

Appendix D11_CRR

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2nd PPP (22 July 2026- 26 August 2026)

Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
1.	18/08/2026 Email	Mark Dittke Specialist Environmental Health & Safety Attorney	Could you please urgently furnish copies of the following: 1) Current EMP (or is the 3 page document on your website the final and unabridged version?)	Please find herewith the BAR 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) “Project 1) The assumption has been made that the query relates to the EMP supporting the UG Shallows Block (A&B) Project. - The EMP supporting the UG Shallows Block (A&B) Project has been included within the BAR (as attached) as <u>Section 9</u>, and can be found on page “110 – 117” - Please take note that this application supports the expansion of the mining right area to include the mining of UG2 Blocks A and B, in order to increase the production and life of mine for the <u>existing</u> Kwezi Shaft. - The Kwezi Shaft was approved in the 2002 EMPr: Rustenburg UG2 Phase 2 Project — Boschfontein East EMPR Amendment/Addendum Reference: RDNW (KL) 6/2/2/195 (5) EM. - The UG Shallows Block (A&B) Project will be supported by the existing shaft area and will utilize the existing approved surface infrastructure. - The EMP supporting the UG Shallows Block (A&B) Project is therefore an addition to the approved 2002 EMPr: Rustenburg UG2 Phase 2 Project — Boschfontein East EMPR Amendment/Addendum Reference: RDNW (KL) 6/2/2/195 (5) EM.
2.			2) Is the report below (title page from the report downloaded from your website as “FBAR_Kwezi-Final”) the actual final BAR? It is noted that it is from January 2025, but yet a further notice for comments (attached) was published on 20 July 2026 with a deadline set for 21 August 2026.	2) That is correct. The Public Participation Process (PPP) supports an existing application that was lodged on 14 November 2024. At the request of the DMPR and in support of public engagement the Final Basic Assessment Report has been made available for further comment for a period of 30 Days. This is supported by the notification letter dated 20 July 2026.
3.			3) Further specialist studies, if performed, than those in the BAR.	3) The following specialist studies were included as Appendices to the BAR: - Appendix C1: Archaeological and cultural heritage impact assessment - Appendix C2: Freshwater Assessment - Appendix C3: Hydropedological Assessment - Appendix C4: Groundwater Impact Assessment - Appendix C5: Vibration, Blast and Stability Assessment These reports represent the specialist studies supporting the project. Please do let me know should you require a specific copy of the above-mentioned specialist reports. Please do not hesitate should there be any additional queries or clarifications required.
4.			4) Considering the imminent deadline your urgent reply would be appreciated.	Documentation as requested was submitted on 19/08/2026 via email to the I&AP
5.	18/08/2026 Email & Formal Letter	Gugu Manyathi Rainbow Chicken	1) We have received the application notification of Sibanye Rustenburg Platinum Mines (Pty) Ltd’s application to amend the environmental authorisation to expand the Kwezi Underground Mining Right by the inclusion of Shallow Block A and B.	This is accurately represented. The Public Participation Process (PPP) was extended to support the existing application that was lodged on 14 November 2024. At the request of the DMPR and in support of public engagement the Final Basic Assessment Report has been made available for further comment for a period of 30 Days. This is supported by the notification letter dated 20 July 2026 as referenced within this comment. The comment period has been extended from 22 July 2026 – 26 August 2026. This Final Basic Assessment Report supports the Memorandum of Agreement concluded between Rainbow Chicken and Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM).
6.			2) We note that this is the same application previously made and referenced in terms of the	



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			Memorandum of Agreement concluded between ourselves and Sibanye.	
7.			3) We enclose a copy of the signed Memorandum of Agreement.	We hereby formally acknowledge that the signed Memorandum of Agreement, dated 5 June 2026, has been shared with AvDE (Pty) Ltd.
8.			4) We have agreed to raise no further objection to Sibanye's application to amend the mining right, based on the provisions of the Agreement.	AvDE (Pty) Ltd and SRPM acknowledge Rainbow Chicken's agreement to raise no further objection to the application, subject to the full implementation and adherence to the provisions outlined in the Memorandum of Agreement dated 5 June 2026.
9.			5) Sibanye agreed to ensure that all documentation relating to the mining operations, including any new application, would be consistent with the provisions of the Agreement.	In accordance with the MOU, "Final BAR" means the Final Basic Assessment Report submitted by SRPM on or about January 2025 in support of the Section 102 Application. The Public Participation Process (PPP) was extended to support the existing application that was lodged on 14 November 2024. At the request of the DMPR and in support of public engagement the Final Basic Assessment Report has been made available for further comment for a period of 30 Days. It is hereby confirmed that this is still representative of the Final Basic Assessment Report submitted by SRPM on or about January 2025.
10.			6) We believe it is prudent to include the provisions of the Agreement, and particularly the obligations and risk allocation mechanisms agreed to by Sibanye in the application and request that the DMPR include these obligations and undertakings by Sibanye in their approval.	SRPM herewith confirms that the mitigation and monitoring measures contained in Clauses 5 to 9 of the MoA will be incorporated and implemented as part of the project commitments and reflected within the Comments and Response Register. As per the MOA (In summary): • Clause 5 (Buffer Zone): ○ No blasting activities will take place within the agreed 120 m blast-free buffer zone around Rainbow Chicken's infrastructure during the execution of the mining activities. ○ No future mining application for any new mining right or extension will be undertaken within the "Buffer Zone". • Clause 6 (Blasting and Prevention of Adverse Impacts): ○ Mining and blasting activities will be undertaken in accordance with recognised industry best practice and applicable regulatory requirements and shall adhere to the overriding principle. ○ All documents, records and reports relating to the SRPM mining operations will be made available to Rainbow ○ Appropriate controls, monitoring, and risk management measures will be implemented to ensure that blasting is conducted safely and that potential impacts on neighbouring infrastructure are avoided or minimised. Vibration monitoring and reporting will form part of the project's monitoring programme. • Clause 7 (Structural Damage & Remedial Action): ○ Suitably qualified independent structural engineer to conduct a baseline condition survey of relevant infrastructure. ○ If any damage is detected, a suitably qualified independent structural engineer to conduct an assessment. • Clause 8 (Water Supply): ○ Hydrocensus to be conducted ▪ The hydrocensus has been completed in advance of the proposed expansion works. Real-time groundwater monitoring systems will remain operational, and groundwater level and quality monitoring will continue as part of the environmental management programme. ○ In the event that the water level drops, SRPM to ensure an alternative supply (that meets the quality standards) ○ If contamination is detected, SRPM to implement a remedial plan. • Clause 9 (Monitoring and Independent Experts): ○ Real-time monitoring of vibration, groundwater, and other relevant environmental parameters will be undertaken by suitably qualified independent specialists to verify compliance and assess potential impacts.
11.			7) In particular, we would request that the undertakings by Sibanye referenced in clauses 5 to 9 and the provisions of clause 12 be specifically included by Sibanye in the application and comments and response report and that Sibanye request that those undertakings be recorded in the approval by DMPR.	



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				Parties shall convene a Monitoring Committee to review all monitoring data, assess risks, and raise any items requiring action
12.	17 August 2026 Email and Formal Letter	Waterflex (Pty) Ltd	Due to our comments about pollution and possible permanent damage to boreholes we need the guarantees for every borehole that in case Sibanye cannot replace such a borehole that: They will buy the property at market value plus additional cost to relocate	<u>Within the November 2025 Hydrogeological Impact Assessment</u> Specific Reverence is made to the following as concluded as part of the November 2025 Hydrogeological Impact Assessment: - The Waterflex and Flex Self Storage borehole 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. - 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 risk of the development of AMD (Acid Mine Drainage) conditions is negligible. - 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. - 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 - Based on the studies undertaken and the mitigation measures, it is unlikely that the water supply will be disrupted. <u>Within the January 2026 Updated Hydrogeological Impact Assessment</u> The Hydrogeological report was subsequently updated to further improve the confidence level: the updated study developed a new numerical groundwater model for the study area, with specific attention to the proposed mining extension. The newly acquired test pumping results and aquifer parameters were incorporated into the model.
13.			Or replace the property with a property similar with the approval of the owners. We will gladly accept such guarantees	

