



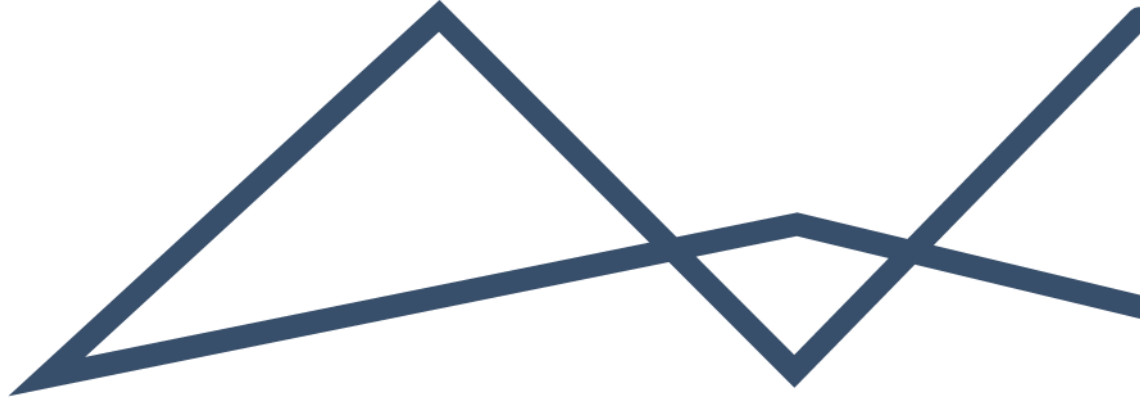
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PUBLIC PARTICIPATION REPORT

THUNGELA OPERATIONS (PTY) LTD COAL BED METHANE
PRODUCTION PROJECT





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ABBREVIATION LIST:

ARC:	Agricultural Research Council
BEC:	Bathusi Environmental Consulting
CER:	Centre for Environmental Rights
CoGTA:	Department of Cooperative governance and Traditional Affairs
CRLR:	Commission on Restitution of Land Rights
DALRRD:	Department of Agriculture Land Reform and Rural Development
DFFE:	Department of Forestry, Fisheries, and the Environment
DMPR:	Department of Mineral and Petroleum Resources
DWS:	Department of Water and Sanitation
EA:	Environmental Authorisation
EAP:	Environmental Assessment Practitioner
EIA:	Environmental Impact Assessment
EIMS:	Environmental Impact Management Services
EWT:	Endangered Wildlife Trust
FSE:	Federation for a Sustainable Environment
I&APs:	Interested and Affected Parties
LCJM:	Lephalale Community Justice Movement
LDF:	Lephalale Development Forum
LEDET:	Limpopo Economic Development, Environment and Tourism
LTA:	Limpopo Tourism Agency
MACUA:	Mining Affected Communities United in Action
NEMA:	National Environmental Management Act
NERSA:	National Energy Regulators of South Africa
NUMSA:	National Union of Metalworkers of South Africa
PPP:	Public Participation Process
SACAA:	South African Civil Aviation Authority
SAHRA:	South African Heritage Resources Agency
SANBI:	South African National Biodiversity Institute
SANRAL:	South African National Roads Agency
SR:	Scoping Report



WEJF: Waterberg Environmental Justice Forum
WESSA: Wetlands and Environmental Society South Africa
WWAO: Waterberg Women Advocacy Organisation



1 INTRODUCTION

Thungela Operations Proprietary Limited, a member of the Thungela Resources Limited Group (hereafter referred to as the Applicant) has appointed Environmental Impact Management Services (Pty) Ltd (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the required authorisation processes (including the statutory public participation), and to compile and submit the required documentation in support of application for:

- Environmental Authorisation (EA) in accordance with the NEMA- Listing Notice (LN) activities:
 - Listing Notice 2 Activities: 20 and 20A.
- Atmospheric Emissions Licence in accordance with the requirements of the National Environmental Management: Air Quality Act- NEM:AQA (Act 39 of 2004)- Scheduled Activity:
 - Sub-category 1.4 (Storage and Handling of Petroleum Products).
- Waste Management Licence in accordance with the requirements of the National Environmental Management: Waste Act- NEM:WA (Act 59 of 2008) - Listed activities:
 - A1; A6; A7; A12; A14; B1; B10; B11; C1 and C2.
- Water Use Licence (WUL) in accordance with the National Water Act – NWA (Act 36 of 1998) - Listed activities:
 - Section 21 water uses: 21a; 21b; 21c; 21e; 21f; 21g; 21i; and 21j.

