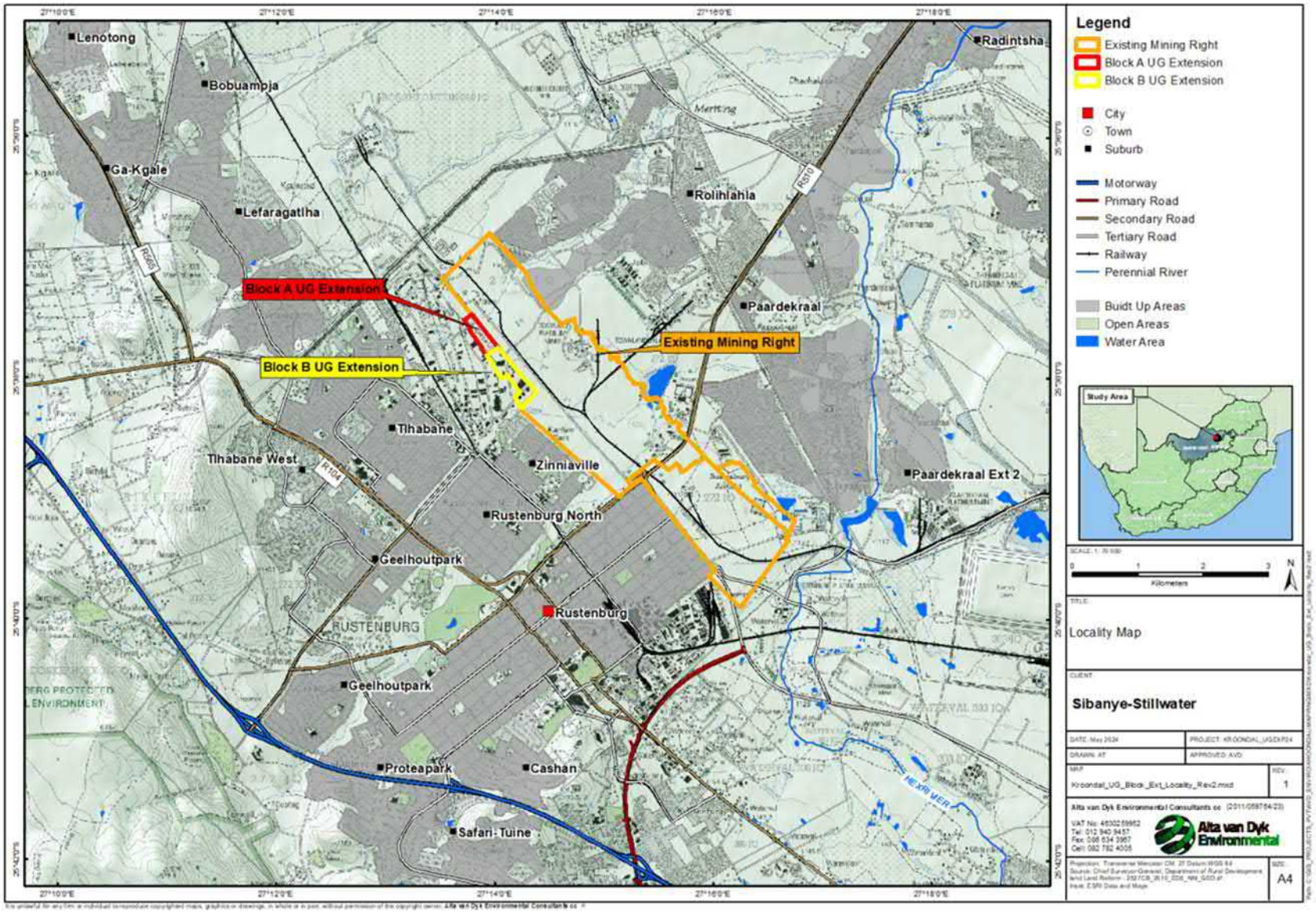


FIGURE 1: POTENTIALLY AFFECTED PROPERTIES

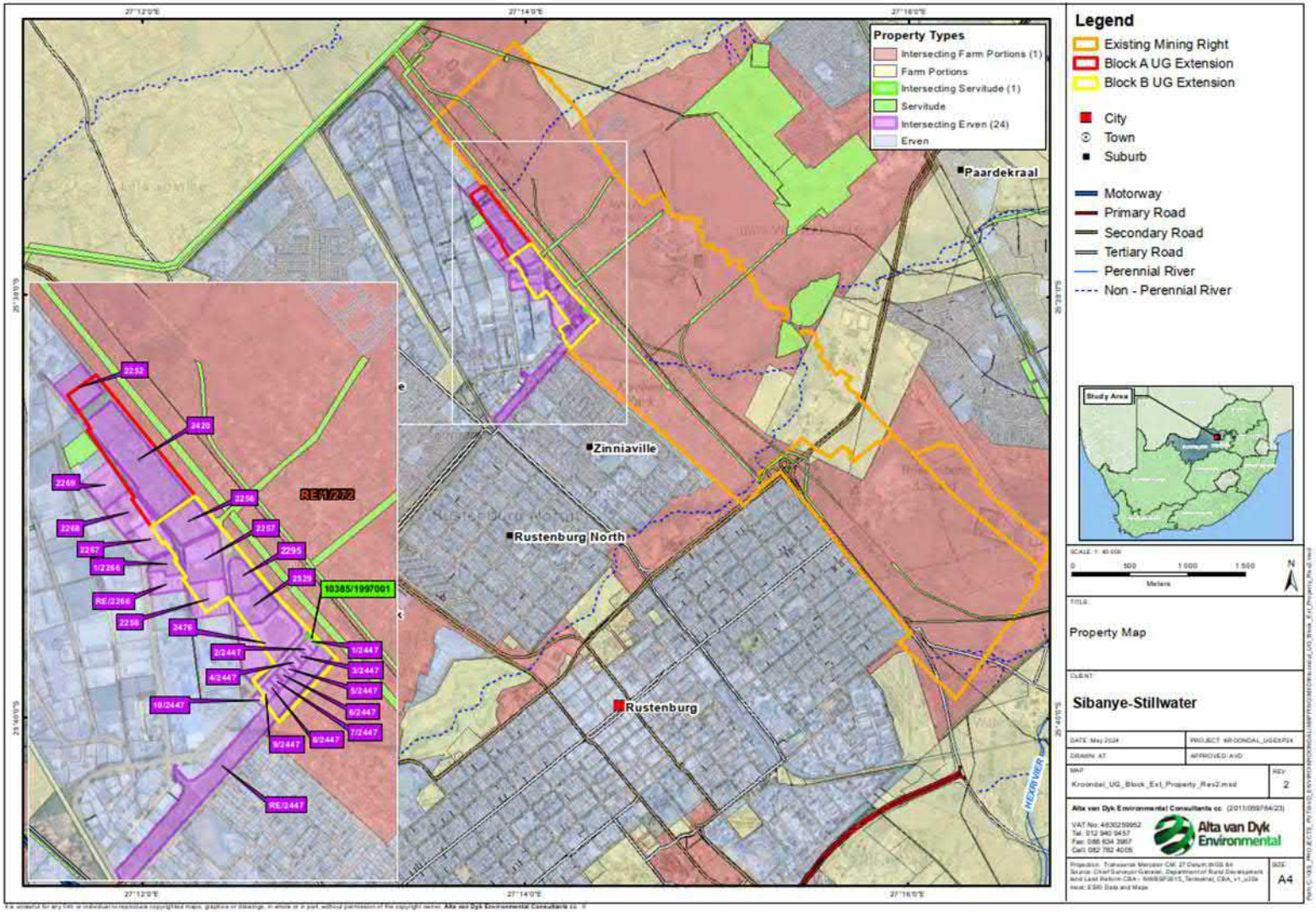


FIGURE 2: PROPERTY MAP

AVALIBILITY OF THE DRAFT BASIC ASSESSMENT REPORT

The Draft Basic Assessment report will be made available for public comment for a period of 30 days. Registered Interested and Affected Parties will be informed on the availability of the document for review and comment.

If you would like more information on the proposed project, or comment on the proposed project, please direct all enquires to Kirthi Peramaul.

Kind regards,

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457
Fax number: 086 634 3967
Postal Address: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za

Minutes

Sibanye Stillwater	
Date: 7 October 2024	

Meeting Details: Sibanye Stillwater Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks **Focus Group Meeting with South African Breweries**		
Date: 07 October 2024	**Time:** 10h00	Teams Meeting
Meeting called by	South African Breweries	
Type of meeting	Focus Group Meeting	
Facilitator	Kirthi Peramaul	
Note taker	Kirthi Peramaul	
Attendees	**Alta van Dyk Environmental (Pty) Ltd (AvDE)** Kirthi Peramaul (KP) **South African Breweries (SAB)** Abongile Swana (AS) Juan Reid (JR) Thabang Mashia (TM) Miles Saxby (MS)	
Apologies	-	

Presentation

A presentation was given by Kirthi Peramaul of AvDE, including the purpose of the meeting, background to Kwezi Mining Operations, project description, legislative requirements, specialist studies, and public participation.

Please refer to Appendix A for a copy of the presentation.

Discussion

- **SAB** required clarity on the location on the mining and if there is intent on building on top of the facility.
- There is only one road in and out of the depo, as the depo turns around a significant number of trucks. Will the Road be affected and to what extent.
    - **KP** confirmed that the proposed project is for underground mining. It is the intention of Sibanye Stillwater Rustenburg Platinum Mine (SRPM) to expand their Mining Right Area (MR80). In addition, SRPM intends to mine Blocks A and B. At this stage plans for the greater mining area are not in place. A & B is approximately 5 years.
    - **KP** advised that no surface infrasturture is proposed.
- **SAB** advised that they make use of boreholes on site for drinking, sanitation and cleaning purposes. They have a treatment facility on site for the purification of the water.
    - **KP** advised that a groundwater assessment is currently underway to assess the possible impacts, eg drawdown cone and yield of the borehole.
    - **SAB** enquired, when will feedback be received on the groundwater assessment and when will the study be concluded.
    - **KP** advised that the study is underway, and the groundwater report will be available once the Draft Basic Assessment Report has been placed out for review and comment. This will be a 30-day comment period.
- **SAB** indicated that alcohol stored on site, trucks and forklifts. How will the blasting affect the operations.

- **KP** confirmed that blasting will be undertaken, and a vibration and blast impact assessment has been undertaken together with the required potential impacts and the associated mitigation measures. The blast design is adjusted accordingly to ensure vibration impact is within the required limits. The report will also be available once the Draft Basic Assessment report is placed out for the 30 day public review period.

- **SAB** enquired if the Mining Right will be on their property.
  - KP advised that SAB still holds the surface right, even though the application is for the expansion of the mining right. This application is for the underground mining.
- **SAB** enquired if there is dolomite in the area
  - KP advised that she could not provide an answer in the meeting. A stability assessment was undertaken, and the presence or absence will be confirmed through the assessment.
- **KP** advised that all comments can also be submitted to AvDE for a response from the project team
- **SAB** enquired if their borehole is more than 40m below surface. Will they be compensated from the mine to go back to municipal water.
  - **KP** advised that the study is underway. SRPM is aware of the shallow mining. Should the groundwater study reveal that supply will be interrupted, SRPM will look into the appropriate mitigation measures.
- **SAB** stated that they have two main concerns
  - Earth movement through blasting
  - Water supply issues and impact on the boreholes
- **SAB** indicated if there have been similar engagements with other stakeholders and if the comments similar.
  - KP advised that distribution of Background Information documents have been undertaken. Interested and Affected Parties have made contact and submitted their comments, where meetings are requested then these will be undertaken. Because groundwater is used within the area, comments on groundwater have come through thus far.
- **SAB** enquired if there a deadline for the submission of the comments
  - KP indicated that this is the pre-application public participation. Once the Draft Basic Assessment report is issued out. Then a 30-day comment period will be given.

Action Items	**Person Responsible**	**Deadline**
Compile and distribute minutes of meeting	KP	ASAP

Minutes

Sibanye Stillwater	
Date: 7 October 2024	

Appendix A: Presentation



The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

SA Breweries MEETING

07 October 2024, 10:00 AM

Alta van Dyk Environmental

Agenda

- Introduction and Welcome
- Background on the Project
- Project Description
- Needs and Desirability
- Legislative Requirements
- Specialist Studies
- Public Participation

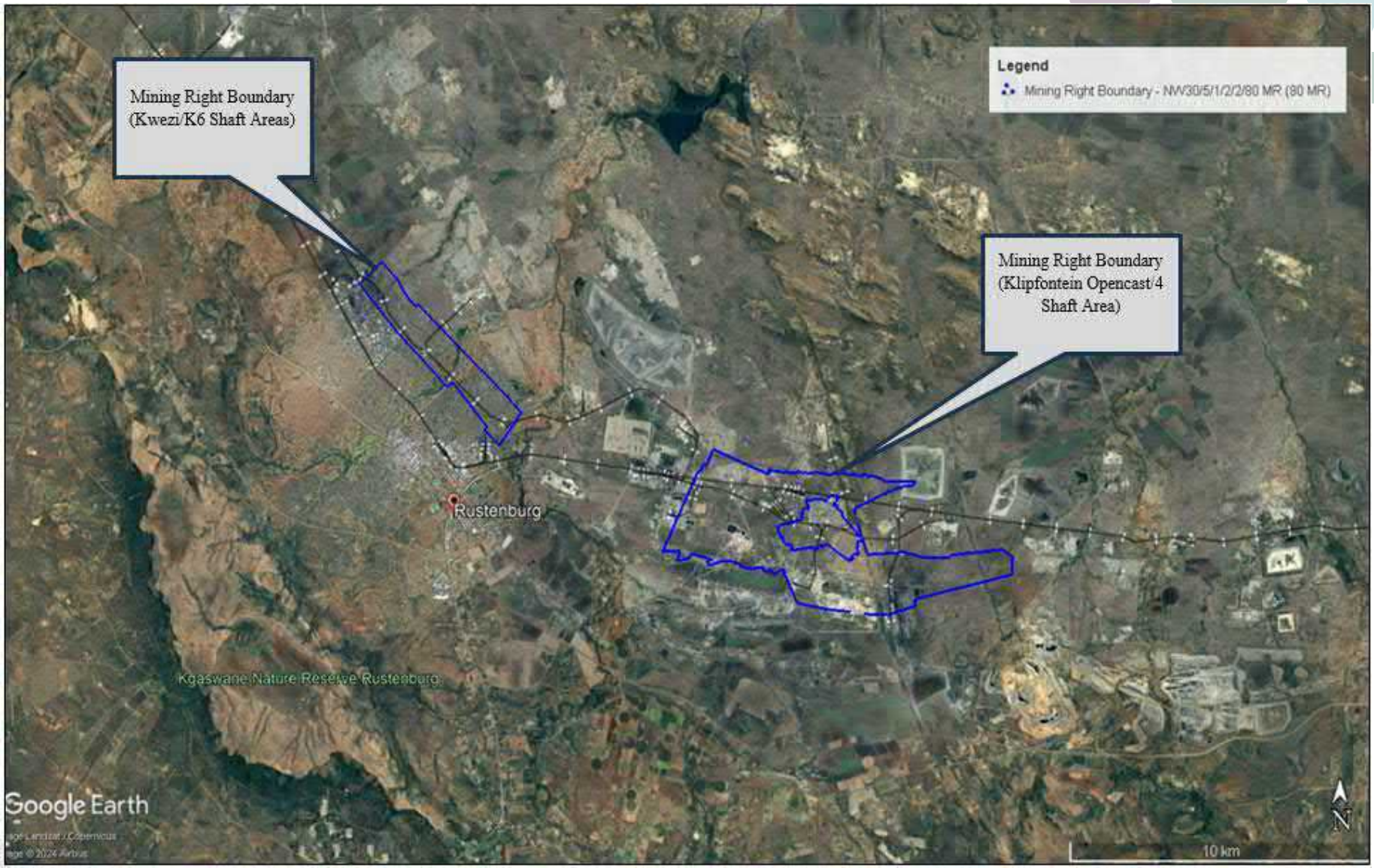
Alta van Dyk Environmental

Background

- The operation and management of the Kwezi Shaft initially formed part of a pooling and sharing agreement (PSA) between Anglo American Platinum and Sibanye-Stillwater
- In 2023 the agreement came to an end and is now fully owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd
- It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province
- In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B)

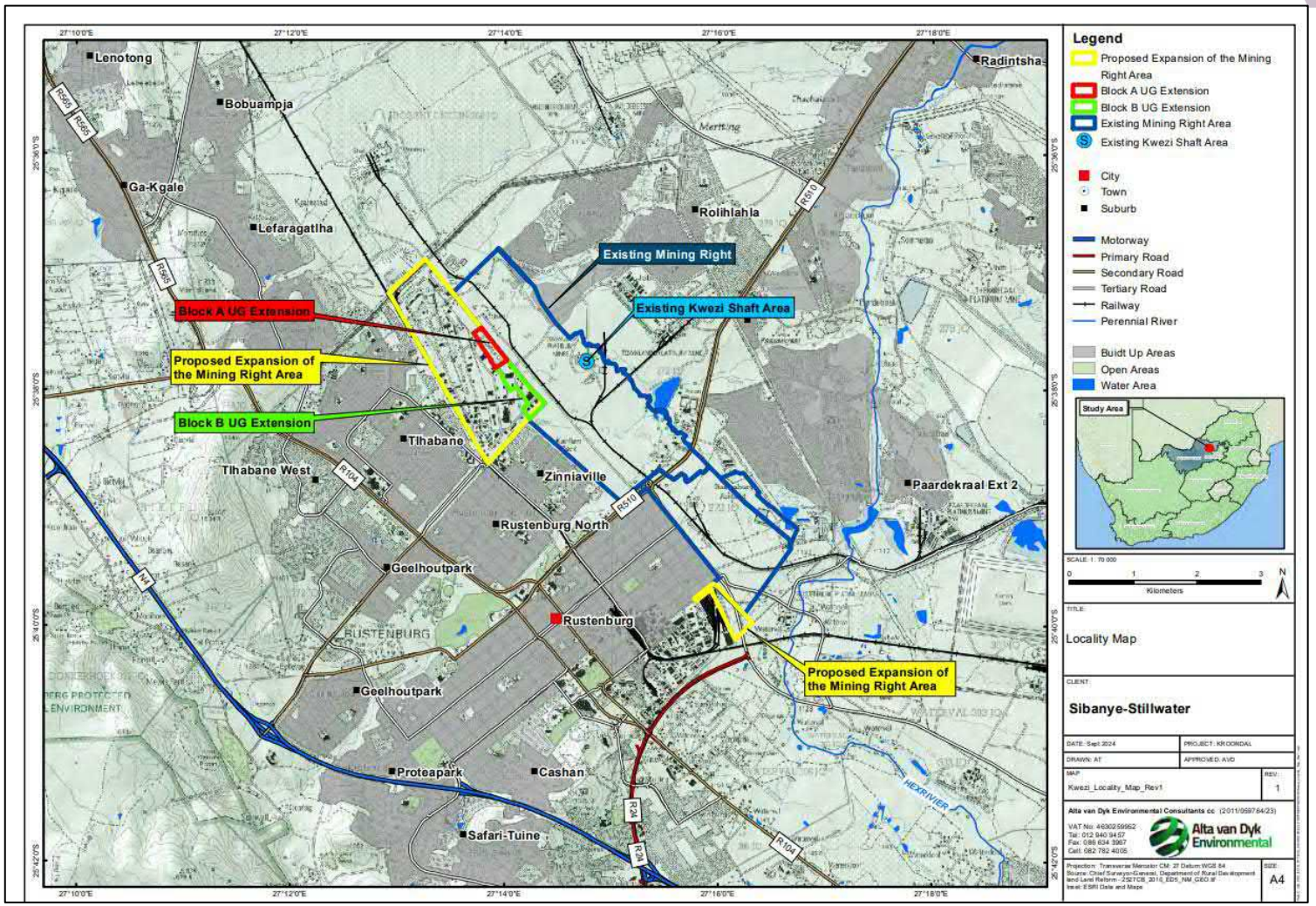
Alta van Dyk Environmental

Mining Right Area



Alta van Dyk Environmental

Project Locality



- North of the town of Rustenburg
- Rustenburg Local Municipality
- Bojanala District Municipality
- North West Province

Alta van Dyk Environmental

Needs and Desirability

- Kwezi Shaft mines the UG2 reef reserve within the mining lease limits as described under the mining rights NW 30/5/1/2/2/80 MR
- Kwezi Shaft is on its production decline phase with the expected life of mine of until 2027.
- Due to the depressed Platinum Group Metals (PGMs) global market and the declining production profile at Kwezi Shaft there is urgent need to find additional ounces to maintain a sustainable production profile.
- The UG2 Shallows blocks will add much needed ounces to keep both shafts production profiles at the sustainable levels.
- Timely addition of the UG2 Shallows blocks to the existing Kwezi Shaft profile is required to optimise existing critical mass before decline in early 2025.

Alta van Dyk Environmental

Project Description

- UG2 Shallows Blocks will be accessed via the existing underground mining area via the Kwezi Shaft decline
- Mining activities in the Shallows are planned to the maximum depth of 40m, below surface.
- There is no additional requirements for surface mining infrastructures such as ventilation shafts during extraction of the UG2 Shallows block
- Sibanye Stillwater applies a room and pillar mining method through the use of mechanised mining equipment.
- All mining takes place on the reef horizon, and all the ore is transported to surface via an underground conveyor system
- Ore will be hauled via existing surface rail network to the Kroondal Concentrators

Alta van Dyk Environmental

Legislative Requirements

- National Environmental Management Act (NEMA) (Act 107 of 1998) supporting a S102 Application as defined within the MPRDA.
  - Basic Assessment (BA) Process
  - The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).
- National Environmental Management Act (Act 59 of 2008)
  - Category A, Activity 13 – Basic Assessment Process
- Mineral and Petroleum Recourses Development (Act 28 of 2002)
  - The S102 application is managed by Sibanye Stillwater and will be submitted on SAMRAD.
- Water Use License Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998).
  - The Competent Authority is the Department of Water and Sanitation

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Specialist Studies

- Wetland Assessment
- Hydropedological Assessment
- Vibration and Blast impact assessment
- Rock Stability Assessment
- Groundwater assessment
- Financial Provision (Kwezi shaft are already included in the mines financial provision and rehabilitation plan)

Alta van Dyk Environmental

Public Participation

- Placement of Site Notice in and around Project Area
- Distribution of Background Information Documents (BID)
- Placement of Newspaper Advertisement
- Engagement with Ward Councillors
- Notification Letters and Emails to all registered I&AP's
- Maintain an I&AP database
- Placement of the BID and DBAR of Ulwazi

Alta van Dyk Environmental

Discussion and Conclusion

Alta van Dyk Environmental

Minutes

Sibanye-Stillwater	
06 November 2024	

Meeting Details: **Project: The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Right Operations through the Inclusion of the UG Shallow Blocks**		
Date: 06 November 2024	Time: 11:00	Place: Sibanye Recreational Club
Meeting called	Alta van Dyk Environmental Consultants	
Type of meeting	Focus Group Meeting	
Facilitator	Kirthi Peramaul	
Note taker	Kirthi Peramaul and Calvin Kaspersen	
Attendees	Kirthi Peramaul (KP) – Alta van Dyk Environmental Consultants Pty Ltd Calvin Kaspersen (CK) - Alta van Dyk Environmental Consultants Pty Ltd Yolande Janse van Rensburg (YJvR) – Sibanye Stillwater Phillip Ramphisa (PR) – Sibanye Stillwater Alan Olivier (AO) – Sibanye Stillwater Lukas Kekana – Sibanye Stillwater Joyee Mabe – Sibanye Stillwater Marius van Biljon (MB) – MvB Consultants Gerhard Maree – Afri Readymix Rossi Rossouw – Steel&Pipes Vinysile Kona – VK Chrome Henry Lockert – Waterflex Arthur Cockcroft – Self RMP Herman Brand – Rustenburg Industrial Park Dirk Odendaal – Rustenburg Galvalizers Karabo Segoe – Intermine Agencies Emile Euler – Euro Sales Dirk Ferrari – Euro Sales Rodney Vermaak – Ancorville Zambezi Fuels Jacques Marais – Maita Wzitonia Naas van Rooyen – RSC NF Alberts – Cemblocks Jenalee Govender – PMO Bez – PMO Ruben Cilliers – Landowner Andre Cilliers – Landowner Jacques Gouws – Sibanye Stillwater	
Apologies	None	

Opening and Welcome

KP welcomed all present and ask that everyone sign the register

Presentation

See the PowerPoint Presentation appended.

KP presented the introduction slides

- **KP conducted a safety moment.**

KP presented the Project Description, Regulatory Process, Specialist Studies, Public Participation Process and the summary of the comments received to date

Discussion: Below provides a summary of comments provided for each topic of discussion

- **Comment:** Why is the presentation indicating that the maximum depth is 40m
  - **Response (SS):** Mining will be undertaken at 40m below surface. The Vibration assessment has indicated that mining can be undertaken at 30m below surface, however the mine is using the conservation approach and mining at 40m

- **AO explained the mining process,** including blast vibrations and monitoring sites.
  - **Question:** What happens if buildings are damaged, even though studies indicate this won't occur? Is there a difference between scientific predictions and real-world outcomes?
    - **Response (SS):** The likelihood of such damage occurring is low. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec.
  - **Question:** How will you convince insurance companies?
    - **Response (SS):** We discussed this with Sibanye Business Development, who noted that comments will need to be considered. Sibanye Stillwater indicated that discussions with insurance companies will be conducted to include possible indemnities where required and agreed on.
  - **Question:** The tenants on the property will not be pleased on the risks of underground mining and as a result will find alternative premises, resulting in loss of business.
  - **Comment:** Despite studies, disasters like Jaggersfontein still happen. If another company acquires the existing mining operations, who will assume responsibility? Will there be a shift in accountability?
    - **Response (SS):** Sibanye will assume responsibility, but if sold, accountability will shift to the purchasing company. In any business transaction, when you purchase a business, you acquire its liabilities as well.
  - **Comment:** Concerns were raised regarding the condition of Sibanye's above-ground operations. If the state of above-ground operations is poor, how are the underground operations being managed?
  - **Comment:** Sibanye does not provide support for local businesses or repairs.
    - **Response (SS):** Sibanye creates jobs and supports the local economy.
  - **Question:** What is the risk of a sinkhole forming?
    - **Response (SS):** There is no risk of a sinkhole due to the nature of the geology.
  - **Comment:** Mining activities are increasing risk levels. What actions will the mine take to mitigate these risks?
  - **Comment:** The mine should guarantee that sinkholes will not occur.
  - **Comment:** We as Interested and Affected Parties are not getting paid to be at this session.
  - **Comment:** Historical construction did not account for mining and blasting beneath the buildings. Buildings are at risk in terms of cracks and stability.
    - **Response (SS):** We are aware of this and take it into account. Original engineers or construction companies likely did not anticipate future mining operations; however, the Vibration and Stability assessment were conducted with the consideration for both surface structures and underground operations.
- **MB presented on groundwater assessment.**
  - **Comment:** The community has faced water shortages. Mining activities may damage boreholes, raising concerns about water supply reliability.
  - **Comment:** Independent tests conducted show poor water quality
  - water supply issues.

Response (MB): The water table is expected to return to normal levels once mining operations cease. SS will look at a monitoring and management plan to address

AO presented on vibration and stability assessment.

Action Items	Person	Deadline
Send Presentation to the attendees	Kirthi Peramaul	ASAP



The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

Focus Group MEETING

6 November 2024, 11:00 AM

Alta van Dyk Environmental

Agenda

- Introduction and Welcome
- Safety Moment
- Background on the Project
- Project Description
- Needs and Desirability
- Legislative Requirements
- Specialist Studies
- Public Participation
- Summary of the comments received to date
- Findings of the Groundwater Impact Assessment
- Findings of the Vibration and Stability Assessment
- Discussion
- Lunch

Alta van Dyk Environmental

Safety Moment

Windshield Wiper Maintenance



- Windscreen wipers are the small unsung heroes of vehicle
- Important safety devices
- These little pieces of rubber and metal are sometimes required to work for long periods of time, but can only do so efficiently if the correct care is taken



Tips

- You can check by sight for wear and tear of the blade
- Replace the wiper blade (6-12 months)

Alta van Dyk Environmental

Role of the EAP

- We are independent and neutral
- We are the communication bridge between environmental specialist studies; impacts; mitigation measures; community and regulators
- We drive the environmental regulatory process
- We project manage environmental independent and neutral specialist
- We interpretate environmental legislation and guide project design to minimize potential impacts
- We facilitate community understanding of technical information
- We facilitate public participation
- We are not the decision makers

AvDE has been appointed in terms of Regulation 12 of the NEMA EIA Requirements (2014) as amended.

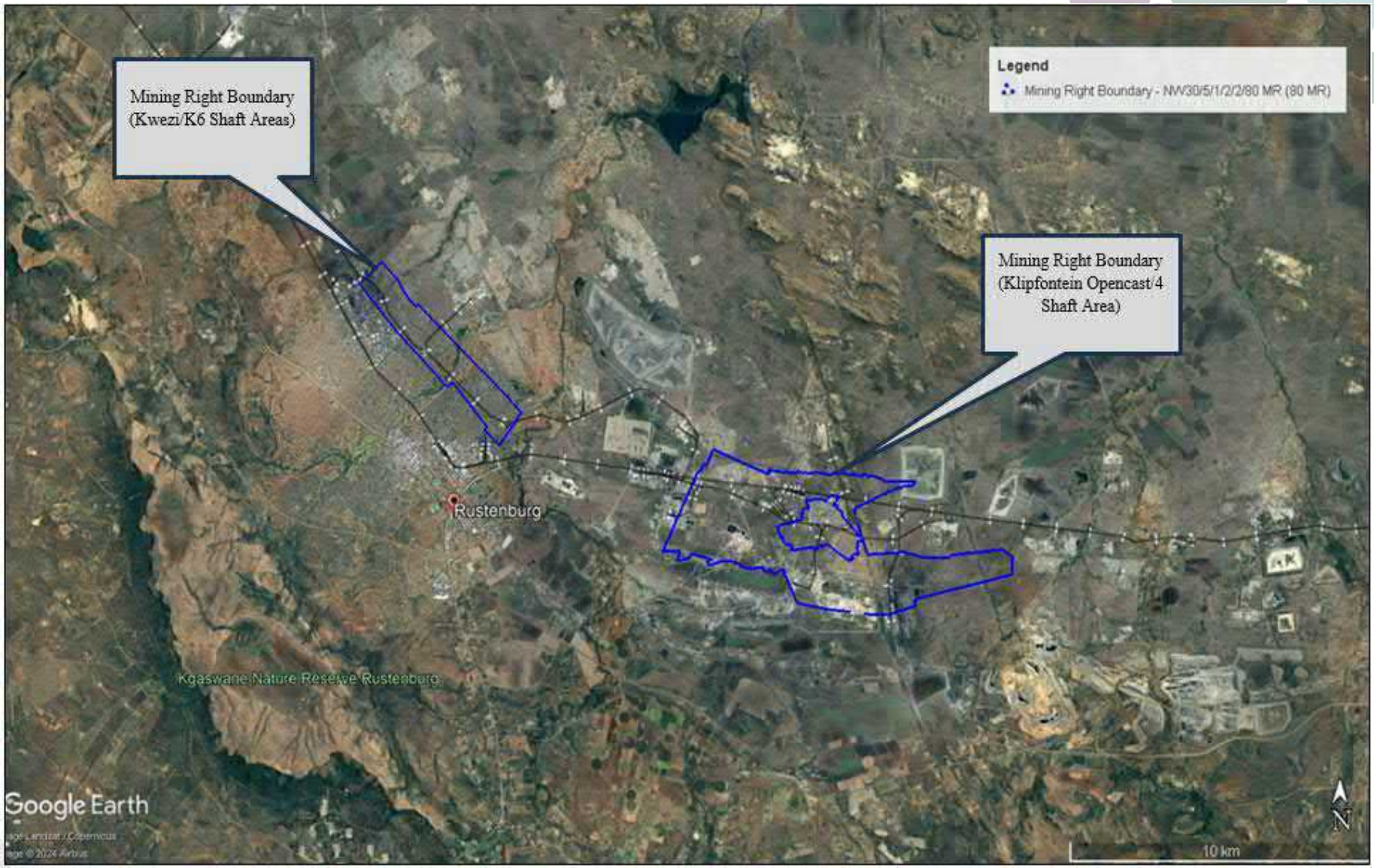
Alta van Dyk Environmental

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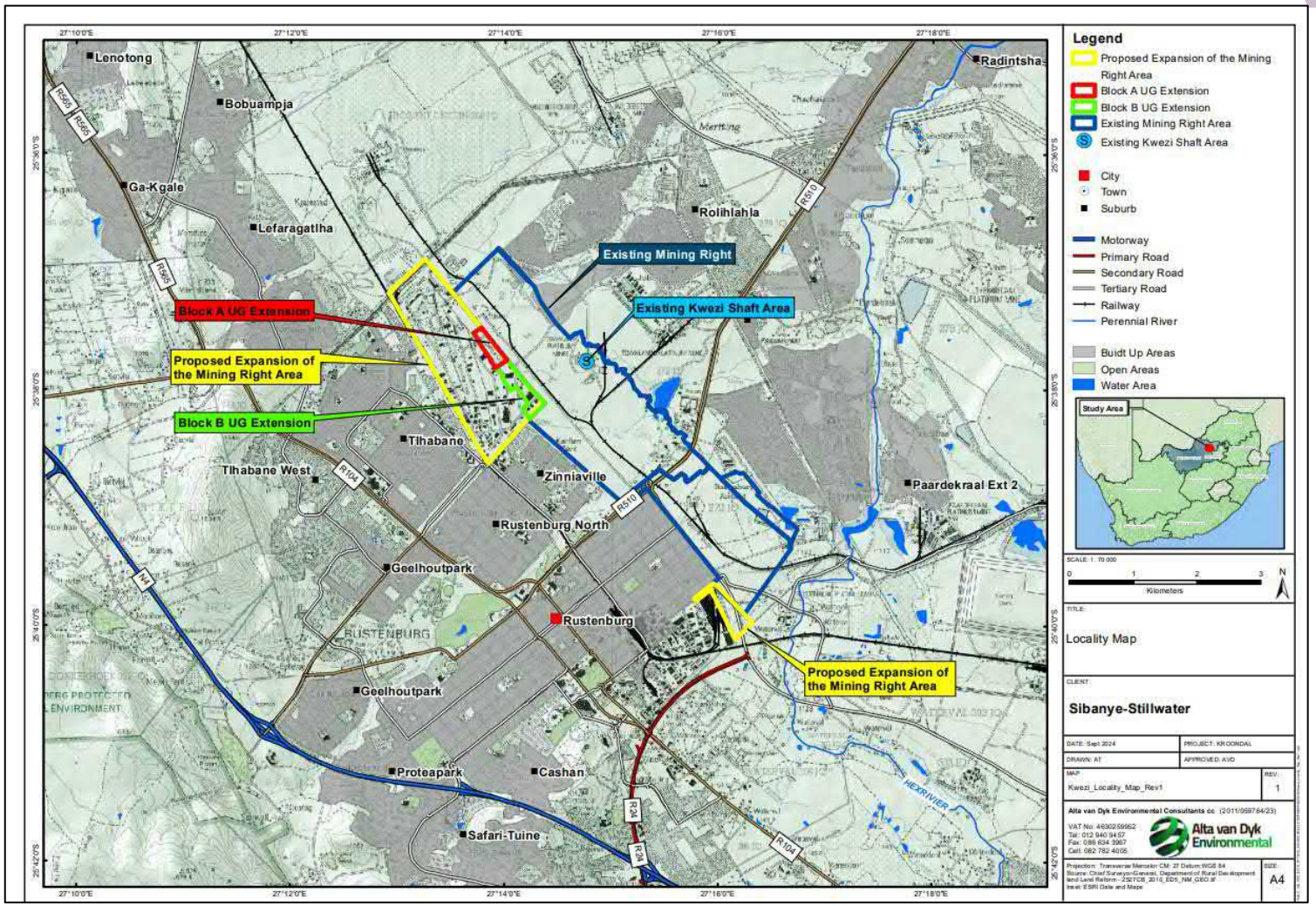
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Mining Right Area



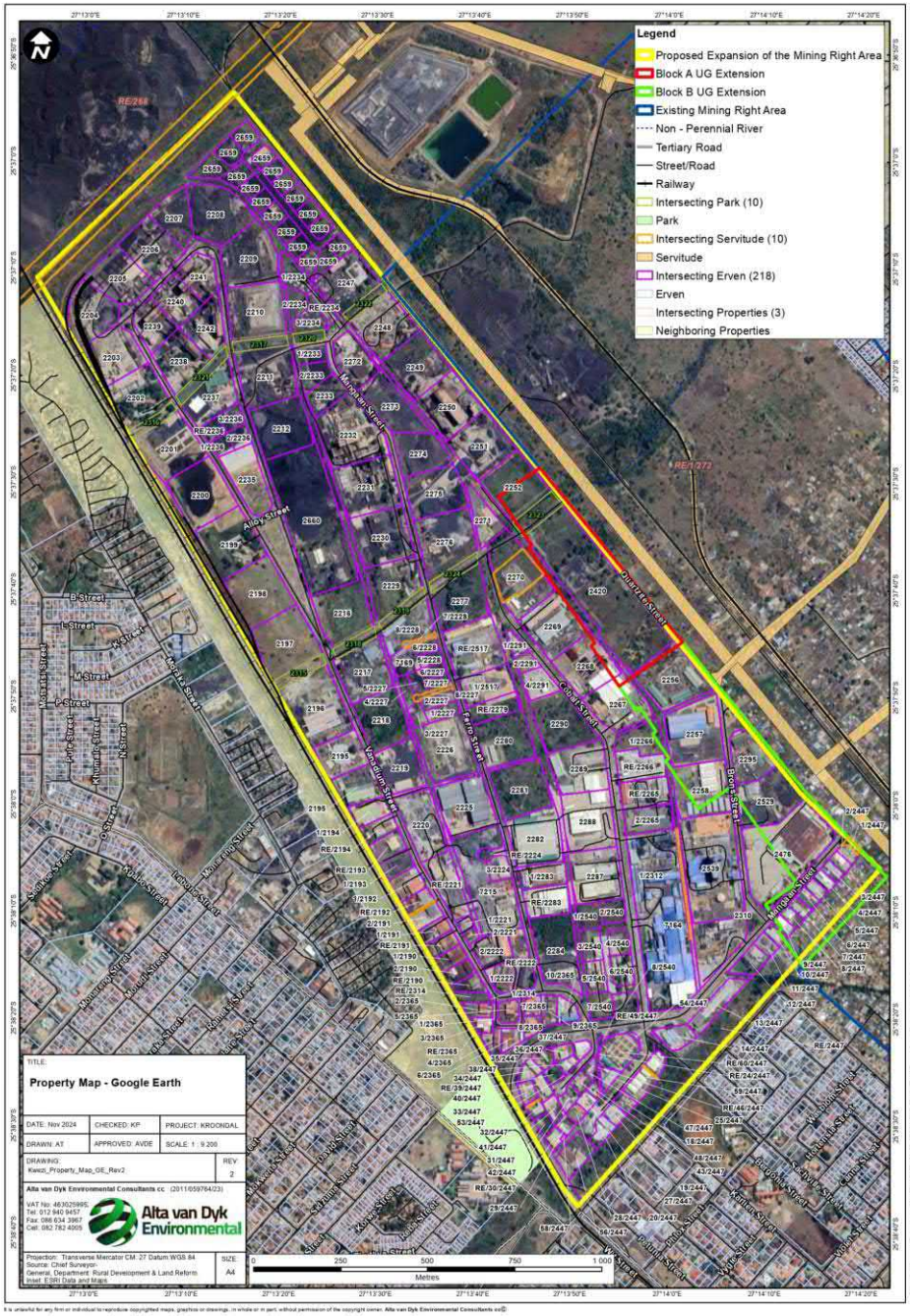
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Project Locality



- North of the town of Rustenburg
- Rustenburg Local Municipality
- Bojanala District Municipality
- North West Province

Alta van Dyk Environmental



Project Locality in Relation to Properties

Portion 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of erf 2447

Portion 0 of erf 2258

Portion 0 of the erf 2266

Portion 1 of the erf 2266

Portion 0 of erf 2267

Portion 0 of erf 2268

Portion 0 of erf 2269

Portion 0 of erf 2252

Portion 0 of erf 2420

Portion 0 of erf 2256

Portion 0 of erf 2257

Portion 0 of erf 2529

Portion 0 of erf 2595

Portion 0 of erf 2476

Farm Name: Town and townlands of Rustenburg

Portion 1 of Farm 272 JQ

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Needs and Desirability

- Kwezi Shaft mines the UG2 reef reserve within the mining lease limits as described under the mining rights NW 30/5/1/2/2/80 MR
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Alta van Dyk Environmental

Legislative Requirements

- National Environmental Management Act (NEMA) (Act 107 of 1998) supporting a S102 Application as defined within the MPRDA.
  - Basic Assessment (BA) Process
  - The competent authority for this process is the North West Department of Mineral Resources and Energy (DMRE).
- National Environmental Management Waste Act (Act 59 of 2008)
  - Category A, Activity 13 – Basic Assessment Process
- Mineral and Petroleum Recourses Development (Act 28 of 2002)
  - The S102 application is managed by Sibanye Stillwater and will be submitted on SAMRAD.
- Water Use License Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998).
  - The Competent Authority is the Department of Water and Sanitation

Alta van Dyk Environmental

NEMA Listed Activities

NEMA Environmental Authorisation – Basic Assessment Process	
Listing Notice and Triggered Activity	**Project Activity Description**
Listing Notice 1 (GNR983) as amended	
Activity 21D - 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, required for such amendment.	This activity is triggered in support of the expansion Kwezi shaft mining right to include the additional UG2 blocks.
Activity 34 - The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution, excluding-	Backfilling of the proposed mining blocks A & B.

NEM: WA Listed Activities

NEM: WA Environmental Authorisation – Basic Assessment Process	
Listing Notice and Triggered Activity	**Project Activity Description**
GN921- 29 November 2013 (as amended)	
Category A: Activity 13 The expansion of a waste management activity listed in Category A or B of this Schedule which does not trigger an additional waste management activity in terms of this Schedule.	This activity is triggered in support of the expansion Kwezi shaft mining areas, specifically relating to the waste rock that will result from the mining activities. The waste rock will not be brought to surface and will packed underground.

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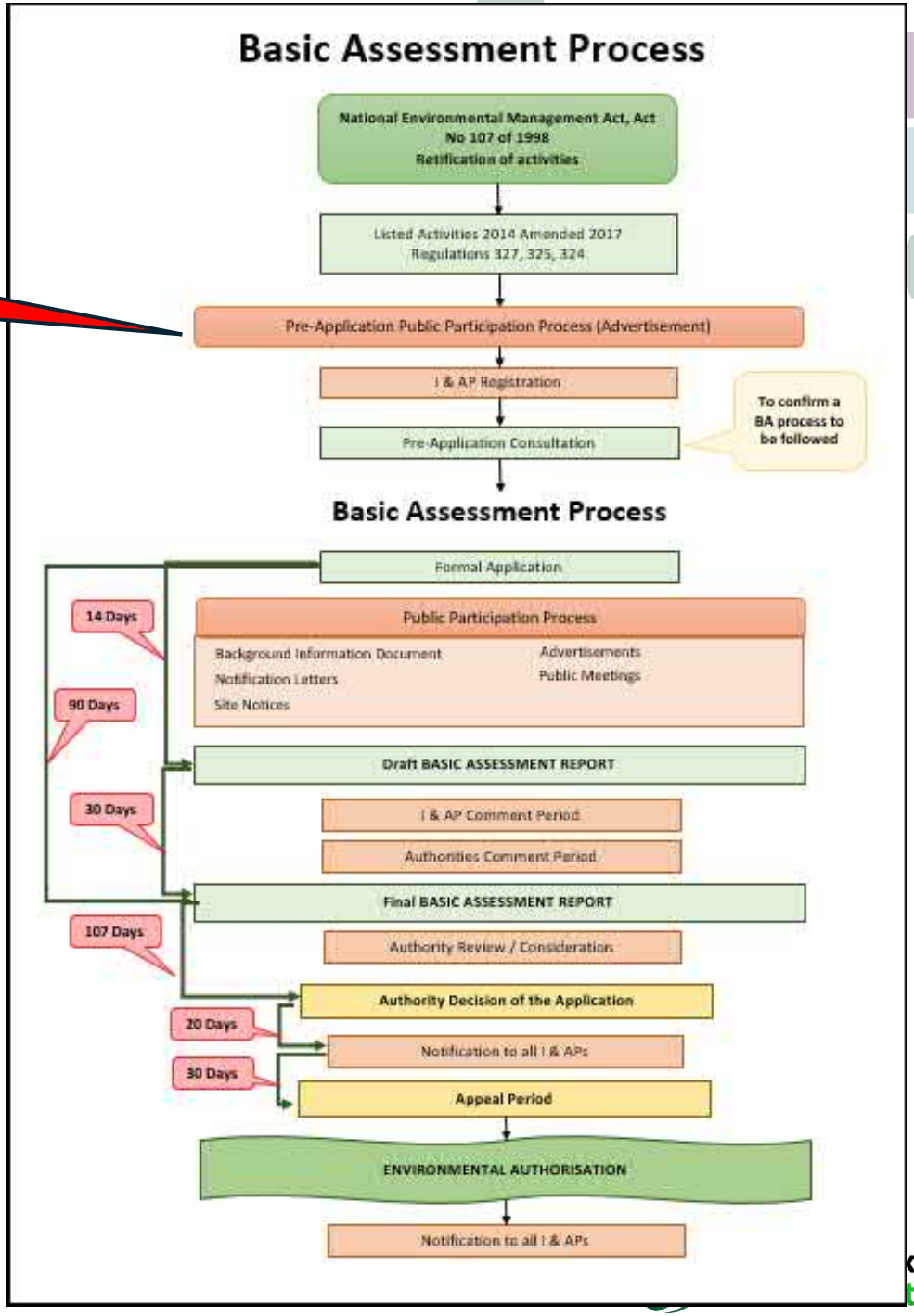
NWA Listed Activities

National Water Act – Water Use Licence	
Water Use triggered	**Project Activity Description**
Section 21(g) – disposing of waste in a manner which may detrimentally impact on a water resource.	Backfilling of the proposed mining blocks A & B
Section 21(c) and (i) – Impeding or diverting the water within a water course and/or altering the beds, banks, course or characteristics of a water course.	Underground mining within 500m from a delineated wetland

Alta van Dyk Environmental

Basic Assessment Process

We are here



Project Timelines

Task	Date
Pre-Consultation Public Participation	3 September 2024
Placement of Draft BAR for Public Review and Comment	14 November until 13 December 2024
Submission of the Final Basic Assessment Report to the DMRE	24 January 2025
DMRE Decision Making Period	12 May 2025

Alta van Dyk Environmental

Public Participation

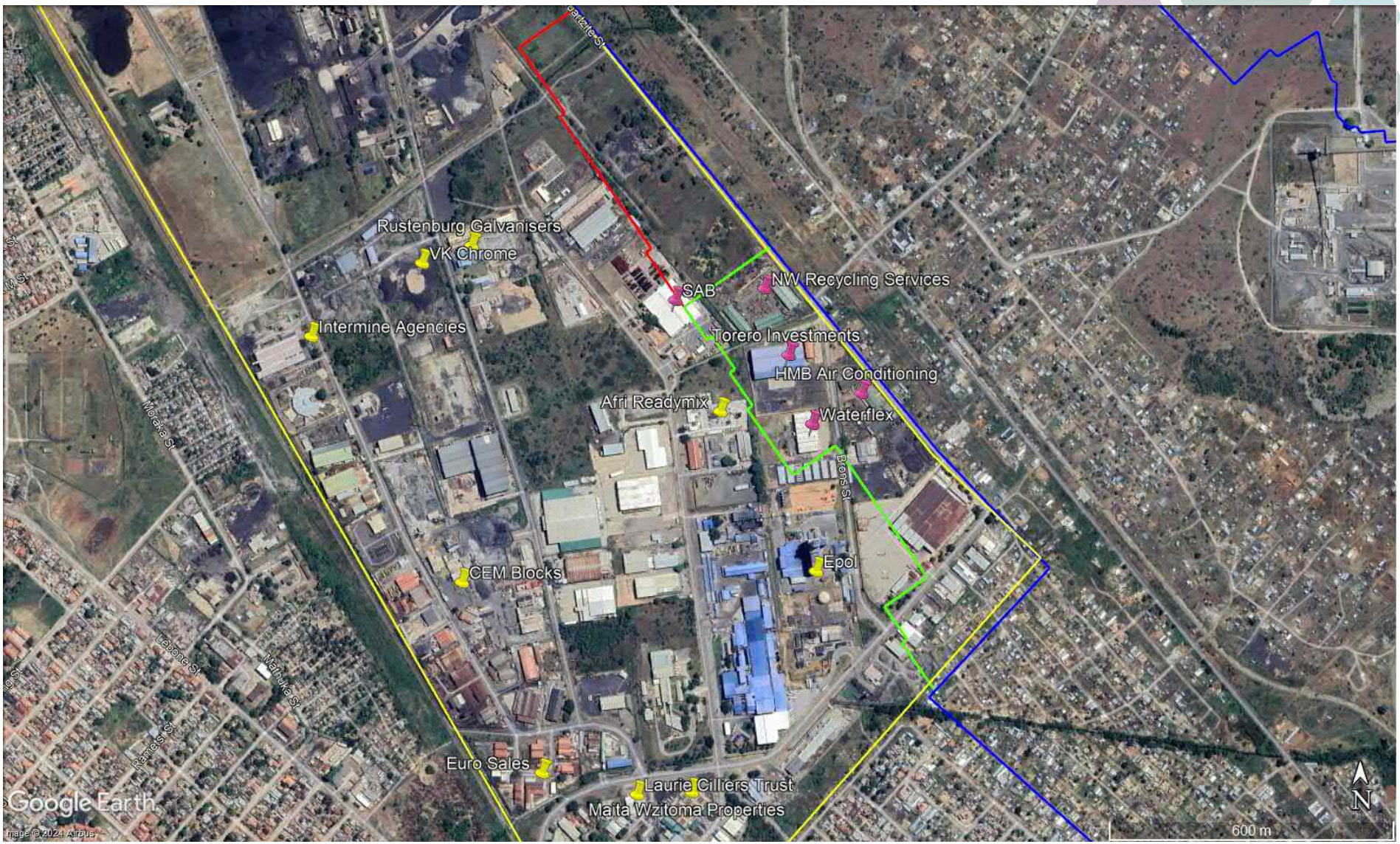
- Placement of Site Notice in and around Project Area
- Distribution of Background Information Documents (BID)
- Placement of Newspaper Advertisement
- Ward Councillors notification
- Notification Letters and Emails to all registered I&AP's
- Maintain an I&AP database
- Availability of the DBAR
  - Rustenburg Local Municipality
  - Kwezi Operations
  - Placement of the DBAR of Ulwazi
- Alta van Dyk Environmental Website: https://altavandykenvironmental.co.za/

Alta van Dyk Environmental

Summary of Comments Received to Date

- Groundwater Quantity
  - Due to the lack of provision of municipal water supply, groundwater is a vital source within the project study area.
  - Shallow mining will have an impact on the groundwater quantity currently available and being used by the respective water users
  - Groundwater is used for potable purposes, sanitation, cleaning, process and operations
- Groundwater Quality
  - Toxic and low pH water as a result of Sulfide minerals present in excavated rocks
  - Naturally occurring heavy metals contained in the rocks have a potential to leach out and carried downstream
  - Chemical agents such as sulphuric acid and Cyanide can leach from the mining site into nearby water bodies and get carried downstream
  - Pollution Plume
- Blast and Vibration
  - Impact and damage to below surface infrastructure eg silo
  - Damage to borehole infrastructure
  - Ground vibration
  - Health and Safety concerns due to the storage of highly flammable liquids
  - Frequent use of the roads on surface by haul trucks
  - Frequent use of industrial vehicles such as a forklifts
  - Cracks on buildings, perimeter walls
  - Stability of a double storey buildings
  - Sensitive electronic equipment managing precision calibrated cutting machines will be affected by blasting tremors
- Property Depreciation
- Impact on Insurance Policies

Properties in Relation to Mining Blocks A & B



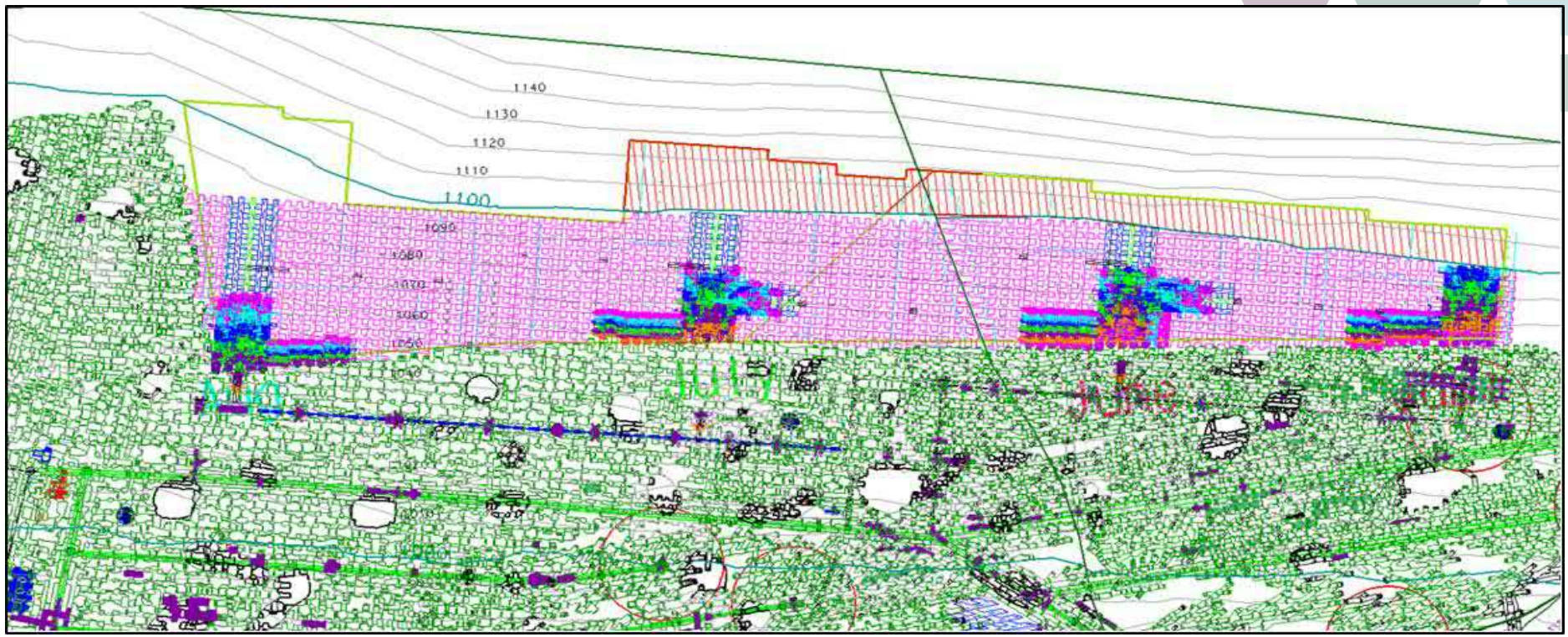
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Specialist Studies

- Wetland Assessment
- Hydropedological Assessment
- Blast and Stability impact assessment
- Geohydrological Impact Assessment
- Heritage Compliance Statement

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Mining Methodology

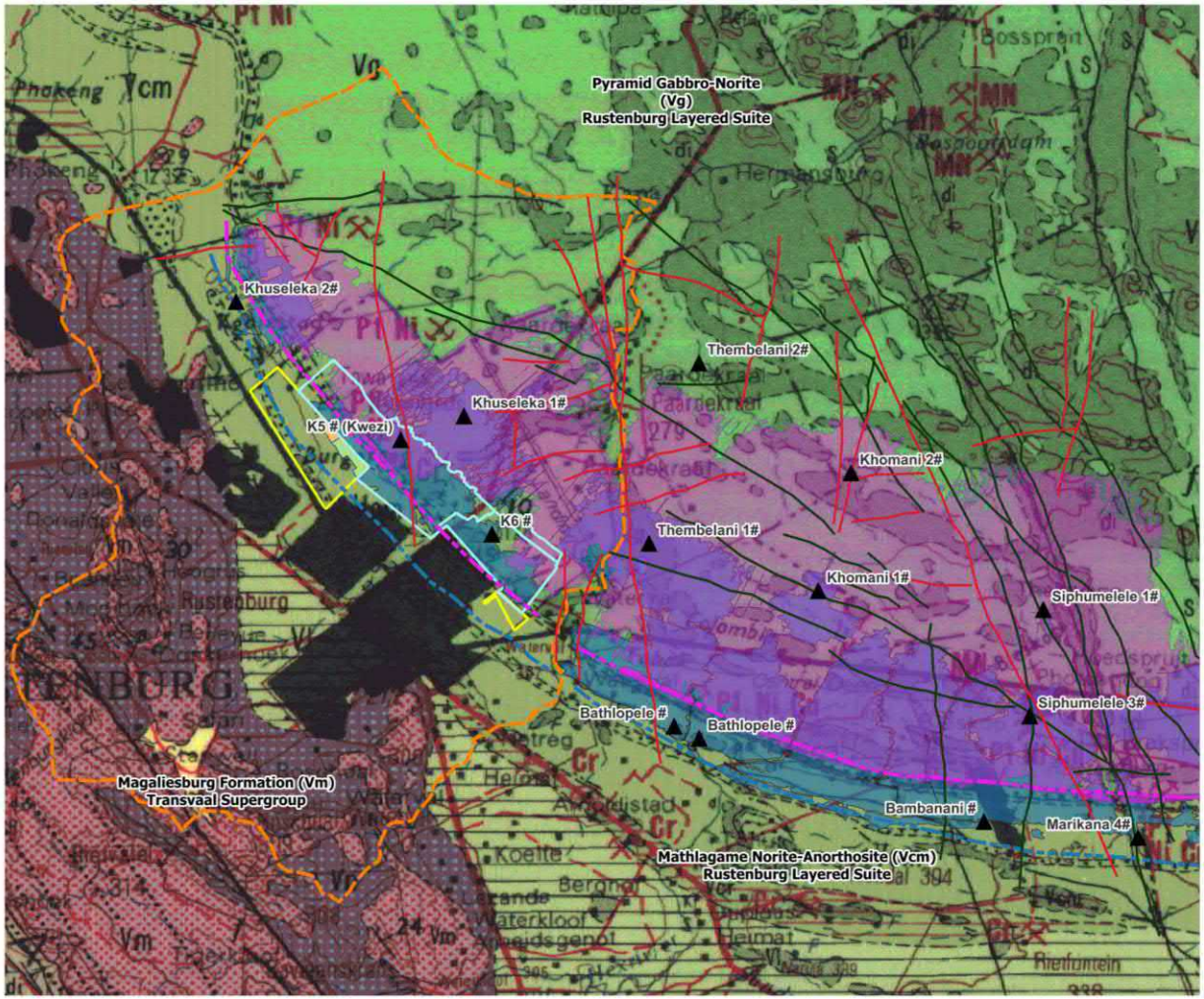


- No mining shallower than 40m –**Crown pillar is 40m below surface**
- Mining span: stable at 6m without support
- Pillar design 8m X 8m; resulting in very stable ground
- **Mining Design- Bord and pillar strike design**
- 8 mining development- convert to stoping upon completion
- 4 crews mining stoping

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Groundwater Impact Assessment

Aquifer Characterisation

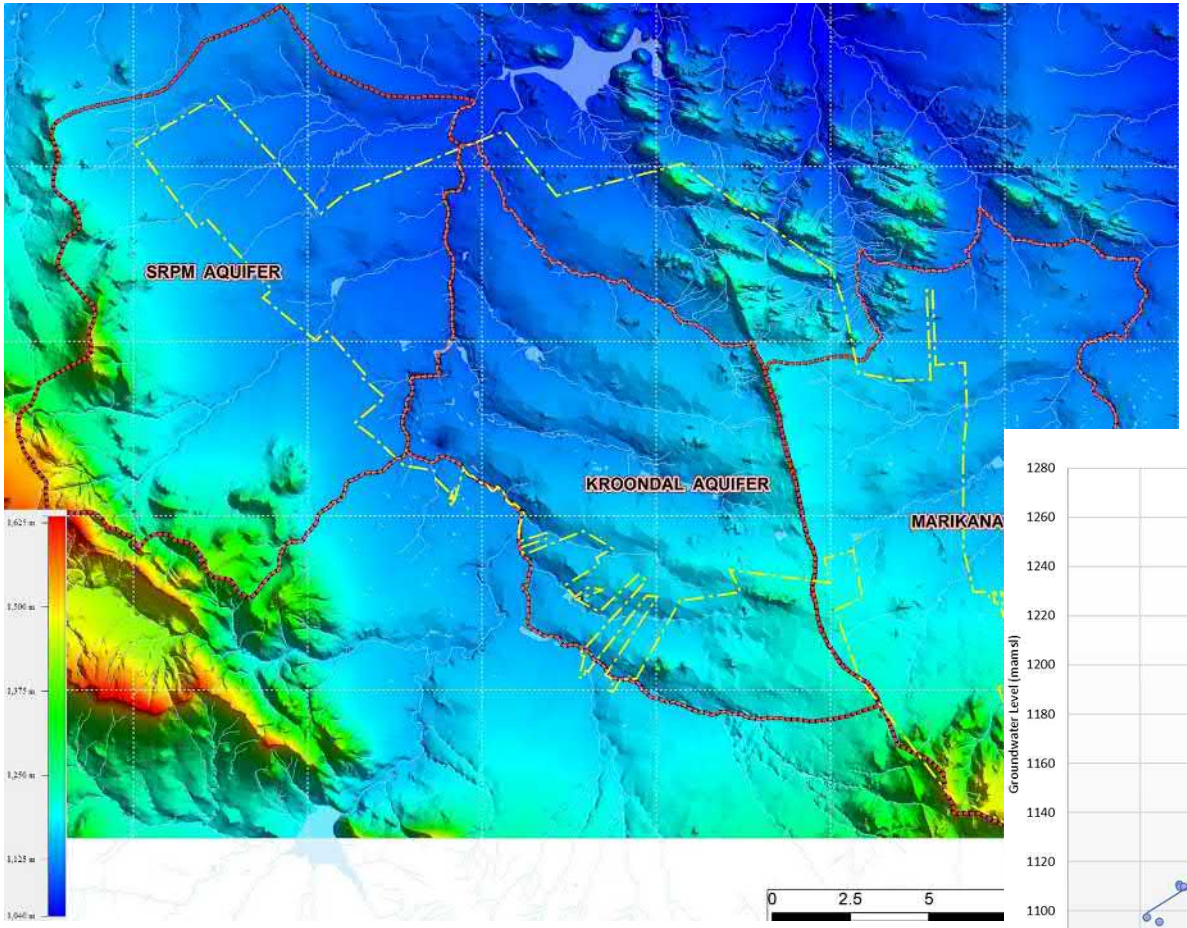


- The geology of the region is dominated by the layered rocks of the Bushveld Igneous Complex (norite)
- Secondary Fractured Aquifer.

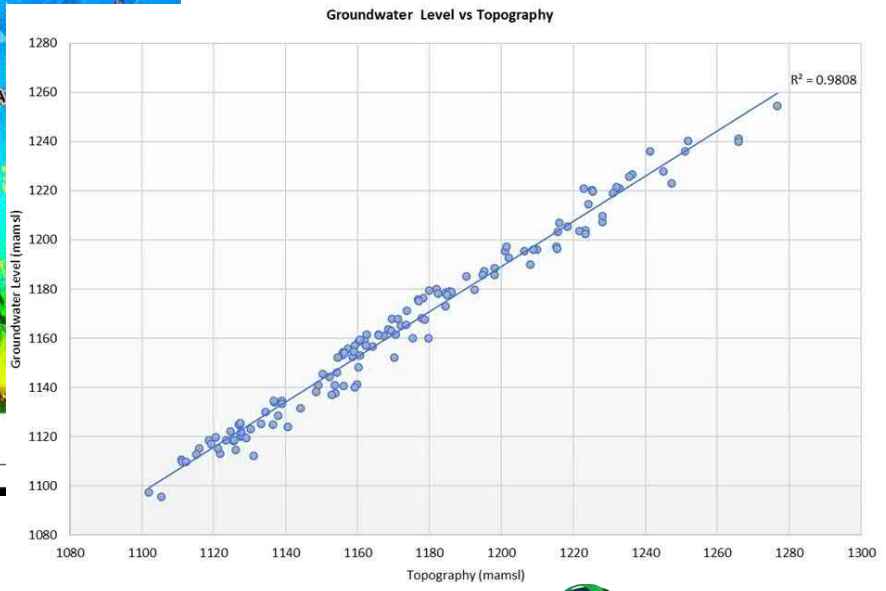
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Groundwater Impact Assessment

Prevailing groundwater conditions



- Groundwater mimics the topography.
- Groundwater flow is towards the surface streams.
- There is no evidence of aquifer dewatering into the current mine workings



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Groundwater Impact Assessment

Hydrocensus



- Groundwater is used extensively
- 25 Private Boreholes identified
- 8 High Risk Boreholes

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Groundwater Impact Assessment

Hydrocensus – Risk Boreholes



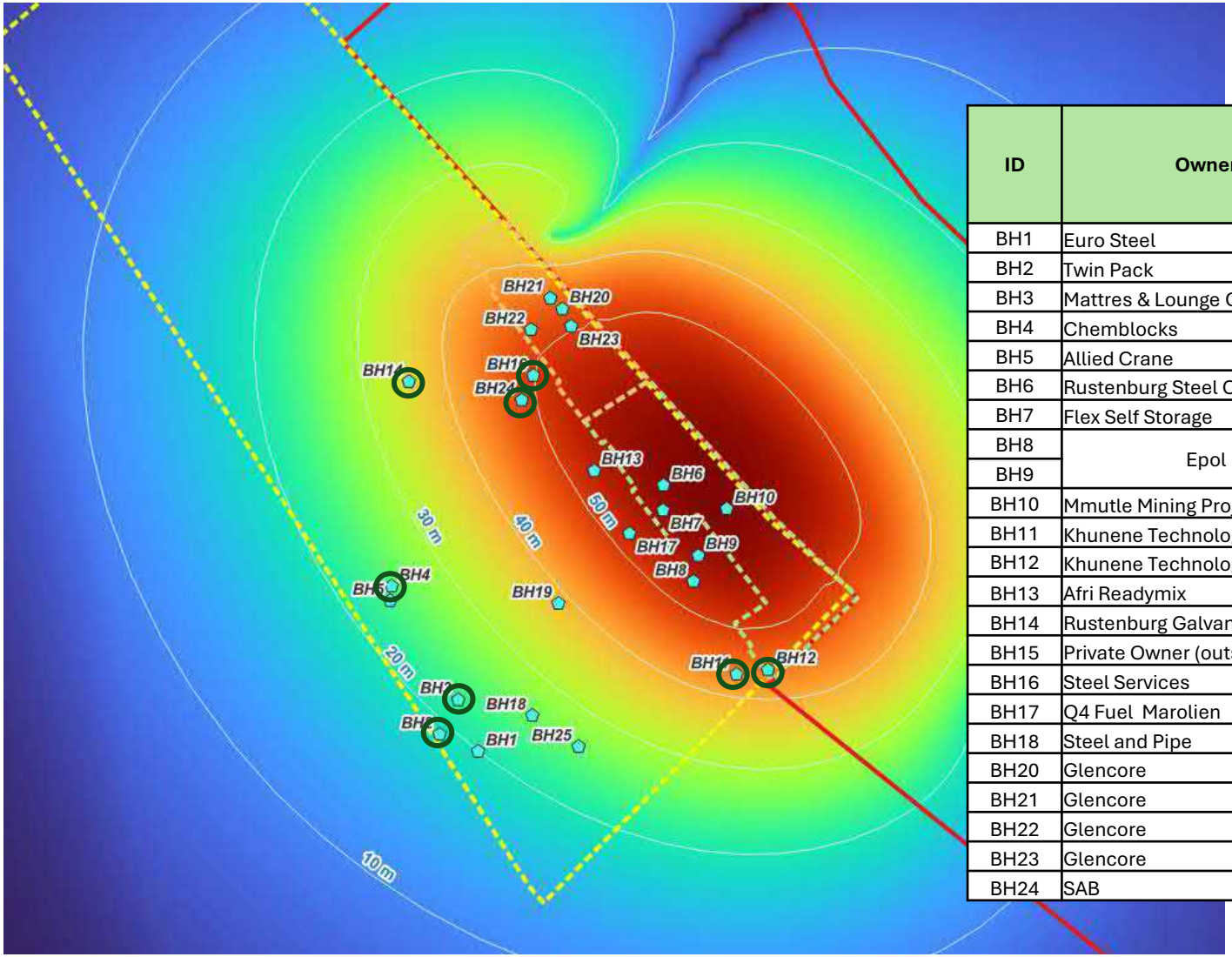
- 8 High Risk Boreholes
- 2 Very High Risk

ID	Owner	Depth	Above/Below Mining
BH6	Rustenburg Steel Construction	46	20
BH7	Flex Self Storage	65	-6
BH10	Mmutle Mining Projects	40	40
BH12	Khunene Technologies	100	-51
BH20	Glencore	30	53
BH21	Glencore	30	50
BH22	Glencore	30	31
BH23	Glencore	30	51

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Groundwater Impact Assessment

Groundwater modelling and Risk Assessment



- Increase in High Risk Boreholes
- 9 Boreholes that are Low to No Risk

ID	Owner	Depth	DD	WL above / below EOH
BH1	Euro Steel	25	20	-9
BH2	Twin Pack	60	19	22
BH3	Mattres & Lounge Corporation	45	22	8
BH4	Chemblocks	45	24	3
BH5	Allied Crane	70	24	-6
BH6	Rustenburg Steel Construction	46	57	-25
BH7	Flex Self Storage	65	57	-3
BH8	Epol	25	54	-33
BH9		25	56	-41
BH10	Mmutle Mining Projects	40	58	-38
BH11	Khunene Technologies	80	43	22
BH12	Khunene Technologies	100	44	40
BH13	Afri Readymix	60	53	-3
BH14	Rustenburg Galvanisers	50	35	6
BH15	Private Owner (outside cone)	50	0	35
BH16	Steel Services	120	50	60
BH17	Q4 Fuel Marolien	45	52	-18
BH18	Steel and Pipe	20	26	-10
BH20	Glencore	30	47	-25
BH21	Glencore	30	45	-23
BH22	Glencore	30	48	-28
BH23	Glencore	30	49	-28
BH24	SAB	70	48	13

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Groundwater Impact Assessment

Groundwater Quality

Groundwater Quality – Mine Monitoring Boreholes

Parameter	RPM WUL 2018	Drinking Water	NBH02	ATG05	ATG01
pH	6-9.5	≥5 to ≤9.7	8.07	7.93	7.25
Electrical Conductivity (EC)	<150	≤170	58	55.8	104
Total Dissolved Solids (TDS)		≤1 200	392	393	677
Alkalinity			208	181	506
Chloride (Cl)	<200	≤300	39	36	49
Sulphate (SO_4)	<200	≤500	45	44	0
Nitrate (NO_3-N)	<10	≤11	5.91	7.42	0.049
Ammonia (NH_4-N)		≤1.5	1	0.746	6.78
Orthophosphate (PO_4-P)			0.04	0.007	0.003
Fluoride (F)	<1	≤1.5	0.28	0.23	0.243
Calcium (Ca)	<150		37	38.1	92.3
Magnesium (Mg)	<100		30.6	32.9	23.1
Sodium (Na)	<200	≤200	36.5	42.3	102
Potassium (K)			0.85	0.699	41.1
Aluminium (Al)		≤0.3	<0.002	<0.002	<0.002
Iron (Fe)		≤2	<0.004	<0.004	<0.004
Manganese (Mn)		≤0.4	<0.001	0.002	0.519
Total Chromium (Cr)		≤0.05	<0.003	<0.003	<0.003
Hexavalent Chromium (Cr^{6+})			<0.002	<0.002	<0.002

- Water quality is good and not concerning

Groundwater Quality – Underground Mine Water

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	6-9.5	≥5 to ≤9.7	7.8
Total Dissolved Solids		≤1 200	740
Calcium	<150		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	<200	≤500	378
Chloride	<200	≤300	41
Nitrate	<10	≤11	0.2
Ammonium		≤1.5	<0.001
Aluminium		≤0.3	<0.001
Iron		≤2	<0.001
Manganese		≤0.4	<0.001
Nickel		≤0.07	0.001
Molybdenum			0.001

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Groundwater Impact Assessment

Mitigation Measures

1. Leaving pillars around the boreholes that were drilled beyond the mining depth
2. Prevent or reduce the inflow of groundwater into the mine (grouting)
3. Replace damaged / dewatered boreholes (Some boreholes could be drilled deeper)
4. Establishment of an environmental monitoring committee
5. Alternative water source (wellfield)

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Vibration and Stability Impact Assessment

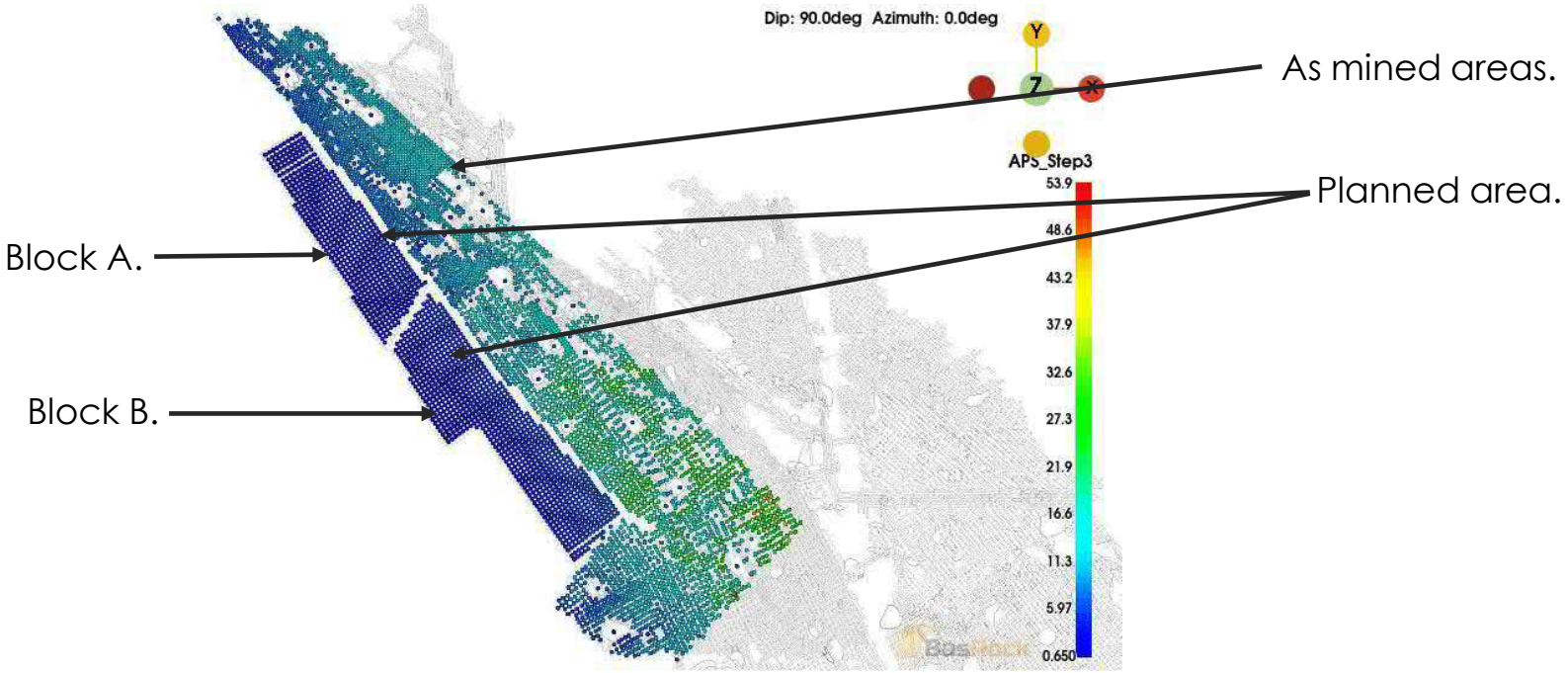
Technical Input Rock Engineering

- Numerical Modelling.
  - Pillar Stability
  - Subsidence
  - Blasting Vibration

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Numerical Modelling - Pillars

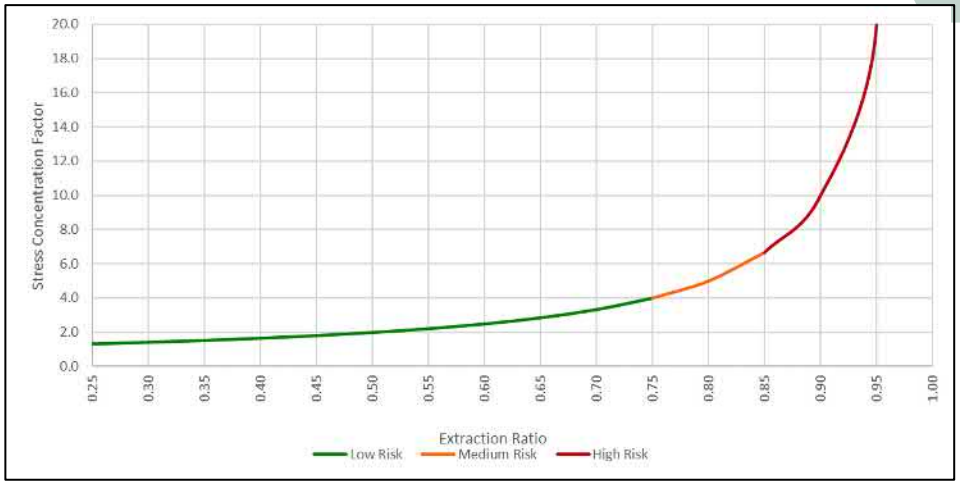
- Average Pillar Stresses (APS) for each individual pillar in the as mined and planned areas.
- Average Pillar stress 5.97 MPa in the area, very low. Pillar failure is unlikely.



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Numerical Modelling - Pillars

- Categorized Risk Classification is the Theoretical Extraction ratio (e) and Stress Concentration Factor SCF for each individual Pillar.





From the Risk Classification the Risk Rating for the proposed pillars are classified as low **The likelihood of having total pillar collapse is low due to high FoS on the Pillars.**

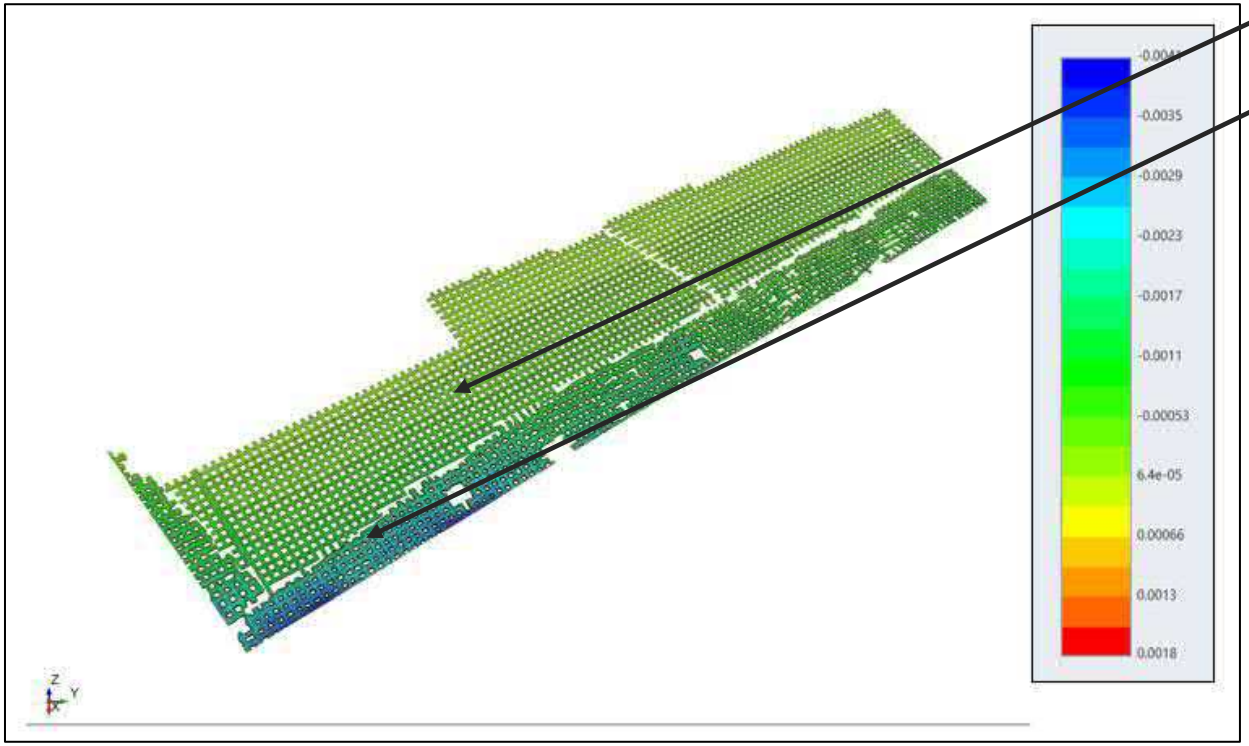
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Numerical Modelling – Schedule Assessment

- Two Methodologies deployed an absolute worst case scenario simulates a complete collapse of the pillar system.
- Second methodology assesses the likely subsidence through 3D modelling looking at expected underground displacements as well as superimposing the surface contours.