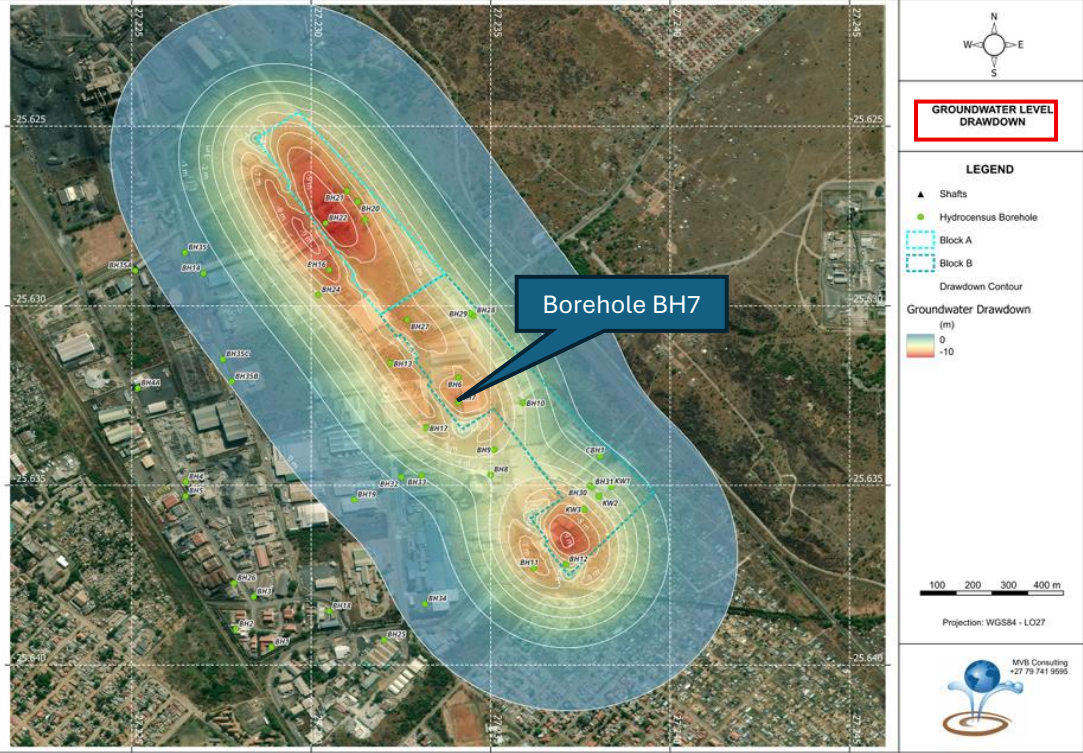


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Reports were made</td></tr></tbody></table> <table><thead><tr><th>Borehole</th><th>BH1</th><th>BH3</th><th>BH4</th><th>BH4A</th><th>BH5</th><th>BH6</th><th>BH7</th><th>BH11</th></tr><tr><th>Owner</th><th>Euro Steel</th><th>Mattress & Lounge Corporation</th><th>Chemblocks</th><th>Chemblocks (Gensec)</th><th>Allied Crane</th><th>Rustenburg Steel Construction</th><th>Flex Self Storage</th><th>Khumene Technologies</th></tr></thead><tbody><tr><td colspan="9">Borehole Information</td></tr><tr><td>Latitude</td><td>27.2289</td><td>27.2284</td><td>27.2265</td><td>27.22517</td><td>27.2265</td><td>27.234</td><td>27.2341</td><td>27.2362</td></tr><tr><td>Longitude</td><td>-25.6395</td><td>-25.6381</td><td>-25.6349</td><td>-25.6323</td><td>-25.6353</td><td>-25.632</td><td>-25.6327</td><td>-25.6373</td></tr><tr><td>Depth (m)</td><td>25</td><td>45</td><td>45</td><td>30</td><td>75</td><td>45</td><td>70</td><td>80</td></tr><tr><td>Water Level (m below surface)</td><td>4.15</td><td>5.22</td><td>8.10</td><td>13.44</td><td>7.89</td><td>8.80</td><td>8.00</td><td>7.07</td></tr><tr><td>Pump Depth (m below surface)</td><td>18</td><td>37</td><td>40</td><td>26</td><td>70</td><td>43</td><td>68</td><td>80</td></tr><tr><td>Available Drawdown (m)</td><td>13.85</td><td>31.78</td><td>31.90</td><td>12.56</td><td>62.11</td><td>34.20</td><td>60.00</td><td>72.93</td></tr><tr><td colspan="9">Pump Test Information</td></tr><tr><td colspan="9">Constant Rate Test</td></tr><tr><td>Abstraction Rate (lit/sec)</td><td>0.82</td><td>0.96</td><td>1.38</td><td>2.28</td><td>1.07</td><td>1.15</td><td>1.14</td><td>3.72</td></tr><tr><td>Test Duration (minutes)</td><td>720</td><td>720</td><td>720</td><td>380</td><td>720</td><td>720</td><td>720</td><td>720</td></tr><tr><td colspan="9">Recovery Test</td></tr><tr><td>Test Duration (minutes)</td><td>720</td><td>10</td><td>700</td><td>720</td><td>710</td><td>50</td><td>600</td><td>720</td></tr><tr><td>Percentage Recovery (%)</td><td>98</td><td>100</td><td>98</td><td>96</td><td>92</td><td>99</td><td>86</td><td>99</td></tr><tr><td colspan="9">Pump Test Results</td></tr><tr><td colspan="9">Transmissivity (m²/day)</td></tr><tr><td>Constant Rate Test</td><td>8.09 x 10¹</td><td>3.24 x 10¹</td><td>3.73 x 10⁰ 1.87 x 10¹</td><td>2.58 x 10¹ 3.51 x 10¹</td><td>8.84 x 10⁰</td><td>1.93 x 10⁰ 3.51 x 10⁻¹</td><td>8.54 x 10⁻¹ 1.08 x 10¹</td><td>1.92 x 10¹ 2.60 x 10¹</td></tr><tr><td>Recovery Test</td><td>5.95 x 10¹</td><td>3.01 x 10¹</td><td>1.52 x 10¹</td><td>2.03 x 10¹</td><td>4.70 x 10⁰</td><td>3.01 x 10⁻¹</td><td>8.55 x 10¹</td><td>1.30 x 10¹</td></tr><tr><td>Average</td><td>7.02 x 10¹</td><td>1.77 x 10¹</td><td>1.25 x 10¹</td><td>1.65 x 10¹</td><td>6.77 x 10⁰</td><td>2.24 x 10⁻¹</td><td>6.74 x 10¹</td><td>1.36 x 10¹</td></tr><tr><td colspan="9">Hydraulic Conductivity (m/day)</td></tr><tr><td>Constant Rate Test</td><td>6.08 x 10¹</td><td>1.02 x 10¹</td><td>1.17 x 10⁻¹ 5.86 x 10⁻¹</td><td>1.99 x 10¹ 2.70 x 10⁻¹</td><td>1.42 x 10⁻¹</td><td>5.65 x 10⁻² 1.03 x 10⁻¹</td><td>1.42 x 10⁻² 1.80 x 10⁻¹</td><td>2.64 x 10⁻² 3.57 x 10⁻¹</td></tr><tr><td>Recovery Test</td><td>4.48 x 10¹</td><td>9.46 x 10⁻²</td><td>4.74 x 10⁻¹</td><td>1.56 x 10¹</td><td>7.57 x 10⁻²</td><td>8.79 x 10⁻¹</td><td>1.42 x 10⁻¹</td><td>1.78 x 10⁻¹</td></tr><tr><td>Average</td><td>5.28 x 10¹</td><td>5.57 x 10⁻¹</td><td>3.92 x 10⁻¹</td><td>1.27 x 10¹</td><td>1.09 x 10⁻¹</td><td>6.55 x 10⁻¹</td><td>1.12 x 10⁻¹</td><td>1.87 x 10⁻¹</td></tr></tbody></table>	Borehole ID	Owner	Pump Tested	Borehole Sampled	Comment	BH1	Euro Steel	Yes	Yes	Tested	BH2	Twin Pack	No	No	Could not obtain permission to test	BH3	Mattress & Lounge Corporation	Yes	Yes	Tested	BH4	Chemblocks	Yes	Yes	Tested	BH4A	Chemblocks (Gensec)	Yes	Yes	Tested	BH5	Allied Crane	Yes	Yes	Tested	BH6	Rustenburg Steel Construction	Yes	Yes	Tested	BH7	Flex Self Storage	Yes	Yes	Tested	BH8	Fnnl	No	No	Boreholes were previously tested and sampled by private consultant. Reports were made	Borehole	BH1	BH3	BH4	BH4A	BH5	BH6	BH7	BH11	Owner	Euro Steel	Mattress & Lounge Corporation	Chemblocks	Chemblocks (Gensec)	Allied Crane	Rustenburg Steel Construction	Flex Self Storage	Khumene Technologies	Borehole Information									Latitude	27.2289	27.2284	27.2265	27.22517	27.2265	27.234	27.2341	27.2362	Longitude	-25.6395	-25.6381	-25.6349	-25.6323	-25.6353	-25.632	-25.6327	-25.6373	Depth (m)	25	45	45	30	75	45	70	80	Water Level (m below surface)	4.15	5.22	8.10	13.44	7.89	8.80	8.00	7.07	Pump Depth (m below surface)	18	37	40	26	70	43	68	80	Available Drawdown (m)	13.85	31.78	31.90	12.56	62.11	34.20	60.00	72.93	Pump Test Information									Constant Rate Test									Abstraction Rate (lit/sec)	0.82	0.96	1.38	2.28	1.07	1.15	1.14	3.72	Test Duration (minutes)	720	720	720	380	720	720	720	720	Recovery Test									Test Duration (minutes)	720	10	700	720	710	50	600	720	Percentage Recovery (%)	98	100	98	96	92	99	86	99	Pump Test Results									Transmissivity (m ² /day)									Constant Rate Test	8.09 x 10 ¹	3.24 x 10 ¹	3.73 x 10 ⁰ 1.87 x 10 ¹	2.58 x 10 ¹ 3.51 x 10 ¹	8.84 x 10 ⁰	1.93 x 10 ⁰ 3.51 x 10 ⁻¹	8.54 x 10 ⁻¹ 1.08 x 10 ¹	1.92 x 10 ¹ 2.60 x 10 ¹	Recovery Test	5.95 x 10 ¹	3.01 x 10 ¹	1.52 x 10 ¹	2.03 x 10 ¹	4.70 x 10 ⁰	3.01 x 10 ⁻¹	8.55 x 10 ¹	1.30 x 10 ¹	Average	7.02 x 10 ¹	1.77 x 10 ¹	1.25 x 10 ¹	1.65 x 10 ¹	6.77 x 10 ⁰	2.24 x 10 ⁻¹	6.74 x 10 ¹	1.36 x 10 ¹	Hydraulic Conductivity (m/day)									Constant Rate Test	6.08 x 10 ¹	1.02 x 10 ¹	1.17 x 10 ⁻¹ 5.86 x 10 ⁻¹	1.99 x 10 ¹ 2.70 x 10 ⁻¹	1.42 x 10 ⁻¹	5.65 x 10 ⁻² 1.03 x 10 ⁻¹	1.42 x 10 ⁻² 1.80 x 10 ⁻¹	2.64 x 10 ⁻² 3.57 x 10 ⁻¹	Recovery Test	4.48 x 10 ¹	9.46 x 10 ⁻²	4.74 x 10 ⁻¹	1.56 x 10 ¹	7.57 x 10 ⁻²	8.79 x 10 ⁻¹	1.42 x 10 ⁻¹	1.78 x 10 ⁻¹	Average	5.28 x 10 ¹	5.57 x 10 ⁻¹	3.92 x 10 ⁻¹	1.27 x 10 ¹	1.09 x 10 ⁻¹	6.55 x 10 ⁻¹	1.12 x 10 ⁻¹	1.87 x 10 ⁻¹
Borehole ID	Owner	Pump Tested	Borehole Sampled	Comment																																																																																																																																																																																																																																																																																			
BH1	Euro Steel	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH2	Twin Pack	No	No	Could not obtain permission to test																																																																																																																																																																																																																																																																																			
BH3	Mattress & Lounge Corporation	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH4	Chemblocks	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH4A	Chemblocks (Gensec)	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH5	Allied Crane	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH6	Rustenburg Steel Construction	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH7	Flex Self Storage	Yes	Yes	Tested																																																																																																																																																																																																																																																																																			
BH8	Fnnl	No	No	Boreholes were previously tested and sampled by private consultant. Reports were made																																																																																																																																																																																																																																																																																			
Borehole	BH1	BH3	BH4	BH4A	BH5	BH6	BH7	BH11																																																																																																																																																																																																																																																																															
Owner	Euro Steel	Mattress & Lounge Corporation	Chemblocks	Chemblocks (Gensec)	Allied Crane	Rustenburg Steel Construction	Flex Self Storage	Khumene Technologies																																																																																																																																																																																																																																																																															
Borehole Information																																																																																																																																																																																																																																																																																							
Latitude	27.2289	27.2284	27.2265	27.22517	27.2265	27.234	27.2341	27.2362																																																																																																																																																																																																																																																																															
Longitude	-25.6395	-25.6381	-25.6349	-25.6323	-25.6353	-25.632	-25.6327	-25.6373																																																																																																																																																																																																																																																																															
Depth (m)	25	45	45	30	75	45	70	80																																																																																																																																																																																																																																																																															
Water Level (m below surface)	4.15	5.22	8.10	13.44	7.89	8.80	8.00	7.07																																																																																																																																																																																																																																																																															
Pump Depth (m below surface)	18	37	40	26	70	43	68	80																																																																																																																																																																																																																																																																															
Available Drawdown (m)	13.85	31.78	31.90	12.56	62.11	34.20	60.00	72.93																																																																																																																																																																																																																																																																															
Pump Test Information																																																																																																																																																																																																																																																																																							
Constant Rate Test																																																																																																																																																																																																																																																																																							
Abstraction Rate (lit/sec)	0.82	0.96	1.38	2.28	1.07	1.15	1.14	3.72																																																																																																																																																																																																																																																																															
Test Duration (minutes)	720	720	720	380	720	720	720	720																																																																																																																																																																																																																																																																															
Recovery Test																																																																																																																																																																																																																																																																																							
Test Duration (minutes)	720	10	700	720	710	50	600	720																																																																																																																																																																																																																																																																															
Percentage Recovery (%)	98	100	98	96	92	99	86	99																																																																																																																																																																																																																																																																															
Pump Test Results																																																																																																																																																																																																																																																																																							
Transmissivity (m ² /day)																																																																																																																																																																																																																																																																																							
Constant Rate Test	8.09 x 10 ¹	3.24 x 10 ¹	3.73 x 10 ⁰ 1.87 x 10 ¹	2.58 x 10 ¹ 3.51 x 10 ¹	8.84 x 10 ⁰	1.93 x 10 ⁰ 3.51 x 10 ⁻¹	8.54 x 10 ⁻¹ 1.08 x 10 ¹	1.92 x 10 ¹ 2.60 x 10 ¹																																																																																																																																																																																																																																																																															
Recovery Test	5.95 x 10 ¹	3.01 x 10 ¹	1.52 x 10 ¹	2.03 x 10 ¹	4.70 x 10 ⁰	3.01 x 10 ⁻¹	8.55 x 10 ¹	1.30 x 10 ¹																																																																																																																																																																																																																																																																															
Average	7.02 x 10 ¹	1.77 x 10 ¹	1.25 x 10 ¹	1.65 x 10 ¹	6.77 x 10 ⁰	2.24 x 10 ⁻¹	6.74 x 10 ¹	1.36 x 10 ¹																																																																																																																																																																																																																																																																															
Hydraulic Conductivity (m/day)																																																																																																																																																																																																																																																																																							
Constant Rate Test	6.08 x 10 ¹	1.02 x 10 ¹	1.17 x 10 ⁻¹ 5.86 x 10 ⁻¹	1.99 x 10 ¹ 2.70 x 10 ⁻¹	1.42 x 10 ⁻¹	5.65 x 10 ⁻² 1.03 x 10 ⁻¹	1.42 x 10 ⁻² 1.80 x 10 ⁻¹	2.64 x 10 ⁻² 3.57 x 10 ⁻¹																																																																																																																																																																																																																																																																															
Recovery Test	4.48 x 10 ¹	9.46 x 10 ⁻²	4.74 x 10 ⁻¹	1.56 x 10 ¹	7.57 x 10 ⁻²	8.79 x 10 ⁻¹	1.42 x 10 ⁻¹	1.78 x 10 ⁻¹																																																																																																																																																																																																																																																																															
Average	5.28 x 10 ¹	5.57 x 10 ⁻¹	3.92 x 10 ⁻¹	1.27 x 10 ¹	1.09 x 10 ⁻¹	6.55 x 10 ⁻¹	1.12 x 10 ⁻¹	1.87 x 10 ⁻¹																																																																																																																																																																																																																																																																															



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				 The map displays an aerial view of a mining area with overlaid groundwater drawdown contours. The contours are color-coded from blue (0m) to red (10m). Mining blocks A and B are outlined in green. Numerous hydrocensus boreholes are marked with green dots and labeled (e.g., BH1, BH2, BH3, BH4, BH5, BH6, BH7, BH8, BH9, BH10, BH11, BH12, BH13, BH14, BH15, BH16, BH17, BH18, BH19, BH20, BH21, BH22, BH23, BH24, BH25, BH26, BH27, BH28, BH29, BH30, BH31, BH32, BH33, BH34, BH35, BH36, BH37, BH38, BH39, BH40, BH41, BH42, BH43, BH44, BH45, BH46, BH47, BH48, BH49, BH50, BH51, BH52, BH53, BH54, BH55, BH56, BH57, BH58, BH59, BH60, BH61, BH62, BH63, BH64, BH65, BH66, BH67, BH68, BH69, BH70, BH71, BH72, BH73, BH74, BH75, BH76, BH77, BH78, BH79, BH80, BH81, BH82, BH83, BH84, BH85, BH86, BH87, BH88, BH89, BH90, BH91, BH92, BH93, BH94, BH95, BH96, BH97, BH98, BH99, BH100). A blue callout box points to Borehole BH7. The map includes a north arrow, a scale bar (0 to 400m), and a legend. The legend defines symbols for Shafts, Hydrocensus Borehole, Block A, Block B, Drawdown Contour, and Groundwater Drawdown (m) with a color scale from 0 to 10. The map is projected using WGS84 - LO27. The AvD GLOBAL logo is visible in the background. • The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 10 m. The extent of the impact is within a radius of approximately 450m 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. None of the boreholes are expected to be significantly affected and none of the boreholes will dry-up.



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				A concern was raised by the landowners on the possibility of groundwater contamination from the mining activities. The only mining related contaminant source that can potentially impact on the groundwater is after mine closure when the mine fills with water. The geochemical assessment, however, indicated that there are no chemicals of concern expected in the flooded mine workings. The potential impact from the mine, should any unexpected contamination occur, was therefore modelled as a percentage of the source concentration, rather than a specific contaminant parameter. This way the impacts can be related to a wide range of parameters by using the percentage of the source parameter concentration. <u>It is evident that in the unlikely event of contamination occurring, the plume migration will be in a north-easterly direction, away from the industrial area. There are no other groundwater users within the expected contaminant migration path. The proposed mining extension is not expected to impact on the groundwater quality in the private boreholes within the industrial area.</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 and management of the groundwater aspects. AvDE (Pty) Ltd, would like to highlight that a comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. <u>Groundwater monitoring will be conducted during the operational and closure phases of the project. Samples will be analyzed by an independent, SANAS-accredited laboratory.</u> The EMPr has the following extensive mitigation measures as it relates to Groundwater Management during all phases of the project: Operational Phase:



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress. - 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. 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. 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. 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. - 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. - The Numerical Flow and Contaminant Transport Model (groundwater model) must be updated every two years (in terms of the Life of Mine) with the most recent data and the results thereof shared with the affected users. - The dewatering pipeline and pumping system must be installed with a flow water at strategic places to accurately determine the amount of groundwater inflow into the underground mine workings. - The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the groundwater monitoring (quality and quantity) results are presented and discussed. - Quarterly monitoring of drilled boreholes for groundwater quality aspects will be undertaken. • Dewatering qualities must be measured at the transfer and pollution control dams. - The results of the water quality monitoring will be used to verify the rate of movement of the groundwater pollution plume. - Machinery should be well maintained and properly operated. - Spills should be cleaned up immediately, and the relevant authorities notified in the event of a significant spill. - Contaminated material must either be stored on-site in an approved waste disposal area or removed by credible contractors. - The applicant must be responsible for compliance with the provisions for duly of care and remediation of environmental damage in accordance with Section 28 of the 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 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 IEM Policy 2023). Decommissioning & Closure Phase: - Post closure water quality impacts must be confirmed through the development of a 3-dimensional flood model to increase the confidence levels of the following: - Based on the updated geological information gathered during mining update the groundwater inflow mechanisms and inflow rates - Through predictive modelling predict the time it will take for the groundwater to rebound a flood / fill the void. - Through predictive modelling simulate the expected mine water quality over the long term post flooding. - Confirm the potential for long term decant post closure as well as the predicted location of the decant points/zone. - Confirmation of the expected decant quality and volumes. Predictive modelling should allow for different closure or partial closure scenarios. All Phases:



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- The site to implement a water management hierarchy of avoid, reuse, recycle as far as practically possible. The development (if not in place), update (if in place) and implementation of awareness & training on this subject matter, EMP objectives and commitments to all permanent employees, contractors and visitors (where deemed necessary). Under the National Water Act (Act 36 of 1998), with specific reference to the approved WUL Reference: 06/A22H/CGI/16533 - Exemption from GN704 Regulation 4(a) gives recognition to the fact that activities are located locate within within a horizontal distance of 100 metres from any watercourse or estuary, borehole. - The Approved WUL has included the following binding conditions: - Required: Monitoring of drilled boreholes for groundwater level and quality - Required: Monitoring result submission to the Regulatory Authority - Required: Internal and External Auditing also to be submitted to the Regulatory Authority Required: In the event surrounding groundwater affected by the authorized water use activities. in terms of groundwater quantity and quality. due to depletion or contamination of groundwater resources, the groundwater users must be compensated with potable water. Specific Reverence is made to the following as concluded as part of the Vibration 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. - 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. The hydrogeological assessments and Vibration and Stability Assessment confirms that the risk of groundwater contamination or permanent damage to existing boreholes is low. Borehole BH7 will not be undermined, and geochemical testing indicates a negligible risk of Acid Mine Drainage or pollutant leaching exceeding drinking water standards. Furthermore, groundwater flow in the area moves away from the borehole toward the mining area. To safeguard water users, the site's Environmental Management Programme (EMPr) includes legally binding mitigation measures. Should operational activities impact any existing user's groundwater supply, SRPM is obligated to replace the water source by drilling a new or deeper borehole or providing an alternative source. Water quality and levels will be continuously tracked through a comprehensive monitoring plan and shared with landowners via quarterly Environmental Monitoring Committee meetings. Regarding property acquisition, please be advised that property buyouts, property replacements, and relocation guarantees fall outside the scope of this project and are not currently being considered.
14.	05 August 2026 Email and Formal Letter	Nosisi du Toit	Dear Madam/Sir, Thank you for providing Interested and Affected Parties with the opportunity to comment on the Final Basic Assessment Report (BAR) for the proposed amendment of Mining Right NW 80 MR and the expansion of the Kwezi Mining Operations. I appreciate the opportunity to participate in the environmental authorisation process. Having reviewed the Final BAR, I acknowledge that the proposed expansion seeks to extend underground mining operations by incorporating UG Shallows Blocks A and B into the existing mining right, with access through the existing	This is noted and is accurately represented. The application supports the expansion of the mining right area to include the mining of UG2 Blocks A and B, in order to increase the production and life of mine for the existing Kwezi Shaft. - The Kwezi Shaft was approved in the 2002 EMPr: Rustenburg UG2 Phase 2 Project — Boschfontein East EMPr Amendment/Addendum Reference: RDNW (KL) 6/2/2/195 (5) EM. - UG Shallows Block (A&B) Project will be supported by the existing shaft area and will utilize the existing approved surface infrastructure. The EMP supporting the UG Shallows Block (A&B) Project has been included within the BAR (as attached) as Section 9, and can be found on page "110 – 117". The EMP supporting the UG Shallows Block (A&B) Project is therefore an addition to the approved 2002 EMPr: Rustenburg UG2 Phase 2 Project — Boschfontein East EMPr Amendment/Addendum Reference: RDNW (KL) 6/2/2/195 (5) EM. - AvDE (Pty) Ltd and Sibanye Rustenburg Platinum Mine (SRPM) recognise the importance of mining to the economy of the North West Province. However, also recognises it is equally important that mining development proceeds in a manner that protects environmental resources, respects surrounding communities and complies fully with the principles of sustainable development contained in the National Environmental Management Act, 1998.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			Kwezi Shaft and without constructing new surface infrastructure. I recognise the importance of mining to the economy of the North West Province. However, it is equally important that mining development proceeds in a manner that protects environmental resources, respects surrounding communities and complies fully with the principles of sustainable development contained in the National Environmental Management Act, 1998.	It is critical to note that incorporating UG Shallows Blocks A and B extends the Life of Mine for the Kwezi Shaft, directly securing existing employment and preventing premature job losses and operational downscaling.
15.	05 August 2026 Email and Formal Letter	Nosisi du Toit	1) Groundwater Protection The Executive Summary identifies groundwater as one of the significant environmental risks associated with the proposed project. I recommend that the Environmental Authorisation include the following conditions: - Independent groundwater quality and groundwater level monitoring throughout the operational life of the project. - Continued groundwater monitoring after mine closure until groundwater conditions have stabilised.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. AvDE (Pty) Ltd, would like to highlight that a comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. Groundwater monitoring will be conducted during the operational and closure phases of the project. Samples will be analyzed by an independent, SANAS-accredited laboratory. The EMPr has the following extensive mitigation measures as it relates to Groundwater Management during all phases of the project: Planning Phase: - SRPM to compile a Monitoring and Management Plan which shall be discussed with the potentially affected landowner owners prior to the undertaking of mining activities Operational Phase: - Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress. - 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. - 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 needs to form the baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement. - 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. - 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. - 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. - The Numerical Flow and Contaminant Transport Model (groundwater model) must be updated every two years (in terms of the Life of Mine) with the most recent data and the results thereof shared with the affected users. - The dewatering pipeline and pumping system must be installed with a flow water at strategic places to accurately determine the amount of groundwater inflow into the underground mine workings. - The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the groundwater monitoring (quality and quantity) results are presented and discussed.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- Quarterly monitoring of drilled boreholes for groundwater quality aspects will be undertaken. • Dewatering qualities must be measured at the transfer and pollution control dams. - The results of the water quality monitoring will be used to verify the rate of movement of the groundwater pollution plume. - Machinery should be well maintained and properly operated. - Spills should be cleaned up immediately, and the relevant authorities notified in the event of a significant spill. - Contaminated material must either be stored on-site in an approved waste disposal area or removed by credible contractors. - 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 the 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 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 IEM Policy 2023). Decommissioning & Closure Phase: - Post closure water quality impacts must be confirmed through the development of a 3-dimensional flood model to increase the confidence levels of the following: - Based on the updated geological information gathered during mining update the groundwater inflow mechanisms and inflow rates - Through predictive modelling predict the time it will take for the groundwater to rebound a flood / fill the void. - Through predictive modelling simulate the expected mine water quality over the long term post flooding. - Confirm the potential for long term decant post closure as well as the predicted location of the decant points/zone. - Confirmation of the expected decant quality and volumes. Predictive modelling should allow for different closure or partial closure scenarios. All Phases: - The site to implement a water management hierarchy of avoid, reuse, recycle as far as practically possible. The development (if not in place), update (if in place) and implementation of awareness & training on this subject matter, EMP objectives and commitments to all permanent employees, contractors and visitors (where deemed necessary).
16.	05 August 2026 Email and Formal Letter	Nosisi du Toit	Public availability of groundwater monitoring results at least twice per year.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. As part of the EMPr, SRPM has committed to the establishment of an Environmental Monitoring Committee with the potentially affected landowners, whereby monitoring results is presented on a quarterly basis. The EMPr which becomes a legally binding documentation against which site compliance is tracked.
17.	05 August 2026 Email and Formal Letter	Nosisi du Toit	Immediate investigation and corrective action should contamination or unacceptable groundwater drawdown be detected.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. AvDE (Pty) Ltd, would like to highlight that a comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. The EMPr has the following extensive mitigation measures as it relates to Groundwater Management (Water Quantity) during all phases of the project: - 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. - 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. - 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.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
18.	05 August 2026 Email and Formal Letter	Nosisi du Toit	2) Blasting, Subsidence and Public Safety The report also identifies blasting and ground vibration as significant impacts requiring mitigation. To safeguard neighbouring properties and infrastructure, I recommend that: Independent structural condition surveys be undertaken before mining commences in areas potentially affected by vibration.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. Attention is firstly brought to the outcome of the Vibration and Stability Assessment: - South African guidelines set a ground vibration limit of 6 mm per second to protect rural structures, such as mud houses, from damage. - The calculations show the planned blasting will only cause ground vibrations of about 2 mm per second—well below the maximum safe limit. - To keep vibrations low, the mine will only blast short sections at a time (up to 2 meters per blast) and will use weaker, low-density explosives. - The mine will continuously measure and track ground vibrations during blasting to ensure they stay within required safety limits. The impact from blasting and vibration is therefore not seen as a significant residual impact. The following mitigation measures have been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked: - Monitoring and Management Plan which shall be discussed with the potentially affected landowner owners prior to the undertaking of mining activities - The proposed mine geometry is fit for purpose, with the following adjustments required: - Update the mine plan to exclude any mining < 35.0mbs as a minimum - Limit advance per blast to 3.0m up to a minimum depth below surface of 50.0m (considering a factor of safety of around 1.4) - Limit advance per blast to a maximum of 2.0m between 35.0mbs and 50.0ms. - Ensure that primary support caters for a fall-out thickness equal to the distance up to the triplets (established to be 2.0m in the area of interest) plus an additional length to cater for adequate anchorage into the solid rock. - Ensure that a monitoring and instrumentation program is developed that is specific to the shallow mining area that considers at least: - The condition of the hanging wall parallel contacts. - Increase or decrease of water flow/presence. - Rock mass conditions, and suitability of support to cater for conditions. - Ground vibration (including frequencies) and air-blast. - High resolution monitoring of surface deformation for comparison to expected vertical displacement. - Third party consultation and monitoring should be considered for all ground vibration and air blast monitoring work. - Development (if not already in place), update (if in place) and implementation of a Blast Management Plan. - Placement of vibration monitoring equipment within the study area - Continuous vibration and surface subsidence monitoring - Follow recommended pillar geometry and mining span guidelines - Follow recommended support guidelines SRPM has identified specific areas where a qualified structural engineer will conduct baseline condition surveys on infrastructure, prior to starting mining operations. SRPM will coordinate these surveys individually with affected landowners.
19.	05 August 2026 Email and Formal Letter	Nosisi du Toit	- A transparent procedure be established for investigating and resolving complaints relating to blasting impacts - Blast monitoring information be made available to affected communities on request. - The mine maintain an accessible mechanism for reporting blasting-related concerns.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. AvDE (Pty) Ltd, would like to highlight the following management measure which has been included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the monitoring results are presented and discussed. In addition to this, SRPM has a grievance procedure in place whereby the I&APs are able to raise concerns and complaints for close out.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
20.	05 August 2026 Email and Formal Letter	Nosisi du Toit	3) Environmental Monitoring and Transparency The BAR contains environmental monitoring commitments, including groundwater monitoring. To strengthen accountability, I recommend that Sibanye Stillwater publish annual environmental performance reports covering: • Groundwater quality. • Groundwater levels. • Dust monitoring. • Noise monitoring. • Blasting monitoring. • Compliance with the Environmental Management Programme (EMPr). • Environmental incidents and corrective actions implemented. Making this information publicly available would improve transparency and public confidence.	In accordance with the NEMA Environmental Impact Assessment Regulations, 2014 Published under GN R982 in GG 38282 of 4 December 2014 as amended, Section 26(h) there is: <i>"A requirement that the environmental authorisation, approved EMPr and closure plan in the case of a closure activity, audit reports including the environmental audit report contemplated by regulation 34, and all compliance monitoring reports be made available for inspection and copying-</i> <i>(i) at the site of the authorised activity;</i> <i>(ii) to anyone on request; and</i> <i>(iii) where the holder of the environmental authorisation has a website, on such publicly accessible website; and</i> <i>(i) any relevant conditions which the competent authority deems appropriate."</i>
21.	05 August 2026 Email and Formal Letter	Nosisi du Toit	4) Community Engagement Although the report outlines the public participation process undertaken during the Basic Assessment, meaningful engagement should continue throughout the implementation of the project. I therefore recommend that Sibanye Stillwater establish a Community Environmental Monitoring Forum comprising representatives of affected communities and relevant stakeholders. The forum should meet regularly to discuss: • Environmental monitoring results. • Community complaints and responses. • Progress with mitigation measures. Compliance with Environmental Authorisation conditions.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. AvDE (Pty) Ltd, would like to highlight the following management measure which has been included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the monitoring results are presented and discussed.
22.	05 August 2026 Email and Formal Letter	Nosisi du Toit	5) Local Economic Development Mining should contribute meaningfully to local socio-economic development. I recommend that Sibanye Stillwater continue to strengthen: • Employment opportunities for local residents. • Procurement from local small, medium and micro enterprises.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. AvDE (Pty) Ltd, would like to highlight the following management measure which has been included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. • Before the commencement of the expansion activities, Mine management should establish links with the Local community to share information and ideas about the proposed expansion. • Develop a clear and concise employment policy prioritizing local employment and communicate this through established communication protocols. • Where reasonable and practical the Kwezi Operations should appoint local contractors



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			- Enterprise and supplier development initiatives. - Skills development and apprenticeship programmes for youth. - Opportunities for women-owned businesses to participate in the mine's supply chain. Annual reporting on these initiatives would improve accountability and demonstrate the project's contribution to inclusive economic development.	- Where feasible, efforts should be made to employ local contactors that are compliant with Broad Based Black Economic Empowerment (BBBEE) criteria. - Before the construction phase commences, the proponent should meet with representatives from the local Traditional Councils (TAs) to discuss and identify measures to enhance opportunities for local employment. This should include setting targets for local employment, specifically for low and semi-skilled work categories. - Where feasible training and skills development programmes for local workers should be initiated prior to the initiation of the construction phase. - The recruitment selection process should seek to promote gender equality and the employment of women wherever possible. - Implement management and enhancement measures as per the SLP - Implement the Social and Labour Plan Commitments with regards to decommissioning and closure. - The Final Rehabilitation and Closure Plan to take into consideration the needs of the community as it relates to the end land use. In addition to the conditions as included within the EMP, attention is brought to the mine's Social and Labour Plan (SLP), which operationalizes socio-economic recommendations into legally binding commitments under the Mineral and Petroleum Resources Development Act (MPRDA, Act 28 of 2002). A SLP is a mandatory statutory requirement under the MPRDA. It must be submitted to and formally approved by the Department of Mineral Resources and Energy (DMRE) before a mining right is granted and is a dynamic document that is formally revised, consulted on with stakeholders, and resubmitted every five years throughout the operational life of the mining right. The Core Objectives of the SLP are: Economic Development aimed at promoting sustained economic growth and mineral resource development. Social Transformation aimed at advancing the social and economic welfare of all South Africans while driving the transformation of the mining industry. Host Community Benefits aimed at guaranteeing tangible, lasting socio-economic benefits for both host communities and labor-sending areas The Key Requirements and Focus Areas are: - Human Resource Development (HRD) - Employment Equity - Local Economic Development (LED) - Procurement & Enterprise Development; and - Housing & Living Conditions
23.	05 August 2026 Email and Formal Letter	Nosisi du Toit	6) Rehabilitation and Closure The BAR includes closure objectives and financial provision for rehabilitation. I recommend that: - Progressive rehabilitation be undertaken wherever practicable during operations. - Financial provision for rehabilitation be reviewed regularly to ensure adequacy. - Environmental monitoring continue after closure until environmental objectives have been achieved.	This comment has been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. Rehabilitation: SRPM has an existing Final Rehabilitation, Decommissioning and Mine Closure Plan for its Mining Operations (inclusive of Kwezi Shaft). The following key closure objectives have been formulated to guide the closure measures to be implemented on site towards achieving the above closure vision: - Creating a safe, physically stable rehabilitated landscape that limits long-term erosion potential and environmental degradation - Sustaining long term catchment yield and water quality - Focus on establishing a functional post-mining landscape that supports the surrounding land uses and is aligned with regional planning - Interconnecting rehabilitated landscapes with surrounding regionally biologically diverse areas - Encouraging, where appropriate, the re-instatement of terrestrial and aquatic wetland biodiversity over time - Creating opportunities for alternative post-mining livelihoods by aligning to regional planning With specific reference to the Mining Blocks A & B: - The mined-out areas will be backfilled with oversize waste rock during the proposed mining of the UG2 Shallow mineral deposit.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- No waste rock will be brought to the surface for placement on the existing Waste Rock Dumps. - This allows for: - Reducing the ground level footprint and height of the existing surface Waste Rock Dumps - Promotes stability in the mined out underground areas; and - Sustainable return of the rock to its origin Financial Provision: Attention is brought to the fact that the application is for the inclusion of Mining Blocks A & B in the SRPM Mining Right Area for the purposes of the continuation of the Kwezi underground mining area. This will capitalise on the existing infrastructure already established at Kwezi Shaft, and no additional surface infrastructure is required in support of this expansion initiative. The existing Kwezi Shaft is supported by a Financial Provision that is updated and submitted to the DMPR for consideration on an annual basis. This Financial Provision is supportive and sufficient for the Kwezi Mining Blocks A & B. Environmental Monitoring (Post Closure): Attention is brought to the Environmental Management Programme (EMPr) included within the Basic Assessment Report (BAR), which details extensive mitigation measures across all project phases (including the decommissioning, closure, and post-closure phases). These measures ensure that continuous environmental monitoring and mitigation are implemented to achieve the overarching environmental management objectives for each specific environmental aspect. Under South African environmental and mining regulations (NEMA, NEM:WA, NWA and the MPRDA), the closure and post-closure provisions in an EMPr require the holder to continue environmental monitoring until: - All defined closure and environmental management objectives have been met. - The site reaches a stable, self-sustaining condition; and - The competent authority formally issues a Closure Certificate releasing the mine from further liability.
24.	05 August 2026 Email and Formal Letter	Nosisi du Toit	7) Conclusion I support responsible mining that contributes to economic development while protecting environmental resources and neighbouring communities. Should the competent authority decide to approve this application, I respectfully request that the Environmental Authorisation incorporate strengthened conditions relating to: - Independent groundwater monitoring. - Blasting and vibration management. - Public reporting of environmental performance. - Continued community engagement. - Progressive rehabilitation. - Ongoing environmental compliance monitoring. I further request that these comments be included in the official Comments and Response Report and be taken into consideration by the	It is herewith formally recorded and confirmed that all comments have been included within the Comment and Response Register for submission to the Competent Authority for final review and consideration. This submission will occur alongside the submission of the Final Basic Assessment Report.