The Applicant has submitted a Production Right (PR) application to the Petroleum Agency SA (PASA) for Coal Bed Methane (CBM) in the Lephalale Local Municipality, Limpopo Province, South Africa, which was subsequently accepted. Exploration activities which were undertaken in accordance with an Exploration Right (ER) have indicated a potentially viable and extractable CBM resource. The Applicant consequently has applied to the PASA for a PR to extract and produce (utilize) the CBM resource.

The Applicant aims to extract the CBM resource from the PR area in a phased manner. At present a total of 3 production phases are expected to reach the conceptual full field production which spans a total surface area of approximately 134 155 hectares (ha). The first production phase comprises of 333 production wells which will be connected via a buried gas gathering network of pipelines to a centralised gas processing facility. This application only covers the first production phase and additional permitting or licencing will be required at a later stage for the remaining phases of the wellfield development should these be pursued.

To optimally produce gas, hydraulic stimulation (fracturing) of the target coal seams is being proposed. The gas processing includes a compression and liquefaction facility to allow for the production of the final product, Liquefied Natural Gas (LNG), which will be distributed off site via road transport. The production is planned to span a period of 30 years commencing from the date that all relevant approvals and licences have been obtained.

The full PR application area encompasses 224 farm portions and a total area of approximately 134 155 ha. The gas production infrastructure of the first phase will comprise a smaller area within the broader PR area and will be the subject of this EIA. In addition to the overall PR application, this EA application area encompasses infrastructure within 20 farms and covers an area of approximately ~20 443 ha. The PR and the EA application area falls within the Lephalale Local Municipality and Waterberg District Municipality, Limpopo Province. The EA Application area is situated approximately 14km to the northwest of Lephalale town, 5km north of Marapong, and approximately 11km north west of Onverwacht.

2 OBJECTIVES OF THE PUBLIC PARTICIPATION

South Africa, being one of the countries with the most progressive constitutions, enshrined the public's right to be involved in decisions that may affect them in its Constitution. Section 57(1) of the new Constitution that provides: *"The National Assembly may (b) make rules and orders concerning its business, with due regard to*



representative and participatory democracy, accountability, transparency and public involvement". This provision, along with several others gave rise to many new trends in South African legislation. In environmental legislation, the idea of public participation (or stakeholder engagement) features strongly and especially the National Environmental Management Act (Act 107 of 1998, NEMA) and the recent regulations passed under the auspices of this Act makes very strict provisions for public participation in environmental decision-making.

Public participation can be defined as...*"a process leading to a joint effort by stakeholders, technical specialists, the authorities and the proponent who work together to produce better decisions than if they had acted independently"*¹. From this definition, it can be seen that the input of the public is regarded as very important indeed.

The Public Participation Process (PPP) is designed to provide sufficient and accessible information to Interested and Affected Parties (I&APs) in an objective manner to assist them to:

During the Environmental Authorisation:

- Verify that their issues have been recorded;
- Comment on the findings of the environmental assessments; and
- Provide relevant local information and knowledge to the environmental assessment.

The PPP is a requirement of several pieces of South African Legislation and aims to ensure that all relevant I&APs are consulted, involved and their opinions are taken into account and a record included in the reports submitted to Authorities. The process ensures that all stakeholders are provided this opportunity as part of a transparent process which allows for a robust and comprehensive environmental study. The PPP for the necessary authorisation required for the project needs to be managed sensitively and according to best practises in order to ensure and promote:

- Compliance with international best practice options;
- Compliance with national legislation;
- Establishment and management of relationships with key stakeholder groups; and
- Encouragement of involvement and participation in the environmental study and authorisation/approval process.