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Numerical Modelling – Anticipated Scenario Underground Vertical Dispalcements

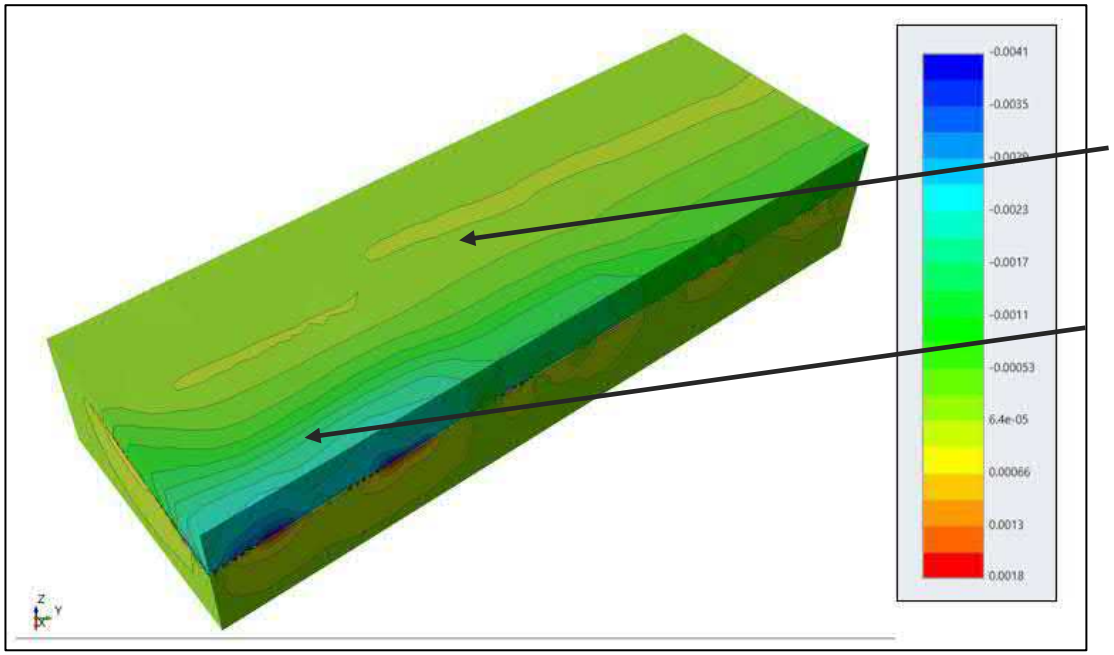


- Maximum vertical displacements underground is expected in the center of the proposed mining.
- Maximum vertical displacements underground at previously mined areas is expected to be 4 mm.

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Numerical Modelling – Anticipated Scenario Surface Vertical Displacements

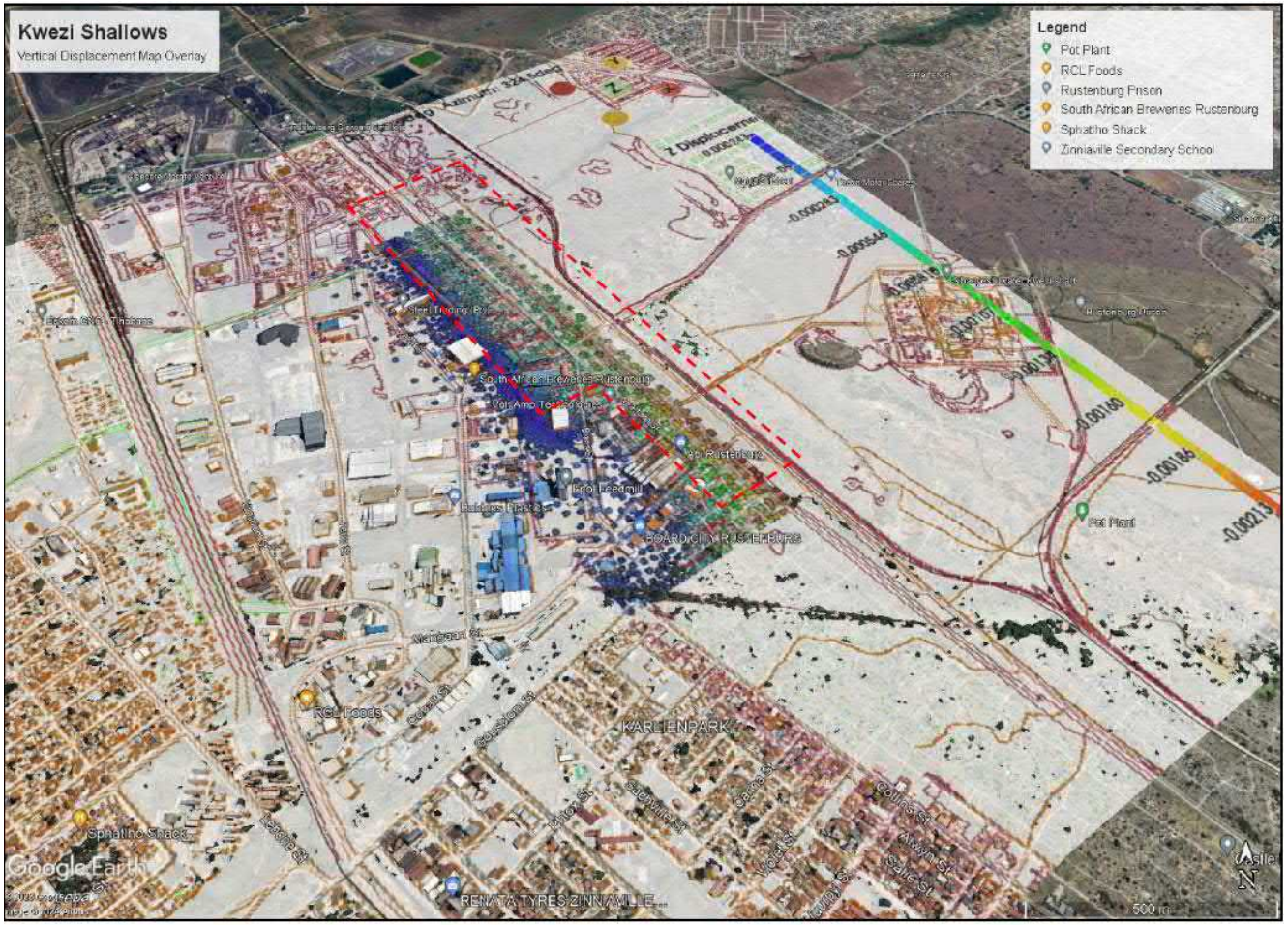
- Two Methodologies deployed an absolute worst case scenario simulates a complete collapse of the pillar system.
- Second methodology assesses the likely subsidence through 3D modelling looking at expected underground displacements as well as superimposing the surface contours.



- Maximum vertical displacements expected on surface < 0.5mm in the shallow areas of the proposed mining.
- Maximum vertical displacements expected on surface from the already mined areas is expected to be 2.5 mm.

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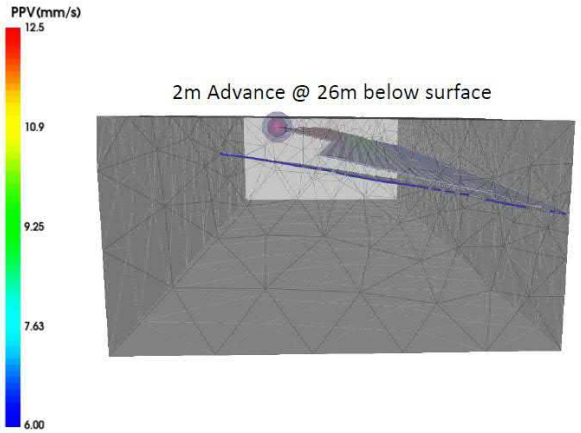
Numerical Modelling – Superimposed Expected Elastic Deformation

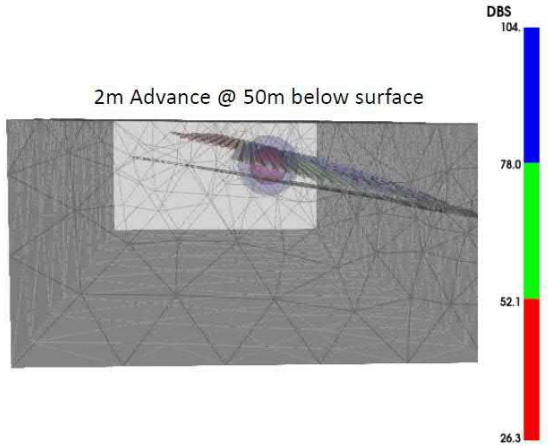


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Numerical Modelling – Blast Vibration Maximum Expected PPV's

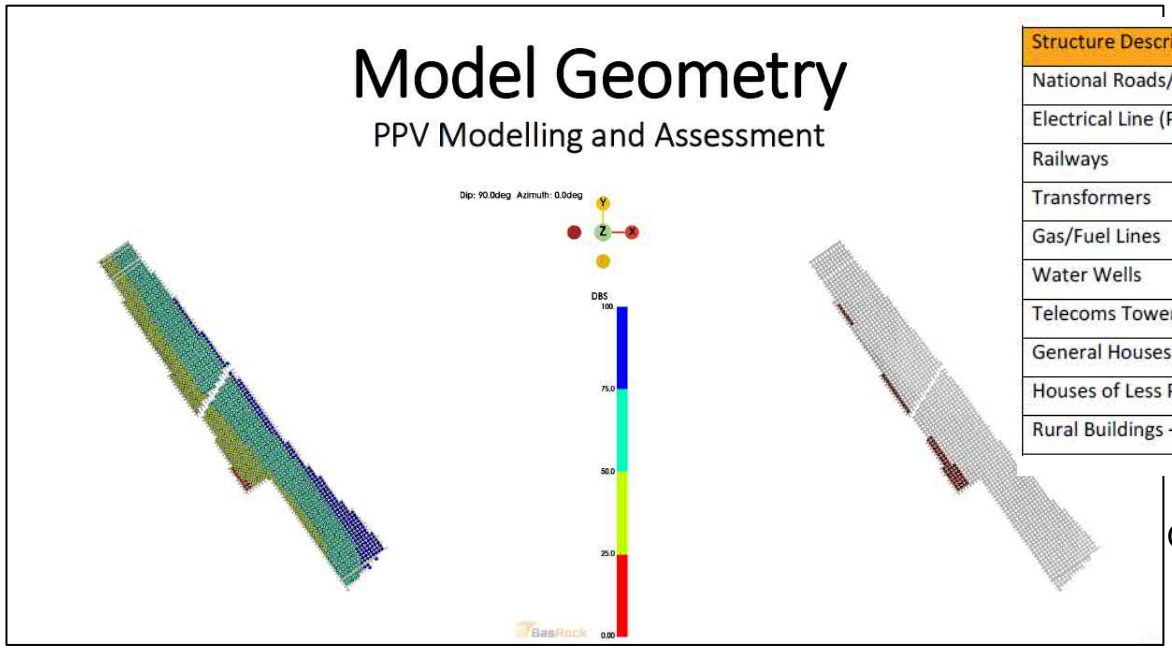
- Assumed a 38 mm diameter blast hole of varying length.
- Assumed an emulsion density of 1000kg/m3.
- Establish blasting advance limitations based on expected PPV and surface infrastructure proximity.
- Numerical model wire frames used to simulate blasts as proposed by analytical equations.
- Two zones delineated for 6mm/sec and 12.5 mm/sec to assess the zone of disturbance.
- Delays between shot holes to be more than 8 milliseconds





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Numerical Modelling – Blast Vibration Modelling Assessment



Structure Description	Ground Vibration Limit (mm/sec)
National Roads/Tar Roads	150
Electrical Line (Pylons)	75
Railways	150
Transformers	25
Gas/Fuel Lines	25
Water Wells	50
Telecoms Tower	50
General Houses of Proper Construction	25
Houses of Less Proper Construction	12.5
Rural Buildings – Mud Houses	6

Ground Vibration Limits as per USBM

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Mitigation Measures– Blast and Vibration Monitoring

- The advance per blast to be limited to 2.0 m for depths < 50 m
- The advance per blast > 50 m can be 3.0 m
- Ground monitoring for ground movement and subsidence will be undertaken
- No mining shallower than 40m



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Discussion and Conclusion

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"……..for the silent ones…."

Project Management, Peer Review, Advisory

Focus Group Meeting

Date: 06 November 2024

The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

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Project Management, Peer Review, Advisory

Date: 06 November 2024

Focus Group Meeting

The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

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Project Management, Peer Review, Advisory

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The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Operations through the Inclusion of the UG Shallows Blocks

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Alta van Dyk Environmental

SIBANYE RUSTENBURG PLATINUM MINES (PTY) Ltd

COMMENTS AND RESPONSE REPORT (CRR): PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

February 2025

PROJECT DETAILS

CLIENT NAME:	SIBANYE RUSTENBURG PLATINUM MINES (PTY LTD)
PROJECT NAME:	PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)
REPORT DETAIL:	COMMENTS AND RESPONSE REPORT (CRR)
ALTA VAN DYK CORPORATE GROUP SUBSIDIARY	ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD
REPORT DATE:	February 2025
VERSION CONTROL:	VERSION 1
MAIN AUTHOR:	KIRTHI PERAMAUL & REATA COLYN
MANAGING DIRECTOR:	REATA COLYN
TECHNICAL DIRECTOR:	ALTA VAN DYK

The opinions expressed in this Report have been based on the information supplied to Alta van Dyk Environmental (Pty) Ltd ("AvDE"), a subsidiary of Alta van Dyk Corporate Group ("AvDCG"), by company officials. The opinions in this Report are provided in response to a specific request from company officials to do so. AvDCG has exercised all due care in reviewing the supplied information. Whilst AvDCG has compared key supplied data with expected values, the accuracy of the results and conclusions from the review is entirely reliant on the accuracy and completeness of the supplied data. AvDCG does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features as they existed at the time of AvDCG's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which AvDCG had no prior knowledge nor had the opportunity to evaluate.

APPROVED BY:	REATA COLYN
SIGNATURE:	

1. INTRODUCTION

This Comments and Responses Report (CRR) captures the comments and issues raised by Interested and Affected Parties (I&APs) during the pre-application engagement and the Draft Basic Assessment Phase for the proposed project.

This is a dynamic document and was continuously updated during the key stages of the Basic Assessment Process to report back on methods of notification, comments raised, and the responses provided.

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

Table 1 and Table 2 indicates the name of the I&AP, their organization, the date of the receipt of the comments, their communication methods well as the response of Alta van Dyk Environmental Consultants (Pty) Ltd to the comment. This report contains all comments that have been received to date on the project.

TABLE 1: PRE-CONSULTATION COMMENTS AND RESPONSES

Nr.	Organisation/Commentator	Comment	Date	Source	Response
Pre-Consultation					
1	Rustenburg Galvanizers Dr Dirk Odendaal	Please involve us we are dependent on water for our factory. We do not have municipal water and is dependent on a borehole. Your proposed activities may result in this ending up with no borehole water which will be detrimental to our business.	7 October 2024	Email	The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. The borehole situated on the premises as referenced in the Groundwater report is BH14. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. Monitoring will nevertheless be conducted to confirm any changes in the groundwater levels and if it does occur an alternative source of supply will be provided by Sibanye Stillwater. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. It should be noted that five monitoring boreholes have been identified in the zone of influence, that will be monitored both for a drop in the water level as well as water quality changes. During the hydro census, it was noted that the actual use of Rustenburg Galvanizers was not recorded. It is therefore recommended as a potential impacted water user, that Rustenburg Galvanisers monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It is therefore recommended that Rustenburg Galvanisers confirm their current demand and keep a full record of use, and this must form part of the reporting to the Environmental Monitoring Committee. It is also recommended that each water user indicate demand and keep record of actual use prior to mining commencement as users may already exceed the reasonable domestic use criteria to be licenced/registered with the Department of Water and Sanitation.
2	SA Breweries Miles Saxby	Reliant on groundwater (Sanitation, cleaning and potable purposes) Ground vibration ensures blasting (Storage of Alcohol on-site- highly flammable, adjacent road frequently used by the trucks)	7 October 2024	Teams Meeting	**<u>Groundwater</u>** A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report (Appendix 3). The borehole situated on the premises as referenced in the Groundwater report is BH24. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. A monitoring and manage plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners as discussed during the focus group landowners meeting. **<u>Ground Vibration</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures using drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPVs is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					In terms of the Ground Vibration Standards as per the USBM, for rural buildings -and mud houses a ground vibration limit of 6 mm/sec has been assigned. The Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below 6 mm/sec which is 2 mm/sec. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
3	Waterflex (Pty) Ltd Authur Cockcroft	Shallow mining is going to cut off our water source (borehole). Shallow mines can damage buildings in the short and long term and guarantees in the form of trusts may need to be rendered. The guaranteed term must extend over a 50-to-100-year period. The guarantee must be such that if the company (assumed SS) becomes insolvent or is alienated sufficient funds will be available for damages	4 October 2024	Email	**<u>Groundwater</u>** The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. According to the Geohydrological assessment undertaken, the borehole as referred to as borehole BH7 falls inside the mining blocks and is therefore considered to be at risk. Groundwater modelling has indicated that in the worst-case scenario, the borehole might dry up. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners as discussed during the focus group landowners meeting. It should be noted that five monitoring boreholes have been identified in the zone of influence, that will be monitored both for a drop in the water level as well as water quality changes. During the hydrocensus, it was noted that the actual use by Waterflex was indicated as 10m3/day. It is recommended as a potential impacted water user, that Waterflex monitor their actual abstraction volumes to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, some existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It must be noted that water users who exceed the reasonable domestic use criteria, license/register their use with the Department of Water and Sanitation. In terms of protection of boreholes, pillars would be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period **<u>Blast and Vibration</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures using drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPVs is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -and mud houses a ground vibration limit of 6 mm/sec has been assigned. The Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
		You're writing about a shallow mine under our premises erf 2258 RUSTENBURG UITB. 9 I wish to object to it to sign. We have a borehole from which water is extracted for bottling. What guarantees do we have that our buildings won't crack or collapse over the long term? Mine under our premises will pollute or destroy our water source. Damage prevention to buildings must be guaranteed in such a way that it will cover 100% of damage or buyout. Your attention to this objection would be highly appreciated.	11 September 2024	Email/Telephonic	
4	Afri Readymix Gerhardus Maree	My business is dependent on the supply of water through the borehole and my concern is that mining activities will destroy the boreholes. Rustenburg Local Municipality water is unreliable. There was no supply for 6 months	4 October 2024	Email	The potential risk to the groundwater supply is noted.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report (Appendix 3). The borehole situated on the premises as referenced in the Groundwater report is BH13. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. Monitoring will nevertheless be conducted to confirm any changes in the groundwater levels and if it does occur an alternative source of supply will be provided by Sibanye Stillwater. A monitoring and manage plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners as discussed during the focus group landowners meeting. It should be noted that five monitoring boreholes have been identified in the zone of influence, that will be monitored both for a drop in the water level as well as water quality changes. During the hydrocensus, it was noted that the actual use by Afri Ready mix were indicated as 16m3/day. It is recommended as a potential impacted water user, that Afri Ready Mix monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental monitoring committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, some existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It must be noted that water users that exceed the reasonable domestic use criteria, licence/register their use with the Department of Water and Sanitation.
5	HMB Air Conditioning Mr Herman Brand	We are in the process of drilling for water. Our insurance will not cover us if this is approved. Our water will not be usable if the project is approved. Our eight tenants will move from our premises. The premises will no longer be safe with drilling underground at 40m.	4 October 2024	Email	**<u>Boreholes</u>** A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The site overlies the mining blocks, and any borehole may therefore be at risk of drying up over time. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. It should be noted that five monitoring boreholes have been identified in the zone of influence, which will be monitored both for a drop in the water level as well as water quality changes. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee to increase the confidence levels of the hydrogeological model. Apart from mining, some existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It must be noted that water users who exceed the reasonable domestic use criteria, license/register their use with the Department of Water and Sanitation. In terms of protection of boreholes, pillars would be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period **<u>Blast and Vibration</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPVs is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting. **Insurance** Sibanye-Stillwater will be engaging with the various insurance companies to discuss this matter. The outcomes will be communicated with the concerned landowners.
6	NW Recycling Services Braam Du Toit	NW Recycling Services premises seem to be right above where blocks A and B join. 1. The boreholes on site. 2. The buildings of which are the administration offices are a double story. 3. The brick wall perimeter. 4. The inside surface premises of the operations consists of normal paving bricks and an approximate 300mm reinforced concrete slab. 5. How these operations affect the future financial value of the property.	19 September 2024	Email	A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water (Appendix 3). The borehole on this property was not recorded during the hydrocensus, but the site overlies the mining blocks, and any borehole may therefore be at risk of drying up over time. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as** discussed during the focus group landowners meeting. It should be noted that five monitoring boreholes have been identified in the zone of influence, which will be monitored both for a drop in the water level as well as water quality changes. The actual use of NW Recycling was not recorded. It is therefore recommended as a potential impacted water user, that NW Recycling monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It is therefore recommended that NW Recycling confirm their current demand and keep full record of use, and this must form part of the reporting to the Environmental Monitoring Committee. It is also recommended that each water user indicate demand and keep record of actual use prior to mining commencement as users may already exceed the reasonable domestic use criteria to be licenced/registered with the Department of Water and Sanitation. **Blast and Vibration (Property depreciation)** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical

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					calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting. <u>Draft Basic Assessment Report Phase Response</u> Three boreholes were identified on the 20th January 2025 at the NW Recycling Premises. There are two production boreholes and one monitoring borehole. Pump tests were undertaken on the production borehole. The boreholes fall within the mining limit. A 5m protection pillar will be left around the borehole to safeguard the borehole. *Management and Monitoring Plan* The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision, the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis. The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives. The WUL application is a parallel process also been undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance.
7	Nicolas Eleftheriades	I would like to register an Interested and Affected Party	13 September 2024	Email	Thank you for your email. You have been registered as an Interested and Affected Party and your details have been included on the Stakeholder Database. Attached is the Background Information Document for the proposed project. Alta van Dyk Environmental Consultants are busy with the compilation of the Draft Basic Assessment Report. You will be informed of the availability of the Draft Basic Assessment Report and provided with details in terms of where and how the report can be accessed.
8	Torero Investments 6 (Pty) Ltd Mr Naas van Rooyen	Portion 0 of Stand 2257, the owners of this stand object against mining operations beneath this stand for the following reasons: • Sensitive electronic equipment managing precision calibrated cutting machines will be affected by blasting tremors • Current water supply through a borehole will be affected	16 September 2024	Email	**<u>Groundwater</u>** The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. According to the Geohydrological assessment undertaken, the borehole as referred to as borehole BH6 falls inside the mining blocks and is therefore considered to be at risk. Groundwater modelling has indicated that in the worst-case scenario, the borehole might dry up. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. It should be noted that five monitoring boreholes have been identified in the zone of influence, which will be monitored both for a drop in the water level as well as water quality changes. During the hydrocensus, it was noted that the actual use by Rustenburg Steel Construction was indicated as 10m3/day. It is recommended as a potential impacted water user, that Rustenburg Steel Construction monitor their actual abstraction volumes to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					Apart from mining, some existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It must be noted that water users who exceed the reasonable domestic use criteria, license/register their use with the Department of Water and Sanitation. In terms of protection to boreholes, pillars would be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period. **Vibration** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -and mud houses a ground vibration limit of 6 mm/sec has been assigned. The Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting. Draft Basic Assessment Response In addition to the response above, it is important to note that the project team will be responding to each I&AP rather than a Focus Group Meeting. Sibanye Stillwater is committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because as a company they want to remain true to their values. There will an environmental monitoring committee established involving I&APS and SRPM representatives as part of the monitoring and management process as defined in the Environmental Monitoring and Management plan. Groundwater/boreholes A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. The borehole situated on the premises as referenced in the Groundwater report is BH6. A cross section of the borehole in relation to the mining limit has been provided as part of this response. The borehole length was noted to be 46m. The horizontal distance from BH06 to outside the mining limit is 2m. No mining will be undertaken below BH06. A 5m protection pillar will be left around the borehole to safeguard the borehole. SRPM has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense.
9	Euro Sales Mrs Ansia Euler	Industrial area Ext 6 seldom has water, municipal water is very unreliable, we rely on borehole water for supply, and we assist our neighbours with water. We cannot afford to lose our water supply (borehole) due to mining activities.	16 September 2024	Email	The potential risk to the groundwater supply is noted. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as** discussed during the focus group landowners meeting.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
10	Florence Mokhooa	My name is Florence Mokhooa, I am residing at the informal settlement next to Kwezi Shaft near Nkandla. Could you please send me further information regarding the proposed project in the attached document? On behalf of the community, I am asking if we can create a register (to be signed by community members) as I&AP or every member of the community can contact you.? Kindly share information in ENGLISH PLEASE.	7 September 2024	Email	Thank you very much for your email. You have been registered as an Interested and Affected Party and your details has been included on the Stakeholder Database. Attached is the Background Information Document for the proposed project. Kindly compile the register and send it through to Alta van Dyk Environmental Consultants. We will then capture the details of the community members on the Stakeholder Database as registered Interested and Affected parties. This will allow them to be informed on any developments on the proposed project. Please include the following on the register: 1. Name and Surname 2. Address 3. Email Address 4. Cell phone number
11	Olebogeng Tlapu	My name is Olebogeng Tlapu one of the community members living close or per se on the farm that the mine is proposing to do some extension as a concerned citizen I would like to have more information about this project. I hereby request a copy of the background information. Hoping my humble request will be considered	7 September 2024	Email	Thank you very much for your email. You have been registered as an Interested and Affected Party and your details have been included on the Stakeholder Database. Attached is the Background Information Document for the proposed project. Thank you for your participation
12	Cemblocks Mr Francois Alberts	Please send the full details of the scope and register me as an interested and affected party Are there already states set up for a meeting?	30 September 2024	Email	Thank you for your email. Attached to this email is a Background Information Document which provides details of the proposed project. You have been registered as an Interested and Affected Party and your details have been included on the Stakeholder Database you will receive details of the project as it develops. At this stage there is no meeting planned for the project, however, kindly send through all comments to Alta van Dyk Environmental, whereby the project team can respond to them.
13	Epol Joachim Prinsloo	We are concerned about this development. The Epol plant is going 12 m into the ground and has a silo area of 40 x 20 m with a 32 x 500-ton silo, bearing down on the surface, the structure was not designed with this in consideration. We also extract water from underground to substitute Municipal water.	01 October 2024	Email	<u>Groundwater</u> The potential risk to the groundwater supply is noted. The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. The borehole situated on the premises as referenced in the Groundwater report is BH 8 and BH9. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. Monitoring will nevertheless be conducted to confirm any changes in the groundwater levels and if it does occur an alternative source of supply will be provided by Sibanye Stillwater. A monitoring and management plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. It should be noted that five monitoring boreholes have been identified in the zone of influence, which will be monitored both for a drop in the water level as well as water quality changes. During the hydrocensus, it was noted that the actual use of boreholes was not recorded. It is therefore recommended that a potential impacted water user, monitor their actual abstraction volumes to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It is therefore recommended that Epol confirm their current demand and keep full record of use, and this must form part of the reporting to the Environmental Monitoring committee.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					It is also recommended that each water user indicate demand and keep record of actual use prior to mining commencement as users may already exceed the reasonable domestic use criteria to be licenced/registered with the Department of Water and Sanitation. **<u>Vibration and Stability</u>** Undermining the Epol factory will not take place. The mine plan has been designed with consideration to the Epol factory. A bracket pillar was left between the mining limit and Epol to ensure no undermining happens below the Epol factory over and above blasting and vibration study recommendations A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
14	VK Chrome Processing (Pty) Ltd	We are in the process of applying for our own water rights. The intended mining activities will affect our water use. We need the water to produce. We have tall structures. The blasting processes to be undertaken will not affect the integrity of our structures.	10 October 2024	Email	**<u>Groundwater</u>** The potential risk to the groundwater supply is noted. The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. This premises falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the boreholes on site will not dry up. Monitoring will nevertheless be conducted to confirm any changes in the groundwater levels and if it does occur an alternative source of supply will be provided by Sibanye Stillwater. A monitoring and manage plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. It should be noted that five monitoring boreholes have been identified in the zone of influence, that will be monitored both for a drop in the water level as well as water quality changes. It is recommended as a potential impacted water user, monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental monitoring committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. It is therefore recommended that VK Chrome confirm their current demand and keep full record of use, and this must form part of the reporting to the Environmental Monitoring committee. It is also recommended that each water user indicate demand and keep record of actual use prior to mining commencement as users may already exceed the reasonable domestic use criteria to be licenced/registered with the Department of Water and Sanitation.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					<u>Vibration and Stability</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
15	Intermine Agencies Coen Botha	I am the owner of the above (23 A Hefer Street, East End) and concerned about the blasting and mining in our area for damage to structures and borehole due to ground movement.	8 October 2024	Email	**<u>Vibration and Stability</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec In addition to the above, live monitoring of all blasting activities would be conducted to monitor compliance. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
16	Maita Wzitoma Properties (Pty) Ltd	Please register us as an affected party. Owners: Erf 2447 Portion 60. 10A Mangaan Street Rustenburg, 0299.	10 October 2024	Email	Thank you, your email dated 10 October 2024 has been received by Alta van Dyk Environmental. You have been registered as an interested and affected party and your details included on the project database.
17	DupWest Inc. (Du Plessis & Van der Westhuizen Attorneys)	Dear Sir/Madam <u>OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK RUSTENBURG LOCAL MUNICIPALITY NORTHWEST PROVINCE</u> <u>OUR CLIENT: LAURIE CILLIERS TRUST AND A D CILLIERS FAMILY TRUST</u> We refer to the above matter and confirm that we act on behalf of the Trustees of the Laurie Ciliiers Trust (IT: 1327/1984) and the A D Ciliiers Family Trust (IT: 861/2002). Our clients are respectively the registered owners of the following properties: a. Section number 1 in the Glenlore Scheme situated at Portion 37 of Erf 2447, Rustenburg Extension 9 Township; b. Section number 3 in the Glenlore Scheme situated at Portion 37 of Erf 2447, Rustenburg Extension 9 Township.	17 October 2024	Email	Your objection has been noted by the project team and has been included in the Basic Assessment report, which will be submitted to the DMRE for consideration in the decision-making process. A per the mine layout plan, Portion 37 of 2447 is situated approximately 614m from mining Block B. The property is not situated within the proposed mining blocks. A monitoring and manage plan will be compiled by Sibanye Stillwater and agreed upon by the impacted landowners **as discussed during the focus group landowners meeting**. <u>Vibration and Stability</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. In South Africa, guidelines in terms of maximum allowable PPV's is not readily available and thus, the guidelines set out by the United States Bureau of Mines (USBM) are typically used.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		It should be noted that our clients' properties are situated at the identified Block B area situated directly above the target UG2 mineral deposit. Our instructions are to object on behalf of our clients to the approval of the application for the proposed amendment of the mining right as detailed in your letter dated 30 September 2024, read with the draft BAR. The properties of our clients are developed and utilised for commercial purposes in that buildings situated at the properties are leased out for use as a warehouse and shops. The shops are used by members of the public on a daily basis. It is reasonably apprehended that the intended underground mining activities, with inter alia associated blasting, drilling and the depositing of dust, could cause damage to our clients' property and be a risk to the safety of our clients' representatives and members of the public. The proposed extended mining operations may cause many adverse impacts on the environment due to the extractive nature of the operations. Water Quality is affected by: • Sulphide minerals present in excavated rocks which are present in large quantities interact with oxygen and water to form acids. Due to these acids in water the pH of water is reduced and as it flows it dissolves more and more metals in it resulting in a very toxic and low pH water. • Naturally occurring heavy metals often get released in to the mineral extraction process. Metals like Co, As, Cd, Hg, Cu, Pb, Zn etc. are contained in the rock may leach out and get carried downstream by water. • Chemical agents like CN and H2S04 from the mining site get spilled, leached or leaked into nearby water bodies, including underground water. It is common cause that the Rustenburg Local Municipality has experienced severe shortages in water supply. The proposed extended mining will increase the demand for water supply in the Rustenburg area to the detriment of the residents.			<u>Dust</u> The application is in support of underground mining and no additional sources of dust generation will be initiated. No processing activities form part of this application. Ore will be hauled via the existing rail network to the Kroondal Concentrators. Residential and industrial dust monitoring is currently taking place as per the current dust monitoring plans. <u>Water Quality</u> The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report (Appendix). Geochemical studies done by independent consultants have shown that the rock is not Acid Forming and the risk for leaching metals is therefore very low. The expected water quality of water that will accumulate in the mine after closure is also very good and none of the parameters exceed the drinking water limits. The geochemical assessments are included in the geohydrological report. Sibanye-Stillwater is working on a Monitoring and Management plan as discussed during the Landowners Focus Group Meeting.
18	Ruscon Investments Wouter van Der Westhuizen	Thank you for confirming our registration as an affected party. Your reply on the 10th of October 2024 below has reference. We would like to register the fact that our property has a 55m deep borehole, drilled in 2022 at a very high cost. The reason for the borehole is because of the Rustenburg Local Municipality's inability to deliver water to any of the businesses in the mentioned Extension 9 area. We have just been notified that some of the business in our adjacent area have been visited by your staff to assess their boreholes. We have not had any such visits. If this needs to be registered as part of being an affected party, then please consider it registered under our name with immediate effect. Our property hosts 12 tenants in the building, of which one is a bulk butchery. This tenant must, according to health and safety laws, flush all equipment and floors daily for hygienic purposes. Other tenants make use of water to test water pumps for the mines and require bulk water daily. Should your proposed 40m deep excavations and planned bulk usage of the water reserves in our area affect our borehole, we will be forced to take immediate action should our borehole water be affected in any way – in quality and or quantity. The water is of critical importance to our tenants, their staff, business activities and general daily hygiene.	28 October 2024	Email	The potential risk to the groundwater supply is noted. This borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the worst-case scenario the borehole will not dry up. Monitoring will nevertheless be conducted to confirm any changes in the groundwater levels and if it does occur an alternative will be provided.

TABLE 2: DRAFT BASIC ASSESSMENT REPORT PHASE

Nr.	Organisation/Commentator	Comment	Date	Source	Response
Commentary Authorities					
1	South African Heritage Resources Agency	The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr: • 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development; • 38(4)b – The recommendations of the heritage specialists are supported and must be adhered to. In addition, a Chance Find Procedure should be implemented for the project. • 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (bmotsodisa@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule. • 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (bmotsodsa@sahra.org.za) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with a section of the NHRA is an offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule; • 38(4)d – See section 51(1) of the NHRA regarding offences; • 38(4)e – The following conditions apply regarding the appointment of specialists: • If heritage resources are uncovered during the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA; • The Final BAR and EMPr must be submitted to the SAHRIS application for record purposes; • The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.	**3 December 2024**	Email	The comments provided has been acknowledged by Alta van Dyk Environmental and included in the EMPr. Once the FBAR has been submitted to the DMRE for decision making purposes the report will be submitted on SAHRIS. The mitigation measures as provided by the Heritage specialist in the Heritage Impact Assessment has been included in the Final Basic Assessment Report and Environmental; Management Programme. Should heritage resources be uncovered the applicant will implement the chance find procedure and appoint a Heritage Specialist to further investigate the findings.
2	Rustenburg Local Municipality	The Directorate of Community Development within the Rustenburg Local Municipality (Unit: Integrated Environmental Management) acknowledges the receipt of the Basic Assessment for the proposed amendment of mining rights and the expansion of the Kwezi Mining operations through the inclusion of the UG shallows blocks (A & B). The proposed project is for the expansion of the existing underground mining area at the Kwezi shaft. Sibanye Rustenburg Platinum Mines (SRPM) intends to expand the Mining Right Area, through the incorporation of an area over a portion of the remainder of Portion I and portion 127 (now known as Rustenburg Ext. 9) of the farm Rustenburg Town and Townlands 272 JQ. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi shaft. The proposed Block A will cover an area of approximately 14 hectares and Block B comprise approximately 22 hectares and the depth of the UG2 in both Blocks ranges between 40111 and 80111. The proposed mining method that will be undertaken is the room and pillar mining method using mechanized mining. The Kwezi Shaft is currently operational with the ore being hauled for processing to the Kroondal concentrators via an existing surface rail network. No new infrastructure will be required as the existing surface infrastructure at the Kwezi shaft will be utilised to access the Blocks (A & B). The proposed development is listed in terms of the National Environmental Management Act, (NEMA, Act 107 of 1998), 07 April 2017, as amended. The development triggered Regulation GNR. 326, Listing Notice 1 (GN R 327) Activity 21D: *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, required for such amendment.* Listing Notice I, Activity 34: *The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution.* During the site inspection undertaken by the Unit:	**26 November 2024**	Email	<u>Implementation of the mitigation measures as detailed in the Draft Report</u> The mitigation measures included in the Basic Assessment Report (BAR) have been included in the Environmental Management Programme. Should the project receive a positive decision from the DMPR, the BAR and the EMPr are approved by the DMPR and serve as legally binding document together with the site-specific conditions set forth in the Environmental Authorisation. The site is further audited by the DMPR through performance assessments that are undertaken at intervals as stipulated by the DMPR. A Water Use License application is underway with the Department of Water and Sanitation. The WUL when issued by the Department of Water and Sanitation comes with its own conditions that needs to be adhered to by the applicant. This includes monitoring frequencies, parameters, and auditing requirements. <u>Environmental awareness training and availability of the EMPr</u> The EMPr will be available on site. Environmental awareness training will be undertaken for all employees, new recruits, Contractors and visitors to ensure that they are informed on all the procedures and best practice regarding the environmental management on site. Proof of such training will be kept and provided as evidence as part of the performance assessment. <u>Waste Rock Material</u> According to the mine plan, the waste rock generated during the proposed mining of the UG2 Shallows mineral deposit will consist of lumps greater than 34 mm. This will be the rejected waste rock that did not go through the tip grizzly apertures. The oversized waste rock will then be packed in designated scalping lines as per the design. Waste Rock will not be brought to the surface but will rather remain below ground to support rehabilitation and stability purposes (backfilling) <u>Land subsidence and sink holes</u>

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		Integrated Environmental Management, the Environmental Assessment Practitioner (EAP) and Sibanye Stillwater Rustenburg Platinum Mine, the following were noted: • The proposed site is highly developed with several warehouses and offices. • There is a Glencore Smelter within the study area. • There is a man-made canal that runs through, one of the project sites and crosses the road, running into a wetland area. • Other infrastructure includes electrical powerlines on site. The proposed expansion of the mining right area, with the mining of UG2 Blocks A and B, will be to increase the production and life of mine for the Kwezi Shaft. The Kwezi shaft is currently considered to be on their production decline phase with the expected life of mine to be until 2029 The Unit: IEM is satisfied with the application, and wishes to submit the following recommendations: • All mitigation measurements and the recommendations contained in the Basic Assessment Report for the proposed activities must be implemented. • The contents of the EMP must be available to all known personnel, contractors and subcontractors associated with the project. • Underground mining causes huge amounts of waste earth and rock to be brought up to the surface waste that often becomes toxic when it meets the air and water. • Underground mining might cause land subsidence as mines collapse and the land above it starts to sink, and this might cause serious damage to buildings. • The water table might be low, which will lead to water resource destruction and the contamination of drinking water. • The groundwater monitoring and management plan must be put in place by SRPM. The applicant must be responsible for compliance with the provision for duty of care and remediation of environmental damage by Section 28 of the National Environmental Management Act, 1998 (Act No. I07 of 1998), as amended. This principle requires that the responsibility for cleaning up pollution lies with the polluter. The polluter is responsible for remedying or rehabilitating the resulting damage and bears the financial implications thereof. The responsibility of the polluter will not only be limited to the environment but may also include socio-cultural resources and harm to human health and well-being, Rustenburg Local Municipality Integrated Environmental Management Policy (RLM Policy 2023). In light of the above and the information submitted, please note that the Unit: Integrated Environmental Management support the proposed expansion of the existing underground mining area at the Kwezi shaft.			A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor SCF for each induvial pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of sinkholes, mining has been conducted up to the 40.0 m zone to the East of the existing Kwezi Shaft and no history of subsidence or sink holes were reported and recorded to date. Sinkholes are specific to the dolomitic rock formation which is not present in the Rustenburg area The nature of the geology in the area does not warrant sinkholes. <u>Groundwater Impact Assessment: Potential Impact on the Water Table</u> A Geohydrological Impact assessment was commissioned as part of the Basic Assessment Process. The geohydrological assessment included a numerical groundwater model, which indicated a drawdown cone developing over the proposed mining area. The modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there were no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface. ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in boreholes will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. Sibanye Stillwater has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. <u>Groundwater Impact Assessment: Water Quality</u> According to the Groundwater Impact Assessment, it is very unlikely that any of the boreholes water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast, as indicated on the map below (blue arrows). In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area.



In the event of excessive pumping from the boreholes in the industrial area, this flow pattern can be altered. When the mine is re-watered, water from the mine can be pulled towards the abstraction boreholes. The geochemistry study (refer to Section 5.3 of the report) that was done also indicated that the mine water, when the mine has been re-watered, poses no risk. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards.

The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2

Nr.	Organisation/Commentator	Comment	Date	Source	Response

Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

With reference to the table, the modelling results are as follows:

- The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity.
- The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids.
- Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system.
- Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water.

Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity.

<u>Establishment of an Environmental Monitoring Committee</u>

It is the intention of Sibanye Stillwater to establish an Environmental Monitoring Committee between Sibanye Stillwater and Interested and Affected Parties. The committee inclusive of Sibanye Stillwater monitors the environmental impact of the operations and reports on the performance of the sites management to the Interested and Affected Parties. The establishment of the Environmental Monitoring Committee has been included as part of the Environmental Management Programme.

<u>Groundwater Monitoring and management Plan</u>
A groundwater monitoring and management plan has been compiled and included as part of the EMPr. The monitoring and management plan includes the following:
Mitigation measures

- Seal and grout the mine and ensure water does not flow into mine workings
- Leave pillars around the boreholes to protect the boreholes
- Replace affected boreholes
- Investigate water supply alternatives

Monitoring
- Sibanye-Stillwater to monitor water levels to ensure management actions should levels drop
- Water levels to be monitored
- Water quality to be monitored in all the identified boreholes

<u>Section 28 of the National Environmental Management Act, 1998 (Act No. I07 of 1998)</u>

The EMPr describes the measures that need to be taken by the applicant to ensure that Duty of Care is bestowed by the applicant. The EMPr thus supports this on-going proactive mitigation and the duty of care to the environment.

3	Eskom	This application indirectly affects our Eskom North West Operating Unit, The Eskom affected infrastructures on surface:	**13 November 2024**	Email	The comments and conditions as provided by Eskom has been acknowledged by AvDE and Sibanye Rustenburg Platinum Mines. <u>Location of the proposed activities</u>

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		RUSTENBURG SMELTERS 88/33kV Substation; RUSTENBURG SHAFT / RUSTENBURG INCLINE 88kV Feeder; RUSTENBURG INCLINE / RUSTENBURG PLATS 88kV Feeder; RUSTENBURG COMPRESSOR / RUSTENBURG INCLINE 88kV Feeder; TRIDENT / PAARDEKRAAL 88kV Feeder Eskom Distribution will raise no objection to the proposed application, provided Eskom's rights and services are acknowledged and always respected. The response is for the Environmental Impact Assessment process: • There is 15,5 metres building and tree restriction on either side of the centre line of the 88kV kV power lines, which must be adhered to in all future developments. No construction work may be executed closer than 15,5 meters from any of Eskom's structures and or supporting mechanisms. The separation distance between parallel lines is 21m. • All work within Eskom Distribution reserve area and servitudes must be done in accordance with the requirements of the Occupational Health and Safety Act No.85 of 1993 as amended. Special attention must be given to the clearances between Eskom's conductors, structures, cables and electrical apparatus and the proposed work as stipulated by Regulation R15 of the Electrical Installations Regulations of the Act or any other legal requirements. The requirements of the OHS Act must be adhered to in conditions where they are existing. • Eskom Distribution's services and equipment must be always acknowledged and may not be tampered with or interfered with. • All work within the Eskom Distribution reserve area and servitudes must be done in accordance with the requirements of the Occupational Health and Safety Act No.85 of 1993 as amended. Special attention must be given to the clearances between Eskom's conductors, structures, cables and electrical apparatus and the proposed work as stipulated by Regulation R15 of the Electrical Installations Regulations of the Act or any other legal requirement • The Applicants and Eskom's cables must be placed in sleeves encased in concrete across the width of the servitude, at the applicant's expense where frequent excavations occur in the cable area. • Eskom Distribution shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether because of the encroachment or of the use of the area where Eskom Distribution has its services, by the applicant, his/her agent, contractors, Employees, successors in title and assigns. • The applicant indemnifies Eskom against loss, claims or damages including claims about interference with Eskom Distribution services or apparatus or otherwise. The applicant's attention is drawn to section 27(3) of the Electricity Act 1987, as amended in 1994, which stipulates that the applicant can be fined and/or imprisoned because of damage to Eskom's apparatus. • No mechanical equipment, including mechanical excavators, high lifting machinery and drilling equipment may be used within Eskom's reserve area, or within close proximity of Eskom's services and equipment, without prior permission in writing and supervision of Eskom's authorised area manager for the NWOU Technical Service Centre Area; Teboho Sewisa e-mail: SewisaTM@eskom.co.za (Tel.: + 27 18 464 6724) Customer Network Services Supervisor: Bheki Nxele e-mail: NxeleB@eskom.co.za (Tel.: +27 14 565 1214) • Permission must be obtained at least 10 (10) working days before the commencement of any work within the reserve area. • Eskom Distribution shall always have unobstructed access to and egress from its services. • It will be required of the applicant to familiarise him/herself with all safety hazards related to the electrical plant. • Eskom's consent will not relieve the applicant from obtaining the necessary statutory, landowner or municipal approvals. (Eskom is not the landowner). • Any third-party servitudes encroaching on Eskom servitudes shall have to be registered against the property at the applicant's own cost. • The ineffective management and handling of waste is of crucial importance. No dumping shall be allowed within Eskom Distribution Servitudes. All unwanted waste (gaseous, liquid or solids) should be disposed of at a registered waste disposal site as stipulated under Section 20 of the Environmental Conservation Act (Act 73 of 1989).			The proposed application is for the expansion of an underground mine and no surface infrastructure has been included as part of the application. Mining activities will be undertaken approximately 40 m below surface. According to information provided by Eskom, an Eskom powerline is situated within the proposed Block A mining Block, the proposed project will have an indirect impact on the proposed infrastructure. It is acknowledged that the comments/conditions as provided by Eskom is related to surface infrastructure and Servitudes. Where applicable these conditions has been included in the EMPr. In addition, the project description/mine plan does not warrant: • relocation of services will be required in support of the mining activities. • construction within the 15.5 m buffer • work to be undertaken within the reserve area. <u>Blasting</u> Blasting will be undertaken as part of the mining activities. A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable PPV's refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. Should a positive decision be issued by the DMPR, Sibanye Stillwater will engage with Eskom on the required application pertaining to blasting.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		• No blasting is permitted. If blasting is needed, an additional application is to be lodged with Eskom Distribution. • Any development, which necessitates the relocation of our services, will be to the account of the developer. For the relocation of any services, please contact Eskom Customer Services at Eskom Contact Centre: 086 00 37566. • Eskom will recover costs from the applicant where any damages of Eskom assets and or any penalties suffered by Eskom occur.			
4	Department of Public Works	**1. EXISTING AND FUTURE/ PLANNED PROVINCIAL ROADS** • The existing and future/ planned provincial road(s) should be excluded from the proposed development(s). For more information see the attached Locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM. **2. ACCESS TO THE PROPOSED DEVELOPMENT** • The existing access(es) to the affected land i.e. **locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM** will be utilised/used for the above-mentioned development(s). • No additional access (es) will be allowed to Provincial Road(s) 0108**_010 at** all, without the written approval of the Controlling Authority (Department of Public Works and Roads). **3. NOTIFICATION TO THE DEPARTMENT** The ***Department of Public Works and Roads*** **(dpwr)** should be notified (with appropriate detailed plans) about any of the intentions or planning before the commencement thereof of the following: a. Construction of Permanent or Temporary Access(es) from any of the Provincial roads. b. Construction of any structures e.g. Buildings along any of the Provincial roads. c. Closing and or Deviation of section(s) of the Provincial roads. d. Erection of Advertisements along the Provincial roads. e. Working inside the Road Reserves of any of the Provincial roads. f. Temporary or Permanent Closure of Traffic on either of the affected roads. Erection and or Construction of Overhead and or Underground Services e.g. Water & Sewerage pipelines, Electrical and Telephone Cable Lines across or parallel to the provincial roads. Trees, Shrubs, Cultivated Grass, Gates or Road Fencing, and or any Road Signage and Furniture to be removed or damaged within the Provincial Road Reserve. If such assets are removed or damaged, you will have to replace them to the entire satisfaction of the **Department of Public Works and Roads.** **4. BUILDING LINE** • Except where the approval has been granted for services crossing and or development along the provincial road (s), it may be in terms of Section 9 of the Advertising on Roads and Ribbon Development Act (Act 21 of 1940, as amended) not to be laid nearer than 95m from the centre line of the Road Reserve or within a SOOm radius measured from the centre line of the junction of a building restriction Road Reserve (except a National/ Municipal and or Private road), without the specific permission of the Department of Public Works and Roads. **5. SPECIAL/ SPECIFIC CONDITIONS FOR THE PROPOSED DEVELOPMENT** Your proposed development is hereby granted subject to the strict adherence of the conditions/requirements listed below and all Safety Measures by the applicant/ and or his contractors/ suppliers:	**14 October 2024**	Email	The North West Department of Public Works was identified as an Interested and Affected Party and notified of the proposed project. The department provided comments in terms of way leave. The wayleave provided by the Northwest Department of Public Works has been acknowledged by AvDE and Sibanye Rustenburg Platinum Mines. <u>Location of the Proposed Project</u> The proposed application is for the expansion of an underground mine and no surface infrastructure has been included as part of the application. Mining activities will be undertaken approximately 40m below surface. Road D108_010 is noted, however the road falls out of the mining blocks (Blocks A and B). In future, should mining be planned for the greater mining area adjacent to any provincial road, SRPM will undertake the required approval process with the Northwest Department of Public Works. The proposed project is an expansion of the existing underground mine area. No additional abnormal trucks or equipment will be transported.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		a. ABNORMAL TRUCKS/ EQUIPMENTS Department of Public Works and Roads should also be notified with any of intention of transporting abnormal trucks/equipment on any of the above-stated provincial road(s). b. BLASTING/ EXPLOSIVE OF ROCKS Any unstable conditions encountered or any rock requiring blasting is to be reported directly and immediately to the *Departmental Roads Engineer/ Manager.* Blasting is to be done by the current applicable Explosives Regulations (e.g. Act No 26 of 1956) and possible damage to the road must be excluded as far as possible. Any damage to the road caused by unstable soil conditions (subsidence, etc.) or blasting must be repaired to the satisfaction of the: Departmental Roads Engineer/Manager. c. INDEMNITY OF THE PREMIER AGAINST CLAIMS • You indemnify the PREMIER OF NORTH WEST and exempt him from any claim or damage which may be instituted or suffered by any person, including legal costs, as a result of the laying or erection of any service or any other works caused or erected by you, or as a result of negligence on your part to protect or maintain the service or other works caused by any other person unless you can prove negligence on the part of Department of Public Works, Roads and Transport or its officials. • The Department of Public Works and Roads will not be liable for any damage suffered by the applicant because of the development, operations carried out on road construction or road maintenance or any other operations whatsoever, unless negligence on the part of the Department of Public Works, Roads and Transport or its officials can be proved. • The applicant shall indemnify the Department of Public Works and Roads or its officials and workers against any claims arising out of any death of or injuries to any person or damage to any property whatsoever (including services such as water pipes, telephone and or electric cables, etc.,) caused by or resulting from the activities of the applicant in the road reserve. d. ROAD RESERVE WIDTHS OF THE AFFECTED PROVINCIAL ROADS • Provision must be made for the following road reserves/ streets and must be excluded from the proposed development: i) Road 0108010 with a road reserve width of about 62m e. BUILDING LINE RELAXATION • The *Department of Public Works and Roads (DPWR)* is hereby granted the minimum relaxation of the building line from the Standard 95m as stated by Clause 4: Standard Building Line above as follows. • Road Reserve Width of 62m The Building Line Relaxation is 45m from the centre of the Road Reserve; *(i.e. 15 from the road reserve boundary).* f. LAND USE ALONG THE ROAD(S) • No structure (Poles, Struts, Stays, Manholes, etc.) will be erected and or allowed inside any of the provincial road reserve(s), without the approval from this Department indicating the correct location/ position of the proposed development. • Land use of even buildings on the lines of no access shall be in accordance with the requirements of Executive Committee Resolution 1112 of 26 June 1978. • The applicant shall not erect/build either permanent or temporary structures, or any informal structures along the above-mentioned provincial roads inside the road reserve until he has obtained written approval from the Deputy Director General: Department of Public Works and Roads (Dpwr) to do so. **7 ACCEPTANCE AND DISPOSAL OF STORMWATER**			

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		7.1 In terms of Section 84 of the Road Ordinance, 1957, the applicant shall arrange the drainage of the proposed development(s) in such a way that it fits in with the drainage of the affected provincial Road (s), considering the capacity of the system. 7.2 The applicant/ local authority or whoever is responsible for the drainage of the proposed development(s) shall receive and dispose of all the storm water running from the road or being diverted from the affected road(s). 7.3 The state or the Provincial Administration will not be responsible for any damage caused by arising from such storm water. 7.4 Where, in the opinion of the Deputy Director General: Department of Public Works and Roads, the system for the above-mentioned road(s) is too small to cope with any increased volume of the storm as a result of the establishment or proposed development(s), the applicant/ local authority {whoever responsible for the drainage) shall be responsible for the cost of installing a larger drainage system for the affected provincial Road(s). 7.5 The applicant/ local authority or whoever responsible for the drainage of the proposed development(s) shall be built/ construct the drainage scheme at its own cost simultaneously with the construction of the access (es). **8. PARKING** No parking shall be allowed in the road reserve of the provincial road **0108_010.** **9. PROPERTY RIGHTS/ SUCCESSOR-IN-TITLE** The **conditions of this wayleave are applicable to you** as well as **your successor-in-title** *(where applicable).* If property rights of your service be transferred to any other person or institution, it **will be your responsibility to bring the contents of this wayleave to the attention of your successor-in-title** as the conditions of this wayleave together with your property rights will be transferred to your successor-in-title and will *still* be applicable. **10. THE RIGHT TO WITHDRAW THIS PERMISSION** The Northwest Provincial **Department of Public Works and Roads** reserve the right to withdraw this permission immediately and to remove/ demolish the proposed development if any of the preceding conditions are not complied with, and it also reserves the right to alter or revoke these conditions at any time. **11. VALIDITY PERIOD** The work must be done within twelve months from the date of this Approval Letter. If for any reason at all, the work is delayed for a longer period, extension of time must be requested in writing or a new application will have to be submitted.			
Registered Interested and Affected Parties					
1	Wouter van der Westhuizen	Thank you for confirming our registration as an affected party. Your reply on the 10th of October 2024 below has reference. We would like to register the fact that our property has a 55m deep borehole, drilled in 2022 at an extremely prohibitive cost. The reason for the borehole is because of the Rustenburg Local Municipality's inability to deliver water to any of the businesses in the mentioned Extension 9 area. We have just been notified that some of the businesses in our adjacent area have been visited by your staff to assess their boreholes. We have not had any such visits. If this needs to be registered as part of being an affected party, then please consider it registered under our name with immediate effect. Our property hosts 12 tenants in the building, of which one is a bulk butchery. This tenant must, according to health and safety laws, flush all equipment and floors daily for hygienic purposes. Other tenants make use of water to evaluate water pumps for the mines and require bulk water daily. Should your proposed 40m deep excavations and planned bulk usage of the water reserves in our area affect our borehole, we will be forced to take immediate action should our borehole water be affected in any way – in quality and or quantity. The water	**24 October 2024**	Email	<u>Acknowledgment</u> The objection has been acknowledged by Alta van Dyk Environmental and Sibanye Rustenburg Platinum Mines. The objection and comments received will be documented in the Comments and Response Report and submitted as part of the Final Basic Assessment Report to the DMPR in their decision-making process. <u>Pump tests</u> A geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The borehole on the premises has been noted at BH25 of the hydrocensus. The site was first visited on the 3rd of October 2024. The specialist team were informed that there is a borehole on site, but nobody was able to show the location borehole. The specialist team returned on the 10th of December 2024. The borehole was located and will be added to the census. Arrangements were made with the owner to pump test this borehole on the 8th and 10th of January 2025. On both occasions the test was cancelled by the owner. Since then, the Specialist teams calls have gone unanswered, and they were unable to gain entry to the site to test the borehole. It is critical that the I&AP makes contact with the specialist team to arrange access to the property.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		is of critical importance to our tenants, their staff, business activities and general daily hygiene.			<u>Geohydrological Assessment: Water Quantity</u> The borehole is situated 560m from the closest proposed mining block.
		We hereby notify you of our official opposition to your proposed shallow mining application. This written notification is done in accordance with the 13 December 2024 deadline for objections. **Without limiting our case / future claims, we hereby put forward our current objections:** 1. We have been to all the meetings held to date in this regard. 2. We are registered as an affected party – see the email history as a reference. 3. All your experts have given estimates of the expected damage to our buildings caused by the 40m deep blasting. A 40m depth will leave our properties and buildings highly vulnerable to blasting damage. You are aware of this. 4. Your experts have given estimates of mining activities in other areas. Any seismic and water considerations must be done in the area you are planning to mine. These tests must be done in our area before you can apply for mining rights here. No tests done in other areas can be used to make estimates of possible damage to our properties and water resources here. 5. Sinkholes cannot be ruled out – this a fact. 6. Our property comprises multiple units rented out to tenants: a. We have a deep borehole in place for the last several years, servicing our tenants and our fire hydrant system. The Municipal water supply is highly unreliable. This being the reason for our use of a dedicated borehole. b. Some of our tenants do bulk meat production and retail and water is critical to them daily for hygiene purposes. Reference the Health Requirements in the National Meat Retailer's Laws. c. One of your consultants called us on Thursday (5 December 2024 at 11h15) and informed us that your proposed mining activities will cause the total and immediate loss of our critically needed borehole water. d. We would like to inform you that should your proposed mining activities go ahead, and we lose our current borehole water, we will hold you and all your related parties personally liable for the loss of any rental income should our tenants vacate due to a lack of water. e. We also have tenants testing water pumps for the mines. These testing facilities are highly technical and sensitive to seismic irregularities and are also highly dependent on the availability of continuous water supplies to their testing equipment. Your proposed mining activities will put their business at risk and our related rental income. 7. Should we lose tenants due to your highly risky shallow mining activities and loss of water, we will not be able to repay the current bond registered on the property. We will hold you personally liable for the loss of rental income to cover the bond. **8. Property damage deposit required:** a. You informed us as the attendees at your meetings that you intend to mine for a period of 5 (FIVE) years. b. We hereby request that you as the entity applying for the mining rights, submit a cash damage deposit to our attorney's trust account for the current value of our property, all the improvements and a rental book for 5 years guaranteed rental income to secure our property, and rental income should something go wrong due to your highly risky shallow mining activities in our area and underneath us. c. The deposit sum will be calculated and forwarded to you. d. Without such a deposit, we will officially oppose any of your proposed activities until it is fully paid. **Going forward:** • We are in discussions with all the major stakeholders, property and business owners/industries in Etx 9 to object to your proposed mining application. You have made it clear that your activities will be of a short nature, while our properties/water resources are our livelihoods for decades to come. • We have already instructed our attorneys to serve notices in all the necessary offices related to your application, including the Department of Minerals and Energy.	**7 December 2024**	Email	Although the numerical modelling has shown a potential water level drawdown extending to BH25, the modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there were no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface. ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH25 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. Sibanye Stillwater has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. <u>Property Damage Deposit</u> SRPM is not currently considering purchasing any properties in the area of operations but could consider doing so in future. The Vibration and Stability assessment undertaken, took into account all the relevant and prevailing conditions and indicate a negligible risk of any structural damage. SRPM will therefore not be transferring money into an attorney's trust account.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		This official notification is sent without prejudice to any of our rights, nor can it limit any of our future possible claims/objections / further objectives we might wish to add to this official objection.			A closure liability assessment for the Kwezi Mining Right is conducted annually as per the legislative requirement. SRPM submits a Financial Guarantee to the DMPR on an annual basis. <u>Geohydrological Assessment: Water Quality</u> A geohydrological assessment was commissioned as part of the Basic Assessment Process. The geohydrological report formed part of the Basic Assessment Report. According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).  A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceed the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. o The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place. • The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values. • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The expected quality of water that leach through this material is expected to be good quality as explained below. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards. With reference to the table below, the modelling results are as follows: • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids. • Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system. • Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water. Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity. The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

<u>Management and Monitoring Plan</u>

The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision, the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis.

The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives.

The WUL application is a parallel process also been undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance.

<u>Structural and Operational Risks</u>
A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report.

The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment.

In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellites to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment In terms of sinkholes, mining has been conducted up to the 40.0 m zone to the East of the existing Kwezi Shaft and no history of subsidence or sink holes were reported and recorded to date. Sinkholes are specific to the dolomitic rock formation which is not present in the Rustenburg area The nature of the geology in the area does not warrant sinkholes. <u>Guarantee</u> SRPM is investigating options to address the matter and they we will reach out as soon as we have information. <u>Livelihood</u> SRPM recognizes its responsibility to mitigate any negative impact on water users and properties within its scope of influence. It has established strategies for monitoring, management and ensuring the availability of alternative water resources where necessary. However, it is important to acknowledge that the performance and success of any business are influenced by a range of external factors beyond SRPM's direct responsibility or involvement. Particularly when these factors interact cumulatively, they must be carefully considered in the broader context of the I&APs company's operations
		All our previous email correspondence and phone calls have reference. The deadline for objections by landowners, according to your documentation, is the 13th of December 2024. We have replied to your emails and sent our official objection to your shallow mining application / use of water. See email below dated 9 December 2024. We reserve the right to further expand and escalate our objections as a combined landowner's forum at any later stage. We do not wish to engage in any teams meetings with yourselves on the 12th of December 2024, where all the other landowners are not present / legally represented. No party should be singled out when matters such as these are discussed. We do not have the privilege of a panel of engineers, etc. to answer and evaluate your claims / statistical information. You must deal with the Rustenburg Ext 9 area land owner forum. We hereby request that you postpone your activities to early next year when all the relevant owners / representatives are available to engage you in a combined meeting. We also made it clear when your representative Cathy called us that all meetings must be done with our legal representatives present so that a proper legal trail can be observed for future use. No discussions will be held in telephonic, or teams zoom meetings. Please respect our legal rights and answer the email we sent containing our objection. See below dated 9 December 2024. Our unwillingness to partake, as a single landowner and not as the entire affected parties group, in a meeting set up by you, cannot and will not in any way prejudice any of our rights and our official objection to your application.	**10 December 2024**	Email	The response below was provided as part of an email and formal response to the Interested and Affected party. Thank you for the feedback. Please confirm if there is a link between Maita Wzitoma and Jacques (email: wouterw@mweb.co.za Cell 0827286332). AvDE received the attached email from Jacques confirming attendance as well as a follow up telephonic call, hence the feedback session was set up accordingly. However as per the email correspondence below, the feedback session planned for the 12 December 2024 @ 13:00 will be postponed. The project team has noted the comments and concerns raised, and the team is working towards addressing them. Sibanye Stillwater are in the process of finalising a Monitoring and Management plan and a Focus Group Meeting will be set up for January 2025 to provide feedback. In addition to the response above, it is important to note that the project team will be responding to each I&AP rather than a Focus Group Meeting. Sibanye Stillwater is committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because as a company they want to remain true to their values. There will an environmental monitoring committee established involving I&APS and SRPM representatives as part of the monitoring and management process as defined in the Environmental Monitoring and Management plan.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		Please postpone these meetings until early 2025 to allow all the affected parties to engage you. It is untoward to book meetings when many affected partis are not able to attend or be represented.			
2	Le Roux Eckaard	**1. Concerns Regarding our client's borehole** Our client's factory relies solely on a single borehole as its water source, which is critical for ongoing operations. The proposed mining activities at this depth may: • disrupt the aquifer supplying the borehole; and/or • cause structural damage to the borehole and its equipment, compromising its functionality. Without this water supply, our client's operations will be severely affected, potentially leading to significant financial losses. The municipal water supply is unreliable and almost non-existent. Our client has a municipal water connection, but there is never any water. As a result, there are 25 boreholes in this industrial area. The municipal water pipes are old clay pipes that constantly break. Our client does not have any access to water except through their borehole. We request detailed information about any hydrogeological assessments you have conducted and the measures you plan to implement to protect groundwater and boreholes (there are 25) in the vicinity of your proposed operations. **2. Concerns About Structural Integrity** The factory infrastructure is at risk of damage from: • subsidence due to underground mining; and/or • vibrations or other ground movement associated with mining activities. We request a copy of any geotechnical studies that assess the potential impacts of your operations on neighbouring structures, including mitigation plans. **3. Impact on Insurance Coverage** Our client's current insurance policy excludes damages arising from earthquake arising from mining activities, leaving them financially exposed. Our client has been approached with a request to permit a property evaluation and a housing crack survey on their property as part of the proposed underground mining expansion plan. We believe this request is primarily intended to protect the mine from potential future compensation claims, particularly in disputes over the extent of damage caused or, in cases of total loss, the market value of the property. This strongly shows that the mine anticipates the likelihood of its operations, if extended, resulting in property damage or loss. Should our client's insurance coverage be adversely affected in any way, our client insists on equivalent replacement coverage, to be provided as an unconditional guarantee from your client, covering the full replacement value. We therefore request confirmation that the mine will indemnify our client for any damages to the borehole, factory, or associated infrastructure caused by your mining activities. **4. Compliance with Environmental and Water Laws** Please provide documentation demonstrating compliance with the following: • Environmental Authorization: Has the Environmental Impact Assessment (EIA) for your mining operations addressed the risks to our client's property and borehole? • Water Use License (WUL): Does your WUL account for potential impacts on aquifers and nearby boreholes? **5. Request for Mitigation and Compensation Plans** To address these concerns, we request that you: • Conduct a detailed hydrogeological assessment of the borehole and aquifer to determine the potential impacts of your proposed operations. • Commit to providing an alternative water supply, such as drilling a new borehole or connecting our client's factory to municipal water, should their current borehole be compromised. • Develop and implement measures to prevent subsidence and structural damage to our client's factory. • Enter into an agreement to compensate for any damages or operational disruptions caused by your mining activities. • Establish a joint monitoring program to track groundwater levels and structural impacts throughout your operations.	**26 November 2024**	Email	**<u>Concerns Regarding our client's borehole</u>** A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Geohydrological Assessment was made available as part of the Basic Assessment Report. Euro Sales was informed of the availability of the report on the 13 November 2024. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources (from a short- and long-term perspective). The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The in-depth questions that have been made specifically around BH1 have been addressed as part of this submission and included below. **Geohydrological Assessment** • ***Groundwater Level and Recovery*** The Euro Sales borehole is referred to as BH1 in the geohydrological report. The borehole is situated 920m from the closest proposed mining block. Although the numerical modelling has shown a potential water level drawdown extending to BH1, the modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there was no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface). ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over-conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH1 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		6. Legal and Regulatory Obligations Our client reserves all rights to: • Lodge objections during the public consultation process under the Mineral and Petroleum Resources Development Act (MPRDA) and National Environmental Management Act (NEMA). • Notify the Department of Water and Sanitation (DWS) and Department of Mineral Resources and Energy (DMRE) of any risks arising from your operations. • Pursue legal remedies, including an interdict to halt your operations, should imminently harm to their property or operations become clear. **7. Request for Response** We kindly request your response to this letter (and the questions and concerns raised here) within 10 business days, addressing the concerns raised and providing the requested information. Your cooperation in resolving these issues proactively will be greatly appreciated. Our client is committed to collaborating constructively with your company to ensure that their operations and property are safeguarded. However, they cannot accept undue risks to their water supply, infrastructure, or business continuity. We urge you to engage in good-faith discussions to address these issues comprehensively.			The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Euro Sales monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Rustenburg Platinum Mines (SRPM). Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. **Service Delivery** SRPM is unable to comment on service delivery issues with the RLM. Comments on service delivery must be directed to the relevant authority. **<u>Concerns about Structural Integrity</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The report was made available as part of the Basic Assessment Report which was made available to Euro Sales on 13 November 2024. The mine employs the bord and pillar mining operation method. Pillars are the solid blocks of ground that are not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75%, leaving 25% intact to limit surface subsidence. From a pillar perspective, numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction Ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellites to gather the data. The site will also implement a monitoring and management programme, which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) that are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. The empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec, which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. **<u>Impact on Insurance Cover</u>** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **<u>Compliance with Environmental and Water Laws</u>** **National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)**

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					The legislated obligation in terms of the proposed project is acknowledged. The Basic Assessment Process has been undertaken in terms of the NEMA EIA Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Euro Sales borehole was included as part of the Hydrocensus and the geohydrological assessment. The potential impacts as assessed by the independent specialist has been included in the Basic Assessment report. **National Water Act (Act 36 of 1998)** A Water Use License Application (WUL) is underway with the Department of Water and Sanitation. The Euro Sales borehole was included as part of the Hydrocensus and the geohydrological assessment. The potential impacts as assessed by the independent specialist will be included as part of the WUL submission. The WUL when issued by the Department of Water and Sanitation comes with its own conditions that needs to be adhered to by the applicant. This includes monitoring frequencies, parameters, and auditing requirements. **<u>Request for Mitigation and Compensation Plans</u>** • A detailed geohydrological assessment has been undertaken as part of the Basic Assessment Process. A copy of the report was made available to Euro Sales on 13 November 2024. • SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. • An Environmental Management and Monitoring Plan has been compiled by SRPM. The plan details blast and vibration monitoring to be undertaken. **The Environmental Management and Monitoring Plan has been attached to this submission.** • Sibanye Stillwater commits to compliance with the management and monitoring plan as well as the establishment of the environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. **<u>Legal and Regulatory Obligations</u>** Alta van Dyk Environmental Consultants has been appointed by Sibanye Stillwater as an independent Environmental Assessment Practitioner to undertake the required environmental approval process. The public Participation has been undertaken in line with Regulation 41 of the Environmental Impact Assessment Regulations 2014 (as amended). The objective of the public participation process is to involve the public in the DMPR's decision making process to improve the quality of decisions. The NEMA EIA PP process therefore allows for public comment and participation through the Focus Group Meetings and the availability of the Draft Basic Assessment Report. Both the DMPR and the DWS will be informed of the comments and concerns raised through this Environmental and Water Use Authorisation Process. The comments received are captured in the Comments and Response Report and submitted with the Final Basic Assessment Report to the DMPR for decision making. **<u>Request for Response</u>** A meeting was set up by SRPM and AvDE with Le Roux Eckaard Attorneys and Euro Sales for the 4 December 2024.
		1. How Sibanye-Stillwater has determined the possible impact on Euro Sales' borehole (BH1) as negligible, as Euro Sales is located within the 1km radius identified as the potentially impacted zone by the Geohydrological Impact Assessment (page 50). 2. The Geohydrological Report determined the water level will drop by ~ 9 m below the depth of BH1 and may remain dry post-closure of the Kwezi Operation (reference made to pages 52-54, and Table 7.1. 3. Pg 36 "This elevation of approximately 1 097 mamsl will to some degree control the level to which the mine water level will recover. In the Kwezi extension area, the dewatering cone that could develop may not fully recover if this decant occurs. In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure" The lawyer was not comfortable with this statement and the impact of decant. 4. How the mitigation and rehabilitation measures will protect BH1 against this scenario-Sibanye-Stillwater will advise. 5. The potential deterioration of the water quality as a result of the proposed mining operations, as many of the ES tenants are reliant on potable water from BH1 (reference made to page 57).	**4 December 2024**	Teams Meeting	A response to the comments received during the meeting is provided below: <u>Geohydrological Impact Assessment</u> • ***Groundwater Level and Recovery*** The Euro Sales borehole is referred to as BH1 in the geohydrological report. The borehole is situated 920m from the closest proposed mining block. Although the numerical modelling has shown a potential water level drawdown extending to BH1, the modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there were no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area.

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					In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface. ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH1 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Euro Sales monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. • ***Water Quality*** According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					 Borehole BH5 is 794m from the proposed mining. The chemical analysis of BH5 showed poorer quality than the other boreholes that were also sampled. The water has high salt content as indicated by the elevated concentrations of EC, TDS, sulphate and magnesium.BH5 is located up-gradient from the mine and mining infrastructure. Groundwater flow is therefore from BH5 towards the mine. Since contaminant migration is dependent on the groundwater flow direction, any contamination that may be present in the mine water will flow northeast and away from BH5. The mine or mining infrastructure cannot impact on this borehole and the poorer quality is most likely from another source. This is supported by the fact that the boreholes closer to the mining operations do not show similar or poorer water quality results. It should be remembered that this borehole is within an industrial area and that there are numerous other contamination sources, unrelated to mining are currently presents and is impacting on the borehole. A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceeds the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. ○ The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place. • The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values. • The model results for the underground mine voids indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The expected quality of water that leach through this material is expected to be good quality as explained below. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards. With reference to the table below, the modelling results are as follows: • The model results for the underground mine voids indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The model sulphate concentration is below regulatory guideline values, i.e. SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids. • Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system. • Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water. Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity. The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

- ***Potential for Mine Water Decant***

When all mining ceases and the pumping of water from underground stops, the mining void will fill with water. Eventually the mine will be completely re-watered, and the water level will stabilise at an elevation similar to the pre-mining groundwater level. Since there is no dewatering currently taking place, the current groundwater level will also be the final groundwater level. In a situation where the water in the mine void rises above the collar elevation of a particular shaft, decant will occur at that point. Thembelani 2 shaft is potentially such a point. None of the other shafts are below the estimated final groundwater level. The Thembelani 2 Shaft is only 0.6m below the groundwater level and a low decant volume (if any) is expected. It is also common practise for the mines to backfill and plug the shafts when rehabilitating. A Section 21 g in terms of the National Water Act has been included as part of the WUL for the backfilling of the mining area. In doing this, the potential for decant is negated. The geohydrologist therefore does not see this as a potential risk, although it was brought to Sibanye-Stillwater's attention in the groundwater report. As part of this application, SRPM is applying for a Section 21 g water use in terms of the NWA for the backfilling of the underground workings.