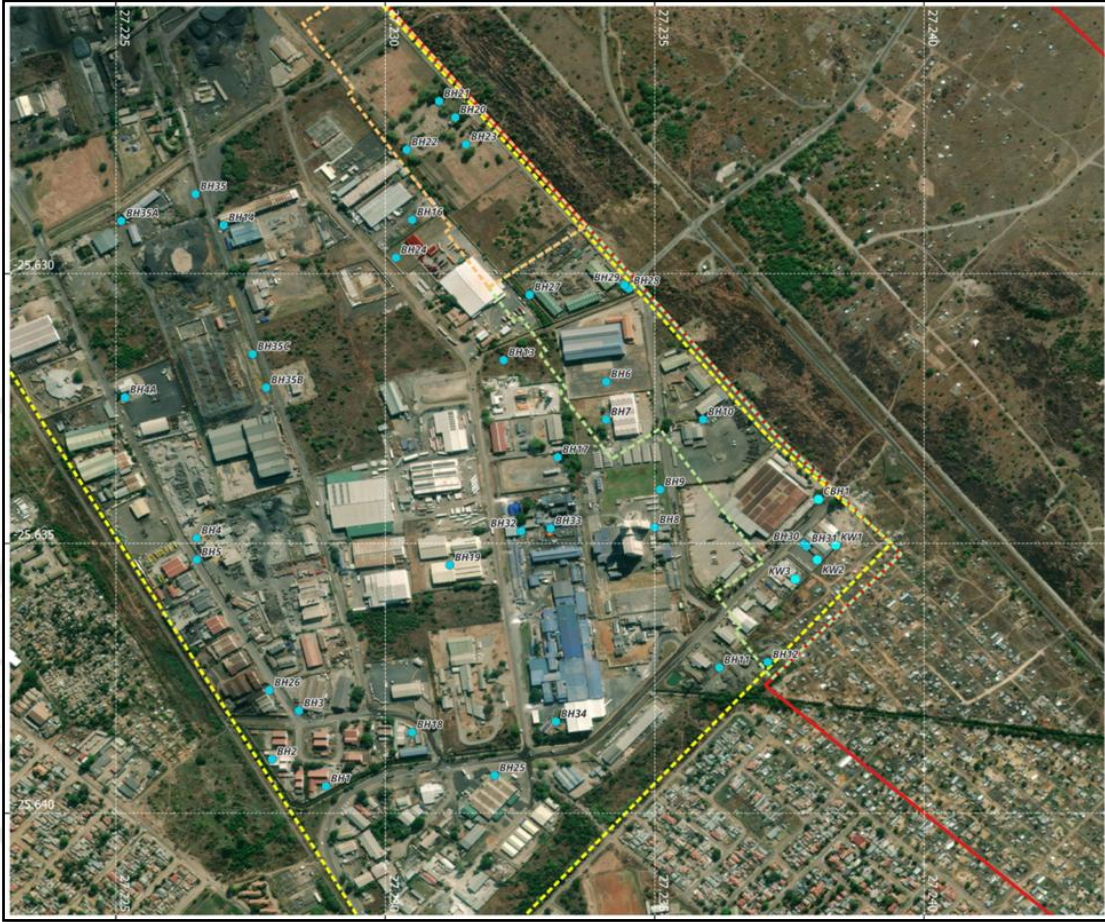


Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			Department of Mineral and Petroleum Resources during its decision-making process. The BAR states that all comments received during the public participation process will form part of the decision-making record.	
25.	28/07/2026 Email	Gizelle Adams Impala Platinum Holdings Limited	May you kindly assist with a copy of the Final Basic Assessment Report (FBAR).	A copy of the Final Basic Assessment Report (FBAR) was provided via email on 31 July 2026.
26.	22/07/2026	Mr. Mduduzi Mabuza General Manager MABUTANA LOGISTICS AND CARRIERS	This serves as an enquiry, with regard to the corporate social investment plan and SMME opportunities in the extension for (NW 30/5/1/2/2/80 MR), the enquiry is what are the opportunities that are currently available and will the extension provide us with that opportunity, lastly how do we participate, especially on the core opportunities and or core supporting opportunities?	Sibanye-Stillwater is committed to supporting local economic development through its procurement, enterprise and supplier development, and community investment initiatives. While the current mining right extension application (NW 30/5/1/2/2/80 MR) does not in itself create immediate business opportunities, approval of the extension will support the continuation of mining activities and may sustain or create future opportunities for local SMMEs and service providers. Opportunities are generally advertised through the Company's procurement and supplier registration processes, with preference given to compliant and capable local businesses where applicable. Community members and SMMEs are encouraged to register on the Company's supplier database and participate in stakeholder engagement platforms where information on upcoming opportunities and development programmes is communicated. Any opportunities arising from the project will be managed in accordance with applicable procurement policies, operational requirements, and regulatory commitments.
27.	16 July 2026 Email	Vuyisile Kona	1) I received the hydrology report for the Sibanye Kwezi shallow mining project in Rustenburg. However, I noticed that my boreholes, which were tested by your team, are not reflected in the final report. 2) Could you please assist me with this as soon as possible? 3) Name of the company: 4) VK Chrome Boreholes tested: 2 5) Ironveld Boreholes tested 2	The arial imagery below provides context of the property in question with regards to its locality from the Mining Block A&B

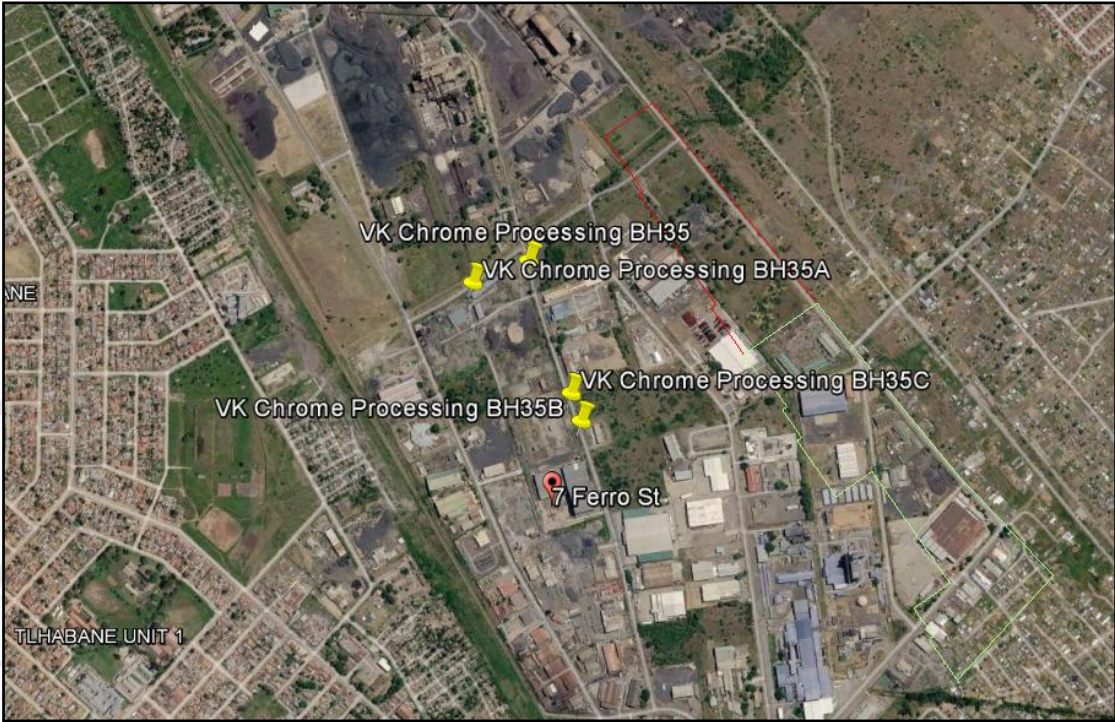


Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				 <u>To provide context:</u> An initial hydrocensus was undertaken in support of the project on the 3rd of October 2024 during which twenty-eight (28) properties were visited. Twenty-five (25) boreholes were identified during this census. During the initial public participation process several landowners indicated that their boreholes were not shown on the list. Many of the properties had been sub-divided and more than one borehole has been drilled by the business owners. A follow-up hydrocensus was therefore undertaken in December 2024 and January 2025. A further thirteen (13) boreholes were located. The figure below provides for the Hydrocensus Boreholes Summary:



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses																																																												
				 In terms of the equery as raised above, AvDG (Pty) Ltd and Sibanye Rustenburg Platinum Mines Limited (SRPM) has noted that 4 boreholes are being enquired about. For “VK Chrome Processing” the following boreholes formed part of the Hydrocensus: <table><tr><th rowspan="3">Borehole ID</th><th colspan="3">Coordinates</th><th rowspan="3">Owner</th><th rowspan="3">Borehole Depth [m]</th><th colspan="2">Borehole Use and Abstraction</th><th colspan="2">Hydrogeological information</th></tr><tr><th rowspan="2">Latitude</th><th rowspan="2">Longitude</th><th>Elevation</th><th rowspan="2">Primary Use [-]</th><th rowspan="2">Abstraction Rate [L/s]</th><th colspan="2">Static Water Level</th></tr><tr><th>[mams!]</th><th>[mbgl]</th><th>[mams!]</th></tr><tr><td>BH35</td><td>-25.62852</td><td>27.22648</td><td>1140.96</td><td>VK Chrome Processing</td><td>40</td><td>Commercial</td><td>1.38</td><td>23.12</td><td>1117.84</td></tr><tr><td>BH35A</td><td>-25.62902</td><td>27.22510</td><td>1145.37</td><td>VK Chrome Processing</td><td>75</td><td>Commercial</td><td>1.66</td><td>10.23</td><td>1135.14</td></tr><tr><td>BH35B</td><td>-25.63211</td><td>27.22779</td><td>1143.55</td><td>VK Chrome Processing</td><td>50</td><td>Commercial</td><td>Unknown</td><td>7.30</td><td>1136.25</td></tr><tr><td>BH35C</td><td>-25.63149</td><td>27.22754</td><td>1142.92</td><td>VK Chrome Processing</td><td>45</td><td>Commercial</td><td>Unknown</td><td>7.54</td><td>1135.38</td></tr></table>	Borehole ID	Coordinates			Owner	Borehole Depth [m]	Borehole Use and Abstraction		Hydrogeological information		Latitude	Longitude	Elevation	Primary Use [-]	Abstraction Rate [L/s]	Static Water Level		[mams!]	[mbgl]	[mams!]	BH35	-25.62852	27.22648	1140.96	VK Chrome Processing	40	Commercial	1.38	23.12	1117.84	BH35A	-25.62902	27.22510	1145.37	VK Chrome Processing	75	Commercial	1.66	10.23	1135.14	BH35B	-25.63211	27.22779	1143.55	VK Chrome Processing	50	Commercial	Unknown	7.30	1136.25	BH35C	-25.63149	27.22754	1142.92	VK Chrome Processing	45	Commercial	Unknown	7.54	1135.38
Borehole ID	Coordinates			Owner		Borehole Depth [m]	Borehole Use and Abstraction				Hydrogeological information																																																					
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				 Four (4) boreholes linked to the I&AP were therefore identified and evaluated as part of the hydrocensus. AvDE (Pty) Ltd, would like to highlight that a comprehensive groundwater monitoring system will be implemented for the Project as to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. The EMPr has included extensive mitigation measures as it relates to Groundwater Management during all phases of the project, Specific attention is brought to the following: Operational Phase: - 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. - 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. - 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. - The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the groundwater monitoring (quality and quantity) results are presented and discussed.
28	20 August 2026	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	We represent our client, CCBSA regarding the EIA process currently being undertaken for the proposed expansion of the mining rights of Kwezi Mining Operations through the inclusion of the	AvDE (Pty) Ltd acknowledge receipt of the formal letter and confirm that Coca-Cola Beverages South Africa (Pty) Ltd, has been registered as an Interested and Affected Party (I&AP) for the Project.



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	Email/ Formal Letter		UG Shallows Blocks (A & B). CCBSA premises are located at Cnr Mangaan & Quartzite Steets, Industrial Area, Rustenburg. Erf 2476 Rustenburg Extension 9, North-West and is used for warehousing and offices.	It was requested that Mills & Otten (Pty) Ltd confirm whether Coca-Cola Beverages South Africa (Pty) Ltd is being represented by an additional consulting firm as a formal notification has already been received on 19 August 2026 by a different firm representing Coca-Cola Beverages South Africa (Pty) Ltd. On 20 August 2026, Mills & Otten (Pty) Ltd formally confirmed that they are the only company appointed to represent Coca-Cola Beverages South Africa (Pty) Ltd.
29	20 August 2026 Email/ Formal Letter	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Status of Appeal It is understood that RCL submitted an appeal against the decision granting the approval of the amendment of the mining rights. The appeal was submitted to the Department of Forestry, Fisheries and Environment (the appeal authority). Please can you provide an update on the status of this appeal.	It is herewith confirmed that an Appeal was lodged by RCL Foods Consumer (Pty) Ltd. A decision was made by the Department of Forestry, Fisheries and the Environment (DFFE) to uphold the appeal (DFFE Reference: LSA263431) lodged by RCL Foods Consumer (Pty) Ltd against Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for the proposed amendment of Mining Right NW80 and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A&B). AvDE (Pty) Ltd would like to bring attention to the fact that a Memorandum of Agreement (MOA), with the Appellant (RCL Foods Consumer (Pty) Ltd) commenced shortly after the appeal was lodged (on 28 August 2025) and has since then been successfully agreed and formally signed by both parties. Post this, RCL Foods Consumer (Pty) Ltd formally issued a response stating that they, as the only Appellants, no longer hold an objection with regards to the “proposed amendment of Mining Right NW80 and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A&B)” Project.
30	20 August 2026 Email/ Formal Letter	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Additional Extended Public Participation Process An email regarding an extended public participation process for commenting on the final BAR was sent out on 21 July 2026. Under what circumstances or approval is the report circulated for comment when the decision is subject to an appeal? Please could the process that is being followed be explained. The timing of the application process in terms of the NEMA EIA regulations must also be please be explained.	The status of the appeal process has been concluded above. The below represents additional clarification and context with regard to the current process being undertaken: The Public Participation Process (PPP) supports the existing application that was lodged on 14 November 2024. At the request of the DMPR and in support of public engagement the Final Basic Assessment Report has been made available for further comment for a period of 30 Days. Due to the lapsing of statutory timeframes on the initial submission of the Final Basic Assessment Report (FBAR) and the conclusion of the Appeal Process, a new Application for Environmental Authorisation has been lodged with the Department of Mineral and Petroleum Resources (DMPR). While this is administratively a new application it pertains to the exact same mining footprint project scope, spatial footprint, and technical baseline and outcomes previously evaluated since 14 November 2025. In the 14 November 2024 application, the total area of expansion was 325.45ha, with mining operations focused on the Underground Shallows Blocks (A&B) measuring 33.91ha. This additional public participation process is only over 33.91ha of Blocks A&B as the rest of the area will no longer be included into the mining right of NW 80 MR for the Kwezi Mining Operations project. The S102 Application has been approved for the Underground Shallows Block (A&B). In accordance with the projected project timelines as discussed and agreed with the Regulatory Authority, the statutory cutoff date for the submission of the final report and the accompanying Comments and Responses Report (CRR) is 02 September 2026. Please take note that consulting on the Final Basic Assessment Report (FBAR) ensures full transparency. This does not take away from any I&APs right to comment and possibly alter the report currently within the public domain, not does it take away from the required 107 Day Regulatory Authority Review Period. This enables informed, meaningful input prior to submission to the DMPR.
31	20 August 2026 Email/ Formal Letter	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Confusion on dates for commenting “The email letter that informs I&APs of the extended public participation period states the following: “The Final Basic Assessment Report will be available for public comment for a period of 30 calendar days, from 22 July to 21 August 2026,” However the Final BAR states the following: “This Final Basic Assessment Report was	It is herewith confirmed that the 30-day review and comment period officially closes on 26 August 2026. We confirm that Mills & Otten (Pty) Ltd has up until 26 August 2026 to submit their written comments and inputs on behalf of Coca-Cola Beverages South Africa (Pty) Ltd. This was also formally communicated via email to Mills & Otten (Pty) Ltd on 20 August 2026