As such, the purpose of the PPP and stakeholder engagement process is to:

- Introduce the proposed project and process for the authorisation project;
- Explain the environmental authorisation;
- Determine and record issues, concerns, suggestions, and objections to the project;
- Provide opportunity for input and gathering of local knowledge;
- Establish and formalise lines of communication between the I&APs and the project team;
- Identify all significant issues for the project; and
- Identify possible mitigation measures or environmental management plans to minimise and/or prevent negative environmental impacts and maximise and/or promote positive environmental impacts associated with the project.

This Public Participation Report (PPR) lists all verbal and written comments raised by I&APs during the call to register period from the 16th of March 2026 to date. A breakdown of the PPP is given within the remaining sections of this PPR.



3 LEGAL COMPLIANCE

The PPP must comply with all environmental legislation that requires public participation as part of an application for authorisation or approval; namely, the National Environmental Management Act (NEMA, Act No. 107 of 1998).

Adherence to the requirements of the above-mentioned Act will allow for an Integrated PPP to be conducted, and in so doing, satisfy the requirements for public participation referenced in the Act. The details of the Integrated PPP are provided below.

4 IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES (I&APS)

An initial I&AP database has been compiled from historic projects in the area, and Windeed searches were conducted to obtain the contact details of affected and adjacent landowners. The I&APs referred to in the PPR include:

- Pre-identified and registered landowners and surrounding landowners;
- Pre-identified and registered key stakeholders;
- Regulatory authorities;
- Specialist interest groups; and
- All I&APs who responded to the initial notifications and requested to be registered.

Efforts to pre-identify key I&APs involved various avenues such as consultation with the proponent and known landowners within the study area, review of related previously conducted studies, and identification of key interest groups and authorities within the vicinity of the study area and municipality. Refer to **APPENDIX 1** for the Key Stakeholder/I&AP Database.

4.1 LIST OF ORGANS OF STATE IDENTIFIED AND NOTIFIED

The following key I&APs, but not limited to, were notified of the proposed project and invited to participate in the public participation process:

- | | |
|--|---|
| • Agricultural Research Council (ARC) | • Limpopo Economic Development, Environment and Tourism (LEDET) |
| • Botswana National Authority | • Limpopo Tourism Agency (LTA) |
| • Commission on Restitution of Land Rights (CRLR) | • National Department of Agriculture Land Reform and Rural Development (DALRRD) |
| • Council of Geosciences | • National Department of Forestry, Fisheries and the Environment (DFFE) |
| • Eskom Soc | • National Department of Mineral and Petroleum Resources (DMPR) |
| • Lephalale Local Municipality | • National Department of Public Enterprises |
| • Limpopo Department of Agriculture and Rural Development | • National Department of Transport |
| • Limpopo Department of Cooperative governance and Traditional Affairs (CoGTA) | • National Department of Water and Sanitation (DWS) |
| • Limpopo Department of Sport, Arts and Culture | • National Energy Regulator of South Africa (NERSA) |



- National House of Traditional Leaders
- South African Civil Aviation Authority (SACAA)
- South African Heritage Resources Agency (SAHRA)
- South African National Biodiversity Institute (SANBI)
- South African National Roads Agency Ltd (SANRAL)
- Transnet Properties
- Waterberg District Municipality
- Waterberg Environmental Justice Forum (WEJF)

4.2 LIST OF OTHER KEY I&APS IDENTIFIED AND NOTIFIED

- Pre-identified and registered landowners and surrounding landowners.
- Afri Forum
- Agri Lephalale
- Bathusi Environmental Consulting cc (BEC)
- Bertie Joubert Properties
- Centre for Environmental Rights
- Derek Light Attorneys
- Earthlife Africa
- EarthLife Johannesburg
- Electric Systems Development Company (Pty) Ltd
- Endangered Wildlife Trust
- Exxaro
- Fahad Game Reserve
- FrackFreeSA
- Greenpeace Africa
- Groundwork South Africa
- Hoerskool Ellisras
- Khongoni Mining
- Kigoda Consulting
- Laerskool Ellisras
- Lephalale Community Justice Movement (LCJM)
- Lephalale Development Forum (LDF)
- Mogol Irrigation Board
- Ngiyakuzwela Trading and Projects Pty Ltd
- Rise'n'Shine
- Seleka Traditional Authority/Seleka Royal Council
- Sportmans Safaris
- Transvaal Landbou Unie
- Waterberg Women Advocacy Organisation (WWAO)



5 NOTIFICATION OF INTERESTED AND AFFECTED PARTIES

This section provides details on the notifications that were distributed as part of the consultation process to date.

