

**MACUA& WAMUA - ADVICE OFFICE**

Ground Floor, 62 Juta Street  
Braamfontein  
2000  
Johannesburg  
Telephone: 067 720 1594  
Website: [www.macua.org.za](http://www.macua.org.za)



SOCIAL AUDIT REPORT  
ATOK  
BOKONI PLATINUM MINE  
2022

---

## Table of Contents

BACKGROUND	3
Bokoni Platinum Mine in Atok	3
Demographics	5
WHAT IS A SOCIAL AUDIT?	5
WHAT IS A SOCIAL AND LABOUR PLAN?	8
WOMAN IN MINING AFFECTED COMMUNITIES	10
METHODOLOGY	11
WHAT BOKONI MINE COMMITTED TO UNDERTAKE DURING THE SLP YEARS AUDITED (2013-2018):	13
EDUCATION	13
Bursaries (Community)	13
Internships	13
LOCAL AND ECONOMIC DEVELOPMENT PROJECTS	13
Construction of Access Roads	14
Monametse Skills Development	14
SMME Development	14
Mokgotho Creche	15
Mositsi Water Project	15
Mahudu Primary School	15
Shole Creche	15
Support to People Suffering from Disability	15
Sefateng Bulk Water Project	16
RESULTS AND DISCUSSION	17
CONSULTATION	17
BURSARIES & INTERNSHIPS	18
ACCESS ROAD	19
MONAMETSI SKILLS DEVELOPMENT CENTRE	19
SMALL, MEDIUM, AND MICRO ENTERPRISE (SMME) DEVELOPMENT	20
SUPPORT TO PEOPLE SUFFERING WITH DISABILITY	20
REPORTING BY BOKONI PLATINUM MINE	21
CONCLUSION	22
APPENDICES:	23
Appendix A: Overall Results and Observations	23

## **BACKGROUND**

Atok is located in the Fetakgomo Tubatse Local Municipality (FTLM) in the Sekhukhune District of Limpopo, previously known as Fetakgomo Local Municipality. Sekhukhune is a mountainous region containing several rivers and valleys.<sup>1</sup> The district is rich in natural deposits of precious metals, containing one of the largest reserves of platinum group metals in the world.<sup>2</sup> The region is globally recognized for its rich biodiversity, with over 2 200 indigenous species of vascular plants present in the region. The region also has a rich history which dates to the 16<sup>th</sup> century.<sup>3</sup> However, mining activity has led to a large amount of land being lost by local populations, and their air and water being polluted.

The Local Municipality is characterised by economically depressed areas, consequently having difficulty attracting and retaining skilled managers/professions.<sup>4</sup> The region also struggles to generate revenue. Mining activity is therefore welcomed in the region. Atok Nodal Point Villages has a history of mining which stretches back to the 1960s. Before the arrival of mines, most villages relied on farming (crop and livestock) as means of survival. Villages were dependent on river water which used to flow as far as 20km until underground mining started, leading to the reduction of the river flow and polluted water.

### **Bokoni Platinum Mine in Atok**

The Bokoni Platinum Mine is in the Atok area (see figures 1 and 2 below). The large open pit mine contains one of the largest platinum reserves in South Africa, with an estimated 2 350 tonnes of platinum.<sup>5</sup> The mine has struggled to operate due to difficult mining conditions causing high operating costs. The mine is currently owned by African Rainbow Minerals (ARM) (49%), who

---

<sup>1</sup> Department of Cooperative Governance and Traditional Affairs, "Profile and analysis: District Development Model", 2020, accessed 25 January 2022, [https://www.cogta.gov.za/ddm/wp-content/uploads/2020/07/Take4\\_2020.06.25-SEKHUKHUNE-District- Profiles-Final-Version-.pdf](https://www.cogta.gov.za/ddm/wp-content/uploads/2020/07/Take4_2020.06.25-SEKHUKHUNE-District- Profiles-Final-Version-.pdf)

<sup>2</sup> "Welcome", *Sekhukhune District Municipality*, accessed 10 February 2021, <http://www.sekhukhunedistrict.gov.za/?q=node/204>

<sup>3</sup> Fetakgomo Tubatse Local Municipality, accessed on 08 February 2022, <http://www.fgtm.gov.za/>

<sup>4</sup> Ibid.