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			available for public comments for a period of 30 days from the 27 July 2026 to 26 August 2026.” And the following bold statement in the report is also referenced: “DUE DATE FOR COMMENT ON FINAL BAR IS 26 August 2026” These dates between the email and the report are contradictory. Confirmation of the date for submission of comments is requested. Please note that cognisance of Regulation 3 (1) and (5) of the EIA regulations must be given when calculating the dates for commenting. Given the first date for commenting is tomorrow, 21 August 2026, an urgent response to this correspondence is requested.	
32	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	“As per our correspondence dated 20 August 2026 in which we confirmed that we represent CCBSA Rustenburg, we hereby submit further comment on the Final Basic Assessment Report circulated for additional public participation until 26 August 2026. It is understood that the extension of the Kwezi mining operation requires an amendment of the mining license (reference number NW30/5/1/1/2/80 MR) which must undergo an Environmental Impact Assessment application before the license can be amended. The expansion of Kwezi Mining Operations is through the inclusion of the UG Shallows Blocks (A & B), of which Block B underlies the CCBSA premises located at Cnr Mangaan & Quartzite Steets, Industrial Area, Rustenburg.”	It is herewith confirmed that Coca-Cola Beverages South Africa (Pty) Ltd, is a registered Interested and Affected Party (I&AP) and that it has been formally recorded that Coca-Cola Beverages South Africa (Pty) Ltd (CCBSA) is being represented by Mills & Otten (Pty) Ltd. It is herewith confirmed that the Kwezi Operation (UG Shallows Blocks (A&B) required an amendment of the mining license (reference number NW30/5/1/1/2/80 MR). A S102 Application was submitted and subsequently approved. The project is also supported by an Environmental Authorization Application Process, this is being undertaken as a Basic Assessment Process as stated in Chapter 4 Part 2 of the Environmental Impact Assessment Regulations, 2014 Published under GN R982 in GG 38282 of 4 December 2014 as amended. AvDE (Pty) Ltd and Sibanye Rustenburg Platinum Mines (SRPM) confirm that Block B underlies the Coca-Cola Beverages South Africa (Pty) Ltd premises located at the corner of Mangaan and Quartzite Streets, Industrial Area, Rustenburg.
33	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	“The following points were raised in the initial comments submitted on 20 August 2026 and a response was received on 25 August 2026. 1. Status of Appeal It is understood that RCL submitted an appeal against the decision granting the approval of the amendment of the mining rights. The appeal was submitted to the Department of Forestry, Fisheries and Environment (the appeal	It is herewith confirmed that an Appeal was lodged by RCL Foods Consumer (Pty) Ltd. A decision was made by the Department of Forestry, Fisheries and the Environment (DFFE) to uphold the appeal (DFFE Reference: LSA263431) lodged by RCL Foods Consumer (Pty) Ltd against Sibanye Rustenburg Platinum Mines (Pty) Ltd (SRPM) for the proposed amendment of Mining Right NW80 and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A&B). AvDE (Pty) Ltd would like to bring attention to the fact that a Memorandum of Agreement (MOA), with the Appellant (RCL Foods Consumer (Pty) Ltd) commenced shortly after the appeal was lodged (on 28 August 2025) and has since then been successfully agreed and formally signed by both parties. Post this, RCL Foods Consumer (Pty) Ltd formally issued a response stating that they, as the only Appellants, no longer hold an objection with regards to the “proposed amendment of Mining Right NW80 and the expansion of the Kwezi Mining Operations through the inclusion of the UG Shallows Blocks (A&B)” Project.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			authority). Please can you provide an update on the status of this appeal. It is understood that the appeal was upheld, making the EA null and void. 2. Additional Extended Public Participation Process: An email regarding an extended public participation process for commenting on the final BAR was sent out on 21 July 2026. Under what circumstances or approval is the report circulated for comment when the decision is subject to an appeal? Please could the process that is being followed be explained. The timing of the application process in terms of the NEMA EIA regulations must also please be explained. From the response received on 25 August 2026 it is understood that a new EIA process has commenced as the first application was null and void after the appeal was upheld by the Appeal Authority (DFFE). Therefore, the extended public participation process is in terms of a new EIA application submitted to the DMPR for the same project, i.e. the expansion of mining rights to include Block A and B"	The status of the appeal process has been concluded above. The below represents additional clarification and context with regard to the current process being undertaken: The Public Participation Process (PPP) supports the existing application that was lodged on 14 November 2024. At the request of the DMPR and in support of public engagement the Final Basic Assessment Report has been made available for further comment for a period of 30 Days. Due to the lapsing of statutory timeframes on the initial submission of the Final Basic Assessment Report (FBAR) and the conclusion of the Appeal Process, a new Application for Environmental Authorisation has been lodged with the Department of Mineral and Petroleum Resources (DMPR). While this is administratively a new application it pertains to the exact same mining footprint project scope, spatial footprint, and technical baseline and outcomes previously evaluated since 14 November 2025. In the 14 November 2024 application, the total area of expansion was 325.45ha, with mining operations focused on the Underground Shallows Blocks (A&B) measuring 33.91ha. This additional public participation process is only over 33.91ha of Blocks A&B as the rest of the area will no longer be included into the mining right of NW 80 MR for the Kwezi Mining Operations project. The S102 Application has been approved for the Underground Shallows Block (A&B). In accordance with the projected project timelines as discussed and agreed with the Regulatory Authority, the statutory cutoff date for the submission of the final report and the accompanying Comments and Responses Report (CRR) is 02 September 2026. Please take note that consulting on the Final Basic Assessment Report (FBAR) ensures full transparency. This does not take away from any I&APs right to comment and possibly alter the report currently within the public domain, not does it take away from the required 107 Day Regulatory Authority Review Period. This enables informed, meaningful input prior to submission to the DMPR. It is herewith confirmed that the 30-day review and comment period officially closes on 26 August 2026. We confirm that Mills & Otten (Pty) Ltd has up until 26 August 2026 to submit their written comments and inputs on behalf of Coca-Cola Beverages South Africa (Pty) Ltd. This was also formally communicated via email to Mills & Otten (Pty) Ltd on 20 August 2026
34	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Specialist studies "The list of specialist studies excludes many of the studies identified in the DFFE screening tool report on the basis that the expansion is of underground works and therefore impacts on surface would not be realised. The studies of relevance that have been included are Aquatic Biodiversity Impact Assessment: Freshwater Impact Assessment has been undertaken to determine the presence/absent of watercourses and the potential impacts of undermining these watercourses. Hydrology: The proposed project does not include any surface infrastructure. Stormwater Management in terms of the existing surface infrastructure at Kwezi Shaft exists. Seismicity Assessment: Blast and Stability Impact Assessment has been undertaken. It is specifically noted that there is no geohydrological assessment undertaken for the proposed expansion of the mining area into an area that has been developed on surface with	Attention is brought to the following sections within the Basic Assessment Report: - Environmental Statis Quo (Baseline) Section 7.9: Groundwater - Environmental Impact Assessment Section 8.3.6 Groundwater - Environmental Management Programme: Section 9.2 Groundwater EMP Commitments - Monitoring and Reporting: Section 10.6.1 Groundwater Monitoring - Appendix C4: Groundwater Impact Assessment as undertaken by MvB Consulting The assertion that no geohydrological assessment was undertaken is incorrect. A comprehensive Hydrogeological (Groundwater) Impact Assessment was conducted to evaluate the potential impacts of the proposed mining expansion on groundwater resources and surrounding surface boreholes. - The assertion is also contradictory to the queries as raised in Point 6 and 8 of the I&APs formal response in which specific reference is made to the Hydrogeological Aspects. The below provides a consolidated summary of the specialist studies that supported the application: - Appendix C1: Archaeological and cultural heritage impact assessment - Appendix C2: Freshwater Assessment - Appendix C3: Hydropedological Assessment - Appendix C4: Groundwater Impact Assessment - Appendix C5: Vibration, Blast and Stability Assessment



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			numerous boreholes. This is seen as shortcoming of the report.”	
35	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	It is understood that the WULA submitted in 2023 has not yet been approved, and includes: - Dewatering of the Kwezi Shaft – Section 21 (a) – This water use was authorised in the 2011 WUL, however, the abstraction volume needs to be increased. Volume applied for is 600 000 m3 - Dewatering of Kwezi Shaft – Section 21 (j) – Removing of water from underground is necessary for the efficient continuation of the mining activity for the safety of people. • - Undermining of the Dorpspruit and delineated wetland- Section (c) & (i). It is acknowledged in the report that the proposed expansion also triggers a Water Use License Application – no further information is available. The listed activities above are confusing as it would appear that Section 21(a) is for the water to be used (abstraction of water from a resource) however the activity is described as dewatering of Kwezi Shaft which is also listed as activity 21 (j). Clarity on the status of the existing application and details as to when the new application will be submitted is requested including the details of the applications. The report states the following: “The table below records the anticipated GN704 exemptions required and to be applied for in terms of the NWA to support the proposed expansion. This application (GN704 Exemption Motivation in terms of NWA) will run in parallel with the Basic Assessment and WULA Process. No person in control of a mine or activity may locate or place any residue deposit, dam, reservoir, together with any associated structure or any other facility within the 1:100 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, borehole or well, excluding boreholes or wells drilled specifically to monitor the pollution of groundwater, or on water-logged ground, or on ground likely to become water-logged, undermined, unstable or	It should be clarified that three Water Use License’s (WUL) bare relevance here: It is key to note that the Kwezi Shallows Block A&B Project will be supported by the existing Kwezi Shaft. (1) A Water Use Licence was issued for the K5 (Kwezi) operation on 24 June 2011 (Licence No: 03/A22H/AG/726) - This licence expired on 23 June 2020. However, an extension was requested on 22 June 2020, for an additional nine (9) years. This extension was granted on 11 June 2021. - A WUL Application submitted in 2023 –the WUL was issued on 7 November 2024. (Licence No. 06/A22H/ACGIJ/14646) - The following Water Uses were approved as part of this K5 (Kwezi) WUL: - Dewatering of the Kwezi Shaft – Section 21 (a) – This water use was authorised in the 2011 WUL, however, the abstraction volume needed to be increased. Volume applied for and approved is 600 000 m3 - Dewatering of Kwezi Shaft – Section 21 (j) – Removing of water from underground is necessary for the efficient continuation of the mining activity for the safety of people - Undermining of the Dorpspruit and delineated wetland- Section 21 c&i (2) An additional Water Use Licence Application Process was undertaken in support of the Block A & B expansion, which concluded on 18 June 2025. - Phase 1 Submission was undertaken on 15 October 2024 - Phase 3 Submission was undertaken on 07 February 2025 - The Water Use Licence was approved by the Department of Water and Sanitation on 18 June 2025 WUL Reference: 06/A22H/CGI/16533. - The following Water Uses were approved as part of this WUL: - Section 21(c) and (i): Impeding or diverting the flow of water within a water course. And altering the beds, banks, course or characteristics of a watercourse: Undertaking of mining activities within 500m of the delineated wetland. - Section 21 (g): Disposing of waste in a manner which may detrimentally impact on a water resource: Backfilling of the proposed Mining Block A&B - The following Regulation GN704 Exemptions were approved: - Regulation 4(a) Exemption Deposition of residue material in the underground working excavation up to and bordering a Channelled Valley Bottom wetland (CVB) Distance- 0m. - Regulation 4(b&c) Exemption which allows for: - Deposition of residue material in the underground workings excavation within the 1:50 year flood-line. - Underground mine development adjacent and up to and bordering a Channelled Valley Bottom Wetland (CVB) Distance- 0m. - The presence of mineral deposits governs the location of mining activities. SRPM holds a Mining Right for the Kwezi Shaft operations, hence the intention is expand on the existing operations to known PGM ore in the area. - Expansion of the Kwezi Operations is both environmentally and economically practical, as UG2 Shallow Blocks are adjacent to the existing Kwezi Mining Rights Area and can be accessed through the existing Kwezi Shaft. In specific response to the queries regarding the concerns surrounding the “Boreholes” - The assertion that no cognizance has been given to the proposed mining operation directly underneath facilities with boreholes is incorrect. - A comprehensive Hydrogeological (Groundwater) Impact Assessment was conducted to evaluate the potential impacts of the proposed mining expansion on groundwater resources and surrounding surface boreholes. - An initial hydrocensus was undertaken in support of the project on the 3rd of October 2024 during which twenty-eight (28) properties were visited. Twenty-five (25) boreholes were identified during this census. During the initial public participation process several