		1. Reiteration of Our Client's Concerns Our client stays deeply concerned about the potential impacts of the proposed mining activities, as found by your experts, including: • Groundwater Depletion: The risk of significant drawdown in groundwater levels, making borehole BH1 unusable during operations. • Water Quality Degradation: Potential contamination of groundwater due to mining activities (such as backfilling etc.), detrimentally affecting a water resource. • Groundwater Recovery Post-Mining: Underground mining activities will take place within 100m from a watercourse and within 500m of a delineated wetland and could • impede or divert the flow of water in a watercourse. • Structural and Equipment Damage: Risks to infrastructure from subsidence or ground vibrations caused by blasting operations. **2. Request for Confirmation of Mitigation Measures** We request that SRPM provide a written undertaking detailing: • Which of the recommended mitigation measures (as identified by your environmental experts) will be implemented in the future.	**5 December 2024**	Email	**<u>Reiteration of Our Client's Concerns</u>** • A response on the groundwater depletion, recovery and water quality has been included on the response above. • A response on Subsidence and Blasting has been included above. • In terms of activities undertaken within the regulated area, A Freshwater Assessment was commissioned as part of the Basic Assessment Process to identify and delineate watercourses with the Study area. The Freshwater assessment forms part of the Basic Assessment Report. The study identified that mining activities will boarder a Channelled Valley Bottom Wetland. Due to the mining activities situated adjacent to the delineated watercourse (within the DWS regulated area), a Water Use License Application for a Section 21 c & i activities in terms of the NWA has been applied for. The study revealed that based on the Present Ecological State and Ecological Importance and Sensitivity of the wetland. Due to the significant invasion of alien vegetation and modification of the hydraulic regimes, the CVB wetlands were assessed to be in a seriously modified (Category E) ecological condition and of low/marginal ecological importance and sensitivity. The proposed mining activities are expected to pose a low risk to the wetland provided that mitigation measures are adhered to. **<u>Request for Confirmation of Mitigation Measures</u>** The Geohydrological Assessment has identified the potential impact on groundwater levels which includes BH1. The mitigation measures as provided in the geohydrological assessment have been included as part of the Basic Assessment Report and Environmental Management Programme. Reference is made to some of these mitigation measures:

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		• Which measures have already been implemented to address the reported risks. • This includes, but is not limited to: o Sealing of water-bearing features using chemical grouts. o The establishment of alternative water supplies or well fields. o Regular monitoring of groundwater levels and quality. o Specific blasting vibration limits and safety protocols. **3. Guarantee for Compensation** If the recommended mitigation measures prove unsuccessful, we request an unconditional guarantee that SRPM will compensate our client for any damage or loss suffered. because of the mining operations. **4. Undertaking Regarding Groundwater Recovery Post-Mining** Once mining operations in Blocks A and B cease, we request an unconditional written undertaking that SRPM will implement the necessary steps recommended by experts to allow the groundwater levels to recover. This includes, amongst others, sealing shafts and other measures to prevent mine water decant and ensure aquifer restoration. **5. Request for Monitoring and Management Plan** We ask that you provide us, within 10 days, with: a copy of the Monitoring and Management Plan referred to by your environmental consultants in their minutes dated 6 November 2024. This plan is critical to ensuring that all risks are proactively managed and mitigated. • a transcription of the meeting that was recorded **6. Insurance Cover:** We explained our client's predicament in our letter of 26 November 2024. We need a proposal from you as to how you envisage dealing with the problem.			• *"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".* o This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project. • *"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".* o SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense. • *"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".* o According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL. • *"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".* o As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B. • *"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".* o *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* o *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* It should be emphasised that these mitigation measures are not only approved by the two Competent Authorities (DMPR & DWS), but the conditions of an authorisation and license also include external and internal audits for adherence to the mitigation measures. Other than the above mentioned, SRPM undertakes water quality monitoring as per the approved WUL for the existing operations. Blast and vibration monitoring is also undertaken. The operations also have a cover drilling procedure in place which covers most aspects of water bearing features A Ring cover drilling is done, and it includes drilling holes into the feature and then pumping special grout for sealing. **<u>Guarantee for Compensation</u>** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **<u>Undertaking Regarding Groundwater Recovery Post-Mining</u>** Refer to the above regarding the findings of the groundwater assessment. Other than the mitigation measures as recommended by the independent specialist. SRPM has compiled an Environmental monitoring and management Plan. The management measures provided in the plan include the following: • Seal and grout the mine and ensure water does not flow into mine workings • Leave pillars around the boreholes to protect the boreholes • Replace affected boreholes • Investigate water supply alternatives The monitoring action plan is as follows:

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					• Sibanye-Stillwater to monitor water levels to ensure management actions, should levels drop • Water quality to be monitored in all the identified boreholes
		1. Noted that SS has not issued written confirmation of what recommended measures will be implemented or a plan, should mitigation measures be inadequate or insufficiently implemented. 2. The insurance provider has indicated that no coverage from loss or damages incurred as a result of mining activity will be provided to the company. What assurance can be provided to Euro Sales to navigate the loss of insurance coverage as a direct result of the proposed mining expansion project. 3. Regarding the matter of insurance that the broker or company that Euro Sales utilizes is subject to change, however, the principal remains the same; due to the mining activity, Euro is unlikely to receive coverage for loss or damages as a result. ER asked that ES receive coverage from SS for the replacement value of any damages incurred to the property as a result of SS's mining activity 4. Requested SS provide assurances to Euro Sales, should Euro Sales suffer from loss or damages as a result of the mining activities. 5. SS should be able to provide assurance readily if the risks to Euro Sales property are as minimal as stated by SS. 6. The main engagement with SS is to gain assurance that the mitigation measures will be applied	**12 December 2025**	Teams Meeting	Following the meeting held on 12 December 2024, a response was provided to Euro Sales and Le Roux Eckaard Attorneys by SRPM on 19 December 2024.
		We act on behalf of Euro Sales Manufacture (Pty) Ltd, the factory's owner for structural steel products, fabrication and light engineering, situated at 7 Chroom Crescent, Industrial Area, Rustenburg (approximately 1 km from the proposed mining expansion area). In terms of the applicable legislation we, on behalf of our client, wish to submit an objection to the formal applications of Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for: • The proposed amendment or variation of mining right NW30/5/1/2/2/80MR, as detailed in the Draft Basic Assessment Report (DBAR) whereby the existing Approved Mining Right Area will be expanded; and • the application for a water use licence in terms of the applicable legislation which application is necessitated by the fact that waste rock will not be brought to the surface and will be packed underground, i.e. backfilling of the proposed UG2 Shallows Mining blocks A and B will take place. Our client acknowledges the public participation process initiated by the environmental assessment, but they have significant concerns regarding the environmental, operational, and legal implications of the proposed (expanded) mining activities. Basis of the Objection 1. National Environmental Management Act (NEMA), 1998 (Act 107 of 1998) • Section 2(4)(a) of NEMA requires that environmental management prioritises sustainable development and ensures that adverse environmental impacts are minimised. • The DBAR fails to adequately address the potential long and short-term environmental impacts on groundwater resources in the area generally and specifically in respect of our client's aforesaid borehole which is currently their only source of water for their manufacturing operations, including drawdown and contamination risks to our client's factory borehole (BH1). • Section 24 of NEMA mandates that all activities affecting the environment must follow an integrated environmental management approach, which appears lacking in the current assessment, particularly with respect to any undertaking by SRPM to implement the mitigation measures for groundwater impacts as recommended by their technical experts. 2. National Water Act (NWA), 1998 (Act 36 of 1998) • Section 27(1)(b) of the NWA requires that the needs of current and future water users be considered in water use license applications (WULA). The proposed expansion fails to adequately ensure that sufficient groundwater resources will remain available for industrial use by our client. • Section 19 imposes a duty on the mine to prevent pollution of water resources, but the mitigation strategies for potential contamination risks remain vague in the DBAR. 3. Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002)	**13 December 2024**	Email	<u>Acknowledgment of the Objection</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)</u> The legislated obligation in terms of the proposed project is acknowledged. The Basic Assessment Process has been undertaken in terms of the NEMA EIA Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Geohydrological Assessment was made available as part of the Basic Assessment Report. Euro Sales was informed of the availability of the report on the 13 November 2024. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources (from a short- and long-term perspective). The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The in-depth questions that have been put forward, specifically around BH1, have been addressed as part of this submission and included below. The Geohydrological Assessment has identified the potential impact on groundwater levels which includes BH1. The mitigation measures as provided in the geohydrological assessment has been included as part of the Basic Assessment Report and Environmental Management Programme. Reference is made to some of these mitigation measures: • *"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".* ○ This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project. • *"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".* ○ SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. . A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense. • *"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".* ○ According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational

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		• Section 2(h) of the MPRDA requires mining operations to promote equitable access to mineral resources while minimising adverse impacts on the environment and communities. The proximity of the proposed mining area to our client's factory places them at an increased risk of environmental and operational harm. 4. Other Legislation • There is also other legislation that applies [see DBAR p34-35]. If any rights are granted, they should be made subject to compliance with such legislation (to be confirmed under oath by the CEO of SRPM) before construction is allowed to commence. Client's General Concerns The application for expansion of the existing mineral rights includes an area (the block southeast of the proposed mining Blocks A and B) where no mining is proposed for the said area. The environmental sensitivity of this area ranges from Very High to High and Medium in respect of themes like Aquatic biodiversity, Archaeological and cultural heritage and Terrestrial biodiversity (Very High); Agriculture and Civil Aviation (High) and Animal species and Palaeontology (Medium) [see Table 7 on p12 of the Draft Basic Assessment Report (DBAR)]. Because of this degree of sensitivity and the fact that no mining is proposed for that area, no expansion to that area should be allowed. In fact, no case has been made out to justify any expansion beyond Blocks A and B.I f the Minister is inclined to grant the expansion of the mineral rights, we suggest that a further desktop study is necessary to assess the impacts and if necessary, also a field assessment. Client's Specific Concerns A number of potential medium to high impacts (relating to the impacts on groundwater, and ground vibration) have been identified that are associated with the operational and closure phases of the expanded mining activities. • Groundwater Impact: ○ The proposed mining operations pose a significant risk of groundwater depletion and contamination, which could directly affect our client's borehole, BH1, a critical water source for their industrial processes. ○ Simulations predict a drop in the water level at BH1 by approximately 19.92 meters due to mining activities. If this happens, BH1 may completely dry up, making it unusable. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes was assessed (Table 7.1 of the Geohydrological Impact Assessment – Appendix C4 to the DBAR). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole are highlighted in red. This assessment shows that over time many of the boreholes may dry up. ○ The Groundwater Level Recovery will take approximately 15 years to fully recover post-closure, assuming no decant. Appendix C to the Geohydrological Impact Assessment shows a simulated Groundwater Level Recovery for BH1 of 51 years. ○ The water table in the area is expected to drop as mining progresses, affecting BH1 and other nearby boreholes. [Table 7.1 p. 52] ○ The test results for Monitoring Borehole BH5 (the closest to BH1) show likely contamination that would exceed the permitted levels in respect of certain elements (which is indicative of impacted water) [Table 31, p 96]. The DBAR also recognises that the "backfilled underground workings will at some point begin to decant because of an increase in recharge. The water may be of poor quality and high in nitrate content and therefore pose a contamination threat to the underlying groundwater." [p. 105] ○ It is further recognised that there is a medium to high risk that post-closure management activities may result in contamination of water within the receiving environment, and subsequent reduction in water quality (increase in salts and specific contaminants of concern and reduced pH) [Table 35, p. 112]. ○ The proposed mining activities at the suggested depth may: • disrupt the aquifer supplying the borehole. It is also to be noted that the expanded underground mining activities will take place within 500m of a Channeled Valley Bottom Wetland (CVBW)and 100m from the closest watercourse. The operation of the underground mining area related to the undermining of the north--eastern CVBW is described as a medium to high potential of creating a cone of depression, which may drain water from the CVB wetland, thus resulting in desiccation of the wetland [p. 107, Table 34]. • cause structural damage to the borehole, compromising its functionality. The operation of the underground mining area related to the undermining of the			monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL. • *"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".* ○ As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B. • *"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".* ○ *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* ○ *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* Emphasis should be made that these mitigation measures are not only approved by the two Competent Authorities (DMPR & DWS), but the conditions of an authorisation and license also includes external and internal audits for adherence to the mitigation measures. <u>National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)</u> SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. BH1 does form part of the existing hydrocensus, and pump testing is currently underway. These are critical aspects in the development of the baseline data which will motivate and support the evaluation of alternative water source requirements in the future. Response with regards to water quality and management thereof has been provided below. A Water Use License Application (WUL) is underway with the Department of Water and Sanitation. The WUL when issued by the Department of Water and Sanitation comes with its own conditions that needs to be adhered to by the applicant. This includes monitoring frequencies, parameters and auditing requirements. There is a multifactorial legislative network which the SRPM will need to be compliant to. Other than the mitigation measures provided in the DBAR and WUL, Sibanye Stillwater commits to compliance with the monitoring and management plan as well as the establishment of the environmental monitoring committee. This information will be made available to the DWS as part of the decision-making process. <u>Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002)</u> The Basic Assessment Process has identified the potential impacts on the receiving environment. Mitigation measures have been assigned to the identified potential impacts which has been included in the Environmental Management Programme for submission to the DMPR for decision making. According to the independent specialist assessments, with the implementation of the correct mitigation measures, the site has possibility of mitigating any potential adverse environmental impact through the implementation of mitigation measures. All potential impacts have a significance score of medium to low. Other than the Environmental Monitoring Committee (yet to be established), Sibanye Stillwater has a grievance procedure in place whereby the I&APs are able to raise concerns and complaints for close out. Section 5A of the MRPDA refers to the requirement of Environmental Authorisation. In addition, a Regulation 17 application in terms of the Mine Health and Safety Act was submitted on 12 September 2024. The application is for the undertaking of mining within the 100m Regulated Area. The application was accompanied by a Risk Assessment. <u>Other Legislation</u> The project has an overall holistic approach in terms of ensuring that the Kwezi shallows project is authorised under all relevant and applicable legislative requirements prior to the commencement of the project. Each applicable legislation governs the required approach to obtain authorisation as well as set forth requirements for compliance auditing and

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		north-eastern CVBW is described as a medium potential of destabilising the surrounding environment through the extraction of ore with a subsequent potential subsidence of the land [p. 107, Table 34]. cause the borehole to dry up. In this regard, the DBAR states on p103 as follows: "The change in groundwater level at the end of an assumed 5-year mining period is shown in Figure 45. The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 60 m. The extent of the impact is within a radius of 1 km from the edge of the mining block. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes was assessed (Table 33). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole are highlighted in red. This assessment shows that over time many of the boreholes may dry up." BH1 is marked red in Table 33 on p 103. The potential lowering of the groundwater level is regarded as the most significant risk associated with the project. It has the potential to impact private groundwater users, who are solely reliant upon groundwater as their only source of water; • the reactive rock may result in the potential formation of acid mine drainage; and possible leachate formation which could impact the water resources. Proper management and treatment of leachate are therefore crucial to prevent environmental pollution. ○ Without this water supply, our client's operations will be severely impacted, potentially leading to significant financial losses. ○ The DBAR does not sufficiently address the feasibility or reliability of alternative water sources. ○ Aquifer Impact: Weathered Aquifer. [p12 of the Geohydrological Impact Assessment]: The finding is that the borehole's reliance on a shallow aquifer makes it susceptible to disruptions caused by mining, including reduced water availability and quality. ○ Potential for Mine Water Decant: In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure. Sealing of the low-lying shafts may be considered as a mitigating measure not only to prevent decant, but also to allow the mine water level to rise and the affected boreholes to recover. ○ Water Quality: Mining activities, particularly waste rock interactions, might degrade water quality, introducing contaminants or altering the hydrochemical balance. [p 34 and p 57] The most significant post-closure risk that may impact the groundwater regime is: • Reduction in the groundwater levels. [Risk Medium -High Table 7.4 on p 58]. The potential lowering of the groundwater level is regarded as the most significant risk associated with this project. It has the potential to impact private groundwater users, who are solely reliant upon groundwater as their only source of water. ○ SRPM concedes that the effects of climate change were not considered. However, it is acknowledged that " this might exacerbate the anticipated reduction in water inputs and the resultant hydrological function of the watercourse beyond the extent of the proposed development." [BBAR - p15]. We submit that this acknowledgement alone necessitates a specialist report to provide more detailed information on the extent of the anticipated reduction in water inputs and any design controls and mitigation measures that can be implemented to manage and/or reduce these impacts. ○ Structural and Operational Risks: The vibrations and subsidence from mining activities could damage our client's factory infrastructure and equipment. No detailed vibration management plan has been provided. ○ Inadequate Mitigation Measures: • The DBAR proposes general design controls and mitigation measures but lacks specific commitments, guarantees, undertakings, indemnities or implementation timelines that SRPM is prepared to give. • Also, our client's current insurance policy excludes damages arising from earthquakes arising from mining activities, leaving them financially exposed in the event of loss/damage being suffered because of the expanded mining activities. No indemnity has been provided/offered to our client (on a replacement value basis) for any loss/damages to the borehole, factory, or associated infrastructure caused by the expanded mining activities of SRPM.			consequences for non-compliance. Sibanye Stillwater will be guided under this various legislation in terms of how responsibilities and commitments are approached. <u>Assessment of the Mining Right Area and the DFFE Screening Tool</u> Section 1.5.3 of the DBAR indicates that a Prospecting Right is currently in place for the area proposed to be included in the SRPM mining right. The inclusion of a greater area other than Blocks A and B was an agreement between the holder of the Prospecting Right and SRPM. The inclusion of the greater area (outside Block A and B) was in fulfilment of a contractual agreement between Onalenna Mining Resources (Pty) Ltd and SRPM. This should be seen as SS securing additional mineral resources for future development in support of its business model. At this stage, there are no plans to mine the area greater than Block A & B. Once feasibility studies are undertaken and should the mine decide on a further expansion of Blocks A & B, an Environmental approval process will be undertaken. The Environmental process will then include a full assessment including ground truthing and the baseline environment being <u>Compliance with Environmental and Water Laws</u> The proposed project triggers a Basic Assessment Process in terms of the National Environmental Management (Act 107 of 1998), Environmental Impact Assessment Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources. The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The Geohydrological study was made available as part of the Draft Basic Assessment report. The Draft Basic Assessment was made available for public and Commentary Authority review from the 14 November until 13 December 2024. A Water Use License application is currently underway (WUL reference: WU 36938). The WUL application takes into consideration the geohydrological assessment and the impacts as identified by the independent specialists. Potential impacts on the aquifer and adjacent boreholes have therefore been included in the impacts assessment and mitigation measures have been assigned. **<u>Groundwater Impacts</u>** This has been addressed in detail above. <u>Climate Change</u> The global continuous emitting of greenhouse gases is likely to increase the mean global surface temperature resulting in heavy precipitation events, sea level rise and unpredictable weather conditions. From a country perspective South Africa is warming at twice the global rate and as such, the frequency, intensity and unpredictability of extreme weather events may increase in the coming years. It should be noted that while the Kwezi Shallows Underground expansion will have a direct and indirect contribution to greenhouse gas emissions, it is not the only contributor in the area. With this being said, Sibanye Stillwater remains a dedicated partner in the transition to a low-carbon future, given that they invest in green metals; these are metals needed for renewable energy (solar and wind), batteries, and hydrogen. This is encapsulated in their strategic differentiator: Unique global portfolio of green metals and energy solutions that reverse climate change. The Group sustainability strategy calls for (i) building a climate change resilient business, and (ii) data-driven and considered decision-making. Sibanye Stillwater supports the global response to climate change in two primary ways: by reducing their own carbon footprint and by delivering those commodities needed to mitigate carbon emissions. Sibanye Stillwater's climate change and energy and decarbonisation position statements are aligned with the International Council on Mining and Metals (ICMM's) climate change commitments, to SDGs 7 and 13, and to the UNFCCC (United Nations Framework Convention on Climate Change) Paris Agreement. Sibanye-Stillwater was one of 28 international mining and metals companies that committed to the new ICMM climate change position, announced ahead of COP26 (November 2021), which includes a commitment to net zero by 2050. In 2023 an A-score for the CDP submission was obtained and for the 2023 CDP water management submission a BBB MSCI ESG rating was obtained. Sibanye Stillwater achieved the benchmark of limiting GHG emissions to the 2023 normalised threshold of 6.8 tCO2e (scope 1 & 2). **<u>Structural and Operational Risks</u>** This aspect has been addressed above **<u>Specific Blast Vibration Limits and Safety Protocols</u>** The mine has set standards for drilling and blasting practices that are employed in the operations.

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		Requests for Clarification and Action **1. Commitment to Mitigation Measures:** Our client requests that SRPM commits in writing to all mitigation measures outlined in the DBAR and provides an Environmental Management Programme (EMPr) spelling out what control and mitigation measures will be put in place together with suitable guarantees and indemnities to our client's satisfaction regarding the issues raised herein, and a detailed timeline for the implementation of suitable control and mitigation measures. **2. Comprehensive Groundwater Management Plan:** Provide a detailed plan outlining how groundwater resources will be monitored and protected throughout the operational and post-mining phases. **3. Guarantees for Compensation:** Our client seeks an unconditional guarantee that any damages or losses resulting from the mining operations, including groundwater depletion or structural damage, will be fully compensated. **4. Unconditional Undertaking for Post-Mining Recovery:** Ensure that after mining ceases in Blocks A and B, all necessary steps will be taken to restore groundwater levels and minimize environmental impacts, as required under NEMA and NWA. **5. Monitoring and Reporting** ○ As a condition to any environmental authorisation granted, it must be stipulated that internal environmental compliance audits on the EMPr must be undertaken annually, and the resultant audit reports must be submitted to the DMPR and to our client. External environmental compliance audits on the EMPr must also be undertaken every two years by an independent EAP and a copy of the external audit report must submitted to the DMPR and our client. ○ Our client's borehole must be monitored by SRPM monthly for damage, water quality and borehole level and the report must be made available to our client. **6. Financial Provision** ○ Sect 24P of the National Environmental Management Act (NEMA), requires the submission of financial provisions for rehabilitation, closure, and post-closure management of environmental impacts for mining activities. SRPM asks for an exemption and provides a motivation (Appendix E). Our client submits that the motivation is inadequate and that a further bank guarantee should be provided for an additional amount to the satisfaction of DMPR for the following reasons: • SRPM's motivation that the expansion will utilise existing infrastructure and thus not significantly increase surface disturbance does not align with the spirit of the law. This law exists to ensure that mining companies adequately cover the costs of rehabilitating the environment after mining operations have ceased, regardless of the perceived insignificance of additional disturbances. • SRPM has not provided current data or assessments to substantiate that the existing financial guarantee of R214,704,579.72 remains adequate against the backdrop of the proposed expansion. Mining economics are volatile, and the costs associated with environmental rehabilitation can escalate due to unforeseen contamination or structural changes necessitated by expanded operations; • There is no indication that the existing financial provision has been updated or increased to reflect current or future potential costs directly related to the areas now proposed for inclusion under the mining right. This is critical as the expansion could uncover new environmental challenges that were not accounted for in the original financial provisioning; • The original financial guarantee was presumably established in 2002. Given the inflationary pressures and changes in environmental rehabilitation technologies and requirements, it is unlikely that a guarantee set nearly two decades ago would suffice for future rehabilitation needs, particularly when the mining area and volume of operation are to be expanded;			Blasting is undertaken as per a blast design. Blasting protocols for the operations are three blasts a day at set specific times. The blast lengths in this project have been reduced to 2.0 m maximum for the specific project and a lower density explosive will also be utilised to reduce the effects of blast vibrations. An 8milli second delay will be deployed to ensure that shot holes are not fired concurrently that could increase the PPV's during blasting. The blast vibration limits that will be deployed in the project area are as per the USBM limits. See Table 5.1 page 21 Kroondal West, Blast and Stability Assessment. <u>Liability in terms of Mining Activities</u> SRPM is investigating options to address the matter and they we will reach out as soon as we have information. <u>Commitment to Mitigation Measures</u> The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision, the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis. The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives. The WUL application is a parallel process also being undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance. <u>Groundwater management plan</u> Other than the mitigation measures as recommended by the independent specialist, SRPM has compiled an Environmental monitoring and management Plan. The management measures as provided in the plan include the following: • Seal and grout the mine and ensure water does not flow into mine workings • Leave pillars around the boreholes to protect the boreholes • Replace affected boreholes • Investigate water supply alternatives The monitoring action plan is as follows: • Sibanye-Stillwater to monitor water levels to ensure management actions should levels drop • Water quality to be monitored in all the identified boreholes <u>Monitoring and reporting</u> The hydrocensus boreholes (as Eurosales) will not be monitored on a monthly basis as these boreholes are noted as an equipped borehole which could result in damages to the infrastructure. For this reason, SRPM has identified five monitoring boreholes that will be used for operational monitoring. These boreholes provide a representation of the sample area. The monitoring results will be presented through the established environmental monitoring committee. The proposed operational monitoring boreholes has also been included in the WUL application to the DWS. The EMPr monitoring is set by the EA to be issued. Monitoring and reporting will be undertaken accordingly, based on the conditions set forth in the EA. The frequency as stated has been recommended in terms of compliance auditing and has subsequently been recommended in the BAR. In terms of the provision of the audit report, such request can be discussed further in the Environmental Monitoring committee. <u>Financial Provision</u> Note of importance: Financial provision is undertaken on an annual basis, all new activities and potential impacts are assessed annually as part of the liability assessment and adjusted accordingly. Specialist studies are conducted where needed to inform decisions made on costs. A pre-application meeting was held with the DMPR on the 21 May 2024. Due to the fact that there is no surface infrastructure as part of this application and a financial guarantee is updated and submitted to the DMPR on an annual basis, the DMPR advised that a motivation stating such must be submitted as part of the application for consideration by the DMPR. The motivation provided was as per the pre-application meeting held with the DMPR on 31 May 2024. The basis of the motivation was that no surface infrastructure forms part of this application and therefore no quantification was required.

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		• Even if the expansion utilises existing infrastructures, such as the Kwezi shaft, the increased extraction of resources is likely to pose additional risks to local ecosystems. This can include increased risk of water pollution, borehole and habitat destruction, and potentially irreversible biodiversity loss. Such impacts necessitate a re-evaluation of the financial provisions to ensure they are commensurate with the potential damage and the costs of mitigating such impacts; • The closure objectives aim to integrate the post-mining landscape with regional land uses and promote biodiversity. Expanding mining operations without adjusting financial guarantees could jeopardize these objectives, especially if financial resources fall short in addressing more extensive rehabilitation needs; • The impact on water quality and catchment yield must be reassessed in light of mining expansion. The current financial provision may not adequately address the potential for increased water use, contamination, and the need for more extensive water purification and management strategies post-closure; • The motivation provided by SRPM for not enhancing the financial guarantee in light of their expansion underplays the potential for increased environmental impact. It does not adequately safeguard against the financial risks of insufficient rehabilitation funding. DMPR must enforce a thorough reassessment of the financial guarantees in place, ensuring they are sufficient to cover the real costs of rehabilitating the mine to a state that supports sustainable post-mining land use and adheres to environmental protection standards. This reassessment should be guided by current environmental evaluation and future risk anticipation rather than historical financial provisions that may no longer be adequate. We urge you and your client to carefully consider these objections and take appropriate actions to mitigate the significant risks posed by the proposed expansion. Should the mitigation measures prove inadequate or fail to address our client's concerns, our client reserves the right to pursue further legal action to protect its interests. We look forward to receiving a written response addressing these concerns within 10 business days.			The existing infrastructure forms part of the existing closure liability assessment, which is updated annually, and the existing Kwezi Closure liability has been deemed relevant and standing. Reference is made to 2002; it is unclear where that date has been sourced from. The amount provided for the entire mining right area was based on the 2023 assessment costs. The guaranteed sum is R214 704 579.72. of the total sum ~ R53.1 million has been allocated to Kwezi. The guarantee was submitted to the DMPR in 2024 and the guarantee date reference is 10 April 2024. The 2024 assessment has been completed and currently subject to an external audit. Once completed the top-up will be determined and adequate provision made as required by legislation. The closure liability assessment for the Kwezi Mining Right is conducted annually as per the legislative requirement. As the expansion is underground, no additional infrastructure is required on surface which means that all existing infrastructure (as per the Kwezi Property inventory) is accounted for. Included in the assessment is to apply a demolition cost for all infrastructure within a mining right, which SRPM is currently doing. SRPM goes the extra mile and even includes infrastructure on the surface right boundary should it fall out of the MR. The potential impact on groundwater is assessed annually and remediation costs (if needed) are adjusted based on the outcome of the assessment and included in the assessment. It is important to note that Rehabilitation costs are allocated for the entire disturbed footprint. New buildings are added annually as part of the assessment (if applicable) and rehabilitation allowances adjusted accordingly. Following the comments on 13 December 2024, a response was provided to Euro Sales and Le Roux Eckaard Attorneys by SRPM on 19 December 2024
		Subject: Response to Assurance Letter Regarding Kwezi Shallow Operations We acknowledge receipt of your letter dated 20 December 2024 regarding the Kwezi Shallows Operations and thank you for your engagement on this matter. However, we note with concern that your response fails to adequately address several critical aspects raised in our objection letter dated 13 December 2024 on behalf of our client, Euro Sales Manufacture (Pty) Ltd. Below, we outline the outstanding issues, deficiencies in your response, and seek further clarification and commitments. **1. Groundwater Impacts and Borehole Mitigation** You have assured that dewatering impacts will be minimized, with alternative water supplies offered subject to scientific investigations. However: • **Lack of Specificity**: No detailed timeline or methodology for these scientific investigations has been provided. • **Proactive Measures**: Your assurance fails to specify measures to prevent aquifer disruption. Our client reiterates the need for a hydrogeological assessment specific to their borehole (BH1). • **Water Supply Guarantees**: A clear and binding commitment to provide alternative water sources, including timelines and specifications, is required. **2. Structural and Operational Integrity** Your response states that subsidence and vibration monitoring will adhere to USBM standards. However: • **Vibration Management Plan**: No comprehensive vibration management plan or structural mitigation measures for our client's factory were provided.	**17 January 2025**	Email	<u>Groundwater Impacts and Borehole mitigation</u> • The findings of the groundwater impact assessment have been included above. • **Lack of Specificity:** A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The investigation is ongoing and pump tests on the remaining hydrocensus boreholes have already commenced. The findings of the assessments will be presented to the Environmental Monitoring Committee (yet to be established). **Proactive Measures:** • *"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".* o This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project. • *"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".* o SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. . A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense. • *"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the*

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		• **Indemnity for Structural Damage**: No undertaking to indemnify our client for damages to factory infrastructure caused by subsidence or vibrations has been offered. **3. Insurance and Financial Exposure** While you acknowledge potential impacts, your letter is silent on compensatory measures for our client's financial exposure due to exclusions in their current insurance policy. We require written confirmation that SRPM will indemnify our client for any losses, operational disruptions, or structural damages caused by mining activities. **4. Environmental Compliance** Your assurance of adherence to the Environmental, Social, and Governance (ESG) policy is noted. However, you have not addressed: • Whether the Environmental Authorization (EA) explicitly considers our client's property and borehole impacts. • Details on compliance with Section 24P of the National Environmental Management Act regarding financial provisioning for post-closure impacts. **5. Monitoring and Reporting** Your proposal for an independent monitoring committee is welcome. However: • **Committee Composition**: Clarity on its structure, decision-making authority, and the inclusion of our client's representatives is required. • **Regular Reporting**: A commitment to providing regular reports on borehole water quality, groundwater levels, and vibration impacts to our client is necessary. **6. Mitigation and Compensation Plans** Your letter lacks concrete commitments regarding the mitigation measures outlined in our objection letter, including: • Conducting a detailed assessment of the borehole and aquifer. • Establishing a timeline for implementing mitigation measures. • Providing written guarantees for compensation and alternative water sources. **7. Unaddressed Concerns** Several issues raised in our objection letter remain unaddressed, including: • Risks associated with mine water decant and acid mine drainage. • Contamination risks and long-term groundwater recovery timelines. • Inadequate financial provisioning for expanded operations and post-mining rehabilitation. **8. Request for Clarifications and Additional Information** We request clarity and further documentation on the following: • The scope and findings of the specialist investigations referenced in your letter. • Details of the proposed monitoring boreholes, including their locations and parameters to be monitored. • Specific measures to manage contamination risks from backfilled underground workings. • Updated financial guarantees in compliance with current regulations. Our client also informed us that someone named Ettienne, accompanied by an assistant, conducted a 12-hour test on their borehole. Unfortunately, the results of the test were not disclosed to our client. We shall appreciate it to receive a copy of the test results for our clent's records. **Conclusion** While we appreciate your willingness to engage constructively, we emphasize that our client requires binding commitments, specific mitigation measures, and transparent monitoring processes to ensure their property and operations are safeguarded. We request your detailed response to the above within **10 business days**. Failure to address these issues may necessitate our client exploring all available legal and administrative remedies. We shall also appreciate it if you could provide us (once it is ready for submission) of a copy of the Final Basic Assessment Report to be submitted to the DMPR			*baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".* ○ According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL. • *"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".* ○ As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B. • *"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".* ○ *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* ○ *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* **Water Supply Guarantees** SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. **Structural and Operational Integrity** The findings of the Blast and Vibration study has been detailed above. Other than the mitigation measures as recommended by the independent specialist. SRPM has compiled an Environmental monitoring and management Plan. The management measures as provided in the plan includes the following: Mitigation Action Plan • Follow recommended pillar and geometry mining span guidelines • Follow recommended support guidelines • Ensure vibration levels do not exceed guideline limits and achieve maximum vibration levels of 6 mm/s • Limit the length of round to 2.0m max at depths less than 50 m • Employ 8mm delay between shotholes Monitoring Action Plan • Conduct house surveys to establish the baseline • Install continuous monitors in four points around the relevant areas • Monitor vibration levels continuously **Insurance and Financial Exposure/Guarantees** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **Monitoring and Reporting** The hydrocensus boreholes (as Eurosales) will not be monitored on a monthly basis as these boreholes are noted as an equipped borehole which could result in damages to the infrastructure. For this reason, SRPM has identified five monitoring boreholes that will be used for operational monitoring. These boreholes provide a representation of the sample area. The monitoring results will be presented through the established environmental monitoring committee. The proposed operational monitoring boreholes has also been included in the WUL application to the DWS. The EMPr monitoring is set by the EA to be issued. Monitoring and reporting will be undertaken accordingly based on the conditions set forth in the EA. The frequency as stated has been Recommended in terms of compliance auditing has been recommended in the BAR.

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					In terms of the provision of the audit report, such request can be discussed further in the Environmental Monitoring committee. The committee composition will include SRPM Environmental and the Registered adjacent landowners. **Mitigation and Compensation Plans** • Mitigation measures and the progress this far has been detailed above. • Water supply Guarantees have been addressed above. **Unaddressed Concerns** These have been addressed above. **Request for Clarifications and Additional information** The Pump tests undertaken on the hydrocensus boreholes are currently underway. Once the study has been concluded such will be communicated to the landowners through the environmental monitoring committee. The details of the monitoring boreholes have been included as Figure 48 of the Basic Assessment Report. The parameters to be monitored will be aligned with the mines current operational monitoring programme which includes various parameters (Refer to Table 39 of the Basic Assessment Report). As part of this application SRPM is applying for a Section 21 g water use in terms of the NWA for the backfilling of the underground workings. A motivation for the GN704 Regulations in terms of the NWA. The rock formations at depth have poor primary porosity and low permeability. The rock itself is therefore suitable as the base prep. Permeability of the area increases where there are faults and joints present. It is through these features that the water in the deeper part of the aquifer flows. The area will be cleaned and mapped geologically to check the fracture frequency. If the fracturing is excessive, an alternative site with less fracturing will be identified to prevent any possible contamination. Conclusion It is our understanding that 10 working days is on the 31 January 2025. This submission was made on the 28 of January 2025. In terms of the FBAR, once submitted to the DMPR for consideration, the documents will be available on the AvDE website and registered Interested and Affected Parties will be informed of the submission.
3	Epol/Rainbow	I am writing to formally express our concerns about the proposed or ongoing mining activities beneath or near our feed mill building, located at 5 Barons Street Rustenburg. As stewards of this facility, which is critical to our operations, we have serious reservations about the potential impacts such activities may have on the structural integrity of the building and the surrounding environment. Our primary concerns are as follows: 1. **Structural Loads on a Small Footprint** The feed mill is designed to support high loads concentrated on a relatively small foundation footprint. Any disruption or alteration of the ground stability beneath this structure could significantly compromise its integrity. Mining activities, particularly those involving excavation, subsidence, or vibration, may worsen this risk and lead to potential damage to the building, posing a safety hazard to personnel and jeopardizing operations. 2. **Effect on Soil Water Levels** Mining activities often result in changes to local hydrology, including the reduction of groundwater levels. Such a reduction could lead to soil desiccation and settlement, further undermining the stability of the building's foundation. Given the precision engineering of the feed mill, even minor shifts in the subsurface conditions could have disproportionate effects on the facility's performance and longevity. Considering these we are committed to keeping open communication and working collaboratively to ensure that both parties can achieve their objectives without compromising safety or operational reliability. Please let us know a convenient time to discuss this matter further or provide additional information regarding the proposed activities and risk mitigation strategies.	**5 December 2024**	Email	Your concerns and comments on the proposed project have been noted and acknowledged by Alta van Dyk Environmental Consultants (Pty) Ltd and SRPM. The comments provided will be captured in the Comments and Response Report and Submitted to the DMPR for decision making. 1. Structural Loads on a small footprint A cross section has been included as part of this submission. The Epol Silo foundation has been noted to be 12m below surface. The Epol Silo including the boreholes (BH8 and BH9) are situated out of the mining limit line. The Epol Silo is situated 123m from the mining limit line and the boreholes (BH8 and BH9) are situated 100m from the mining limit. The 123m from mining limit is designed to act as a buffer to ensure the structural integrity of the Silo considering its sensitivity A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The report was made available as part of the Basic Assessment Report which was made available to Epol on 13 November 2024. The mine employs the bord and pillar mining operation method. Pillars are the solid blocks of ground that are not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75%, leaving 25% intact to limit surface subsidence. From a pillar perspective, numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction Ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellites to gather the data. The site will also implement a monitoring and management programme, which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms

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					of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) that are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. The empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec, which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. 2. Effect on Soil Water Levels The potential risk to the groundwater supply is noted. A geohydrological assessment was undertaken by an independent specialist to assess the potential impacts of the proposed Kwezi underground mine expansion on the groundwater water. The Geohydrological Assessment has been included as part of the Basic Assessment report. The mine plan has been undertaken with consideration to the Epol infrastructure. The boreholes situated on the premises as referenced in the Groundwater report are BH8 and BH9. The boreholes fall outside the mining blocks and has a lower risk. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there was no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface). ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over-conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this.Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH8 and BH9 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. Sibanye Stillwater has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water.

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					It is recommended as a potential impacted water user, that Epol monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model.
		Just a follow up on official document stating exclusion of any UG activities below the Epol site as discussed.	**18 December 2024**	Email	The below response was an email to the Interested and Affected Party. We are in the process of developing a response, which is unfortunately somewhat time consuming because of the various decision-makers that have to be consulted. We will be able to give you more definitive feedback by Friday 20 Dec. Please note that the process remains open, i.e., your right to lodge complaints or raise / reiterate objections remains open. It is important to note that a response was provided by Sibanye Stillwater on the 19 December 2024.
		Thank you for the below acknowledgement and take it that the requested extension I granted. As Rainbow we appreciate that there will be ongoing engagements between the parties and look forward to the additional results and any other pertinent information relevant to interested and affected parties.	**23 December 2024**	Email	Below is a response via email to the Interested and Affected Party. Sibanye Stillwater would like to emphasise that in the broader context, the process of discussions and communications remains open throughout. We are committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because we as a company want to remain true to our values. To facilitate this, we intend to set up a communications forum where we will be providing frequent feedback on our studies and the associated management and monitoring plans, hear concerns from interested and affected parties like yourselves, and so forth. More detail will be provided during the month of January 2025. A letter was also sent to Loren (Epol Representative) yesterday, which we hope addresses at least some of the concerns, at least in the interim. Please therefore feel free to raise concerns as and when you see fit. I hope this helps allay any fears you may have, but please let me know if you would like to discuss anything. <u>Content of the Letter Submitted to Epol by Sibanye Stillwater</u> <u>*RE: Assurance Regarding the Kwezi Shallow Operations*</u> *Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map). The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks* *A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. To clarify, under the scope of the current EA application, no mining activities will take place outside the defined boundaries of Blocks A and B.* *The risk mitigation efforts are guided by our commitment to protect the environment and the wellbeing of stakeholders in areas within which we operate as per our Environmental, Social and Governance (ESG) policy. SRPM have undertaken specialist investigations pertaining to the project to ensure that project impacts are avoided and minimised. To this effect:* • *SRPM undertakes to ensure that the dewatering of the aquifer is minimised and that borehole water availability is not impacted by the project by sealing any water intersections during mining. To monitor the groundwater related impacts of the project, SRPM will place five (5) monitoring boreholes around the project area , as per the specialist study recommendations, to continuously track ground water levels and ground water quality. SRPM undertakes to provide an alternative water supply for directly affected water boreholes should any impacts occur because of the Kwezi Shallows mining activities, subject to scientific investigations.* • *SRPM will place four (4) continuous blast monitors across the mine project area to monitor air blast and vibration. We commit to ensure that the USBM standard guideline limits of minimum 6 mm/s and maximum 25mm/s are not exceeded during project activities.* • *SRPM commits to follow the recommended pillar and geometry mining span guidelines to avoid any subsidence due to underground mining. In addition, SRPM will install surface subsidence monitoring stations to measure and monitor subsidence.* *SRPM commits to remain true to the values of Sibanye Stillwater by extending due care ensuring that the environment and stakeholders are not worse off due to mining activities. However, should you experience negative effects due to the project,*
		Thank you for the call as well as the presentation. As you are aware Sibanye's application is of great concern to Rainbow for reasons outlined in correspondence prior to the call of 12 Dec 2024 and on the call. Therefore, to ensure that we make a well-informed decision we will need to consult with our relevant experts. We have reached out to the said experts, and they are all current on holiday returning in the second week of Jan 2025, 7th and 8th Considering this Rainbow, as a recognised interest and affected party, requests a further extension to submit comments to the expansion of the mining rights area application to no later than 27 Jan 2025. This will afford us the opportunity to consult with external and internal stakeholders on the assessment report in support of the application, the presentation dated 12 Dec 2024 as well as review the updated ground water report (to be proved by Marius a Sibanye consultant as outlined on the call on 12 Dec 2024) to name just a few.	**19 December 2024**	Email	

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					SRPM will engage in a consultative process to identify root causes, corrective actions, and amicable solutions. SRPM is also proposing to set an independent monitoring committee up to ensure that the Kwezi Shallows project activities are monitored and reported to you and all other interested and affected parties.
		Thank you for your time today and for explaining the process and investigations that led to this point. As mentioned in the meeting, we understand that this expansion project will extend your shafts' lifetime, but we also need to ensure that it will not impact our operations. Just so you know, we produce +/-1200t feed per day and slaughter +/-350 000 chickens per day at the processing plant next door, which is a 24/7/365 operation. We also acknowledge that you will have to redo the mining application to exclude our premises from the application, as mentioned by Lesego you will be able to give in writing a confirmation that you will exclude UG mining activities beneath the Epol mill structure for any future expansion projects as discussed in the meeting. Will you please share the area you plan to exclude any UG activities on the map (as per the example) with the horizontal perimeters surrounding the mill? We will be at ease if regulation 17.7 will be exercised. Referring to the below, if the distance is more than 100m horizontally, no comment from the Chief Inspector of Mines is required. If it is less than 100m, a risk assessment must be done to ensure it is safe and submitted to the Chief Inspector for comment. STAATSKOERANT, 27 MEI 2011 No. 3430 17(7) The employer must take reasonable measures to ensure that - (a) no mining operations are carried out within a horizontal distance of 100 (one hundred) metres from ***reserve land,*** buildings, roads, railways, dams, waste dumps, or any other structure whatsoever including such structures beyond the mining boundaries, or any surface, which it may be necessary to protect in order to prevent any significant risk, unless a lesser distance has been determined safe by ***risk assessment*** and all restrictions and conditions determined in terms of the ***risk assessment*** are complied with; Once again thank you for your time and explanation of the processes involved. PS – May you please comment on the mail shared on 12 Nov'24 regarding the loads	**12 December 2024**	Email	A cross section has been included as part of this submission. The Epol Silo foundation has been noted to be 12m below surface. The Epol Silo including the boreholes (BH8 and BH9) are situated out of the mining limit line. The Epol Silo is situated 123m from the mining limit line and the boreholes (BH8 and BH9) are situated 100m from the mining limit. The Epol Perimeter is ~46m from the mining limit line. A Regulation 17 application in terms of the Mine Health and Safety Act was submitted on the 12 September 2024. The application is for the undertaking of mining within the 100m Regulated Area. The application was accompanied by a Risk Assessment. SRPM is currently awaiting feedback from the Principal Inspector as the process can only be concluded once a decision has been made by the DMPR on the EA process.
		Epol reiterated the following comments: ○ Required background on the project ○ Epol understands that the application is for the Mining Right, however Epol does not fall within the proposed mining blocks but within the greater area. How does this greater mining right area affect Epol. ○ Explanation of the process being undertaken ○ Concerning that the mining is 40m below surface, the weight of the building on the small footprint as the building is 12m below surface. Epol enquired if there are any plans to mine under the building: Epol enquired if there is a possibility that their operations be excluded from the application. Epol enquired if the basement of the Epol factory was considered. Epol advised that they comment on the current assessments and present the current findings to their business. Epol confirmed that they will comment on pre-application and not post application. Epol enquired if there is any guarantee that SS will not mining under their plant	**12 December 2024**	Teams Meeting	The minutes of the meeting has been included as part of this submission. The mine plan has been undertaken in such a manner that the Epol Silo has been excluded from Blocks A and B. There will be no undermining of the Epol operations. Subsequent to the meeting, a response was provided by Sibanye Stillwater on the 19 December 2024. The response has been included above.
		1. We write with reference to the above subject matter and the engagements between RCL Foods Consumer (Pty) Ltd t/a Rainbow Chicken ("Rainbow"), Sibanye Rustenburg Platinum Mines (Pty) Ltd ("Sibanye") and your offices to date.	**16 January 2025**	Email	Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) and Sibanye Rustenburg Platinum Mines (SRPM) acknowledge the submission as provided on the 16 January 2025. The submission together with the response will be included in the Final Basic Assessment Report and submitted to the Department of Mineral and Petroleum Resources (DMPR) for consideration in the decision-making process.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		2. Rainbow wishes to make particular reference to the virtual MS Teams call held on 12 December 2024 between representatives of all the parties, namely, Rainbow Alta van Dyk Consulting Group("AVD") and Sibanye (herein the "Call"). This correspondence does not seek to outline the entire discussion of the Call, but rather to focus and follow up on the concerns raised and requests made by Rainbow during the Call, as well as Sibanye and AVD's representations and commitments made in response thereto.			AvDE and SRPM acknowledge that a Focus Group Meeting was held on the 12 December 2024. Attached to this submission are the minutes of the meeting. The meeting recording and the presentation was made available to Rainbow, Loren Laker, on the 12 December 2024. The action items noted from the meeting includes the following: 1. SRPM to provide Rainbow with a written representation that the mining activities will not be undertaken below the Rainbow plant. a. SRPM provided a response on the 19 December 2024 indicating that The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. A layout plan was also attached to the submission clearly depicting that Epol/Rainbow falls out of the proposed mining areas. The following was agreed upon during the meeting: 1. Since the meeting was held on the 12 December 2024, Epol was granted an extension until the 8 January 2025 to provide additional comments that arose from the meeting. 2. The Geohydrological Assessment currently in the public domain remains the valid specialist report that shall be reviewed and commented on. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024.
		3. Rainbow records that notwithstanding that the initial public participation process ("PPP") in respect of the EA Application and its draft basic assessment report was stipulated by AVD to conclude on 13 December 2024. In the Call, numerous concerns regarding the EA Application were raised by Rainbow, and, in particular, the concerns with Sibanye's inclusion of Rainbow-owned and operated property in the EA Application footprint and the associated likely adverse impacts of blasting, Sibanye's plans to mine in close proximity to and under our building/s, and surface- and groundwater quality. In the Call, Sibanye and AVD committed to providing additional information to Rainbow and to granting Rainbow an extension on the PPP to properly comment on the EA Application documents and new information still to be received.			The Basic Assessment Process is undertaken in terms of the NEMA EIA regulation. The 30-day legislated timeframe is in line with Regulation 3 (1) 8. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024. On the 19 December 2024 Epol/Rainbow requested an extension of the timeframe that was agreed up during the meeting held on the 12 December. Epol/Rainbow requested an extension until the 27 January 2025. SRPM provided a response indicating that the process of discussions and communications remains open throughout. SRPM is committed to a continuous open, transparent, and fair process, not only because the legislative processes demand such, but also because SRPM as a company want to remain true to their values. To facilitate this, SRPM intends to set up a communications forum where they will be providing frequent feedback on their studies and the associated management and monitoring plans, hear concerns from interested and affected parties like Epol/Rainbow, and so forth. While SRPM promotes a continuous and open communication platform, a clear distinguishment must be made between the SRPM Communication Forms and the legislative required public engagement process. the extension of the public engagement process to the 27th of January 2025 is not feasible within the fixed legislative timeframe for the environmental authorisation application as a whole which is set forth and determined within the National Environmental Management Act. This results in the required cessation of the public engagement period and therefore the stakeholder comments that will be included within the application for regulatory authority consideration. Emphasis is however made on the fact that while the comment period for the environmental application process itself have closed that the communication form as set forth by SRPM remains open to promote ongoing engagement and the close out of questions or concerns regarding the project.
		4. Rainbow understands that, as a result of the above, the PPP for the EA Application is still underway. Save for Sibanye's letter dated 20 December 2024, Rainbow further notes that following the Call, and despite follow up requests, the information and documentation which Sibanye and AVD committed to providing, has not been received to-date. Rainbow would therefore like to formally follow up on the additional information and documentation, as fully outlined below, to enable Rainbow to properly consider and prepare its comments on the EA Application.			To date comments were received from Epol/Rainbow on the following dates: • 01 October, 12 November, 5 December and 12 December 2024. The comments provided were discussed during the meeting held on the 12 December 2024 between AvDE, Epol/Rainbow and Sibanye Stillwater. • In addition to the Focus Group Meeting a formal response submission will be provided to Epol/Rainbow upon the submission of the Final Basic Assessment Report to the DMPR. AvDE is confident that the stakeholder has had sufficient information to have had provided an informed comment on the application: • The geohydrological Assessment • The Blast and Vibration Assessment (which includes the geology aspects) • The Draft Basic Assessment Report The layout of Block A and B as discussed in the meeting held on the 12 December 2024
		5. In order to participate meaningfully as a registered interested and affected party and to be provided with all relevant information in respect of the EA Application and Sibanye's proposed activities, Rainbow requested and hereby follows up on its request that Sibanye provide the following information and documentation: - a. Geotechnical Reports which include data indicating (i) the distance from the edge of the mining Blocks A&B and Rainbow's building/s situated and described as Erf 2539, Erf 1/2312 and Erf 7164; and (ii) the potential impacts on soil; b. Confirmation of all regulatory restrictions, buffers and relevant approvals needed for mining in close proximity to existing structures; and			In terms of the requested documents: a. The Blast and Vibration assessment has been provided as part of the Basic Assessment Process whereby the geology of the study area is also discussed. The impacts assisted with subsidence and erosion has been included in Table 7-1 of the report. Reference to Epol/Rainbow in terms of the subsidence has been included on Page 21. The Blast and Vibration assessment revealed the following: a. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and

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		c. Updated ground level water drawdown data ensuring that accurate data is considered in the assessment of boreholes 8 and 9, privately owned by Rainbow.			Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor SCF for each individual pillar. From the risk classification, the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. b. The Reg 17 application in terms of Mine Health and safety obligations was submitted on 12 September 2024 to the Department of Mineral and Petroleum Resources (DMPR). In terms of the buffers associated with the National Water Act (100m from a watercourse and 500m from a delineated wetland), such buffers have been considered as part of the application, hence a Water Use License Application Process is currently underway with the Department of Water and Sanitation. In addition, a Freshwater Assessment has been commissioned as part of the application which assessed the potential impacts associated with the underground mining activities in relation to the delineated watercourses. The Freshwater Assessment has been included as Part of the Basic Assessment Report. In terms of NEMA and NEMWA, there are no buffer requirements in terms of this application. As previously mentioned, the geohydrological assessment report currently in the public domain remains the valid specialist report for review and comment. This report has taken into consideration Boreholes 8 and 9 as well as the groundwater drawdown. The project team takes note that during the meeting held on the 12 December 2024, there were discussion that any updates to the report will be as a result of the SRPM monitoring and management plan which will be discussed and shared with I&APs through the established and recognised forums/committees.
		6. Rainbow understands that, pursuant to the Environmental Impact Assessment regulations, registered interested and affected parties must be provided at least 30 days to review and comment on information and documentation related to the EA Application, including any new information provided by Sibanye in accordance with the above application.			The Basic Assessment Process is undertaken in terms of the NEMA EIA regulation. The 30-day legislated timeframe is in line with Regulation 3 (1) 8. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024. On the 12 December 2024, a Focus Group Meeting was held with Epol/Rainbow to address some of the comments raised and to provide the opportunity for the AvDE and SRPM team to discuss the project. Although the meeting was held into the latter part of the legislated 30 day comment period, no new project information supporting the project has been available in support of the project. On the 19 December 2024 Epol/Rainbow requested an extension of the timeframe that was agreed up during the meeting held on the 12 December. Epol/Rainbow requested an extension until the 27 January 2024. SRPM provided a response indicating that the process of discussions and communications remains open throughout. SRPM is committed to a continuous open, transparent, and fair process, not only because the legislative processes demand such, but also because SRPM as a company want to remain true to their values.
4	Cemblocks	Could you kindly provide a specific time for the resolution of your comments? I need to decide on whether to object to your application and unfortunately, we cannot try with an indefinite waiting period under the pretext of ongoing investigations.	**05 December 2024**	Email	The following response was provided by SRPM to the Interested and Affected Party. To illustrate that it is not an open-ended matter: 1. We have internal planning sessions in the days up to 13 December to define the solutions to all water management concerns. 2. Those will be consolidated as part of the Monitoring and Management Plan, which in turn is a requirement for our submission of the Final Basic Assessment Report, which is due to be submitted on 24 Jan 2025 for the Environmental Evaluation (EA) process. We need this plan to be acceptable, as otherwise it will jeoprdise the EA process, which we want to avoid at all costs. 3. We will arrange a feedback session to discuss the M&M plan with landowners (you included) in January 2025 after the December break. I am sure more detailed arrangements will be communicated with you by Kirthi and team in the build-up to / as part of the above (as referred to in her email below). My point is just that we cannot afford not to take your concerns seriously and will therefore not be dragging our feet. I hope this helps alleviate your concerns, but please feel free to contact me should you have further concerns or need more detail. In addition to the response above, it is important to note that the project team will be responding to each I&AP rather than a Focus Group Meeting. Sibanye Stillwater is committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because as a company they want to remain true to their values. To facilitate this, SRPM intends to set up a communications forum where they will be providing frequent feedback on their studies and the associated management and monitoring plans, hear concerns from interested and affected parties. As an I&AP Cemblocks are able to continuously engage with the project team. Once the DMPR issues a decision on the application, Cemblocks will be informed of the decision. The appeal process allows stakeholders to raise their comments/objections directly with the regulatory authority.

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		We have still not received any documentation about the mine's commitment to our water supply. As discussed during the meeting, there were only 29 registered boreholes that needed to be handled separately. We must stress that if you do not honour your commitment, we will be forced to object in the strongest possible terms. Please note that our objection will be managed by Rooslaw Attorneys in Johannesburg. Additionally, I have not had anyone visit our office about our second borehole, which was not included on the list.			The response below has been included as part of the email that was sent to the Interested and Affected Party. The comments provided during the meeting as well as the commitment from Sibanye Stillwater is acknowledged. The project team is currently working on the monitoring and management plan, which will be communicated and shared with Interested and Affected Parties. In terms of the additional borehole, the request has been acknowledged and included in the groundwater study under Section 4.2.2. The Hydrogeologist will be in contact with you regarding your availability to come through to assess the second borehole. The Environmental Management and Monitoring Plan has since been compiled shared with the Interested and Affected Party as part of the submission.
		To Whom It May Concern, I am writing on behalf of the following entities to formally object to the proposed amendment of Mining Right NW 80 MR and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A & B): 1. **Cemblocks Pty Ltd** Address: 18 Vanadium Street, Rustenburg 2. **Formscaff (Part of the WACO International Group)** Address: No. 3 Ferro Street, Rustenburg 3. **Bafokeng Properties** Address: 20 and 21 Vanadium Street, Rustenburg My name is Francois Alberts, and I will be the representative for these businesses in this matter. All correspondence can be directed to my email address: nfa@cemblocks.co.za, my cell number: **082 447 8334**, or via our office line at **014 538 0311**. **Grounds for Objection:** 1. **Water Supply Concerns** The entities mentioned above are not receiving any water supply from the Rustenburg Local Municipality and are entirely dependent on boreholes for their operations. Mining activities in this area will likely have a significant impact on the water table, jeopardizing our ability to access this critical resource. ○ **Cemblocks Pty Ltd** has been operating at this site for over 42 years, employing more than 170 people. Our business cannot survive without a reliable water supply, as water is essential for producing our products. ○ **Bafokeng Properties** faces similar challenges, as the operations of plants on their properties depend heavily on borehole water. 2. **Lack of Guarantees and Responsibility** No guarantees have been if mining activities will not negatively impact the water supply. Until there is a legally binding agreement in place where the mine accepts full responsibility for ensuring our continued access to water—whether through boreholes or alternative means—we cannot support this project. **Request for Resolution:** We urge you to address these concerns and provide detailed guarantees that: • Mining operations will not disrupt or deplete our water supply. • The mining company will take full responsibility for mitigating any negative impact on our water access, including providing alternative sources if borehole water is affected. Without such assurances, we remain firmly opposed to the proposed mining activities in this area. Thank you for your attention to this matter. Please confirm receipt of this objection and provide updates on the next steps.	**13 December 2024**	Email	<u>Acknowledgment of the Objection</u> AvDE acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>Groundwater Impact Assessment</u> A geohydrological assessment was commissioned as part of the Basic Assessment Process. The geohydrological report formed part of the Basic Assessment Report. The borehole situated on the premises as referenced in the Groundwater report is BH4. This borehole is 740m from the closest proposed mining block. The borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the conservative scenario the borehole will not dry up. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH4 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Rustenburg Cemblocks monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. <u>Alternative water sources</u> SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense.
5	DupWest Inc.	As a landowner within the heavy industrial precinct of Extension-9, Rustenburg, our clients have become aware of the intended plans for underground mining activities beneath this area. Such intended underground mining activities pose a significant threat to the integrity of factory structures, particularly concerning foundational stability. This situation not only jeopardizes the structural integrity but also raises serious human safety concerns. The local authority overseeing this area is the Rustenburg Local Municipality. The building plans regarding our clients' property received approval on February 18, 1988, with endorsements from the Town Planner, Chief Health Inspector, Chief Fire Inspector, Building Inspector, and Town Engineer. The architect responsible for these designs was Paul van Straten, a distinguished building consultant. It is important to note that the natural ground conditions were deemed unsuitable for construction, necessitating the removal of the existing turf. Trial excavations were conducted to ascertain the depth of the norite base, leading to the	**6 December 2024**	Email	<u>Acknowledgement of Comments</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>Baseline Environment</u> The description of the baseline environment is noted and acknowledged by Sibanye Stillwater. It is the understanding of the project team members that the Rustenburg area is uniform with norite soil where various business and mining activities already exist. SRPM has taken into consideration the baseline environment and the nature of the geology and soils. <u>Consultation with the Rustenburg Local Municipality</u>

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		complete removal of the turf and the introduction of imported backfill. Dump rock was brought in, and roller compaction was executed in layers of 200mm, with compaction tests submitted for the approval of both the building inspector and the architect, who duly signed off on the work. All excavated soil was transported off-site. A high probability exists that the intended underground mining activities will have a destabilizing and damaging effect on the underground conditions supporting the current structures erected on the surface of the property. It is emphasized that the building regulations were rigorously enforced, ensuring that no construction could commence without explicit clearance from the building inspector and the architect's approval, which was duly obtained by our clients. The Rustenburg Local Municipality has designated the relevant area for industrial development and has sold the property for intended factory construction, all while adhering to stringent building regulations. It is crucial to recognize that all architectural and engineering designs received the necessary approvals from the Municipality, yet there appears to be a lack of awareness regarding the potential underground disturbances that may arise because of the intended underground mining activities. These disturbances could lead to water infiltration, mining activities, blasting, vent fan drilling, and dust pollution. Such manmade interventions threaten to compromise the foundational stability of the structures, resulting in inevitable damage over time. To mitigate prolonged disputes that could lead to the deterioration of private assets, legal repercussions, and tenant disturbances, our clients would be amendable to a strategic approach. It would serve all parties' interests for the relevant property to be acquired by the interested parties at market-appropriate prices, complemented by the necessary civil groundwork. Furthermore, the Rustenburg Local Municipality bears the responsibility of safeguarding its infrastructure, which include roads, electrical systems, water pipes, and sewer lines. Should the water pipes contain asbestos, and the sewer systems be constructed of clay, these issues must be addressed with due diligence, and appropriate evidence must be presented in this regard.			As par of the Basic Assessment Process, the Rustenburg Local Municipality Integrated Environmental Management Unit was consulted and provided comments on the proposed expansion activities. Other than the EA process, SRPM has ongoing engagement with the RLM regarding Land and Property Management Affairs. <u>Structural and Operational Risks</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. <u>Property Management</u> Sibanye Stillwater is not currently considering purchasing any properties in the area of operations but could consider doing so in future. The Vibration and Stability assessment undertaken, took into account all the relevant and prevailing conditions and indicate a negligible risk of any structural damage. <u>Infrastructure</u> As part of the mine planning exercise, SRPM has taken into account sensitive infrastructure within the mining limit and associated buffers. Mitigation measures such as monitors will be put in place. The findings of the Blast and Vibration study has been detailed above. Other than the mitigation measures as recommended by the independent specialist. SRPM has compiled an Environmental monitoring and management Plan. The management measures as provided in the plan includes the following: Mitigation Action Plan • Follow recommended pillar and geometry mining span guidelines • Follow recommended support guidelines • Ensure vibration levels do not exceed guideline limits and achieve maximum vibration levels of 6 mm/s • Limit the length of round to 2.0m max at depths less than 50 m • Employ 8mm delay between shotholes Monitoring Action Plan • Conduct house surveys to establish the baseline • Install continuous monitors in four points around the relevant areas • Monitor vibration levels continuously

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		Without prejudice to our rights Due to borehole and groundwater reports done, we are against any mining activities in and around our property Waterflex (Pty) Ltd and Flex Selfstorage. The loss of our borehole and clean water will create millions of rands of damage. We keep our rights for further reasons, not to mine.	**11 December 2024**	Email	The below email was sent through the Interested and Affected Party. Thank you for your email. The comment provided has been noted and the project team will be providing you with a formal response. In addition, the team is working towards addressing them. Sibanye Stillwater are finalising a Monitoring and Management Plan, and a Focus Group Meeting will be set up for January 2025 to provide feedback. The Environmental Management and Monitoring Plan has since been compiled shared with the Interested and Affected Party as part of the submission.
6	Arthur Cockcroft	Due to the timeline to comment on mining in Rustenburg Extention 9, the appointment of experts to advise us in such a short time and request the date for comments on 13 December 2024 will be extended to 13 February 2025to give us a chance to make out a proper case.	**11 December 2024**	Email	The Basic Assessment process for the above-mentioned project has been undertaking in terms of the National Environmental Management Act (107 of 199) EIA Regulations (2014). The 30-day comment period is defined by the EIA Regulations and not the appointed Environmental Assessment Practitioner or the Applicant. Reference is made to Regulation 19 (1) a of the EIA Regulations (2014): *19. Submission of the basic assessment report and supporting documents to the competent authority. —* *(1) Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, give to the competent authority—* *a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority; or* The applicant has 90 days from the submission of the Draft Basic Assessment Report and Application Form to submit the Final Basic Assessment Report to the Department of Mineral and Petroleum Resources (DMPR), hence the due date for comment of 13 December 2024 remains. The project team has noted the comments and concerns raised, and the team is working towards addressing them. Sibanye Stillwater are in the process of finalising a Monitoring and Management plan and a Focus Group Meeting will be set up for January 2025 to provide feedback. In addition to the response above, it is important to note that the project team will be responding to each I&AP rather than a Focus Group Meeting. Sibanye Stillwater is committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because as a company they want to remain true to their values The Environmental Management and Monitoring Plan has since been compiled shared with the Interested and Affected Party as part of the submission.
		Good day Your e-mail dated 20 December 2024 refers. Can you please answer my concerns point by point, one to eighteen, and then I will reply preferably in Afrikaans. Sibanye Mine Extension 9, Rustenburg Objection To Mine Under Our Property 7 Brons Street, Rustenburg, Extension 9 1. Due to the risk of damages to our buildings as the result of vibrations. 2. In the long term the risk of sink holes. 3. The lack of insurance that are not willing to insure our buildings on shallow mining. 4. The cut off our boreholes in full. 5. The pollution of groundwater that we use daily to keep our businesses running 6. The risk of losing tenants, for example we have a water bottling factory as tenant 7. The risk of damages in the next 100 years no responsibility. 8. Bad mining practices if we look at the filthy yards and open spaces of Semenya. 9. The isolation of boreholes is unacceptable, not practical and won't work. We cannot accept it. 10. The transfer of responsibility cannot happen and in case of mining Sibanye must stay responsible for the next 100 years. A trust with enough money to buy us all out must be created as security. 11. Legal and professional costs must be paid by Sibanye. 12. There is no guarantee with the necessary backing that buildings will not crack in the short- and long term. 13. If boreholes and ground water are affected, there is no workable and acceptable plan to restore it.	**2 January 2025**	Email	Acknowledgment of the Objection Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. **Response 1** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South

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		14. Thousands of jobs will be lost if the shallow mining affects the properties in the area marked for mining. 15. There were no independent advisors to balance the arguments on the meeting 6 November 2024. All advisors paid by Sibanye. 16. There is no buyout agreement in case Sibanye mining activity cut off or pollute our ground water.Ground water is our lifeline of survival in an area with very bad services from the Municipality. 17. There was no consultation with us regarding mining under our premises and our rights. 18. We state categorically that mining will pollute our ground water and cut it off. In case it happens the advisers and investigators and impact study companies must be held responsible as well as directors of all companies and mining company that are involved in the whole operation. Possible damages by mining under Extension 9: 1. Insurance fall away for land owners. 2. Ground water will be cut off. 3. We will lose tenants. 4. Operations on some properties will come to a standstill. 5. +/- 10,000 jobs will be lost-			African guidelines in terms of maximum allowable PPV's refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment **Specific Blast Vibration Limits and Safety Protocols** The mine has set standards for drilling and blasting practices that are employed in the operations. Blasting is undertaken as per a blast design. Blasting protocols for the operations are three blasts a day at set specific times. The blast lengths in this project have been reduced to 2.0 m maximum for the specific project and a lower density explosive will also be utilised to reduce the effects of blast vibrations. A 8milli second delay will be deployed to ensure that shot holes are not fired concurrently that could increase the PPV's during blasting. The blast vibration limits that will be deployed in the project area are as per the USBM limits. See Table 5.1 page 21 Kroondal West, Blast and Stability Assessment. **Response 2** In terms of sinkholes, mining has been conducted up to the 40.0 m zone to the East of the existing Kwezi Shaft and no history of subsidence or sink holes were reported and recorded to date. Sinkholes are specific to the dolomitic rock formation which is not present in the Rustenburg area. The nature of the geology in the area does not warrant sinkholes. **Response 3** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **Response 4** The Waterflex and Flex Self Storage bore hole is referred to as BH7 in the Geohydrological Report. Borehole BH7 is within the proposed mining block as proposed as part of the application. However, due to the availability of the UG2 Reef, the mining limit is 48.2m from BH7. This means that the borehole will not be undermined. The mining limit serves as a pillar in terms of safeguarding the borehole. Refer to the cross section as provided as part of this submission. **Response 5** It is very unlikely that the borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow at BH7 is north-east, towards the mining area According to the geohydrological investigation, it is very unlikely that the borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow at BH7 is north-east, towards the mining area. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).

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					 A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceed the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. ○ The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place. • The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values. • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The expected quality of water that leach through this material is expected to be good quality as explained below. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards. With reference to the table below, the modelling results are as follows: • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids. • Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system. • Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water. Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity. The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below. **Parameter** | **RPM WUL 2018** | **Drinking Water** | **Underground Mine Void** pH | **6-9.5** | **≥5 to ≤9.7** | 7.8 Total Dissolved Solids | | **≤1 200** | 740

Nr.	Organisation/Commentator	Comment	Date	Source	Response

Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

Response 6

Based on the studies undertaken and the mitigation measure, it is unlikely that the water supply will be disrupted.
SRPM's responsibility is to ensure that it does not impact negatively on the water users. SS has strategies for monitoring in place and alternative water resources.

SRPM recognizes its responsibility to mitigate any negative impact on water users and properties within its scope of influence. It has established strategies for monitoring, management and ensuring the availability of alternative water resources where necessary. However, it is important to acknowledge that the performance and success of any business are influenced by a range of external factors beyond SRPM's direct responsibility or involvement. Particularly when these factors interact cumulatively, they must be carefully considered in the broader context of the I&APs company's operations

In addition, in terms of the bottling business, AvDE would like to bring to the attention of the I&AP that the utilisation of water in this manner is not permissible under schedule 1 and therefore requires a water use licence.

Response 7

SRPM will implement an Environmental Management and Monitoring Plan, the current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area.

SRPM has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary.

The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water.

Guarantee

SRPM is investigating options to address the matter and they we will reach out as soon as we have information.

Response 8

Mining practices are undertaken in line with the EMPr and WUL and audited accordingly which includes good house keeping practices of which the compliance and non-compliance is provided to the DMPR and made available. Cognisance should be given to the fact that the nature of a mining site means it may not have the polished appearance of other environments however it aims to be well maintained ensuring a safe and functional environment.

Response 9

Trained professionals in the field have put forth the mitigation measures. It is essential that the project team, stakeholders and competent authority trust the expertise of the professional and their informed advice. Field observations have shown that BH12 is 50m from existing mining and is not impacted in any way. If the borehole is damaged in any way it will be replaced, or an alternative water supply will be provided.

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					The Waterflex and Flex Self Storage bore hole is referred to as BH7 in the Geohydrological Report. Borehole BH7 is within the proposed mining block as proposed as part of the application. However, due to the availability of the UG2 Reef, the mining limit is 48.2m from BH7. This means that the borehole will not be undermined. The mining limit serves as a pillar in terms of safeguarding the borehole. Refer to the cross section as provided as part of this submission. <u>Response 10</u> Guarantee SRPM is investigating options to address the matter and they we will reach out as soon as we have information. The financial guarantee undertaken sets aside funds for closure and monitoring. The guarantee is not to buy the stakeholder out but to ensure that any environmental impact is addressed. <u>Response 11</u> The EA process, specialist studies, monitoring and auditing is the financial liability of SS. <u>Response 12</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment <u>Response 13</u> SRPM will implement an Environmental Management and Monitoring Plan, the current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SRPM has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water.

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					It is recommended as a potential impacted water user, that Water flex monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. <u>Response 14</u> SRPM recognizes its responsibility to mitigate any negative impact on water users and properties within its scope of influence. It has established strategies for monitoring, management and ensuring the availability of alternative water resources where necessary. However, it is important to acknowledge that the performance and success of any business are influenced by a range of external factors beyond SRPM's direct responsibility or involvement. Particularly when these factors interact cumulatively, they must be carefully considered in the broader context of the I&APs company's operations <u>Response 15</u> At the meeting held on the 6 November, the appointed EAP from Alta van Dyk Environmental and the Geohydrologist were present during the meeting. The EAP as well as the appointed specialist are and remain independent. Independence in this context refers to the EAPs and specialists' ability to provide accurate, impartial and objective findings free of any influence that might compromise the integrity of their professional judgement regardless of the fact of being compensated by the client. The professional independence is rooted in providing honest expert guidance. As an EAP, declarations are signed and submitted to the DMRE supporting our independence. AvDE and Specialist has no vested interest in the project. <u>Response 16</u> SRPM will implement an Environmental Management and Monitoring Plan, the current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SRPM has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. Sibanye Stillwater is unable to comment on service delivery issues with the RLM. Comments on service delivery must directed to the relevant authority. <u>Response 17</u> Basic Assessment Process has been undertaken in terms of the NEMA EIA Regulations (2014). The EIA Regulations makes provision for consultation with Interested and Affected Parties as well as landowners. The public participation process has been undertaken in line with Regulation 41 of the EIA Regulations. In terms of the Public Participation process following has been undertaken this far: • Site notices were placed on site and within areas in close proximity to the proposed site. Site notices were placed on the 3rd September and 12 September 2024. • A Background Information Document's ("BID") was compiled and distributed electronically via email to adjacent landowners and all identified stakeholders. The Hard copy of the BID BID was distributed on 3 and 12 September 2024. • A notification letter was distributed to inform stakeholders about the proposed extension • A Focus group meeting was held on the 6 of November 2024, with the landowners that provided comments ○ According to the attendance register records, Waterflex was present at the meeting. • A newspaper advertisement was placed in the in the Rustenburg Herald newspaper on the 13 November 2024 edition announcing the availability of the Draft BAR • The Draft BAR was available for public comment for a period of 30 days from 14 November until 13 December 2024: ○ Rustenburg Local Library ○ Kwezi Shaft Security Offices ○ Alta van Dyk Environmental Consultants Office ○ The Sibanye Stillwater data free app ULWAZI: https://ulwazi.datafree.co. ○ Electronically on the AVDE website: https://www.altavandykenvironmental.co.za/public-documents/ • Notification emails and letters were sent to I&APs on the 13 November 2024, informing them on the availability of the Draft Report. Based on the above, Waterflex has been informed and consulted on the proposed underground expansion activities. <u>Response 18</u>

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					Environmental liability will lie solely with SS and enforced through the issuance of the EA and WUL. SS has various aspects in place in which it ensures that its possible impacts are financially covered in terms of quantification, preventative measure implementation, mitigatory measure implementation, monitoring, auditing and rehabilitation. This financial estimation is reflected within the financial provisioning as well as annual budgets allocations. The onus is on the DMPR and DWS to provide a positive or negative decision. The specialist and the EAP are only responsible for providing the findings of the independent studies and driving public engagement between stakeholders and the client. The EAPS responsibility is therefore solely embedded in impact quantification, mitigation measure development and bridging the communication gap between stakeholder, the applicant and the competent authorities. The EAP and specialist remain independent from the project and client and therefore cannot be held responsible for the realisation of impacts.
7	Rustenburg Galvanizers	Rustenburg Galvanizers a Division of Inzinc Africa owns property at 12 Ferro Street Rustenburg (RE/2517) where we employ around 100 people and operate a galvanising plant. As a sustainable business which has been in existence for almost two decades, we would like to register our strongest opposition to the planned shallow mining activities below us as follows: • We are convinced that the mining activities will compromise the stability of geographical structures below us, which in turn will introduce risk of structural damage to our structurally sensitive chemical tanks and Zinc kettle. • Our building structures will, due to the same argument, be compromised and exposed to structural integrity risk. • The above puts our total capital investment at risk and introduces business sustainability/continuity at risk. • Mining activities below us will dilute our capital investment as potential buyers will be hesitant to invest in or purchase our business. • Insurance companies will be unwilling to insure us with shallow mining below us. • We are dependent on a steady water supply and are not receiving this from the local municipality. We are now dependent on our borehole to ensure that we can continue with production. The shallow mining will destroy our water supply and render our business un-operable and possibly worthless. • Should the borehole not dry up, any water supply that we may still have, will be contaminated, rendering it unsuitable for our use. This may cause a possible business collapse. • Given the history, as well as the current inability of mining in South Africa, to rehabilitate end-of-life mines and to secure them (refer to the latest illegal mining in SA) the above risk may exponentially increase for us after the mine has moved on in a few years from now. An extrapolation of current SA illegal mining scenarios will see us ending up with the chaos that illegal mining below us will bring, with no one to engage with as recourse or to hold accountable as the mine would have moved on. Please note our intention to continue to oppose this planned expansion in any way possible as the risks introduced by this planned shallow mining expansion hold inherent capital investment dilution and business feasibility/sustainability/continuity risks for us as well as job security risks for around 100 employees from this community.	**12 December 2024**	Email	<u>Acknowledgment of the Objection</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>Structural and Operational Risks</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment <u>Liability in terms of the Mining Activities. Insurance</u> SRPM is investigating options to address the matter and they we will reach out as soon as we have information. <u>Livelihood</u> SRPM recognizes its responsibility to mitigate any negative impact on water users and properties within its scope of influence. It has established strategies for monitoring, management and ensuring the availability of alternative water resources where necessary. However, it is important to acknowledge that the performance and success of any business are

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					influenced by a range of external factors beyond SRPM's direct responsibility or involvement. Particularly when these factors interact cumulatively, they must be carefully considered in the broader context of the I&APs company's operations. <u>Water Supply</u> A geohydrological assessment was commissioned as part of the Basic Assessment Process. The geohydrological report formed part of the Basic Assessment Report. The borehole situated on the premises as referenced in the Groundwater report is BH14. This borehole is 350m from the closest proposed mining block. The borehole falls outside the mining blocks and has a lower risk. Groundwater modelling has indicated that even in the conservative scenario the borehole will not dry up. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH14 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SRPM has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Rustenburg Galvanisers monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. <u>Water Quality</u> According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).  A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceed the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. ○ The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place.

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- The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values.
- The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity.
- The expected quality of water that leach through this material is expected to be good quality as explained below.

The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards.

With reference to the table below, the modelling results are as follows:

- The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity.
- The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids.
- Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system.
- Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water.

Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity.

The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

<u>Rehabilitation</u>

Environmental liability will lie solely with SRPM and enforced through the issuance of the EA and WUL. SS has various aspects in place in which it ensures that its possible impacts are financially covered in terms of quantification, preventative measure implementation, mitigatory measure implementation, monitoring, auditing and rehabilitation. This financial estimation is reflected within the financial provisioning as well as annual budgets allocations.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					Under no circumstances shall SRPM be compared to other mining companies. Each company has different mining strategies and implementations teams, which ultimately leads to how the mine operates during the closure phase. Rehabilitation strategies are in place and post closure monitoring and the sign off of closure certificates. It is important to note that closure planning begins in the early stages of the mine's development and life and is updated regularly throughout the life of each mining operation. This process entails an extensive analysis of land use options, environmental factors and community concerns and objectives. Illegal mining presents a growing risk to the sustainability of the mining industry in South Africa. It undermines the rule of law and property rights, degrading the state's ability to attract investment and meet its developmental goals. Illegal mining remains a national concern and continues to manifest. The South African Police Service (SAPS) have various units to help fight crime. The Directorate for Priority Crime Investigation (DPCI), known as the Hawks, targets organized crime, economic crime, and corruption, and are, therefore, an important ally in combatting illegal mining. Separate to the Hawks, the SAPS has the Crime Intelligence Division, which is the intelligence agency within the SAPS. Another unit in the SAPS is the Special Task Force (STF), an elite police tactical unit. Additionally, the SAPS has a dog unit (K9). Sibanye Stillwater collaborates with these entities, as well as with local police stations and with other external security companies to disrupt the operations of illegal miners and criminal syndicates, retrieve their property, and apprehend suspects. Currently there is no illegal mining at the Kwezi Shaft and SRPM is taking all measures to ensure that this area is not affected.
8	Moosa Suliman	Objection: Sibanye Shallow Mining As a concerned property owner in the Zinniaville Industrial area, I would like to object to the shallow mining by Sibanye. This mining operation poses a risk to our property in terms of ground water seepage and pollution and poses a risk to cracks in our buildings creating poor structural integrity. These structural failures may result in our insurance companies not covering these damages. As a land and property owner, I cannot be held responsible for the damage caused by your mining operations.	**13 December 2024**	Email	<u>Acknowledgment of the Objection</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>Groundwater Quality</u> A geohydrological assessment was commissioned as part of the Basic Assessment Process. The geohydrological report formed part of the Basic Assessment Report. According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).  A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceed the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. ○ The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place.

Nr.	Organisation/Commentator	Comment	Date	Source	Response

- The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values.
- The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity.
- The expected quality of water that leach through this material is expected to be good quality as explained below.

The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards.

With reference to the table below, the modelling results are as follows:

- The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity.
- The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids.
- Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system.
- Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water.

Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity.

The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

<u>Management and Monitoring Plan</u>

The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision,

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis. The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives. The WUL application is a parallel process also been undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance. <u>Structural and Operational Risks</u> A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak particle velocities (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. <u>Liability in terms of the Mining Activities</u> SRPM is investigating options to address the matter and they we will reach out as soon as we have information.
9	Rustenburg Engineering and Foundry	RE: Objection to Kwezi Shallow Mining Application EXT 9 We at Rustenburg Engineering & Foundry (Pty) Ltd object to the Kwezi Shallow Mining Application EXT 9. Our properties are situated at: Stand 2190 Portion_2 Stand 2190 2190 Portion_1 Stand 2191 Our objection is due to potential damage to buildings, and possible sinkholes caused by the shallow mining activities and the pollution of natural groundwater.	**13 December 2024**	Email	<u>Acknowledgment of the Objection</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>Groundwater Quality</u> A geohydrological assessment was commissioned as part of the Basic Assessment Process. The geohydrological report formed part of the Basic Assessment Report. According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					 A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceed the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. ○ The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place. • The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values. • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The expected quality of water that leach through this material is expected to be good quality as explained below. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards. With reference to the table below, the modelling results are as follows: • The model results for the underground mine voids, indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The model sulphate concentration is below regulatory guideline values, i.e SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids. • Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system. • Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water. Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity. The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241

Nr.	Organisation/Commentator	Comment	Date	Source	Response

Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001
Manganese		**≤0.4**	<0.001
Nickel		**≤0.07**	0.001
Molybdenum			0.001

Management and Monitoring Plan

The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision, the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis.

The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives.

The WUL application is a parallel process also been undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance.

Structural and Operational Risks

A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report.

The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment.

In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment.

Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. The site will also implement a monitoring and management programme which will include Light Detection and Ranging (LIDAR) for subsidence monitoring.

In terms of Blast and vibration, blasting will be undertaken as part of the mining activities.
Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak particle velocities (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment.

In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. According to the Empirical and theoretical calculations for the proposed blasting indicated that

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					the PPV causes is well below the 6 mm/sec which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. <u>Liability in terms of the Mining Activities</u> SRPM is investigating options to address the matter and they we will reach out as soon as we have information.
10	Letlhogonolo Motlhanke	My project not doing well and you to help me to get more clients.			
11	Lerato Mphafudi	I think this project will benefit a lot of people will have an idea of what's going on around them			
12	Ntswaki Margret Baile	I have no comment.im just an 24year old who is oppressed by hunger, who is desperately needing a job.im a hard worker and I can learn fast. Please can you find it in your heart and hear my cry by just hiring me ..my numbers are0713448000			
13	Simamkele Nyenyiso	I would like to be your part of your employer			
14	Noncedo Nobula	I'm looking for a job			
15	Thabo Pitsonyane	General worker			
16	Bonolo Sedumedi	I would like to comment about the project. I think that is going to bring change to the Kwezi Shaft and the community. The project will help the workers to be promoted and will open more vacancies for other people. This project will bring more opportunities and new skills. I believe that these projects must procced.		Ulwazi	The mining sector plays a crucial role in the Rustenburg Local Municipality economy. Sibanye-Stillwater of which Rustenburg Platinum Mines is a subsidiary, employs more than 90 000 people making them the country's largest employer outside of government. In terms of job opportunities related to the specific project, the mine has various channels through which benefits to local communities are realised. This includes local employment and inclusive procurement, commitments made in terms of the mine's approved Social Labour Plan programmes. Additional job opportunities could become available as mining operations are ramped up. Sibanye-Stillwater will communicate job opportunities through the various existing recruitment structures.
17	Rosinah Banda	It's going to give an impact			
18	Mmapaseka Majila	I would like to be a part of this Project, if I could participate in it. I would appreciate if you could reply soon Thank You.			
19	Allie Sejeso	Hi please give me job for Minecraft			
20	Allie Sejeso	Please give people of Carletonville job			
21	Olwenkosi Mcephe	I need a job any job that is open I am a bread winner but now I am not employed			
22	Tankiso Phuka	Yes will need a job			

Kirthi Peramaul

From: Joachim Prinsloo
Sent: Tuesday, 01 October 2024 17:02
To: kirthi@avde.co.za
Cc: Pramarshen Perumal; Florence Mbazo
Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area
Attachments: Registration.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good day Kirthi

Please find attached your registration form.

We are concerned about this development. The Epol plant is going 12 m into the ground and have a silo area of 40 x 20 m with 32 x 500-ton silo, bearing down on the surface, the structure was not design with this in consideration.
We also extract water from under ground to substitute Municipal water.

Kind Regards
JJ.Prinsloo
Operation Manager

EPOL subscribes to Tip-Offs Anonymous. Help us to fight crime, fraud, theft, unethical behaviour or any other activity which is detrimental to our success by phoning 0800 003 224 or sending an e-mail to rclfoods@tip-offs.com

Disclaimer:
The use of the EPOL e-mail facility is not permitted for the distribution of chain letters or offensive e-mail of any nature whatsoever. EPOL hereby distances itself from and accepts no liability in respect of the unauthorised use of its e-mail facility or the sending of e-mail communications for other than strictly business purposes. EPOL furthermore disclaims liability for any unauthorised instruction for which permission is not granted.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:

Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)

Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140

Email: kirthi@avde.co.za

Tel: 012 940 9457

Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title		**First name**	JOACHIM
Initials	J.J.	**Surname**	PRINSLOO
Organisation	EPOL RUSTENBURG		
Postal address			
		Postal code	
Landline			
Fax			

COMMENTS (use a separate sheet if you wish to)

WE ARE CONCERNED ABOUT THE SHALLOW MINING AT GOMPHE PLANT IS GOING 12 M INTO THE SURFACE. WE HAVE A AREA OF 40 X 20 M OF SILO STORAGE WITH CAPACITY OF 16000 TON THAT IS GOING TO BEAR DOWN ON THE MINE AREA BELOW US.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 16 September 2024 15:37
To: 'Florence Mokhooa'
Cc: 'Reata Colyn'
Subject: RE: Request for Further Information (I&AP)
Attachments: Kwezi MRE -Final.pdf

Dear Florence

Thank you very much for your email. You have been registered as an Interested and Affected Party and your details has been included on the Stakeholder Database.

Attached is the Background Information Document for the proposed project.

Kindly compile the register and send through to Alta van Dyk Environmental Consultants. We will then capture the details of the community members on the Stakeholder Database as registered Interested and Affected parties. This will allow them to be informed on any developments on the proposed project. Please include the following on the register:

1. Name and Surname
2. Address
3. Email Address
4. Cell phone number

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Florence Mokhooa
Sent: Saturday, 07 September 2024 20:57
To: kirthi@avde.co.za
Subject: Re: Request for Further Information (I&AP)

Good Morning

My name is Florence Mokhooa, I am residing at the informal settlement next to Kwezi Shaft near Nkandla.

Could you please send me the further information regarding the proposed project about the attached document.

On behalf of the community, I am asking if we can create a register (to be signed by community members) as I&AP or every member of the community can contact you.?

Kindly share information in ENGLISH PLEASE.

Kind Regards

FM Mokhooa

On Sat, 7 Sept 2024, 20:05 Florence Mokhooa, wrote:

> Good Morning
>
> My name is Florence Mokhooa, I am residing at the informal settlement next to Kwezi Shaft near Nkandla.
>
> Could you please send me the further information regarding the proposed project about the attached document.
>
> Kindly share information in ENGLISH PLEASE.
>
> Kind Regards
>
> FM Mokhooa

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:
Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	Mr	**First name**	Herman
Initials	H	**Surname**	Brand
Organisation	Rustenburg Industrial Park		
Postal address		**Postal code**	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

1) We are in the prosess of drilling for water.
2) Our insurance will not cover us if this is approved
3) Our water will not be useble if project is approved
4) Our 8 tendants will move from the premises
5) Premises will not be safe with drilling underground at 40 m

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

The complete Industrial area will be effected

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	Mr	**First name**	Aubrey
Initials	AG	**Surname**	Kent
Organisation	Longken (Pty) Ltd T/A Intermine Agencies		
Postal address			
		Postal code	0300
Landline	014 596 5225	**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

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In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MR.	**First name**	Coenraad.
Initials	CJ	**Surname**	Botha.
Organisation	Private. owner.		
Postal address			
		Postal code	
Landline	—	**Cell**	
Fax	—	**Email**	

COMMENTS (use a separate sheet if you wish to)

I am the owner of the above, and Concern about the Blasting and Mining in our area for Damage to studures and Borehole Due to Ground Move Ment.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

NW Recycling Services Pty (Ltd)

How will the planned mining activities affect the following:

NW Recycling services premises seem to be right above where blocks A and B join.