5.1 INITIAL NOTIFICATION OF KEY I&APS

The PPP commenced on the 16th of March 2026 with an initial call to register notification. Notification during this initial consultation was given in the manner described below.

5.1.1 FAXES, REGISTERED MAIL AND EMAILS

Notification letters (in English, Afrikaans, Sepedi, and Setswana) were distributed to pre-identified I&APS through either faxes, SMSs, registered mail, and/or emails on the 20th of March 2026.

The notification documents included the following information:

- Authorisations required;
- Sufficient detail of the proposed development to enable I&APs to assess/surmise what impact the development will have on them or the use of their land;
- The purpose of the proposed project;
- Details of the application processes associated with proposed activities;
- Details of the affected properties;
- Details of the South African environmental legislation that must be adhered to; and
- Relevant EIMS contact person for the project.

Please refer to **APPENDIX 2** for initial notification and proofs.

5.1.2 NEWSPAPER AND GAZETTE ADVERTISEMENTS

Advertisements were placed (in English and Afrikaans) in the Mogol Post Newspaper, and (in Sepedi and Setswana) in the Lekae Newspaper describing the proposed project and Environmental Impact Assessment (EIA), process with circulation in the vicinity of the study area on the 20th of March 2026 and the 1st of April 2026 respectively. The Gazette Notice was placed in the National Gazette on the 27th of March 2026. The newspaper and Gazette Notice adverts included the following information:

- Project name;
- Applicant name;
- Project location;
- Nature of the activity;
- Legislative requirements; and
- Relevant EIMS contact person for the project.

Please refer to **APPENDIX 3** for proof of the advert and gazette notice placed.

5.1.3 SITE NOTICE PLACEMENT

Sixty (60) A1 Correx site notices (in English, Afrikaans, Sepedi, and Setswana) were placed at 30 locations around the proposed project study area from the 16th to the 18th of March 2026. The on-site notices included the following information:

- Project name;
- Applicant name;



- Project location;
- Map of proposed project area;
- Project description;
- Legislative requirements; and
- Relevant EIMS contact person for the project.

Please refer to **APPENDIX 4** for proof of site notice and site notice distribution.

5.1.4 RADIO ADVERTISEMENTS

An initial round of Radio advertisements was broadcast between 6 – 12 November 2023. The advertisements described the proposed project, Scoping and EIA process urging I&APs to register to receive notifications regarding opportunities to participate in the EA process.

The radio advertisements and content thereof is presented in Table 1 below.

Table 1: Radio Advertisements Details

Radio Station	Languages	Publication Date
Waterberg Stereo	English and Afrikaans	18 – 20 March 2026
<p>Content of broadcast: <i>Thungela Operations Proprietary Limited are hereby notifying interested and affected parties that they have applied to the Petroleum Agency of South Africa for a Production Right, and their application was subsequently accepted, to extract and produce Coal Bed Methane in the Lephalale Local Municipal area, in the Limpopo Province. Thungela Operations Proprietary Limited aims to extract the Coal Bed Methane resource from the Production Right area in a phased manner. A total of three phases are expected to reach the conceptual full field production. The phases are spread over a prolonged period of time and therefore this notice intends to cover only the first production phase. Environmental Impact Management Services or E.I.M.S has been appointed as the Environmental Assessment Practitioner to undertake the required environmental authorisation processes including the statutory public participation, and to compile and submit the required documentation.</i></p> <p><i>Potentially interested or affected parties are invited to register and comment on the proposed project. In order to ensure that you are identified and registered as an Interested and Affected Party and that your comments are captured, please submit your name, contact details, the reason for your interest or any comments to E.I.M.S. They can be contacted telephonically at (011) 789 7170 or via email at LCBM@eims.co.za. Only registered I&AP's will be directly informed of future project information and opportunities for participation. Please visit the E.I.M.S website at www.eims.co.za for further information.</i></p>		