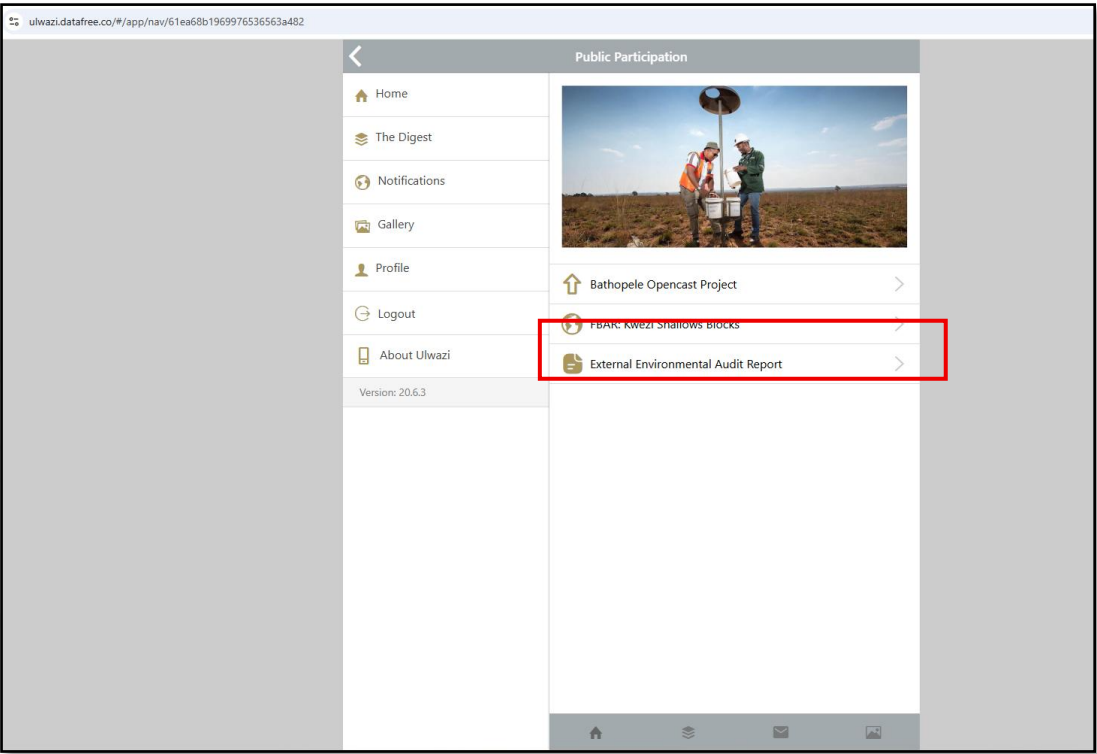


Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			cracked. And the applicability to the project is listed as: Underground mining activities within 100m from the watercourse Our own emphasis is to highlight that the proposed mining operation will be directly underneath facilities with boreholes on their properties and there is no cognisance of the legislated requirement.	landowners indicated that their boreholes were not shown on the list. Many of the properties had been sub-divided and more than one borehole has been drilled by the business owners. A follow-up hydrocensus was therefore undertaken in December 2024 and January 2025. A further thirteen (13) boreholes were located. Under the National Water Act (Act 36 of 1998), with specific reference to the approved WUL Reference: 06/A22H/CGI/16533 - Exemption from GN704 Regulation 4(a) gives recognition to the fact that activities are located within the 1: 100 year flood-line; or within a horizontal distance of 100 metres from any watercourse or estuary, borehole. - The Approved WUL has included the following binding conditions: - Required: Monitoring of drilled boreholes for groundwater level and quality - Required: Monitoring result submission to the Regulatory Authority - Required: Internal and External Auditing also to be submitted to the Regulatory Authority - Required: In the event surrounding groundwater is affected by the authorized water use activities, in terms of groundwater quantity and quality, due to depletion or contamination of groundwater resources, the groundwater users must be compensated with potable water. Under the National Environmental Management Act (Act 107 of 1998), with specific reference to the EMPr: AvDE (Pty) Ltd, would like to highlight that a comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. Groundwater monitoring will be conducted during the operational and closure phases of the project. Samples will be analysed by an independent, SANAS-accredited laboratory. The EMPr has the following extensive mitigation measures as it relates to Groundwater Management during all phases of the project: Operational Phase: - Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress. - 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. - 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. - 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. - 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. - 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. - The Numerical Flow and Contaminant Transport Model (groundwater model) must be updated every two years (in terms of the Life of Mine) with the most recent data and the results thereof shared with the affected users. - The dewatering pipeline and pumping system must be installed with a flow water at strategic places to accurately determine the amount of groundwater inflow into the underground mine workings. - The establishment of an Environmental Monitoring Committee with the potentially affected landowners. Quarterly meetings to be held, whereby the groundwater monitoring (quality and quantity) results are presented and discussed.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- Quarterly monitoring of drilled boreholes for groundwater quality aspects will be undertaken. - Dewatering qualities must be measured at the transfer and pollution control dams. - The results of the water quality monitoring will be used to verify the rate of movement of the groundwater pollution plume. - Machinery should be well maintained and properly operated. - Spills should be cleaned up immediately, and the relevant authorities notified in the event of a significant spill. - Contaminated material must either be stored on-site in an approved waste disposal area or removed by credible contractors. - The applicant must be responsible for compliance with the provisions for duly of care and remediation of environmental damage in accordance with Section 28 of the 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 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 IEM Policy 2023). Decommissioning & Closure Phase: - Post closure water quality impacts must be confirmed through the development of a 3-dimensional flood model to increase the confidence levels of the following: - Based on the updated geological information gathered during mining update the groundwater inflow mechanisms and inflow rates - Through predictive modelling predict the time it will take for the groundwater to rebound a flood / fill the void. - Through predictive modelling simulate the expected mine water quality over the long term post flooding. - Confirm the potential for long term decant post closure as well as the predicted location of the decant points/zone. - Confirmation of the expected decant quality and volumes. Predictive modelling should allow for different closure or partial closure scenarios. All Phases: - The site to implement a water management hierarchy of avoid, reuse, recycle as far as practically possible. - The development (if not in place), update (if in place) and implementation of awareness & training on this subject matter, EMP objectives and commitments to all permanent employees, contractors and visitors (where deemed necessary).
36	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	“Public Participation Process Reference is made in the report to several appendices labelled D1 – D14, however when accessing the public documents via the EAP’s website only D11 and D12 are available. How can meaningful participation be undertaken when not all the relevant information is made available?”	For context: D1 to D14 pertains to the supporting documentation records of the previous Public Participation Process that was undertaken in support of the FBAR. The assertion that interested and affected parties (I&APs) were denied access to relevant appendices or prevented from meaningfully participating in the public process is not supported by the documented record for the project. To ensure broad, equitable, and legally compliant access to all project documentation, including Appendices D1 through D14, the EAP made the complete report set available through multiple physical and digital platforms during the public review period: - Digital Platform (Data-Free): All appendices were hosted on Ulwazi, a zero-rated (data-free) digital platform, specifically to ensure members of the public could download the files without incurring internet data costs. - EAP Website: Files were loaded onto the EAP’s primary online repository. - Physical Public Inspection Sites: Full hard copies were placed at accessible public locations, including: - The local Public Library - The Kwezi Mine Security Office - EAP’s Offices Providing access across physical venues and a zero-rated platform ensures that any access barriers were removed, fulfilling the requirements of Regulation 41(6) of the EIA Regulations and the principles of fair administrative justice under PAJA.



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				Furthermore, all public notices, advertisements, and report cover pages explicitly provided direct contact details (email and telephone) for the Environmental Assessment Practitioner (EAP). Had the I&AP experienced any difficulty accessing specific annexures online, a simple request to the EAP would have resulted in the immediate electronic transmission (via email, Wettransfer, or Google Drive) or physical provision of Appendices. At no point during the public review period was a request for these specific documents received from the I&AP and subsequently denied. Significantly, the I&AP submitted formal correspondence to the EAP on 20 August 2026, yet failed to indicate or raise any issue regarding difficulty accessing files. Raising this as a procedural failure after the fact, despite active engagement, prior written correspondence, and continuous access via data-free and physical platforms, does not constitute a failure of the public participation process. 



The image displays two screenshots of the Ulwazi datafree.co application interface.

Top Screenshot: FBAR: Kwezi Shallows Blocks

- Header:** FBAR: Kwezi Shallows Blocks
- Sidebar Menu:**
 - Home
 - The Digest
 - Notifications
 - Gallery
 - Profile
 - Logout
 - About Ulwazi
 - Version: 20.6.3
- Main Content:**
 - Project:** FBAR: Kwezi Shallows Blocks
 - Document:** SIBANYE RUSTENBURG PLATINUM MINES (PTY) Ltd
 - Final Basic Assessment Report: PROPOSED AMENDMENT OF MINING RIGHT IN R 80 884 AND THE EXPANSION OF THE KWEZI MINING OPERATIONS THROUGH THE INCLUSION OF THE UG SHALLOWS BLOCKS (A&B) (August 2021)**
 - Text:** This Final Basic Assessment Report will be available for public comments for a period of 30 days: from the 27 July 2026 to 26 August 2026.
 - Document List:**
 - Final Basic Assessment Report
 - Appendix A: CV of the EAP
 - Appendix B: OFFE Screening Reports
 - Appendix C: Specialist Studies
 - Appendix D: Public Participation
 - Submit comments here** (highlighted with a red box)

Bottom Screenshot: Appendix D: Public Participation

- Header:** Appendix D: Public Participation
- Sidebar Menu:**
 - Home
 - The Digest
 - Notifications
 - Gallery
 - Profile
 - Logout
 - About Ulwazi
 - Version: 20.6.3
- Main Content:**
 - Appendix D1: Database
 - Appendix D2: Pre Application
 - Appendix D3: Site Notice
 - Appendix D4: Background Document
 - Appendix D5: Notice of Basic Assessment
 - Appendix D6: Knock and Drop Register
 - Appendix D7: Notice
 - Appendix D8: Registered Mail
 - Appendix D9: Focus Group - SAB
 - Appendix D10: Focus Group - Stakeholders
 - Appendix D11: Comments and Responses
 - Appendix D12: Comments
 - Appendix D13: Advert
 - Appendix D14: Minutes of FGM
 - Appendix D15: Responses

Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				It is also important to note that the EAP actively targeted and engaged this specific I&AP (Coca-Cola Beverages South Africa (Pty) Ltd) from the inception of the process (from 14 November 2024) to ensure their inclusion and participation. Claiming a total failure of meaningful engagement disregards these proactive efforts. This includes: Since the commencement on 14 November 2024, public engagement supporting the project (excluding the current extended PPP) included the following: • Site notices were placed on 3rd September and 12 September 2024. ◦ Site Notices was placed near the Coca-Cola Beverages South Africa (Pty) Ltd property (See Annexure B) • Background Information Document's ("BID") and Notification Letters was compiled and distributed electronically via email to adjacent landowners and all identified stakeholders. ◦ Background Information Document's ("BID") and Notification Letters was compiled and distributed electronically via email to Coca-Cola Beverages South Africa (Pty) Ltd (See Annexure B) ◦ The Hard copy of the BID was distributed on 3 and 12 September 2024 (Knock and Drops). ▪ Coca-Cola Beverages South Africa (Pty) Ltd formed part of the Knock and Drop exercise • 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. ◦ Notification emails and letters were sent to I&APs on 13 November 2024, informing stakeholders on the availability of the Draft Report. • Initial Draft Basic Assessment Report was made available for public comment from 14 November until 13 December 2024. ◦ This process was extended for commenting I&APs to 16 January 2025 • The undertaking of the Hydrocensus; and • The process was also supported by a SRPM communication platform Note that various documented proof has been appended (Annexure B) to this formal Response. It is noted that Coca-Cola Beverages South Africa (Pty) Ltd, although specifically targeted by the EAP, did not formally register nor raise any formal comment during the initial public participation process as held from 14 November until 13 December 2024. Appendices D1 through D14, has been continuously available across multiple physical and digital platforms since 14 November 2025. Since the commencement of the public participation process from 22 July to 26 August 2026, public engagement supporting the project included the following: • Site notices were placed on 3rd September and 12 September 2024. ◦ Site Notices was placed near the Coca-Cola Beverages South Africa (Pty) Ltd property (See Annexure C) • Background Information Document's ("BID") and Notification Letters was compiled and distributed electronically via email to adjacent landowners and all identified stakeholders. ◦ Background Information Document's ("BID") and Notification Letters was compiled and distributed electronically via email to Coca-Cola Beverages South Africa (Pty) Ltd • A newspaper advertisement was placed in the Rustenburg Herald newspaper on the 24 July 2026 edition announcing the availability of the BAR.
37	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	"Hydrocensus The results of the hydrocensus are presented in section 7.9.4 of the report. The report states that 25 boreholes were identified in the area (predominantly in the industrial area). CCBSA has records of communication regarding the borehole on their property and an indication that specialists would be undertaking studies of the borehole on the property and the necessary safety procedures to be followed. This was done in August 2025 and after the last communication nothing further happened. It is noted that the	An initial hydrocensus was undertaken in support of the project on the 3rd of October 2024 during which twenty-eight (28) properties were visited. Twenty-five (25) boreholes were identified during this census. During the initial public participation process several landowners indicated that their boreholes were not shown on the list. Many of the properties had been sub-divided and more than one borehole has been drilled by the business owners. A follow-up hydrocensus was therefore undertaken in December 2024 and January 2025. A further thirteen (13) boreholes were located. • The Coca-Cola Beverages South Africa (Pty) Ltd borehole was noted as CBH1: Coca Cola, 6 Brons Street and has been included within the updated Hydrocensus Report.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			borehole on the CCBSA property is not included in the hydrocensus data on the map or the table. This is considered a major flaw in the report that could be considered intentional obfuscation.” “The assessment of 6 boreholes identified during the hydrocensus indicates borehole depths between 20 – 70 metres. All but one of these boreholes will be intersected by the mining activity. All boreholes indicated good yields with recommended abstraction rates between 55 – 486m³ per day. It is again noted that the borehole at CCBSA premises was to be tested and after all arrangements were made, the test was never undertaken.”	Appendix C2_Wetland Assessment Appendix C3_Hydropedological Opinion Appendix C4_Groundwater Impact Assessment Groundwater Impact Assessment