1. The boreholes on site.
2. The buildings of which are the administration offices are a double storey.
3. The brick wall perimeter.
4. The inside surface premises of the operations consists of normal paving bricks and approximate 300mm reinforced concrete slab.
5. How this operations affect the future financial value of the property.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:
Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	CEO	**First name**	PETRUS
Initials	P.A.J.	**Surname**	MINNAAR
Organisation	NW RECYCLING SERVICES		
Postal address		**Postal code**	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

ATTACHED TO EMAIL
Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 16 September 2024 15:43
To:
Cc: 'Reata Colyn'
Subject: RE: Kwezi shaft Notice for expansion
Attachments: Kwezi MRE -Final.pdf

Dear Olebogeng Tlapu

Thank you very much for your email. You have been registered as an Interested and Affected Party and your details has been included on the Stakeholder Database.

Attached is the Background Information Document for the proposed project.

Thank you for your participation.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: olebogeng tlapu
Sent: Saturday, 07 September 2024 20:50
To: kirthi@avde.co.za
Subject: Kwezi shaft Notice for expansion

Good Afternoon

My name is Olebogeng Tlapu one of the community members living close or per say on the farm that the mine is proposing to do some extension as a concern citizen I would like to have more information about this project.

I hereby request a copy of the background information.Hoping my humble request will be considered

Best Regards
Olebogeng

2 Edam Avenue Waterval East Ext 37 Rustenburg 0299
Posbus / PO Box 254, Rustenburg, 0300

www.dupwest.co.za | Tel: (014) 523 4600 | Fax: (014) 592 9539

E-mail: melissa@dupwest.co.za | DOCEX: 9 RUSTENBURG

DupWest Inc.
DU PLESSIS & VAN DER WESTHUIZEN
ATTORNEYS | PROKUREURS

Prokureurs, Boedelberedderaars, Taksateurs & Aktevervaardigers
Attorneys, Administrators of Estates, Appraisers & Conveyancers

U Verwysing/Your Reference:
Kirthi Peramaul
Ons Verwysing/Our Reference:
N ESTERHUYSE/mva/

Datum/Date:
14 August 2024

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD
LYTTELTON

BY EMAIL: kirthi@avde.co.za

Dear Sir/Madam

OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK, RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

OUR CLIENT: LAURIE CILLIERS TRUST AND A D CILLIERS FAMILY TRUST

We refer to the above matter and confirm that we act on behalf of the Trustees of the Laurie Cilliers Trust (IT: 1327/1984) and the A D Cilliers Family Trust (IT: 861/2002).

Our clients are respectively the registered owners of the following properties:

a) Section number 1 in the Glenlore Scheme situated at Portion 37 of Erf 2447, Rustenburg Extension 9 Township;

b) Section number 3 in the Glenlore Scheme situated at Portion 37 of Erf 2447, Rustenburg Extension 9 Township.

Direkteure / Directors: P.P. Van Der Westhuizen (LI.B); N.J. Esterhuyse (B. Proc. LL. B); Keabetswe Teo (LL.B. LL.M) C.B.Clemente (LL.B Cert. in Deceased Estates Practice); Sue-Mari Swanepoel (LL.B)

Prokureur / Attorney: Frederik Hendrik Terblanche B.Jur. (LL.B); Megan de Kock (LL.B);Robert Dobie (LL.B);Thys Strydom (LL.B); Mariechen Schlotfeldt (B.Com,LL.B); V Moodley (BA LL.B); Yolandé Fourie (LL.B,BA Law) Shawn Van Niekerk (B. Com, LL. B)

Du Plessis & Van Der Westhuizen Inc.
REG. NO. 2001/002076/21

The Phatshoane Henney Group is an association of independent firms, not practicing in partnership and with separate liability.

member of phatshoanehenney ASSOCIATED LAW FIRMS

It should be noted that our clients' properties are situated at the identified Block B area situated directly above the target UG2 mineral deposit.

Our instructions are to object on behalf of our clients to the approval of the application for the proposed amendment of the mining right as detailed in your letter dated 30 September 2024, read with the draft BAR.

The properties of our clients are developed and utilised for commercial purposes in that buildings situated at the properties are leased out for use as a warehouse and shops. The shops are used by members of the public on a daily basis.

It is reasonably apprehended that the intended underground mining activities, with *inter alia* associated blasting, drilling and the depositing of dust, could cause damage to our clients' property and be a risk to the safety of our clients' representatives and members of the public.

The proposed extended mining operations may cause many adverse impacts on the environment due to the extractive nature of the operations. Water Quality is affected by:

- Sulfide minerals present in excavated rocks which are present in large quantities interact with oxygen and water to form acids. Due to these acids in water the pH of water is reduced and as it flows it dissolves more and more metals in it resulting in a very toxic and low pH water.

- Naturally occurring heavy metals often get released in to the mineral extraction process. Metals like Co, As, Cd, Hg, Cu, Pb, Zn etc. are contained in the rock may leach out and get carried downstream by water.

- Chemical agents like CN and H2SO4 from the mining site get spilled, leached or leaked in to nearby water bodies, including underground water.

It is common cause that the Rustenburg Local Municipality has experienced severe shortages in water supply. The proposed extended mining will increase the demand for water supply in the Rustenburg area to the detriment of the residents.

Yours faithfully

Du Plessis Van Der Westhuizen Incorporated

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MR	**First name**	VUYISILE
Initials	V	**Surname**	KONA
Organisation	VK CHROME PROCESSING (PTY) LTD		
Postal address		**Postal code**	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

We are in the process of applying for our own water rights

The intended mining activities will affect our water use We need the water to produce.

We have tall structures. The blasting processes to be undertaken will not affect the integrity of our structure?

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Kirthi Peramaul

From: Wouter
Sent: Thursday, 24 October 2024 08:22
To: 'Kirthi Peramaul'
Cc:
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Follow Up Flag: Follow up
Flag Status: Flagged

Good day Kirthi,

BOREHOLE AND WATER USAGE:
RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION
intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR)

Thank you for confirming our registration as an affected party. Your reply on the 10th of October 2024 below has reference.

We would like to register the fact that our property has a 55m deep borehole, drilled in 2022 at a very high cost. The reason for the borehole is because of the Rustenburg Local Municipality's inability to deliver water to any of the businesses in the mentioned Extension 9 area. We have just been notified that some of the business in our adjacent area have been visited by your staff to assess their boreholes. We have not had any such visits. If this needs to be registered as part of being an affected party, then please consider it registered under our name with immediate effect.

Our property hosts 12 tenants in the building, of which one is a bulk butchery. This tenant must, according to health and safety laws, flush all equipment and floors daily for hygienic purposes. Other tenants make use of water to test water pumps for the mines and require bulk water on a daily basis.

Should your proposed 40m deep excavations and planned bulk usage of the water reserves in our area affect our borehole, we will be forced to take immediate action should our borehole water be affected in any way – in quality and or quantity. The water is of critical importance to our tenants, their staff, business activities and general daily hygiene.

We trust you find the above in order.

Regards



Property development and rentals since 1982

This email is sent without prejudice to the rights of the landlord/owner/directors/employees.

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 10 October 2024 14:39
To: 'Wouter'
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Dear Wouter,

Thank you, your email dated 10 October 2024 has been received by Alta van Dyk Environmtnal.

Your have been registered as an interested and affected party and your details included on the project database.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Wouter <wouterw@mweb.co.za>
Sent: Thursday, 10 October 2024 11:52
To: 'Kirthi Peramaul' <kirthi@avde.co.za>; wouterw@mweb.co.za

Cc: 'Wouter van der Westhuizen'
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Good day Kirthi,

REQUEST FOR CONFIRMATION AS AN AFFECTED PARTY

We have sent the attached completed form to your offices on the 16th of September 2024. We have not yet received any confirmation that we have been registered as an affected party. Can you please confirm in writing.

In the interim, please see below your correspondence to us as a confirmation that you have us on file.

Can you please confirm that you have received the attached form and the details on it.

Warm regards

WOUTER VAN DER WESTHUIZEN
DIRECTOR
RUSCON INVESTMENTS
PROPERTY DEVELOPMENT & RENTALS

Property development and rentals since 1982

This email is sent without prejudice to the rights of the landlord/owner/directors/employees.

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 30 September 2024 16:07
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Dear Stakeholder,

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B).

Kindly find attached an updated Background Information Document and a Notification Letter which provides details of the area to be included in the Mining Right as well as the proposed mining blocks (Block A & B).

Kindly contact the undersigned should you require any further information on the proposed project.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MR.	**First name**	Solomon
Initials	S	**Surname**	Ramalamula
Organisation			
Postal address			
		Postal code	
Landline	–	**Cell**	
Fax	–	**Email**	

COMMENTS (use a separate sheet if you wish to)

Please register us as an affected party.

OWNERS: ERF 2447 PORTION 60
10A MANGHAN STREET
RUSTENBURG 0299

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:
Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MR.	**First name**	GERHARDUS
Initials	G P	**Surname**	MARE
Organisation			
Postal address			
			Postal code
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

MY BUSINESS IS DEPENDED ON THE SUPPLY OF WATER THROUGH THE BOREHOLE AND MY CONCERN IS THAT MINING ACTIVITIES WILL DESTROY THE BOREHOLES RLM WATER IS UNRELIABLE, WE HAD NO SUPPLY FOR 6 MONTHS.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	DR.	**First name**	DIRK
Initials	D.C.	**Surname**	ODENDAAL
Organisation			
Postal address			
		Postal code	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

PLEASE INVOLVE US, WE ARE DEPENDENT ON WATER FOR OUR FACTORY. WE DO NOT MAKE MUNICIPAL WATER AND IS DEPENDENT ON A BORE HOLE !! YOUR PROPOSED ACTIVITIES MAY RESULT IN US ENDING UP WITH NO BORE-HOLE WATER WHICH WILL BE DETREMENTAL TO OUR BUSINESS

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Kirthi Peramaul

From: Arthur Cockcroft
Sent: Wednesday, 11 September 2024 16:05
To: kirthi@avde.co.za
Subject: OMGEWING INPAK STUDIE: Town and townlands of Rustenburg
Attachments: IMG_20240911_0001.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Verw. NW30/5/1/2/2/80MR

Goeie dag Alta

U skrywe rondom vlak myn onder ons perseel erf 2258 RUSTENBURG UITB. 9 wens ek beswaar daarteen aan
te teken.

Ons het ‘n boorgat waaruit water ontgin word vir bottelering.

Watter waarborge het ons dat ons geboue nie gaan kraak of oor die lang termyn dalk kan insink nie?

Myn onder ons perseel gaan ons water bron besoedel of heeltmal vernietig.

Skade voorkoming aan geboue moet gewaarborg word op so wyse dat dit 100% skade of uitkoop sal dek.

U aandag aan hierdie beswaar sal hoog opprys gestel word.

Vriendelike groete

Arthur Cockcroft
WATERFLEX (Pty)Ltd

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MNR	**First name**	ARTHUR
Initials	A	**Surname**	COCKCROFT
Organisation			
Postal address			
		Postal code	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

VIAK MYN GAAN ONS WATERBRON (BOORGAT) AFSNY.
VIAK MYN KAN GEBOUK BESKADIG OOR KORT EN LANG
TERMYN SAL WAARBORGE IN VORM VAN TRUST GELDVER
WORD - DIE WAARBORG TERMYN MOET OOR 50 TOT 100
JAAR TERMYN STREK. WAARBORG MOET SODANIG WEES DAT
INDIEN MAATSKAPPY INSOLVENT GAAN OF VERVREEM WORD DAT
GENOEGSAME FONDSE VIR SKADE BESKIKBAAR SAL WEES.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Title	MNR	**First name**	ARTHUR
Initials	A	**Surname**	COCKCROFT
Organisation			
Postal address			
		Postal code	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

VIAK MYN GAAN ONS WATERBRON (BOORGAT) AFSNY.
VIAK MYN KAN GEBOUK BESKADIG OOR KORT EN LANG
TERMYN SAL WAARBORGE IN VORM VAN TRUST GELDVER
WORD - DIE WAARBORG TERMYN MOET OOR SOTOT 100
JAAR TERMYN STREK. WAARBORG MOET SODANIG WEES DAT
INDIEN MAATSKAPPY INSOLVENT GAAN OF VERVREEM WORD DAT
GENOEGSAME FONDSE VIR SKADE BESKIKBAAR SAL WEES.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

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Title	MR.	**First name**	ARTHUR
Initials	A.	**Surname**	COCKCROFT
Organisation			
Postal address		**Postal code**	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if yc

As per e.mail

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Kirthi Peramaul

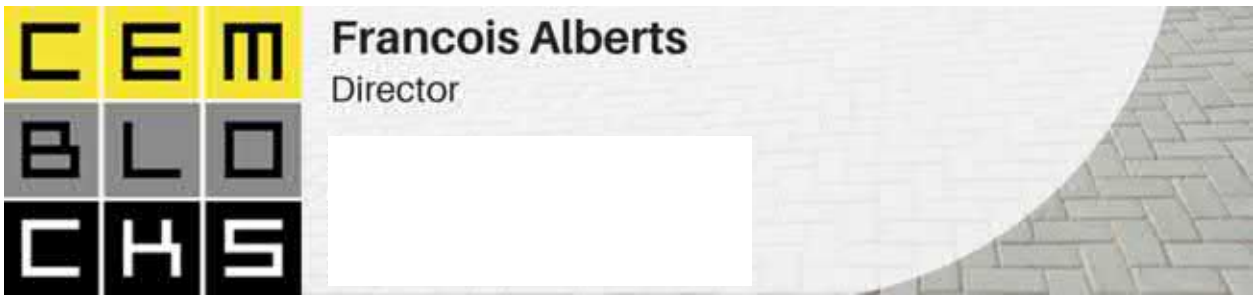
From: Francois Alberts | Cemblocks <
Sent: Monday, 30 September 2024 16:27
To: 'Kirthi Peramaul'
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Follow Up Flag: Follow up
Flag Status: Flagged

Hallo

Please send the full detail of the scope and register me as an interested and affected party is there already sates set up for a meeting ?

Regard



From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: 30 September 2024 16:07
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Dear Stakeholder,

RE: NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Kindly find attached an updated Background Information Document and a Notification Letter which provides details of the area to be included in the Mining Right as well as the proposed mining blocks (Block A & B).

Kindly contact the undersigned should you require any further information on the proposed project.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidaine • Environmental • Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

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Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MRS	**First name**	ANSIA
Initials	A.E	**Surname**	EULER
Organisation			
Postal address		**Postal code**	
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

INDUSTRIAL AREA EXT 9 SELDOM HAS WATER. MUNICIPAL WATER IS VERY UNRELIABLE, WE RELY ON OUR BOREHOLE FOR WATER SUPPLY AND WE ASSIST OUR NEIGHBOURS WITH WATER. WE CAN'T AFFORD TO LOOSE OUR WATER SUPPLY (BOREHOLE) DUE TO MINING ACTIVITIES.

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

REGISTRATION AND COMMENT SHEET

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS

RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Kindly complete this form and return to:
Kirthi Peramaul at Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE)
Postnet Suite # 745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za
Tel: 012 940 9457
Fax: 086 634 3967

YOUR CONTACT DETAILS

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Title	MR	**First name**	NAAS
Initials	IM	**Surname**	VAN ROOYEN
Organisation			
Postal address			
Landline		**Cell**	
Fax		**Email**	

COMMENTS (use a separate sheet if you wish to)

Portion 0 of stand 2257 – THE OWNERS OF THIS STAND OBJECT AGAINST MINING OPERATIONS BENEATH THIS STAND FOR THE FOLLOWING REASON:

- SENSITIVE ELECTRONIC EQUIPMENT MANAGING PRECISION CALIBRATED CUTTING MACHINES WILL BE AFFECTED BY BLASTING TREMORS
- CURRENT WATER SUPPLY THROUGH A BOREHOLE WILL BE AFFECTED

Are there any additional stakeholders who you should feel should be consulted with regards to the proposed project? Please provide their details.

Comments Received During the Draft Basic Assessment Report

LE ROUX ECKAARD
ATTORNEYS

LE ROUX, ECKAARD ATTORNEYS

To: Sibanye Rustenburg Platinum Mines (Pty) Ltd
Hex River Complex,
Old Mine Road,
Rustenburg
0299

Email: Karabo.Masilo@sibanyestillwater.com

For Attention: Karabo Masilo

Our Ref: JE le Roux **Your Ref:** Karabo Masilo **Date:** 26 November 2024

Dear Sir/Madam,

RE: EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS

We act on behalf of Euro Sales Manufacture (Pty) Ltd, the owner of the factory for structural steel products, fabrication and light engineering, situated at 7 Chroom Crescent, Industrial Area, Rustenburg. We are writing regarding your notice of intent to extend your mining operations to an area that includes our client's property by amending Mining Right 80 MR for the expansion of the Kwezi Mining Right Operations through the inclusion of the UG Shallow Blocks (Blocks A and B). Please advise why the whole of the industrial area is included in the application if the intention is only to mine Blocks A and B.

Our client has significant concerns about the potential impact of your proposed mining activities, particularly the operation at a depth of 40 meters below ground, which raises serious risks to their operations, infrastructure, and water supply.

In this regard, we refer to the following:

1. Concerns Regarding our client's borehole

Our client's factory relies solely on a single borehole as its water source, which is critical for ongoing operations. The proposed mining activities at this depth may:

- disrupt the aquifer supplying the borehole; and/or
- cause structural damage to the borehole and its equipment, compromising its functionality.

Without this water supply, our client's operations will be severely impacted, potentially leading to significant financial losses. The municipal water supply is totally unreliable and almost non-existent. Our client has a municipal water connection, but there is never any water. As a result, there are 25 boreholes in this industrial area. The municipal water pipes are old clay pipes that constantly break. Our client does not have any access to water except through their borehole.

We request detailed information about any hydrogeological assessments you have conducted and the measures you plan to implement to protect groundwater and boreholes (there are 25) in the vicinity of your proposed operations.

2. Concerns About Structural Integrity

The factory infrastructure is at risk of damage from:

- subsidence due to underground mining; and/or
- vibrations or other ground movement associated with mining activities.

We request a copy of any geotechnical studies that assess the potential impacts of your operations on neighbouring structures, including mitigation plans.

3. Impact on Insurance Coverage

Our client's current insurance policy excludes damages arising from earthquake arising from mining activities, leaving them financially exposed.

Our client has been approached with a request to permit a property evaluation and a housing crack survey on their property as part of the proposed underground mining expansion plan. We believe this request is primarily intended to protect the mine from potential future compensation claims, particularly in disputes over the extent of damage caused or, in cases of total loss, the market value of the property. This strongly indicates that the mine anticipates the likelihood of its operations, if extended, resulting in property damage or loss. Should our client's insurance coverage be adversely affected in any way, our client insists on equivalent replacement coverage, to be provided as an unconditional guarantee from your client, covering the full replacement value.

We therefore request confirmation that the mine will indemnify our client for any damages to the borehole, factory, or associated infrastructure caused by your mining activities.

4. Compliance with Environmental and Water Laws

• Please provide documentation demonstrating compliance with the following:

- Environmental Authorization: Has the Environmental Impact Assessment (EIA) for your mining operations addressed the risks to our client's property and borehole?
- Water Use License (WUL): Does your WUL account for potential impacts on aquifers and nearby boreholes?

5. Request for Mitigation and Compensation Plans

To address these concerns, we request that you:

- Conduct a detailed hydrogeological assessment of the borehole and aquifer to determine the potential impacts of your proposed operations.
- Commit to providing an alternative water supply, such as drilling a new borehole or connecting our client's factory to municipal water, should their current borehole be compromised.
- Develop and implement measures to prevent subsidence and structural damage to our client's factory.
- Enter into an agreement to compensate for any damages or operational disruptions caused by your mining activities.
- Establish a joint monitoring program to track groundwater levels and structural impacts throughout your operations.

6. Legal and Regulatory Obligations

Please be advised that our client reserves all rights to:

- Lodge objections during the public consultation process under the Mineral and Petroleum Resources Development Act (MPRDA) and National Environmental Management Act (NEMA).
- Notify the Department of Water and Sanitation (DWS) and Department of Mineral Resources and Energy (DMRE) of any risks arising from your operations.
- Pursue legal remedies, including an interdict to halt your operations, should imminent harm to their property or operations become apparent.

7. Request for Response

We kindly request your response to this letter (and the questions and concerns raised herein) within 10 business days, addressing the concerns raised and providing the requested information. Your cooperation in resolving these issues proactively will be greatly appreciated.

Our client is committed to working constructively with your company to ensure that their operations and property are safeguarded. However, they cannot accept undue risks to

their water supply, infrastructure, or business continuity. We urge you to engage in good faith discussions to address these issues comprehensively.

Should you require any clarification, please contact us at eckaard@summitlaw.co.za

Regards,



Eckaard le Roux

| Email: eckaard@summitlaw.co.za | Mobile: +27 (0)82 8888 499 | FFC 16556/2024 | | Practice No: F67610 | BEE Certification: Level 4 Contributor |

LE ROUX ECKAARD
ATTORNEYS

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To: Sibanye Rustenburg Platinum Mines (Pty) Ltd
Hex River Complex,
Old Mine Road,
Rustenburg
0299

Email: Jacques.Gouws@sibanyestillwater.com

For Attention: Jacques Gouws

Our Ref: JE le Roux **Your Ref:** Jacques Gouws **Date:** 5 December 2024

Dear Jacques,

RE: Follow-Up on Meeting Regarding Proposed Mining

We refer to our letter dated 26 November 2024, as well as the subsequent meeting held between representatives of Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) and our client, Euro Sales and Manufacture (Pty) Ltd, to discuss concerns regarding the proposed extension of your mining rights within 1 km of our client's factory.

Following this meeting, we wish to highlight our client's concerns as expressed at the meeting, draw your attention to your own experts' findings, and formally request commitments and further information as follows:

1. Reiteration of Our Client's Concerns

Our client remains deeply concerned about the potential impacts of the proposed mining activities, as identified by your experts, including:

- **Groundwater Depletion:** The risk of significant drawdown in groundwater levels, rendering borehole BH1 unusable during operations.

- **Water Quality Degradation:** Potential contamination of groundwater due to mining activities (such as backfilling etc.), detrimentally impacting on a water resource.

- **Groundwater Recovery Post-Mining**: Underground mining activities will take place within 100m from a watercourse and within 500m of a delineated wetland and could impede or divert the flow of water in a watercourse.

- **Structural and Equipment Damage:** Risks to infrastructure from subsidence or ground vibrations caused by blasting operations.

2. Request for Confirmation of Mitigation Measures

We request that SRPM provide a written undertaking detailing:

- Which of the recommended mitigation measures (as identified by your environmental experts) will be implemented in the future.

- Which measures have already been implemented to address the reported risks.

This includes, but is not limited to:

- Sealing of water-bearing features using chemical grouts.

- The establishment of alternative water supplies or well fields.

- Regular monitoring of groundwater levels and quality.

- Specific blasting vibration limits and safety protocols.

3. Guarantee for Compensation

In the event that the recommended mitigation measures prove unsuccessful, we request an unconditional guarantee that SRPM will compensate our client for any damage or loss suffered as a result of the mining operations.

4. Undertaking Regarding Groundwater Recovery Post-Mining

Once mining operations in Blocks A and B cease, we request an unconditional written undertaking that SRPM will implement the necessary steps recommended by experts to allow the groundwater levels to recover. This includes, amongst others, sealing shafts and other measures to prevent mine water decant and ensure aquifer restoration.

5. Request for Monitoring and Management Plan

We request that you provide us, within 10 days, with:

- a copy of the Monitoring and Management Plan referred to by your environmental consultants in their minutes dated 6 November 2024. This plan is critical to ensuring that all risks are proactively managed and mitigated;

- a transcription of the meeting that was recorded

6. Insurance Cover: We explained our client's predicament in our letter of 26 November 2024. We need a proposal from you as to how you envisage dealing with the problem.

We trust that you will treat these requests with the urgency they deserve, given the potential impacts on our client's operations and the surrounding environment.

Please do not hesitate to contact us should you wish to discuss these matters further.

We await your response within 5 days of the date of this letter as your environmental consultants set the deadline for raising objections at 13 December 2024.

Yours faithfully,



Eckaard le Roux

Kirthi Peramaul

From: Eckaard le Roux
Sent: Tuesday, 10 December 2024 12:27
To: Jacques Gouws
Cc: Stephan Botes; Kahmani Gounden; Xolile Rubushe; Phillip Ramphisa; Cor Dednam; Bez Bezuidenhout; Bonginkosi Ngqulunga; Cornell Strydom; Lesego Mokgethi; Karabo Masilo; Jenalee Govender; Bez Bezuidenhout; Peter McElligott; Yolande Janse van Rensburg; Kirthi Peramaul
Subject: RE: Sibanye Stillwater Kwezi Shallows Project: Letter to Le Roux, Eckaard Attorneys (10 Dec 2024)

Hi Jacques,

Thanks. We will consider and revert.

December 12th is the day before my client closes the factory for the December holidays. She needs to finalise everything for the closing, including the payment of salaries, bonuses, and holiday allowances.

She will only be available between 09:00 and 10:00 on December 12th. I am also available.

Regards,

Eckaard

LE ROUX ECKAARD
ATTORNEYS

IMPORTANT NOTICE: Cyber related crimes are widespread, specifically Business E-Mail Compromises ("BEC"), where your (or our) e-mail account is hacked or compromised. Imposters can intercept e-mails and alter banking details and/or other details at will. One of the best steps one can take to prevent an account or email compromise is to confirm that the purported sender of the email actually sent the communication. This can be done by phoning to confirm the email request. It is very important that you have actual confirmation before you change the account where money is being wired or before an electronic funds transfer is made. Use an alternative form of communication – the phone, or some other means – that is designed to reach the authentic person. It's always dangerous to seek confirmation by email, because one may inadvertently be communicating directly with the criminal.

We take all reasonable precautions to avoid BEC or similar cyber-related crimes, but unfortunately, the hacking or compromise of your e-mail account is beyond our control.

We urge you to call us to verify our bank or trust account details prior to making any payment to us.

Note that (i) our firm's bank account details will not change, and (ii) correspondence from our firm will never come from an e-mail address other than one ending in ***"@summitlaw.co.za".***

Please report any suspicious communications relating to a change in our business or trust bank account details.

From: Jacques Gouws <
Sent: Dinsdag 10 Desember 2024 10:42
To: Eckaard le Roux <eckaard@summitlaw.co.za>

Subject: RE: Sibanye Stillwater Kwezi Shallows Project: Letter to Le Roux, Eckaard Attorneys (10 Dec 2024)

Good day Eckaard,

I hope that you are well.

Please find attached a letter in response to your correspondence.

Please let me know if you have any questions.

Regards,

Jacques Gouws
Project Management and Controls
SA region | PGM operations or Gold operations
Tel: +27 12 660 0010 • Mobile: +27 82 413 9071
www.sibanyestillwater.com



From: Eckaard le Roux <[redacted]>
Sent: Thursday, 05 December 2024 05:46

Lesego
›; Jenalee
ter.com>;

Subject: Follow-Up on Meeting Regarding Proposed Mining

Please see the attached letter.



CONFIDENTIAL CAUTION NOTICE
This e-mail, its contents and any attachments are, unless the context obviously indicates otherwise, the property of Sibanye Stillwater Limited and/or its subsidiaries ("Sibanye-Stillwater"). It is legally privileged and confidential and may contain proprietary and/or personal information. It is intended solely for the use of the intended recipient. Access to this e-mail by any person or entity other than the intended recipient is prohibited. If you are not the intended recipient, any processing of the e-mail or the information contained therein (including disclosure, dissemination, copying, distribution, storage) or any action taken or omitted in reliance upon this information, is prohibited and may be unlawful. If you have received this message in error, please notify the sender by return e-mail, as well as privacyZA@sibanyestillwater.com for Southern Africa Region e-mails, or privacyEU@sibanyestillwater.com for European Region e-mails and delete this message.

LE ROUX ECKAARD
ATTORNEYS

To: Alta van Dyk Environmental Consultants (Pty) Ltd
Postnet Suite #745
Private Bag X1007
Lyttleton
0140

Email: kirthi@avde.co.za

For Attention: Kirthi Peramaul

Our Ref: JE le Roux **Your Ref:** Kirthi Peramaul **Date:** 13 December 2024

Dear Me. Peramaul,

Re: OBJECTION TO THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTHWEST PROVINCE [DMRE REFERENCE: NW30/5/1/2/2/80MR]

We act on behalf of Euro Sales Manufacture (Pty) Ltd, the owner of the factory for structural steel products, fabrication and light engineering, situated at 7 Chroom Crescent, Industrial Area, Rustenburg (approximately 1 km from the proposed mining expansion area). In terms of the applicable legislation we, on behalf of our client, wish to formally submit an objection to the applications of Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for:

- the proposed amendment or variation of mining right NW30/5/1/2/2/80MR, as detailed in the Draft Basic Assessment Report (DBAR) whereby the existing Approved Mining Right Area will be expanded; and
- the application for a water use licence in terms of the applicable legislation which application is necessitated by the fact that waste rock will not be brought to surface and will be packed underground, i.e. backfilling of the proposed UG2 Shallows Mining blocks A and B will take place.

Our client acknowledges the public participation process initiated by the environmental assessment, but they have significant concerns regarding the environmental, operational, and legal implications of the proposed (expanded) mining activities.

Basis of the Objection

1. National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)

- Section **2(4)(a)** of NEMA requires that environmental management prioritises sustainable development and ensures that adverse environmental impacts are minimised.

- The DBAR fails to adequately address the potential long and short-term environmental impacts on groundwater resources in the area generally and specifically in respect of our client's aforesaid borehole which is currently their only source of water for their manufacturing operations, including drawdown and contamination risks to our client's factory borehole (BH1).

- Section **24** of NEMA mandates that all activities affecting the environment must follow an integrated environmental management approach, which appears lacking in the current assessment, particularly with respect to any undertaking by SRPM to implement the mitigation measures for groundwater impacts as recommended by their technical experts.

2. National Water Act (NWA), 1998 (Act 36 of 1998)

- Section **27(1)(b)** of the NWA requires that the needs of current and future water users be considered in water use license applications (WULA). The proposed expansion fails to adequately ensure that sufficient groundwater resources will remain available for industrial use by our client.

- Section **19** imposes a duty on the mine to prevent pollution of water resources, but the mitigation strategies for potential contamination risks remain vague in the DBAR.

3. Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002)

- Section **2(h)** of the MPRDA requires mining operations to promote equitable access to mineral resources while minimising adverse impacts on the environment and communities. The proximity of the proposed mining area to our client's factory places them at an increased risk of environmental and operational harm.

4. Other Legislation

- There is also other legislation that applies [see DBAR p34-35]. Id any rights are granted, they should be made subject to compliance with such legislation (to be confirmed under oath by the CEO of SRPM) before construction is allowed to commence.

Client's General Concerns

The application for expansion of the existing mineral rights includes an area (the block southeast of the proposed mining Blocks A and B) where no mining is proposed for the said area. The environmental sensitivity of this area ranges from Very High to High and Medium in respect of themes like Aquatic biodiversity, Archaeological and cultural heritage and Terrestrial biodiversity (Very High); Agriculture and Civil Aviation (High) and Animal species and Paleontology (Medium) **[see Table 7 on p12 of the Draft Basic Assessment Report (DBAR)].** Because of this degree of sensitivity and the fact that no mining is proposed for that area, no expansion to that area should be allowed. In fact, no case has been made out to justify any expansion beyond Blocks A and B.I f the Minister is inclined to grant the expansion of the mineral rights, we suggest that a a further desktop study is necessary to assess the impacts and if necessary, also a field assessment.

Client's Specific Concerns

A number of potential medium to high impacts (relating to the impacts on groundwater, and ground vibration) have been identified that are associated with the operational and closure phases of the expanded mining activities.

- **Groundwater Impact**:
    - The proposed mining operations pose a significant risk of groundwater depletion and contamination, which could directly affect our client's borehole, BH1, a critical water source for their industrial processes.
    - Simulations predict a drop in the water level at BH1 by approximately 19.92 meters due to mining activities. If this happens, BH1 may completely dry up, making it unusable. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes were assessed (**Table 7.1of the Geohydrological Impact Assessment – Appendix C4 to the DBAR**). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole is highlighted in red. This assessment shows that over time many of the boreholes may dry up.
    - The Groundwater Level Recovery will take approximately 15 years to fully recover post closure, assuming no decant. Appendix C to the Geohydrological Impact Assessment shows a simulated Groundwater Level Recovery for BH1 of 51years.
    - The water table in the area is expected to drop as mining progresses, affecting BH1 and other nearby boreholes. [**Table 7.1 p. 52**]
    - The test results for Monitoring Borehole BH5 (the closest to BH1) shows likely contamination that would exceed the permitted levels in respect of certain elements (which is indicative of impacted water) [**Table 31, p 96].** The DBAR also recognises that the "*backfilled underground workings will at some point begin to decant as a result of an increase in recharge. The water may potentially be of poor quality and high in nitrate content and will therefore pose a contamination threat to the underlying groundwater."***[p. 105]**
    - It is further recognised that there is a medium to high risk that post closure management activities may result in contamination of water within the receiving environment, and subsequent reduction in water quality (increase in
    - salts and specific contaminants of concern and reduced pH) [**Table 35, p. 112**];
    - The proposed mining activities at the suggested depth may:
        - disrupt the aquifer supplying the borehole. It is also to be noted that the expanded underground mining activities will take place within 500m from a Channeled Valley

Bottom Wetland (CVBW)and within 100m from the closest watercourse. The operation of the underground mining area related to the undermining of the north-eastern CVBW is described as a medium to high potential of creating a cone of depression, which may drain water from the CVB wetland, thus resulting in desiccation of the wetland [**p. 107, Table 34**];

- cause structural damage to the borehole, compromising its functionality. The operation of the underground mining area related to the undermining of the north-eastern CVBW is described as a medium potential of destabilising the surrounding environment through the extraction of ore with a subsequent potential subsidence of the land [**p. 107, Table 34**];

- cause the borehole to dry up. In this regard the DBAR states on p103 as follows: "*The change in groundwater level at the end of an assumed 5-year mining period is shown in Figure 45. The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 60 m. The extent of the impact is within a radius of 1 km from the edge of the mining block. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes were assessed (Table 33). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole is highlighted in red. This assessment shows that over time many of the boreholes may dry up."* **BH1 is marked red in Table 33 on p 103.** The potential lowering of the groundwater level is regarded as the most significant risk associated with the project. It has the potential to impact on private groundwater users, who are solely reliant upon groundwater as their only source of water;

- the reactive rock may result in the potential formation of acid mine drainage; and

- possible leachate formation which could impact the water resources. Proper management and treatment of leachate are therefore crucial to prevent environmental pollution.

- Without this water supply, our client's operations will be severely impacted, potentially leading to significant financial losses.

- The DBAR does not sufficiently address the feasibility or reliability of alternative water sources.

- **Aquifer Impact: Weathered Aquifer.** [**p12 of the Geohydrological Impact Assessment**]: The finding is that The borehole's reliance on a shallow aquifer makes it susceptible to disruptions caused by mining, including reduced water availability and quality.

- **Potential for Mine Water Decant:** In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure. Sealing of the low-lying shafts may be considered as a mitigating measure not only to prevent decant, but also to allow the mine water level to rise and the affected boreholes to recover.

- **Water Quality:** Mining activities, particularly waste rock interactions, might degrade water quality, introducing contaminants or altering the hydrochemical balance.[**p 34 and p 57**] The most significant post-closure risk that may impact the groundwater regime is:
    - Reduction in the groundwater levels.[**Risk Medium -High Table 7.4 on p 58].** The potential lowering of the groundwater level is regarded as the most significant risk associated with this project. It has the potential to impact on private groundwater users, who are solely reliant upon groundwater as their only source of water.
- SRPM concedes that the effects of climate change were not considered. However, it is acknowledged that *" this might **exacerbate the anticipated reduction in water inputs** and the resultant hydrological function of the water course **beyond the extent of the proposed development**."* **[BBAR - p15].** We submit that this acknowledgment alone necessitates a specialist report to provide more detailed information on the extent of the anticipated reduction in water inputs and any design controls and mitigation measures that can be implemented to manage and/or reduce these impacts.

- **Structural and Operational Risks**:

  The vibrations and subsidence from mining activities could damage our client's factory infrastructure and equipment. No detailed vibration management plan has been provided.

- **Inadequate Mitigation Measures**:

    - The DBAR proposes general design controls and mitigation measures but lacks specific commitments, guarantees, undertakings, indemnities or implementation timelines that SRPM is prepared to give.

    - Also, our client's current insurance policy excludes damages arising from earthquake arising from mining activities, leaving them financially exposed in the event of loss/damage being suffered because of the expanded mining activities. No indemnity has been provided/offered to our client (on a replacement value basis) for any loss/damages to the borehole, factory, or associated infrastructure caused by the expanded mining activities of SRPM.

Requests for Clarification and Action

1. **Commitment to Mitigation Measures**:

   Our client requests that SRPM commits in writing to all mitigation measures outlined in the DBAR and provides an Environmental Management Programme (EMPr) spelling out what control and mitigation measures will be put in place together with suitable guarantees and indemnities to our client's satisfaction regarding the issues raised herein, and a detailed timeline for the implementation of suitable control and mitigation measures.

2. **Comprehensive Groundwater Management Plan**:

   Provide a detailed plan outlining how groundwater resources will be monitored and protected throughout the operational and post-mining phases.

3. **Guarantees for Compensation**:

   Our client seeks an unconditional guarantee that any damages or losses resulting from the mining operations, including groundwater depletion or structural damage, will be fully compensated.

4. **Unconditional Undertaking for Post-Mining Recovery**:

   Ensure that after mining ceases in Blocks A and B, all necessary steps will be taken to restore groundwater levels and minimize environmental impacts, as required under NEMA and NWA.

5. Monitoring and Reporting

- As a condition to any environmental authorisation granted, it must be stipulated that internal environmental compliance audits on the EMPr must be undertaken annually, and the resultant audit reports must be submitted to the DMPR and to our client. External environmental compliance audits on the EMPr must also be undertaken every two years by an independent EAP and a copy of the external audit report will must submitted to the DMPR and our client.
- Our client's borehole must be monitored by SRPM on a monthly basis for damage, water quality and borehole level and the report must be made available to our client.

6. Financial Provision

- Sect 24P of the National Environmental Management Act (NEMA), requires the submission of financial provision for rehabilitation, closure, and post-closure management of environmental impacts for mining activities. SRPM asks for an exemption and provided a motivation (**Appendix E**). Our client submits that the motivation is inadequate and that a further bank guarantee should be provided for an additional amount to the satisfaction of DMPR for the following reasons:
  - SRPM's motivation hat the expansion will utilise existing infrastructure and thus not significantly increase surface disturbance does not align with the spirit of the law. This law exists to ensure that mining companies adequately cover the costs of rehabilitating the environment after mining operations have ceased, regardless of the perceived insignificance of additional disturbances;
  - SRPM has not provided current data or assessments to substantiate that the existing financial guarantee of R214,704,579.72 remains adequate against the backdrop of the proposed expansion. Mining economics are volatile, and the costs associated with environmental rehabilitation can escalate due to unforeseen contamination or structural changes necessitated by expanded operations;
  - There is no indication that the existing financial provision has been updated or increased to reflect current or future potential costs directly related to the areas now proposed for inclusion under the mining right. This is critical as the expansion could uncover new environmental challenges that were not accounted for in the original financial provisioning;

- The original financial guarantee was presumably established in 2002. Given the inflationary pressures and changes in environmental rehabilitation technologies and requirements, it is unlikely that a guarantee set nearly two decades ago would suffice for future rehabilitation needs, particularly when the mining area and volume of operation are to be expanded;
- Even if the expansion utilises existing infrastructures, such as the Kwezi shaft, the increased extraction of resources is likely to pose additional risks to local ecosystems. This can include increased risk of water pollution, borehole and habitat destruction, and potentially irreversible biodiversity loss. Such impacts necessitate a re-evaluation of the financial provisions to ensure they are commensurate with the potential damage and the costs of mitigating such impacts;
- The closure objectives aim to integrate the post-mining landscape with regional land uses and promote biodiversity. Expanding mining operations without adjusting financial guarantees could jeopardize these objectives, especially if financial resources fall short in addressing more extensive rehabilitation needs;
- The impact on water quality and catchment yield must be reassessed in light of mining expansion. The current financial provision may not adequately address the potential for increased water use, contamination, and the need for more extensive water purification and management strategies post-closure;
- The motivation provided by SRPM for not enhancing the financial guarantee in light of their expansion underplays the potential for increased environmental impact and does not adequately safeguard against the financial risks of insufficient rehabilitation funding. It is crucial for DMPR to enforce a thorough reassessment of the financial guarantees in place, ensuring they are sufficient to cover the real costs of rehabilitating the mine to a state that supports sustainable post-mining land use and adheres to environmental protection standards. This reassessment should be guided by current environmental evaluation and future risk anticipation rather than historical financial provisions that may no longer be adequate.

We urge you and your client to carefully consider these objections and take appropriate actions to mitigate the significant risks posed by the proposed expansion. Should the mitigation measures prove inadequate or fail to address our client's concerns, our client reserves the right to pursue further legal action to protect its interests.

We look forward to receiving a written response addressing these concerns within **10 business days**.

Regards,



JE Le Roux

Kirthi Peramaul

From: Eckaard le Roux
Sent: Tuesday, 10 December 2024 12:27
To: Jacques Gouws
Cc: Stephan Botes; Kahmani Gounden; Xolile Rubushe; Phillip Ramphisa; Cor Dednam; Bez Bezuidenhout; Bonginkosi Ngqulunga; Cornell Strydom; Lesego Mokgethi; Karabo Masilo; Jenalee Govender; Bez Bezuidenhout; Peter McElligott; Yolande Janse van Rensburg; Kirthi Peramaul
Subject: RE: Sibanye Stillwater Kwezi Shallows Project: Letter to Le Roux, Eckaard Attorneys (10 Dec 2024)

Hi Jacques,

Thanks. We will consider and revert.

December 12th is the day before my client closes the factory for the December holidays. She needs to finalise everything for the closing, including the payment of salaries, bonuses, and holiday allowances.

She will only be available between 09:00 and 10:00 on December 12th. I am also available.

Regards,

Eckaard

LE ROUX ECKAARD
ATTORNEYS

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Please report any suspicious communications relating to a change in our business or trust bank account details.

From: Jacques Gouws
Sent: Dinsdag 10 Desember 2024 10:42

Subject: RE: Sibanye Stillwater Kwezi Shallows Project: Letter to Le Roux, Eckaard Attorneys (10 Dec 2024)

Good day Eckaard,

I hope that you are well.

Please find attached a letter in response to your correspondence.

Please let me know if you have any questions.

Regards,

Jacques Gouws
Project Management and Controls
SA region | PGM operations or Gold operations

www.sibanyestillwater.com



From: Eckaard le Roux
Sent: Thursday, 05 December 2024 05:46

Subject: Follow-Up on Meeting Regarding Proposed Mining

Please see the attached letter.

LE ROUX ECKAARD
ATTORNEYS

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LE ROUX ECKAARD
ATTORNEYS

To: Alta van Dyk Environmental Consultants (Pty) Ltd
Postnet Suite #745
Private Bag X1007
Lyttleton
0140

Email: kirthi@avde.co.za

For Attention: Kirthi Peramaul

Our Ref: JE le Roux **Your Ref:** Kirthi Peramaul **Date:** 13 December 2024

Dear Me. Peramaul,

Re: OBJECTION TO THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTHWEST PROVINCE [DMRE REFERENCE: NW30/5/1/2/2/80MR]

We act on behalf of Euro Sales Manufacture (Pty) Ltd, the owner of the factory for structural steel products, fabrication and light engineering, situated at 7 Chroom Crescent, Industrial Area, Rustenburg (approximately 1 km from the proposed mining expansion area). In terms of the applicable legislation we, on behalf of our client, wish to formally submit an objection to the applications of Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for:

- the proposed amendment or variation of mining right NW30/5/1/2/2/80MR, as detailed in the Draft Basic Assessment Report (DBAR) whereby the existing Approved Mining Right Area will be expanded; and
- the application for a water use licence in terms of the applicable legislation which application is necessitated by the fact that waste rock will not be brought to surface and will be packed underground, i.e. backfilling of the proposed UG2 Shallows Mining blocks A and B will take place.

Our client acknowledges the public participation process initiated by the environmental assessment, but they have significant concerns regarding the environmental, operational, and legal implications of the proposed (expanded) mining activities.

Basis of the Objection

1. National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)

- Section **2(4)(a)** of NEMA requires that environmental management prioritises sustainable development and ensures that adverse environmental impacts are minimised.

- The DBAR fails to adequately address the potential long and short-term environmental impacts on groundwater resources in the area generally and specifically in respect of our client's aforesaid borehole which is currently their only source of water for their manufacturing operations, including drawdown and contamination risks to our client's factory borehole (BH1).

- Section **24** of NEMA mandates that all activities affecting the environment must follow an integrated environmental management approach, which appears lacking in the current assessment, particularly with respect to any undertaking by SRPM to implement the mitigation measures for groundwater impacts as recommended by their technical experts.

2. National Water Act (NWA), 1998 (Act 36 of 1998)

- Section **27(1)(b)** of the NWA requires that the needs of current and future water users be considered in water use license applications (WULA). The proposed expansion fails to adequately ensure that sufficient groundwater resources will remain available for industrial use by our client.

- Section **19** imposes a duty on the mine to prevent pollution of water resources, but the mitigation strategies for potential contamination risks remain vague in the DBAR.

3. Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002)

- Section **2(h)** of the MPRDA requires mining operations to promote equitable access to mineral resources while minimising adverse impacts on the environment and communities. The proximity of the proposed mining area to our client's factory places them at an increased risk of environmental and operational harm.

4. Other Legislation

- There is also other legislation that applies [see DBAR p34-35]. Id any rights are granted, they should be made subject to compliance with such legislation (to be confirmed under oath by the CEO of SRPM) before construction is allowed to commence.

Client's General Concerns

The application for expansion of the existing mineral rights includes an area (the block southeast of the proposed mining Blocks A and B) where no mining is proposed for the said area. The environmental sensitivity of this area ranges from Very High to High and Medium in respect of themes like Aquatic biodiversity, Archaeological and cultural heritage and Terrestrial biodiversity (Very High); Agriculture and Civil Aviation (High) and Animal species and Paleontology (Medium) **[see Table 7 on p12 of the Draft Basic Assessment Report (DBAR)].** Because of this degree of sensitivity and the fact that no mining is proposed for that area, no expansion to that area should be allowed. In fact, no case has been made out to justify any expansion beyond Blocks A and B.I f the Minister is inclined to grant the expansion of the mineral rights, we suggest that a a further desktop study is necessary to assess the impacts and if necessary, also a field assessment.

LE ROUX ECKAARD
ATTORNEYS

Client's Specific Concerns

A number of potential medium to high impacts (relating to the impacts on groundwater, and ground vibration) have been identified that are associated with the operational and closure phases of the expanded mining activities.

- **Groundwater Impact**:
    - The proposed mining operations pose a significant risk of groundwater depletion and contamination, which could directly affect our client's borehole, BH1, a critical water source for their industrial processes.
    - Simulations predict a drop in the water level at BH1 by approximately 19.92 meters due to mining activities. If this happens, BH1 may completely dry up, making it unusable. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes were assessed (**Table 7.1of the Geohydrological Impact Assessment – Appendix C4 to the DBAR**). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole is highlighted in red. This assessment shows that over time many of the boreholes may dry up.
    - The Groundwater Level Recovery will take approximately 15 years to fully recover post closure, assuming no decant. Appendix C to the Geohydrological Impact Assessment shows a simulated Groundwater Level Recovery for BH1 of 51years.
    - The water table in the area is expected to drop as mining progresses, affecting BH1 and other nearby boreholes. [**Table 7.1 p. 52**]
    - The test results for Monitoring Borehole BH5 (the closest to BH1) shows likely contamination that would exceed the permitted levels in respect of certain elements (which is indicative of impacted water) [**Table 31, p 96].** The DBAR also recognises that the "*backfilled underground workings will at some point begin to decant as a result of an increase in recharge. The water may potentially be of poor quality and high in nitrate content and will therefore pose a contamination threat to the underlying groundwater."***[p. 105]**
    - It is further recognised that there is a medium to high risk that post closure management activities may result in contamination of water within the receiving environment, and subsequent reduction in water quality (increase in
    - salts and specific contaminants of concern and reduced pH) [**Table 35, p. 112**];
    - The proposed mining activities at the suggested depth may:
        - disrupt the aquifer supplying the borehole. It is also to be noted that the expanded underground mining activities will take place within 500m from a Channeled Valley

Bottom Wetland (CVBW)and within 100m from the closest watercourse. The operation of the underground mining area related to the undermining of the north-eastern CVBW is described as a medium to high potential of creating a cone of depression, which may drain water from the CVB wetland, thus resulting in desiccation of the wetland [**p. 107, Table 34**];

- cause structural damage to the borehole, compromising its functionality. The operation of the underground mining area related to the undermining of the north-eastern CVBW is described as a medium potential of destabilising the surrounding environment through the extraction of ore with a subsequent potential subsidence of the land [**p. 107, Table 34**];

- cause the borehole to dry up. In this regard the DBAR states on p103 as follows: "*The change in groundwater level at the end of an assumed 5-year mining period is shown in Figure 45. The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 60 m. The extent of the impact is within a radius of 1 km from the edge of the mining block. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes were assessed (Table 33). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole is highlighted in red. This assessment shows that over time many of the boreholes may dry up."* **BH1 is marked red in Table 33 on p 103.** The potential lowering of the groundwater level is regarded as the most significant risk associated with the project. It has the potential to impact on private groundwater users, who are solely reliant upon groundwater as their only source of water;

- the reactive rock may result in the potential formation of acid mine drainage; and

- possible leachate formation which could impact the water resources. Proper management and treatment of leachate are therefore crucial to prevent environmental pollution.

- Without this water supply, our client's operations will be severely impacted, potentially leading to significant financial losses.

- The DBAR does not sufficiently address the feasibility or reliability of alternative water sources.

- **Aquifer Impact: Weathered Aquifer.** [**p12 of the Geohydrological Impact Assessment**]: The finding is that The borehole's reliance on a shallow aquifer makes it susceptible to disruptions caused by mining, including reduced water availability and quality.

- **Potential for Mine Water Decant:** In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure. Sealing of the low-lying shafts may be considered as a mitigating measure not only to prevent decant, but also to allow the mine water level to rise and the affected boreholes to recover.

- **Water Quality:** Mining activities, particularly waste rock interactions, might degrade water quality, introducing contaminants or altering the hydrochemical balance.[**p 34 and p 57**] The most significant post-closure risk that may impact the groundwater regime is:
    - Reduction in the groundwater levels.[**Risk Medium -High Table 7.4 on p 58].** The potential lowering of the groundwater level is regarded as the most significant risk associated with this project. It has the potential to impact on private groundwater users, who are solely reliant upon groundwater as their only source of water.
- SRPM concedes that the effects of climate change were not considered. However, it is acknowledged that *" this might* ***exacerbate the anticipated reduction in water inputs*** *and the resultant hydrological function of the water course* ***beyond the extent of the proposed development****."* **[BBAR - p15].** We submit that this acknowledgment alone necessitates a specialist report to provide more detailed information on the extent of the anticipated reduction in water inputs and any design controls and mitigation measures that can be implemented to manage and/or reduce these impacts.

- **Structural and Operational Risks**:

  The vibrations and subsidence from mining activities could damage our client's factory infrastructure and equipment. No detailed vibration management plan has been provided.

- **Inadequate Mitigation Measures**:

    - The DBAR proposes general design controls and mitigation measures but lacks specific commitments, guarantees, undertakings, indemnities or implementation timelines that SRPM is prepared to give.

    - Also, our client's current insurance policy excludes damages arising from earthquake arising from mining activities, leaving them financially exposed in the event of loss/damage being suffered because of the expanded mining activities. No indemnity has been provided/offered to our client (on a replacement value basis) for any loss/damages to the borehole, factory, or associated infrastructure caused by the expanded mining activities of SRPM.

Requests for Clarification and Action

1. **Commitment to Mitigation Measures**:

   Our client requests that SRPM commits in writing to all mitigation measures outlined in the DBAR and provides an Environmental Management Programme (EMPr) spelling out what control and mitigation measures will be put in place together with suitable guarantees and indemnities to our client's satisfaction regarding the issues raised herein, and a detailed timeline for the implementation of suitable control and mitigation measures.

2. **Comprehensive Groundwater Management Plan**:

   Provide a detailed plan outlining how groundwater resources will be monitored and protected throughout the operational and post-mining phases.

3. **Guarantees for Compensation**:

   Our client seeks an unconditional guarantee that any damages or losses resulting from the mining operations, including groundwater depletion or structural damage, will be fully compensated.

4. **Unconditional Undertaking for Post-Mining Recovery**:

   Ensure that after mining ceases in Blocks A and B, all necessary steps will be taken to restore groundwater levels and minimize environmental impacts, as required under NEMA and NWA.

5. Monitoring and Reporting

- As a condition to any environmental authorisation granted, it must be stipulated that internal environmental compliance audits on the EMPr must be undertaken annually, and the resultant audit reports must be submitted to the DMPR and to our client. External environmental compliance audits on the EMPr must also be undertaken every two years by an independent EAP and a copy of the external audit report will must submitted to the DMPR and our client.
- Our client's borehole must be monitored by SRPM on a monthly basis for damage, water quality and borehole level and the report must be made available to our client.

6. Financial Provision

- Sect 24P of the National Environmental Management Act (NEMA), requires the submission of financial provision for rehabilitation, closure, and post-closure management of environmental impacts for mining activities. SRPM asks for an exemption and provided a motivation (**Appendix E**). Our client submits that the motivation is inadequate and that a further bank guarantee should be provided for an additional amount to the satisfaction of DMPR for the following reasons:
  - SRPM's motivation hat the expansion will utilise existing infrastructure and thus not significantly increase surface disturbance does not align with the spirit of the law. This law exists to ensure that mining companies adequately cover the costs of rehabilitating the environment after mining operations have ceased, regardless of the perceived insignificance of additional disturbances;
  - SRPM has not provided current data or assessments to substantiate that the existing financial guarantee of R214,704,579.72 remains adequate against the backdrop of the proposed expansion. Mining economics are volatile, and the costs associated with environmental rehabilitation can escalate due to unforeseen contamination or structural changes necessitated by expanded operations;
  - There is no indication that the existing financial provision has been updated or increased to reflect current or future potential costs directly related to the areas now proposed for inclusion under the mining right. This is critical as the expansion could uncover new environmental challenges that were not accounted for in the original financial provisioning;

- The original financial guarantee was presumably established in 2002. Given the inflationary pressures and changes in environmental rehabilitation technologies and requirements, it is unlikely that a guarantee set nearly two decades ago would suffice for future rehabilitation needs, particularly when the mining area and volume of operation are to be expanded;
- Even if the expansion utilises existing infrastructures, such as the Kwezi shaft, the increased extraction of resources is likely to pose additional risks to local ecosystems. This can include increased risk of water pollution, borehole and habitat destruction, and potentially irreversible biodiversity loss. Such impacts necessitate a re-evaluation of the financial provisions to ensure they are commensurate with the potential damage and the costs of mitigating such impacts;
- The closure objectives aim to integrate the post-mining landscape with regional land uses and promote biodiversity. Expanding mining operations without adjusting financial guarantees could jeopardize these objectives, especially if financial resources fall short in addressing more extensive rehabilitation needs;
- The impact on water quality and catchment yield must be reassessed in light of mining expansion. The current financial provision may not adequately address the potential for increased water use, contamination, and the need for more extensive water purification and management strategies post-closure;
- The motivation provided by SRPM for not enhancing the financial guarantee in light of their expansion underplays the potential for increased environmental impact and does not adequately safeguard against the financial risks of insufficient rehabilitation funding. It is crucial for DMPR to enforce a thorough reassessment of the financial guarantees in place, ensuring they are sufficient to cover the real costs of rehabilitating the mine to a state that supports sustainable post-mining land use and adheres to environmental protection standards. This reassessment should be guided by current environmental evaluation and future risk anticipation rather than historical financial provisions that may no longer be adequate.

We urge you and your client to carefully consider these objections and take appropriate actions to mitigate the significant risks posed by the proposed expansion. Should the mitigation measures prove inadequate or fail to address our client's concerns, our client reserves the right to pursue further legal action to protect its interests.

We look forward to receiving a written response addressing these concerns within **10 business days**.

Regards,

JE Le Roux

Kirthi Peramaul

From: Gugu Manyathi ·
Sent: Monday, 23 December 2024 11:12
To: Jacques Gouws; Kirthi Peramaul; Ettienne Thiebaut; Loren Laker; Pramarshen Perumal; Reata Colyn; Phillip Ramphisa
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM

Follow Up Flag: Follow up
Flag Status: Flagged

Good day Jacques,

Thank you for the below acknowledgement and take it that the requested extension I granted. As Rainbow we appreciate that there will be ongoing engagements between the parties and look forward to the additional results and any other pertinent information relevant to interested and affected parties.

Enjoy the holidays.

Regards,

RAINBOW®

Gugu Manyathi

From: Jacques Gouws
Sent: Friday, 20 December 2024 07:58

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM

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Dear Gugu,

I hope that you are well.

As Kirthi is on leave, I am taking the liberty to respond to your email below.

I would like to emphasise that in the broader context, the process of discussions and communications remains open throughout. We are committed to a continuous open, transparent, and fair process, not only because the legislative processes demands such, but also because we as a company want to remain true to our values.

To facilitate this, we intend to set up a communications forum where we will be providing frequent feedback on our studies and the associated management and monitoring plans, hear concerns from interested and affected parties like yourselves, and so forth. More detail will be provided during the month of January 2025.

A letter was also sent to Loren yesterday, which we hope addresses at least some of the concerns, at least in the interim.

Please therefore feel free to raise concerns as and when you see fit.

I hope this helps allay any fears you may have, but please let me know if you would like to discuss anything.

Thanks.

Kind Regards,

Jacques Gouws
Project Management and Controls
SA region | PGM operations or Gold operations

www.sibanyestillwater.com





From: Gugu Manyathi <
Sent: Thursday, 19 December 2024 15:37

ıicken.com>; Loren Laker
ıes Gouws

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM
Importance: High

Good day Kirthi,

Thank you for the call as well as the presentation. As you are aware Sibanye's application is of great concern to Rainbow for reasons outlined in correspondence prior to the call of 12 Dec 2024 and on the call. Therefore, to ensure that we make a well-informed decision we will need to consult with our relevant experts. We have reached out to the said experts, and they are all current on holiday returning in the second week of Jan 2025, 7th and 8th. Considering this Rainbow, as a recognised interest and affected party, requests a further extension to submit comments to the expansion of the mining rights area application to no later than 27 Jan 2025. This will afford us the opportunity to consult with external and internal stakeholders on the assessment report in support of the application, the presentation dated 12 Dec 2024 as well as review the updated ground water report (to be proved by Marius a Sibanye consultant as outlined on the call on 12 Dec 2024) to name just a few.

We look forward to your feedback herein.

Regards,

RAINBOW®

Gugu Manyathi

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 12 December 2024 14:56
To: Ettienne Thiebaut <Ettienne.Thiebaut@rainbowchicken.com>; Loren Laker <Loren.Laker@epol.co.za>; Gugu Manyathi <Gugu.Manyathi@rainbowchicken.com>; Pramarshen Perumal <Pramarshen.Perumal@epol.co.za>; 'Jacques Gouws' <Jacques.Gouws@sibanyestillwater.com>; 'Reata Colyn' <reata@avde.co.za>
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM

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Dear Loren,

Thank you for your time today. Kindly see attached the presentation. The meeting recording has been shared via we transfer. You can use the link below to download the recording.

https://we.tl/t-YDXKanIMZz

Please do contact me should you require any further info.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Ettienne Thiebaut ·
Sent: Thursday, 12 December 2024 08:43
To: Kirthi Peramaul <kirthi@avde.co.za>
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM

Hi Kirthi, sorry I cannot attend. Will you share minutes with me please?

-----Original Appointment-----
From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Tuesday, 10 December 2024 15:08

Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM
When: Thursday, 12 December 2024 11:00-12:00 (UTC+02:00) Harare, Pretoria.
Where: Microsoft Teams Meeting

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-----Original Appointment-----
From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Tuesday, 10 December 2024 06:16

Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM
When: Thursday, 12 December 2024 11:00-12:00 (UTC+02:00) Harare, Pretoria.
Where: Microsoft Teams Meeting

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HI Anina, if you have a gap you are more than welcome to join, if not I will keep you updated on the conclusion.

Regards

-----Original Appointment-----
From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 09 December 2024 15:43

Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area Epol FGM
When: Thursday, 12 December 2024 11:00-12:00 (UTC+02:00) Harare, Pretoria.
Where: Microsoft Teams Meeting

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 390 532 130 171

Passcode: st3zG7W6

For organizers: Meeting options

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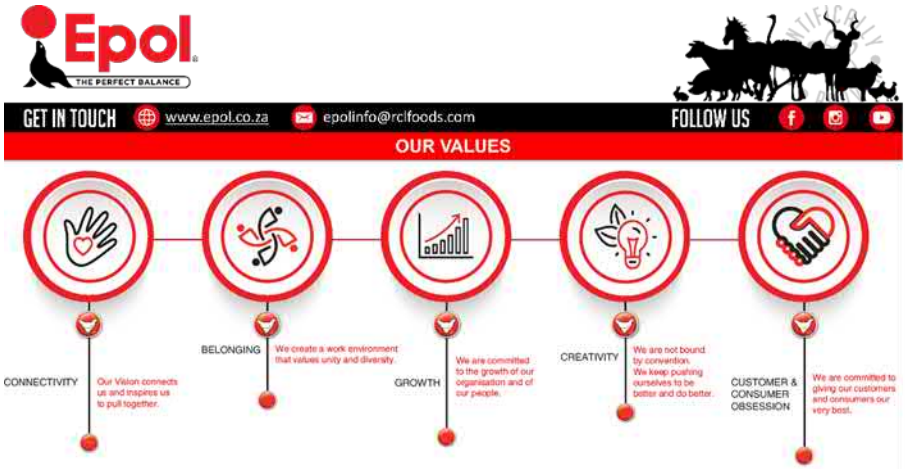
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Kirthi Peramaul

From: Loren Laker
Sent: Wednesday, 18 December 2024 09:15
To: Jacques Gouws; Kirthi Peramaul
Cc: Pramarshen Perumal; Joachim Prinsloo; Reata Colyn; Yolande Janse van Rensburg; Phillip Ramphisa; Anina Hunter; Gugu Manyathi
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Noted thank you Jacques.

Loren Laker
National Engineer



From: Jacques Gouws ·
Sent: Wednesday, 18 December 2024 09:02

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

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Hello Loren,

As different people are copied in this email, please find attached my email to your query preceding this one.

Please let me know if you have any questions.

Regards,

Jacques Gouws
Project Management and Controls
SA region | PGM operations or Gold operations

www.sibanyestillwater.com



From: Loren Laker <
Sent: Wednesday, 18 December 2024 08:56
To: Kirthi Peramaul <kirthi@avde.co.za>
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

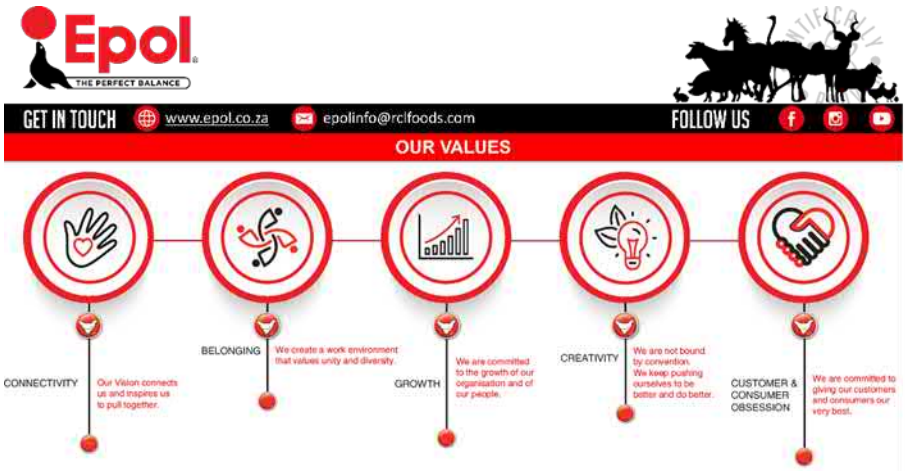
HI all,

Just a follow up on official document stating exclusion of any UG activities below the Epol site as discussed.

Looking forward for your reply.

Regards.

Loren Laker
National Engineer



From: Loren Laker
Sent: Thursday, 12 December 2024 14:40
To: Kirthi Peramaul <kirthi@avde.co.za>

a

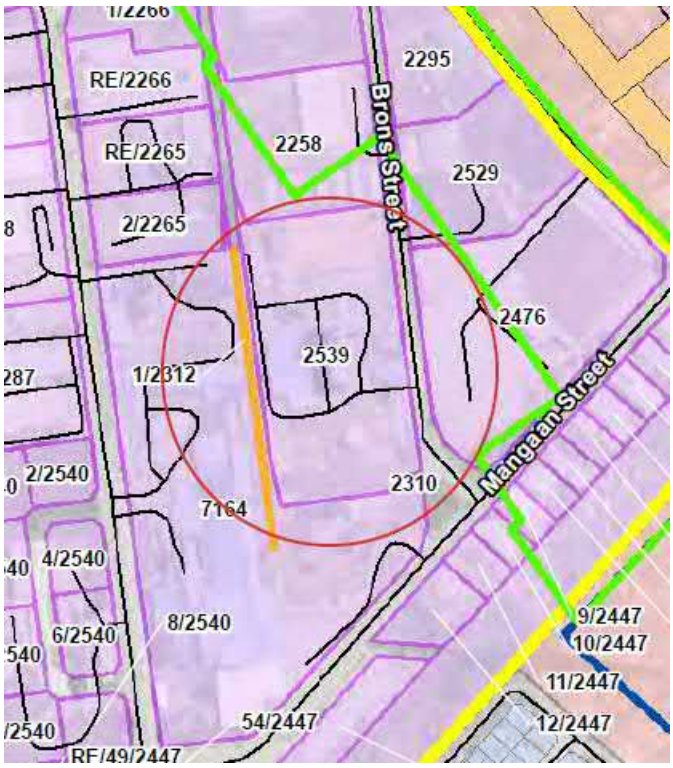
Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

HI Kirthi and Sibanye team,

Thank you for your time today and for the explanation of the process and investigations done to get to this point. As mentioned in the meeting we do understand that this expansion project will extend your shafts lifetime, but we need to ensure that it will have no impact on our operations as well.

Just for info we produce +/-1200t feed per day and slaughter +/-350 000 chickens per day at the processing plant next door which is a 24/7/365 operation.

We also acknowledge that you will have to redo the mining application to exclude our premises from the application, as mentioned by Lesego you will be able to give in writing a confirmation that you will exclude UG mining activities beneath the Epol mill structure for any future expansion projects as discussed in the meeting. Will you please share the area you plan to exclude for any UG activities on the map (as per example) with the horizontal perimeters surrounding the mill. We will be at ease if regulation 17.7 will be exercised.



Referring to the below, in general, if the distance is more than 100m horizontally, no comment from the Chief inspector of Mines is required. If less than 100m, a risk assessment must be done to ensure it is safe, and be submitted to the Chief Inspector for comment.

STAATSKOERANT, 27 MEI 2011

17(7) The employer must take reasonable measures to ensure

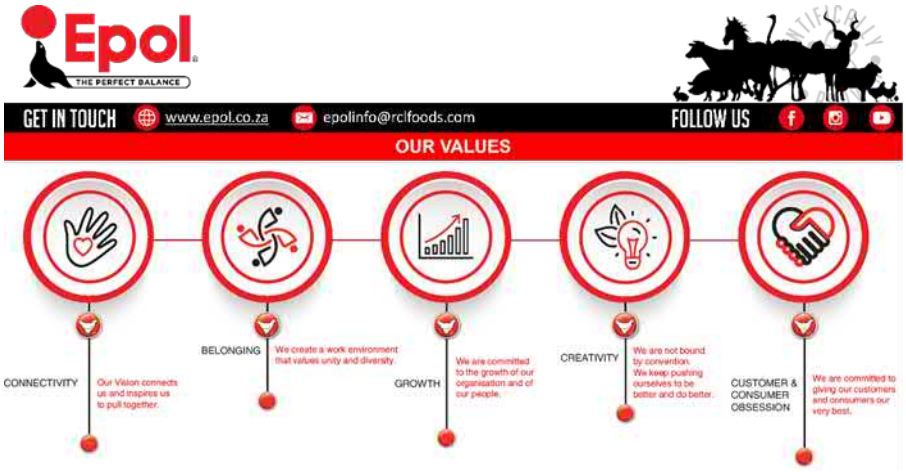
(a) no mining operations are carried out within a horizontal
100 (one hundred) metres from ***reserve land,*** buildin
railways, dams, waste dumps, or any other structure v
including such structures beyond the mining boundari
surface, which it may be necessary to protect in order
any significant risk, unless a lesser distance has been
safe by ***risk assessment*** and all restrictions and
determined in terms of the ***risk assessment*** are complie

Once again thank you for your time and explanation of the processes involved.

PS – May you please comment on the mail shared on 12 Nov'24 regarding the loads exerted by the building. (Also attached)

Looking forward to your response.

Loren Laker
National Engineer



From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 09 December 2024 11:57

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

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Dear Loren,

Thanks for your email. As discussed AvDE will set up a session with the Sibanye Stillwater Team and Epol to discuss the comments raised as well as the monitoring and management plan.

Date: 12 December 2024
Time: 11:00 to 12:00

It would be a teams meeting, AvDE will send through the meeting link.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Loren Laker <
Sent: Monday, 09 December 2024 07:59
To: Kirthi Peramaul <kirthi@avde.co.za>

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Thank you Kirthi,

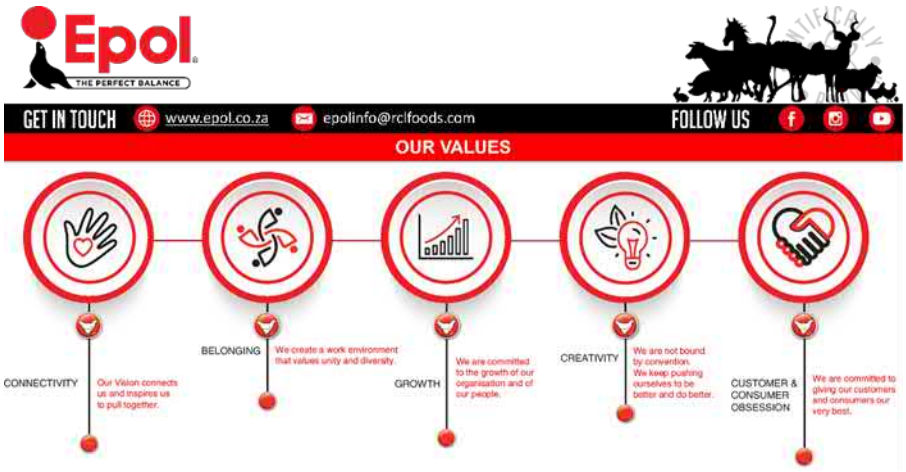
From reports we understand that the proposed UG extension blocks A & B do not include UG activities underneath our mill, our concern is that the extension of the mining rights area expands underneath our mill, there is no clear indication on where future UG expansions will be and how these will influence our mill structure and boreholes.

May we please setup an online meeting to discuss the above mentioned as a matter of urgency, may you please share 3 dates + available times for the meeting?

We are also eagerly awaiting the response on our concerns as per mails of 12 Nov'24 and 5 Dec'24.

Regards.

Loren Laker
National Engineer



From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Friday, 06 December 2024 15:35

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

CAUTION: This email originated from outside of the organization!
DO NOT click links or open attachments unless you recognize the sender and know the content is **SAFE**.

Hi Loren

Thank you for the call.

The Draft Basic Assessment Report is currently available for public review until the 13 December 2024. You are able to access the report using the following Link:

https://altavandykenvironmental.co.za/

The attached map depicts the Epol plant in relation to Mining Blocks A and B.

In addition, your comments as provided on the 5 December is acknowledged by Alta van Dyk Environmental. The project team will be providing a response to your comments.

Subsequent to the response, you are more than welcome to indicate if you require an online meeting with the Sibanye Rock engineers and Specialist team.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Loren Laker
Sent: Friday, 06 December 2024 14:27
To: Kirthi Peramaul <kirthi@avde.co.za>

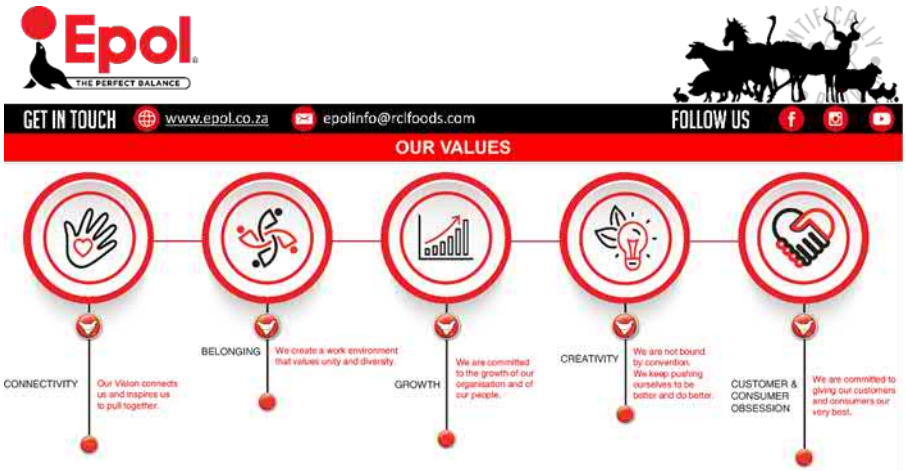
Subject: FW: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

HI Kirthi, our conversation this morning refers please remember to send the new available documents where the exclusion zones are shown for our mill building.

I will confirm if I receive the documents, please note that files larger than 5MB are usually blocked by our server. If the docs are of a larger size, please let me know.

Thank you .

Loren Laker
National Engineer



From: Loren Laker
Sent: Thursday, 05 December 2024 15:22

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Hi Kirthi, Alta,

Subject: Concerns Regarding Mining Activity Beneath the Feed Mill Building

I am writing to formally express our concerns regarding the proposed or ongoing mining activities beneath or in close proximity to our feed mill building, located at 5 Barons Street Rustenburg. As stewards of this facility, which is critical to our operations, we have serious reservations about the potential impacts such activities may have on the structural integrity of the building and the surrounding environment.

Our primary concerns are as follows:

1. **Structural Loads on a Small Footprint**
   The feed mill is designed to support high loads concentrated on a relatively small foundation footprint. Any disruption or alteration of the ground stability beneath this structure could significantly compromise its integrity. Mining activities, particularly those involving excavation, subsidence, or vibration, may exacerbate this risk and lead to potential damage to the building, posing a safety hazard to personnel and jeopardizing operations.

2. **Effect on Soil Water Levels**
   Mining activities often result in changes to local hydrology, including the reduction of groundwater levels. Such a reduction could lead to soil desiccation and settlement, further undermining the stability of the building's foundation. Given the precision engineering of the feed mill, even minor shifts in the subsurface conditions could have disproportionate effects on the facility's performance and longevity.

In light of these we are committed to maintaining open communication and working collaboratively to ensure that both parties can achieve their objectives without compromising safety or operational reliability. Please let us know a convenient time to discuss this matter further or provide additional information regarding the proposed activities and risk mitigation strategies.

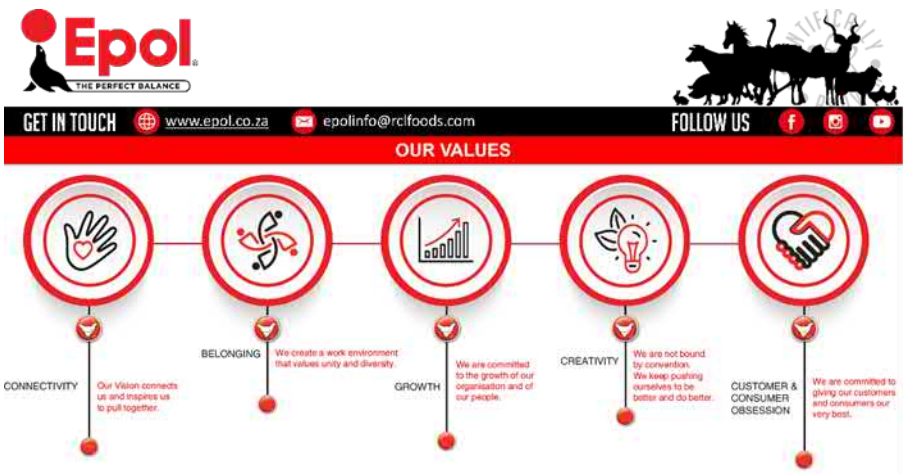
Thank you for your attention to this important matter. We look forward to your prompt response.

We have not received any feedback since Joachim shared our plant drawings?
May you please share feedback regarding our concerns.

Sincerely,

Loren Laker
National Engineer

ADDRESS: John Voster & Nelmapius, Southdowns Ridge Office Park, Centurion, Pretoria



From: Joachim Prinsloo
Sent: Tuesday, 12 November 2024 08:24
To: Kirthi Peramaul <kirthi@avde.co.za>

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Hi

Attached is the basic drawings of the site and buildings.

The factory when it was build, they used 1000 t of steel and 12000 m3 of concrete.
We on average have 15000 to 20000 tons of raw material and finished goods stored on site in the silo's and out loading bins per day.
All of this is pressing on a small footprint of the plant.

We are very concerned about this development and the effect it will have on the site if the water table and ground under us is disturbed, this was not considered when the original design was done.

Kind Regards
JJ.Prinsloo
Operation Manager

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Friday, 08 November 2024 13:10
To: Joachim Prinsloo <

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

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Hi Joachim,

Thank you very much for your prompt response.

AvDE will await the drawings next week.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Joachim Prinsloo <
Sent: Friday, 08 November 2024 12:41
To: Kirthi Peramaul <kirthi@avde.co.za>

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Hi

I will have the draftsman convert the paper drawings next week.
Most are still in paper format.

Kind Regards
JJ.Prinsloo
Operation Manager

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Friday, 08 November 2024 12:30
To: Joachim Prinsloo <

Subject: RE: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

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Dear Joachim

Trust you are well. Please can you share the layout and the location of the epol plant and Silo below surface.

Sibanye Stillwater requires such info to overlay on their mine plan.

Your response will be greatly appreciated.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Joachim Prinsloo <
Sent: Tuesday, 01 October 2024 17:02
To: kirthi@avde.co.za
(
Subject: Sibanye RPM Proposed Expansion of the MR 80 Mining Right Area

Good day Kirthi

Please find attached your registration form.

We are concerned about this development. The Epol plant is going 12 m into the ground and have a silo area of 40 x 20 m with 32 x 500-ton silo, bearing down on the surface, the structure was not design with this in consideration.
We also extract water from under ground to substitute Municipal water.

Kind Regards
JJ.Prinsloo
Operation Manager

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16 January 2025

To: **ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD**
Att: Kirthi Peramaul
Email: kirthi@avde.co.za
Obo: **SIBANYE RUSTENBURG PLATINUM MINES (PTY) LTD**
Copy: PHILLIP RAMPHISA
!

Dear Kirthi,

RE: REQUEST FOR FURTHER INFORMATION REGARDING THE APPLICATION FOR ENVIRONMENTAL AUTHORISATION BY SIBANYE RUSTENBURG PLATINUM MINES (PTY) LTD FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW80MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UNDERGROUND SHALLOW BLOCKS (A & B) ("EA APPLICATION").

1. We write with reference to the above subject matter and the engagements between RCL Foods Consumer (Pty) Ltd t/a Rainbow Chicken ("**Rainbow**"), Sibanye Rustenburg Platinum Mines (Pty) Ltd ("**Sibanye**") and your offices to date.

2. Rainbow wishes to make particular reference to the virtual MS Teams call held on 12 December 2024 between representatives of all the parties, namely, Rainbow, Alta van Dyk Consulting Group ("**AVD**") and Sibanye (herein the "**Call**"). This correspondence does not seek to outline the entire discussion of the Call, but rather to focus and follow up on the concerns raised and requests made by Rainbow during the Call, as well as Sibanye and AVD's representations and commitments made in response thereto.

3. Rainbow records that notwithstanding that the initial public participation process ("**PPP**") in respect of the EA Application and its draft basic assessment report was stipulated by AVD to conclude on 13 December 2024, the Call only took place on 12 December 2024. In the Call, numerous concerns regarding the EA Application were raised by Rainbow, and, in particular, the concerns with Sibanye's inclusion of Rainbow-owned and operated property in the EA Application footprint and the associated likely adverse impacts of blasting, Sibanye's plans to mine in close proximity to and under our building/s, and surface- and groundwater quality. In the Call, Sibanye and AVD committed to providing additional information to Rainbow and to granting Rainbow an extension on the PPP to properly comment on the EA Application documents and new information still to be received.

4. Rainbow understands that, as a result of the above, the PPP for the EA Application is still underway. Save for Sibanye's letter dated 20 December 2024, Rainbow

further notes that following the Call, and despite follow up requests, the information and documentation which Sibanye and AVD committed to providing, has not been received to-date. Rainbow would therefore like to formally follow up on the additional information and documentation, as fully outlined below, to enable Rainbow to properly consider and prepare its comments on the EA Application.

