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<i>EIMS Ref</i>	1658	<i>Project Name</i>	HARMONY MPONENG LOWER COMPARTMENT TAILINGS STORAGE FACILITY

MEETING DETAILS

Meeting	Focus Group Meeting		
Meeting Venue	Microsoft Teams	Date	2025/10/10
		Time	09H30 – 10H30
<p><i>A virtual Focus Group Meeting was scheduled with Mariette Liefferink, a representative of Federation for a Sustainable Environment (FSE). The aim of the meeting was to engage Mariette as part of the public participation process for the Harmony Mponeng lower compartments Tailings Storage Facility (EIA). Specifically, the session aimed at discussing the Scoping Report, providing clarifications or additional information to concerns and/or questions as well as recording the comments for formal response and to add to the comments and responses as part of the public participation for the project.</i></p>			

MEETING ATTENDEES / REGISTER

Attendee	Company / Organization	Email Address
Hlayiseko Mashaba (HM)	Harmony Gold Mining Company Ltd	[REDACTED]
Brian Whitfield (BW)	Harmony Gold Mining Company Ltd	[REDACTED]
Suryana van Huyssteen (SvH)	Harmony Gold Mining Company Ltd	[REDACTED]
Mariette Liefferink (ML)	Federation for a Sustainable Environment	[REDACTED]
Vukosi Mabunda (VM)	Environmental Impact Management Services (Pty) Ltd	vukosi@eims.co.za
Mbali Tshabalala (MT)	Environmental Impact Management Services (Pty) Ltd	mbali@eims.co.za

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1	<p>Presentation</p> <p>There was no presentation as ML noted that the project is currently in the scoping phase and the report is out for public review and comments. The panel agreed to skip the presentation and focus on comments, concerns and/or questions.</p>
2	Questions / Comments and Responses

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	The following is a summary of the comments and questions that were recorded during the proceedings of the meeting and the responses provided.
a.	<p>Comment / Concern / Question & Responses – Responsibilities for Closure and Rehabilitation</p> <p>ML Raised concerns regarding complex corporate structures, since the applicant was a subsidiary of Harmony Gold which is Golden Core Trade and Invest (Pty) Ltd. Specifically, her concern was regarding the responsible party for closure and rehabilitation of the Tailings Storage Facility (TSF) once it reaches its Life of Mine (LoM).</p> <p>HM responded that Harmony Gold Mining only purchased the Mponeng Operations in 2020. So as part of the process, they established a number of subsidiaries. HM explained that the mining right that is related to the Mponeng Operations is through Golden Core Trade and Invest (Pty) Ltd, along with all the liabilities. HM further explained that their rehabilitation trust fund which also includes Golden Core Trade and Invest (Pty) Ltd will be responsible for rehabilitation purposes.</p> <p>ML emphasised that the main concern, which has been proved through the draft national mine closure strategy is that when a subsidiary has financial constraints the parent companies tend to divest themselves from the subsidiaries. ML further indicated that parent companies tend to follow this approach so that the company can avoid taking accountability for non-compliance and other related things. ML further requested that this be noted as a matter of concern by the applicant. VM indicated that the concern has been noted.</p>
b.	<p>Comment / Concern / Question & Responses – Alternative Assessment</p> <p>ML requested for clarification on the alternatives, stating that GN R982 of 2014 was not considered as an alternative deposition site was not considered. ML further recommended that an alternative deposition location which has an already lined TSF be considered such as the DRD Mega Dump site.</p> <p>VM acknowledged the suggestion and indicated that it will be considered if it is feasible. VM indicated that it must be remembered that GN R982 of 2014, as amended, states that feasible and reasonable alternatives must be identified and considered. VM added that although there were other nearby TSFs previously considered by the applicant, there were disregarded for various environmental and engineering constraints, therefore, at the time of compilation of the Scoping Report, feasible and reasonable alternative TSF locations were not identified for the project. VM further directed ML to Section 5 of the Scoping Report which explains that the alternative feasible and reasonable TSF site is the Savuka TSF which is currently under a different application.</p> <p>BW acknowledged that the Scoping Report does not identify DRD Mega Dump site as an alternative location. BW indicated that this will be considered to assessment at the suitability of the suggested site. BW indicated that there might have been certain limitations with using that site and that may be the reason why it was not considered as an alternative location.</p> <p>HM stated said that although he is not certain, he believes the challenge with the DRD Mega Dump site was the rate of rise which made it not a viable option. HM indicated that the relevant information will be obtained and shared ML.</p>