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abstraction</td><td>9.75</td><td>1138.40</td></tr><tr><td>BH23</td><td>-25.62760</td><td>27.23150</td><td>1147.07</td><td>Glencore</td><td>30</td><td>Monitoring</td><td>No abstraction</td><td>8.82</td><td>1138.25</td></tr><tr><td>BH24</td><td>-25.62970</td><td>27.23020</td><td>1149.60</td><td>SAB</td><td>70</td><td>Domestic</td><td>1.45</td><td>8.97</td><td>1140.63</td></tr><tr><td>BH25</td><td>-25.63930</td><td>27.23203</td><td>1142.52</td><td>Ruscon Investments</td><td>30</td><td>Commercial</td><td>1.38</td><td>2.95</td><td>1139.57</td></tr><tr><td>BH26</td><td>-25.63772</td><td>27.22785</td><td>1152.00</td><td>Rustenburg Engineering and Foundry</td><td>30</td><td>Production</td><td>2.00</td><td>6.40</td><td>1145.60</td></tr><tr><td>BH27</td><td>-25.63039</td><td>27.23268</td><td>1146.00</td><td>Northwest Recycling</td><td>31</td><td>Commercial</td><td>0.40</td><td>7.80</td><td>1138.20</td></tr><tr><td>BH28</td><td>-25.63027</td><td>27.23452</td><td>1144.00</td><td>Northwest Recycling</td><td>42</td><td>Monitoring</td><td>Unknown</td><td>7.05</td><td>1136.95</td></tr><tr><td>BH29</td><td>-25.63021</td><td>27.23444</td><td>1144.00</td><td>Northwest Recycling</td><td>45</td><td>Commercial/domestic</td><td>1.30</td><td>7.50</td><td>1136.50</td></tr><tr><td>BH30</td><td>-25.63501</td><td>27.23777</td><td>1140.95</td><td>Professional Clothing</td><td>75</td><td>Industrial/domestic</td><td>1.38</td><td>16.80</td><td>1124.20</td></tr><tr><td>BH31</td><td>-25.63505</td><td>27.23782</td><td>1138.43</td><td>Professional Clothing</td><td>45</td><td>Industrial/domestic</td><td>1.38</td><td>1.17</td><td>1136.83</td></tr><tr><td>BH32</td><td>-25.63477</td><td>27.23252</td><td>1147.97</td><td>RCL Foods (BH 1)</td><td>50</td><td>Not in use</td><td>Unknown</td><td>6.74</td><td>1141.26</td></tr><tr><td>BH33</td><td>-25.63472</td><td>27.23307</td><td>1144.33</td><td>RCL Foods (BH 2)</td><td>45</td><td>Irrigation</td><td>Unknown</td><td>5.88</td><td>1138.12</td></tr><tr><td>BH34</td><td>-25.63830</td><td>27.23317</td><td>1154.06</td><td>RCL Foods (BH 3)</td><td>35</td><td>Irrigation</td><td>Unknown</td><td>6.68</td><td>1147.32</td></tr><tr><td>BH35</td><td>-25.62852</td><td>27.22648</td><td>1140.96</td><td>VK Chrome Processing</td><td>40</td><td>Commercial</td><td>1.38</td><td>23.12</td><td>1117.84</td></tr><tr><td>BH35A</td><td>-25.62902</td><td>27.22510</td><td>1145.37</td><td>VK Chrome Processing</td><td>75</td><td>Commercial</td><td>1.66</td><td>10.23</td><td>1135.14</td></tr><tr><td>BH35B</td><td>-25.63211</td><td>27.22779</td><td>1143.55</td><td>VK Chrome Processing</td><td>50</td><td>Commercial</td><td>Unknown</td><td>7.30</td><td>1136.25</td></tr><tr><td>BH35C</td><td>-25.63149</td><td>27.22754</td><td>1142.92</td><td>VK Chrome Processing</td><td>45</td><td>Commercial</td><td>Unknown</td><td>7.54</td><td>1135.38</td></tr><tr><td>KW1</td><td>-25.63503</td><td>27.23836</td><td>1135.00</td><td>North West Granite Slab Sales</td><td>45</td><td>Industrial</td><td>1.11</td><td>4.3</td><td>1130.70</td></tr><tr><td>KW2</td><td>-25.63530</td><td>27.23802</td><td>1137.00</td><td>Boeties Auto</td><td>70</td><td>Industrial</td><td>0.03</td><td>28.64</td><td>1108.36</td></tr><tr><td>KW3</td><td>-25.63566</td><td>27.23761</td><td>1134.00</td><td>SANY</td><td>60</td><td>Industrial</td><td>0.17</td><td>3.51</td><td>1130.49</td></tr><tr><td>CBH1</td><td>-25.63418</td><td>27.23804</td><td>1139.00</td><td>Coca-Cola</td><td>35</td><td>Industrial</td><td>Unknown</td><td>7.44</td><td>1131.56</td></tr></tbody></table> <table><thead><tr><th>Borehole ID</th><th>Owner</th><th>Pump Tested</th><th>Borehole Sampled</th><th>Comment</th></tr></thead><tbody><tr><td>BH31</td><td>Professional Clothing</td><td>No</td><td>Yes</td><td>Owner 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borehole</td></tr><tr><td>KW3</td><td>SANY</td><td>Yes</td><td>Yes</td><td>Tested</td></tr><tr><td>CBH1</td><td>Coca-Cola</td><td>Yes</td><td>Yes</td><td>Tested</td></tr></tbody></table>	Borehole ID	Coordinates			Owner	Borehole Depth [m]	Borehole Use and Abstraction		Hydrogeological information		Latitude	Longitude	Elevation [mams]	Primary Use [-]	Abstraction Rate [L/s]	Static Water Level										[mbgl]	[mams]	BH21	-25.62680	27.23100	1147.01	Glencore	30	Monitoring	No abstraction	8.08	1138.93	BH22	-25.62770	27.23040	1148.15	Glencore	30	Monitoring	No abstraction	9.75	1138.40	BH23	-25.62760	27.23150	1147.07	Glencore	30	Monitoring	No abstraction	8.82	1138.25	BH24	-25.62970	27.23020	1149.60	SAB	70	Domestic	1.45	8.97	1140.63	BH25	-25.63930	27.23203	1142.52	Ruscon Investments	30	Commercial	1.38	2.95	1139.57	BH26	-25.63772	27.22785	1152.00	Rustenburg Engineering and Foundry	30	Production	2.00	6.40	1145.60	BH27	-25.63039	27.23268	1146.00	Northwest Recycling	31	Commercial	0.40	7.80	1138.20	BH28	-25.63027	27.23452	1144.00	Northwest Recycling	42	Monitoring	Unknown	7.05	1136.95	BH29	-25.63021	27.23444	1144.00	Northwest Recycling	45	Commercial/domestic	1.30	7.50	1136.50	BH30	-25.63501	27.23777	1140.95	Professional Clothing	75	Industrial/domestic	1.38	16.80	1124.20	BH31	-25.63505	27.23782	1138.43	Professional Clothing	45	Industrial/domestic	1.38	1.17	1136.83	BH32	-25.63477	27.23252	1147.97	RCL Foods (BH 1)	50	Not in use	Unknown	6.74	1141.26	BH33	-25.63472	27.23307	1144.33	RCL Foods (BH 2)	45	Irrigation	Unknown	5.88	1138.12	BH34	-25.63830	27.23317	1154.06	RCL Foods (BH 3)	35	Irrigation	Unknown	6.68	1147.32	BH35	-25.62852	27.22648	1140.96	VK Chrome Processing	40	Commercial	1.38	23.12	1117.84	BH35A	-25.62902	27.22510	1145.37	VK Chrome Processing	75	Commercial	1.66	10.23	1135.14	BH35B	-25.63211	27.22779	1143.55	VK Chrome Processing	50	Commercial	Unknown	7.30	1136.25	BH35C	-25.63149	27.22754	1142.92	VK Chrome Processing	45	Commercial	Unknown	7.54	1135.38	KW1	-25.63503	27.23836	1135.00	North West Granite Slab Sales	45	Industrial	1.11	4.3	1130.70	KW2	-25.63530	27.23802	1137.00	Boeties Auto	70	Industrial	0.03	28.64	1108.36	KW3	-25.63566	27.23761	1134.00	SANY	60	Industrial	0.17	3.51	1130.49	CBH1	-25.63418	27.23804	1139.00	Coca-Cola	35	Industrial	Unknown	7.44	1131.56	Borehole ID	Owner	Pump Tested	Borehole Sampled	Comment	BH31	Professional Clothing	No	Yes	Owner allowed the sampling, but not the testing of the boreholes	BH32	RCL Foods (BH 1)	No	Yes	Owner allowed the sampling, but not the testing of the boreholes	BH33	RCL Foods (BH 2)	No	Yes	BH34	RCL Foods (BH 3)	No	Yes	BH35	VK Chrome Processing	Yes	Yes	Tested	BH35A	VK Chrome Processing	Yes	Yes	Tested	BH35B	VK Chrome Processing	Yes	Yes	Tested	BH35C	VK Chrome Processing	Yes	Yes	Tested	KW1	Tombstones	Yes	Yes	Tested	KW2	Boeties Auto	No	Yes	Owner allowed the sampling, but not the testing of the borehole	KW3	SANY	Yes	Yes	Tested	CBH1	Coca-Cola	Yes	Yes	Tested
Borehole ID	Coordinates			Owner		Borehole Depth [m]	Borehole Use and Abstraction				Hydrogeological information																																																																																																																																																																																																																																																																																																															
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BH21	-25.62680	27.23100	1147.01	Glencore	30	Monitoring	No abstraction	8.08	1138.93																																																																																																																																																																																																																																																																																																																	
BH22	-25.62770	27.23040	1148.15	Glencore	30	Monitoring	No abstraction	9.75	1138.40																																																																																																																																																																																																																																																																																																																	
BH23	-25.62760	27.23150	1147.07	Glencore	30	Monitoring	No abstraction	8.82	1138.25																																																																																																																																																																																																																																																																																																																	
BH24	-25.62970	27.23020	1149.60	SAB	70	Domestic	1.45	8.97	1140.63																																																																																																																																																																																																																																																																																																																	
BH25	-25.63930	27.23203	1142.52	Ruscon Investments	30	Commercial	1.38	2.95	1139.57																																																																																																																																																																																																																																																																																																																	
BH26	-25.63772	27.22785	1152.00	Rustenburg Engineering and Foundry	30	Production	2.00	6.40	1145.60																																																																																																																																																																																																																																																																																																																	
BH27	-25.63039	27.23268	1146.00	Northwest Recycling	31	Commercial	0.40	7.80	1138.20																																																																																																																																																																																																																																																																																																																	
BH28	-25.63027	27.23452	1144.00	Northwest Recycling	42	Monitoring	Unknown	7.05	1136.95																																																																																																																																																																																																																																																																																																																	
BH29	-25.63021	27.23444	1144.00	Northwest Recycling	45	Commercial/domestic	1.30	7.50	1136.50																																																																																																																																																																																																																																																																																																																	
BH30	-25.63501	27.23777	1140.95	Professional Clothing	75	Industrial/domestic	1.38	16.80	1124.20																																																																																																																																																																																																																																																																																																																	
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BH32	-25.63477	27.23252	1147.97	RCL Foods (BH 1)	50	Not in use	Unknown	6.74	1141.26																																																																																																																																																																																																																																																																																																																	
BH33	-25.63472	27.23307	1144.33	RCL Foods (BH 2)	45	Irrigation	Unknown	5.88	1138.12																																																																																																																																																																																																																																																																																																																	
BH34	-25.63830	27.23317	1154.06	RCL Foods (BH 3)	35	Irrigation	Unknown	6.68	1147.32																																																																																																																																																																																																																																																																																																																	
BH35	-25.62852	27.22648	1140.96	VK Chrome Processing	40	Commercial	1.38	23.12	1117.84																																																																																																																																																																																																																																																																																																																	
BH35A	-25.62902	27.22510	1145.37	VK Chrome Processing	75	Commercial	1.66	10.23	1135.14																																																																																																																																																																																																																																																																																																																	
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BH35C	-25.63149	27.22754	1142.92	VK Chrome Processing	45	Commercial	Unknown	7.54	1135.38																																																																																																																																																																																																																																																																																																																	
KW1	-25.63503	27.23836	1135.00	North West Granite Slab Sales	45	Industrial	1.11	4.3	1130.70																																																																																																																																																																																																																																																																																																																	
KW2	-25.63530	27.23802	1137.00	Boeties Auto	70	Industrial	0.03	28.64	1108.36																																																																																																																																																																																																																																																																																																																	
KW3	-25.63566	27.23761	1134.00	SANY	60	Industrial	0.17	3.51	1130.49																																																																																																																																																																																																																																																																																																																	
CBH1	-25.63418	27.23804	1139.00	Coca-Cola	35	Industrial	Unknown	7.44	1131.56																																																																																																																																																																																																																																																																																																																	
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BH33	RCL Foods (BH 2)	No	Yes																																																																																																																																																																																																																																																																																																																							
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BH35	VK Chrome Processing	Yes	Yes	Tested																																																																																																																																																																																																																																																																																																																						
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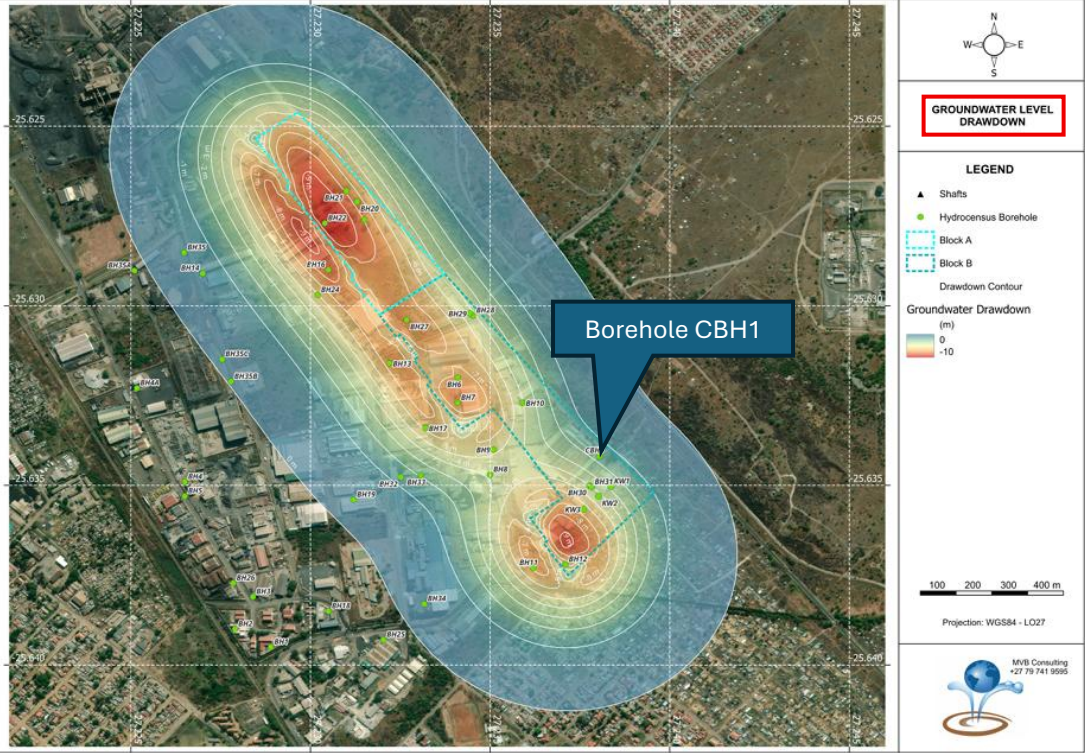


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38	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Seismic Stability “The report describes in detail the possible impact of surface structures based on the proposed mining method; however it does not consider the nature of structures on surface or the depth of the foundations of structures. The statement is made that the shallowest mining would be at 40m, however this separation may be far less, depending on foundation depths. The calculations of any impact should be re-worked based on specific information relating to each property”	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 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. - 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. - 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.																																																																																																																																																																																										