5. In order to participate meaningfully as a registered interested and affected party, and to be provided with all relevant information in respect of the EA Application and Sibanye's proposed activities, Rainbow requested and hereby follows up on its request that Sibanye provide the following information and documentation: -

   a. Geotechnical Reports which include data indicating (i) the distance from the edge of the mining Blocks A & B and Rainbow's building/s situated and described as Erf 2539, Erf 1/2312 and Erf 7164; and (ii) the potential impacts on soil;
   b. Confirmation of all regulatory restrictions, buffers and relevant approvals needed for mining in close proximity to existing structures; and
   c. Updated ground level water drawdown data ensuring that accurate data is considered in the assessment of boreholes 8 and 9, privately owned by Rainbow.

6. Rainbow understands that, pursuant to the Environmental Impact Assessment Regulations, registered interested and affected parties must be provided at least 30 days to review and comment on information and documentation related to the EA Application, including any new information provided by Sibanye in accordance with the above.

7. Please send the aforementioned information and documentation to Mr Loren Laker and Ms Gugu Manyathi at Loren.Laker@epol.co.za and Gugu.Manyathi@rainbowchicken.com, respectively, **by no later than Monday, 20 January 2025**.

8. Should you have any questions, please feel free to reach out to Mr Laker.

9. Rainbow's rights are reserved.

Yours sincerely,

Anina Hunter
MD: Feed

Koen Le Roux
MD: Chicken Processing

Kirthi Peramaul

From: Francois Alberts | Cemblocks
Sent: Friday, 13 December 2024 17:45
To:

Subject: Objection to the Proposed Amendment of Mining Right NW 80 MR and Expansion of Kwezi Mining Operations

To Whom It May Concern,

I am writing on behalf of the following entities to formally object to the proposed amendment of Mining Right NW 80 MR and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A & B):

1. **Cemblocks Pty Ltd**
   Address: 18 Vanadium Street, Rustenburg
2. **Formscaff (Part of the WACO International Group)**
   Address: No. 3 Ferro Street, Rustenburg
3. **Bafokeng Properties**
   Address: 20 and 21 Vanadium Street, Rustenburg

My name is Francois Alberts, and I will be the representative for these businesses in this matter. All correspondence can be directed to my email address: **nfa@cemblocks.co.za**, my cell number: **082 447 8334**, or via our office line at **014 538 0311**.

Grounds for Objection:

1. **Water Supply Concerns**
   The entities mentioned above are not receiving any water supply from the Rustenburg Local Municipality and are entirely dependent on boreholes for their operations. Mining activities in this area will likely have a significant impact on the water table, jeopardizing our ability to access this critical resource.
   - **Cemblocks Pty Ltd** has been operating at this site for over 42 years, employing more than 170 people. Our business cannot survive without a reliable water supply, as water is essential for producing our products.
   - **Bafokeng Properties** faces similar challenges, as the operations of plants on their properties depend heavily on borehole water.
2. **Lack of Guarantees and Responsibility**
   No guarantees have been provided that mining activities will not negatively impact the water supply. Until there is a legally binding agreement in place where the mine accepts full responsibility for ensuring our continued access to water—whether through boreholes or alternative means—we cannot support this project.

Request for Resolution:

We urge you to address these concerns and provide detailed guarantees that:

- Mining operations will not disrupt or deplete our water supply.
- The mining company will take full responsibility for mitigating any negative impact on our water access, including providing alternative sources if borehole water is affected.

Without such assurances, we remain firmly opposed to the proposed mining activities in this area.

Thank you for your attention to this matter. Please confirm receipt of this objection and provide updates on the next steps.

Sincerely,

Francois Alberts
On behalf of:

- Cemblocks Pty Ltd
- Formscaff (WACO International Group)
- Bafokeng Properties



Kirthi Peramaul

From: Francois Alberts | Cemblocks <
Sent: Friday, 13 December 2024 17:45
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Sincerely,

Francois Alberts
On behalf of:

- Cemblocks Pty Ltd
- Formscaff (WACO International Group)
- Bafokeng Properties



Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 12 December 2024 06:36
To:
Cc: 'Reata Colyn'
Subject: RE: OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK, RLM, NORTH WEST PROVINCE

Tracking:

Recipient	Read
'Reata Colyn'	
Melissa van Aswegen	Read: 2024/12/12 06:48

Dear Melissa,

Thank you for your email. Alta van Dyk Environmental Consultants take note of the comments provided.

The project team will be providing a response to the comments raised.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Jacques Gouws <Jacques.Gouws@sibanyestillwater.com>
Sent: Tuesday, 10 December 2024 12:16
To: melissa@dupwest.co.za
Cc: Reata Colyn <reata@avde.co.za>; Yolande Janse van Rensburg <Yolande.JansevanRensburg@sibanyestillwater.com>; Kirthi Peramaul <kirthi@avde.co.za>; Phillip Ramphisa <Phillip.Ramphisa@sibanyestillwater.com>; Jenalee Govender <Jenalee.Govender@sibanyestillwater.com>

Subject: RE: OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK, RLM, NORTH WEST PROVINCE

Good day Melissa,

Thank you for below email.

I hereby acknowledge receipt of your letter dated 6 December 2024 on behalf of the Laurie Cilliers Trust and the A.D. Cilliers Family Trust.

Please know that we are taking your concerns seriously and are working towards addressing them. We are in the process of finalising a Monitoring and Management plan and will set a focus group session up for January 2025 to provide feedback. We are also in consultation internally about your concerns.

Nonetheless, please let me know if you have any questions or queries.

Regards,

Jacques Gouws
Project Management and Controls
SA region | PGM operations or Gold operations

www.sibanyestillwater.com





From: Melissa van Aswegen <
Sent: Monday, 09 December 2024 11:23
To: kirthi@avde.co.za
Cc: 'Nico'
Subject: OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK, RLM, NORTH WEST PROVINCE



Good day,

With reference to the above matter, kindly find attached hereto correspondence for your kind attention.

Kind regards,

Melissa Van Aswegen
Paralegal | Litigation

MEMBER OF THE PHATSHOANE HENNEY GROUP
DupWest Inc.
DU PLESSIS & VAN DER WESTHUIZEN
ATTORNEYS | PROKUREURS

PH GROUP AWARD 2023 GOLD ACHIEVER

Kindly send your complaints or compliments to the following email addresses:
complaints@dupwest.co.za | **compliments@dupwest.co.za**
All emails will be handled with confidentiality by one of our directors. We value your feedback.

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2 Edam Avenue Waterval East Ext 37 Rustenburg 0299
Posbus / PO Box 254, Rustenburg, 0300

www.dupwest.co.za | Tel: (014) 523 4600 | Fax: (014) 592 9539

E-mail: melissa@dupwest.co.za | DOCEX: 9 RUSTENBURG

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ATTORNEYS | PROKUREURS

Prokureurs, Boedelberedderaars, Taksateurs & Aktevervaardigers
Attorneys, Administrators of Estates, Appraisers & Conveyancers

U Verwysing/Your Reference:
Kirthi Peramaul
Ons Verwysing/Our Reference:
N ESTERHUYSE/mva/LAU39/0001

Datum/Date:
06 December 2024

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD
LYTTELTON

BY EMAIL: kirthi@avde.co.za

Dear Sir/Madam

OBJECTION AND COMMENTS TO APPLICATION FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCK, RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

OUR CLIENT: LAURIE CILLIERS TRUST AND A D CILLIERS FAMILY TRUST

We refer to the above matter, as well as previous correspondence, and again confirm that we act on behalf of the Trustees of the Laurie Cilliers Trust (IT: 1327/1984) and the A D Cilliers Family Trust (IT: 861/2002).

Our instructions are to place the following on record on behalf of our clients:

As a landowner within the heavy industrial precinct of Extension-9, Rustenburg, our clients have become aware of the intended plans for underground mining activities beneath this area.

Direkteure / Directors: P.P. Van Der Westhuizen (LI.B); N.J. Esterhuyse (B. Proc. LL. B); Keabetswe Teo (LL.B. LL.M) C.B.Clemente (LL.B Cert. in Deceased Estates Practice); Sue-Mari Swanepoel (LL.B)

Prokureur / Attorney: Frederik Hendrik Terblanche B.Jur. (LL.B); Megan de Kock (LL.B);Robert Dobie (LL.B);Thys Strydom (LL.B); Mariechen Schlotfeldt (B.Com,LL.B); V Moodley (BA LL.B); Yolandé Fourie (LL.B,BA Law) Shawn Van Niekerk (B. Com, LL. B)

Du Plessis & Van Der Westhuizen Inc.
REG. NO. 2001/002076/21

The Phatshoane Henney Group is an association of independent firms, not practicing in partnership and with separate liability.

phatshoanehenney ASSOCIATED LAW FIRMS

Such intended underground mining activities pose a significant threat to the integrity of factory structures, particularly concerning foundational stability. This situation not only jeopardizes the structural integrity but also raises serious human safety concerns. The local authority overseeing this area is the Rustenburg Local Municipality. The building plans regarding our clients' property received approval on February 18, 1988, with endorsements from the Town Planner, Chief Health Inspector, Chief Fire Inspector, Building Inspector, and Town Engineer.

The architect responsible for these designs was Paul van Straten, a distinguished building consultant. It is important to note that the natural ground conditions were deemed unsuitable for construction, necessitating the removal of the existing turf. Trial excavations were conducted to ascertain the depth of the norite base, leading to the complete removal of the turf and the introduction of imported backfill. Dump rock was brought in, and roller compaction was executed in layers of 200mm, with compaction tests submitted for the approval of both the building inspector and the architect, who duly signed off on the work. All excavated soil was transported off-site.

A high probability exists that the intended underground mining activities will have a destabilizing and damaging effect on the underground conditions supporting the current structures erected on the surface of the property.

It is emphasized that the building regulations were rigorously enforced, ensuring that no construction could commence without explicit clearance from the building inspector and the architect's approval, which was duly obtained by our clients. The Rustenburg Local Municipality has designated the relevant area for industrial development and has sold the property for intended factory construction, all while adhering to stringent building regulations.

It is crucial to recognize that all architectural and engineering designs received the necessary approvals from the Municipality, yet there appears to be a lack of awareness regarding the potential underground disturbances that may arise as a result of the intended underground mining activities. These disturbances could lead to water infiltration, mining activities, blasting, vent fan drilling, and dust pollution. Such manmade interventions threaten to compromise the

foundational stability of the structures, resulting in inevitable damage over time.

To mitigate prolonged disputes that could lead to the deterioration of private assets, legal repercussions, and tenant disturbances, our clients would be amendable to a strategic approach. It would serve all parties' interests for the relevant property to be acquired by the interested parties at market-appropriate prices, complemented by the necessary civil groundwork.

Furthermore, the Rustenburg Local Municipality bears the responsibility of safeguarding its infrastructure, which include roads, electrical systems, water pipes, and sewer lines. Should the water pipes contain asbestos and the sewer systems be constructed of clay, these issues must be addressed with due diligence, and appropriate evidence must be presented in this regard.

Kindly ensure that the contents hereof are included in the Interested and Affected Party comments.

Yours faithfully

Du Plessis Van Der Westhuizen Incorporated

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 27 January 2025 07:59
To:
Subject: RE: SIBANYE RUSTENBURG: DRAFT BASIC ASSESSMENT REPORT
Attachments: C4 Groundwater.pdf

Dear Arthur,

Thank you for your email.

All project documentation has been loaded on the Alta van Dyk Environmental (Pty) Ltd website. The link to the website is provided below.

https://altavandykenvironmental.co.za/public-documents/

AvDE has attached the geohydrological study to this email.

The documents are available in English. However, if there is any terminology that is not clear, please send this to AvDE and we will gladly assist you with the translation.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Arthur <uitkyk@lantic.net>
Sent: Friday, 24 January 2025 08:43
To: 'Kirthi Peramaul' <kirthi@avde.co.za>; reata@avde.co.za; jacques.gouws@sibanyestillwater.com
Subject: RE: SIBANYE RUSTENBURG: DRAFT BASIC ASSESSMENT REPORT

Good day Kirthi

Can you please send me the full report done for boreholes and ground water in Afrikaans.

Thank you

Arthur Cockcroft
DIRECTOR: WATERFLEX (PTY) LTD

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Thursday, 23 January 2025 06:53

Subject: RE: SIBANYE RUSTENBURG: DRAFT BASIC ASSESSMENT REPORT

Dear Arthur,

Trust you are well. The Draft Basic Assessment Report is available in English only. However, if there is any terminology that is not clear, please send this to AvDE and we will gladly assist you with the translation.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane • Environmental • Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Arthur
Sent: Tuesday, 21 January 2025 14:02
To: reata@avde.co.za; kirthi@avde.co.za
Subject: FW: SIBANYE RUSTENBURG: DRAFT BASIC ASSESSMENT REPORT

Goeiemiddag

Ek volg graag op rakende my onderstaande versoek en verneem wanneer ek terugvoer kan verwag.

Kind regards / Vriendelike groete

Arthur Cockcroft
DIRECTOR: WATERFLEX (PTY) LTD

From: Arthur
Sent: Thursday, 02 January 2025 13:53
To: 'reata@avde.co.za' <reata@avde.co.za>; 'kirthi@avde.co.za' <kirthi@avde.co.za>
Subject: SIBANYE RUSTENBURG: DRAFT BASIC ASSESSMENT REPORT

Alta van Dyk

Kan u asseblief die volledige kopie aan my in Afrikaans voorsien aangesien ek die Engelse terme nie verstaan nie.

Dankie

Arthur Cockcroft

WATERFLEX (PTY) LTD

6 December 2024

SIBANYE MINE EXTENSION 9, RUSTENBURG

OBJECTION TO MINE UNDER OUR PROPERTY 7 BRONS STREET, RUSTENBURG, EXTENSION 9

We object mining:

1. Due to the risk of damages to our buildings as the result of vibrations.
2. In the long term the risk of sink holes.
3. The lack of insurance that are not willing to insure our buildings on shallow mining.
4. The cut off of our boreholes in full.
5. The pollution of ground water that we use daily to keep our businesses running
6. The risk of losing tenants, for example we have a water bottling factory as tenant
7. The risk of damages in the next 100 years – no responsibility.
8. Bad mining practices if we look at the filthy yards and open spaces of Semenya.
9. The isolation of boreholes is unacceptable, not practical and won't work. We cannot accept it.
10. The transfer of responsibility cannot happen and in case of mining Sibanye must stay responsible for the next 100 years. A trust with enough money to buy us all out must be created as security.
11. Legal and professional costs must be paid by Sibanye.
12. There is no guarantee with the necessary backing that buildings will not crack in the short- and long term.
13. If boreholes and ground water are affected, there is no workable and acceptable plan to restore it.
14. Thousands of jobs will be lost if the shallow mining affect the properties in the area marked for mining.
15. There was no independent advisors to balance the arguments on the meeting 6 November 2024. All advisors paid by Sibanye.
16. There is no buy out agreement in case Sibanye mining activity cut off or pollute our ground water. Ground water is our lifeline of survival in an area with very bad services from the Municipality.
17. There was no consultation with us regarding mining under our premises and our rights.

18. We state categorically that mining will pollute our ground water and cut it off. In case it happen the advisers and investigators and impact study companies must be held responsible as well as directors of all companies and mining company that are involved in the whole operation.

Possible damages by mining under Extension 9:

1. Insurance fall away for land owners.
2. Ground water will be cut off.
3. We will lose tenants.
4. Operations on some properties will come to a stand still.
5. ± 10,000 jobs will be lost.

MR A COCKCROFT
DIRECTOR

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Tuesday, 07 January 2025 08:12
To: 'Arthur Cockcroft'; 'Reata Colyn'
Subject: RE: Myning Sibanya- WATERFLEX RUSTENBURG

Dear Arthur,

Thank you for the information. AvDE will share the information with the project team.

The process of discussions and communications remains open throughout. Sibanye Stillwater is committed to a continuous open, transparent, and fair process.

To facilitate this, Sibanye Stillwater intends to set up a communications forum where they will be providing frequent feedback on studies and the associated management and monitoring plans, hear concerns from interested and affected parties like yourselves, and so forth. More detail will be provided during the month of January 2025.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Arthur Cockcroft
Sent: Friday, 13 December 2024 11:01
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Subject: FW: Myning Sibanya- WATERFLEX RUSTENBURG

Good day Kirthi

Hereby the letter from my insurer's answer as well as the clauses.

I still insist of postponing the comment date of **13 Desember 2025** to pospone for us to comment further.

Waiting then for reply.

Kind regards

Arthur Cockcroft
DIRECTOR
WATERFLEX (pty) ltd

From: Elmarie Snyman <
Sent: Thursday, 05 December 2024 11:40
To: Arthur Cockcroft <

Subject: Mynbedrywighede

Goeie more Arthur,
Sien onder die bewoording ten opsigte van die polisbewoording wat spesifiek skade agv enige mynbedrywighede uitsluit.
Hoop dit help.
As hulle voortgaan met die bedrywighede, moet julle ons asb maar in kennis stel.
Groete

5 Special Perils

damage caused by

5.1 storm, wind, water, hail or snow excluding damage to property

5.1.1 arising from its undergoing any process necessarily involving the use or applic of water;

5.1.2 caused by tidal wave originating from earthquake or volcanic eruption;

5.1.3 in the underground workings of any mine;

5.1.4 in the open (other than buildings, structures and plant [which term shall not include vehicles] designed to exist or operate in the open);

5.1.5 in any structure not completely roofed;

5.1.6 being retaining walls;

} unless so described and specifically insured as a separate item

5.2 aircraft and other aerial devices or articles dropped therefrom including damage cause sonic shockwaves;

5.3 impact by rocks and boulders (other than meteorites, asteroids or similar bodies enterin earth's atmosphere), animals, trees, aerials, satellite dishes or vehicles including ra locomotives and rolling stock excluding damage to such animals, trees, aerials, satellite d or vehicles, railway locomotives or rolling stock or property in or on such vehicles, ra locomotives or rolling stock.

This Peril does not cover

5.1 wear and tear or gradual deterioration;

5.2 damage caused or aggravated by

5.2.1 leakage or discharge from any sprinkler or drencher system in buildings conta Property Insured hereby. This exception shall not apply to damage cause aggravated by such leakage or discharge occurring in areas of the building occupied by the Insured;

5.2.2 subsidence, landslip or heave;

5.2.3 the Insured's failure to take all reasonable precautions for the maintenance safety of the Property Insured and for the minimisation of any damage.

6 Subsidence, Landslip and Heave

Subsidence, Landslip and Heave other than

6.1 damage caused to or by drains, water courses, boundary walls, garden walls, retaining gates, posts or fences unless specifically insured;

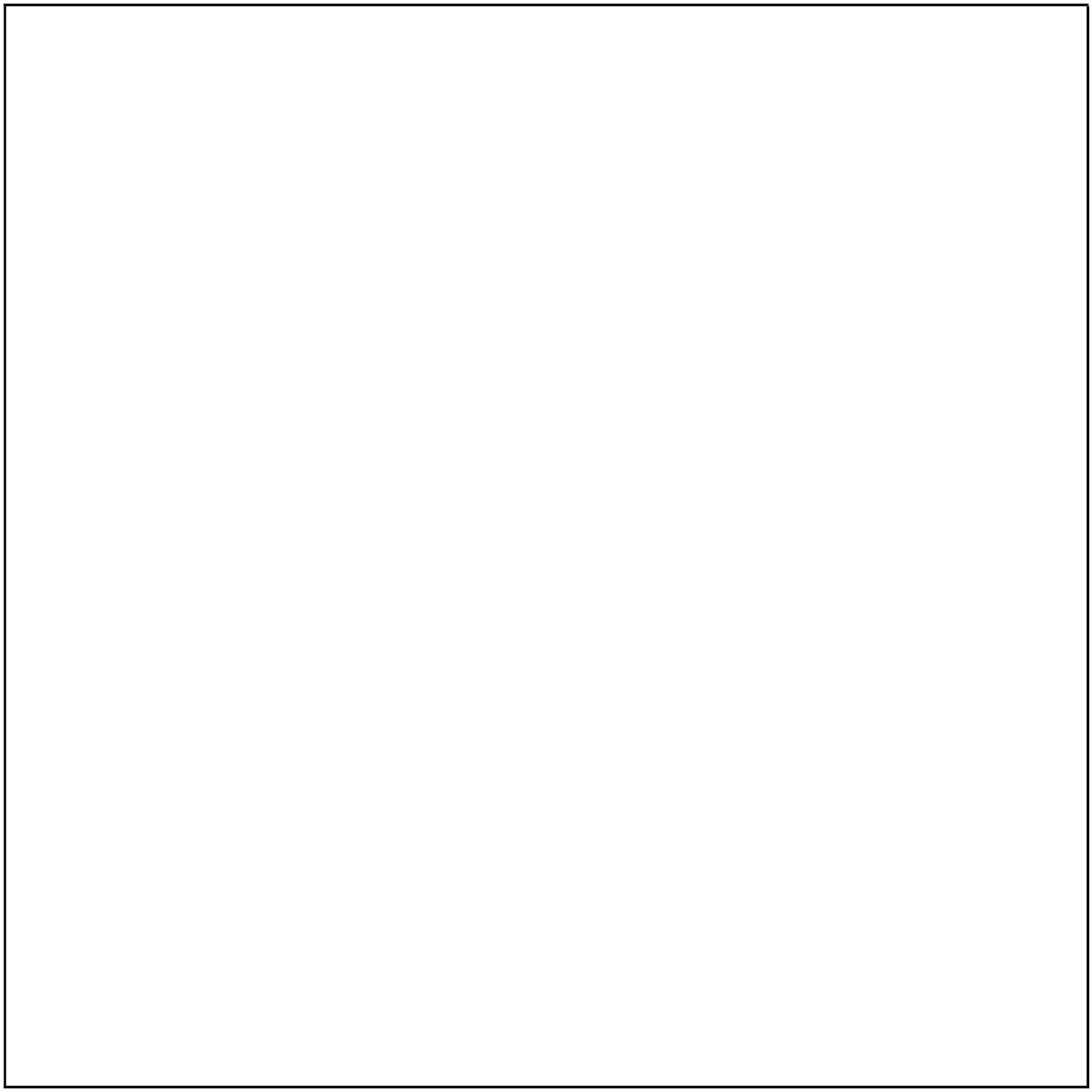
6.2 damage caused by or attributable to

6.2.1 faulty design or construction of, or the removal or weakening of support to, building situated at the Premises;

6.2.2 workmen engaged in making any structural alterations, additions or repairs to building situated at the Premises;

6.2.3 excavation on or under land other than excavations in the course of m operations;

6.2.4 normal settlement, shrinkage or expansion;



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Have feedback or a suggestion? Please use the following link.

Kirthi Peramaul

From: Bertus <
Sent: Thursday, 21 November 2024 15:10
To: 'Kirthi Peramaul'; 'Peter'
Cc:
Subject: RE: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Follow Up Flag: Follow up
Flag Status: Flagged

Good day, thank you for the link, I did attend the meeting.

Can we please request a copy of the recording, and in future please add us to all correspondence in this regard.

Peter Minnaar
Harry Pieterse
Harry Van Asw
Mduduzi Mdai

Kind regards

Bertus Bronkhorst
Manager Finance

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From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: 21 November 2024 01:45 PM
To: 'Peter' <

Cc: 'Reata Colyn' <reata@avde.co.za>; calvin@avde.co.za;
Subject: RE: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Dear Peter,

Hope you are well and thank you for your email.

The meeting invite has been sent through to you now. Please confirm receipt.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Peter
Sent: Thursday, 21 November 2024 13:15
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Cc: 'Reata Colyn' <reata@avde.co.za>; calvin@avde.co.za; Bertus
Subject: RE: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Good Day,

We were informed that there will be a teams meeting this afternoon regarding a crack survey and valuations? As an interested and affected party we would like to be included in this meeting. Kindly send a link to

Many thanks

Kind Regards

Peter Minnaar
NW Recycling Services (Pty) Ltd

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: 13 November 2024 11:28 AM
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Cc: 'Reata Colyn' <reata@avde.co.za>; calvin@avde.co.za
Subject: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Dear Stakeholder

RE: SIBANYE RUSTENBURG PLATINUM MINES, PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B)

Your comment provided has been acknowledged by Alta van Dyk Environmental (Pty) Ltd and Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM). SRPM will be addressing your comment through a Monitoring and Management Plan which will be discussed and shared with you.

Availability of the Draft Basic Assessment Report and Environmental Management Program (EMPR)

The Draft Basic Assessment report is available for public comment for a period of 30 days from 14 November until the 13 December 2024. Details on the availability is provided on the table below:

Public Place	Locality	Physical Address
Rustenburg Local Library	Rustenburg	Corner of President Mbeki Dr and Heystek Street
Kwezi Mine Security Offices	Rustenburg	Rustenburg
Alta van Dyk Environmental Consultants Office	Midstream	9 Mount Sherman Cresent Midlands Estate

In addition to the above mentioned venues, the report is available electronically on the Alta van Dyk Environmental (Pty) Ltd website: https://altavandykenvironmental.co.za/public-documents/ and on the Sibanye Stillwater data free app Ulwazi: https://ulwazi.datafree.co/

Kindly provide your comments by the **13 December 2024.**

If you would like more information on the proposed project, or comment on the proposed project, please direct all enquires to Kirthi Peramaul.

Kind Regards

Kirthi Peramaul
B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

13 December 2024

To whom it may concern,

Objection: Sibanye Shallow Mining

As a concerned property owner in the Zinniaville Industrial area I would like to object to the shallow mining by Sibanye.

This mining operation poses a risk to our property in terms of ground water seepage and pollution and poses a risk to cracks to our buildings creating poor structural integrity. These structural failures may result in our insurance companies not covering these damages.

As a land and property owner I cannot be held responsible for the damages caused by your mining operations.

Yours faithfully

Mr E Suliman

Rustenburg Galvanizers
A division of Inzinc Africa (Pty) Ltd

12 Ferro Street
Rustenburg
North West
South Africa

Po. Box 17349
Benoni West
1503
Gauteng
South Africa

Tel: 014 538 1496
Email: info@rtbgalv.co.za
Web: www.rtbgalv.co.za

GPS: 25°37'44.4"S 27°13'37.7"E

Reg. No: 2006/024603/07
Vat No: 4550265807

12 December 2024

Opposition to planned KWEZI mining expansion application -Extention 9 Rustenburg

Attention: Kirthi@avde.co.za

Rustenburg Galvanizers a Division of Inzinc Africa owns property at 12 Ferro Street Rustenburg (RE/2517) where we employ around 100 people and operate a galvanizing plant. As a sustainable business which has been in existence for almost two decades we would like to register our strongest opposition to the planned shallow mining activities below us as follows:

- We are convinced that the mining activities will introduce risk to compromise the stability of geographical structures below us which will in return introduce risk of structural damage to our structurally sensitive chemical tanks and Zinc kettle.
- Our building structures will, due to the same argument, be compromised and exposed to structural integrity risk.
- The above puts our total capital investment at risk and introduces business sustainability/continuity at risk.
- Mining activities below us will dilute our capital investment as potential buyers will be hesitant to invest in or purchase our business.
- Insurance companies will be unwilling to insure us with shallow mining below us.
- We are dependent on a steady water supply and are not receiving this from the local municipality. We are now dependent on our own borehole to ensure that we can continue with production. The shallow mining will destroy our water supply and render our business un-operable and possibly worthless.

Directors: J du Plessis, APC Peyper, SC Hellings*, DJ Millar*, DMJ Whelan*, FG Langlois*, JJ Tredoux*, DC Odendaal **, *(non-executive), **(Alternate)

- Should the bore hole not dry up, any water supply that we may still have, will be contaminated, rendering it unsuitable for our use. This may cause a possible business collapse.

- Given the history, as well as current inability of mining in South Africa, to rehabilitate end-of-life mines and to secure them (refer- latest illegal mining in SA) the above risk may exponentially increase for us, after the mine has moved on in a few years from now. An extrapolation of current SA illegal mining scenarios will see us ending up with the chaos that illegal mining below us will bring, with no-one to engage with as a recourse or to hold accountable as the mine would have moved on.

Please note our intention to continue to oppose this planned expansion in any way possible as the risks introduced by this planned shallow mining expansion holds inherent capital investment dilution and business feasibility/sustainability/continuity risks for us as well as job security risks for around 100 employees from this community.

Dirk Odendaal
On behalf of Rustenburg Galvanizers a Division of Inzinc Africa

Directors: J du Plessis, APC Peyper, SC Hellings*, DJ Millar*, DMJ Whelan*, FG Langlois*, JJ Tredoux*, DC Odendaal **, *(non-executive), **(Alternate)

Rustenburg Engineering and Foundry (Pty) Ltd
13 Vanadium Street
Industrial Sites Ext. 9
P O Box 1456
Rustenburg, 0300

Phone: +27 14 538 1014
Fax: +27 14 538 1024
www.joerg.co.za

VAT No.: 4240168437
Registration No.: 1964/002498/07

13/12/2024

To whom it may concern

RE: Objection to KWEZI SHALLOW MINING APPLICATION EXT 9

We at Rustenburg Engineering & Foundry (Pty) Ltd object to the KWEZI SHALLOW MINING APPLICATION EXT 9.

Our properties are situated at:
Stand 2190 Portion_2
Stand 2190
2190 Portion_1
Stand 2191

Our objection is due to potential damage to buildings, possible sinkholes caused by the shallow mining activities and the pollution of natural ground water.

Kind regards

Kirthi Peramaul

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Tuesday, 10 December 2024 16:46
To:

Cc: 'Reata Colyn'
Subject: RE: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)
Attachments: RE: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Dear Maita Wzitoma (Pty) Ltd

Thank you for the feedback. Please confirm if there is a link between Maita Wzitoma and Jacques (email:

AvDE received the attached email from Jacques confirming attendance as well as a follow up telephonic call, hence the feedback session was set up accordingly.

However as per the email correspondence below, the feedback session planned for the 12 December 2024 @ 13:00 will be postponed.

The project team has noted the comments and concerns raised, and the team is working towards addressing them. Sibanye Stillwater are in the process of finalising a Monitoring and Management plan and a Focus Group Meeting will be set up for January 2025 to provide feedback.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Wouter van der Westhuizen <woutervdwest@gmail.com>
Sent: Tuesday, 10 December 2024 16:18

Cc: 'Reata Colyn' <REATA@AVDE.CO.ZA>
Subject: Re: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Good day Kirthi et al,

KWEZI SHALLOW MINING APPLICATION UNDER RUSTENBURG INDUSTRIAL AREA EXT 9

MEETING REQUESTED BY YOURSELVES – SEE EMAIL BELOW FROM KIRTHI,

All our previous email correspondence and phone calls have reference.

The deadline for objections by landowners, according to your documentation, is the 13th of December 2024. We have replied to your emails and sent our official objection to your shallow mining application / use of water. See email below dated 9 December 2024. We reserve the right to further expand and escalate our objections as a combined land owner's forum at any later stage.

We do not wish to engage in any teams meetings with yourselves on the 12th of December 2024, where all the other landowners are not present / legally represented. No party should be singled out when matters such as these are discussed. We do not have the privilege of a panel of engineers, etc. to answer and evaluate your claims / statistical information. You must deal with the Rustenburg Ext 9 area land owner forum as a whole.

We hereby request that you postpone your activities to early next year when all the relevant owners / representatives are available to engage you in a combined meeting.

We also made it clear when your representative Cathy called us that all meetings must be done with our legal representatives present so that a proper legal trail can be observed for future use. No discussions will be held in telephonic or teams zoom meetings. Please respect our legal rights and answer the email we sent containing our objection. See below dated 9 December 2024. Our unwillingness to partake, as a single landowner and not as the entire affected parties group as a whole, in a meeting set up by you, cannot and will not in any way prejudice any of our rights and our official objection to your application.

Please postpone these meetings until early 2025 to allow all the affected parties to engage you. It is untoward to book meetings when many affected partis are not able to attend or be represented.

Regards

Maita Wzitoma (Pty) Ltd
Owner / Property Manager & Representative

The above is sent without any prejudice to our rights. We also reserve the right to expand our objections and legal challenges further.

From: Kirthi Peramaul <kirthi@avde.co.za>
Date: Monday, 9 December 2024 at 09:58
To: Wouter van der Westhuizen _____ , Wouter van der Westhuizen

Cc: 'Reata Colyn' <REATA@AVDE.CO.ZA>
Subject: Sibanye Rustenburg Platinum Mines-MR Amendment and Expansion through the Inclusion of the UG Shallows Blocks (A & B)

Dear Wouter

Thank you for your email. Sibanye Stillwater and Alta van Dyk Environmental acknowledge your email dated **7 December 2024.**

Kindly advise on your availability for the **12 December 2024** from **13:00 to 14:00** for a feedback session to discuss the Monitoring and Management Plan.

The above-mentioned meeting will be an online session, and AvDE will share the meeting link once your availability has been confirmed.

In addition to the feedback session, the project team will provide a formal response to your comments raised on the email below.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

From: Wouter van der Westhuizen
Sent: Saturday, 07 December 2024 09:41

Wesley Keeny <

Subject: RE: Kwezi Shallow Mining Application - New Time Proposed: N'Komati Greater Block L HIA and Project Timelines

Good day to everyone,

KWEZI SHALLOW MINING APPLICATION UNDER RUSTENBURG INDUSTRIAL AREA EXT 9

ON BEHALF OF: MAITA WZITOMA PROPERTIES PROPRIETARY LIMITED – PROPERTY OWNER OF ERF 2447 PORTION 60

We hereby notify you of our official opposition to your proposed shallow mining application. This written notification is done in accordance with the 13 December 2024 deadline for objections.

Without limiting our case / future claims, we hereby put forward our current objections:

1. We have been to all the meetings held to date in this regard.
2. We are registered as an affected party – see the email history as reference.
3. All your experts have given estimates of the expected damage to our buildings caused by the 40m deep blasting. A 40m depth will leave our properties and buildings highly vulnerable to blasting damage. You are well aware of this.
4. Your experts have given estimates of mining activities in other areas. Any seismic and water considerations must be done in the are you are planning to mine. These tests must be done in our area before you can apply for mining rights here. No tests done in other areas can be used to make estimates of possible damage to our properties and water resources here.
5. Sinkholes cannot be ruled out – this a fact.
6. Our property comprises multiple units rented out to tenants:
    a. We have a deep borehole in place for the last several years, servicing our tenants and our fire hydrant system. The Municipal water supply is highly unreliable. This being the reason for our use of a dedicated borehole.
    b. Some of our tenants do bulk meat production and retail and water is critical to them on a daily basis for hygiene purposes. Reference the Health Requirements in the National Meat Retailer's Laws.
    c. One of your consultants called us on Thursday (5 December 2024 at 11h15) and informed us that your proposed mining activities will definitely cause the total and immediate loss of our critically needed borehole water.
    d. We would like to inform you that should your proposed mining activities go ahead and we lose our current borehole water, we will hold you and all your related parties personally liable for the loss of any rental income should our tenants vacate due to a lack of water.
    e. We also have tenants testing water pumps for the mines. These testing facilities are highly technical and sensitive to seismic irregularities and are also highly dependent on the availability of continuous water supplies to their testing equipment. Your proposed mining activities will put their business at risk and also our related rental income.
7. Should we lose tenants due to your highly risky shallow mining activities and loss of water, we will not be able to repay the current bond registered on the property. We will hold you personally liable for the loss of rental income to cover the bond.

8. **Property damage deposit required:**
    a. You informed us as the attendees at your meetings that you intend to mine for a period of 5 (FIVE) years.
    b. We hereby request that you as the entity applying for the mining rights, submit a cash damage deposit to our attorney's trust account for the current value of our property, all the improvements and a rental book for 5 years guaranteed rental income to secure our property and rental income should something go wrong due to your highly risky shallow mining activities in our area and underneath us.

c. The deposit sum will be calculated and forwarded to you.
d. Without such a deposit, we will officially oppose any of your proposed activities until it is fully paid.

Going forward:

- We are in discussions with all the major stakeholders, property and business owners / industries in Etx 9 to object to your proposed mining application. You have made it clear that your activities will be of a short nature, while our properties / water resources are our livelihoods for decades to come.
- We have already instructed our attorneys to serve notices in all the necessary offices related to your application, including the Department of Minerals and Energy.

This official notification is sent without prejudice to any of our rights, nor can it limit any of our future possible claims / objections / further objectives we might wish to add to this official objection.

Regards

Maita Wzitoma (Pty) Ltd
Owner / Property Manager & Representative

From: Kirthi Peramaul <kirthi@avde.co.za>
Date: Thursday, 21 November 2024 at 09:32
To: Wouter van der Westhuizen >, Wouter van der Westhuizen

Subject: RE: New Time Proposed: N'Komati Greater Block L HIA and Project Timelines

Hi Wouter,

Hope you are well.

Thank you for the email. Apologies this invite was sent to the incorrect Wouter and this meeting is not applicable to the Sibanye Stillwater Kwezi Project.

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

-----Original Appointment-----
From: Wouter <wouterw@mweb.co.za>
Sent: Thursday, 21 November 2024 09:22
To: 'Kirthi Peramaul'; 'Wouter van der Westhuizen'
Subject: New Time Proposed: N'Komati Greater Block L HIA and Project Timelines
When: Friday, 22 November 2024 10:00-11:00 (UTC+02:00) Harare, Pretoria.
Where: Microsoft Teams Meeting

Good morning Kirthi,

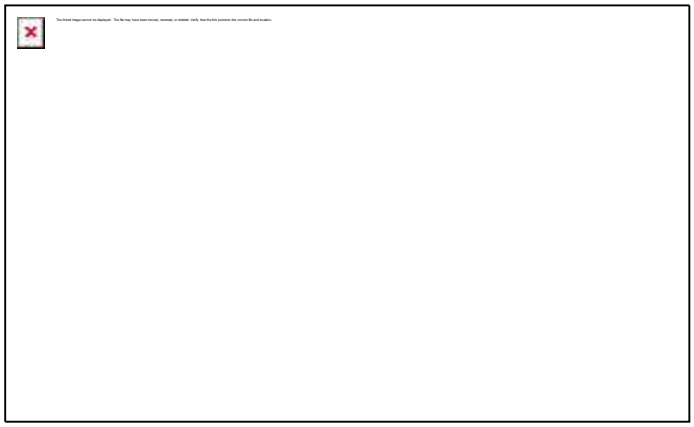
MEETING SET UP – ATTACHED REQUEST FOR POSTPONEMENT

We are not available tomorrow for this meeting on such short notice. We have sent a postponement proposal for next week Tuesday 10h00.

May we ask what the subject matter of your proposed meeting will be, so that we can have our legal team and relevant experts prepped and ready.

As a registered affected party, we have made several requests for our existing crucial borehole to our activities to be confirmed by your specialists. We have not had anyone from your offices contact us regarding this yet.

Warm regards



Property development and rentals since 1982

This email is sent without prejudice to the rights of the landlord/owner/directors/employees.

Kirthi Peramaul

From: Wouter
Sent: Monday, 28 October 2024 09:34
To: 'Kirthi Peramaul'
Cc:
Subject: RE: Sibanye RPM Focus Group Meeting Invite

Good day Kirthi,

CONFIRMATION OF ATTENDANCE

ERF 2447 PORTION 60 AT 10A MANGAAN STREET, RUSTENBURG EXT 9

We hereby confirm that we will be attending the meeting where the AvDE and SRPM Team / Focus Group Meeting will be discussing your comments on the **6 November 2024.**

We will attending as the owners: Maita Wzitoma Properties (Pty) Ltd and its director Mr. Solomon Ramalamola.

Warm regards



Property development and rentals since 1982

This email is sent without prejudice to the rights of the landlord/owner/directors/employees.

From: Kirthi Peramaul <kirthi@avde.co.za>
Sent: Monday, 28 October 2024 08:18
To: 'Kirthi Peramaul' <kirthi@avde.co.za>
Cc: 'Reata Colyn' <REATA@AVDE.CO.ZA>
Subject: Sibanye RPM Focus Group Meeting Invite

Dear Stakeholder,

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTHWEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

Project Background

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM)is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province.

Invitation to a Focus Group Meeting

Your comment on the proposed expansion has been acknowledged by Alta van Dyk Environmental Consultants (Pty) Ltd. Join the AvDE and SRPM Team for a Focus Group Meeting to discuss your comments on the **6 November 2024.** Details of the meeting are provided in the attached Invitation.

Kindly confirm your attendance by **Friday, 01 November 2024.**

Kind Regards

Kirthi Peramaul

B.Sc. Hons Environmental Monitoring & Modelling
Pri.Sci.Nat (400012/18)
Registered EAP (EAPASA 2020, Ref 2020/1537)

Alta van Dyk Corporate Group
Oxidane ▪ Environmental ▪ Environmental Toxicology

Alta van Dyk Corporate Group

Email: kirthi@avde.co.za / Tel: 012 940 9457 / Fax: 086 634 3967 / Cel: 072 2564733

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

I&AP REGISTRATION AND AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT

DMRE Reference: NW30/5/1/2/2/80MR

Section 102 DMRE Reference: NW-00383-MR/102

Applicant: Sibanye Rustenburg Platinum Mines (Pty) Ltd
Location: RE Portion 1 and 27 of Farm Town and Townlands of Rustenburg 272, Various Erven

Project Description: Kwezi Shaft MR Expansion

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft. In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025. Alta van Dyk Environmental (Pty) Ltd (AvDE) has been appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the required environmental-related applications and associated public participation process.

Authorisations required:
Before the commencement of the proposed expansion project, Sibanye requires Environmental Authorisation. The following authorisations are required as per the applicable legislation:

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA.
    - The competent authority for this process is the North West Department of Mineral and Petroleum Resources (DMPR). Previously known as Department of Mineral Resources and Energy (DMRE).
- Water Use Licence Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998).
    - Section 21 c&i and g water uses
    - The Competent Authority is the Department of Water and Sanitation.

Availability of the Draft Basic Assessment Report and Environmental Management Programme
The Draft Basic Assessment and EMPr are available for public review and comment for a period of 30 days from **14 November to 13 December 2024** at the venues listed in the table below. The report is also available electronically on the either the data free Ulwazi platform or AvDE Website:
https://ulwazi.datafree.co/ https://www.altavandykenvironmental.co.za/public-documents/

Public Place	Locality	Physical Address
Rustenburg Local Library	Rustenburg	Corner of President Mbeki Dr and Heystek Street
Kwezi Mine Security Offices	Rustenburg	Rustenburg
Alta van Dyk Environmental Consultants Office	Midstream	9 Mount Sherman Cresent Midlands Estate

In terms of the Water Use License Application the comment period is from the **14 December 2024 until the 04 February 2025.** If you would like more information on the proposed project, register as an Interested & Affected Party or wish to provide comments on the project or the Draft Basic Assessment Report, please direct them to

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457 Fax number: 086 634 3967
Postal Address: Postnet Suite #745,
Private Bag X 1007,
Lyttelton, 0140
Email: kirthi@avde.co.za

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

KITSISO YA KOPO YA TUMELELO YA TIRISO YA TIKOLOGO, LE KOPO YA TUMELELO YA TIRISO YA METSI GO TLHABOLOLA TUMELELO YA MOEPO YA 80 MR, GAMMOGO LE KATOLOSO YA MOEPO YA KWEZI KA GO TSENYELETSA DIKAROLWANA TSA UG (KAROLWANA A LE B)

MASEPALA LEGAE WA RUSTENBURG, PROFENSENG YA BOKONE BOPHIRIMA

GO IKWADISA GA MALOKO A A AMEGANG, LE A A NAMG LE KGATLHEGO, LE PHATLHALATSO YA KOPO YA TUMELELO YA TIRISO YA TIKOLOGO

DMRE Reference: NW30/5/1/2/2/80MR

Section 102 DMRE Reference: NW-00383-MR/102

Kopo e dirwa ke: Sibanye-Rustenburg Platinum Mines
Lefelo la Projeke: Karolo ya ntlha ya Polase ya Town le Townlands ya Rustenburg 272 (dikarolwana tse di farologaneng)

Tlhaloso ya Projeke: Katoloso ya tumelelo ya moepo wa Kwezi

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) ke karolo e nngwe e e welang ka fa tlase ga setlhopha sa dikgwebo tsa Sibanye Stillwater Limited. Kwezi Shaft e ka fa tlase ga taolo ya Sibanye Rustenburg Platinum Mines (Pty) Ltd. Kwezi Shaft e epa leswika la UG2 le le setseng, ka fa tlase ga lefelo la moepo la nomoro ya kitsiso ya NW 30/5/1/2/2/80 MR. Shafote e, e bonala e ya kwa tlase ka go ntsha diminerale, mme e tlile go dira go fitlha ka ngwaga wa 2027. Go na le tlhokagalo ya go thwala diminerale tsa Platinum Group Metals (PGMs) ka bonako go dira gore Shafote ya Kwezi e kgone go fitlhelela go epa diminerale tse di lebeletsweng.

Ke maikaelelo a Sibanye Rustenburg Platinum go katolosa mafelo a a dumeletsweng a ditirelo tsa meepo, ka fa tlase ga tumelelo ya (NW 30/5/1/2/2/80 MR) ka go tsenyeletsa dinaga tsa mafelo a a farologaneng kwa motse -seteropong wa Rustenburg, Profinsi ya Bokeno Bophirima. Godimo ga katoloso ya moepo e e akanngwang, SRPM e rata e ka epa leswika la UG2 Shallows (Karolo A le B)

Dikopo tse di tlhokegang:
Pele ga katoloso e e tshitshinngwang, Sibanye Rustenburg Platinum Mines (Pty) Ltd e tlhoka tumelelo ya tiriso ya tikologo. Go tlhokega Dikopo le ditumelelano tse di tlhokegang ke tse di latelang:

- Tlhatlhobo ya tikologo e e sosobantsweng go ya ka molao Bosetšhaba wa Tikologo (NEMA) (Molao 107 wa 1998) (NEMA) le molao wa tlhokomelo ya matlakala a a tswang mo meepong (Waste Act (59 ya 2008), e tshegetsa kopo ya S102 jaaka e tlhalosiwa ke MPRDA.
    - Setheo se se nang le bokgoni jwa go dira jalo ke Lefapha la Diminerale le Didiriswa tsa Petroleum la Bokone Bophirima (DMPR). E e neng e itsege pele jaaka Lefapha la Dithoto tsa Diminerale le Maatla (DMRE).
- Kopo ya tiriso ya metsi go ya ka Molao wa Bosetšhaba wa tiriso ya metsi (NWA) (Act 36 ya 1998)
    - Karolo ya 21 c, i, le g ya badirisi ba metsi
    - Lefapha la Metsi le botlhweki (DWS) ke lona le nang le maikarabelo a kopo e.

Phatlhalatso ya kopo ya tumelelo ya tiriso ya tikologo le lenaneo la thulaganyo.

Tokumente ya kopo ya tiriso ya tikologo e phatlaladitswe go fa setshaba nako ya go e sekaseka, malatsi a le 30, go tloga go 14 Ngwanatsele (November) go fitlha go 13 Sedimonthole (December) 2024 mo mafelong a a latelang. Tokumente e bile e ka fitlhelwa ka tsela ya setegniki mo websaeteng ya AVDE, kgotsa mo platefomong ya Ulwazi e e sa diriseng *data*.

https://ulwazi.datafree.co/
https://www.altavandykenvironmental.co.za/public-documents/

Lefelo la Setšhaba	Teropo	Aterese
Bobolokelo jwa dibuka kwa Rustenburg	Rustenburg	Corner of President Mbeki Dr and Heystek Street
Di-Ofisi tsa tshireletso tsa Moepo wa Kwezi	Rustenburg	Rustenburg
Ofisi ya Alta van Dyk Environmental Consultants	Midstream	9 Mount Sherman Cresent Midlands Estate

Mabapi le kopo ya tiriso ya metsi, setshaba se filwe go tloga ka 14 Sedimonthole (December) 2024 go fitlhela ka 4 Tlhakole (February) 2025 go sekaseka tokumente.
Fa o rata go ikwadisa jaaka motho yo a amegang kgotsa yo a nang le kgatlhego mo Projekeng e, e bile o rata go ka amogela kitso e e tseneletseng ka ga Projeke, o kopiwa gore o ikopanye le:

Kirthi Peramaul

Alta van Dyk Environmental Consultants (Pty) Ltd

Nomoro ya mogala: 012 940 9457

Nomoro ya fekese: 086 634 3967

Aterese ya poso: Postnet Suite #745,
Private Bag X 1007,
Lyttelton, 0140

Emeile: kirthi@avde.co.za

Go latela kgaolo ya lesome nngwe (11) ya Tshireletso ya Tshedimosetso ya Sebele ya Semolao, tshedimosetso yotlhe e e kokoantsweng e tla e dirisiwa fela mo tsamaisong ya kopo ya tumelelo ya tirso ya tikologo le tiriso ya metsi

Reis saam met NG Kerk Rustenburg op pad na 175 jaar



Die gemeente se tweede hoeksteen - 'n granietweergawe van die oorspronklike weergawe - is op 20 April 1935 gelê.



Die NG Rustenburg Moedergemeente se heel eerste hoeksteen uit sandsteen wat op 23 April 1898 gelê is.



Hierdie pragtige marmer-gedenkplaat is tydens die gemeente se eeufeesvieringe in 1950 onthul.



'n Brons-gedenkplaat wat in 1975 by die kerk onthul is nadat restorasie afgehandel is.

RUSTENBURG HERALD - RUSTENBURG - Een van die grootste mylpale in die reisplan van enige individu, ondernemings of plaaslike instansies word in Januarie 2025 gevier wanneer die NG Rustenburg Moedergemeente sy 175ste bestaansjaar herdenk.

Rustenburgers en trouens, alle NG-lidmate of ander belangstellendes, word genooi om saam met die gemeente te reis op die pad na sy feesvieringe van 24 tot 26 Januarie aanstaande jaar. Almal word natuurlik genooi om hierdie luisterryke geleentheid prominent in hul dagboeke aan te teken en die feesvieringe te ondersteun - meer besonderhede hieroor sal binnekort aangekondig word.

175 JAAR
NG RUSTENBURG MOEDERGEMEENTE
21/01/1850-21/01/2025

Vandeesweek - 'n kort oorsig na dié gemeente se hoekstene wat deur die loop van jare gelê is ten einde bepaalde mylpale in die geskiedenis van die gemeente af te baken. Die oorspronklike hoeksteen uit sandsteen is op 23 April 1898 deur kommandant-generaal Piet Joubert gelê. Joubert was in daardie stadium visepresident van die Zuid-Afrikaansche Republiek.

Op 20 April 1935 word 'n bykomende graniethoeksteen bygevoeg met identiese bewoording. In 1950 vier die gemeente sy eeufeesviering waartydens 'n bykomende marmer-gedenkplaat in die kerk opgerig is.

Nog 'n belangrike stukkie geskiedenis wat deur 'n besondere gebeurtenis geboekmerk is, het in 1975 gevolg toe die Raad van Nasionale Gedenkwaardighede se monumentekomitee 'n gedenkplaat by die kerk aangebring het nadat restorasiewerk aan die kerkgebou voltooi is. In voorbereiding op die gemeente se 175ste bestaans-jaarvieringe is 'n uitgebreide restorasieprojek by die gemeente tans in volle swang.

Die gemeente is uiters opgewonde oor die huidige restorasiewerk en sien daarna uit om die kerk se grootste mylpaal vroeg in Januarie 2025 saam met Rustenburgers te vier.

KITSISO YA KOPO YA TUMELELO YA TIRISO YA TIKOLOGO, LE KOPO YA TUMELELO YA TIRISO YA METSI GO TLHABOLOLA TUMELELO YA MOEPO YA 80 MR, GAMMOGO LE KATOLOSO YA MOEPO YA KWEZI KA GO TSENYELETSA DIKAROLWANA TSA UG (KAROLWANA A LE B)

MASEPALA LEGAE WA RUSTENBURG, PROFENSENG YA BOKONE BOPHIRIMA

GO IKWADISA GA MALOKO A A AMEGANG, LE A A NAMG LE KGATLHEGO, LE PHATLHALATSO YA KOPO YA TUMELELO YA TIRISO YA TIKOLOGO

DMRE Reference: NW30/5/1/2/2/80MR

Section 102 DMRE Reference: NW-00383-MR/102

Kopo e dirwa ke: Sibanye-Rustenburg Platinum Mines
Lefelo la Projeke: Karolo ya ntlha ya Polase ya Town le Townlands ya Rustenburg 272 (dikarolwana tse di farologaneng)

Tlhaloso ya Projeke: Katoloso ya tumelelo ya moepo wa Kwezi
Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) ke karolo e nngwe e e welang ka fa tlase ga setlhopha sa dikgwebo tsa Sibanye Stillwater Limited. Kwezi Shaft e ka fa tlase ga taolo ya Sibanye Rustenburg Platinum Mines (Pty) Ltd. Kwezi Shaft e epa leswika la UG2 le le setseng, ka fa tlase ga lefelo la moepo la nomoro ya kitsiso ya NW 30/5/1/2/2/80 MR. Shafote e, e bonala e ya kwa tlase ka go ntsha diminerale, mme e tlile go dira go fitlha ka ngwaga wa 2027. Go na le tlhokagalo ya go thwala diminerale tsa Platinum Group Metals (PGMs) ka bonako go dira gore Shafote ya Kwezi e kgone go fitlhelela go epa diminerale tse di lebeletsweng.

Ke maikaelelo a Sibanye Rustenburg Platinum go katolosa mafelo a a dumeletsweng a ditirelo tsa meepo, ka fa tlase ga tumelelo ya (NW 30/5/1/2/2/80 MR) ka go tsenyeletsa dinaga tsa mafelo a a farologaneng kwa motse -seteropong wa Rustenburg, Profinsi ya Bokeno Bophirima. Godimo ga katoloso ya moepo e e akanngwang, SRPM e rata e ka epa leswika la UG2 Shallows (Karolo A le B)

Dikopo tse di tlhokegang:
Pele ga katoloso e e tshitshinngwang, Sibanye Rustenburg Platinum Mines (Pty) Ltd e tlhoka tumelelo ya tiriso ya tikologo. Go tlhokega Dikopo le ditumelelano tse di tlhokegang ke tse di latelang:

- Tlhatlhobo ya tikologo e e sosobantsweng go ya ka molao Bosetšhaba wa Tikologo (NEMA) (Molao 107 wa 1998) (NEMA) le molao wa tlhokomelo ya matlakala a a tswang mo meepong (Waste Act (59 ya 2008), e tshegetsa kopo ya S102 jaaka e tlhalosiwa ke MPRDA.
  - Setheo se se nang le bokgoni jwa go dira jalo ke Lefapha la Diminerale le Didiriswa tsa Petroleum la Bokone Bophirima (DMPR). E e neng e itsege pele jaaka Lefapha la Dithoto tsa Diminerale le Maatla (DMRE).
- Kopo ya tiriso ya metsi go ya ka Molao wa Bosetšhaba wa tiriso ya metsi (NWA) (Act 36 ya 1998)
  - Karolo ya 21 c, i, le g ya badirisi ba metsi
  - Lefapha la Metsi le botlhweki (DWS) ke lona le nang le maikarabelo a kopo e.

Phatlhalatso ya kopo ya tumelelo ya tiriso ya tikologo le lenaneo la thulaganyo.

Tokumente ya kopo ya tiriso ya tikologo e phatlaladitswe go fa setshaba nako ya go e sekaseka, malatsi a le 30, go tloga go 14 Ngwanatsele (November) go fitlha go 13 Sedimonthole (December) 2024 mo mafelong a a latelang. Tokumente e bile e ka fitlhelwa ka tsela ya setegniki mo websaeteng ya AVDE, kgotsa mo platefomong ya Ulwazi e e sa diriseng data.
https://ulwazi.datafree.co/
https://www.altavandykenvironmental.co.za/public-documents/

Lefelo la Setšhaba	Teropo	Aterese
Bobolokelo jwa dibuka kwa Rustenburg	Rustenburg	Corner of President Mbeki Dr and Heystek Street
Di-Ofisi tsa tshireletso tsa Moepo wa Kwezi	Rustenburg	Rustenburg
Ofisi ya Alta van Dyk Environmental Consultants	Midstream	9 Mount Sherman Cresent Midlands Estate

Mabapi le kopo ya tiriso ya metsi, setshaba se filwe go tloga ka 14 Sedimonthole (December) 2024 go fitlhela ka 4 Tlhakole (February) 2025 go sekaseka tokumente.
Fa o rata go ikwadisa jaaka motho yo a amegang kgotsa yo a nang le kgatlhego mo Projekeng e, e bile o rata go ka amogela kitso e e tseneletseng ka ga Projeke, o kopiwa gore o ikopanye le:

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Nomoro ya mogala: 012 940 9457
Nomoro ya fekese: 086 634 3967
Aterese ya poso: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
Emeile: kirthi@avde.co.za

Go latela kgaolo ya lesome nngwe (11) ya Tshireletso ya Tshedimosetso ya Sebele ya Semolao, tshedimosetso yotlhe e e kokoantsweng e tla e dirisiwa fela mo tsamaisong ya kopo ya tumelelo ya tirso ya tikologo le tiriso ya metsi

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

I&AP REGISTRATION AND AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT

DMRE Reference: NW30/5/1/2/2/80MR

Section 102 DMRE Reference: NW-00383-MR/102

Applicant: Sibanye Rustenburg Platinum Mines (Pty) Ltd
Location: RE Portion 1 and 27 of Farm Town and Townlands of Rustenburg 272, Various Erven

Project Description: Kwezi Shaft MR Expansion

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) is a subsidiary entity within the Sibanye Stillwater Limited group of companies. Kwezi Shaft is owned and operated by Sibanye Rustenburg Platinum Mine (Pty) Ltd. The Kwezi Shaft is mining the UG2 reserve as within the mining lease limits described under the mining right NW 30/5/1/2/2/80 MR. The shaft is considered to be on its production decline phase with the expected life of mine to be until 2027. There is an urgent need to find additional ounces of Platinum Group Metals (PGMs) in order for the Kwezi shaft to maintain a sustainable production profile.

It is the intention of SRPM to expand the Mining Right Area (NW 30/5/1/2/2/80 MR) through the incorporation of an area over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi Shaft. In addition to the expansion of the Mining Right Area, SRPM intends to mine the UG2 Shallows Blocks (Blocks A and B). Timely addition of the UG2 Shallows blocks to the existing Kwezi production profile is required to optimise existing critical mass before decline in early 2025. Alta van Dyk Environmental (Pty) Ltd (AvDE) has been appointed as the independent Environmental Assessment Practitioner (EAP) to undertake the required environmental-related applications and associated public participation process.

Authorisations required:
Before the commencement of the proposed expansion project, Sibanye requires Environmental Authorisation. The following authorisations are required as per the applicable legislation:

- Basic Assessment (BA) Process in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) and National Environmental Management Waste Act (Act 59 of 2008) supporting a S102 Application as defined within the MPRDA.
  - The competent authority for this process is the North West Department of Mineral and Petroleum Resources (DMPR). Previously known as Department of Mineral Resources and Energy (DMRE).
- Water Use Licence Application (WULA) in terms of the National Water Act (NWA) (Act 36 of 1998).
  - Section 21 c&i and g water uses
  - The Competent Authority is the Department of Water and Sanitation.

Availability of the Draft Basic Assessment Report and Environmental Management Programme
The Draft Basic Assessment and EMPr are available for public review and comment for a period of 30 days from **14 November to 13 December 2024** at the venues listed in the table below. The report is also available electronically on the either the data free Ulwazi platform or AvDE Website:
https://ulwazi.datafree.co/ https://www.altavandykenvironmental.co.za/public-documents/

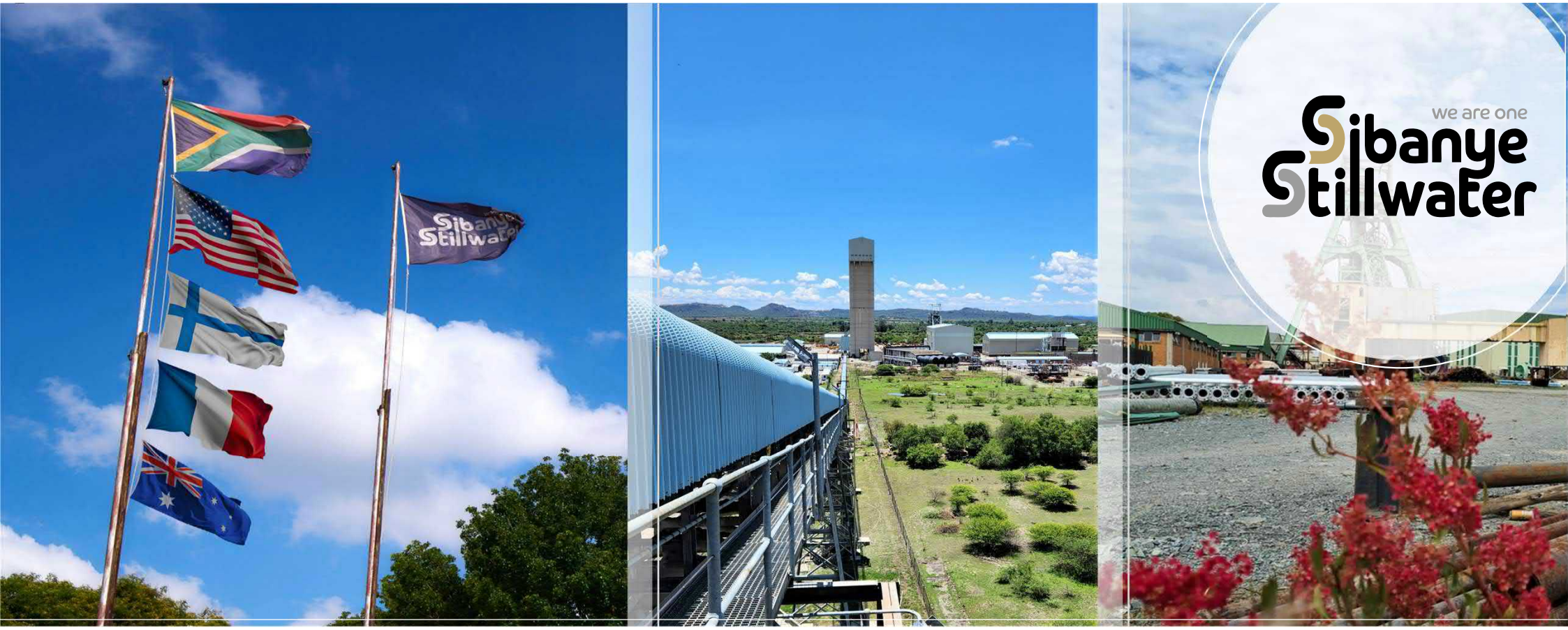
Public Place	Locality	Physical Address
Rustenburg Local Library	Rustenburg	Corner of President Mbeki Dr and Heystek Street
Kwezi Mine Security Offices	Rustenburg	Rustenburg
Alta van Dyk Environmental Consultants Office	Midstream	9 Mount Sherman Cresent Midlands Estate

In terms of the Water Use License Application the comment period is from the **14 December 2024 until the 04 February 2025.** If you would like more information on the proposed project, register as an Interested & Affected Party or wish to provide comments on the project or the Draft Basic Assessment Report, please direct them to

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457 Fax number: 086 634 3967
Postal Address: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za

In terms of Section 11 of the Protection of Personal Information Act (POPIA), all personal information collected will be processed lawfully and explicitly for the Environmental Authorisation and Water Use Licence Application Processes.

Epol/Rainbow



Kwezi Project – Stakeholder Presentation

12 December 2024

Specialist Presentation
Structural loads on small footprint

Alan Olivier

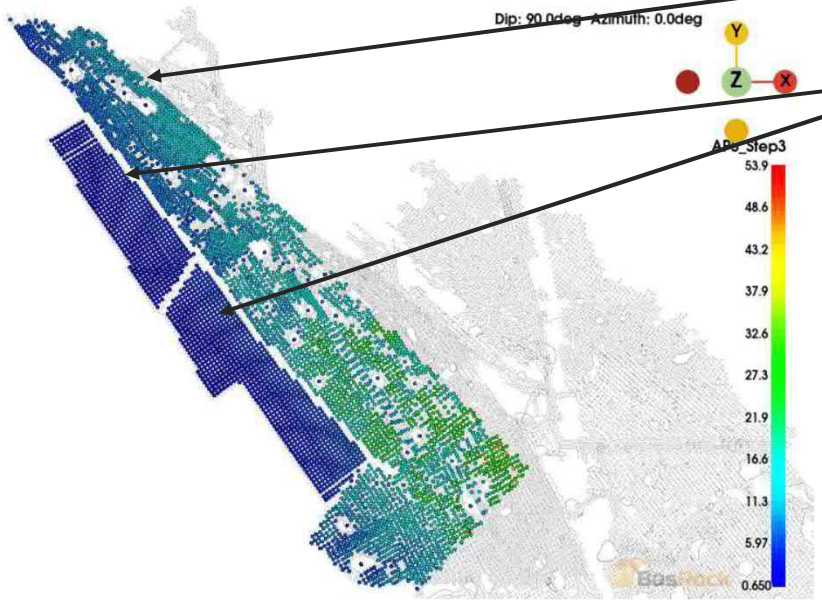
Vibration and Stability Impact Assessment

Technical Input Rock Engineering

- Numerical Modelling.
  - Pillar Stability
  - Subsidence
  - Blasting Vibration

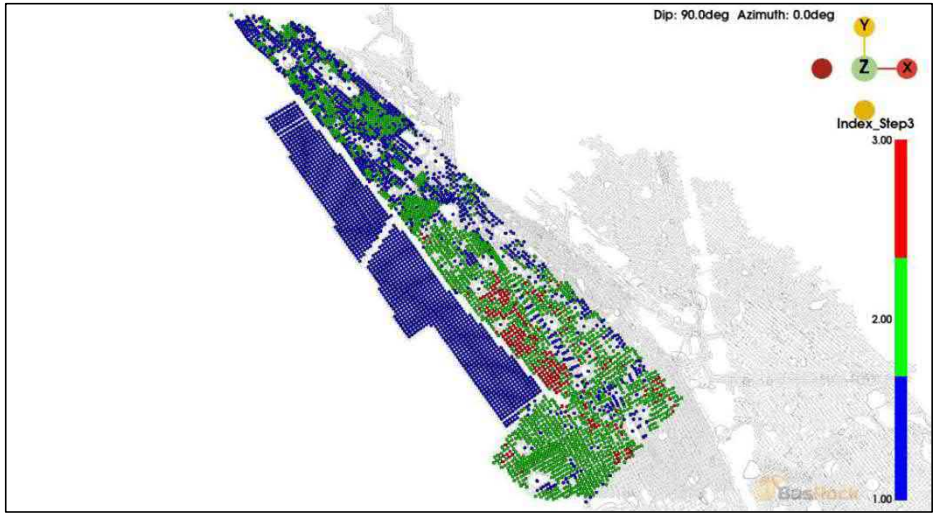
Numerical Modelling - Pillars

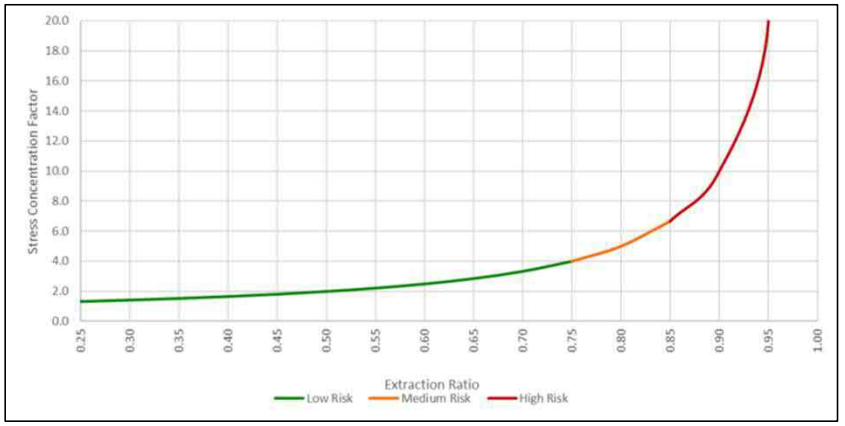
- Average Pillar Stresses (APS) for each individual pillar in the as mined and planned areas.
- Average Pillar stress 5.97 MPa in the area, very low. Pillar failure is unlikely.



Numerical Modelling - Pillars

- Categorized Risk Classification is the Theoretical Extraction ratio (e) and Stress Concentration Factor SCF for each individual Pillar.





From the Risk Classification the Risk Rating for the proposed pillars are classified as low

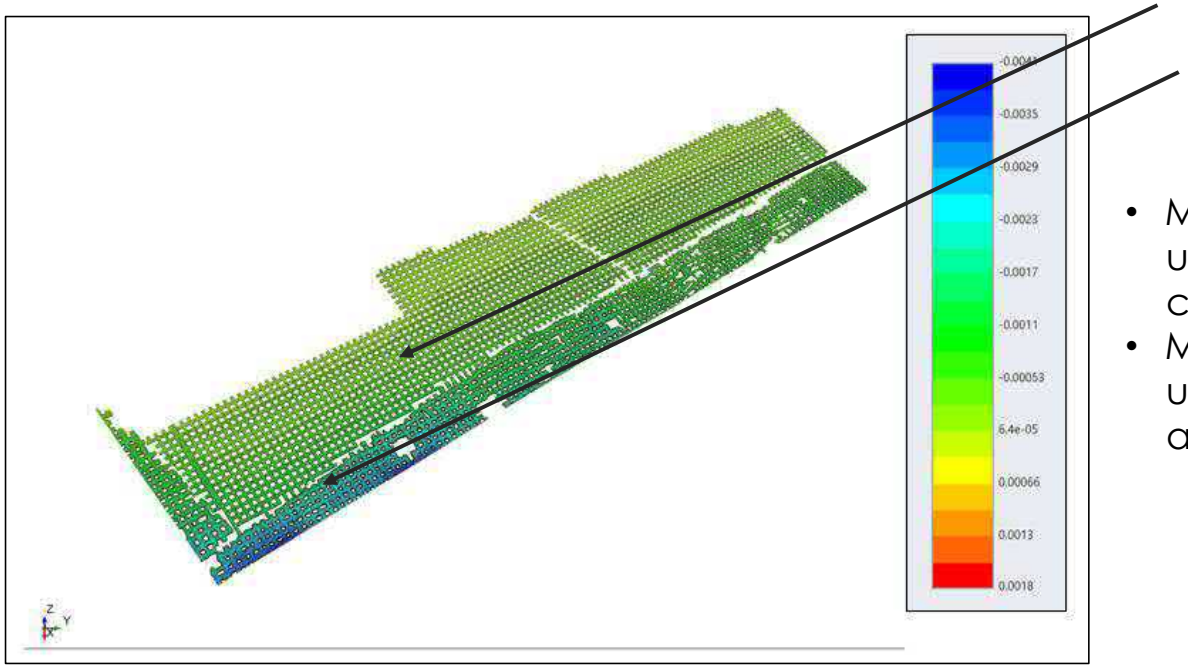
The likelihood of having total pillar collapse is low due to high FoS on the Pillars.

Numerical Modelling – Schedule Assessment

- Two Methodologies deployed an absolute worst case scenario simulates a complete collapse of the pillar system.

- Second methodology assesses the likely subsidence through 3D modelling looking at expected underground displacements as well as superimposing the surface contours.

Numerical Modelling Anticipated Scenario Underground Vertical Displacements

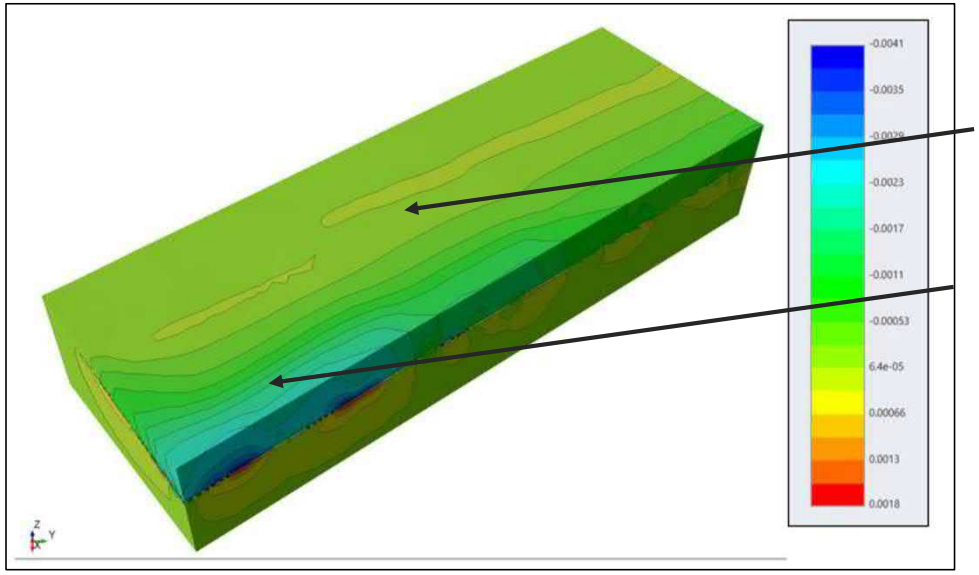


- Maximum vertical displacements underground is expected in the center of the proposed mining.
- Maximum vertical displacements underground at previously mined areas is expected to be 4 mm.

Numerical Modelling Anticipated Scenario Surface Vertical Displacements

- Two Methodologies deployed an absolute worst case scenario simulates a complete collapse of the pillar system.

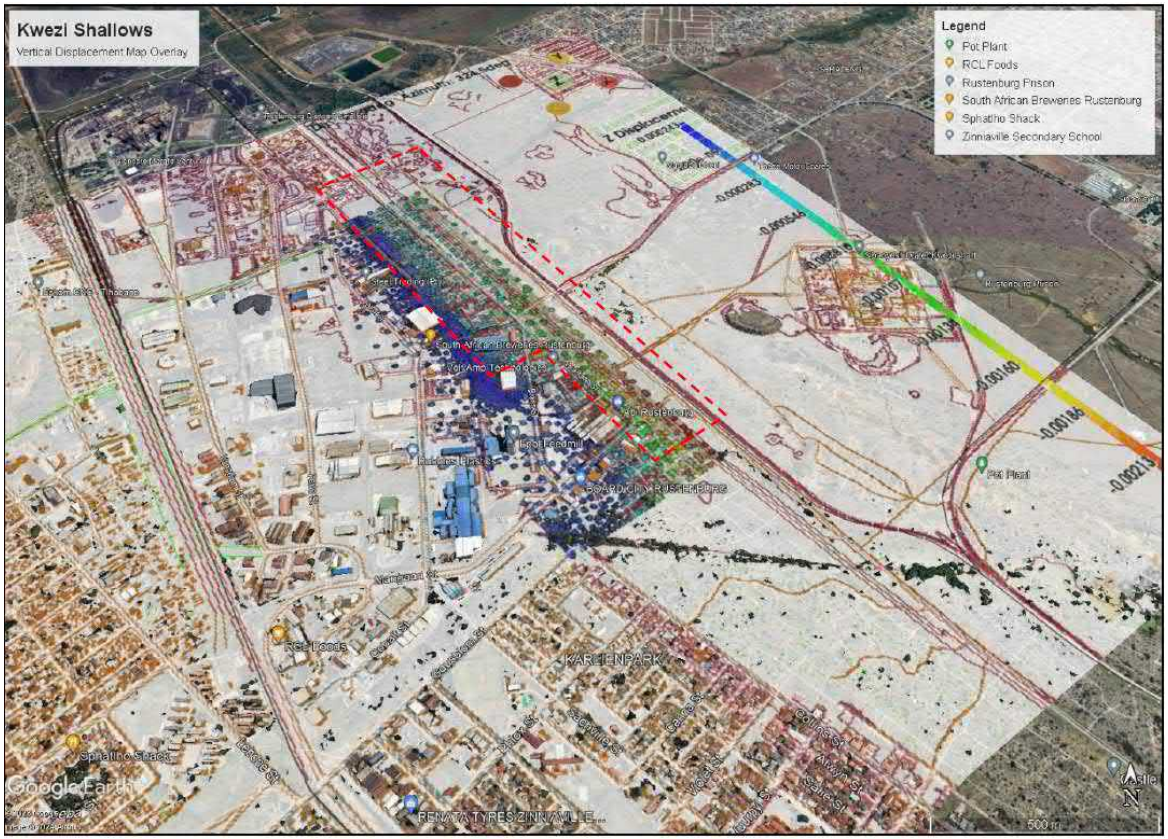
- Second methodology assesses the likely subsidence through 3D modelling looking at expected underground displacements as well as superimposing the surface contours.



- Maximum vertical displacements expected on surface < 0.5mm in the shallow areas of the proposed mining.

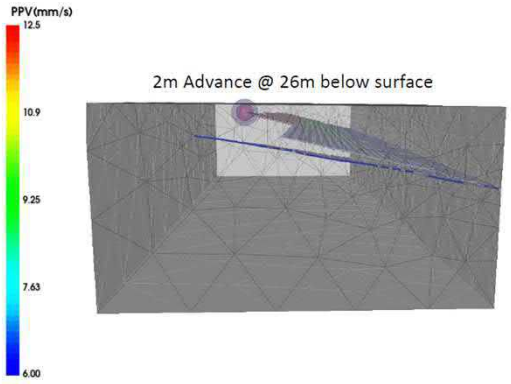
- Maximum vertical displacements expected on surface from the already mined areas is expected to be 2.5 mm.