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c.	<p>Comment / Concern / Question & Responses – <i>Lining of the TSF</i></p> <p>ML requested for clarification if the proposed TSF will be lined with the geomembrane barrier.</p> <p>VM responded that the applicant is currently consulting the Department of Water and Sanitation (DWS) regarding the lining requirements of the TSF. VM further explained that a pre-application meeting has taken place, however, the lining requirements will be determined once engineering designs and the geohydrological assessment are finalised and once the DWS officials has conducted a site visit.</p> <p>ML stated that she understands that current legislation requires TSFs to be lined but since they will be depositing in a historic unlined TSF, will there be retrofitting of a lining as required.</p> <p>BW highlighted that currently the engineers are looking at various options because they have identified potential risk of deferential settlement due to existing materials that form the base of the Mponeng TSF. Alternatives need to be studied in terms of the safety and effectivity of the lining. The geohydrologist did also study the porosity of the local geology and found that the geology is not porous.</p> <p>HM also added that the applicant did indicate their preference to DWS in terms of installing a liner on top of an existing facility. There are environmental management measures in place to deal with the plume migration. However, DWS stated that a final decision will come after a site visit. HM emphasised that the main priority for Harmony is a stable TSF that is able to withstand the test of time.</p> <p>ML raised a concern about the emphasis on the TSF not needing a liner, because the Scoping Report identified significant seepage at the southeast corner of the starter wall. ML suggested that the applicant should undertake something similar to the Kareerand TSF where the expansion of the TSF was lined. ML also raised a serious concern at the fact that the site was allowed to deposit general waste because it now possibly contains compressible waste material which may lead to uneven settlement over time. She highlighted that there would need to be a dynamic compression of the two different waste materials whether or not the TSF is lined. Further she asked for confirmation on her belief that TSF are far too different to general waste.</p> <p>VM clarified that only a portion of the TSF was used as a general waste deposition site and that only 200 square metres of the TSF was converted to a general waste facility. Further, the site conversion was approved by Gauteng Department of Agriculture and Rural Development (GDARD). Additionally, it was stated in 2012 that the other portion of the TSF would be used as a holding dam. HM referred ML to Section 2.2 of the Scoping Report indicating that there would be a need for ground improvement measures that should be taken into account such as dynamic compaction. Lastly, since there will be a surrendering of the general waste license GDARD will put measures in place that will be a requirement to be implemented for them to successfully accept the withdrawal of the license.</p>
d.	<p>Comment / Concern / Question & Responses – <i>Savuka TSF Closure Objectives</i></p> <p>ML indicated that it seems that the Savuka TSF appears to have reached its deposition capacity, she needed clarity in what Harmony's closure objectives will be and what would be the predetermined agreed upon future land use for the TSF. She needed clarity on plans for rehabilitation for the TSF.</p>


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	<p>VM responded that the Savuka TSF is not part of this Application process but a separate process and thus comments / or concerns regarding Savuka TSF need to be directed to the correct application / team for consideration.</p> <p>ML objected to that notion that as part of NEMA regulations, cumulative impacts will also need to be addressed. ML considers the Savuka TSF is part of the consolidated impacts of this new application and should therefore be part of the application. She requested closure plans as well as rehabilitation objectives for the Savuka TSF.</p> <p>HM responded that the Savuka TSF had not actually reached its LoM, it is only close to reaching the approved height if deposition and therefore an application for height extension was submitted and is on day 11 of 90 of the approval process. This additional application will allow them to continue depositing for a projected 2 more years. In terms of rehabilitation, all the side slopes are currently being vegetated and dust monitoring shows that it is effective. They are also constantly conducting water monitoring.</p> <p>ML added that in terms of the draft national mine closure strategy which will hopefully be put into effect soon, revegetation is not a rehabilitation strategy. Revegetation only acts as a stabiliser; however, a rehabilitation strategy needs to align with the principles of sustainable development, has to be agreed upon by I&APs, and also has to offer livelihood opportunities. ML added that there is importance of looking into diversification of economic activities and economic succession after closure.</p>
e.	<p>Comment / Concern / Question & Responses – <i>Spring Diversion</i></p> <p>ML requested for clarification on the river where the Spring is planned to be diverted to.</p> <p>BW indicated that the spring started daylighting only a few years ago and the water that comes out of the spring stays within the footprint of the lower compartment in a natural state. The engineers indicated that they currently are diverting that spring out into the channel around the TSF into the Aquatic Dam south of the Mponeng TSF. BW highlighted that the proposed plan is to stop the spring daylighting there, intercept the water that is coming from upstream in the topography and divert the clean water around the TSF to the east and down into the Elandsfonteinspruit, so keeping it within the clean water system.</p> <p>HM added that the water will be diverted into the natural aquatic dam, which farmers rely on for their irrigation purposes. Diverting the water would mean that the farmers keep getting the water from the stream. It also assists with dilution factors should there be any incidents in terms of spillages from the return water.</p> <p>ML requested for clarification if the stream the applicant is planning to divert to is the one that contained the gooseneck. She also asked for clarity regarding where the spring emerged from.</p> <p>HM responded by indicating that the spring started daylighting in 2004 and that is when deposition halted. At the time there was no way to intercept the spring, or another cheaper alternative was available at the time.</p> <p>ML inquired if there is a wetland associated with the spring, and if in the mitigation measures there are measures in place for an offset.</p> <p>VM indicated that according to the specialist studies, the spring is not associated with any wetland in the area. Mitigation measures have been identified and will be included in the EMPr.</p>