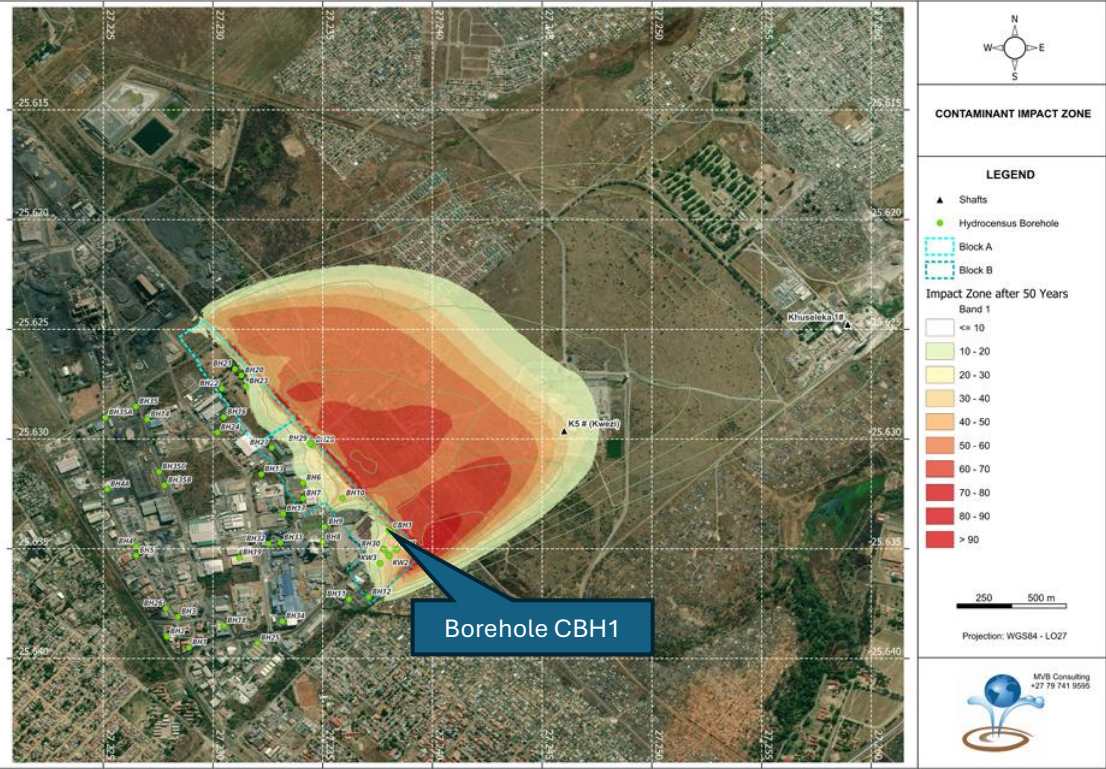


Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				- In terms of Blast and vibration, blasting will be undertaken as part of the mining activities. Undermining surface structures by means of drilling and blasting will result in the said surface structures experiencing some 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. - 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. - 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. - SRPM commits to identify, in collaboration with CCBSA, to identify CCBSA's infrastructure areas of concerns, and SRPM commits to undertake a structural assessment of the identified infrastructure prior to the commencement of underground mining activities.
39	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	Groundwater & Geohydrological Impact "The report states that the primary risk that the proposed mining extension poses is the risk of dewatering and disruption of private groundwater supply. The report indicates the potential groundwater drawdown in the area and it is noted that this is predicted to be the most severe in proximity to the CCBSA premises, even though there is no acknowledgment of the borehole on the premises. The mining operation is estimated to be 5 years and recovery of water levels will commence about 1,5 years thereafter and take up to 15 years to fully recover. This would mean that for the next 20 years the boreholes would be at risk of being dry and no water supply would be available."	Appendix C2.Wetland Assessment Appendix C3.Hydrogeological Opinion Appendix C4.Groundwater Impact Assessment Groundwater Impact Assessment The November 2025 Hydrogeological report was subsequently updated in January 2026 to further improve the confidence level: the updated study developed a new numerical groundwater model for the study area, with specific attention to the proposed mining extension. The newly acquired test pumping results and aquifer parameters were incorporated into the model. The map displays an aerial view of the study area with various boreholes marked by blue dots and numbered. A yellow dashed line outlines the 'Kwezi Mining Right Expansion'. A red solid line indicates the 'Kwezi Mining Right'. A blue callout box points to 'Borehole CBH1'. The map includes a north arrow, a scale bar (0 to 400 m), and a legend. The legend identifies symbols for Shafts, Hydrocensus Borehole, Block A, Block B, Kwezi Mining Right Expansion, and Kwezi Mining Right. The map is projected using WGS84 - LQ27.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				 GROUNDWATER LEVEL DRAWDOWN LEGEND ▲ Shafts ● Hydrocensus Borehole □ Block A □ Block B — Drawdown Contour - Groundwater Drawdown (m) 0 -10 100 200 300 400 m Projection: WGS84 - LO27 MVB Consulting +27 79 741 9995 • The groundwater level over the mining blocks is expected to drop to the mining elevation, approximately 10 m. The extent of the impact is within a radius of approximately 450m 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. <u>None of the boreholes are expected to be significantly affected and none of the boreholes will dry-up.</u> ○ BH22, owned by Glencore, is located within the worst affected area and it is modelled that it will take approximately 3.5 years to fully recover post-closure



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
				 A concern was raised by the landowners on the possibility of groundwater contamination from the mining activities. The only mining related contaminant source that can potentially impact on the groundwater is after mine closure when the mine fills with water. The geochemical assessment, however, indicated that there are no chemicals of concern expected in the flooded mine workings. The potential impact from the mine, should any unexpected contamination occur, was therefore modelled as a percentage of the source concentration, rather than a specific contaminant parameter. This way the impacts can be related to a wide range of parameters by using the percentage of the source parameter concentration. <u>It is evident that in the unlikely event of contamination occurring, the plume migration will be in a north-easterly direction, away from the industrial area. There are no other groundwater users within the expected contaminant migration path. The proposed mining extension is not expected to impact on the groundwater quality in the private boreholes within the industrial area.</u> SRPM, the Hydrocensus and the Hydrogeological Impact Assessment is aware and has taken into consideration the identified borehole for the Coca-Cola Beverages South Africa (Pty) Ltd property (CBH1).
40	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	"The Rustenburg Local Municipality has a notorious record for a reliable water supply and as is evident by the number of boreholes in the area, industry has had to make an alternative plan to ensure water security in order for business to continue. The report states: The potential lowering of the groundwater level is regarded as the most significant risk associated with this project. It has the	Within the updated January 2026 Hydrogeological Report, the following was concluded: - None of the boreholes are expected to be significantly affected and none of the boreholes will dry-up. - The proposed mining extension is not expected to impact on the groundwater quality in the private boreholes within the industrial area However: - 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. Any 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.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			potential to impact on private groundwater users, who are solely reliant upon groundwater as their only source of water. If, however, the mitigation measures are implemented this risk can be greatly reduced. The potential impact on the groundwater quality is regarded as low and only continued monitoring is recommended. It is considered disingenuous to state that the lowering of the groundwater level is the most significant impact and the very next sentence to state the potential impact is low and monitoring is recommended. This is not an acceptable mitigation measure given the reliance of CCBSA and other parties on groundwater for their supply of water. In the EMPR the following statement is made in terms of mitigation of this impact: “SRPM to compile a Monitoring and Management Plan which shall be discussed with the potentially affected landowner owners prior to the undertaking of mining activities.” It is believed that this plan should be derived before the extension of the mining right is approved. The loss of water supply is a critical issue that will directly affect many businesses that employ numerous people and intend to do so for an extended period of time, not just 5 years like the proposed mining operation.”	The assertion that “<i>This is not an acceptable mitigation measure given the reliance of CCBSA and other parties on groundwater for their supply of water.</i>” does not give consideration to the extensive mitigation measures as included within the EMPr. AvDE (Pty) Ltd, would again like to highlight that a comprehensive groundwater monitoring system will be implemented to track environmental conditions and possible risk for impact. A groundwater monitoring and management plan has been compiled and included as part of the EMPr which becomes a legally binding documentation against which site compliance is tracked. The detailed mitigation measures for the operational and closure phase has been greatly detailed in the responses above (please refer to the responses given above)
41	25 August 2026 Formal Letter and Email	Kirstin Otten (Mills & Otten (Pty) Ltd on behalf of Coca-Cola Beverages South Africa (Pty) Ltd	From the EMP the following mitigation is noted: “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. - 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.	While the stakeholder's concern is acknowledged, the statement that operational mitigations are rendered meaningless is technically inaccurate based on the hydrogeological assessment. As detailed in the responses above: - The EAP targeted and engaged CCBSA from the inception of the process to ensure there was an opportunity for their interests and concerns to be evaluated. - Both SRPM and the geohydrological specialist were aware of the CCBSA property borehole (CBH1) and took its presence into account in the undertaking of the Hydrocensus as well as the compilation of the Groundwater Impact Assessment. - To ensure complete transparency, borehole CBH1 has been explicitly mapped and cataloged. The mitigation measures, monitoring commitments, and management frameworks in Section 9.2 of EMPr remain scientifically sound, directly applicable, and legally enforceable to protect CCBSA's groundwater interest.



Nr.	Date and Source	Commentator and Organisation	Comment/Question	Responses
			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 the CCBSA borehole is not included in the hydrocensus, even though there was significant communication regarding the testing of the borehole, the above mitigation for the operational phase is considered meaningless for CCBSA.”	



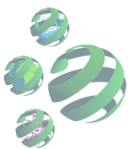
Appendix D11_CRR

1st PPP (14 November until 13 December 2024)

ALTA VAN DYK ENVIRONMENTAL CONSULTANTS (PTY) LTD

Project Reference Number: 1074427

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**Alta van Dyk
Corporate Group**



**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

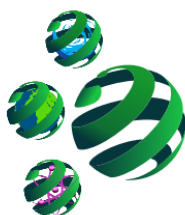
TECHNICAL DIRECTOR: ALTA VAN DYK

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:

A handwritten signature in black ink, appearing to read "Reata Colyn", is positioned above the signature line.



**Alta van Dyk
Corporate Group**



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.

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					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	Groundwater 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
		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	Blast and 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 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.
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.

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					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.

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					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. <i>Management and Monitoring Plan</i> 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.

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					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. <u>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 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. <u>Draft Basic Assessment Response</u> 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. <u>Groundwater/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 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.

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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.

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					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.

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					<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 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: - Section number 1 in the Glenlore Scheme situated at Portion 37 of Erf 2447, Rustenburg Extension 9 Township; - 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 H2SO4 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 (bmotsodisa@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: <i>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.</i> Listing Notice I, Activity 34: <i>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.</i> 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. 107 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. <table><tr><th>Parameter</th><th>RPM WUL 2018</th><th>Drinking Water</th><th>Underground Mine Void</th></tr><tr><td>pH</td><td>6-9.5</td><td>≥5 to ≤9.7</td><td>7.8</td></tr><tr><td>Total Dissolved Solids</td><td></td><td>≤1 200</td><td>740</td></tr><tr><td>Calcium</td><td><150</td><td></td><td>241</td></tr><tr><td>Sodium</td><td></td><td></td><td>52</td></tr><tr><td>Potassium</td><td></td><td></td><td>5</td></tr><tr><td>Magnesium</td><td></td><td></td><td>38</td></tr><tr><td>Bicarbonate</td><td></td><td></td><td>26</td></tr><tr><td>Sulphate</td><td><200</td><td>≤500</td><td>378</td></tr><tr><td>Chloride</td><td><200</td><td>≤300</td><td>41</td></tr><tr><td>Nitrate</td><td><10</td><td>≤11</td><td>0.2</td></tr></table>	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
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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. 107 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: - Construction of Permanent or Temporary Access(es) from any of the Provincial roads. - Construction of any structures e.g. Buildings along any of the Provincial roads. - Closing and or Deviation of section(s) of the Provincial roads. - Erection of Advertisements along the Provincial roads. - Working inside the Road Reserves of any of the Provincial roads. - 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 <i>Departmental Roads Engineer/ Manager</i>. 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 <i>Department of Public Works and Roads (DPWR)</i> 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>i.e. 15 from the road reserve boundary</i>). 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 <i>still</i> 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 DMPP 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.

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		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. - 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

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					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. <table><tr><th>Parameter</th><th>RPM WUL 2018</th><th>Drinking Water</th><th>Underground Mine Void</th></tr><tr><td>pH</td><td>6-9.5</td><td>≥5 to ≤9.7</td><td>7.8</td></tr><tr><td>Total Dissolved Solids</td><td></td><td>≤1 200</td><td>740</td></tr><tr><td>Calcium</td><td><150</td><td></td><td>241</td></tr><tr><td>Sodium</td><td></td><td></td><td>52</td></tr><tr><td>Potassium</td><td></td><td></td><td>5</td></tr><tr><td>Magnesium</td><td></td><td></td><td>38</td></tr><tr><td>Bicarbonate</td><td></td><td></td><td>26</td></tr><tr><td>Sulphate</td><td><200</td><td>≤500</td><td>378</td></tr><tr><td>Chloride</td><td><200</td><td>≤300</td><td>41</td></tr><tr><td>Nitrate</td><td><10</td><td>≤11</td><td>0.2</td></tr><tr><td>Ammonium</td><td></td><td>≤1.5</td><td><0.001</td></tr><tr><td>Aluminium</td><td></td><td>≤0.3</td><td><0.001</td></tr><tr><td>Iron</td><td></td><td>≤2</td><td><0.001</td></tr><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></table> <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.	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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					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 parties are not able to attend or be represented.			
2	Le Roux Eckardt	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	Concerns Regarding our client's borehole 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. Concerns about Structural Integrity 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. Impact on Insurance Cover SRPM is investigating options to address the matter and they we will reach out as soon as we have information. Compliance with Environmental and Water Laws 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 DMPP'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 DMPP 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 DMPP for decision making. <u>Request for Response</u> A meeting was set up by SRPM and AvDE with Le Roux Eckard 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

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					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. <table><tr><th>Parameter</th><th>RPM WUL 2018</th><th>Drinking Water</th><th>Underground Mine Void</th></tr><tr><td>pH</td><td>6-9.5</td><td>≥5 to ≤9.7</td><td>7.8</td></tr><tr><td>Total Dissolved Solids</td><td></td><td>≤1 200</td><td>740</td></tr><tr><td>Calcium</td><td><150</td><td></td><td>241</td></tr><tr><td>Sodium</td><td></td><td></td><td>52</td></tr><tr><td>Potassium</td><td></td><td></td><td>5</td></tr><tr><td>Magnesium</td><td></td><td></td><td>38</td></tr><tr><td>Bicarbonate</td><td></td><td></td><td>26</td></tr><tr><td>Sulphate</td><td><200</td><td>≤500</td><td>378</td></tr><tr><td>Chloride</td><td><200</td><td>≤300</td><td>41</td></tr><tr><td>Nitrate</td><td><10</td><td>≤11</td><td>0.2</td></tr><tr><td>Ammonium</td><td></td><td>≤1.5</td><td><0.001</td></tr><tr><td>Aluminium</td><td></td><td>≤0.3</td><td><0.001</td></tr><tr><td>Iron</td><td></td><td>≤2</td><td><0.001</td></tr><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></table> • 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.	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
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																																																																						
		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	Reiteration of Our Client’s Concerns - 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. Request for Confirmation of Mitigation Measures 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: - 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. • 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.			<i>“Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress”.</i> - 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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:

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					- Sibanye-Stillwater to monitor water levels to ensure management actions, should levels drop - Water quality to be monitored in all the identified boreholes
		- 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. - 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. - 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 - Requested SS provide assurances to Euro Sales, should Euro Sales suffer from loss or damages as a result of the mining activities. - SS should be able to provide assurance readily if the risks to Euro Sales property are as minimal as stated by SS. - 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 Eckardt 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 - 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. - 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. - 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: <i>"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".</i> - 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. <i>"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".</i> - 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. <i>"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".</i> - 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. If 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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. <i>“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”.</i> - 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

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		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 be 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 Eckardt 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: <i>"Sealing of water ingress point by grouting of the fault and dyke geological fractures as to reduce fissure water ingress".</i> - 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. <i>"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".</i> - 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. <i>"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</i>

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		• 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 client’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			<i>baseline data as to determine when existing groundwater sources of existing users require mitigation and replacement”.</i> ○ 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. • <i>“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”.</i> ○ 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. • <i>“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”.</i> ○ 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. • <i>“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”.</i> ○ 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: 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. 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. 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> <i>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.</i> <i>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:</i> <i>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.</i> <i>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.</i> <i>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.</i> <i>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,</i>
		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 mine 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.

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		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. 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.
		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.			
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: - We have internal planning sessions in the days up to 13 December to define the solutions to all water management concerns. - 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 jeopardise the EA process, which we want to avoid at all costs. - 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 Kirithi 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): Cemblocks Pty Ltd Address: 18 Vanadium Street, Rustenburg Formscaff (Part of the WACO International Group) Address: No. 3 Ferro Street, Rustenburg 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: 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. 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 amenable 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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6	Arthur Cockcroft	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.
		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): <i>19. Submission of the basic assessment report and supporting documents to the competent authority. —</i> <i>(1) Where basic assessment must be applied to an application, the applicant must, within <u>90 days</u> of receipt of the application by the competent authority, give to the competent authority—</i> <i>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 <u>30 days</u> and which reflects the incorporation of comments received, including any comments of the competent authority; or</i> 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 <u>13 December 2024</u> 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	<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. 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

Nr.	Organisation/Commentator	Comment	Date	Source	Response
		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).

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. <table><tr><th>Parameter</th><th>RPM WUL 2018</th><th>Drinking Water</th><th>Underground Mine Void</th></tr><tr><td>pH</td><td>6-9.5</td><td>≥5 to ≤9.7</td><td>7.8</td></tr><tr><td>Total Dissolved Solids</td><td></td><td>≤1 200</td><td>740</td></tr></table>	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
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.

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					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>

Nr.	Organisation/Commentator	Comment	Date	Source	Response
					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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					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.

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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).

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					<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. 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.			
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			
				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.