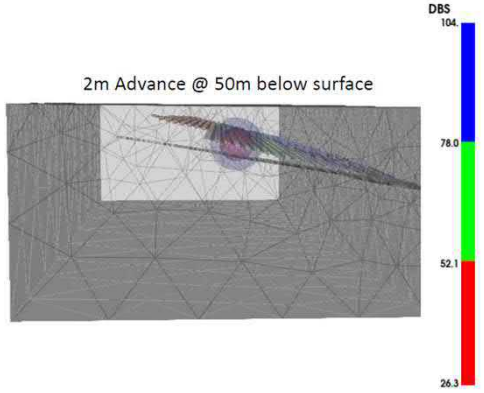
Numerical Modelling
Superimposed Expected Elastic Deformation



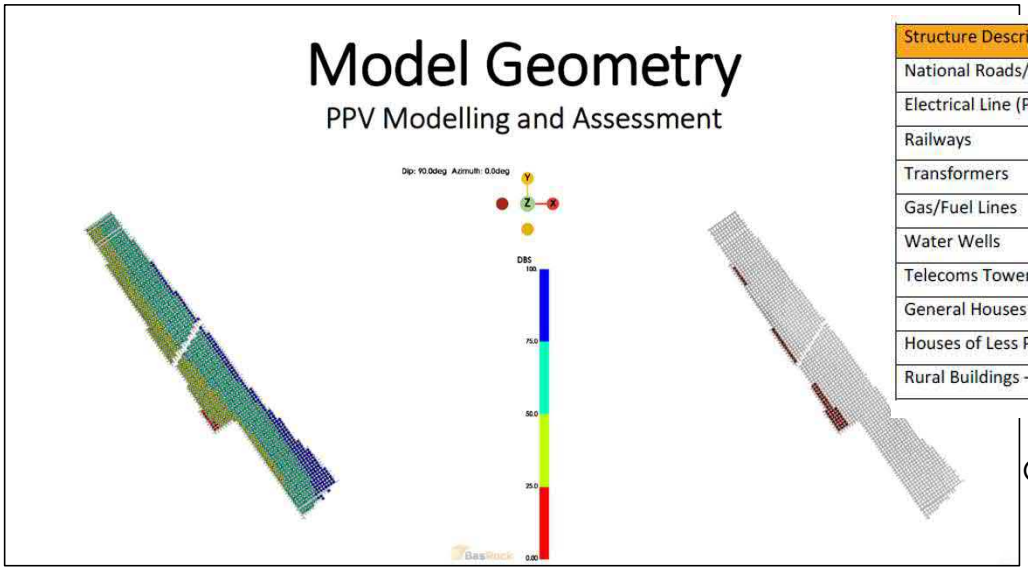
Numerical Modelling
Blast Vibration Maximum Expected PPV's

- Assumed a 38 mm diameter blast hole of varying length.
- Assumed an emulsion density of 1000kg/m3.
- Establish blasting advance limitations based on expected PPV and surface infrastructure proximity.
- Numerical model wire frames used to simulate blasts as proposed by analytical equations.
- Two zones delineated for 6mm/sec and 12.5 mm/sec to assess the zone of disturbance.
- Delays between shot holes to be more than 8 milliseconds





Numerical Modelling
Blast Vibration Modelling Assessment

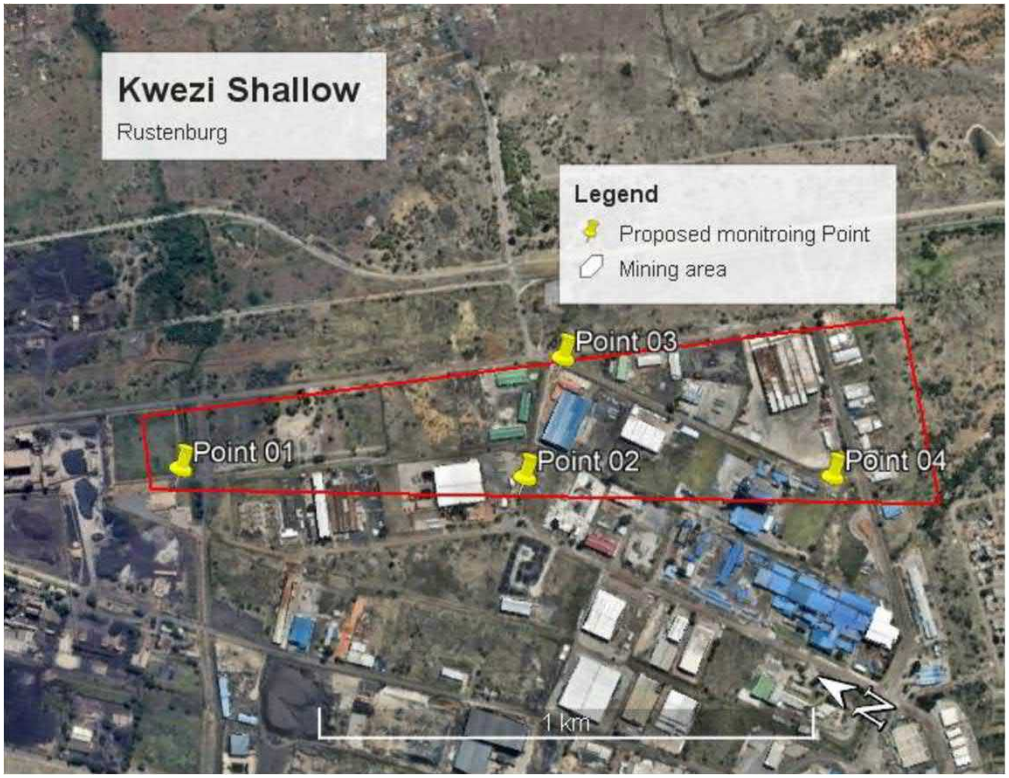


Structure Description	Ground Vibration Limit (mm/sec)
National Roads/Tar Roads	150
Electrical Line (Pylons)	75
Railways	150
Transformers	25
Gas/Fuel Lines	25
Water Wells	50
Telecoms Tower	50
General Houses of Proper Construction	25
Houses of Less Proper Construction	12.5
Rural Buildings – Mud Houses	6

Ground Vibration Limits as per USBM

Mitigation Measures– Blast and Vibration Monitoring

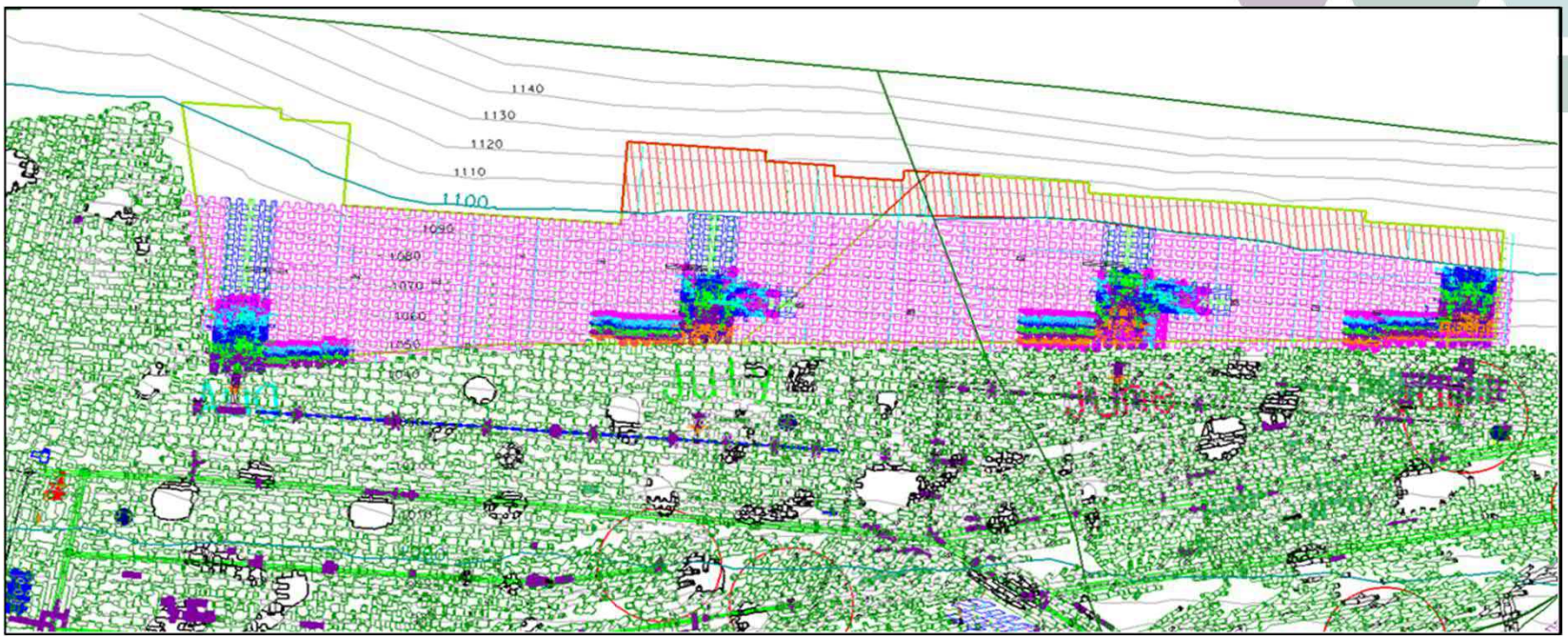
- The advance per blast to be limited to 2.0 m for depths < 50 m
- The advance per blast > 50 m can be 3.0 m
- Ground monitoring for ground movement and subsidence will be undertaken
- No mining shallower than 40m



Reduction of groundwater levels and stability of buildings

Marius van Biljon & Alan Olivier

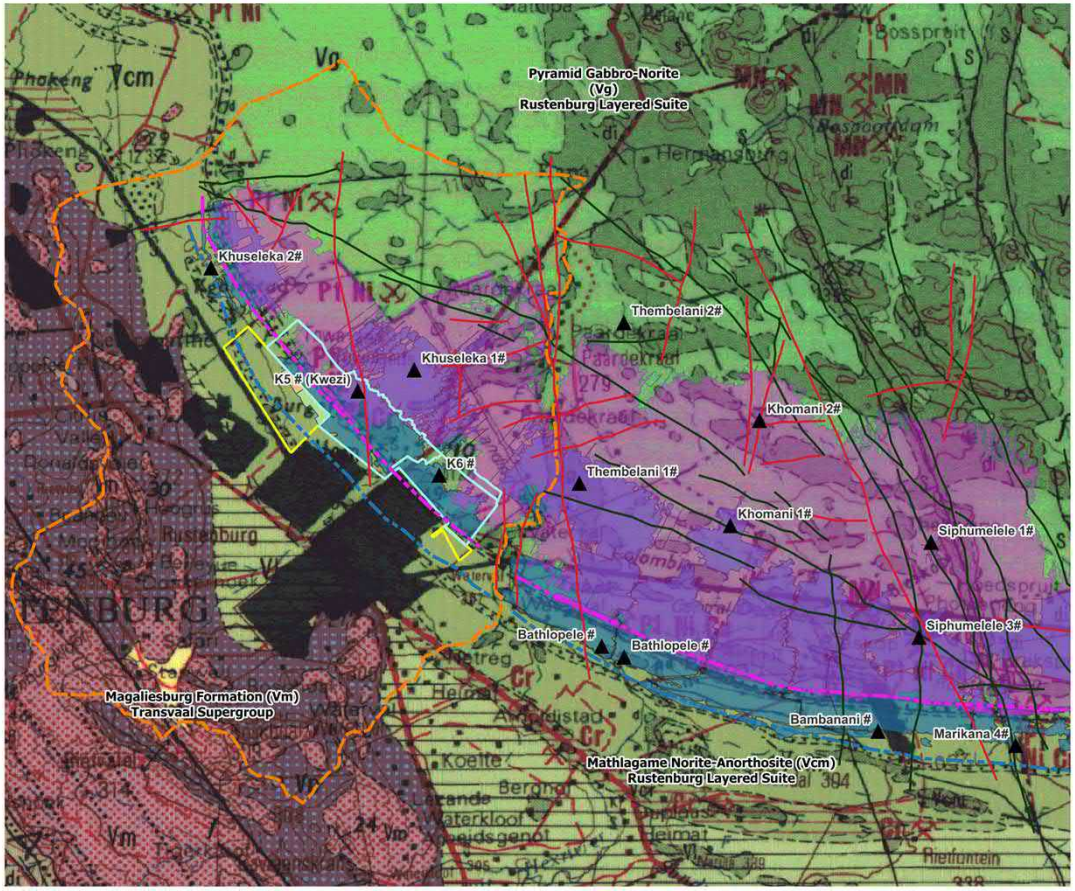
Mining Methodology



- No mining shallower than 40m –**Crown pillar is 40m below surface**
- Mining span: stable at 6m without support
- Pillar design 8m X 8m; resulting in very stable ground
- **Mining Design- Bord and pillar strike design**
- 8 mining development- convert to stoping upon completion
- 4 crews mining stoping

Groundwater Impact Assessment

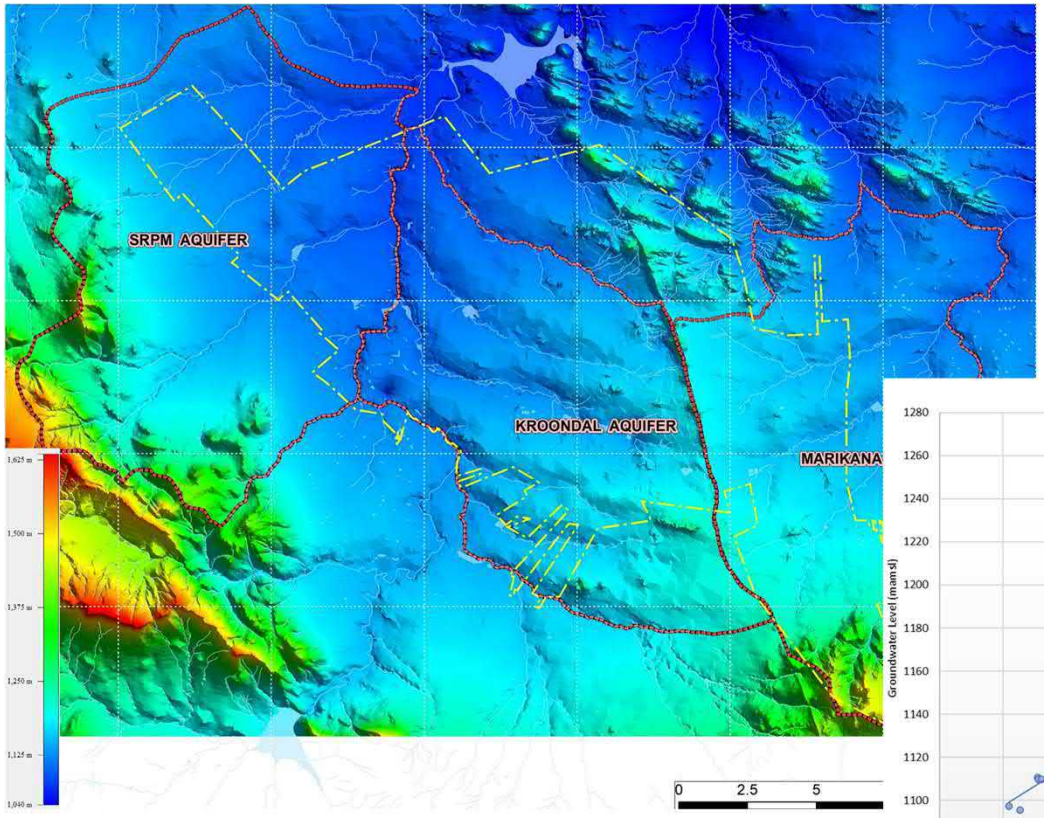
Aquifer Characterisation



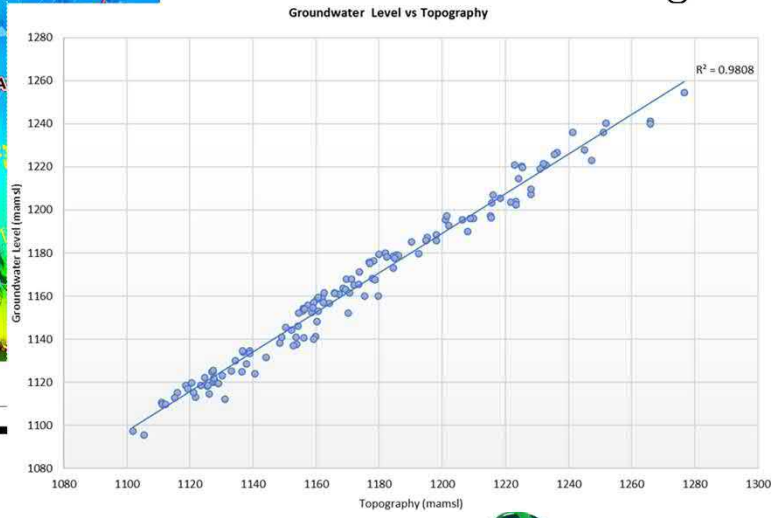
- The geology of the region is dominated by the layered rocks of the Bushveld Igneous Complex (norite)
- Secondary Fractured Aquifer.

Groundwater Impact Assessment

Prevailing groundwater conditions



- Groundwater mimics the topography.
- Groundwater flow is towards the surface streams.
- There is no evidence of aquifer dewatering into the current mine workings



Groundwater Impact Assessment

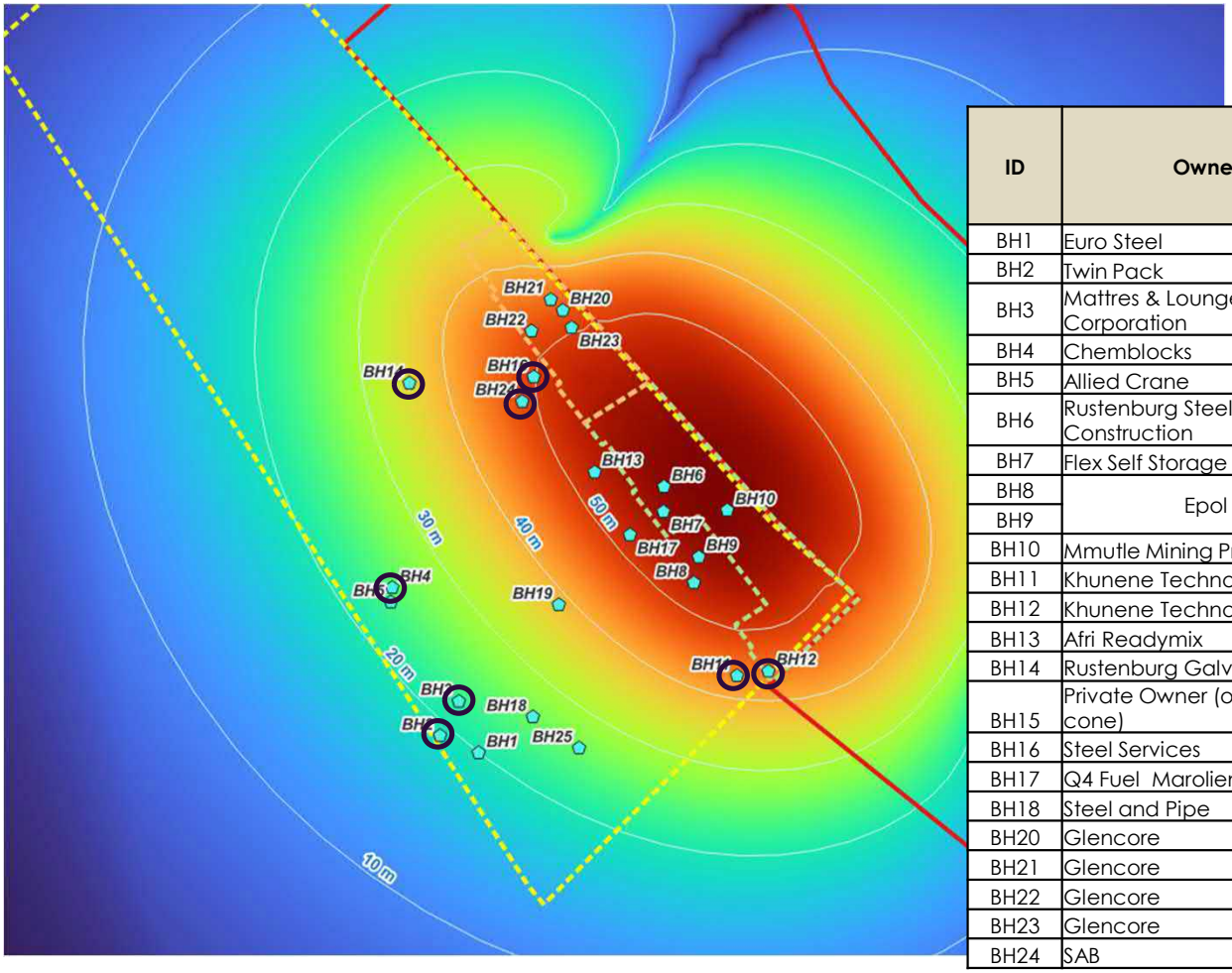
Hydrocensus



- Groundwater is used extensively
- 25 Private Boreholes identified

Groundwater Impact Assessment

Groundwater modelling and Risk Assessment



- Increase in High Risk Boreholes
- 9 Boreholes that are Low to No Risk

ID	Owner	Depth	DD	WL above / below EOH
BH1	Euro Steel	25	20	-9
BH2	Twin Pack	60	19	22
BH3	Mattres & Lounge Corporation	45	22	8
BH4	Chemblocks	45	24	3
BH5	Allied Crane	70	24	-6
BH6	Rustenburg Steel Construction	46	57	-25
BH7	Flex Self Storage	65	57	-3
BH8	Epol	25	54	-33
BH9		25	56	-41
BH10	Mmutle Mining Projects	40	58	-38
BH11	Khunene Technologies	80	43	22
BH12	Khunene Technologies	100	44	40
BH13	Afri Readymix	60	53	-3
BH14	Rustenburg Galvanisers	50	35	6
BH15	Private Owner (outside cone)	50	0	35
BH16	Steel Services	120	50	60
BH17	Q4 Fuel Marolien	45	52	-18
BH18	Steel and Pipe	20	26	-10
BH20	Glencore	30	47	-25
BH21	Glencore	30	45	-23
BH22	Glencore	30	48	-28
BH23	Glencore	30	49	-28
BH24	SAB	70	48	13

Groundwater Impact Assessment

Groundwater modelling and Risk Assessment



The following is important to note:

- BH 12 is 50m from existing mining.
- BH20 is 70m from existing mining.
- BH10 is 77m from existing mining.
- BH21 is 81m from existing mining.
- BH23 is 84m from existing mining.

None of the boreholes listed above show any indication of impact from the existing mining.

Groundwater Impact Assessment

Groundwater Quality

Groundwater Quality – Mine Monitoring Boreholes

Parameter	RPM WUL 2018	Drinking Water	NBH02	ATG05	ATG01
pH	6-9.5	≥5 to ≤9.7	8.07	7.93	7.25
Electrical Conductivity (EC)	<150	≤170	58	55.8	104
Total Dissolved Solids (TDS)		≤1 200	392	393	677
Alkalinity			208	181	506
Chloride (Cl)	<200	≤300	39	36	49
Sulphate (SO_4)	<200	≤500	45	44	0
Nitrate (NO_3-N)	<10	≤11	5.91	7.42	0.049
Ammonia (NH_4-N)		≤1.5	1	0.746	6.78
Orthophosphate (PO_4-P)			0.04	0.007	0.003
Fluoride (F)	<1	≤1.5	0.28	0.23	0.243
Calcium (Ca)	<150		37	38.1	92.3
Magnesium (Mg)	<100		30.6	32.9	23.1
Sodium (Na)	<200	≤200	36.5	42.3	102
Potassium (K)			0.85	0.699	41.1
Aluminium (Al)		≤0.3	<0.002	<0.002	<0.002
Iron (Fe)		≤2	<0.004	<0.004	<0.004
Manganese (Mn)		≤0.4	<0.001	0.002	0.519
Total Chromium (Cr)		≤0.05	<0.003	<0.003	<0.003
Hexavalent Chromium (Cr^{6+})			<0.002	<0.002	<0.002

- Water quality is good and not concerning

Groundwater Quality – Underground Mine Water

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	6-9.5	≥5 to ≤9.7	7.8
Total Dissolved Solids		≤1 200	740
Calcium	<150		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	<200	≤500	378
Chloride	<200	≤300	41
Nitrate	<10	≤11	0.2
Ammonium		≤1.5	<0.001
Aluminium		≤0.3	<0.001
Iron		≤2	<0.001
Manganese		≤0.4	<0.001
Nickel		≤0.07	0.001
Molybdenum			0.001

Groundwater Impact Assessment

Based on the field observations, at the study site and elsewhere, it is concluded that the groundwater model is over-conservative and unlikely to reflect the true impact. However, it is not completely ignored, and mitigation measures and monitoring of the groundwater levels are recommended.

Mitigation Measures

1. Leaving pillars around the boreholes that were drilled beyond the mining depth
2. Prevent or reduce the inflow of groundwater into the mine (grouting)
3. Replace damaged / dewatered boreholes (Some boreholes could be drilled deeper)
4. Alternative water source (wellfield)
5. Establishment of an environmental monitoring committee

Groundwater Impact Assessment



Monitoring

The groundwater level monitoring will act as an early warning to possible impact, at which point Sibanye-Stillwater can do the following:

- Drill the existing borehole deeper.
- Drill new borehole/s in unaffected area/s.
- Supply water from an alternate source.

Summary of mitigation and monitoring plan

ASPECT	ISSUE/RISK	MITIGATION ACTION PLAN	MONITORING ACTION PLAN	REPORTING
Groundwater	▪ Lowering of the water table impacting on surrounding boreholes ▪ Groundwater contamination resulting in poor borehole water quality	▪ Seal and grout the mine and ensure water does not flow into mine workings ▪ Leave pillars around the boreholes to protect the boreholes ▪ Replace affected boreholes ▪ Investigate water supply alternatives	o Sibanye-Stillwater to drill 5 boreholes to monitor water levels to ensure management actions should levels drop. o Water levels to be monitored monthly for the first 2 years and quarterly after the first 2 years. o Water quality to be monitored quarterly in all the identified boreholes	Monitoring Committee meetings
Blast and Vibration	▪ High vibration levels affecting structural integrity	▪ Follow recommended pillar and geometry mining span guidelines ▪ Follow recommended support guidelines ▪ Ensure vibration levels do not exceed guideline limits and achieve maximum vibration levels of 6 mm/s ▪ Limit the length of round to 2.0m max at depths less than 50 m. ▪ Employ 8mm delay between shotholes.	o Conduct house surveys to establish the baseline o Install continuous monitors in four points around the relevant areas o Monitor vibration levels continuously and measure monthly	Monitoring Committee meetings
Surface Subsidence	▪ Subsidence due to underground mining affecting structural integrity	▪ Follow recommended pillar and geometry mining span guidelines ▪ Follow recommended support guidelines	o Install surface subsidence monitoring stations and continually monitor for surface subsidence.	Monitoring committee meetings.

END

Thank you

Minutes

Sibanye Stillwater	
12 December 2024	

Meeting Details: **Project: The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Right Operations through the Inclusion of the UG Shallow Blocks** **Feedback Meeting with Epol**		
Date: 12 December 2024	Time: 11:00	Place: Teams
Meeting called	Sibanye Stillwater	
Type of meeting	Focus Group Meeting	
Facilitator	Phillip Ramphisa	
Note taker	Kirthi Peramaul	
Attendees	**Alta van Dyk Environmental Consultants Pty Ltd (AvDE)** Kirthi Peramaul (KP) **Independent Specialists** Marious van Biljon (MB) **Epol** Johan Bolz Gugu Manyathi Pramarshen Perumal Loren Laker **Sibanye Stillwater (SS)** Cor Dednam (CD) Phillip Rampisha (PR) Lesego Mokgethi (LM) Jacques Gouws (JG) Stephan Botes (SB) Kahmani Gounden (KG) Lukas Kekana (LK) Bez Bezuidenhout (BB) Sbusiso Msomi (SM) Alan Olivier (AO) Sbusiso Msomi (SM) Clarence Mutsvanga (CM)	
Apologies	None	
Presentation		
The SS team gave a presentation regarding the findings of the specialist studies. Please refer to Appendix A for a copy of the presentation.		
Discussion		

A summary of the discussion undertaken is provided below.

- SS undertook an ESG moment.
- SS indicated that the purpose of the meeting was to discuss the concerns around the Kwezi projects. The comments and concerns that have been submitted by Epol has been acknowledged by the project team. Epol is able to reiterate their comments in this platform in order for the project team to discuss the comments.
- Epol advised that from the agenda it is noted that SS will hopefully want to reach a consensus. But obviously this would be unpacked once the presentation has been undertaken.
- Epol reiterated the following comments:
    - Required background on the project
    - Epol understands that the application is for the Mining Right, however Epol does not fall within the proposed mining blocks but within the greater area. How does this greater mining right area affect Epol.
    - Explanation of the process being undertaken
    - Concerning that the mining is 40m below surface, the weight of the building on the small footprint as the building is 12m below surface.
- AvDE advised that the process is undertaken in terms of the NEMA EIA Regulations, hence a Basic Assessment Process is being undertaken for the expansion of the Mining Right with mining in only Blocks A and B. As part of EIA Regulations, one of the regulatory requirements is that Public Participation is being undertaken. Epol was consulted regarding the proposed expansion and details on the availability of the Draft Basic Assessment Report has been provided. The 30-day comment period commenced on the 14 November 2023 and ends on the 13 December 2023. Subsequent to the 30-day comment period, AvDE will consolidate all comments for submission with the Final Basic Assessment Report to the DMPR for decision making.
- SS added that after the report is submitted, the regulators will look at the project, the mitigation measures proposed and make a decision on the project.
- Epol indicated if there is room for extension.
- SS added that as a company SS is open to comments and the EIA process is not the end. SS is trying to stick to the regulatory timeframe. However, SS is committed to discuss comments.
- AvDE advised that the 30-day comment period cannot be extended as these are legislated timeframes however since the meeting was only held today (12 December) there can be time awarded to respond on the action items, discussions from this meeting. There is no need for an additional request and the additional time to respond in terms of the additional time and we can confirm in terms of this call. The agreed date was 8 January 2024.
- SS advised that a presentation has been prepared so there is an understanding of the mitigation measures to be applied.

Presentation by AO on stability and vibration. A summary of the presentation:

- Numerical Modelling was undertaken to determine how SS was going to extract Blocks A and B and what the pillar stability will be, and the impact of blast and vibration
- Employ and board and pillar method. Approximately 25% will remain to maintain stability. Total extraction is approximately 75%.
- Already mined areas were shown in the presentation which is very close to the Epol infrastructure and mining was done at a depth of 30m. No issues with surface subsidence.
- For each pillar all come out as a low-risk category. The likelihood of having a total pillar collapse is unlikely. It is a shallow environment and high factors of safety.
- In terms of the vertical displacement of the already mined block the max vertical displacement will be in the center of the mining block. The vertical displacement at the already mined block is around 4mm.
- Max vertical displacement on surface <0.5mm. Mining will not be closer than 40m
- Undermining Epol will not be undertaken, max closures on the underground environment are 2.5mm. No high closures around the Epol infrastructure are expected.
- A blasting advance limitation needs to be imposed. Reduce the face advance to 2m will be imposed that will be applicable to all depths below <50m.

- Based on the USBM limits. E.g. mud houses will experience damage from 6mm/sec. The results indicated that the PPV will not be exceeded.
- Surface subsidence monitors will be installed
- Epol enquired if there are any plans to mine under the building:
- SS advised that at this stage no, the application for mining is only for blocks A and B. The entire Prospecting Right Area has been included/converted hence the greater area on the application. If mining is planned at a later stage, then another environmental process will be required. Opencast will be more applicable due to the outcrop. This is not on the plans currently. This will also warrant the amendment of the mine works program as there is no planning for this area.
- Epol enquired if there is a possibility that their operations be excluded from the application.
  - SS advised that a Section 102 application has already been submitted and at this stage it would not be able to retract the application.
- Epol enquired if the basement of the Epol factory was considered.
  - SS advised that Epol is outside of the mining areas of Blocks A and B and no mining will therefore be conducted below Epol according to the current mining works program.

Presentation by MB on Groundwater. A summary of the presentation:

- Marius went through the geology of the region and indicated that this type of geological formation is not characterized by good aquifer development but that does not mean there will be high yielding boreholes.
- The regional groundwater model was should. There is a 98% correlation between groundwater and surface water. Because good correlation exists there is no evidence of dewatering taking place. The mine currently did not intersect significant faults, and this is proven by the dewatering volumes.
- The aquifer above the mine workings is intact, however the mining for Block A and B is abit shallower.
- Hydrocensus undertaken, Epol is BH8 and BH9. Outside but relatively close to the mining block.
- Numerical modeling done, showing the area overlying the proposed workings will have a drawdown and extend approximately 1km. Possibility of a drop in several boreholes. The model is however a tool and not the be all and end all of an investigation. Available info was used and calibrated into the info. The model was calibrated with 150 boreholes. Site specific data is being collected and will give site-specific information to refine the model. The mode is meant to be updated as the model can be over conservative, but at the same time be aware of possible impacts that can arise. A drop in the water level will not happen overnight but will take time.
- Borehole 12 is 50m away and borehole shows no impact from the mining operations. No evidence of water seeping into the mine. The Hex river has already been mined with no evidence of seepage.
  - Epol advised that they will comment on the current assessments and present the current findings to their business. They are a food operation and completely different from mining, hence Epol needs to understand the impact on their operation.
  - SS confirmed that the model will be updated in due course, hence the need for the monitoring committee whereby such findings will be presented. Ongoing monitoring will be undertaken.
  - Epol confirmed that they will comment on pre-application and not post application.
  - Epol enquired if there is any guarantee that SS will not mining under their plant
  - SS advised that from the meeting there is a guarantee, but SS can also put it in writing.

The action items were as follows:

- Epol will provide their comments by the 8 January 2028
- AvDE to share the presentation with Epol.
- SS to provide Epol with a letter confirming that mining will not be undertaken below Epol.

The meeting was adjourned at 12:20

EURO Sales

Minutes

Sibanye Stillwater	
12 December 2024	

Meeting Details:
Project: The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Right Operations through the Inclusion of the UG Shallow Blocks

Date: 12 December 2024	Time: 09:00	Place: Teams

Meeting called	Sibanye Stillwater
Type of meeting	Focus Group Meeting
Facilitator	Kirthi Peramaul
Note taker	Tehya Henry
Attendees	**Alta van Dyk Environmental Consultants Pty Ltd (AvDE)** Kirthi Peramaul (KP) Tehya Henry (TH) **Independent Specialists** Marious van Biljon (MB) **Euro Sales Pty Ltd (ES)** Ansa Euler (AE) Henrick Eckaard le Roux (ER) **Sibanye Stillwater (SS)** Cor Dednam (CD) Phillip Rampisha (PR) Lesego Mokgethi (LM) Jacques Gouws (JG) Stephan Botes (SB) Kahmani Gounden (KG) Charmaine Young (CY) Lukas Kekana (LK) Bez Bezuidenhout (BB) Sbusiso Msomi (SM) Alan Olivier (AO)
Apologies	Cornell Strydom

Presentation

The SS team gave a presentation regarding the findings of the specialist studies. Please refer to Appendix A for a copy of the presentation.

Discussion

- **ER** wrote a letter (dated 5 December 2024) on behalf of **ES**, expressing concerns over the possible impacts on the company created by the proposed Kwezi expansion project, as well as asking what assurances will be proposed to the affected property owners.
- Subsequent to the issuance of the letter, SS requested a focus group meeting. During this meeting, **ER** noted that the SS team had determined that the proposed mining activity would not have detrimental impacts on the ES factory building or borehole (BH1), despite the indication of the specialist reports, especially the Geohydrological Impact Assessment regarding impacts to groundwater.
- **ER** sought clarification of the purpose of this meeting, as called by SS, as the period of public participation in which comments or objections are submitted closes on 13/12/2024.
    - **PR** clarified that based on all previous communication, the purpose of the meeting is to engage in a more detailed and conclusive discussion between SS and **ES** with the relevant specialists present to address specific technical concerns.
- **AO** gave an explanation of the Vibration, Blast and Stability Assessment undertaken, stating that some blasting and mining within the existing Kwei operation has occurred to a depth of 30m, and to date in these areas, there have been no incidents of pillar failure or subsidence.
- **AO** also noted that the proposed activities will not exceed the standards for blasting vibrations.
    - **ER** stated that the report is understood by ES.
    - **ER** noted that within the report, possible impacts and related mitigation/control measures have been indicated. ER recognized that if face advances are kept between 2-3m, possible impacts are minimal.
    - **ER** also noted that SS has not issued written confirmation of what recommended measures will be implemented or a plan, should mitigation measures be inadequate or insufficiently implemented.
    - **ER** stated that ES's insurance provider has indicated that no coverage from loss or damages incurred as a result of mining activity will be provided to the company.
    - **ER** asked SS what assurance can be provided to ES to navigate the loss of insurance coverage as a direct result of the proposed mining expansion project.
    - **ER** stated the main aim of engagement with SS is to gain assurance
        - **PR** acknowledged ER and ES's understanding of the report and appreciated the clear communication of what ES is seeking.
- **PR** opened the floor for the SS team to respond to ER's statements and questions
    - **LK** responded regarding the confirmation of which recommended mitigation measures are to be implemented on site are subject to the approval of the Department of Mineral and Petroleum Resources, to whom the application is submitted
    - **LK** further explained that the approval of the mitigation measures will warrant the issuance of conditions, which will be audited annually both internally and externally to eliminate bias.
        - **ER** responded that the approval process has been understood.
        - **ER** noted that assuming the approval of the application, the conditions are known within the relationship between SS and the Department.
        - **ER** further stated that while recommended mitigation measures are known to the public through the Basic Assessment Report developed by AvDE, not all stakeholders are made aware of the accepted mitigation measures to be implemented. **ER** expressed that only providing recommended measures is insufficient information for ES to accept the project without objection.
        - **PR** responded SS has discussed mitigation measures at length internally, concluding that a monitoring committee will be formed within the SS project team in order to close the gap between recommendations and implementations. PR stated that the monitoring committee will regularly report on occurrences and actual resulting impacts e.g., the occurrence of blasting, the expected impacts and the actual impacts experienced.
- **PR** asked ER for thoughts regarding the monitoring committee

    - **ER** could not state his position on an internal committee.
    - **ER** stated ES would like assurance that the approved mitigation measures will be applied.
- **PR** asked for the insurance schedule held by ES to be shared with SS so the relevant people can assess and address the issue.
    - **ER** confirmed the insurance schedule will be shared with SS.
    - **JG** indicated he can receive the insurance schedule.
- **ER** expressed concern that the specialist could be incorrect in their determination of scenarios and outcomes, or that the mine could be negligent in their application of mitigation measures. **ER** emphasized that under these scenarios, it is possible for ES to be subjected to consequences of the mining activity.
- **ER** asked that SS provide assurances to ES, should ES suffer from loss or damages as a result of the mining activities. **ER** noted that SS should be able to provide assurance readily if the risks to ES's property are as minimal as stated by SS.
    - **LM** responded that written assurance that SS will apply the approved mitigation measures can be provided to ES. **LM** explained that SS would be at risk should the company fail to the mitigation measures as stipulated by the specialist reports and the Monitoring and Management Plan.
- **ER** wanted to make it clear regarding the matter of insurance that the broker or company that ES utilizes is subject to change, however, the principal remains the same; due to the mining activity, ES is unlikely to receive coverage for loss or damages as a result. **ER** asked that ES receive coverage from SS for the replacement value of any damages incurred to the property as a result of SS's mining activity.
    - **PR** summarized that a written assurance letter on this matter is proposed. PR restated that through the monitoring committee, environmental aspects will be constantly monitored.
    - **PR** asked if this outcome is sufficient for ES.
        - **ER** confirmed the outcome addressed one of the concerns of ES.
- **ER** wanted to make the importance of ES's borehole explicitly clear, stating that the company is solely reliant on the borehole to supply water to their factory and to various tenants on the property. **ER** stated that any damages to the borehole or impact to the water table could lead to a loss of water supply to ES, resulting in the factory being forced to relocate or close down.
- **ER** stated that the water table may take years to recover to its level prior to mining activities. **ER** made reference to the Basic Assessment Report Appendix C4, in which the groundwater assessment indicates the groundwater level will recover at the earliest within 10-15 years post-closure.
- **ER** stated the understanding of the model (Figure 7.3), in which the groundwater level will only recover approximately 50 years post closure, is based on the worst-case scenario where no mitigation measures are applied.
    - **ER** reinforced the need for SS to provide assurance that mitigation measures will be implemented, and that SS will be able to assist ES with possible loss or damages in the future.
- **PR** asked if such a commitment can be made.
    - **LM** confirmed that in the event of a catastrophe, SS will be able to assist ES.
    - **CD** statement agreement with LM.
        - **PR** confirmed an assurance letter will be issued after the insurance schedule has been received and assessed.
- **ER** sought clarity on what ES should do in the interim of the assurance letter being issued, as if to proceed with the lodging of a formal objection before the comment period closes or if it is no longer necessary.
    - **PR** stated that at this stage, SS and ES have been engaging in good faith, and SS cannot advise a stakeholder on their right to object or not.
    - **LK** noted all public engagements intend to foster SS's relationship with stakeholders and interested and affected parties. LK also noted that all stakeholder comments received, inclusive of this meeting, will be included in the final Basic Assessment Report submitted.
    - **LK** stated that the monitoring team will, in the future be multidisciplinary and able to streamline communication and information dissemination to interested and affected parties.

    - **LK** further stated that should issues arise and be detected by the monitoring team, an investigation will be conducted.
- **PR** asked if an explanation of the groundwater report was required, as ER indicated full understanding.
    - **ER** indicated a brief explanation can be given
- **MvB** noted that a primary source of concern within the groundwater report is the model indicating the water level drawdown over time. **MvB** wanted ES to understand that the modelling system is a tool and approximation of the real world. **MvB** stated the model was generated utilizing information from present-day data.
- **MvB** acknowledged the dire outcome of the model under the worst-case scenario. **MvB** further explained that while the model must not be ignored, the real-world scenario must be considered.
    - **MvB** stated that BH12 (indicated in Appendix C4) is situated approximately 50m from the existing mining operation and has not been affected at all. Additionally, along the UG2 Reef, SS has operations shallower than the proposed Kwezi expansion, and no incidences of groundwater seepage or seepages into the mine have occurred.
- **MvB** stated that he does not believe the real-world implications on the groundwater level will be as drastic as the model suggested.
- **MvB** further stated that as BH1 is further away from the mining area, he is confident that ES's borehole will not be at risk.
- **MvB** noted that the simulated models will be continually updated based on data received from continual monitoring, and will indicate possible issues before their fruition.
- **MvB** acknowledged the importance of models but noted that should impacts occur, there are remedial options listed in the report and in a letter to address ES's concerns
- **MvB** further noted as the mine will be plugged during rehabilitation, decant is not expected to be a future issue.
- Regarding the water quality **MvB** acknowledged the quality of water will change but will not be drastic or significant enough to be considered as an issue.
- **PR** thank MvB for his comprehensive input

The meeting was adjourned at 10:00

Minutes

Sibanye Stillwater	
04 December 2024	

Meeting Details: **Project: The Proposed Amendment of Mining Right 80 MR for the Expansion of the Kwezi Mining Right Operations through the Inclusion of the UG Shallow Blocks**			
Date: 04 December 2024		Time: 11:00	Place: Teams
Meeting called	Alta van Dyk Environmental Consultants		
Type of meeting	Focus Group Meeting		
Facilitator	Kirthi Peramaul		
Note taker	Kirthi Peramaul and Tehya Henry		
Attendees	**Alta van Dyk Environmental Consultants Pty Ltd (AvDE)** Kirthi Peramaul (KP) Tehya Henry (TH) Alta van Dyk (AvD) **Euro Sales Pty Ltd (ES)** Ansa Euler (AE) Henrick Le Roux Eckaard (LRE) **Sibanye Stillwater (SS)** Yolande Janse van Rensburg (YJvR) Bonginkosi Ngqulunga (BN) Cor Dednam (CD) Phillip Rampisha (PR) Lesego Mokgethi (LM) Jacques Gouws (JG) Christi Lategan (CL) Stephan Botes (SB) Kahmani Gounden (KG) Karabo Masilo (KM) Mahowa Morotoba (MM) Charmaine Young (CY)		
Apologies	-		
Presentation			
A presentation was given by the SS team, including the purpose of the meeting, the background to the Kwezi Operations Project, the proposed expansion, and the findings of the specialist studies. Please refer to Appendix A for a copy of the presentation.			
Discussion			

- **LRE** wanted to understand how SS has determined the possible impact on Euro Sales' borehole (BH1) as negligible, as Euro Sales is located within the 1km radius identified as the potentially impacted zone by the Geohydrological Impact Assessment (page 50).
- **LRE** expressed concern that the Geohydrological Report determined the water level will drop by ~ 9 m below the depth of BH1 and may remain dry post-closure of the Kwezi Operation (reference made to pages 52-54, and Table 7.1).
    - **LRE** sought clarification as to how the mitigation and rehabilitation measures will protect BH1 against this scenario.
    - **LRE** also highlighted the potential deterioration of the water quality as a result of the proposed mining operations, as many of the ES tenants are reliant on potable water from BH1 (reference made to page 57).
- **LRE** asked how the mine intends to apply mitigation measures as suggested within the Draft Basic Assessment Report and the Geohydrological Impact Assessments,
    - **PR** noted that boreholes within the 1km radius of the proposed mining area may be considered to receive an alternative water supply. **PR** stated that approved mitigation measures will be applied and monitored by a dedicated monitoring network to ensure compliance.
- **LRE** sought clarification as to how the mine intends to ensure rehabilitation efforts post-closure.
    - **BN** noted that SS has guaranteed funding for the future rehabilitation of the mine.
- **LRE** requested that the Monitoring Management Plan be shared with the landowners, specifically in relation to water and blasting impact management, as it was previously mentioned in a Focus Group Meeting facilitated by AvDE.
    - **BN** noted this request**.**
- **LRE** asked what assurance will be provided to the affected landowners, in the event that the approved mitigation measures fail.
    - **BN** noted mitigation measures are already in place within the existing Kwezi operations, and suggested an additional meeting to address the specifics of monitoring.

The meeting was adjourned

Action Items	**Person Responsible**	**Deadline**

Kroondal Operations Proprietary Limited
Registration No. 2000/000341/07

Registered Address:
Libanon Business Park
1 Hospital Street | (Off Cedar Ave)
Libanon | Westonaria | 1780

Business Address:
Hex River Complex
Old Mine Road
Rustenburg | 0299

Postal Address:
PO Box 624 |Kroondal | 0350

Tel: +27 14 536 4000

To: DupWest Inc.

20 December 2024

Email: melissa@dupwest.co.za

For Attention: Mr P.P. van der Westhuizen

Dear Mr van der Westhuizen,

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. To clarify, under the scope of the current EA application, no mining activities will take place outside the defined boundaries of Blocks A and B.

The risk mitigation efforts are guided by our commitment to protect the environment and the wellbeing of stakeholders in areas within which we operate as per our Environmental, Social and Governance (ESG) policy. SRPM have undertaken specialist investigations pertaining to the project to ensure that project impacts are avoided and minimised. To this effect:

- SRPM undertakes to ensure that the dewatering of the aquifer is minimised and that borehole water availability is not impacted by the project by sealing any water intersections during mining. To monitor the groundwater related impacts of the project, SRPM will place five (5) monitoring boreholes around the project area , as per the specialist study recommendations, to continuously track ground water levels and ground water quality. SRPM undertakes to provide an alternative water supply for directly affected water boreholes should any impacts occur because of the Kwezi Shallows mining activities, subject to scientific investigations.
- SRPM will place four (4) continuous blast monitors across the mine project area to monitor air blast and vibration. We commit to ensure that the USBM standard guideline limits of minimum 6 mm/s and maximum 25mm/s are not exceeded during project activities.
- SRPM commits to follow the recommended pillar and geometry mining span guidelines to avoid any subsidence due to underground mining. In addition, SRPM will install surface subsidence monitoring stations to measure and monitor subsidence.

SRPM commits to remain true to the values of Sibanye Stillwater by extending due care ensuring that the environment and stakeholders are not worse off due to mining activities. However, should you experience negative effects due to the project, SRPM will engage in a consultative process to identify root causes, corrective actions, and amicable solutions.

SRPM is also proposing to set an independent monitoring committee up to ensure that the Kwezi Shallows project activities are monitored and reported to you and all other interested and affected parties.

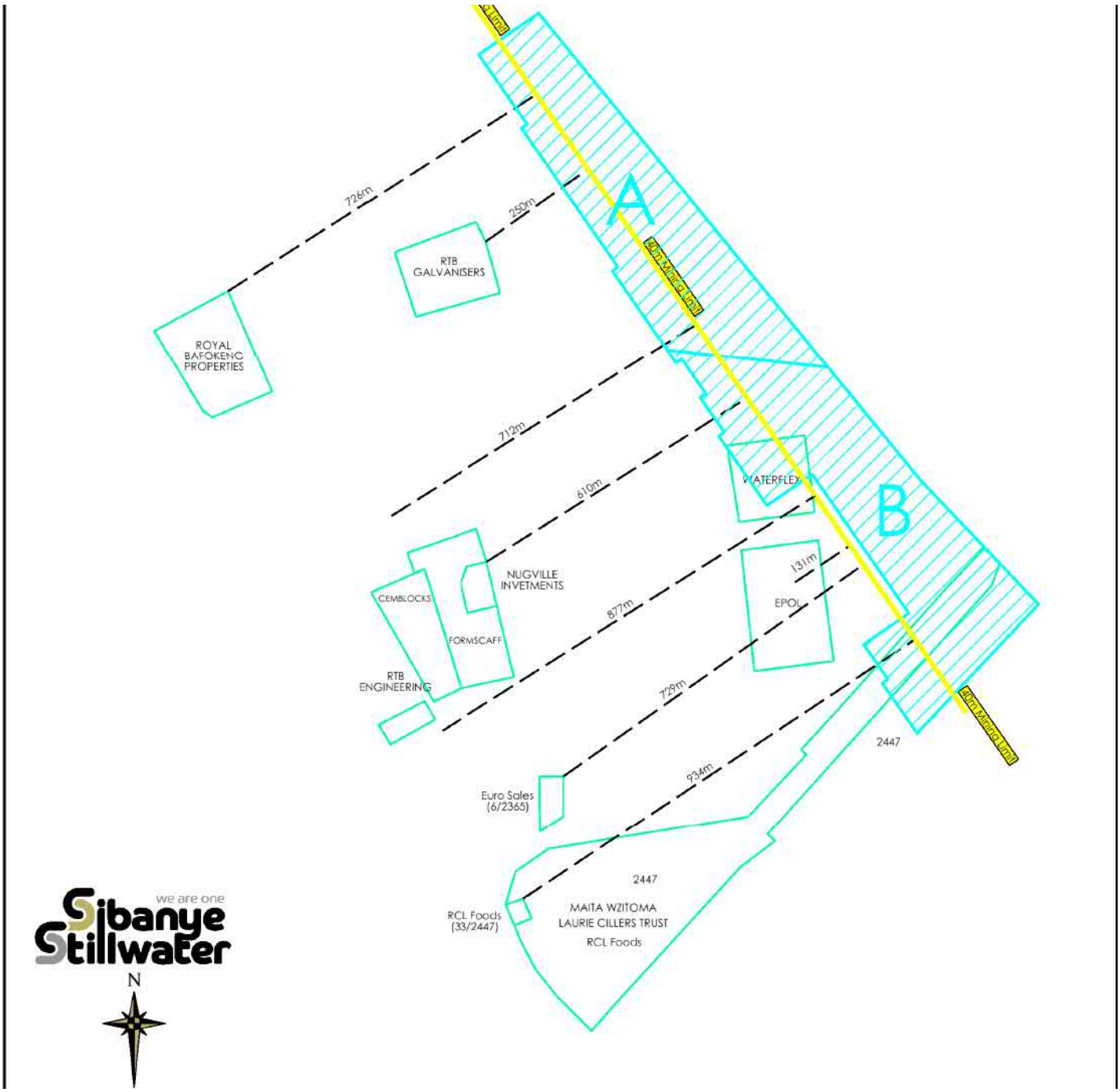
We trust that this letter satisfies your concerns and requirement. Please feel free to contact our project team should you have further concerns and enquires (jacques.gouws@sibanyestillwater.com).

Yours sincerely,

Signed by:Bonginkosi Richman Ngqulun
Signed at:2024-12-19 13:58:23 +02:00
Reason:I approve this document

19/12/24

Bonginkosi Ngqulunga
SVP Mining SA PGM Kroondal • Mining Operations


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PROPERTIES
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Registration No. 2000/000341/07

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Libanon | Westonaria | 1780

Business Address:
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Old Mine Road
Rustenburg | 0299

Postal Address:
PO Box 624 |Kroondal | 0350

Tel: +27 14 536 4000

To: Epol

20 December 2024

Email: loren.laker@epol.com

For Attention: Loren Laker

Dear Loren,

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. To clarify, under the scope of the current EA application, no mining activities will take place outside the defined boundaries of Blocks A and B.

The risk mitigation efforts are guided by our commitment to protect the environment and the wellbeing of stakeholders in areas within which we operate as per our Environmental, Social and Governance (ESG) policy. SRPM have undertaken specialist investigations pertaining to the project to ensure that project impacts are avoided and minimised. To this effect:

- SRPM undertakes to ensure that the dewatering of the aquifer is minimised and that borehole water availability is not impacted by the project by sealing any water intersections during mining. To monitor the groundwater related impacts of the project, SRPM will place five (5) monitoring boreholes around the project area , as per the specialist study recommendations, to continuously track ground water levels and ground water quality. SRPM undertakes to provide an alternative water supply for directly affected water boreholes should any impacts occur because of the Kwezi Shallows mining activities, subject to scientific investigations.
- SRPM will place four (4) continuous blast monitors across the mine project area to monitor air blast and vibration. We commit to ensure that the USBM standard guideline limits of minimum 6 mm/s and maximum 25mm/s are not exceeded during project activities.
- SRPM commits to follow the recommended pillar and geometry mining span guidelines to avoid any subsidence due to underground mining. In addition, SRPM will install surface subsidence monitoring stations to measure and monitor subsidence.

SRPM commits to remain true to the values of Sibanye Stillwater by extending due care ensuring that the environment and stakeholders are not worse off due to mining activities. However, should you experience negative effects due to the project, SRPM will engage in a consultative process to identify root causes, corrective actions, and amicable solutions. SRPM is also proposing to set an independent monitoring committee up to ensure that the Kwezi Shallows project activities are monitored and reported to you and all other interested and affected parties.

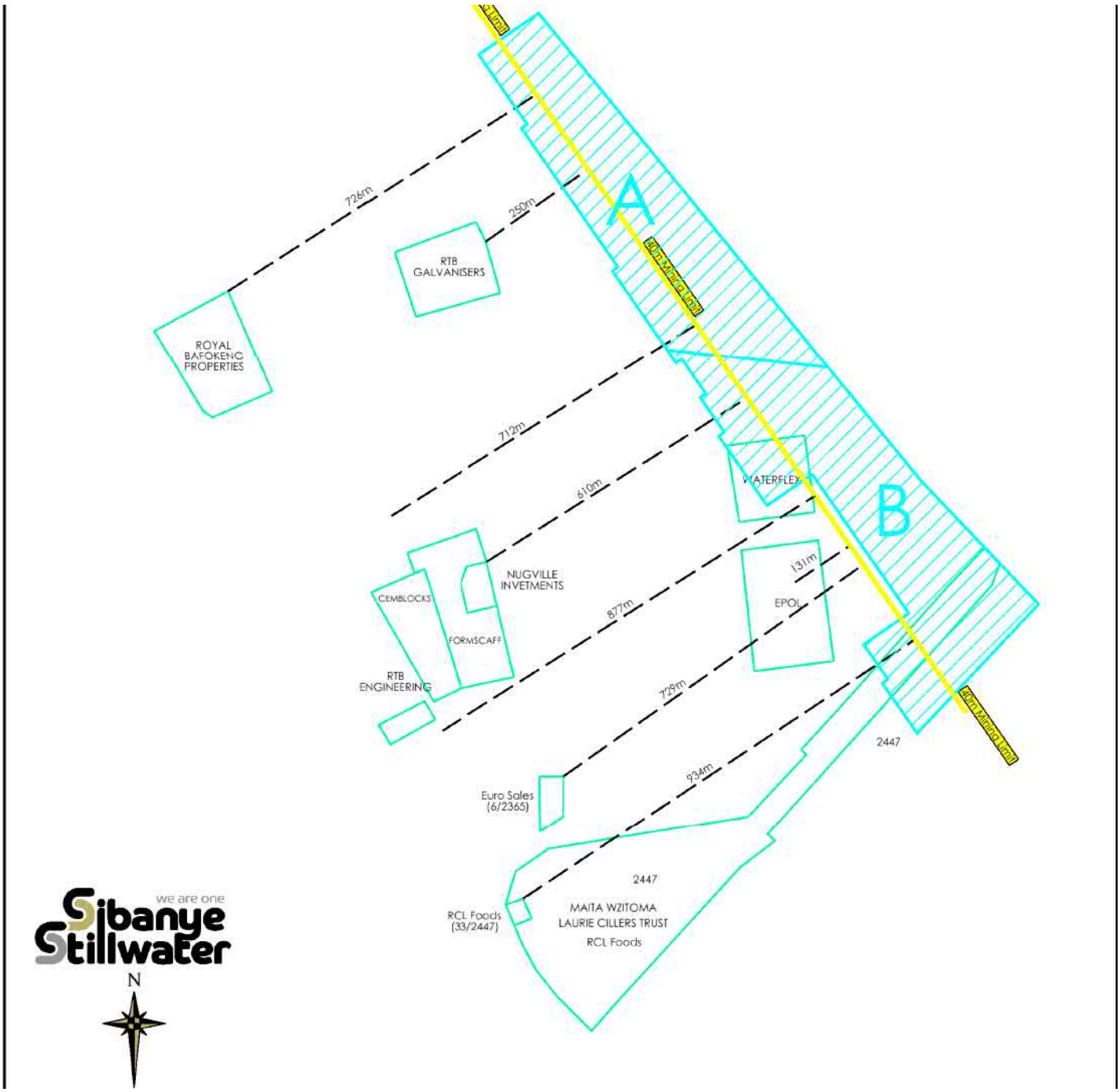
We trust that this letter satisfies your concerns and requirement. Please feel free to contact our project team should you have further concerns and enquires (jacques.gouws@sibanyestillwater.com).

Yours sincerely,

Signed by:Bonginkosi Richman Ngqulun
Signed at:2024-12-19 13:58:22 +02:00
Reason:I approve this document

19/12/24

Bonginkosi Ngqulunga
SVP Mining SA PGM Kroondal • Mining Operations


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Rustenburg | 0299

Postal Address:
PO Box 624 |Kroondal | 0350

Tel: +27 14 536 4000

To: Le Roux, Eckaard Attorneys

20 December 2024

Email: eckaard@summitlaw.co.za

For Attention: Eckaard le Roux

Dear Eckaard,

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

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The risk mitigation efforts are guided by our commitment to protect the environment and the wellbeing of stakeholders in areas within which we operate as per our Environmental, Social and Governance (ESG) policy. SRPM have undertaken specialist investigations pertaining to the project to ensure that project impacts are avoided and minimised. To this effect:

- SRPM undertakes to ensure that the dewatering of the aquifer is minimised and that borehole water availability is not impacted by the project by sealing any water intersections during mining. To monitor the groundwater related impacts of the project, SRPM will place five (5) monitoring boreholes around the project area , as per the specialist study recommendations, to continuously track ground water levels and ground water quality. SRPM undertakes to provide an alternative water supply for directly affected water boreholes should any impacts occur because of the Kwezi Shallows mining activities, subject to scientific investigations.
- SRPM will place four (4) continuous blast monitors across the mine project area to monitor air blast and vibration. We commit to ensure that the USBM standard guideline limits of minimum 6 mm/s and maximum 25mm/s are not exceeded during project activities.
- SRPM commits to follow the recommended pillar and geometry mining span guidelines to avoid any subsidence due to underground mining. In addition, SRPM will install surface subsidence monitoring stations to measure and monitor subsidence.

SRPM commits to remain true to the values of Sibanye Stillwater by extending due care ensuring that the environment and stakeholders are not worse off due to mining activities. However, should you experience negative effects due to the project, SRPM will engage in a consultative process to identify root causes, corrective actions, and amicable solutions.

SRPM is also proposing to set an independent monitoring committee up to ensure that the Kwezi Shallows project activities are monitored and reported to you and all other interested and affected parties.

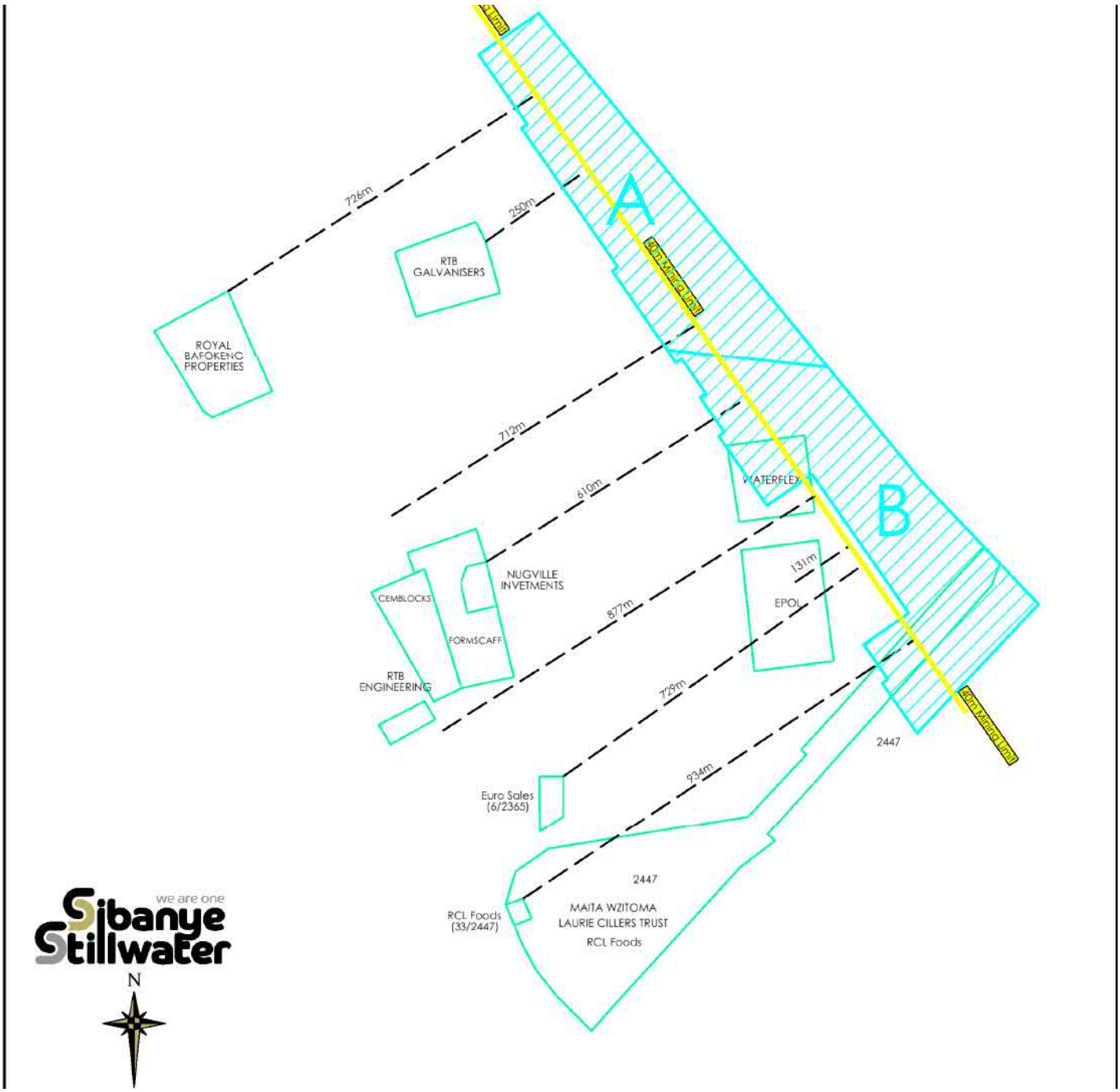
We trust that this letter satisfies your concerns and requirement. Please feel free to contact our project team should you have further concerns and enquires (jacques.gouws@sibanyestillwater.com).

Yours sincerely,

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Signed at:2024-12-19 13:58:23 +02:00
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19/12/24

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Postal Address:
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Tel: +27 14 536 4000

To: Maita Wzitoma (Pty) Ltd

20 December 2024

Email: wouterw@mweb.co.za

For Attention: Mr Wouter van der Westhuizen

Dear Mr van der Westhuizen

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

The risk mitigation efforts are guided by our commitment to protect the environment and the wellbeing of stakeholders in areas within which we operate as per our Environmental, Social and Governance (ESG) policy. SRPM have undertaken specialist investigations pertaining to the project to ensure that project impacts are avoided and minimised. To this effect:

- SRPM undertakes to ensure that the dewatering of the aquifer is minimised and that borehole water availability is not impacted by the project by sealing any water intersections during mining. To monitor the groundwater related impacts of the project, SRPM will place five (5) monitoring boreholes around the project area , as per the specialist study recommendations, to continuously track ground water levels and ground water quality. SRPM undertakes to provide an alternative water supply for directly affected water boreholes should any impacts occur because of the Kwezi Shallows mining activities, subject to scientific investigations.
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- SRPM commits to follow the recommended pillar and geometry mining span guidelines to avoid any subsidence due to underground mining. In addition, SRPM will install surface subsidence monitoring stations to measure and monitor subsidence.

SRPM commits to remain true to the values of Sibanye Stillwater by extending due care ensuring that the environment and stakeholders are not worse off due to mining activities. However, should you experience negative effects due to the project, SRPM will engage in a consultative process to identify root causes, corrective actions, and amicable solutions. SRPM is also proposing to set an independent monitoring committee up to ensure that the Kwezi Shallows project activities are monitored and reported to you and all other interested and affected parties.

We trust that this letter satisfies your concerns and requirement. Please feel free to contact our project team should you have further concerns and enquires (jacques.gouws@sibanyestillwater.com).

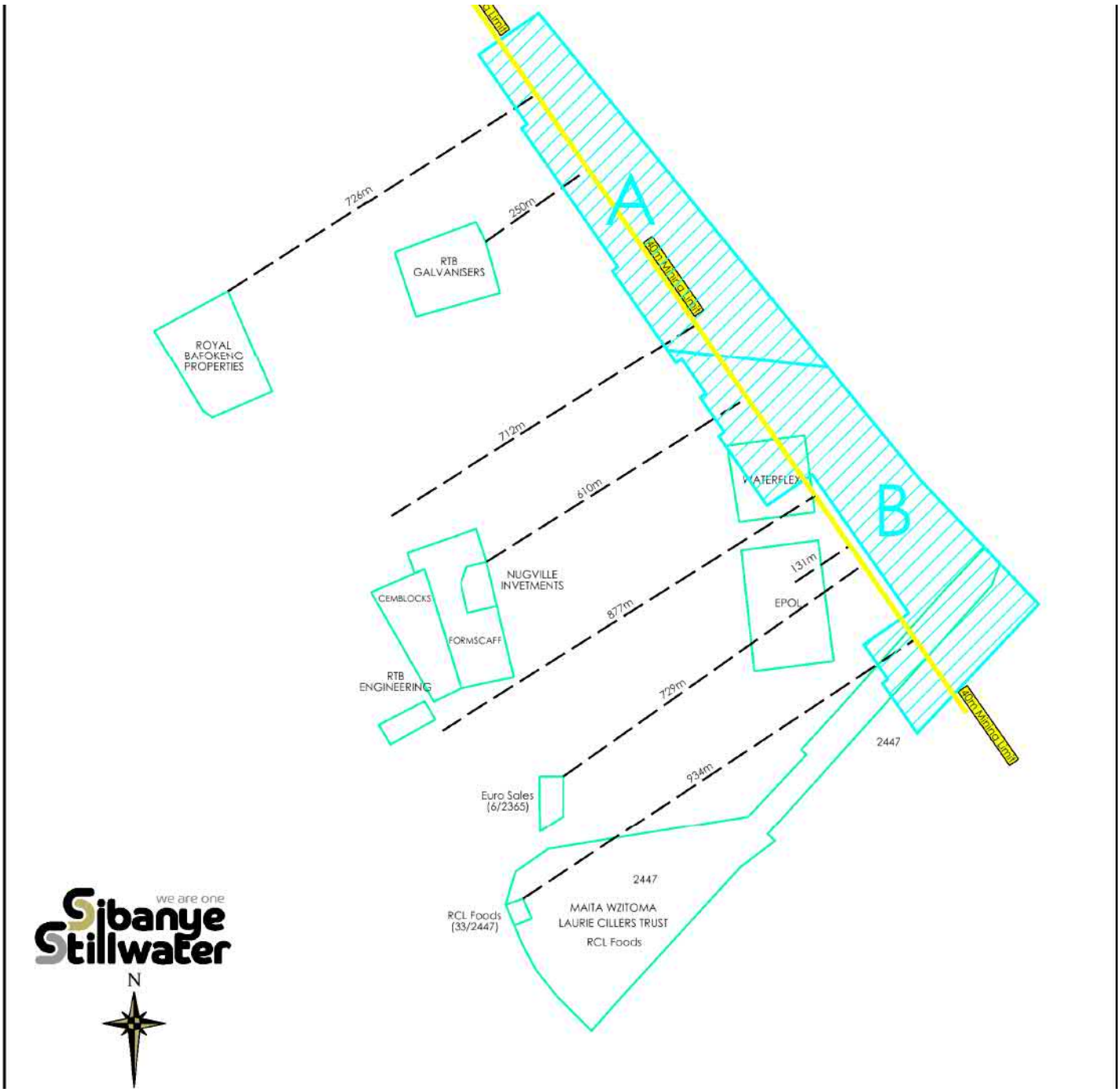
Yours sincerely,

Directors: NR Mughovani and JD van Aswegen
Company Secretary: Lerato Matlosa

Signed by:Bonginkosi Richman Ngqulung
Signed at:2024-12-19 13:58:21 +02:00
Reason:I approve this document

19/12/24

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Libanon | Westonaria | 1780

Business Address:
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Old Mine Road
Rustenburg | 0299

Postal Address:
PO Box 624 |Kroondal | 0350

Tel: +27 14 536 4000

To: Nugville Investments

20 December 2024

Email:

For Attention: Mr Bilal Suliman

Dear Mr Suliman,

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. To clarify, under the scope of the current EA application, no mining activities will take place outside the defined boundaries of Blocks A and B.

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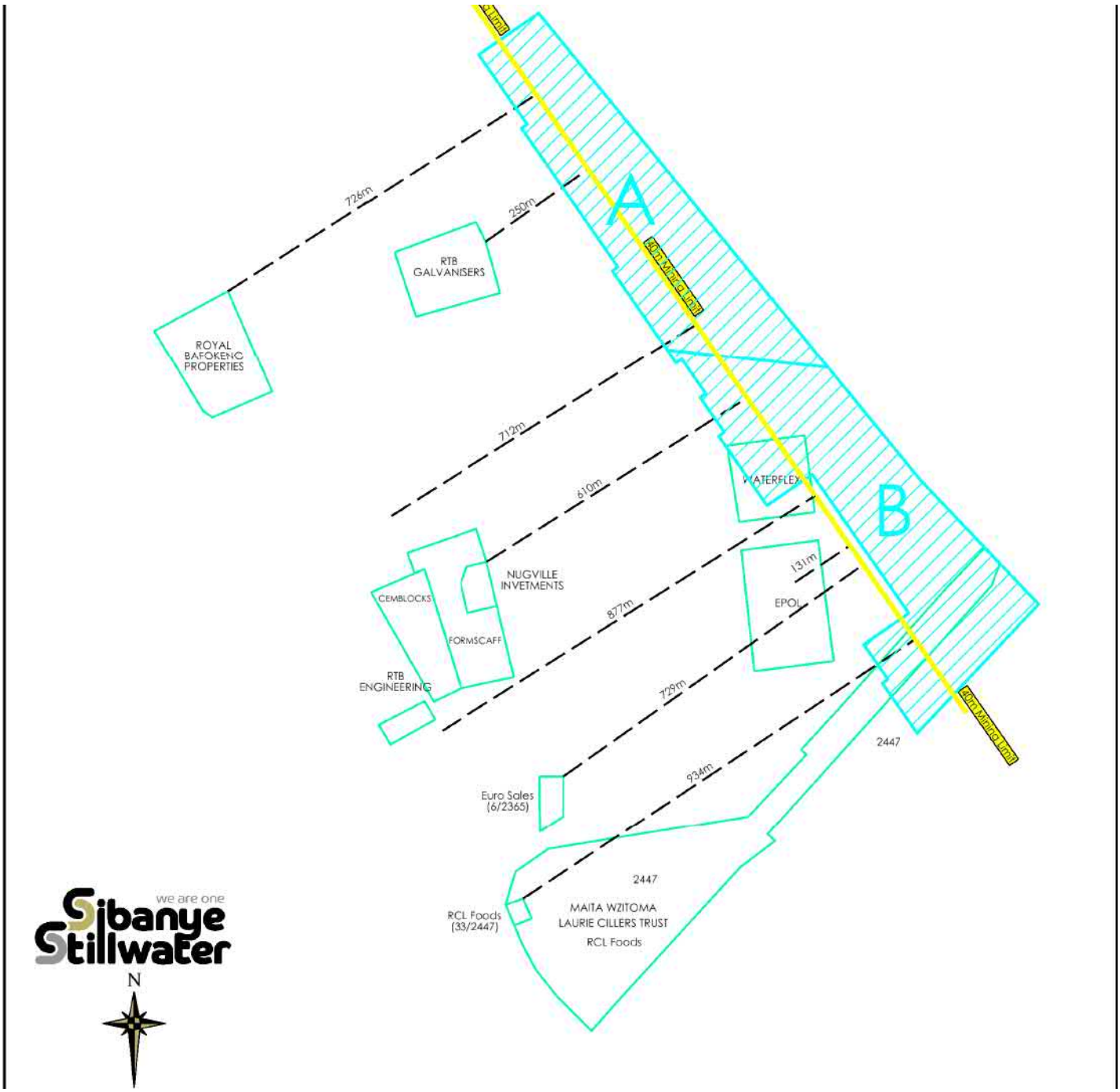
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Yours sincerely,

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Reason:I approve this document

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Postal Address:
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Tel: +27 14 536 4000

To: Rustenburg Engineering and Foundry (Pty) Ltd

20 December 2024

Email:

For Attention: Jacques Ferreira

Dear Mr Ferreira,

RE: Assurance Regarding the Kwezi Shallow Operations

Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) acknowledges the concerns that you have raised regarding the mining activities associated with the Kwezi Shallows Operations. SRPM hereby therefore gives the assurance that SRPM has conducted a comprehensive due diligence and risk assessment process to mitigate the risk of mining within Blocks A and B of the Kwezi Shallows Operation (please see last page for a map).

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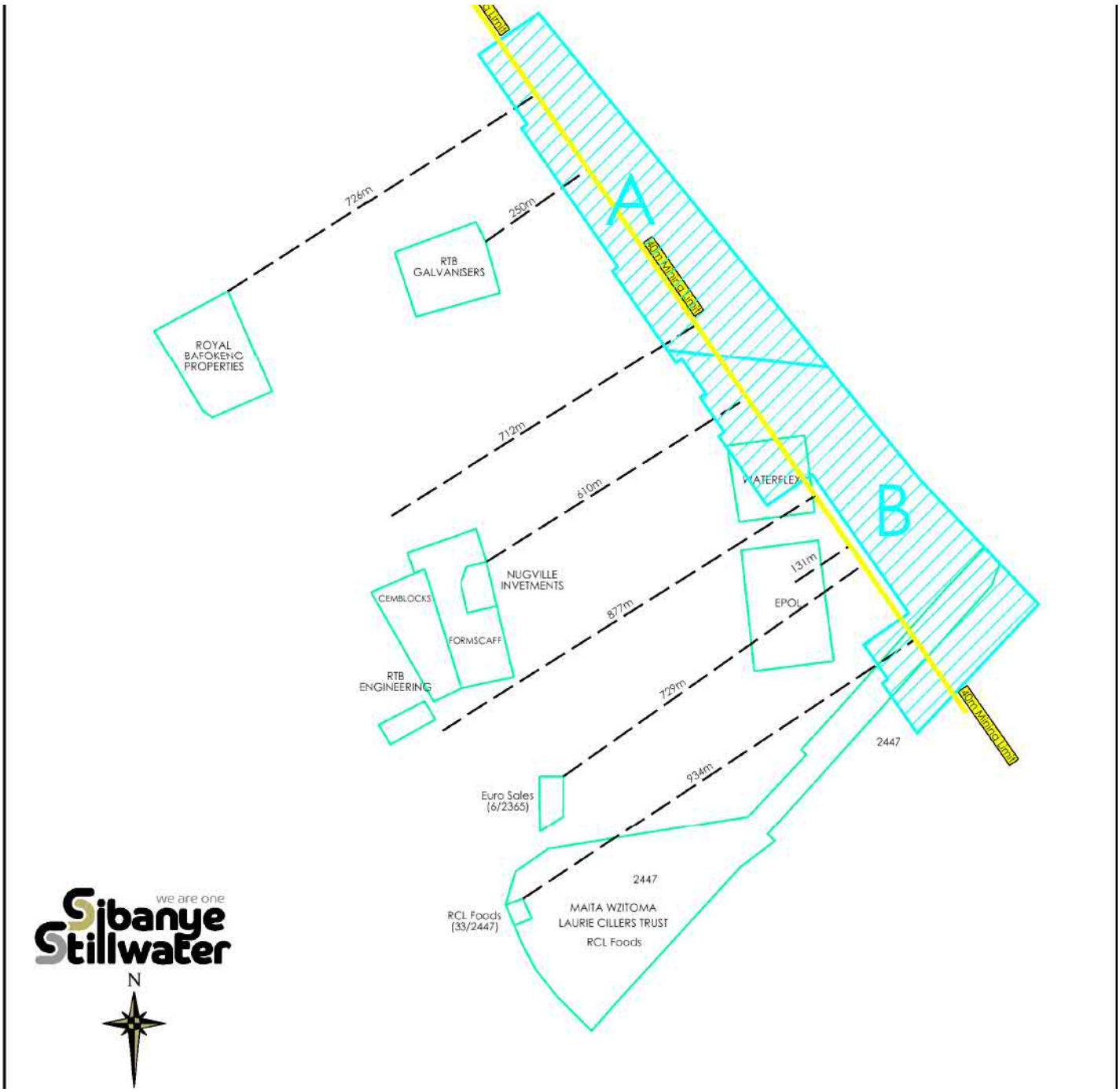
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To: Rustenburg Galvanizers

20 December 2024

Email:

For Attention: Dirk Odendaal

Dear Dirk,

RE: Assurance Regarding the Kwezi Shallow Operations

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Company Secretary: Lerato Matlosa

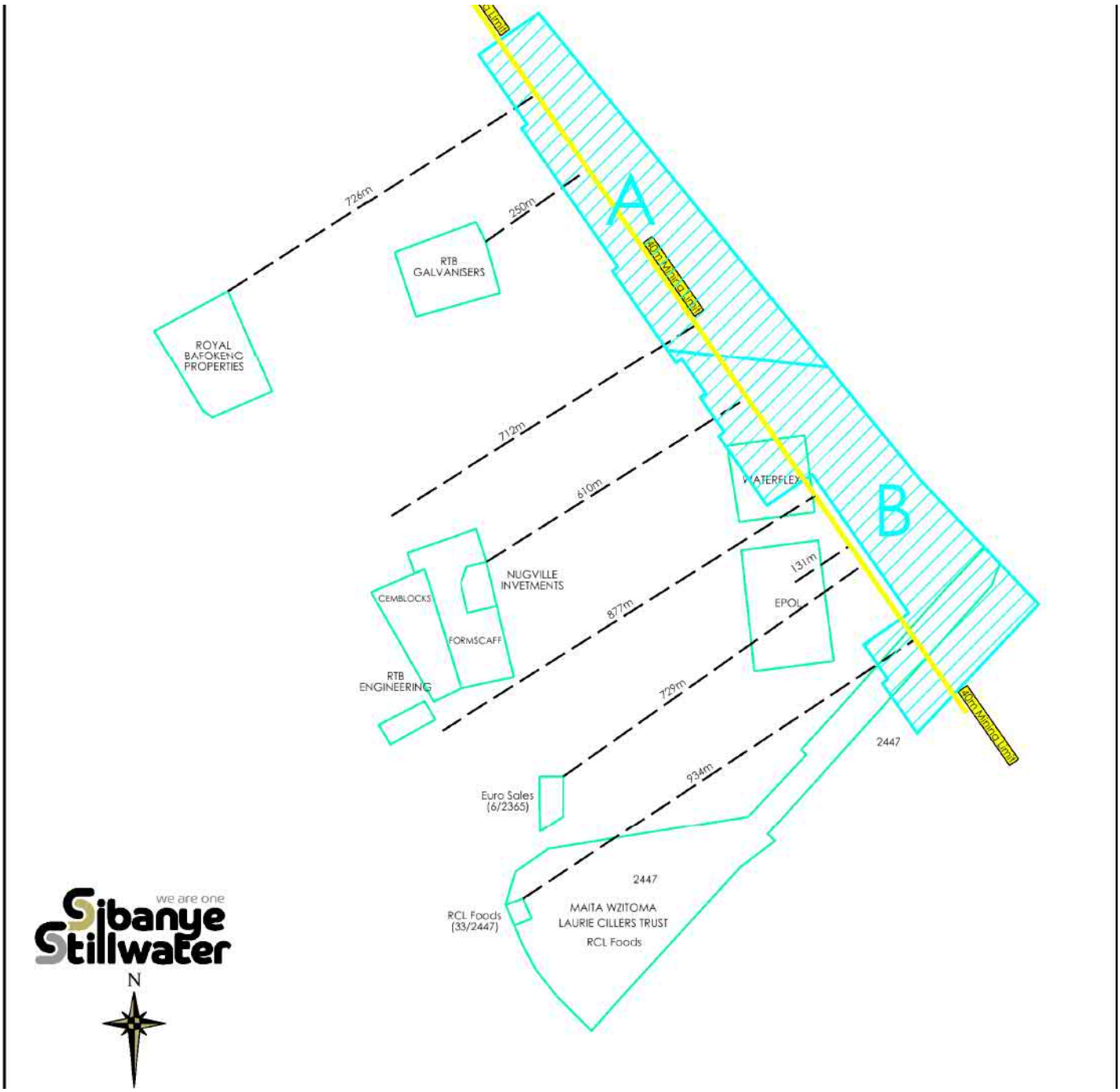
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Tel: +27 14 536 4000

To: Mr Arthur Cockcroft

20 December 2024

Email:

For Attention: Mr Arthur Cockcroft

Dear Mr Cockcroft,

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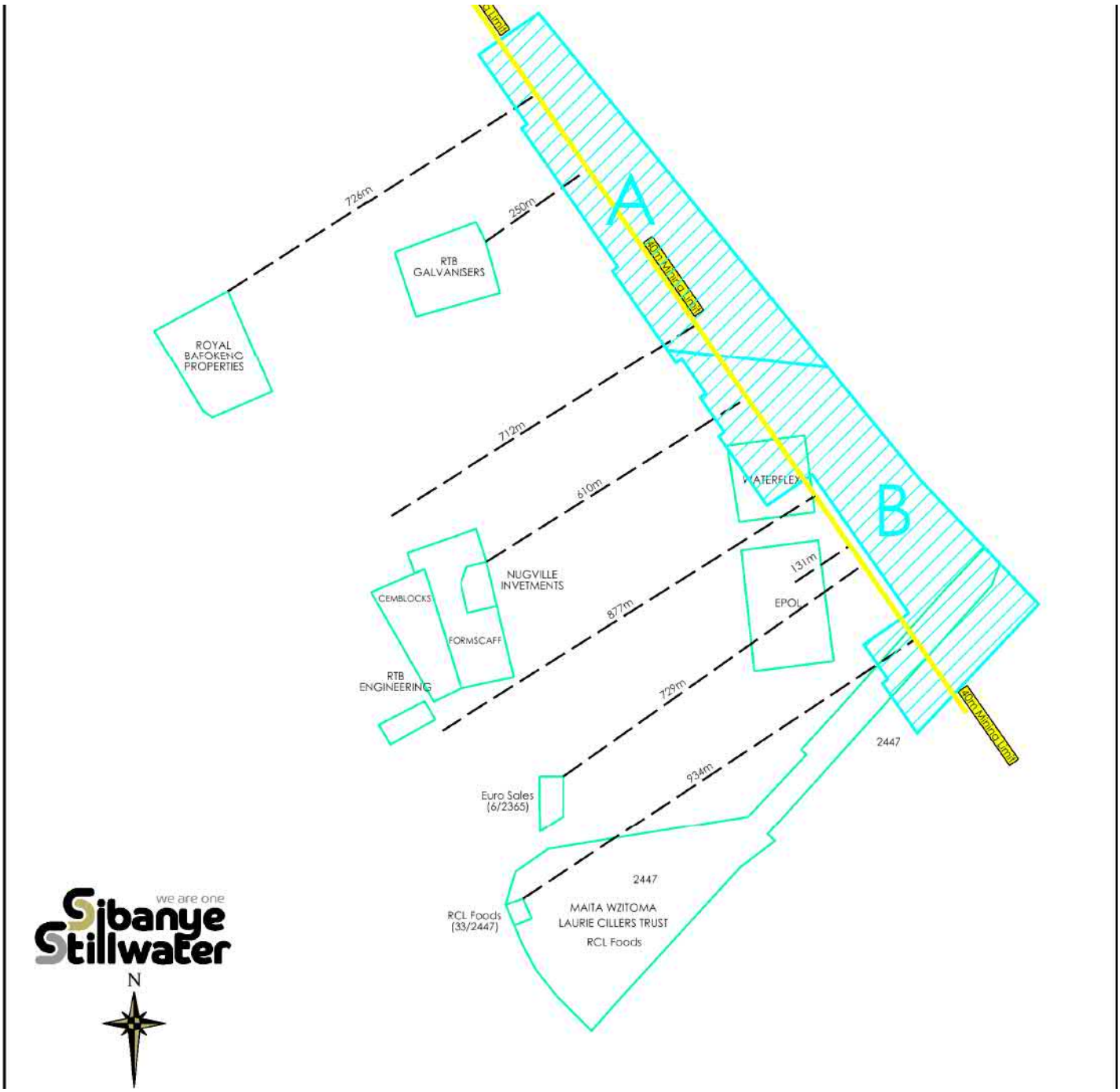
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Yours sincerely,

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Signed at:2024-12-19 13:58:24 +02:00
Reason:I approve this document

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Postal Address:
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To: Cemblocks

20 December 2024

Email:

For Attention: Francois Alberts

Dear Francois,

RE: Assurance Regarding the Kwezi Shallow Operations

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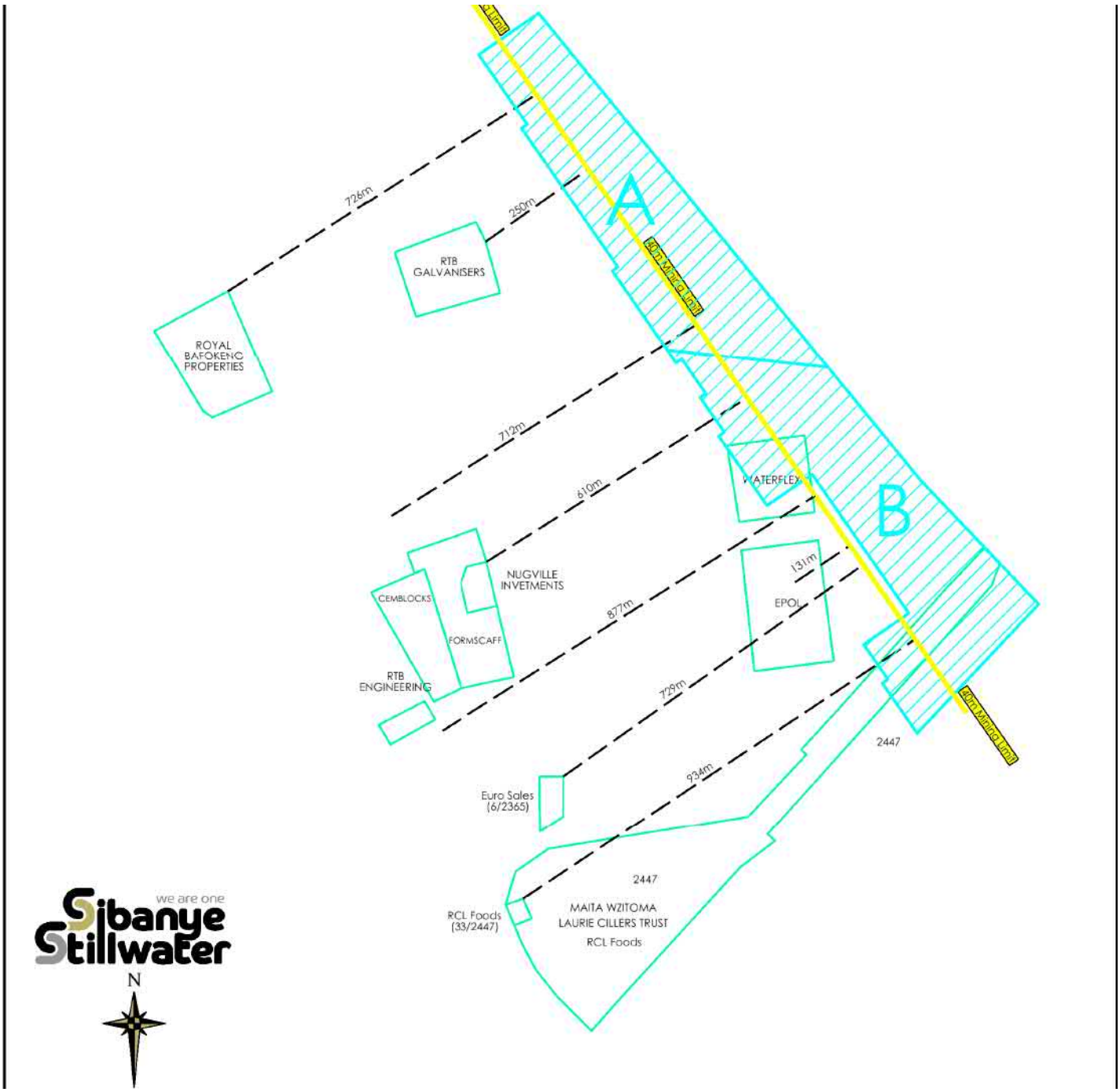
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Alta van Dyk Environmental
"…for the silent ones…"

Postnet Suite #745
Private Bag X1007
Lyttleton
1040

Tel: 012 940 9457
Cell: 076 314 3604
Fax: 086 634 3967
reata@avde.co.za

20 January 2025

Dear Ms Gugu Manyathi and Mr Loren Laker

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

Alta van Dyk Environmental Consultants (Pty) Ltd acknowledges receipt of the submission made by Rainbow on the 16 January 2025 in terms of the above-mentioned project. Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) hereby provides a response to the comments received in Table 1 below.