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f.	<p>Comment / Concern / Question & Responses – Risk Classification</p> <p>ML asked that since they plan on expanding the Mponeng TSF in both volume and height. How they would classify risk in terms of catastrophic failure. She needed to know the historic classification and how it will now be classified.</p> <p>BW indicated that the relevant risk classification is still to be determined pending the engineering studies that are currently underway.</p> <p>ML indicated that she was aware that Harmony Gold Mining was planning on applying some of the Global Industry Standard on Tailings Management (GISTM) principles to the proposed project. She mentioned that two of those principles deal with the safety of a tailing storage facility because the aim is 0 harm to communities, 0 harm to the environment and 0 tolerance for human fatalities. She advised that it would be good practice to indicate the flow path in the unlikely event of a catastrophic failure.</p> <p>BW indicated that the applicant will consider the comment when they have more information during the EIA phase.</p>
g.	<p>Comment / Concern / Question & Responses – Pipelines and Risk Measures</p> <p>ML indicated that steel pipes with flanges are now at a higher risk of being illegally removed, which results in the spillage of hazardous waste material. She asked how the spillages will be contained and prevented from going into the environment.</p> <p>VM indicated that in areas where the pipelines will be in close proximity to the watercourse or crossing the watercourse, there will be contingencies in place to prevent and/or react to accidental spillages. VM highlighted that preliminary mitigation measures indicated in the Scoping Report specifies that those areas will have secondary containment, exact measures will be indicated in the EIA Report once the engineering studies are finalised. VM further indicated that the Environmental Management Programme (EMPr) will have a requirement in place that to prevent and address potential spillages. VM also indicated that the advantage of having above-ground pipelines is that the spillages are easier to notice and allow for quick intervention.</p>
h.	<p>Comment / Concern / Question & Responses – Return Water Dam</p> <p>ML inquired if the Return Water Dam (RWD) was currently lined or not. She also enquired if a dew membrane barrier would be used to line the dam.</p> <p>VM responded by stating that the RWD is not currently lined, however, the plan is to merge the North and South Return Water Dams and that bigger RWD will then be lined. VM further clarified that it would be a class C barrier liner.</p>
i.	<p>Comment / Concern / Question & Responses – Catchment Management Forum</p> <p>ML highlighted that the Return Water Dam falls within the Mooi river and Loepspruit Catchment Management Forums. ML requested the team to present the project at the catchment forum.</p>

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	<p>VM highlighted the requirement for attending and presenting at Catchment Management Forums only becomes applicable once a holder receives a Water Use Authorisation. VM further added that there were no plans to attend the forums for this project unless invited to do so with reason.</p> <p>ML indicated that an invitation is only received once one has previously attended the forum. She further indicated that there are presentations done before EA, she added that they were mostly for Water Use Licenses (WULs). She recommended that the project team undertakes a presentation at the next catchment management forum meeting.</p> <p>HM indicated that his understanding is that the invitation for attending and presenting in Catchment Management Forums comes from the authorities once an application has been received.</p> <p>ML added that everyone at the catchment forum is a participant with equal influence. In addition, ML indicated that it could be used as an additional Public Participation Process (PPP) and that she could also suggest that the applicant be invited.</p> <p>VM acknowledge the request and assured Mariette that it would be taken into consideration should it align with the public participation process of the project.</p>
j.	<p>Comment / Concern– Water Quality Monitoring</p> <p>ML indicated that the sulphate and electrical conductivity are elevated in the application area. She requested that more attention be focused on water quality monitoring.</p>
k.	<p>Comment / Concern / Question & Responses – Radiation Assessments</p> <p>ML applauded that there will be a Health and Radioactive Impact Assessment conducted for the project. ML inquired if Harmony Gold Mining has a certificate of registration and what are currently the levels of radioactivity are and what the limits within the operation were.</p> <p>HM responded that the information was not readily available but will check with the radiation specialist and revert back.</p> <p>ML added that their main concern was the chemical toxicity of Uranium, the current legislation does not allow more than Micrograms per litre uranium.</p>
l.	<p>Comment / Concern / Question & Responses – Dust Management Plan</p> <p>ML inquired if the applicant had a Dust Management Plan because the new regulation requires it. Further, ML explained the requirements that come with a Dust Management Plan as opposed to the dust monitoring plan.</p> <p>HM highlighted that the mine currently has a Dust Management Plan and implements it.</p>
m.	<p>Closing</p> <p>VM acknowledges the comments received indicated that they will be responded to formally and added to the FSR and EIA Reports.</p> <p>ML highlighted that her comments and insights can be made available to the public.</p>

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	The discussion was concluded, and the meeting was adjourned.