5.2 NOTIFICATION OF INTERESTED AND AFFECTED PARTIES OF SCOPING REPORT AVAILABILITY

Notification (in English, Afrikaans, Sepedi, and Setswana) regarding the availability of the Scoping Report for public review and comment will be provided to pre-identified and registered I&APs. The notifications will be distributed through either email, registered mail, fax, and/or SMS, where contact details are available.

6 SUMMARY OF PUBLIC PARTICIPATION OPPORTUNITIES

The table below provides a summary of the opportunities provided to I&APs for participation in the public participation process to date.



Table 2: Summary of Public Participation Opportunities

Action	Description	Publication/Place	Date
Initial Call to Register	Notification of landowners, occupiers, and other key I&APs.	Affected landowners and key I&APs were notified via email, fax, SMSs and/or post.	20 March 2026
	Placement of site notices.	Sixty (60) A1 Correx site notices (in English, Afrikaans, Sepedi, and Setswana) were placed at 30 locations along the proposed project study area.	16 – 18 March 2026
	Newspaper advertisement and Gazette Notice.	Advertisements were placed (in English and Afrikaans) in the Mogol Post Newspaper and (in Sepedi and Setswana) in the Lekae Newspaper describing the proposed project and EIA process Newspaper. The Gazette Notice was placed in the National Government Gazette	20 March & 01 April 2026 (Newspapers) and 27 March 2026 (Gazette Notice)
	Radio Advertisement	Radio advert in English and Afrikaans (Two slots per day)	18 – 20 March 2026 (10:30 and 14:45)
Availability of Scoping Report for public review	Placement of hard copy Scoping Report.	One (1) hard copy of the report will be placed where members of the public could access the report.	TBA



Action	Description	Publication/Place	Date
	Placement of Scoping Report electronic copy.	An electronic copy of the report will be placed on the EIMS website. A data free service will be made available to anyone who has limitations with respect to data downloads.	TBA

7 RECORD OF ISSUES RAISED

Comments on the proposed project were solicited from pre-identified and registered I&APs and key stakeholders. To date, the following comments have been received:

- I&AP registration
- Request for information relating to the background of the project.
- Request for details (and associated stakeholder engagement forms) on how to register as an I&AP.
- Request for information on affected properties, both in PR area and EIA area.
- Query on how the project will affect other economic activities in the area.
- Objections raised by mining right holders in the project application area.

All comments and/or queries received to date are included in this report and presented in **APPENDIX 5**. Please refer to **APPENDIX 6** for proof of correspondence.

8 CONCLUSION

The comments received during the initial call to register period were used to inform the compilation of this PPR.



9 APPENDICES

APPENDIX 1: IAP DATABASE

Please note that in an effort to protect the personal information of the Registered I&AP's the contact information of the I&APs will not be made publicly available. Should you require access to this document for the purposes of fulfilling your obligations under the NEMA EIA Regulations or other lawful right, please feel free to contact the EIMS Information officer at 011 789 7170 or popia@eims.co.za



APPENDIX 2: INITIAL NOTIFICATION PROOF

Please note that in an effort to protect the personal information of the Registered I&AP's the contact information of the I&APs will not be made publicly available. Should you require access to this document for the purposes of fulfilling your obligations under the NEMA EIA Regulations or other lawful right, please feel free to contact the EIMS Information officer at 011 789 7170 or popia@eims.co.za



APPENDIX 3: NEWSPAPER AND GAZETTE NOTICE PROOF



APPENDIX 4: SITE NOTICE PROOF



APPENDIX 5: TABLE OF CORRESPONDENCE



APPENDIX 6: CORRESPONDENCE DOCUMENT

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