If you have any further queries, please direct them to Kirthi Peramaul.

Kind regards,

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457
Fax number: 086 634 3967
Postal Address: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
Email: kirthi@avde.co.za

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Table 1: Comments Received and Correlating Response

Comment	Response
1. We write with reference to the above subject matter and the engagements between RCL Foods Consumer (Pty) Ltd t/a Rainbow Chicken ("Rainbow"), Sibanye Rustenburg Platinum Mines (Pty) Ltd ("Sibanye") and your offices to date.	Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) and Sibanye Rustenburg Platinum Mines (SRPM) acknowledge the submission as provided on the 16 January 2025. The submission together with the response will be included in the Final Basic Assessment Report and submitted to the Department of Mineral and Petroleum Resources (DMPR) for consideration in the decision-making process.
2. Rainbow wishes to make particular reference to the virtual MS Teams call held on 12 December 2024 between representatives of all the parties, namely, Rainbow Alta van Dyk Consulting Group("AVD") and Sibanye (herein the "Call"). This correspondence does not seek to outline the entire discussion of the Call, but rather to focus and follow up on the concerns raised and requests made by Rainbow during the Call, as well as Sibanye and AVD's representations and commitments made in response thereto.	AvDE and SRPM acknowledge that a Focus Group Meeting was held on the 12 December 2024. Attached to this submission are the minutes of the meeting. The meeting recording and the presentation was made available to Rainbow, Loren Laker, on the 12 December 2024. The action items noted from the meeting includes the following: 1. SRPM to provide Rainbow with a written representation that the mining activities will not be undertaken below the Rainbow plant. a. SRPM provided a response on the 19 December 2024 indicating that The Environmental Authorisation (EA) process currently in progress pertains exclusively to mining activities within Blocks A and B. Consequently, any mining beyond the boundaries of Blocks A and B will necessitate a separate and comprehensive EA process. A layout plan was also attached to the submission clearly depicting that Epol/Rainbow falls out of the proposed mining areas. The following was agreed upon during the meeting: 1. Since the meeting was held on the 12 December 2024, Epol was granted an extension until the 8 January 2025 to provide additional comments that arose from the meeting. 2. The Geohydrological Assessment currently in the public domain remains the valid specialist report that shall be reviewed and commented on. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024.
3. Rainbow records that notwithstanding that the initial public participation process ("PPP") in respect of the EA Application and its draft basic assessment report was stipulated by AVD to conclude on 13 December 2024. In the Call, numerous concerns regarding the EA Application were raised by Rainbow, and, in particular, the concerns with Sibanye's inclusion of Rainbow-owned and operated property in the EA Application footprint and the associated likely adverse	The Basic Assessment Process is undertaken in terms of the NEMA EIA regulation. The 30-day legislated timeframe is in line with Regulation 3 (1) 8. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024. On the 19 December 2024 Epol/Rainbow requested an extension of the timeframe that was agreed up during the meeting held on the 12 December. Epol/Rainbow requested an extension until the 27 January 2025. SRPM provided a response

Comment	Response
impacts of blasting, Sibanye's plans to mine in close proximity to and under our building/s, and surface- and groundwater quality. In the Call, Sibanye and AVD committed to providing additional information to Rainbow and to granting Rainbow an extension on the PPP to properly comment on the EA Application documents and new information still to be received.	indicating that the process of discussions and communications remains open throughout. SRPM is committed to a continuous open, transparent, and fair process, not only because the legislative processes demand such, but also because SRPM as a company want to remain true to their values. To facilitate this, SRPM intends to set up a communications forum where they will be providing frequent feedback on their studies and the associated management and monitoring plans, hear concerns from interested and affected parties like Epol/Rainbow, and so forth. While SRPM promotes a continuous and open communication platform, a clear distinguishment must be made between the SRPM Communication Forms and the legislative required public engagement process. the extension of the public engagement process to the 27th of January 2025 is not feasible within the fixed legislative timeframe for the environmental authorisation application as a whole which is set forth and determined within the National Environmental Management Act. This results in the required cessation of the public engagement period and therefore the stakeholder comments that will be included within the application for regulatory authority consideration. Emphasis is however made on the fact that while the comment period for the environmental application process itself have closed that the communication form as set forth by SRPM remains open to promote ongoing engagement and the close out of questions or concerns regarding the project.
4. Rainbow understands that, as a result of the above, the PPP for the EA Application is still underway. Save for Sibanye's letter dated 20 December 2024, Rainbow further notes that following the Call, and despite follow up requests, the information and documentation which Sibanye and AVD committed to providing, has not been received to-date. Rainbow would therefore like to formally follow up on the additional information and documentation, as fully outlined below, to enable Rainbow to properly consider and prepare its comments on the EA Application.	To date comments were received from Epol/Rainbow on the following dates: • 01 October, 12 November, 5 December and 12 December 2024. The comments provided were discussed during the meeting held on the 12 December 2024 between AvDE, Epol/Rainbow and Sibanye Stillwater. • In addition to the Focus Group Meeting a formal response submission will be provided to Epol/Rainbow upon the submission of the Final Basic Assessment Report to the DMPR. AvDE is confident that the stakeholder has had sufficient information to have had provided an informed comment on the application: • The geohydrological Assessment

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	• The Blast and Vibration Assessment (which includes the geology aspects) • The Draft Basic Assessment Report • The layout of Block A and B as discussed in the meeting held on the 12 December 2024
5. In order to participate meaningfully as a registered interested and affected party and to be provided with all relevant information in respect of the EA Application and Sibanye's proposed activities, Rainbow requested and hereby follows up on its request that Sibanye provide the following information and documentation: - a. Geotechnical Reports which include data indicating (i) the distance from the edge of the mining Blocks A&B and Rainbow's building/s situated and described as Erf 2539, Erf 1/2312 and Erf 7164; and (ii) the potential impacts on soil; b. Confirmation of all regulatory restrictions, buffers and relevant approvals needed for mining in close proximity to existing structures; and c. Updated ground level water drawdown data ensuring that accurate data is considered in the assessment of boreholes 8 and 9, privately owned by Rainbow.	In terms of the requested documents: a. The Blast and Vibration assessment has been provided as part of the Basic Assessment Process whereby the geology of the study area is also discussed. The impacts assisted with subsidence and erosion has been included in Table 7-1 of the report. Reference to Epol/Rainbow in terms of the subsidence has been included on Page 21. The Blast and Vibration assessment revealed the following: a. The mine employs the bord and pillar mining operation. Pillars are the solid blocks of ground that is not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75% leaving 25% intact to limit surface subsidence. From a pillar perspective numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction ratio and Stress Concentration Factor SCF for each individual pillar. From the risk classification, the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellite's to gather the data. b. The Reg 17 application in terms of Mine Health and safety obligations was submitted on 12 September 2024 to the Department of Mineral and Petroleum Resources (DMPR). In terms of the buffers associated with the National Water Act (100m from a watercourse and 500m from a delineated wetland), such buffers have been considered as part of the

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Comment	Response
	application, hence a Water Use License Application Process is currently underway with the Department of Water and Sanitation. In addition, a Freshwater Assessment has been commissioned as part of the application which assessed the potential impacts associated with the underground mining activities in relation to the delineated watercourses. The Freshwater Assessment has been included as Part of the Basic Assessment Report. In terms of NEMA and NEMWA, there are no buffer requirements in terms of this application. c. As previously mentioned, the geohydrological assessment report currently in the public domain remains the valid specialist report for review and comment. This report has taken into consideration Boreholes 8 and 9 as well as the groundwater drawdown. The project team takes note that during the meeting held on the 12 December 2024, there were discussion that any updates to the report will be as a result of the SRPM monitoring and management plan which will be discussed and shared with I&APs through the established and recognised forums/committees.
6. Rainbow understands that, pursuant to the Environmental Impact Assessment regulations, registered interested and affected parties must be provided at least 30 days to review and comment on information and documentation related to the EA Application, including any new information provided by Sibanye in accordance with the above application.	The Basic Assessment Process is undertaken in terms of the NEMA EIA regulation. The 30-day legislated timeframe is in line with Regulation 3 (1) 8. Epol/Rainbow was informed of the availability of the Draft Basic Assessment Report and associated specialist studies on the 13 November 2024. On the 12 December 2024, a Focus Group Meeting was held with Epol/Rainbow to address some of the comments raised and to provide the opportunity for the AvDE and SRPM team to discuss the project. Although the meeting was held into the latter part of the legislated 30 day comment period, no new project information supporting the project has been available in support of the project. On the 19 December 2024 Epol/Rainbow requested an extension of the timeframe that was agreed up during the meeting held on the 12 December. Epol/Rainbow requested an extension until the 27 January 2024. SRPM provided a response indicating that the process of discussions and communications remains open throughout. SRPM is committed to a continuous open, transparent, and fair process, not only because the legislative processes demand such, but also because SRPM as a company want to remain true to their values.

Comment	Response
	To facilitate this, SRPM intends to set up a communications forum where they will be providing frequent feedback on their studies and the associated management and monitoring plans, hear concerns from interested and affected parties like Epol/Rainbow, and so forth. While SRPM promotes a continuous and open communication platform, a clear distinguishment must be made between the SRPM Communication Forms and the legislative required public engagement process. the extension of the public engagement process to the 27th of January 2025 is not feasible within the fixed legislative timeframe for the environmental authorisation application as a whole which is set forth and determined within the National Environmental Management Act. This results in the required cessation of the public engagement period and therefore the stakeholder comments that will be included within the application for regulatory authority consideration. Emphasis is however made on the fact that while the comment period for the environmental application process itself have closed that the communication form as set forth by SRPM remains open to promote ongoing engagement and the close out of questions or concerns regarding the project. AvDE is confident that the stakeholder has had sufficient information to have had provided an informed comment on the application.

Alta van Dyk Environmental
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28 January 2025

Dear Le Roux Eckaard Attorneys

BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

DMRE Reference: NW30/5/1/2/2/80MR

Alta van Dyk Environmental Consultants (Pty) Ltd acknowledges receipt of the submission made by Le Roux Eckaard Attorneys on the 26 November 2024, 5 December 2024, 13 December 2024, and 17 January 2025 in terms of the above-mentioned project. Alta van Dyk Environmental Consultants (Pty) Ltd (AvDE) hereby provides a response to the comments received in Table 1 below.

In addition, attached to the submission are the following:

- Environmental Management and Monitoring Plan
- Cross Section drawing showing the mining limit in relation to BH1

If you have any further queries, please direct them to Kirthi Peramaul.

Kind regards,

Kirthi Peramaul
Alta van Dyk Environmental Consultants (Pty) Ltd
Tel number: 012 940 9457
Fax number: 086 634 3967
Postal Address: Postnet Suite #745, Private Bag X 1007, Lyttelton, 0140
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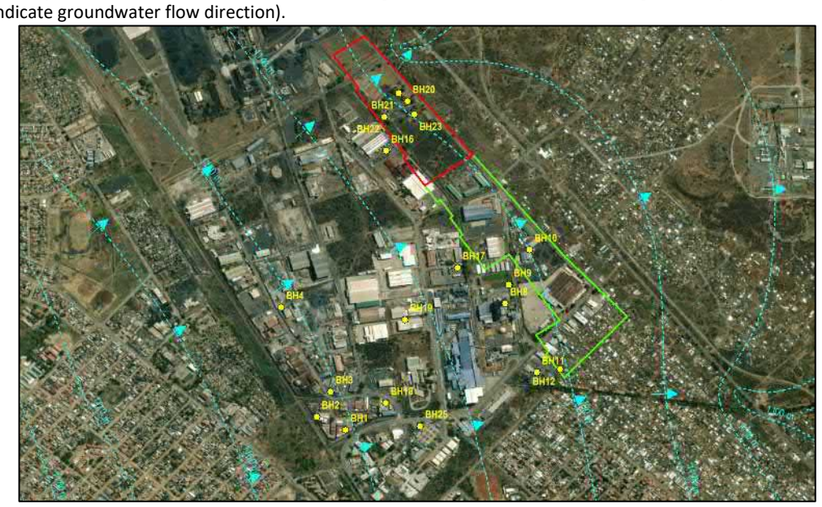
Table 1: Comments Received and Correlating Response

Comment	Date	Source	Response
1. Concerns Regarding our client's borehole Our client's factory relies solely on a single borehole as its water source, which is critical for ongoing operations. The proposed mining activities at this depth may: • disrupt the aquifer supplying the borehole; and/or • cause structural damage to the borehole and its equipment, compromising its functionality. Without this water supply, our client's operations will be severely affected, potentially leading to significant financial losses. The municipal water supply is unreliable and almost non-existent. Our client has a municipal water connection, but there is never any water. As a result, there are 25 boreholes in this industrial area. The municipal water pipes are old clay pipes that constantly break. Our client does not have any access to water except through their borehole. We request detailed information about any hydrogeological assessments you have conducted and the measures you plan to implement to protect groundwater and boreholes (there are 25) in the vicinity of your proposed operations. **2. Concerns About Structural Integrity** The factory infrastructure is at risk of damage from: • subsidence due to underground mining; and/or • vibrations or other ground movement associated with mining activities. We request a copy of any geotechnical studies that assess the potential impacts of your operations on neighbouring structures, including mitigation plans. **3. Impact on Insurance Coverage** Our client's current insurance policy excludes damages arising from earthquake arising from mining activities, leaving them financially exposed. Our client has been approached with a request to permit a property evaluation and a housing crack survey on their property as part of the proposed underground mining expansion plan. We believe this request is primarily intended to protect the mine from potential future compensation claims, particularly in disputes over the extent of damage caused or, in cases of total loss, the market value of the property. This strongly shows that the mine anticipates the likelihood of its operations, if extended, resulting in property damage or loss. Should our client's insurance coverage be adversely affected in any way, our client insists on equivalent replacement coverage, to be provided as an unconditional guarantee from your client, covering the full replacement value. We therefore request confirmation that the mine will indemnify our client for any damages to the borehole, factory, or associated infrastructure caused by your mining activities. **4. Compliance with Environmental and Water Laws** Please provide documentation demonstrating compliance with the following: • Environmental Authorization: Has the Environmental Impact Assessment (EIA) for your mining operations addressed the risks to our client's property and borehole? • Water Use License (WUL): Does your WUL account for potential impacts on aquifers and nearby boreholes? **5. Request for Mitigation and Compensation Plans** To address these concerns, we request that you: • Conduct a detailed hydrogeological assessment of the borehole and aquifer to determine the potential impacts of your proposed operations. • Commit to providing an alternative water supply, such as drilling a new borehole or connecting our client's factory to municipal water, should their current borehole be compromised. • Develop and implement measures to prevent subsidence and structural damage to our client's factory. • Enter into an agreement to compensate for any damages or operational disruptions caused by your mining activities. • Establish a joint monitoring program to track groundwater levels and structural impacts throughout your operations.	**26 November 2024**	Email	**<u>Concerns Regarding our client's borehole</u>** A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Geohydrological Assessment was made available as part of the Basic Assessment Report. Euro Sales was informed of the availability of the report on the 13 November 2024. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources (from a short- and long-term perspective). The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The in-depth questions that have been made specifically around BH1 have been addressed as part of this submission and included below. **Geohydrological Assessment** • ***Groundwater Level and Recovery*** The Euro Sales borehole is referred to as BH1 in the geohydrological report. The borehole is situated 920m from the closest proposed mining block. Although the numerical modelling has shown a potential water level drawdown extending to BH1, the modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there was no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface). ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over-conservative. Any model needs to be verified through ongoing field investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH1 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Euro Sales monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Rustenburg Platinum Mines (SRPM). Environmental Monitoring Committee as

Comment	Date	Source	Response
6. Legal and Regulatory Obligations Our client reserves all rights to: • Lodge objections during the public consultation process under the Mineral and Petroleum Resources Development Act (MPRDA) and National Environmental Management Act (NEMA). • Notify the Department of Water and Sanitation (DWS) and Department of Mineral Resources and Energy (DMRE) of any risks arising from your operations. • Pursue legal remedies, including an interdict to halt your operations, should imminently harm to their property or operations become clear. **7. Request for Response** We kindly request your response to this letter (and the questions and concerns raised here) within 10 business days, addressing the concerns raised and providing the requested information. Your cooperation in resolving these issues proactively will be greatly appreciated. Our client is committed to collaborating constructively with your company to ensure that their operations and property are safeguarded. However, they cannot accept undue risks to their water supply, infrastructure, or business continuity. We urge you to engage in good-faith discussions to address these issues comprehensively.			to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. **Service Delivery** SRPM is unable to comment on service delivery issues with the RLM. Comments on service delivery must be directed to the relevant authority. **<u>Concerns about Structural Integrity</u>** A Vibration and Stability assessment has been undertaken by an independent specialist. The Vibration and Stability Assessment has been included as part of the Basic Assessment report. The report was made available as part of the Basic Assessment Report which was made available to Euro Sales on 13 November 2024. The mine employs the bord and pillar mining operation method. Pillars are the solid blocks of ground that are not mined and the bords are areas that will be extracted. The total extraction in the area equates to approximately 75%, leaving 25% intact to limit surface subsidence. From a pillar perspective, numerical modelling was undertaken. See section 4 From Page 8 – Page 15 Kroondal West Vibration, Blast and Stability Assessment. In terms of the numerical modelling, the Categorized Risk Classification is the Theoretical Extraction Ratio and Stress Concentration Factor (SCF) for each individual pillar. From the risk classification the risk rating for the proposed pillars is classified as low. The likelihood of having total pillar collapse is low due to the high Factors of Safety (FoS) on the pillars. See figure 4.8 page 15 Kroondal West Blast and stability assessment. Surface subsidence will be monitored by the mine by making use of the INSAR remote monitoring using remote satellites to gather the data. The site will also implement a monitoring and management programme, which will include Light Detection and Ranging (LIDAR) for subsidence monitoring. In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some form of vibration. These vibrations are typically measured as peak particle velocities, and reported in mm/sec. The South African guidelines in terms of maximum allowable Peak Particle Velocity (PPV's) refers to the guidelines set out by the United States Bureau of Mines (USBM) that are typically used. See Table 5.1 Page 21 –Kroondal West Vibration, Blast and Stability Assessment. In terms of the Ground Vibration Standards as per the USBM, for rural buildings -mud houses a ground vibration limit of 6 mm/sec has been assigned. The empirical and theoretical calculations for the proposed blasting indicated that the PPV causes is well below the 6 mm/sec, which is 2 mm/sec. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Specific designs with regard to the length of round that is blasted will be limited to only 2.0 m per blast. The explosive type will be a low-density explosive to further assist with reducing the impact of blast vibrations. See figure 5.1 Page 22 Kroondal West Vibration, Blast and Stability Assessment. Blast vibration monitoring will be undertaken by the mine to ensure that blast vibrations remain below the required levels. See Section 5.2 page 25 Kroondal West Vibration, Blast and Stability Assessment. **<u>Impact on Insurance Cover</u>** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **<u>Compliance with Environmental and Water Laws</u>** **National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)** The legislated obligation in terms of the proposed project is acknowledged. The Basic Assessment Process has been undertaken in terms of the NEMA EIA Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Euro Sales borehole was included as part of the Hydrocensus and the geohydrological assessment. The potential impacts as assessed by the independent specialist has been included in the Basic Assessment report. **National Water Act (Act 36 of 1998)** A Water Use License Application (WUL) is underway with the Department of Water and Sanitation. The Euro Sales borehole was included as part of the Hydrocensus and the geohydrological assessment. The potential impacts as assessed by the independent specialist will be included as part of the WUL submission. The WUL when issued by the Department of Water and Sanitation comes with its own conditions that needs to be adhered to by the applicant. This includes monitoring frequencies, parameters, and auditing requirements. **<u>Request for Mitigation and Compensation Plans</u>**

Comment	Date	Source	Response
			• A detailed geohydrological assessment has been undertaken as part of the Basic Assessment Process. A copy of the report was made available to Euro Sales on 13 November 2024. • SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. • An Environmental Management and Monitoring Plan has been compiled by SRPM. The plan details blast and vibration monitoring to be undertaken. **The Environmental Management and Monitoring Plan has been attached to this submission.** • Sibanye Stillwater commits to compliance with the management and monitoring plan as well as the establishment of the environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. **Legal and Regulatory Obligations** Alta van Dyk Environmental Consultants has been appointed by Sibanye Stillwater as an independent Environmental Assessment Practitioner to undertake the required environmental approval process. The public Participation has been undertaken in line with Regulation 41 of the Environmental Impact Assessment Regulations 2014 (as amended). The objective of the public participation process is to involve the public in the DMPR's decision making process to improve the quality of decisions. The NEMA EIA PP process therefore allows for public comment and participation through the Focus Group Meetings and the availability of the Draft Basic Assessment Report. Both the DMPR and the DWS will be informed of the comments and concerns raised through this Environmental and Water Use Authorisation Process. The comments received are captured in the Comments and Response Report and submitted with the Final Basic Assessment Report to the DMPR for decision making. **Request for Response** A meeting was set up by SRPM and AvDE with Le Roux Eckaard Attorneys and Euro Sales for the 4 December 2024.
1. How Sibanye-Stillwater has determined the possible impact on Euro Sales' borehole (BH1) as negligible, as Euro Sales is located within the 1km radius identified as the potentially impacted zone by the Geohydrological Impact Assessment (page 50). 2. The Geohydrological Report determined the water level will drop by ~ 9 m below the depth of BH1 and may remain dry post-closure of the Kwezi Operation (reference made to pages 52-54, and Table 7.1. 3. Pg 36 "This elevation of approximately 1 097 mamsl will to some degree control the level to which the mine water level will recover. In the Kwezi extension area, the dewatering cone that could develop may not fully recover if this decant occurs. In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure" The lawyer was not comfortable with this statement and the impact of decant. 4. How the mitigation and rehabilitation measures will protect BH1 against this scenario- Sibanye-Stillwater will advise. 5. The potential deterioration of the water quality as a result of the proposed mining operations, as many of the ES tenants are reliant on potable water from BH1 (reference made to page 57).	**4 December 2024**	Teams Meeting	A response to the comments received during the meeting is provided below: <u>Geohydrological Impact Assessment</u> • ***Groundwater Level and Recovery*** The Euro Sales borehole is referred to as BH1 in the geohydrological report. The borehole is situated 920m from the closest proposed mining block. Although the numerical modelling has shown a potential water level drawdown extending to BH1, the modelling is only a theoretical exercise and presents the conservative scenario. It is very important to understand that a groundwater model (which was used to predict the potential water level drop) is merely a tool that is used to interpret future changes to the aquifer system. This implies that there are always discrepancies associated with groundwater models. A numerical groundwater model is a representation of the real system and is calibrated according to field data. In this instance the groundwater model was previously developed for the entire mining region and the data that was used consisted of the mine monitoring boreholes. Although there are 153 boreholes to which the model was calibrated (8% deviation), there were no site-specific borehole information available at the time. The closest boreholes are the Kwezi 5 Shaft boreholes that are approximately 1km north-east from the study area. In view of this, the results from the model should be viewed with good sense based on hydrogeological experience. The model results were nevertheless included as the Geohydrologist (independent specialist) believe that Sibanye-Stillwater should be made aware of this conservative scenario. The field observations on site noted the following: • There are several of the hydrocensus boreholes that are very close to existing mining (including mining up to 40m below surface. ○ BH 12 is 50m from existing mining. ○ BH20 is 70m from existing mining. ○ BH10 is 77m from existing mining. ○ BH21 is 81m from existing mining. ○ BH23 is 84m from existing mining. None of the boreholes listed above show any indication of impact from the existing mining. In addition, Mining along the eastern (up to 40m below surface) and northeastern boundaries of the proposed mining blocks have not experienced any groundwater inflow. This mining took place in exactly the same geological formations (aquifer) as the proposed mining underneath the industrial area. Based on this observation alone it is clear that the numerical model is over conservative. Any model needs to be verified through ongoing field

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Comment	Date	Source	Response
			investigations and adjusted where necessary. As said above, it is a tool through which the ongoing reaction of the aquifer can be represented and used for future predictions. It is not the only mechanism used to assess the risk to an area such as this. Extra precautions are therefore taken if there is an impact. In this instance ongoing monitoring is the best approach to monitor the risk of a potential impact. Taking into consideration the field data, there is a high confidence level from the geohydrologist that the water level in BH1 will not be impacted. The current monitoring plan (X5 boreholes to be monitored) will be used as an indicator. These boreholes will serve as a representative sample for the study area. SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. The proposed monitoring is important and will provide early warning if the groundwater (and quality) levels are affected. That will provide sufficient time for Sibanye to implement remedial measures and/or to provide alternative water. It is recommended as a potential impacted water user, that Euro Sales monitor their actual abstraction volumes as to keep these on record for future reference and report these to the Sibanye Stillwater Environmental Monitoring Committee supporting the update of any hydrological model. It should be noted that several surrounding water users will also be abstracting simultaneously as to support their business and will be requested to keep similar abstraction records for reporting to the Sibanye Stillwater Environmental Monitoring Committee as to increase the confidence levels of the hydrogeological model. Apart from mining, existing bulk water users have not indicated their total water demand from their boreholes to sustain their industrial processes and may therefore already impact upon one another as abstraction may already exceed sustainable recharge. • ***Water Quality*** According to the geohydrological investigation, it is very unlikely that any of the private borehole water quality will be impacted on by any mining activity, mainly because the groundwater gradient and flow is northeast. In other words, the flow is towards the mining area, which is down-gradient from the industrial area. Any contamination in the mine or from mining infrastructure will therefore migrate away from the industrial area (see Figure below – blue arrows indicate groundwater flow direction).  Borehole BH5 is 794m from the proposed mining. The chemical analysis of BH5 showed poorer quality than the other boreholes that were also sampled. The water has high salt content as indicated by the elevated concentrations of EC, TDS, sulphate and magnesium.BH5 is located up-gradient from the mine and mining infrastructure. Groundwater flow is therefore from BH5 towards the mine. Since contaminant migration is dependent on the groundwater flow direction, any contamination that may be present in the mine water will flow northeast and away from BH5. The mine or mining infrastructure cannot impact on this borehole and the poorer quality is most likely from another source. This is supported by the fact that the boreholes closer to the mining operations do not show similar or poorer water quality results.

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Comment	Date	Source	Response
			It should be remembered that this borehole is within an industrial area and that there are numerous other contamination sources, unrelated to mining are currently presents and is impacting on the borehole. A geochemical assessment that was done on the waste material concluded the following: • The Leachable Concentrations in the Kwezi waste rock shows that the only metal that exceeds the LCT0 threshold is manganese. It should be noted that Kwezi WRD was leached using acetic acid instead of distilled water. o The Kwezi waste rock material was classified utilising the Toxicity Characteristics Leaching Procedure (TCLP) Leach test. This is an acid-based test which force leaches the material and as such represents elevated results. The underground shaft areas where the waste rock will be disposed of would be considered a mono-disposal site, where the neutral to slightly alkaline conditions would prevail, with the likelihood of no leaching of any element above LCT0 to take place. • The Total Concentrations in the Kwezi waste rock shows that the only metals that exceed the TCT0 threshold are copper and nickel. It is important to note that LCT values are indicators utilized for impact consideration and quantification rather than the TCT values. • The model results for the underground mine voids indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The expected quality of water that leach through this material is expected to be good quality as explained below. The geochemical risk assessment (GeoDyn, 2021) indicated that the mineral waste is unlikely to leach metal and metalloid contaminants into the groundwater in a post-closure scenario. Sulphate and nitrogen compounds were identified as potential leachates, however, the concentrations were shown to be unlikely to exceed regulatory guideline values, including the SANS 241 drinking water standards. With reference to the table below, the modelling results are as follows: • The model results for the underground mine voids indicates that the risk of the development of AMD (Acid Mine Drainage) conditions is negligible. The post-closure underground mine void geochemical system has acid neutralisation capacity, which is far more than the acid production capacity. • The model sulphate concentration is below regulatory guideline values, i.e. SANS 241 and R635 LCT0. This is due to the lower oxygen concentration in the underground mine voids. The TDS is significantly lower due to lower oxygen concentration in the underground mine voids. • Model nitrate and ammonia concentrations are shown to be low in the 100-year post-closure scenario. This is due to denitrification process related to microbial organisms present in the groundwater system. • Model metal and metalloid concentrations in the post-closure are very low. This is due to the relatively low sulphide mineral contents, the relatively low oxygen concentrations in the underground mine voids as well as the ability of the geochemical system to adsorb metals and metalloids, thereby removing them from the mine void water. Other than the flooded mine workings, there are no mining related contaminant sources in the vicinity. The simulation time for the geochemical models is 100 years post-closure. The model result is shown in the table below.

Parameter	RPM WUL 2018	Drinking Water	Underground Mine Void
pH	**6-9.5**	**≥5 to ≤9.7**	7.8
Total Dissolved Solids		**≤1 200**	740
Calcium	**<150**		241
Sodium			52
Potassium			5
Magnesium			38
Bicarbonate			26
Sulphate	**<200**	**≤500**	378
Chloride	**<200**	**≤300**	41
Nitrate	**<10**	**≤11**	0.2
Ammonium		**≤1.5**	<0.001
Aluminium		**≤0.3**	<0.001
Iron		**≤2**	<0.001

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<tr><th>Comment</th><th>Date</th><th>Source</th><th>Response</th></tr>
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<table>
<tr><td>Manganese</td><td></td><td>≤0.4</td><td><0.001</td></tr>
<tr><td>Nickel</td><td></td><td>≤0.07</td><td>0.001</td></tr>
<tr><td>Molybdenum</td><td></td><td></td><td>0.001</td></tr>
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Potential for Mine Water Decant
When all mining ceases and the pumping of water from underground stops, the mining void will fill with water. Eventually the mine will be completely re-watered, and the water level will stabilise at an elevation similar to the pre-mining groundwater level. Since there is no dewatering currently taking place, the current groundwater level will also be the final groundwater level. In a situation where the water in the mine void rises above the collar elevation of a particular shaft, decant will occur at that point. Thembelani 2 shaft is potentially such a point. None of the other shafts are below the estimated final groundwater level. The Thembelani 2 Shaft is only 0.6m below the groundwater level and a low decant volume (if any) is expected. It is also common practise for the mines to backfill and plug the shafts when rehabilitating. A Section 21 g in terms of the National Water Act has been included as part of the WUL for the backfilling of the mining area. In doing this, the potential for decant is negated. The geohydrologist therefore does not see this as a potential risk, although it was brought to Sibanye-Stillwater's attention in the groundwater report. As part of this application, SRPM is applying for a Section 21 g water use in terms of the NWA for the backfilling of the underground workings.
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1. Reiteration of Our Client's Concerns
Our client stays deeply concerned about the potential impacts of the proposed mining activities, as found by your experts, including:

Groundwater Depletion: The risk of significant drawdown in groundwater levels, making borehole BH1 unusable during operations.
Water Quality Degradation: Potential contamination of groundwater due to mining activities (such as backfilling etc.), detrimentally affecting a water resource.
Groundwater Recovery Post-Mining: Underground mining activities will take place within 100m from a watercourse and within 500m of a delineated wetland and could
impede or divert the flow of water in a watercourse.
Structural and Equipment Damage: Risks to infrastructure from subsidence or ground vibrations caused by blasting operations.

2. Request for Confirmation of Mitigation Measures
We request that SRPM provide a written undertaking detailing:

Which of the recommended mitigation measures (as identified by your environmental experts) will be implemented in the future.
Which measures have already been implemented to address the reported risks.
This includes, but is not limited to:

Sealing of water-bearing features using chemical grouts.
The establishment of alternative water supplies or well fields.
Regular monitoring of groundwater levels and quality.
Specific blasting vibration limits and safety protocols.

3. Guarantee for Compensation
If the recommended mitigation measures prove unsuccessful, we request an unconditional guarantee that SRPM will compensate our client for any damage or loss suffered.
because of the mining operations.

4. Undertaking Regarding Groundwater Recovery Post-Mining
Once mining operations in Blocks A and B cease, we request an unconditional written undertaking that SRPM will implement the necessary steps recommended by experts to allow the groundwater levels to recover. This includes, amongst others, sealing shafts and other measures to prevent mine water decant and ensure aquifer restoration.

5. Request for Monitoring and Management Plan
We ask that you provide us, within 10 days, with:
a copy of the Monitoring and Management Plan referred to by your environmental consultants in their minutes dated 6 November 2024. This plan is critical to ensuring that all risks are proactively managed and mitigated.
</td><td>5 December 2024</td><td>Email</td><td>
<u>Reiteration of Our Client's Concerns</u>

A response on the groundwater depletion, recovery and water quality has been included on the response above.
A response on Subsidence and Blasting has been included above.
In terms of activities undertaken within the regulated area, A Freshwater Assessment was commissioned as part of the Basic Assessment Process to identify and delineate watercourses with the Study area. The Freshwater assessment forms part of the Basic Assessment Report. The study identified that mining activities will boarder a Channelled Valley Bottom Wetland. Due to the mining activities situated adjacent to the delineated watercourse (within the DWS regulated area), a Water Use License Application for a Section 21 c & i activities in terms of the NWA has been applied for. The study revealed that based on the Present Ecological State and Ecological Importance and Sensitivity of the wetland. Due to the significant invasion of alien vegetation and modification of the hydraulic regimes, the CVB wetlands were assessed to be in a seriously modified (Category E) ecological condition and of low/marginal ecological importance and sensitivity. The proposed mining activities are expected to pose a low risk to the wetland provided that mitigation measures are adhered to.

<u>Request for Confirmation of Mitigation Measures</u>
The Geohydrological Assessment has identified the potential impact on groundwater levels which includes BH1. The mitigation measures as provided in the geohydrological assessment have been included as part of the Basic Assessment Report and Environmental Management Programme. Reference is made to some of these mitigation measures:

"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".
This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project.
"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".
SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense.
"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".
According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.
"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".
As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B.
"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".

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Comment	Date	Source	Response
• a transcription of the meeting that was recorded **6. Insurance Cover:** We explained our client's predicament in our letter of 26 November 2024. We need a proposal from you as to how you envisage dealing with the problem.			○ *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* ○ *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* It should be emphasised that these mitigation measures are not only approved by the two Competent Authorities (DMPR & DWS), but the conditions of an authorisation and license also include external and internal audits for adherence to the mitigation measures. Other than the above mentioned, SRPM undertakes water quality monitoring as per the approved WUL for the existing operations. Blast and vibration monitoring is also undertaken. The operations also have a cover drilling procedure in place which covers most aspects of water bearing features A Ring cover drilling is done, and it includes drilling holes into the feature and then pumping special grout for sealing. **<u>Guarantee for Compensation</u>** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **<u>Undertaking Regarding Groundwater Recovery Post-Mining</u>** Refer to the above regarding the findings of the groundwater assessment. Other than the mitigation measures as recommended by the independent specialist. SRPM has compiled an Environmental monitoring and management Plan. The management measures provided in the plan include the following: • Seal and grout the mine and ensure water does not flow into mine workings • Leave pillars around the boreholes to protect the boreholes • Replace affected boreholes • Investigate water supply alternatives The monitoring action plan is as follows: • Sibanye-Stillwater to monitor water levels to ensure management actions, should levels drop • Water quality to be monitored in all the identified boreholes
1. Noted that SS has not issued written confirmation of what recommended measures will be implemented or a plan, should mitigation measures be inadequate or insufficiently implemented. 2. The insurance provider has indicated that no coverage from loss or damages incurred as a result of mining activity will be provided to the company. What assurance can be provided to Euro Sales to navigate the loss of insurance coverage as a direct result of the proposed mining expansion project. 3. Regarding the matter of insurance that the broker or company that Euro Sales utilizes is subject to change, however, the principal remains the same; due to the mining activity, Euro is unlikely to receive coverage for loss or damages as a result. ER asked that ES receive coverage from SS for the replacement value of any damages incurred to the property as a result of SS's mining activity 4. Requested SS provide assurances to Euro Sales, should Euro Sales suffer from loss or damages as a result of the mining activities. 5. SS should be able to provide assurance readily if the risks to Euro Sales property are as minimal as stated by SS. 6. The main engagement with SS is to gain assurance that the mitigation measures will be applied	**12 December 2025**	Teams Meeting	Following the meeting held on 12 December 2024, a response was provided to Euro Sales and Le Roux Eckaard Attorneys by SRPM on 19 December 2024.
We act on behalf of Euro Sales Manufacture (Pty) Ltd, the factory's owner for structural steel products, fabrication and light engineering, situated at 7 Chroom Crescent, Industrial Area, Rustenburg (approximately 1 km from the proposed mining expansion area). In terms of the applicable legislation we, on behalf of our client, wish to submit an objection to the formal applications of Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for:	**13 December 2024**	Email	<u>Acknowledgment of the Objection</u> Alta van Dyk Environmental Consultants acknowledges the objection raised in terms of the Application. As part of the Environmental and Water Use Authorisation process, the objection will be included in the Final Basic Assessment report as well as the Water Use License Application for consideration by the Competent Authorities (DMPR and DWS) in the decision-making process. <u>National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)</u>

Comment	Date	Source	Response
• The proposed amendment or variation of mining right NW30/5/1/2/2/80MR, as detailed in the Draft Basic Assessment Report (DBAR) whereby the existing Approved Mining Right Area will be expanded; and • the application for a water use licence in terms of the applicable legislation which application is necessitated by the fact that waste rock will not be brought to the surface and will be packed underground, i.e. backfilling of the proposed UG2 Shallows Mining blocks A and B will take place. Our client acknowledges the public participation process initiated by the environmental assessment, but they have significant concerns regarding the environmental, operational, and legal implications of the proposed (expanded) mining activities. Basis of the Objection 1. National Environmental Management Act (NEMA), 1998 (Act 107 of 1998) • Section 2(4)(a) of NEMA requires that environmental management prioritises sustainable development and ensures that adverse environmental impacts are minimised. • The DBAR fails to adequately address the potential long and short-term environmental impacts on groundwater resources in the area generally and specifically in respect of our client's aforesaid borehole which is currently their only source of water for their manufacturing operations, including drawdown and contamination risks to our client's factory borehole (BH1). • Section 24 of NEMA mandates that all activities affecting the environment must follow an integrated environmental management approach, which appears lacking in the current assessment, particularly with respect to any undertaking by SRPM to implement the mitigation measures for groundwater impacts as recommended by their technical experts. 2. National Water Act (NWA), 1998 (Act 36 of 1998) • Section 27(1)(b) of the NWA requires that the needs of current and future water users be considered in water use license applications (WULA). The proposed expansion fails to adequately ensure that sufficient groundwater resources will remain available for industrial use by our client. • Section 19 imposes a duty on the mine to prevent pollution of water resources, but the mitigation strategies for potential contamination risks remain vague in the DBAR. 3. Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002) • Section 2(h) of the MPRDA requires mining operations to promote equitable access to mineral resources while minimising adverse impacts on the environment and communities. The proximity of the proposed mining area to our client's factory places them at an increased risk of environmental and operational harm. 4. Other Legislation • There is also other legislation that applies [see DBAR p34-35]. If any rights are granted, they should be made subject to compliance with such legislation (to be confirmed under oath by the CEO of SRPM) before construction is allowed to commence. Client's General Concerns The application for expansion of the existing mineral rights includes an area (the block southeast of the proposed mining Blocks A and B) where no mining is proposed for the said area. The environmental sensitivity of this area ranges from Very High to High and Medium in respect of themes like Aquatic biodiversity, Archaeological and cultural heritage and Terrestrial biodiversity (Very High); Agriculture and Civil Aviation (High) and Animal species and Palaeontology (Medium) [see Table 7 on p12 of the Draft Basic Assessment Report (DBAR)]. Because of this degree of sensitivity and the fact that no mining is proposed for that area, no expansion to that area should be allowed. In fact, no case has been made out to justify any expansion beyond Blocks A and B.I f the			The legislated obligation in terms of the proposed project is acknowledged. The Basic Assessment Process has been undertaken in terms of the NEMA EIA Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The Geohydrological Assessment was made available as part of the Basic Assessment Report. Euro Sales was informed of the availability of the report on the 13 November 2024. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources (from a short- and long-term perspective). The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The in-depth questions that have been put forward, specifically around BH1, have been addressed as part of this submission and included below. The Geohydrological Assessment has identified the potential impact on groundwater levels which includes BH1. The mitigation measures as provided in the geohydrological assessment has been included as part of the Basic Assessment Report and Environmental Management Programme. Reference is made to some of these mitigation measures: • *"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".* o This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project. • *"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".* o SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. . A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense. • *"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".* o According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL. • *"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".* o As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B. • *"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".* o *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* o *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* Emphasis should be made that these mitigation measures are not only approved by the two Competent Authorities (DMPR & DWS), but the conditions of an authorisation and license also includes external and internal audits for adherence to the mitigation measures. <u>National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)</u> SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. BH1 does form part of the existing hydrocensus, and pump testing is currently underway. These are critical aspects in the development of the baseline data which will motivate and support the evaluation of alternative water source requirements in the future. Response with regards to water quality and management thereof has been provided below.

Comment	Date	Source	Response
Minister is inclined to grant the expansion of the mineral rights, we suggest that a further desktop study is necessary to assess the impacts and if necessary, also a field assessment. Client's Specific Concerns A number of potential medium to high impacts (relating to the impacts on groundwater, and ground vibration) have been identified that are associated with the operational and closure phases of the expanded mining activities. • Groundwater Impact: ○ The proposed mining operations pose a significant risk of groundwater depletion and contamination, which could directly affect our client's borehole, BH1, a critical water source for their industrial processes. ○ Simulations predict a drop in the water level at BH1 by approximately 19.92 meters due to mining activities. If this happens, BH1 may completely dry up, making it unusable. Based on the extent of the simulated groundwater level drop, the risk to the hydrocensus boreholes was assessed (Table 7.1 of the Geohydrological Impact Assessment – Appendix C4 to the DBAR). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole are highlighted in red. This assessment shows that over time many of the boreholes may dry up. ○ The Groundwater Level Recovery will take approximately 15 years to fully recover post-closure, assuming no decant. Appendix C to the Geohydrological Impact Assessment shows a simulated Groundwater Level Recovery for BH1 of 51 years. ○ The water table in the area is expected to drop as mining progresses, affecting BH1 and other nearby boreholes. [Table 7.1 p. 52] ○ The test results for Monitoring Borehole BH5 (the closest to BH1) show likely contamination that would exceed the permitted levels in respect of certain elements (which is indicative of impacted water) [Table 31, p 96]. The DBAR also recognises that the "backfilled underground workings will at some point begin to decant because of an increase in recharge. The water may be of poor quality and high in nitrate content and therefore pose a contamination threat to the underlying groundwater." [p. 105] ○ It is further recognised that there is a medium to high risk that post-closure management activities may result in contamination of water within the receiving environment, and subsequent reduction in water quality (increase in salts and specific contaminants of concern and reduced pH) [Table 35, p. 112]. ○ The proposed mining activities at the suggested depth may: • disrupt the aquifer supplying the borehole. It is also to be noted that the expanded underground mining activities will take place within 500m of a Channeled Valley Bottom Wetland (CVBW)and 100m from the closest watercourse. The operation of the underground mining area related to the undermining of the north--eastern CVBW is described as a medium to high potential of creating a cone of depression, which may drain water from the CVB wetland, thus resulting in desiccation of the wetland [p. 107, Table 34]. • cause structural damage to the borehole, compromising its functionality. The operation of the underground mining area related to the undermining of the north-eastern CVBW is described as a medium potential of destabilising the surrounding environment through the extraction of ore with a subsequent potential subsidence of the land [p. 107, Table 34]. cause the borehole to dry up. In this regard, the DBAR states on p103 as follows: "The change in groundwater level at the end of an assumed 5-year mining period is shown in Figure 45. The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 60 m. The extent of the impact is within a radius of 1 km from the edge of the mining block. Based on the extent of the simulated groundwater level			A Water Use License Application (WUL) is underway with the Department of Water and Sanitation. The WUL when issued by the Department of Water and Sanitation comes with its own conditions that needs to be adhered to by the applicant. This includes monitoring frequencies, parameters and auditing requirements. There is a multifactorial legislative network which the SRPM will need to be compliant to. Other than the mitigation measures provided in the DBAR and WUL, Sibanye Stillwater commits to compliance with the monitoring and management plan as well as the establishment of the environmental monitoring committee. This information will be made available to the DWS as part of the decision-making process. <u>Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002)</u> The Basic Assessment Process has identified the potential impacts on the receiving environment. Mitigation measures have been assigned to the identified potential impacts which has been included in the Environmental Management Programme for submission to the DMPR for decision making. According to the independent specialist assessments, with the implementation of the correct mitigation measures, the site has possibility of mitigating any potential adverse environmental impact through the implementation of mitigation measures. All potential impacts have a significance score of medium to low. Other than the Environmental Monitoring Committee (yet to be established), Sibanye Stillwater has a grievance procedure in place whereby the I&APs are able to raise concerns and complaints for close out. Section 5A of the MRPDA refers to the requirement of Environmental Authorisation. In addition, a Regulation 17 application in terms of the Mine Health and Safety Act was submitted on 12 September 2024. The application is for the undertaking of mining within the 100m Regulated Area. The application was accompanied by a Risk Assessment. <u>Other Legislation</u> The project has an overall holistic approach in terms of ensuring that the Kwezi shallows project is authorised under all relevant and applicable legislative requirements prior to the commencement of the project. Each applicable legislation governs the required approach to obtain authorisation as well as set forth requirements for compliance auditing and consequences for non-compliance. Sibanye Stillwater will be guided under this various legislation in terms of how responsibilities and commitments are approached. <u>Compliance with Environmental and Water Laws</u> The proposed project triggers a Basic Assessment Process in terms of the National Environmental Management (Act 107 of 1998), Environmental Impact Assessment Regulations (2014). A Geohydrological Assessment has been commissioned as part of the Basic Assessment Process. The scope of the assessment was to identify the potential impacts of the mining activities on the groundwater resources. The Euro sales borehole (BH1) has been documented and assessed as part of the geohydrological assessment study. The Geohydrological study was made available as part of the Draft Basic Assessment report. The Draft Basic Assessment was made available for public and Commentary Authority review from the 14 November until 13 December 2024. A Water Use License application is currently underway (WUL reference: WU 36938). The WUL application takes into consideration the geohydrological assessment and the impacts as identified by the independent specialists. Potential impacts on the aquifer and adjacent boreholes have therefore been included in the impacts assessment and mitigation measures have been assigned. **<u>Groundwater Impacts</u>** This has been addressed in detail above. <u>Climate Change</u> The global continuous emitting of greenhouse gases is likely to increase the mean global surface temperature resulting in heavy precipitation events, sea level rise and unpredictable weather conditions. From a country perspective South Africa is warming at twice the global rate and as such, the frequency, intensity and unpredictability of extreme weather events may increase in the coming years. It should be noted that while the Kwezi Shallows Underground expansion will have a direct and indirect contribution to greenhouse gas emissions, it is not the only contributor in the area. With this being said, Sibanye Stillwater remains a dedicated partner in the transition to a low-carbon future, given that they invest in green metals; these are metals needed for renewable energy (solar and wind), batteries, and hydrogen. This is encapsulated in their strategic differentiator: Unique global portfolio of green metals and energy solutions that reverse climate change. The Group sustainability strategy calls for (i) building a climate change resilient business, and (ii) data-driven and considered decision-making. Sibanye Stillwater supports the global response to climate change in two primary ways: by reducing their own carbon footprint and by delivering those commodities needed to mitigate carbon emissions. Sibanye Stillwater's climate change and energy and decarbonisation position statements are aligned with the International Council on Mining and Metals (ICMM's) climate change commitments, to SDGs 7 and 13, and to the UNFCCC (United Nations Framework Convention on Climate Change) Paris

Comment	Date	Source	Response
drop, the risk to the hydrocensus boreholes was assessed (Table 33). The boreholes in which the groundwater level can potentially drop below the bottom of the borehole are highlighted in red. This assessment shows that over time many of the boreholes may dry up." BH1 is marked red in Table 33 on p 103. The potential lowering of the groundwater level is regarded as the most significant risk associated with the project. It has the potential to impact private groundwater users, who are solely reliant upon groundwater as their only source of water; • the reactive rock may result in the potential formation of acid mine drainage; and possible leachate formation which could impact the water resources. Proper management and treatment of leachate are therefore crucial to prevent environmental pollution. ○ Without this water supply, our client's operations will be severely impacted, potentially leading to significant financial losses. ○ The DBAR does not sufficiently address the feasibility or reliability of alternative water sources. ○ Aquifer Impact: Weathered Aquifer. [p12 of the Geohydrological Impact Assessment]: The finding is that the borehole's reliance on a shallow aquifer makes it susceptible to disruptions caused by mining, including reduced water availability and quality. ○ Potential for Mine Water Decant: In the worst-case scenario many of the boreholes that will be dewatered will remain dry after closure. Sealing of the low-lying shafts may be considered as a mitigating measure not only to prevent decant, but also to allow the mine water level to rise and the affected boreholes to recover. ○ Water Quality: Mining activities, particularly waste rock interactions, might degrade water quality, introducing contaminants or altering the hydrochemical balance. [p 34 and p 57] The most significant post-closure risk that may impact the groundwater regime is: • Reduction in the groundwater levels. [Risk Medium -High Table 7.4 on p 58]. The potential lowering of the groundwater level is regarded as the most significant risk associated with this project. It has the potential to impact private groundwater users, who are solely reliant upon groundwater as their only source of water. ○ SRPM concedes that the effects of climate change were not considered. However, it is acknowledged that " this might exacerbate the anticipated reduction in water inputs and the resultant hydrological function of the watercourse beyond the extent of the proposed development." [BBAR - p15]. We submit that this acknowledgement alone necessitates a specialist report to provide more detailed information on the extent of the anticipated reduction in water inputs and any design controls and mitigation measures that can be implemented to manage and/or reduce these impacts. ○ Structural and Operational Risks: The vibrations and subsidence from mining activities could damage our client's factory infrastructure and equipment. No detailed vibration management plan has been provided. ○ Inadequate Mitigation Measures: • The DBAR proposes general design controls and mitigation measures but lacks specific commitments, guarantees, undertakings, indemnities or implementation timelines that SRPM is prepared to give. • Also, our client's current insurance policy excludes damages arising from earthquakes arising from mining activities, leaving them financially exposed in the event of loss/damage being suffered because of the expanded mining activities. No indemnity has been provided/offered to our client (on a replacement value basis) for any loss/damages to the borehole, factory, or associated infrastructure caused by the expanded mining activities of SRPM.			Agreement. Sibanye-Stillwater was one of 28 international mining and metals companies that committed to the new ICMM climate change position, announced ahead of COP26 (November 2021), which includes a commitment to net zero by 2050. In 2023 an A-score for the CDP submission was obtained and for the 2023 CDP water management submission a BBB MSCI ESG rating was obtained. Sibanye Stillwater achieved the benchmark of limiting GHG emissions to the 2023 normalised threshold of 6.8 tCO2e (scope 1 & 2). **Structural and Operational Risks** This aspect has been addressed above **Specific Blast Vibration Limits and Safety Protocols** The mine has set standards for drilling and blasting practices that are employed in the operations. Blasting is undertaken as per a blast design. Blasting protocols for the operations are three blasts a day at set specific times. The blast lengths in this project have been reduced to 2.0 m maximum for the specific project and a lower density explosive will also be utilised to reduce the effects of blast vibrations. An 8milli second delay will be deployed to ensure that shot holes are not fired concurrently that could increase the PPV's during blasting. The blast vibration limits that will be deployed in the project area are as per the USBM limits. See Table 5.1 page 21 Kroondal West, Blast and Stability Assessment. Liability in terms of Mining Activities SRPM is investigating options to address the matter and they we will reach out as soon as we have information. Commitment to Mitigation Measures The mitigation measures as detailed in the specialist reports have been included as part of the EMPr. SRPM has committed to the implementation of a monitoring and management plan together with the establishment of an environmental monitoring committee whereby the monitoring results will be discussed with Interested and Affected Parties and the mitigations measures put forth. Such has been included in the BAR and EMPr. Should the DMPR issue a positive decision, the BAR and EMPr will thus represent a legally binding document which warrants compliance. External Environmental audits will be undertaken on an annual basis. The mitigation measures are supported by management plans that are developed by relevant specialists in the fields and frequently updated to ensure that it remains relevant to site and reaching environmental objectives. The WUL application is a parallel process also being undertaken. The WUL includes conditions that are legally binding to the applicant and associated external audits to monitor compliance. Groundwater management plan Other than the mitigation measures as recommended by the independent specialist, SRPM has compiled an Environmental monitoring and management Plan. The management measures as provided in the plan include the following: • Seal and grout the mine and ensure water does not flow into mine workings • Leave pillars around the boreholes to protect the boreholes • Replace affected boreholes • Investigate water supply alternatives The monitoring action plan is as follows: • Sibanye-Stillwater to monitor water levels to ensure management actions should levels drop • Water quality to be monitored in all the identified boreholes Monitoring and reporting The hydrocensus boreholes (as Eurosales) will not be monitored on a monthly basis as these boreholes are noted as an equipped borehole which could result in damages to the infrastructure. For this reason, SRPM has identified five monitoring boreholes that will be used for operational monitoring. These boreholes provide a representation of the sample area. The monitoring results will be presented through the established environmental monitoring committee. The proposed operational monitoring boreholes has also been included in the WUL application to the DWS. The EMPr monitoring is set by the EA to be issued. Monitoring and reporting will be undertaken accordingly, based on the conditions set forth in the EA. The frequency as stated has been recommended in terms of compliance auditing and has subsequently been recommended in the BAR.

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD, a subsidiary of ALTA VAN DYK CORPORATE GROUP
Registration Number: 2011/059764/23/Vat No: 4630259952

Comment	Date	Source	Response
Requests for Clarification and Action **1. Commitment to Mitigation Measures:** Our client requests that SRPM commits in writing to all mitigation measures outlined in the DBAR and provides an Environmental Management Programme (EMPr) spelling out what control and mitigation measures will be put in place together with suitable guarantees and indemnities to our client's satisfaction regarding the issues raised herein, and a detailed timeline for the implementation of suitable control and mitigation measures. **2. Comprehensive Groundwater Management Plan:** Provide a detailed plan outlining how groundwater resources will be monitored and protected throughout the operational and post-mining phases. **3. Guarantees for Compensation:** Our client seeks an unconditional guarantee that any damages or losses resulting from the mining operations, including groundwater depletion or structural damage, will be fully compensated. **4. Unconditional Undertaking for Post-Mining Recovery:** Ensure that after mining ceases in Blocks A and B, all necessary steps will be taken to restore groundwater levels and minimize environmental impacts, as required under NEMA and NWA. **5. Monitoring and Reporting** ○ As a condition to any environmental authorisation granted, it must be stipulated that internal environmental compliance audits on the EMPr must be undertaken annually, and the resultant audit reports must be submitted to the DMPR and to our client. External environmental compliance audits on the EMPr must also be undertaken every two years by an independent EAP and a copy of the external audit report must submitted to the DMPR and our client. ○ Our client's borehole must be monitored by SRPM monthly for damage, water quality and borehole level and the report must be made available to our client. **6. Financial Provision** ○ Sect 24P of the National Environmental Management Act (NEMA), requires the submission of financial provisions for rehabilitation, closure, and post-closure management of environmental impacts for mining activities. SRPM asks for an exemption and provides a motivation (Appendix E). Our client submits that the motivation is inadequate and that a further bank guarantee should be provided for an additional amount to the satisfaction of DMPR for the following reasons: • SRPM's motivation that the expansion will utilise existing infrastructure and thus not significantly increase surface disturbance does not align with the spirit of the law. This law exists to ensure that mining companies adequately cover the costs of rehabilitating the environment after mining operations have ceased, regardless of the perceived insignificance of additional disturbances. • SRPM has not provided current data or assessments to substantiate that the existing financial guarantee of R214,704,579.72 remains adequate against the backdrop of the proposed expansion. Mining economics are volatile, and the costs associated with environmental rehabilitation can escalate due to unforeseen contamination or structural changes necessitated by expanded operations; • There is no indication that the existing financial provision has been updated or increased to reflect current or future potential costs directly related to the areas now proposed for inclusion under the mining right. This is critical as the expansion could uncover new			In terms of the provision of the audit report, such request can be discussed further in the Environmental Monitoring committee. <u>Financial Provision</u> Note of importance: Financial provision is undertaken on an annual basis, all new activities and potential impacts are assessed annually as part of the liability assessment and adjusted accordingly. Specialist studies are conducted where needed to inform decisions made on costs. A pre-application meeting was held with the DMPR on the 21 May 2024. Due to the fact that there is no surface infrastructure as part of this application and a financial guarantee is updated and submitted to the DMPR on an annual basis, the DMPR advised that a motivation stating such must be submitted as part of the application for consideration by the DMPR. The motivation provided was as per the pre-application meeting held with the DMPR on 31 May 2024. The basis of the motivation was that no surface infrastructure forms part of this application and therefore no quantification was required. The existing infrastructure forms part of the existing closure liability assessment, which is updated annually, and the existing Kwezi Closure liability has been deemed relevant and standing. Reference is made to 2002; it is unclear where that date has been sourced from. The amount provided for the entire mining right area was based on the 2023 assessment costs. The guaranteed sum is R214 704 579.72. of the total sum ~ R53.1 million has been allocated to Kwezi. The guarantee was submitted to the DMPR in 2024 and the guarantee date reference is 10 April 2024. The 2024 assessment has been completed and currently subject to an external audit. Once completed the top-up will be determined and adequate provision made as required by legislation. The closure liability assessment for the Kwezi Mining Right is conducted annually as per the legislative requirement. As the expansion is underground, no additional infrastructure is required on surface which means that all existing infrastructure (as per the Kwezi Property inventory) is accounted for. Included in the assessment is to apply a demolition cost for all infrastructure within a mining right, which SRPM is currently doing. SRPM goes the extra mile and even includes infrastructure on the surface right boundary should it fall out of the MR. The potential impact on groundwater is assessed annually and remediation costs (if needed) are adjusted based on the outcome of the assessment and included in the assessment. It is important to note that Rehabilitation costs are allocated for the entire disturbed footprint. New buildings are added annually as part of the assessment (if applicable) and rehabilitation allowances adjusted accordingly. Following the comments on 13 December 2024, a response was provided to Euro Sales and Le Roux Eckaard Attorneys by SRPM on 19 December 2024.

Comment	Date	Source	Response
environmental challenges that were not accounted for in the original financial provisioning; • The original financial guarantee was presumably established in 2002. Given the inflationary pressures and changes in environmental rehabilitation technologies and requirements, it is unlikely that a guarantee set nearly two decades ago would suffice for future rehabilitation needs, particularly when the mining area and volume of operation are to be expanded; • Even if the expansion utilises existing infrastructures, such as the Kwezi shaft, the increased extraction of resources is likely to pose additional risks to local ecosystems. This can include increased risk of water pollution, borehole and habitat destruction, and potentially irreversible biodiversity loss. Such impacts necessitate a re-evaluation of the financial provisions to ensure they are commensurate with the potential damage and the costs of mitigating such impacts; • The closure objectives aim to integrate the post-mining landscape with regional land uses and promote biodiversity. Expanding mining operations without adjusting financial guarantees could jeopardize these objectives, especially if financial resources fall short in addressing more extensive rehabilitation needs; • The impact on water quality and catchment yield must be reassessed in light of mining expansion. The current financial provision may not adequately address the potential for increased water use, contamination, and the need for more extensive water purification and management strategies post-closure; • The motivation provided by SRPM for not enhancing the financial guarantee in light of their expansion underplays the potential for increased environmental impact. It does not adequately safeguard against the financial risks of insufficient rehabilitation funding. DMPR must enforce a thorough reassessment of the financial guarantees in place, ensuring they are sufficient to cover the real costs of rehabilitating the mine to a state that supports sustainable post-mining land use and adheres to environmental protection standards. This reassessment should be guided by current environmental evaluation and future risk anticipation rather than historical financial provisions that may no longer be adequate. We urge you and your client to carefully consider these objections and take appropriate actions to mitigate the significant risks posed by the proposed expansion. Should the mitigation measures prove inadequate or fail to address our client's concerns, our client reserves the right to pursue further legal action to protect its interests. We look forward to receiving a written response addressing these concerns within 10 business days.			
Subject: Response to Assurance Letter Regarding Kwezi Shallow Operations We acknowledge receipt of your letter dated 20 December 2024 regarding the Kwezi Shallows Operations and thank you for your engagement on this matter. However, we note with concern that your response fails to adequately address several critical aspects	**17 January 2025**	Email	<u>Groundwater Impacts and Borehole mitigation</u> • The findings of the groundwater impact assessment have been included above.

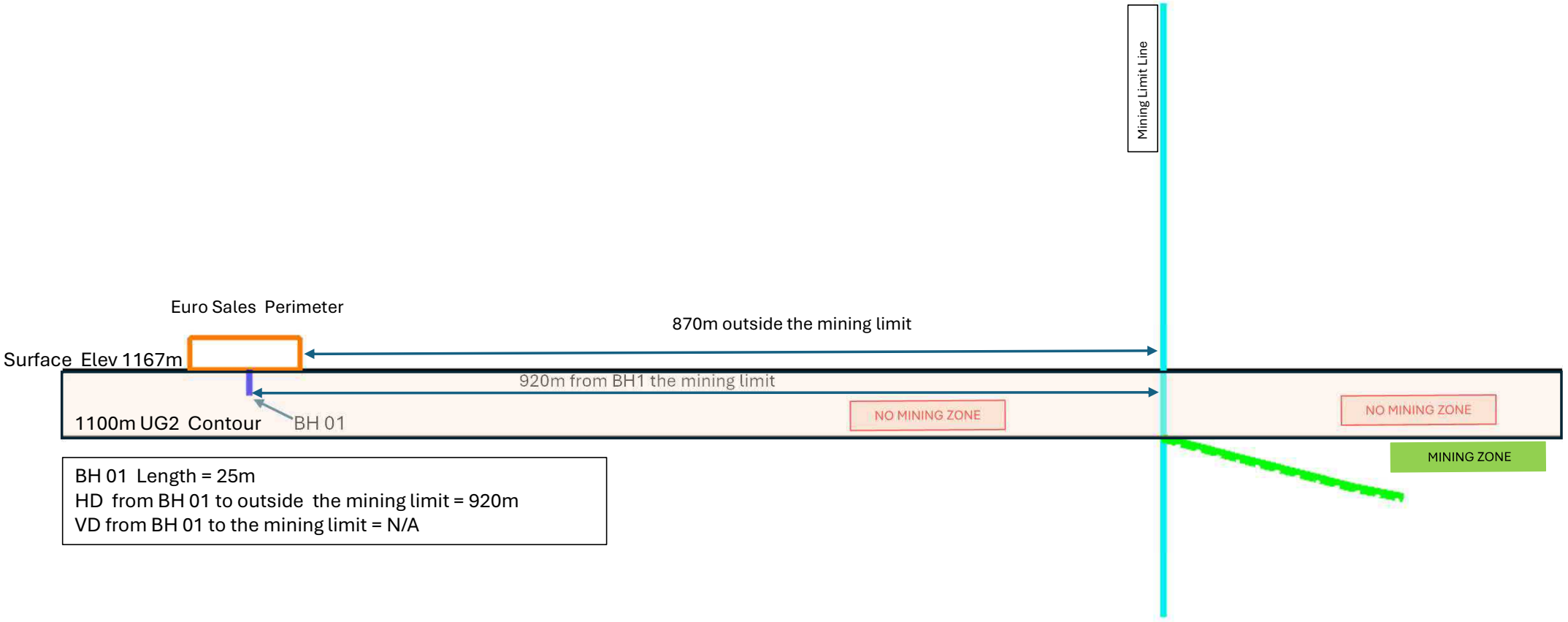
ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD, a subsidiary of ALTA VAN DYK CORPORATE GROUP
Registration Number: 2011/059764/23/Vat No: 4630259952

Comment	Date	Source	Response
raised in our objection letter dated 13 December 2024 on behalf of our client, Euro Sales Manufacture (Pty) Ltd. Below, we outline the outstanding issues, deficiencies in your response, and seek further clarification and commitments. **1. Groundwater Impacts and Borehole Mitigation** You have assured that dewatering impacts will be minimized, with alternative water supplies offered subject to scientific investigations. However: • **Lack of Specificity**: No detailed timeline or methodology for these scientific investigations has been provided. • **Proactive Measures**: Your assurance fails to specify measures to prevent aquifer disruption. Our client reiterates the need for a hydrogeological assessment specific to their borehole (BH1). • **Water Supply Guarantees**: A clear and binding commitment to provide alternative water sources, including timelines and specifications, is required. **2. Structural and Operational Integrity** Your response states that subsidence and vibration monitoring will adhere to USBM standards. However: • **Vibration Management Plan**: No comprehensive vibration management plan or structural mitigation measures for our client's factory were provided. • **Indemnity for Structural Damage**: No undertaking to indemnify our client for damages to factory infrastructure caused by subsidence or vibrations has been offered. **3. Insurance and Financial Exposure** While you acknowledge potential impacts, your letter is silent on compensatory measures for our client's financial exposure due to exclusions in their current insurance policy. We require written confirmation that SRPM will indemnify our client for any losses, operational disruptions, or structural damages caused by mining activities. **4. Environmental Compliance** Your assurance of adherence to the Environmental, Social, and Governance (ESG) policy is noted. However, you have not addressed: • Whether the Environmental Authorization (EA) explicitly considers our client's property and borehole impacts. • Details on compliance with Section 24P of the National Environmental Management Act regarding financial provisioning for post-closure impacts. **5. Monitoring and Reporting** Your proposal for an independent monitoring committee is welcome. However: • **Committee Composition**: Clarity on its structure, decision-making authority, and the inclusion of our client's representatives is required. • **Regular Reporting**: A commitment to providing regular reports on borehole water quality, groundwater levels, and vibration impacts to our client is necessary. **6. Mitigation and Compensation Plans** Your letter lacks concrete commitments regarding the mitigation measures outlined in our objection letter, including: • Conducting a detailed assessment of the borehole and aquifer. • Establishing a timeline for implementing mitigation measures. • Providing written guarantees for compensation and alternative water sources. **7. Unaddressed Concerns** Several issues raised in our objection letter remain unaddressed, including: • Risks associated with mine water decant and acid mine drainage. • Contamination risks and long-term groundwater recovery timelines. • Inadequate financial provisioning for expanded operations and post-mining rehabilitation. **8. Request for Clarifications and Additional Information** We request clarity and further documentation on the following: • The scope and findings of the specialist investigations referenced in your letter.			• **Lack of Specificity:** A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risks for impact, ensuring alternative water is available when necessary. The investigation is ongoing and pump tests on the remaining hydrocensus boreholes have already commenced. The findings of the assessments will be presented to the Environmental Monitoring Committee (yet to be established). **Proactive Measures:** • *"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".* o This measure can only be undertaken once the DMPR and the DWS provide a positive decision on the application and therefore can only be implementable during the construction and operational phase of the project. • *"Should existing groundwater users be impacted upon, Sibanye Stillwater should replace the groundwater source by drilling new or deeper boreholes as an alternative water source".* o SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. . A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at SS expense. • *"Monitor boreholes for any water level changes together with precipitation as to assess the impacts on the groundwater level and the formation of a cone of depression. This water level monitoring data need to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement".* o According to existing approved WUL, SS has four compliance boreholes that are been monitored for water quality and water levels. Other than the existing monitoring boreholes, five additional operational monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL. • *"Existing boreholes from groundwater users should be surveyed and plotted on the mine plan (x,y,z). Pillars should be maintained around boreholes of existing water users that have been drilled deeper than the planned mining block as to protect these boreholes from being destroyed during the mining period".* o As part of the Geohydrological Assessment, a hydrocensus was undertaken. Sibanye Stillwater has already commenced with the exercise of undertaking pump tests at each of the identified hydrocensus boreholes. Sibanye Stillwater has compiled a monitoring and management plan, the inclusion of pillars to safeguard the boreholes has been included in the monitoring and management plan. This is only applicable to Boreholes in Block A and B. • *"Additional monitoring boreholes should be installed for the monitoring of water levels as to report on changes in the cone of depression and possible impact on the existing abstraction boreholes".* o *Five additional monitoring boreholes have been identified as part of the Geohydrological assessment. These boreholes have been included as operational monitoring boreholes as part of the WUL.* • *"Prior to the commencement of mining, the hydrocensus must be updated and water levels as well as abstraction volumes recorded to support baseline data and identify additional boreholes".* o *Sibanye Stillwater has already commissioned the updating of the hydrocensus. This includes pump testing of the already identified boreholes as well as an updated of any newly identified boreholes.* **Water Supply Guarantees** SS has taken a proactive investigation into potential alternative water sources to ensure sustainable water management. A comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact, ensuring alternative water is available when necessary. A risk to decline in the current environmental condition will serve as the trigger for drilling the existing borehole deeper at Sibanye Stillwater's expense. **Structural and Operational Integrity** The findings of the Blast and Vibration study has been detailed above. Other than the mitigation measures as recommended by the independent specialist. SRPM has compiled an Environmental monitoring and management Plan. The management measures as provided in the plan includes the following: Mitigation Action Plan • Follow recommended pillar and geometry mining span guidelines • Follow recommended support guidelines • Ensure vibration levels do not exceed guideline limits and achieve maximum vibration levels of 6 mm/s • Limit the length of round to 2.0m max at depths less than 50 m • Employ 8mm delay between shotholes

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Comment	Date	Source	Response
• Details of the proposed monitoring boreholes, including their locations and parameters to be monitored. • Specific measures to manage contamination risks from backfilled underground workings. • Updated financial guarantees in compliance with current regulations. Our client also informed us that someone named Ettienne, accompanied by an assistant, conducted a 12-hour test on their borehole. Unfortunately, the results of the test were not disclosed to our client. We shall appreciate it to receive a copy of the test results for our clent's records. **Conclusion** While we appreciate your willingness to engage constructively, we emphasize that our client requires binding commitments, specific mitigation measures, and transparent monitoring processes to ensure their property and operations are safeguarded. We request your detailed response to the above within **10 business days**. Failure to address these issues may necessitate our client exploring all available legal and administrative remedies. We shall also appreciate it if you could provide us (once it is ready for submission) of a copy of the Final Basic Assessment Report to be submitted to the DMPR			Monitoring Action Plan • Conduct house surveys to establish the baseline • Install continuous monitors in four points around the relevant areas • Monitor vibration levels continuously **Insurance and Financial Exposure/Guarantees** SRPM is investigating options to address the matter and they we will reach out as soon as we have information. **Monitoring and Reporting** The hydrocensus boreholes (as Eurosales) will not be monitored on a monthly basis as these boreholes are noted as an equipped borehole which could result in damages to the infrastructure. For this reason, SRPM has identified five monitoring boreholes that will be used for operational monitoring. These boreholes provide a representation of the sample area. The monitoring results will be presented through the established environmental monitoring committee. The proposed operational monitoring boreholes has also been included in the WUL application to the DWS. The EMPr monitoring is set by the EA to be issued. Monitoring and reporting will be undertaken accordingly based on the conditions set forth in the EA. The frequency as stated has been Recommended in terms of compliance auditing has been recommended in the BAR. In terms of the provision of the audit report, such request can be discussed further in the Environmental Monitoring committee. The committee composition will include SRPM Environmental and the Registered adjacent landowners. **Mitigation and Compensation Plans** • Mitigation measures and the progress this far has been detailed above. • Water supply Guarantees have been addressed above. **Unaddressed Concerns** These have been addressed above. **Request for Clarifications and Additional information** The Pump tests undertaken on the hydrocensus boreholes are currently underway. Once the study has been concluded such will be communicated to the landowners through the environmental monitoring committee. The details of the monitoring boreholes have been included as Figure 48 of the Basic Assessment Report. The parameters to be monitored will be aligned with the mines current operational monitoring programme which includes various parameters (Refer to Table 39 of the Basic Assessment Report). As part of this application SRPM is applying for a Section 21 g water use in terms of the NWA for the backfilling of the underground workings. A motivation for the GN704 Regulations in terms of the NWA. The rock formations at depth have poor primary porosity and low permeability. The rock itself is therefore suitable as the base prep. Permeability of the area increases where there are faults and joints present. It is through these features that the water in the deeper part of the aquifer flows. The area will be cleaned and mapped geologically to check the fracture frequency. If the fracturing is excessive, an alternative site with less fracturing will be identified to prevent any possible contamination. Conclusion It is our understanding that 10 working days is on the 31 January 2025. This submission was made on the 28 of January 2025. In terms of the FBAR, once submitted to the DMPR for consideration, the documents will be available on the AvDE website and registered Interested and Affected Parties will be informed of the submission.

Euro Sales



BH 01 Length = 25m
HD from BH 01 to outside the mining limit = 920m
VD from BH 01 to the mining limit = N/A



Kwezi Shallows: Environmental Management and Monitoring Plan



December 2024



1. Introduction

Sibanye Rustenburg Platinum Mines (SRPM) has undertaken a Section 102 application in terms of the Mineral and Petroleum Resources Development Act (MPRDA) to expand the Mining Right area of NW 30/5/1/2/2/80 MR ("Kwezi Project"). The proposed expansion area will be mined from Kwezi Shaft, , SRPM intends to mine only the UG2 Shallows Blocks (Blocks A and B) of the expansion area. Block A comprise of approximately 14 hectares, with an elongated rectangular footprint. Block B comprise of approximately 22 hectares in an elongated rectangle footprint. The targeted depth of the UG2 in Block A and B ranges between 40m and 80m.

As part of the Section 102 application for the Kwezi Project, Sibanye-Stillwater has appointed Alta Van Dyk Consultants (Pty) Ltd to conduct an environmental impact assessment and undertake a Water Use Licence (WUL) application. Both these processes are underway to secure the necessary environmental licences for the project.

2. Purpose of the Document

The purpose of this document is to outline the mitigation and monitoring plans for the project. The issues raised by Interested and Affected Parties (IAPs) have been taken into consideration during the development of the mitigation action plan in order to ensure environmental impacts are avoided and minimised.

3. Kwezi Project Environmental Management and Monitoring Plan

Table 1 outlines the material issues of concern and risks as identified during the environmental impact assessment and based on concerns raised by the stakeholders. The environmental and technical mitigation action plans are also outlined in Table 1.



TABLE 1: ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

ASPECT	ISSUE/RISK	MITIGATION ACTION PLAN	MONITORING ACTION PLAN	REPORTING
Groundwater	▪ Lowering of the water table impacting on surrounding boreholes ▪ Groundwater contamination resulting in poor borehole water quality	▪ Seal and grout the mine and ensure water does not flow into mine workings ▪ Leave pillars around the boreholes to protect the boreholes ▪ Replace affected boreholes ▪ Investigate water supply alternatives	o Sibanye-Stillwater to monitor water levels to ensure management actions should levels drop o Water levels to be monitored o Water quality to be monitored in all the identified boreholes	Monitoring Committee meetings
Blast and Vibration	▪ High vibration levels affecting structural integrity	▪ Follow recommended pillar and geometry mining span guidelines ▪ Follow recommended support guidelines ▪ Ensure vibration levels do not exceed guideline limits and achieve maximum vibration levels of 6 mm/s ▪ Limit the length of round to 2.0m max at depths less than 50 m. ▪ Employ 8mm delay between shotholes.	o Conduct house surveys to establish the baseline o Install continuous monitors in four points around the relevant areas o Monitor vibration levels continuously	Monitoring Committee meetings
Surface Subsidence	▪ Subsidence due to underground mining affecting structural integrity	▪ Follow recommended pillar and geometry mining span guidelines ▪ Follow recommended support guidelines	Install surface subsidence monitoring stations and continually monitor for surface subsidence.	Monitoring committee meetings.

Alta Van Dyk Environmental
Postnet Suite No. 745
Private Bag x1007
Lvttleton
1040

Date: 02 December 2024
Enquiries: K.N Mlambo

Tel: +27 14 565 1137

Email:WayleavesNWOU@eskom.co.za

Dear sir/madam

NOTICE OF BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT 80 MR FOR THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKSRUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE

Your Ref: DMRE Reference: NW30/5/1/2/2/80MR **Our Ref: NWOU-321-2024**

We refer to your letter received 13/11/2024.

This application indirectly affects our Eskom North West Operating Unit, The Eskom affected infrastructures on surface:

RUSTENBURG SMELTERS 88/33kV Substation; RUSTENBURG SHAFT / RUSTENBURG INCLINE 88kV Feeder; RUSTENBURG INCLINE / RUSTENBURG PLATS 88kV Feeder; RUSTENBURG COMPRESSOR / RUSTENBURG INCLINE 88kV Feeder; TRIDENT / PAARDEKRAAL 88kV Feeder

Eskom Distribution will raise no objection to the proposed application, provided Eskom's rights and services are acknowledged and always respected. The response is for the Environmental Impact Assessment process

1. There is 15,5 metres building and tree restriction on either side of the centre line of the 88kV kV power lines, which must be adhered to in all future developments. No construction work may be executed closer than 15,5 meters from any of Eskom's structures and or supporting mechanisms. The separation distance between parallel lines is 21m.

2. All work within Eskom Distribution reserve area and servitudes must be done in accordance with the requirements of the Occupational Health and Safety Act No.85 of 1993 as amended. Special attention must be given to the clearances between Eskom's conductors, structures, cables and electrical apparatus and the proposed work as stipulated by Regulation R15 of the Electrical Installations Regulations of the aforementioned Act or any other legal requirements. The requirements of the OHS Act must be adhered to in conditions where they are existing.

3. Eskom Distribution's services and equipment must be always acknowledged and may not be tampered or interfered with.

4. All work within Eskom Distribution reserve area and servitudes must be done in accordance with the requirements of the Occupational Health and Safety Act No.85 of 1993 as amended. Special attention must be given to the clearances between Eskom's conductors, structures, cables and electrical apparatus and the proposed work as stipulated by Regulation R15 of the Electrical Installations Regulations of the aforementioned, Act or any other legal requirement

5. The Applicants and Eskom's cables must be placed in sleeves encased in concrete across the width of the servitude, at the applicant's expense where frequent excavations occur in the cable area.

6. Eskom Distribution shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether because of the encroachment or of the use of the area where Eskom Distribution has its services, by the applicant, his/her agent, contractors, Employees, successors in title and assigns.

7. The applicant indemnifies Eskom against loss, claims or damages including claims pertaining to interference with Eskom Distribution services or apparatus or otherwise. The applicant's attention is drawn to section 27(3) of the Electricity Act 1987, as amended in 1994, which stipulates that the applicant can be fined and/or imprisoned as a result of damage to Eskom's apparatus.

8. No mechanical equipment, including mechanical excavators, high lifting machinery and drilling equipment, may be used within Eskom's reserve area, or within close proximity of Eskom's services and equipment, without prior permission in writing and supervision of Eskom's authorised area manager for the **NWOU Technical Service Centre Area; Teboho Sewisa e-mail: SewisaTM@eskom.co.za (Tel.: + 27 18 464 6724) Customer Network Services Supervisor: Bheki Nxele e-mail: NxeleB@eskom.co.za (Tel.: +27 14 565 1214)**

9. Permission must be obtained at least 10 (ten) working days prior to the commencement of any work within the reserve area.

10. Eskom Distribution shall at all times have unobstructed access to and egress from its services.

11. It will be required of the applicant to familiarise him/herself with all safety hazards related to electrical plant.

12. Eskom's consent will not relieve the applicant from obtaining the necessary statutory, land owner or municipal approvals. (Eskom is not the landowner).

13. Any third-party servitudes encroaching on Eskom servitudes shall have to be registered against the property at the applicant's own cost.

14. The ineffective management and handling of waste is of crucial importance. No dumping shall be allowed within Eskom Distribution Servitudes. All unwanted waste (gaseous, liquid or solids) should be disposed of at a registered waste disposal site as stipulated under Section 20 of the Environmental Conservation Act (Act 73 of 1989).

15. No blasting is permitted. If blasting is needed, an additional application is to be lodged with Eskom Distribution.

16. Any development, which necessitates the relocation of our services, will be to the account of the developer. For the relocation of any services, please contact Eskom Customer Services at **Eskom Contact Centre**: **086 00 37566**.

17. Eskom will recover costs from the applicant where any damages of Eskom assets and or any penalties suffered by Eskom occur.

Should the applicant or his contractor damage any of Eskom services during commencement of any work whatsoever, then Eskom's 24 hour Contact Centre Tel: **086 00 37566** must be notified immediately to report the incident.

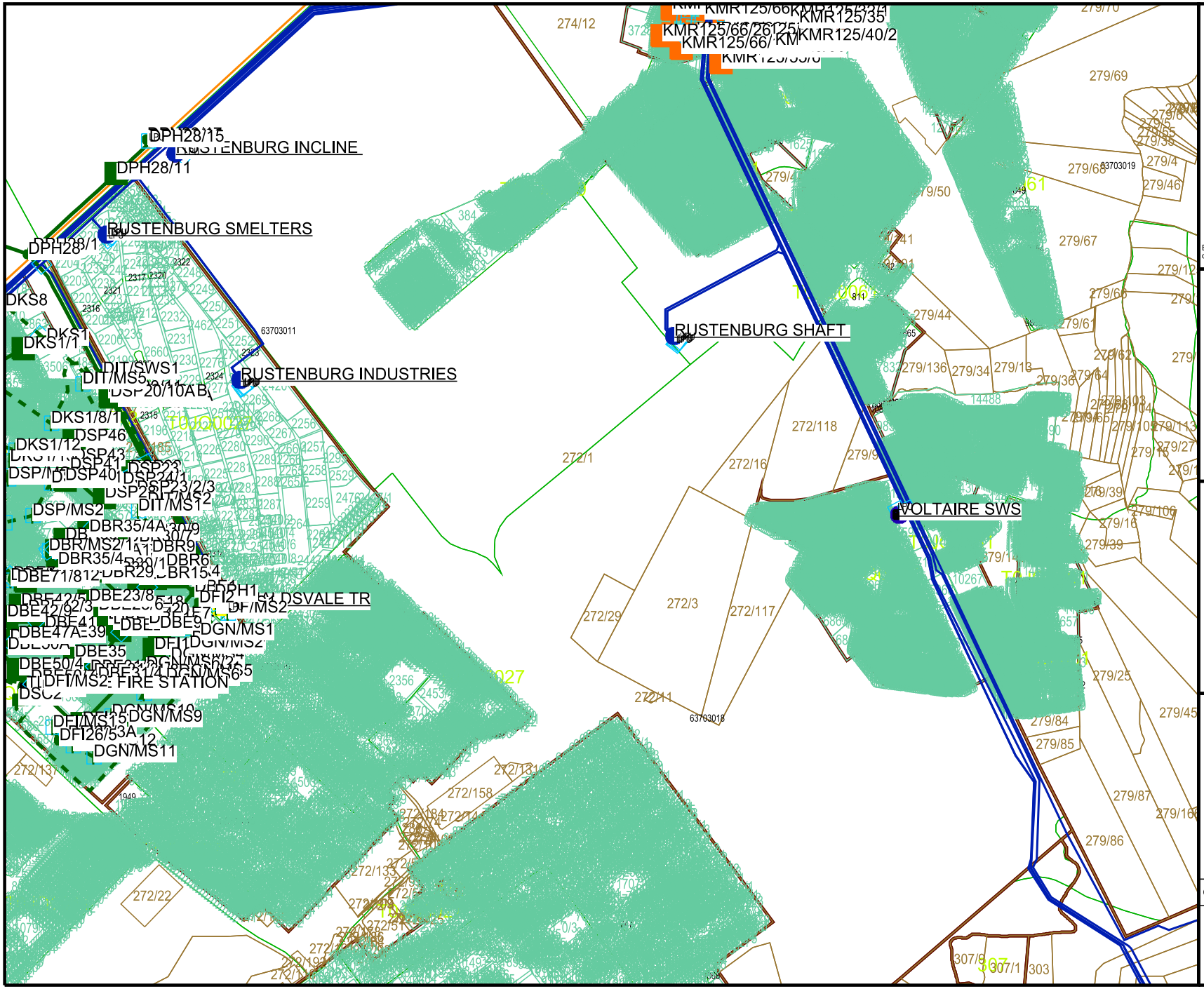
We thank you and hope you will find the above in order.

Yours faithfully
Katlego Mlambo



……
For: Belinda Jonasi
LAND DEVELOPMENT MANAGER.

Eskom Distribution (GEMMA)
Asset Creation I Land Development I Land & Rights Section
Eskom Dx Area Office I 14-16 Kgwebo Street I Mabe Park | Rustenburg, 0299
Tel +27 12 I www.eskom.co.zaNorth West OU (GEMMA CLUSTER)



Wayleave Sketch

Project Number:

The route depicted by:

Map Number:

Eskom Distribution is not responsible for any errors in the information displayed on this map.

Owner: _____

Witness: _____

Witness: _____

Date: _____ /_____/_____

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Date: _____ /_____/_____

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Compiled by: MotlhaKN

Date: 2024-12-02

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public works & roads
Department:
Public Works and Roads
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

Modiri Molema Road
Old Parliament Complex
Mmabatho, 2735
Private Bag X 2080, Mmabatho,

CHIEF DIRECTORATE: TRANSPORT INFRASTRUCTURE

DIRECTORATE: PLANNING AND DESIGN

Tel.: +27 (18) 388 1398
Email: Sitase@nwpg.gov.za
Enq: K A Sitase

Ref: R42_1-1-3-1_80 MR_Sibanye RPM

ALTA VAN DYK CORPORATE

Private Bag X1007

Lytttleton,

1040

For attention: **Mabirimisa Consulting and Projects (Pty) Ltd**

SUBJECT : **COMMENTS/ CONSENT IN TERMS OF ACT NO 21 OF 1940 AND ROADS ORDINANCE NO 22 OF 1957 AS AMENDED: NOTICE OF CONSULTATION BASIC ASSESSMENT AND WATER USE LICENSE APPLICATION PROCESS FOR THE PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION PF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A & B) SITUATED IN RUSTENBURG LOCAL MUNICIPALITY, NORTH WEST PROVINCE**

AFFECTED PROVINCIAL ROAD (S)	:	D108_010
MUNICIPALITY	:	RUSTENBURG LOCAL MUNICIPALITYLOCK
TOWN/ TOWNSHIP/ FARM	:	AS PER ATTACHED LOCALITY MAPS
REGISTRATION NUMBERS	:	NW30/5/1/2/2/80 MR
CLIENT(S)/ APPLICANT	:	SIBANYE RUSTENBURG PLATINUM MINES (PTY) LTD (SRPM)

Your Notice Letter dated **30 September 2024** has reference. The comments/ consent are issued in terms of the **Advertising on Roads and Ribbon Development Act, Act No 21 of 1940** and the **Roads Ordinance No 22 of 1957, as amended.**

There is no objection to the proposed development, subject to the strict adherence of the attached Specific and Special Conditions and should form part of the proposed planning/ development, also that the conditions/requirements listed below are imposed and met in all respects by the applicant:

NOTE : A written confirmation of acceptance of the attached conditions is required. In the event of not receiving a written acceptance of conditions, the approval is withdrawn and this approval is cancelled.

Yours faithfully

DIRECTOR : PLANNING AND DESIGN

DATE 14/10/24

Mr. MSL NTLATLENG

GENERAL CONDITIONS FOR THE PROPOSED DEVELOPMENT

NB : This wayleave is granted in favour of: **SIBANYE RUSTENBURG PLATINUM MINES (PTY) LTD (SRPM).**

1. EXISTING AND FUTURE/ PLANNED PROVINCIAL ROADS

The existing and future/ planned provincial road(s) should be excluded from the proposed development(s). For more information see the attached **Locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM**.

2. ACCESS TO THE PROPOSED DEVELOPMENT

The existing access(es) to the affected land i.e. **Locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM** will be utilised/ used for the above-mentioned development(s).

No additional access (es) will be allowed to Provincial Road(s) **D108_010** at all, without the written approval of the Controlling Authority (Department of Public Works and Roads).

3. NOTIFICATION TO THE DEPARTMENT

The ***Department of Public Works and Roads*** **(dpwr)** should be notified (with appropriate detailed plans) about any of the intention or planning and before the commencement thereof of the following: -.

a. Construction of Permanent or Temporary Access(es) from any of the Provincial roads.

b. Construction of any structures e.g. Buildings along the any of the Provincial roads.

c. Closing and or Deviation of section(s) of the Provincial roads.

d. Erection of Advertisement along the Provincial roads.

e. Working inside the Road Reserves of any of the Provincial roads.

f. Temporary or Permanent Closure of Traffic on either of the affected roads.

g. Erection and or Construction of Overhead and or Underground Services e.g. Water & Sewarage pipe lines, Electrical and Telephone Cable Lines across or parallel to the provincial roads.

h. Trees, Shrubs, Cultivated Grass, Gates or Road Fencing, and or any Road Signage and Furniture to be removed or damaged within the Provincial Road Reserve. If such assets are removed or damaged you will have to replace them to the entire satisfaction of the **Department of Public Works and Roads**.

4. BUILDING LINE

Except where the approval has been granted for services crossing and or development along the provincial road (s), it may be in terms of **Section 9 of the Advertising on Roads and Ribbon Development Act (Act 21 of 1940, as amended)** not to be laid nearer than **95m** from the centre line of the Road Reserve or within a **500m** radius measured from the centre line of the junction of a building restriction Road Reserve (except a National/ Municipal and or Private road), without the specific permission of the **Department of Public Works and Roads**.

*For any **SPECIAL/ SPECIFIC CONDITIONS** see **Clause 5** below.*

5. SPECIAL/ SPECIFIC CONDITIONS FOR THE PROPOSED DEVELOPMENT

Your proposed development is hereby granted subject to the strict adherence of the conditions/requirements listed below and all Safety Measures by the applicant/ and or his contractors/ suppliers:

a. ABNORMAL TRUCKS/ EQUIPMENTS

Department of Public Works and Roads should also be notified with any of the intention of **transporting abnormal trucks/ equipments** on any of the above stated provincial road(s).

b. BLASTING/ EXPLOSIVE OF ROCKS

Any unstable conditions encountered or any rock requiring blasting to be reported directly and immediately to the *Departmental Roads Engineer/ Manager*.

Blasting to be done in accordance with the current applicable Explosives Regulations (e.g. Act No 26 of 1956) and possible damage to the road must be excluded as far as possible.

Any damage to the road caused by unstable soil conditions (subsidence, etc.) or blasting must be repaired to the satisfaction of the*: Departmental Roads Engineer/ Manager.*

c. INDEMNITY OF THE PREMIER AGAINST CLAIMS

i. You indemnify the **PREMIER OF NORTH WEST** and exempt him from any claim or damage which may be instituted or suffered by any person, including legal costs, as a result of the laying or erection of any service or any other works caused or erected by you, or as a result of negligence on your part to protect or maintain the service or other works caused by any other person unless you can prove negligence on the part of Department of Public Works, Roads and Transport or its officials.

ii. The Department of Public Works and Roads will not be liable for any damage suffered by the applicant as a result of the development, operations carried out on road construction or road maintenance or any other operations whatsoever, unless negligence on the part of Department of Public Works, Roads and Transport or its officials can be proved.

iii. The applicant shall indemnify the Department of Public Works and Roads or its officials and workers against any claims arising out of any death of or injuries to any person or damage to any property whatsoever (including services such as water pipes, telephone and or electric cables, etc,) caused by or resulting from the activities of the applicant in the road reserve.

d. ROAD RESERVE WIDTHS OF THE AFFECTED PROVINCIAL ROADS

Provision must be made for the following road reserves/ streets and must be excluded from the proposed development:

i) Road **D108_010** with the road reserve width of about **62m**

e. BUILDING LINE RELAXATION

The *Department of Public Works and Roads (DPWR)* is hereby grant the **minimum relaxation of the building** line from the **Standard 95m** as stated by **Clause 4: Standard Building Line** above as follows.

Also see the attached *Sketch Plans Road Reserve Width(s)*.

i. **Road Reserve Width of 62m** : The Building Line Relaxation is **45m** from the centre of the Road Reserve; *(i.e.* **15m** ***from road reserve boundary***).

f. LAND USE ALONG THE ROAD(S)

i. No structure (Poles, Struts, Stays, Manholes, etc.) will be erected and or allowed inside any of the provincial road reserve(s), without the approval from this Department indicating the correct location/ position of the proposed development.

ii. Land use of even build on the lines of no access shall be in accordance with the requirements of Executive Committee Resolution 1112 of 26 June 1978.

iii. The applicant shall not erect/ built either permanent or temporarily structures, and or any informal structures along the above-mentioned provincial roads inside the road reserve until he has obtain written approval from the Deputy Director General: Department of Public Works and Roads (Dpwr) to do so

6 REPONSIBILITY FOR THE COST OF (ACOUSTIC SCREEING) NOISE BARRIER

The applicant shall be responsible for any costs involved in the erection of Acoustic Screening (Noise Barrier).

7 ACCEPTANCE AND DISPOSAL OF STORM WATER

7.1 In terms of **Section 84 of the road Ordinance, 1957**, the applicant shall arrange the drainage of the proposed development(s) in such way that it fit in with the drainage of the **affected provincial Road (s)**, taking into account the capacity of the system.

7.2 The applicant/ local authority or whoever responsible for the drainage of the proposed development(s) shall receive and dispose all the storm water running from the road or being diverted from the **affected** road(s).

7.3 The state or the Provincial Administration will not be responsible for any damage caused by arising from such storm water.

7.4 Where, in the opinion of the Deputy Director General: Department of Public Works and Roads, the system for the above-mentioned road(s) is too small to cope with any increased volume of the storm as a result of the establishment or proposed development(s), the applicant/ local authority (whoever responsible for the drainage) shall be responsible for the cost of installing a larger drainage system for the affected provincial Road(s).

7.5 The applicant/ local authority or whoever responsible for the drainage of the proposed development(s) shall built/ construct the drainage scheme at own cost simultaneously with the construction of the access (es).

8. PARKING

No parking shall be allowed in the road reserve of the provincial road **D108_010.**

9. PROPERTY RIGHTS/ SUCCESSOR-IN-TITLE

The **conditions of this wayleave are applicable to you** as well as **your successor-in-title** (*where applicable*). If property rights of your service be transferred to any other person or institution, **it will be your responsibility to bring the contents of this wayleave to the attention of your successor-in-title** as the conditions of this wayleave together with your property rights will be transferred to your successor-in-title and will still be applicable.

10. THE RIGHT TO WITHDRAW THIS PERMISSION

The North West Provincial **Department of Public Works and Roads** reserve the right to withdraw this permission immediately and to remove/ demolish the proposed development if any of the preceding conditions are not complied with; and it is also reserve the right to alter or revoke these conditions at any time.

11. VALIDITY PERIOD

The work must be done within twelve months from the date of this Approval Letter. If for any reason at all, the work is delayed for a longer period, extension of time must be requested in writing or a new application will have to be submitted.

12. This comments/ consent is issued/ granted in terms of the Advertising on Roads and Ribbon Development Act (Act 21 of 1940, as amended) and the Roads Ordinance (Ordinance 22 of 1957, as amended) and its Regulations; and **does not exempt you from the provisions of any other law.**

It will be appreciated if you would kindly ensure that all the above conditions are included in the proposed and intended development(s). Should you have any question and or clarification in regard to the above-mentioned, please do not hesitate to contact this Department.

Yours faithfully

DIRECTOR : PLANNING AND DESIGN

Mr. MSL NTLATLENG

DATE 14/10/24

Attached : Typical Plan No: **NWP 3/2; 3/3; 3/4 & 5 /1**

: **Kwezi_Property_Map_Potrait_Rev1 & 2**

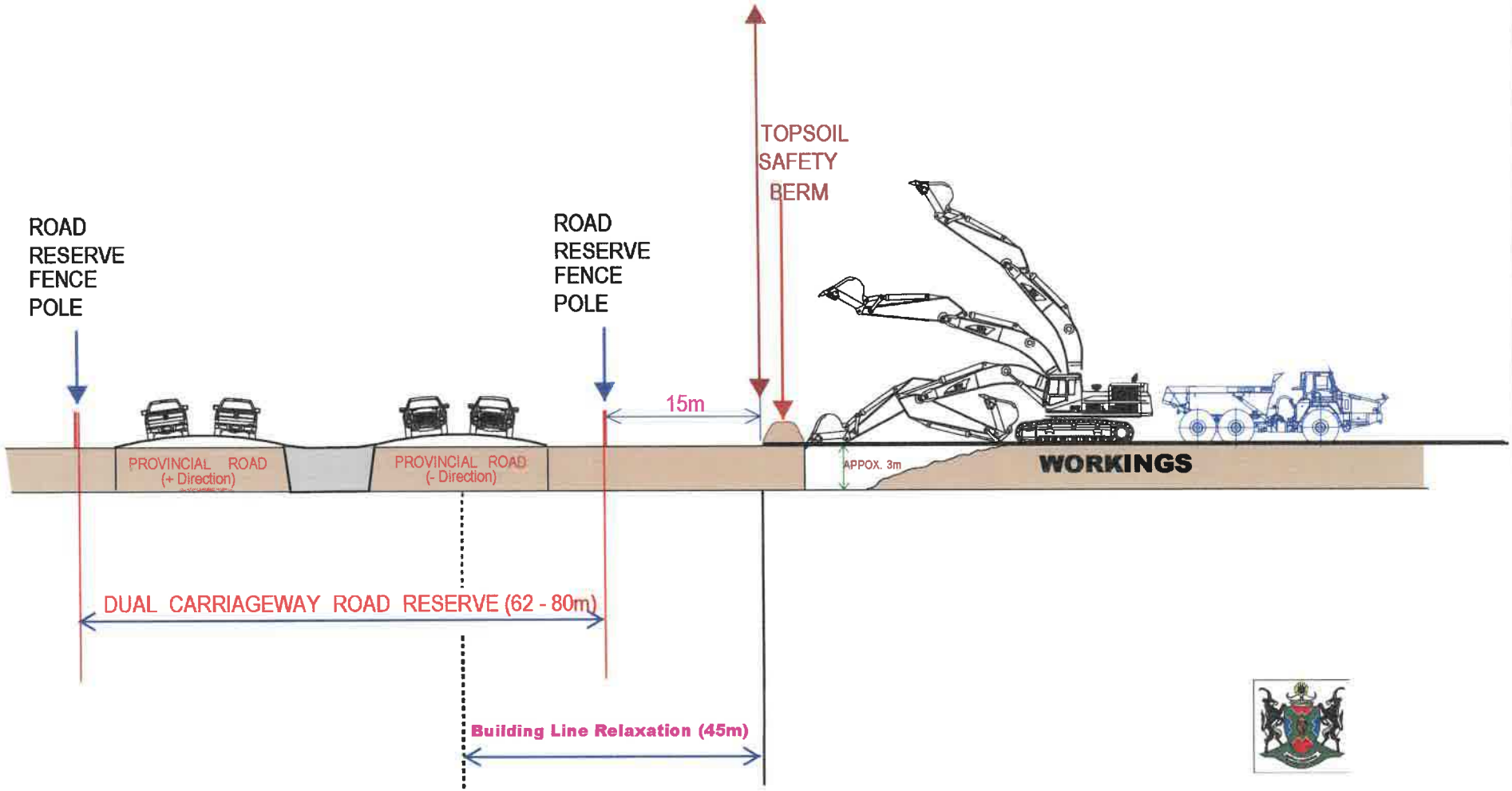
: **Google_NW 30-5-1-2-2_80 MR_Sibanye RPM**

: **Locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM**

: **Sketch Plan_62-80m Rd Reserve Building Line Relax_Mining**

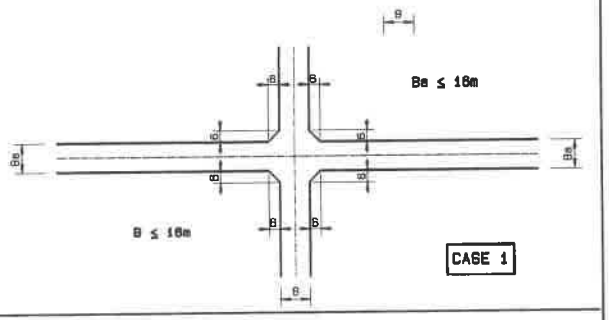
MINIMUM BUILDING LINE RELAXATION

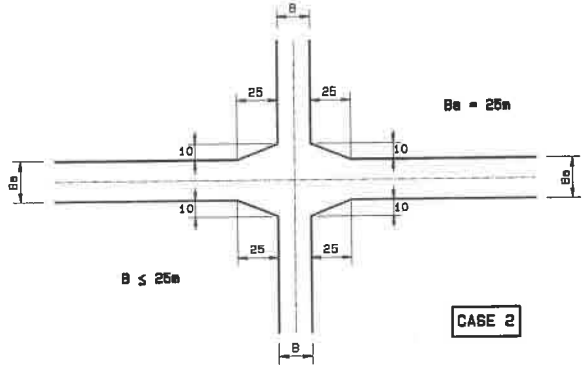
FILLING STATION ALONG PROVINCIAL DUAL CARRIAGEWAY ROAD

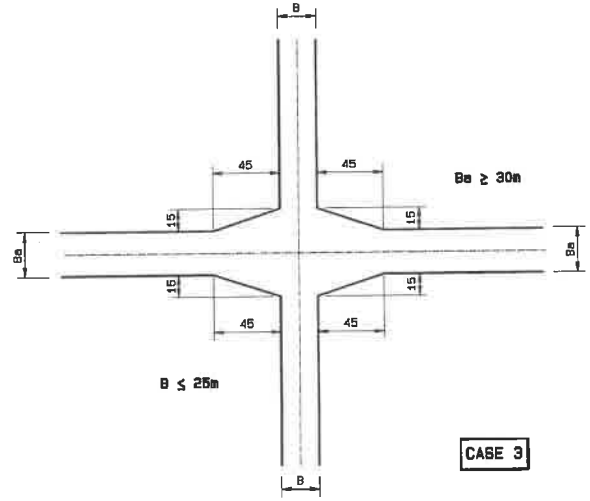


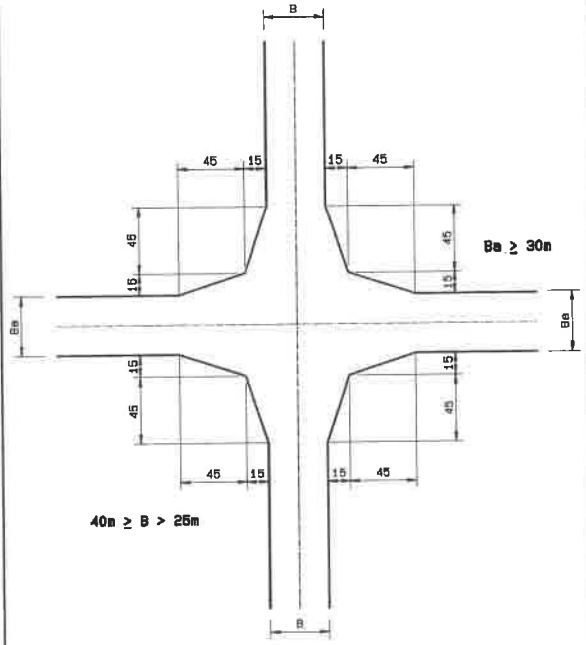
NORTH WEST PROVINCE

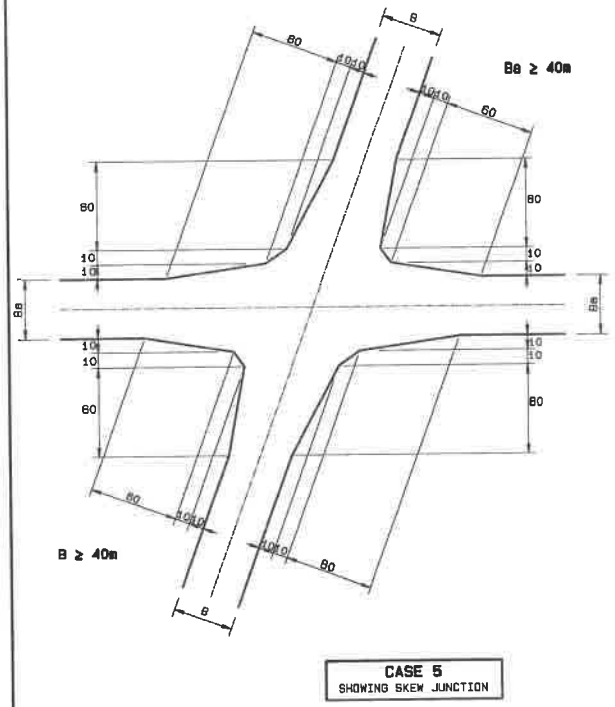
Department of Public Works and Roads











APPLICATION OF DIFFERENT CASES

JUNCTION ROAD (B) — MIN ROAD RESERVE WIDTH (m)	MAIN ROAD (Ba) 8	16	25	30	40	48,4	62
8	1*	1*	2	3	3	3	3
16		1*	2	3	3	3	3
25			2	3	3	3	3
30				4	4	4	4
40				4	4 (5) **	4 (5) **	4 (5) **
48,4					4 (5) **	5	6
62					4 (5) **	5	5

* MINIMUM SPLAY SHOULD BE 6m x 6m (SYMMETRIC). THE REQUIREMENT IS THAT A SU+T VEHICLE MUST BE ACCOMMODATED UNLESS THE LOCAL AUTHORITY REQUIRES OTHERWISE.

** CASE 5 ONLY TO BE USED WHEN BOTH ROADS ARE DUAL CARRIAGEWAY ROADS.

NOTES:

1. WHERE APPLICABLE, CASES 1 AND 2 SHOULD BE DETERMINED IN CONSULTATION WITH THE LOCAL AUTHORITY.
2. THE DESIGN VEHICLE TO DETERMINE THE TURNING MOVEMENTS AT JUNCTIONS (EXCLUDING TO INDUSTRIAL AREAS) SHOULD BE A SU+T VEHICLE (R=14m) AND WHERE NECESSARY THE ROAD RESERVE MUST BE ADJUSTED ACCORDINGLY. FOR JUNCTIONS TO INDUSTRIAL AREAS A SU+2T VEHICLE MUST BE USED. IN ALL CASES THE REQUIRED SPACE MUST BE MAINTAINED BETWEEN THE TOE-LINE AND THE ROAD RESERVE BOUNDARY.
3. ROAD RESERVE SPLAYS MUST PROVIDE FOR ROAD SIGNS, ADDITIONAL LANES AND DRAINAGE AS REQUIRED.

SCALE ON REDUCED DRAWING

100mm ON ORIGINAL DRAWING

No.	DATE	AMENDMENTS	N.W.P.

Department of Roads and Public Works
North West Province
Directorate: Roads

TYPICAL DETAILS OF ROAD RESERVE SPLAYS AT INTERSECTIONS

APPROVED BY

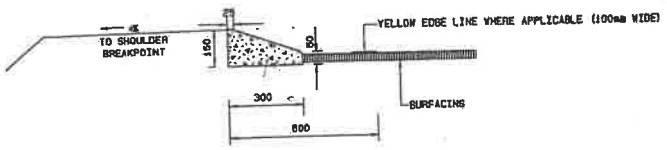
for HEAD OF DEPARTMENT

Date: ——————

SCALE
N T S

SHEET 1 OF 1 SHEET

PLAN No: NWP 5/1

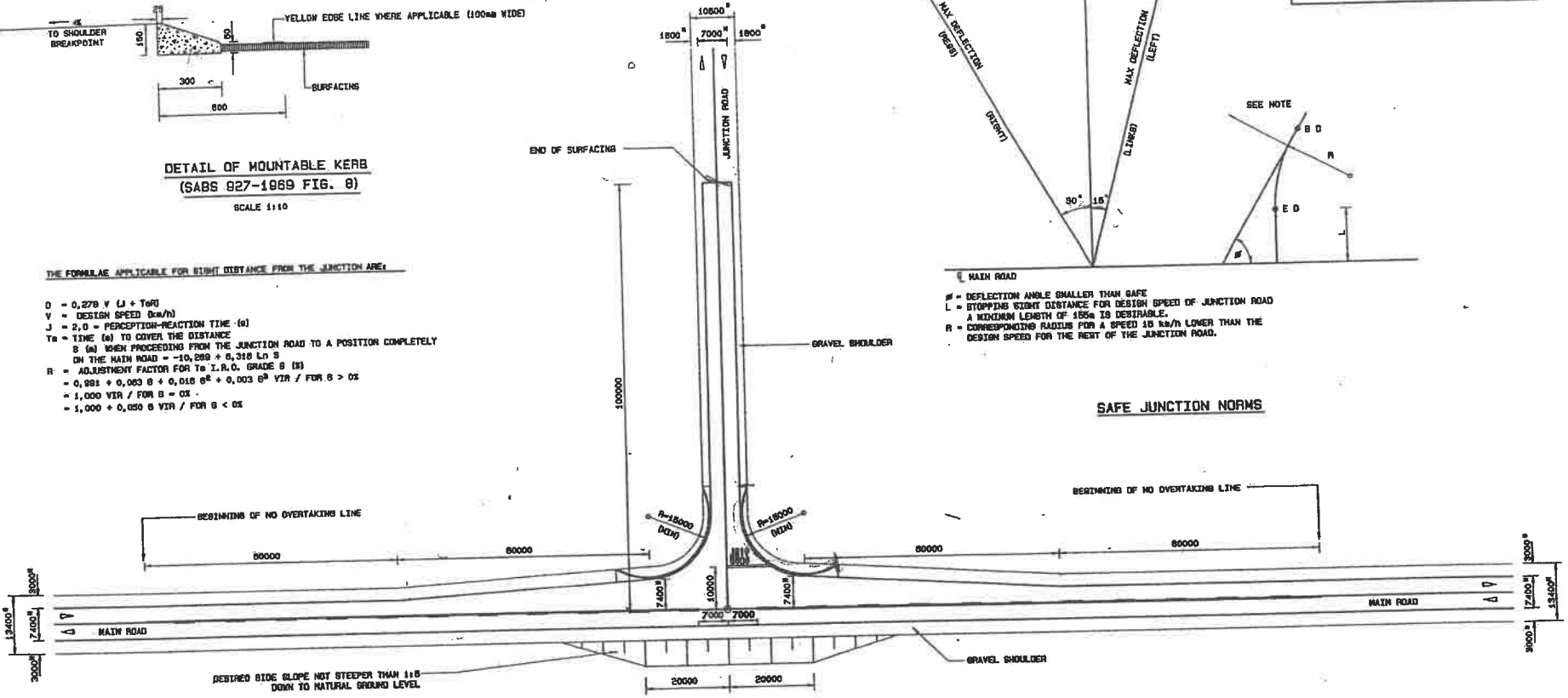


DETAIL OF MOUNTABLE KERB
(SABS 927-1969 FIG. 8)

SCALE 1:10

THE FORMULAE APPLICABLE FOR SIGHT DISTANCE FROM THE JUNCTION ARE:

D = 0,278 V (J + TaR)
V = DESIGN SPEED (km/h)
J = 2,0 = PERCEPTION-REACTION TIME (s)
Ta = TIME (s) TO COVER THE DISTANCE S (m) WHEN PROCEEDING FROM THE JUNCTION ROAD TO A POSITION COMPLETELY ON THE MAIN ROAD = -10,289 + 6,318 Ln S
R = ADJUSTMENT FACTOR FOR Ta I.R.O. GRADE G (%)
= 0,991 + 0,063 G + 0,018 G² + 0,003 G³ VIR / FOR G > 0%
= 1,000 VIR / FOR G = 0% .
= 1,000 + 0,050 G VIR / FOR G < 0%



ø = DEFLECTION ANGLE SMALLER THAN 60°
L = STOPPING SIGHT DISTANCE FOR DESIGN SPEED OF JUNCTION ROAD A MINIMUM LENGTH OF 155m IS DESIRABLE.
R = CORRESPONDING RADIUS FOR A SPEED 15 km/h LOWER THAN THE DESIGN SPEED FOR THE REST OF THE JUNCTION ROAD.

SAFE JUNCTION NORMS

NOTE:
THE CROSSFALL ON THE OUTSIDE OF THE CURVE SHOULD PREFERABLY NOT EXCEED 1:8 FOR AT LEAST 10m MEASURED FROM THE OUTSIDE EDGE OF THE CARRIAGEWAY.

TABLE No 1	
DESIGN SPEED (km/h)	SIGHT DISTANCE (D) (m)
50	150
60	180
70	210
80	240
90	270
100	300
110	330
120	380

VALID FOR FLAT GRADES ≤ 3%

SEE NOTE 3

* WHERE APPLICABLE, CROSS SECTION DIMENSIONS ARE ADJUSTED ACCORDING TO THE APPROVED TYPICAL CROSS SECTION BEING USED, INCLUDING THE 7400-DIMENSION AT THE JUNCTION.

ROAD MARKINGS
FOR THE DETAIL ON ROAD MARKINGS REFER TO THE SOUTH AFRICAN ROAD TRAFFIC SIGNS MANUAL AND THE TYPICAL ROAD TRAFFIC SIGNS DRAWINGS SERIES.

NOTES:
1. GRADIENT ON BOTH ROADS SHOULD NOT BE MORE THAN 3%, ESPECIALLY NOT SO ON THE JUNCTION ROAD. SHOULD THE GRADIENTS EXCEED 3% THE REQUIRED SIGHT DISTANCE MUST BE ESTABLISHED FOR A HB 50 TYPE TRUCK AS PROPOSED IN "A POLICY ON GEOMETRIC DESIGN OF HIGHWAYS AND STREETS 1994". SEE FORMULAE.
2. THE SIGHT DISTANCE MUST BE MEASURED FROM AN EYE LEVEL OF 1,05m ON THE CENTRE LINE OF THE JUNCTION ROAD, 5m FROM THE EDGE OF THE NEAREST CONTINUOUS LANE OF THE MAIN ROAD, TO AN OBJECT HEIGHT OF 1,30m ON THE CENTRE LINE OF THE MAIN ROAD.
3. THE DESIRABLE MINIMUM SIGHT DISTANCE IS 300m. ANY DEVIATION MUST BE SUBMITTED, WITH FULL SUPPORTING MOTIVATION, TO THE LIAISON ENGINEER FOR A DECISION.
4. THE FEASIBILITY OF PROVIDING A PASSING LANE AND / OR A DECELERATION LANE ON THE MAIN ROAD MUST BE EVALUATED.
5. THIS PLAN SERVED AS A GUIDELINE ONLY. WELL MOTIVATED DEVIATIONS MAY BE CONSIDERED.

SCALE ON REDUCED DRAWING

in

100mm ON ORIGINAL DRAWING

No.	DATE	AMENDMENTS	N.W.P.

NORTH WEST PROVINCE
DEPARTMENT OF PUBLIC WORKS AND ROADS

T-JUNCTION OF NUMBERED GRAVEL DISTRICT ROADS WITH TARRED SINGLE CARRIAGEWAY ROADS

APPROVED BY

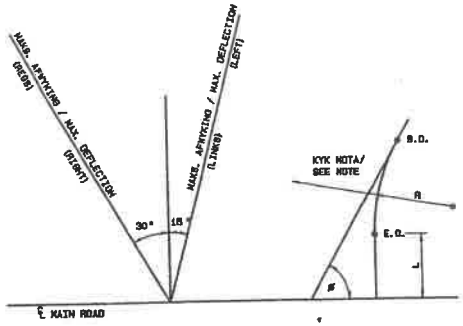
for HEAD OF DEPARTMENT

Date:

SCALE N T S

SHEET 1 OF 1 SHEET

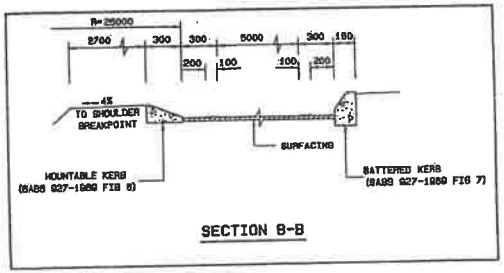
PLAN No: NWP 3/3



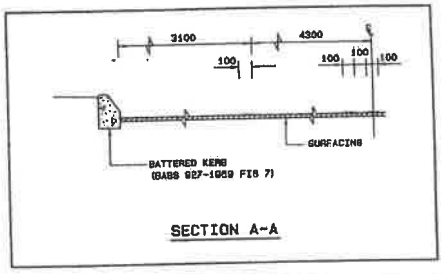
ø = DEFLECTION ANGLE SMALLER THAN SAFE.
L = STOPPING SIGHT DISTANCE FOR DESIGN SPEED OF JUNCTION ROAD. A MINIMUM LENGTH OF 150m IS DESIRABLE.
R = CORRESPONDING RADIUS FOR A SPEED 15Km/h LOWER THAN THE DESIGN FOR THE REST OF THE JUNCTION ROAD

SAFE JUNCTION NORMS

NOTE:
THE CROSSFALL ON THE OUTSIDE OF THE CURVE SHOULD PREFERABLY NOT EXCEED 1:6 FOR AT LEAST 10m MEASURED FROM THE OUTSIDE EDGE OF THE CARRIAGEWAY.



SECTION B-B



SECTION A-A

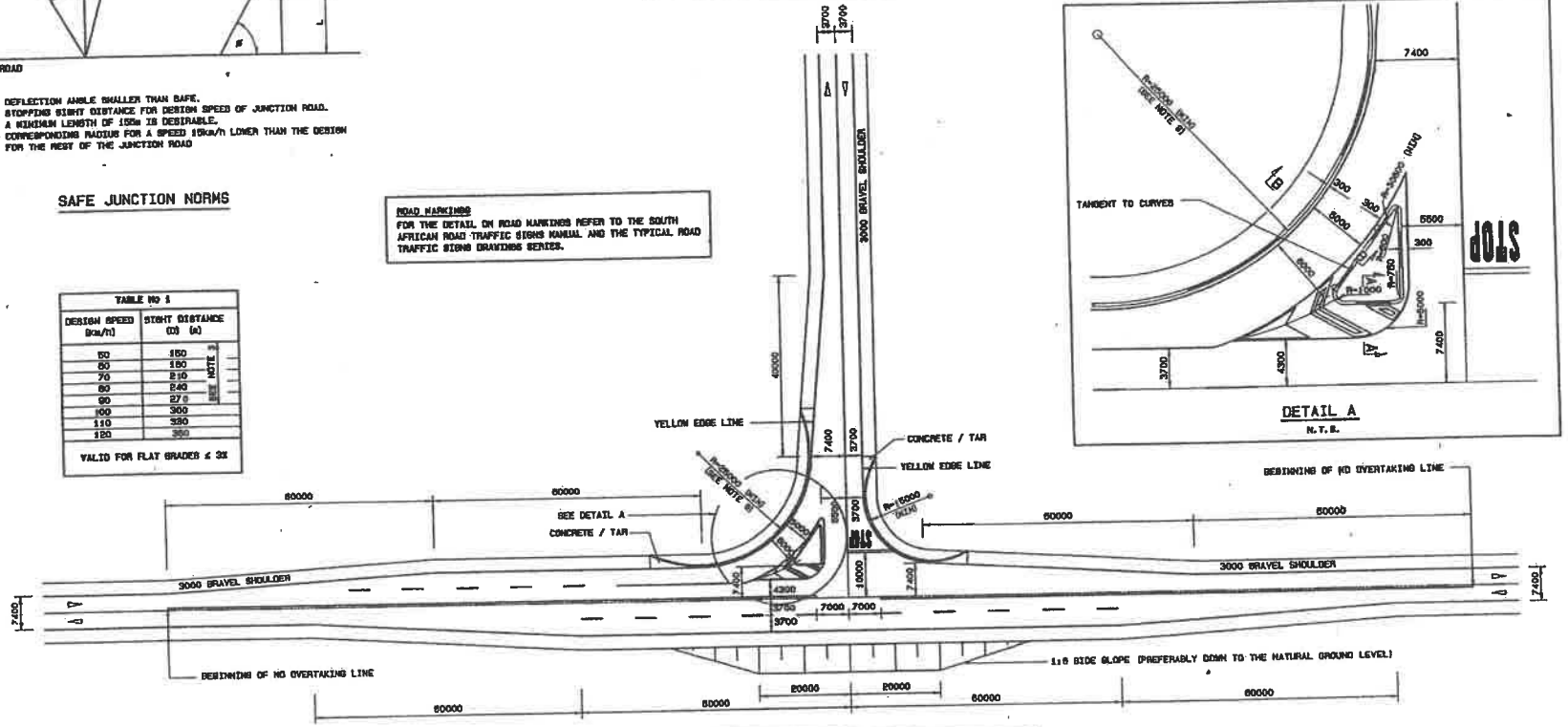
ROAD MARKINGS
FOR THE DETAIL ON ROAD MARKINGS REFER TO THE SOUTH AFRICAN ROAD TRAFFIC SIGNS MANUAL AND THE TYPICAL ROAD TRAFFIC SIGNS DRAWINGS SERIES.

TABLE NO 1

DESIGN SPEED (Km/h)	SIGHT DISTANCE (L) (m)
50	150
60	180
70	210
80	240
90	270
100	300
110	330
120	360

SEE NOTE 3

VALID FOR FLAT GRADES ≤ 3%



DETAIL A
N.T.S.

NOTES:
1. GRADIENT ON BOTH ROADS SHOULD NOT BE MORE THAN 3%, ESPECIALLY ON THE JUNCTION ROAD.
2. FOR THE DESIGN OF SIGHT DISTANCES REFER TO PLAN No NWP 3/3.
3. THE DESIRABLE MINIMUM SIGHT DISTANCE IS 300m. ANY DEVIATION MUST BE SUBMITTED, WITH FULL SUPPORTING MOTIVATION, TO THE LIAISON ENGINEER FOR A DECISION.
4. THIS PLAN WILL SERVE AS A GUIDELINE ONLY, WELL MOTIVATED DIFFERENCES MAY BE CONSIDERED.
5. A PASSING LANE, 240m IN LENGTH (TAPERS INCLUDED) SHALL BE PROVIDED AS SHOWN ABOVE.
6. A SEPARATE LEFT-TURN LANE SHALL BE PROVIDED IF MORE THAN 250 V.P.H. ARE TURNING LEFT OUT OF THE MAIN ROAD, AS SHOWN ABOVE.
7. ALL RADII FOR KERBING IS MEASURED TO THE FACE OF THE KERB.
8. DEPENDANT ON THE ANGLE OF INTERSECTION THE RADIUS SHALL BE ADJUSTED TO ENSURE A MINIMUM ISLAND OF 7.5m².

SCALE ON REDUCED DRAWING

100mm ON ORIGINAL DRAWING

No.	DATE	AMENDMENTS	N.W.P.

NORTH WEST PROVINCE
DEPARTMENT OF PUBLIC WORKS AND ROADS

T-JUNCTION DETAIL ON SINGLE CARRIAGEWAY TARRED ROADS

APPROVED BY

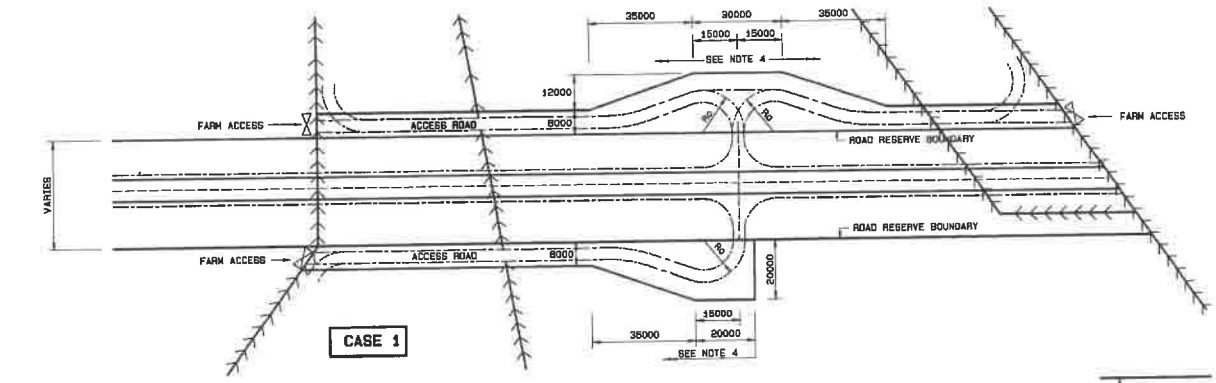
for HEAD OF DEPARTMENT

Date:

SCALE N T S

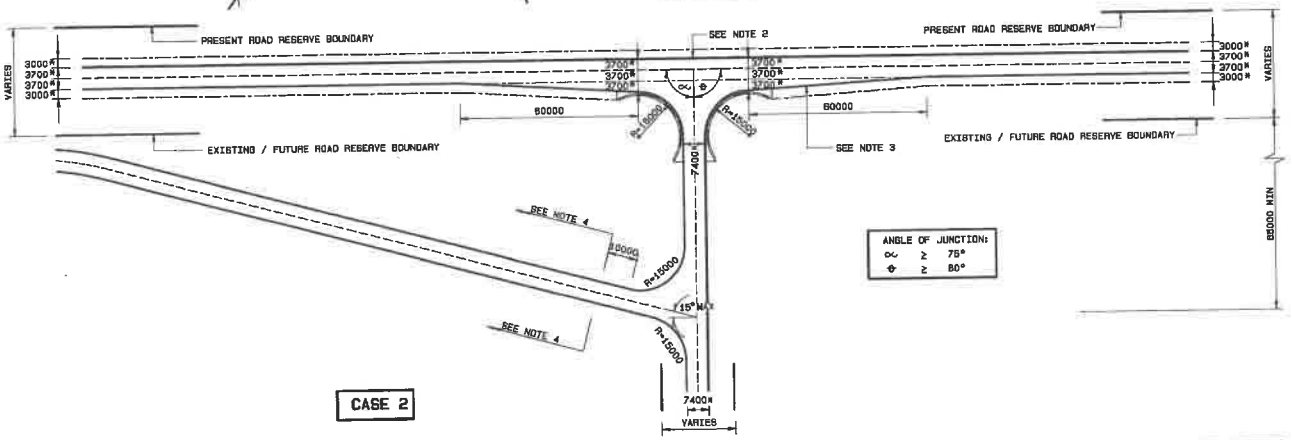
SHEET 1 OF 1 SHEET

PLAN No: NWP 3/4



APPLICATIONS:

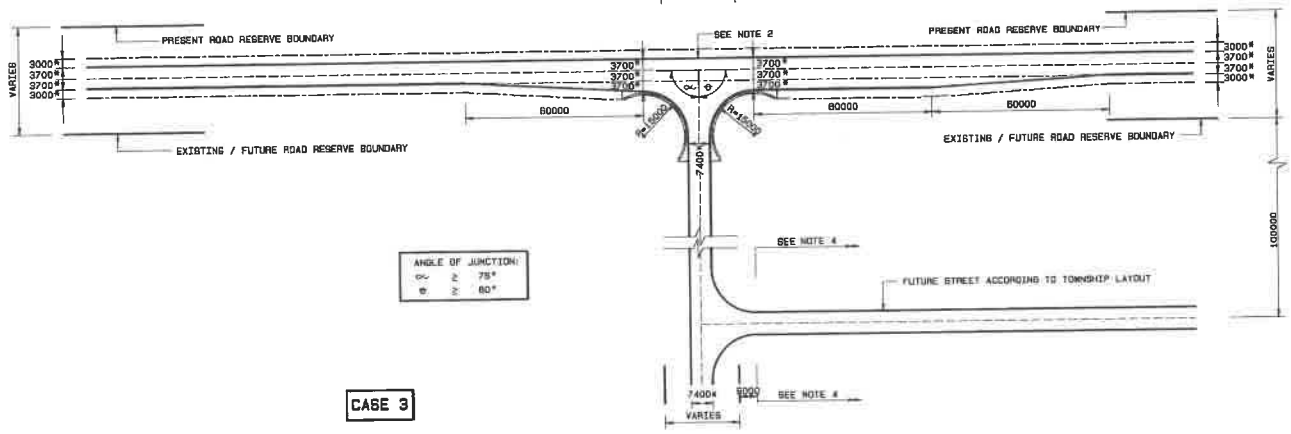
CASE 1 : ONLY FOR FARM / AGRICULTURAL HOLDING ACCESS ROADS WITH EVU'S < 25.
CASE 2 : ONLY FOR FARM / AGRICULTURAL HOLDING ACCESS ROADS WITH EVU'S ≥ 25.
CASE 3 : PREFERABLE LAYOUT. MINIMUM REQUIREMENTS FOR TOWNSHIP LAYOUT AND APPLICATIONS FOR CHANGE IN LAND USE.



NOTES:

1. Ro = TURNING RADIUS FOR WHEEL TRACK TAKEN AS 14,0m. THIS RADIUS IS EQUAL TO THE MINIMUM TURNING RADIUS OF A SINGLE UNIT PLUS TRAILER (SU+T) AT CRAWLING SPEED.
2. THE FEASIBILITY OF PROVIDING A PASSING LANE IN THE CASE OF SINGLE CARRIAGEWAY ROADS MUST BE EVALUATED.
3. THE FEASIBILITY OF PROVIDING A DECELERATION LANE MUST BE EVALUATED.
4. GATE TO BE PLACED ALONG ACCESS ROAD ACCORDING TO OWNER'S CHOICE. APPROVAL FROM LOCAL AUTHORITY MUST BE OBTAINED IN MUNICIPAL AREAS.

* WHERE APPLICABLE, CROSS SECTION DIMENSIONS ARE ADJUSTED ACCORDING TO THE APPROVED TYPICAL CROSS-SECTION BEING USED.



SCALE ON REDUCED DRAWING

100mm ON ORIGINAL DRAWING

No.	DATE	AMENDMENTS	N.W.P.

Department of Roads and Public Works
North West Province
Directorate: Roads

LAYOUT OF ACCESS ROAD INTERSECTIONS

APPROVED BY

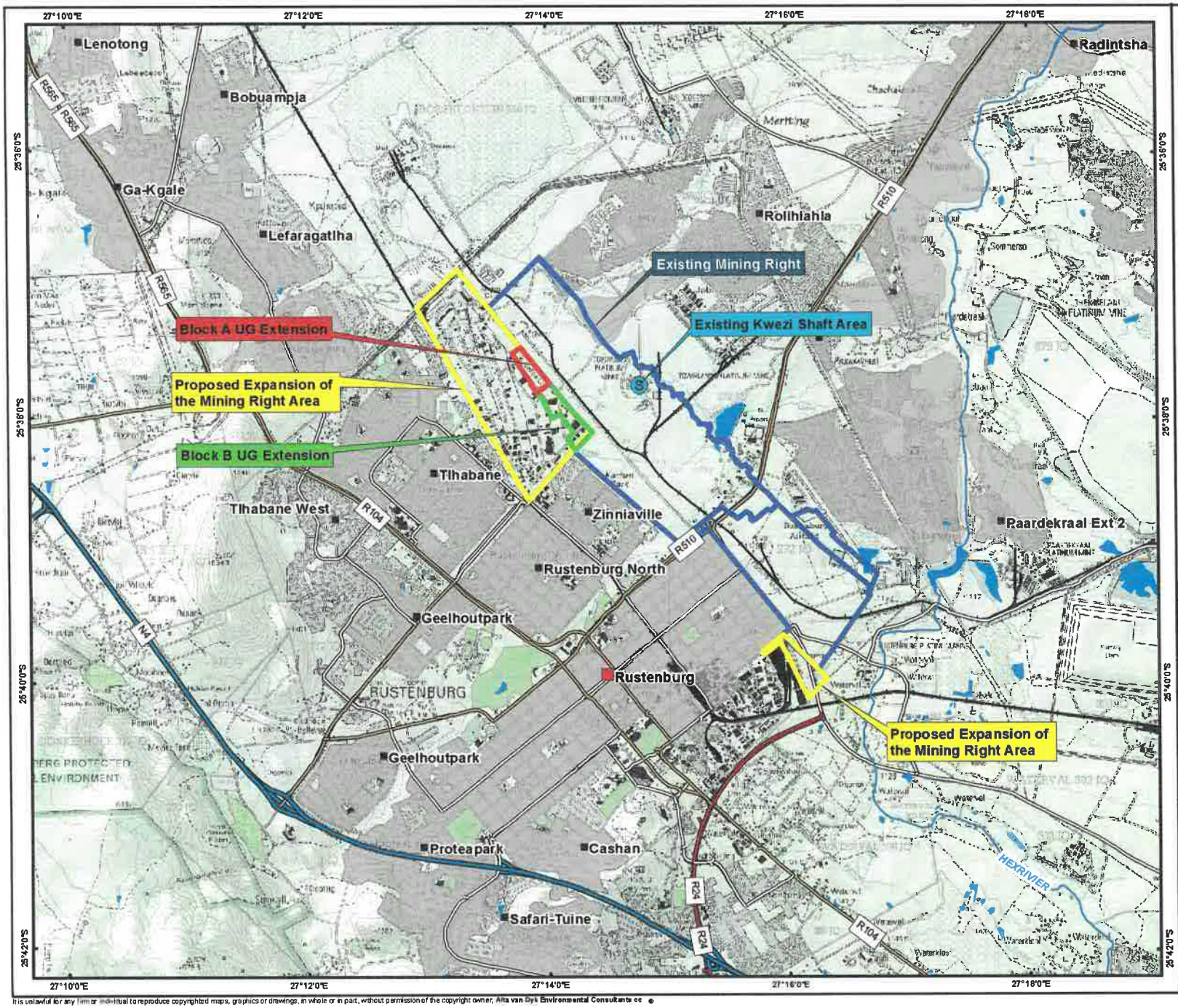
for HEAD OF DEPARTMENT

Date:

SCALE
N T S

SHEET 1 OF 1 SHEET

PLAN No: NWP 3/2



Legend

- Proposed Expansion of the Mining Right Area
- Block A UG Extension
- Block B UG Extension
- Existing Mining Right Area
- Existing Kwezi Shaft Area

- City
- Town
- Suburb

- Motorway
- Primary Road
- Secondary Road
- Tertiary Road
- Railway
- Perennial River

- Buidt Up Areas
- Open Areas
- Water Area



SCALE: 1: 70 000

0 1 2 3 Kilometers

N

TITLE

Locality Map
Figure 1

CLIENT:

Sibanye-Stillwater

DATE: Sept 2024	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVD
MAP: Kwezi_Locality_Map_Rev1	REV: 1

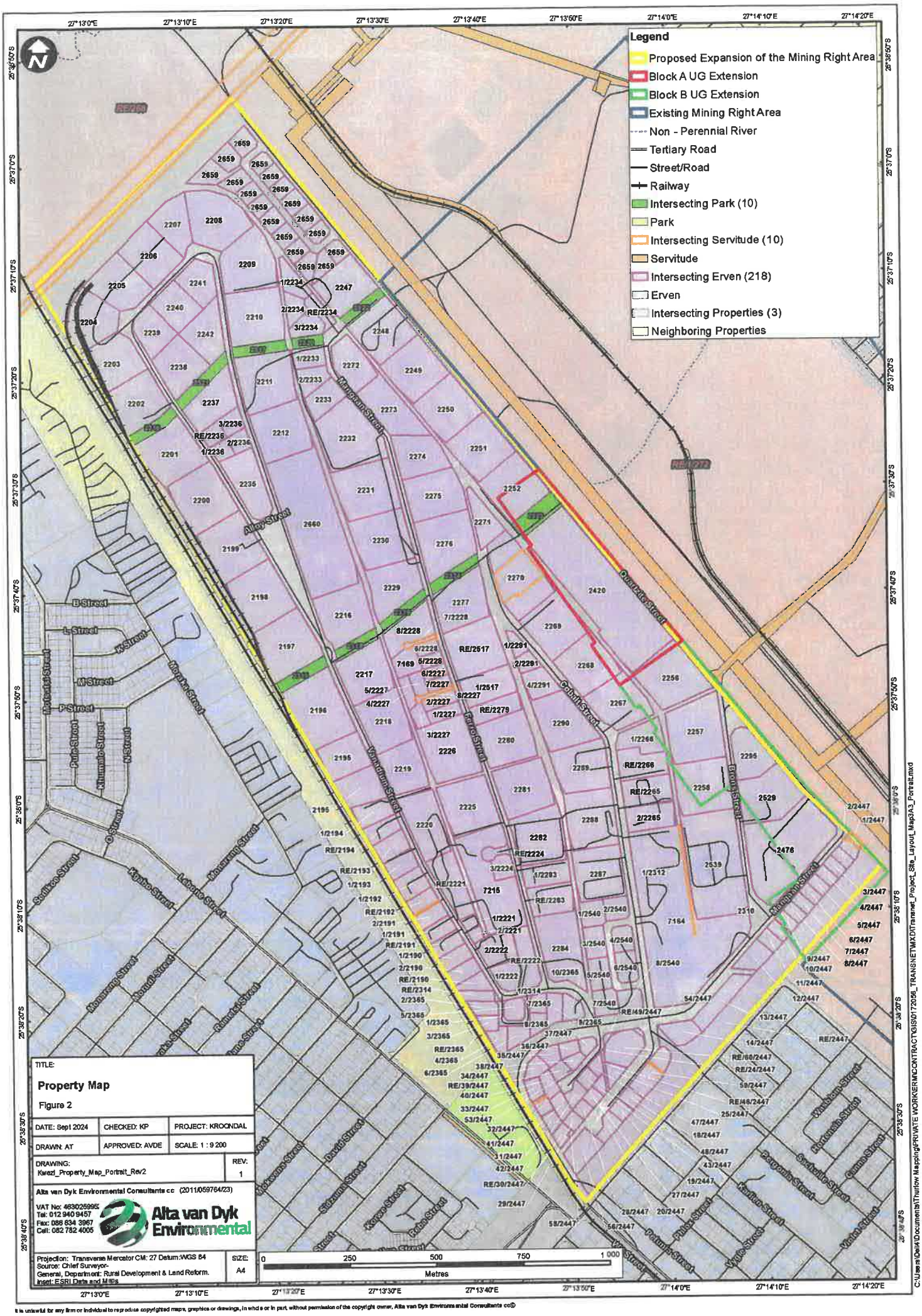
Alta van Dyk Environmental Consultants cc (2011/059764/23)
VAT No 4630259952
Tel: 012 940 9457
Fax: 086 634 3967
Cell: 082 782 4005

Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 DatumWGS 84
Source: Chief Surveyor-General, Department of Rural Development and Land Reform - 2527CB_2010_ED5_NM_GEO.tif
Inset: ESRI Data and Maps

SIZE: A4

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TITLE:

Property Map

Figure 2

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 9 200

DRAWING: Kwazi_Property_Map_Portrait_Rev2 | REV: 1

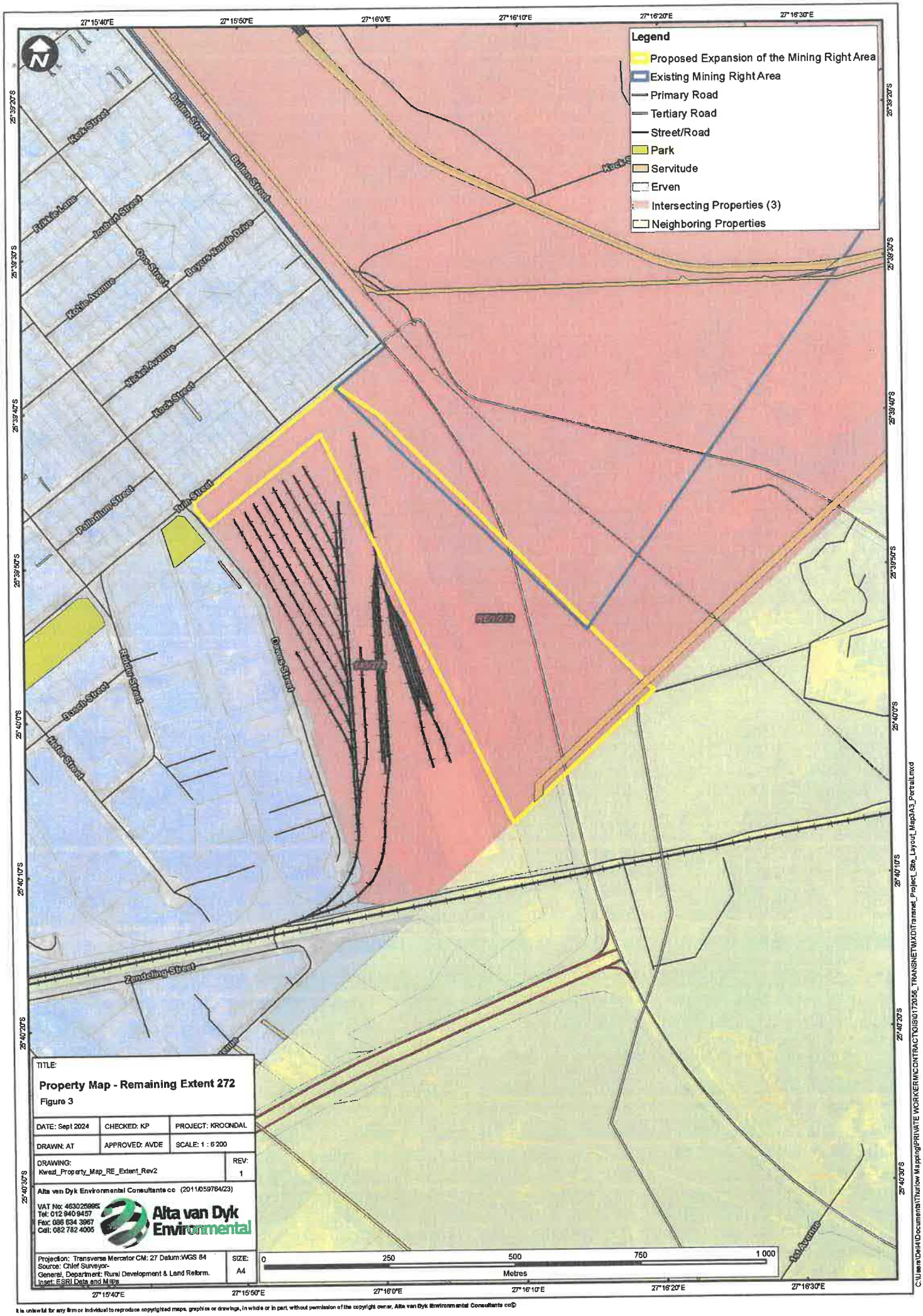
Alta van Dyk Environmental Consultants cc (2011/059764/23)
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Cell: 082 782 4005
Alta van Dyk Environmental

Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-General, Department: Rural Development & Land Reform.
Inset: ESRI Data and Misc.

SIZE: A4

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TITLE:

Property Map - Remaining Extent 272

Figure 3

DATE: Sept 2024	CHECKED: KP	PROJECT: KROONDAL
DRAWN: AT	APPROVED: AVDE	SCALE: 1 : 6 200

DRAWING: Kwezi_Property_Map_RE_Extent_Rev2 | REV: 1

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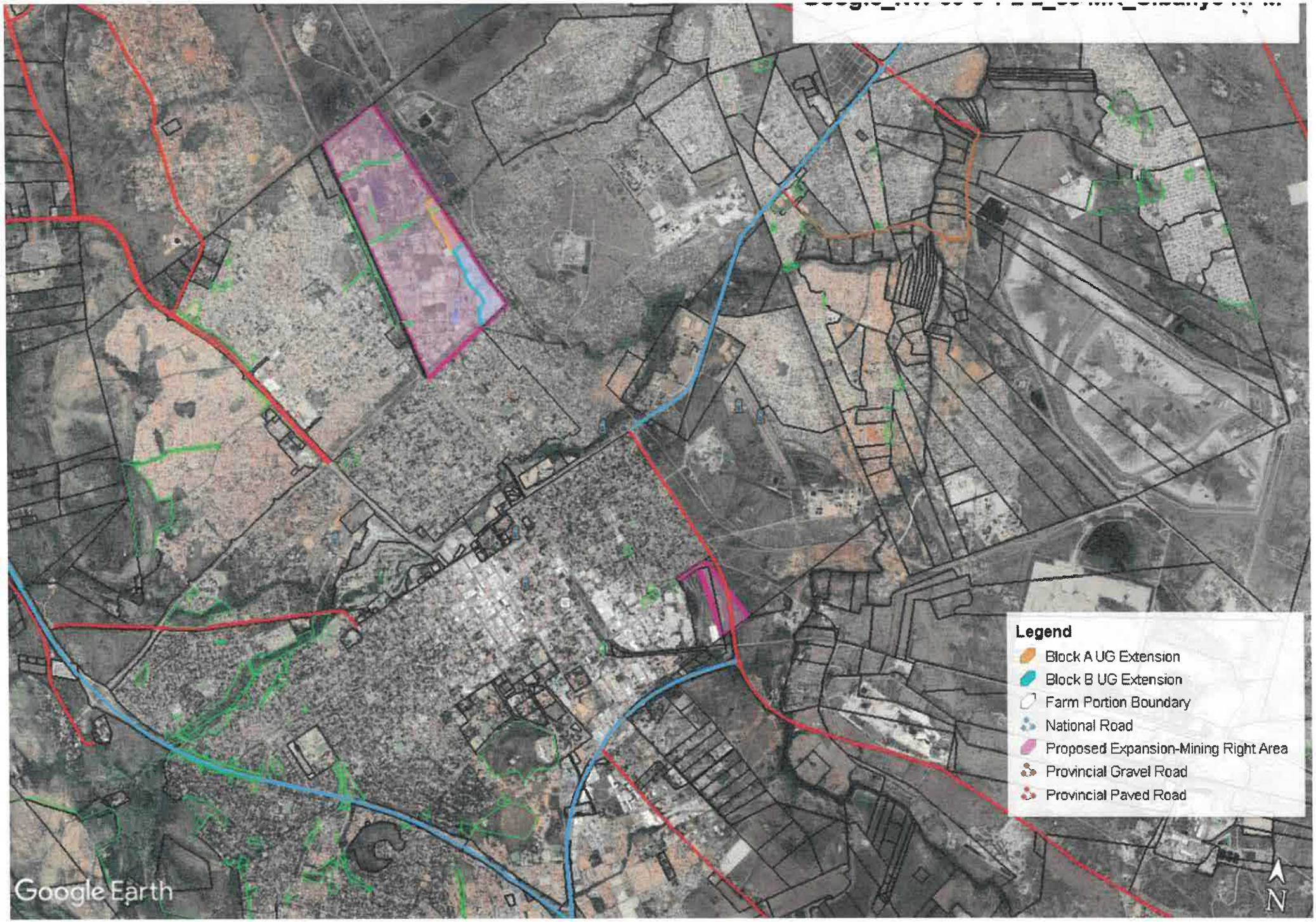
Alta van Dyk Environmental

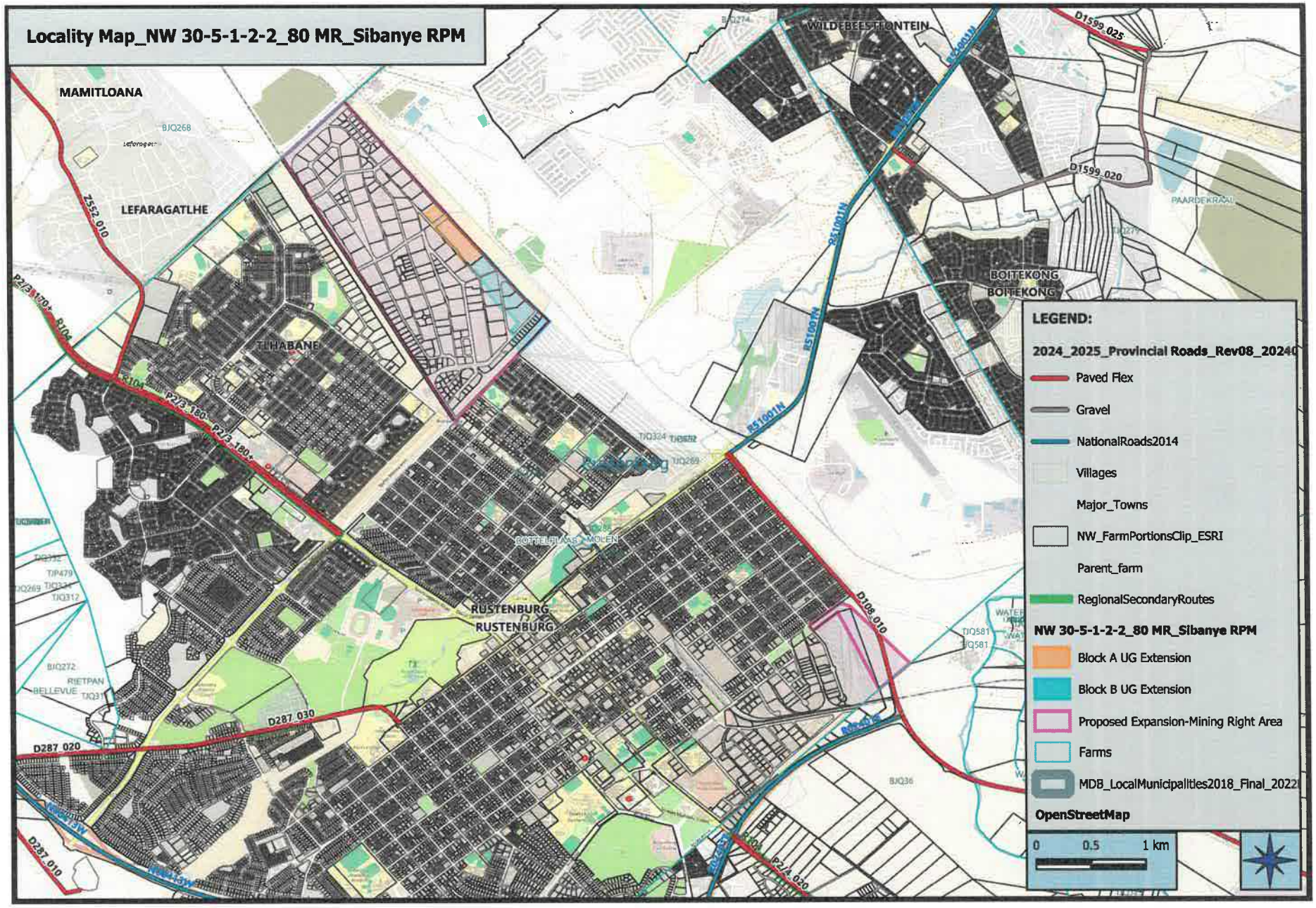
Projection: Transverse Mercator CM: 27 Datum:WGS 84
Source: Chief Surveyor-General, Department: Rural Development & Land Reform.
Inset: ESRI Data and Maps

SIZE: A4

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Legend
Block A UG Extension
Block B UG Extension
Farm Portion Boundary
National Road
Proposed Expansion-Mining Right Area
Provincial Gravel Road
Provincial Paved Road
Google Earth
N


Locality Map_NW 30-5-1-2-2_80 MR_Sibanye RPM
MAMITLOANA
LEFARAGATLHE
TLHABANE
RUSTENBURG
RUSTENBURG
WILDEBEESTFONTEIN
BOITEKONG
BOITEKONG
PAARDEKRAAL
BOTTELHLASS 2 MOLEN
RIETPAN
BELLEVUE
Z552_010
P273_120
R104
D1599_025
D1599_020
R510011N
D109_010
D287_030
D287_020
D287_010
P274_020
LEGEND:
2024_2025_Provincial Roads_Rev08_2024
Paved Flex
Gravel
NationalRoads2014
Villages
Major_Towns
NW_FarmPortionsClip_ESRI
Parent_farm
RegionalSecondaryRoutes
NW 30-5-1-2-2_80 MR_Sibanye RPM
Block A UG Extension
Block B UG Extension
Proposed Expansion-Mining Right Area
Farms
MDB_LocalMunicipalities2018_Final_2022
OpenStreetMap
0
0.5
1 km

RUSTENBURG
LOCAL MUNICIPALITY
OFFICE OF THE DIRECTOR
DIRECTORATE: COMMUNITY DEVELOPMENT
P O Box 16, Rustenburg, 0300, North West Province, South Africa
Tel: (014) 590 3104 Fax: (014) 590 3411 Email: dcdsecretary@rustenburg.gov.za

26 November 2024

Enq: Kelebogile Mekgoe

Attn: Kirthi Peramaul
Alta van Dyk Environmental (Pty) Ltd
Postnet Suite #745
Private Bag X1007
0140

DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED AMENDMENT OF MINING RIGHT AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A & B) NW30/5/1/2/2/80 MR.

The Directorate of Community Development within the Rustenburg Local Municipality (Unit: Integrated Environmental Management) acknowledges the receipt of the Basic Assessment for the proposed amendment of mining right and the expansion of the Kwezi Mining operations through the inclusion of the UG shallows blocks (A & B). The proposed project is for the expansion of the existing underground mining area at the Kwezi shaft.

Sibanye Rustenburg Platinum Mines (SRPM) intends to expand the Mining Right Area, through the incorporation of an area over a portion of remainder of Portion 1 and portion 127 (now known as Rustenburg Ext. 9) of the farm Rustenburg Town and Townlands 272 JQ. The proposed expansion area lies at the border of the SRPM mining right and can be mined from the Kwezi shaft.

The proposed Block A will cover an area of approximately 14 hectares and Block B comprise of approximately 22 hectares and the depth of the UG2 in both Blocks ranges between 40m and 80m. The proposed mining method that will be undertaken, is the room and pillar mining method through the use of mechanised mining.

The proposed expansion of the mining right area, with the mining of UG2 Blocks A and B, will be in order to increase the production and life of mine for the Kwezi Shaft. The Kwezi shaft is currently considered to be on their production decline phase with the expected life of mine to be until 2029.

The Kwezi Shaft is currently operational with the ore being hauled for processing to the Kroondal concentrators via an existing surface rail network.

No new infrastructure will be required as the existing surface infrastructure at Kwezi shaft will be utilised to access the Blocks (A & B).

The proposed development is listed in terms of the National Environmental Management Act, (NEMA, Act 107 of 1998), 07 April 2017, as amended. The development triggered Regulation GNR. 326, Listing Notice 1 (GN R 327) Activity 21D: *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, required for such amendment.*

Listing Notice 1, Activity 34: *The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution.*

During the site inspection undertaken by the Unit: Integrated Environmental Management, and the Environmental Assessment Practitioner (EAP) and Sibanye Stillwater Rustenburg Platinum Mine, the following were noted:

- The proposed site is highly developed with several warehouses and offices.
- There is Glencore Smelter within the study area.
- There is a man-made canal that runs through, one of the project site, and crosses the road, running into a wetland area.
- Other infrastructure includes electrical powerlines on site.

The Unit: IEM is satisfied with the aforementioned application, and wishes to submit the following recommendations:

- All mitigation measures and the recommendations contained in the Basic Assessment Report for the proposed activities must be implemented.
- The contents of the EMP must be made known to personnel, contractors and subcontractors associated with the project.
- Underground mining causes huge amounts of waste earth and rock to be brought to the surface- waste that often becomes toxic when it comes into contact with air and water.
- Underground mining might cause land subsidence as mines collapse and the land above it starts to sink, and this might cause serious damage to buildings.
- The water table might be low, that will lead to water resource destruction and also the contamination of drinking water.
- That the groundwater monitoring and management plan be put in place by SRPM.

The applicant must be responsible for compliance with the provisions for duty of care and remediation of environmental damage in accordance with Section 28 of National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.

This principle requires that the responsibility for cleaning up pollution lies with the polluter. The polluter is responsible of remedying or rehabilitating the resulting damage and bears the financial implications thereof. The responsibility of the polluter will not only be limited to the environment but may also include socio-cultural resources and harm to human health and well-being, Rustenburg Local Municipality Integrated Environmental Management Policy. (RLM IEM Policy 2023).

In light of the above and the information submitted, please note that the Unit: Integrated Environmental Management support the proposed expansion of the existing underground mining area at the Kwezi shaft.

Yours faithfully

.....

Ms. Lillian Sefike
Unit Manager: Integrated Environmental Management

26/11/2024

Date:

PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B

an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Boitshepo Motsodisa
Tel: 0123208490
Email: BMotsodisa@sahra.org.za
Case ID: 24044

Date: Tuesday, 3 December, 2024

Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)

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[webform_submission:user:field_organisation:0]
[webform_submission:user:field_address:0]

Alta Van Dyk Environmental Consultants (Pty) Ltd has been appointed by Sibanye Rustenburg Platinum Mines (Pty) Ltd to conduct an Environmental Authrorisation (EA) Application for the proposed amendment of mining rights and the expansion of the Kwezi Mining Operations over a portion of remainder of portion 1 and portion 127 (now known as Rustenburg Ext 9) of the farm Rustenburg Town and Townlands 272 JQ (various erven) within Rustenburg, in the North West Province

A Draft Basic Assessment Report (DBAR) has been submitted for Environmental Authorizations in terms of the National Environmental Management Act, 1998, and the National Environmental Management Waste Act, 2008 in respect of Listed Activities that have been Triggered by Applications in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (As Amended). The proposed development includes expanding underground mining activities at Kwezi Shaft, north of Rustenburg. Two blocks have been identified, named Block A and Block B.

Heritage Significance

J. A. van Schalkwyk was appointed to provide heritage specialist input into the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Van Schalkwyk, J. A. 2024. Heritage Complaince Statement for the Proposed Amenment of Mining Right 80MR for the expansion of the Kwezi Underground Mining Operations Rustenburg Local Municipality North West Province.

A letter of exemption has been submitted and reports as follows:

Based on the assessment, it became clear that the region has a low sensitivity for heritage sites and it is highly unlikely that any sites, features or objects of cultural significance would have existed within the boundaries of the Project Area.

PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B

an agency of the
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Case ID: 24044

Date: Tuesday, 3 December, 2024

The SAHRIS Palaeontological Sensitivity Map indicates that the Project Area has an insignificant to zero sensitivity. No further studies are required.

It is the opinion of the heritage consultant that there are no known sites, features or objects of cultural heritage significance that would be compromised in the event of any subsidence occurring as a result of the underground mining. From a heritage point of view the mining project should be allowed to proceed.

The SAHRA requests however, that a chance find procedure for archaeological resources be implemented for the project.

Final Comment

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- 38(4)b – The recommendations of the heritage specialists are supported and must be adhered to. In addition, a Chance Find Procedure should be implemented for the project.
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (bmotsodisa@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (bmotsodsa@sahra.org.za) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

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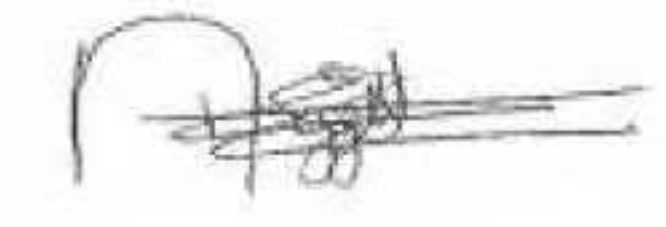
- The Final BAR and EMPr must be submitted to the SAHRIS application for record purposes;
- The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



Boitshepo Motsodisa
Heritage Officer: Development Applications Unit
South African Heritage Resources Agency



Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

Terms & Conditions:

PROPOSED AMENDMENT OF MINING RIGHT NW 80 MR AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B

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Case ID: 24044

Date: Tuesday, 3 December, 2024

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

ADMIN:
Direct URL to case: https://sahris.org.za/node/355017