<sup>5</sup> Anglo American, "Mine Profile: Mogalakwena", 2022, accessed 08 February 2022, <https://www.angloamerican.com/about-us/our-stories/mine-profile-mogalakwena>.

recently bought their share of the mine from Anglo American, Atlatza Resources Corporation (51%) in 2021.<sup>6</sup> Bokoni Mine has been on care and maintenance since 2017.<sup>7</sup>

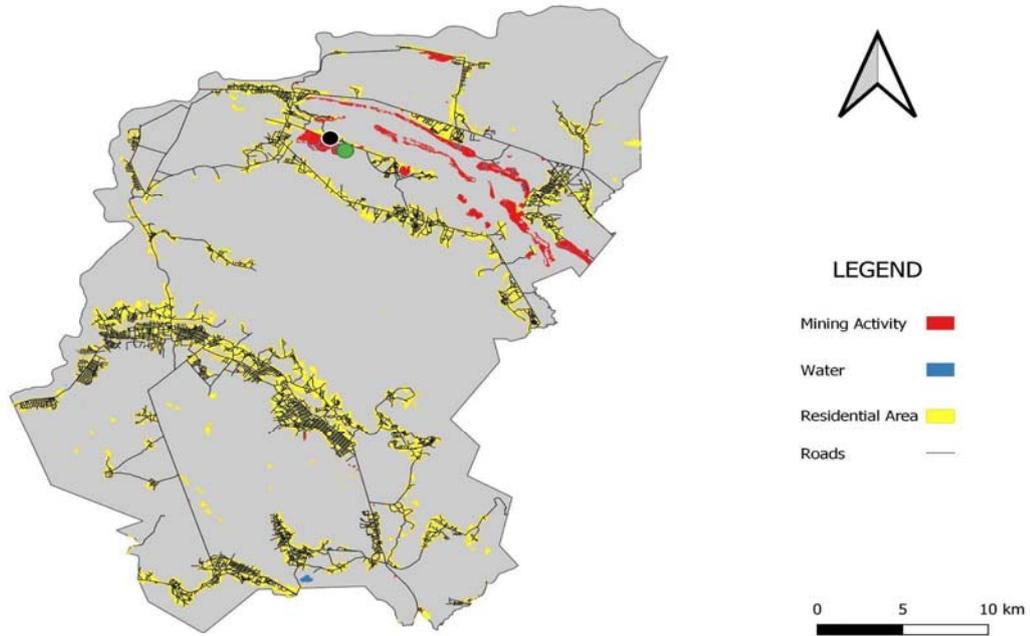


Figure 1: Map of Atok

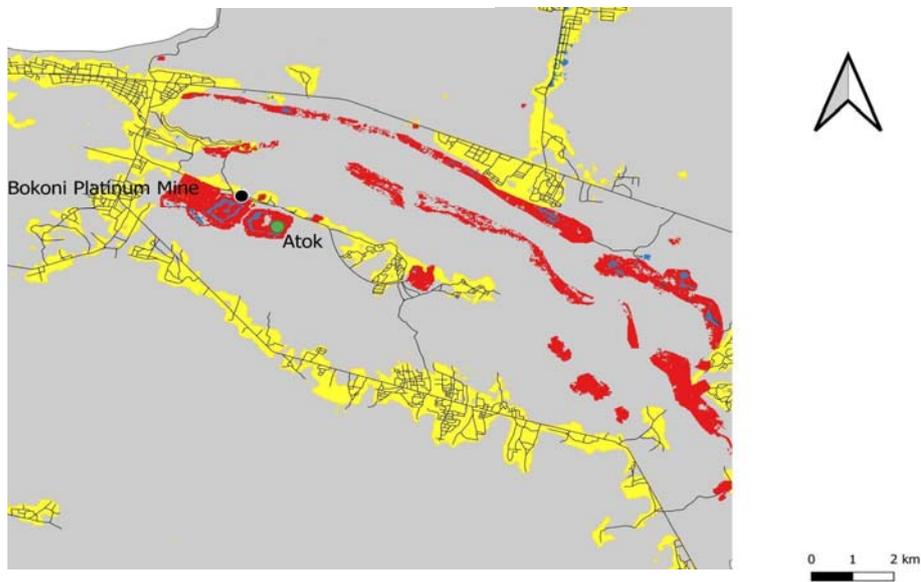


Figure 2: Map of Atok in relation to Bokoni Platinum Mine

<sup>6</sup> Brendan Ryan, "ARM buys the Bokoni Platinum Mine for R3.5bn and plans a radical transformation," *MiningM<sup>x</sup>*, December 20, 2015, <https://www.miningmx.com/news/platinum/48419-arm-buys-the-bokoni-platinum-mine-for-r3-5bn-and-plans-a-radical-transformation/>

<sup>7</sup> <https://www.angloamericanplatinum.com/media/press-releases/2021/20-12-2021>, accessed on 08 February 2022.

## **Demographics**

According to Statistics South Africa, 99.4% of the 93 795 people in the FTLM are black African.<sup>8</sup> The remaining 0.6% is made up of the other population groups. 54.9% of the population is female and 45.1% is male.<sup>9</sup> The education level of the region is generally poor, with 44.6% of the population having obtained some primary education, 5.8% completed primary education, 38.1% having some secondary education, 8.6% completed secondary education, 0.7% having participated in higher education and 2.1% having no schooling.<sup>10</sup> Access to water remains an obstacle for many residents in the FTLM with 33.1% of households having access to piped water on a community stand within 200m from their dwelling, 30.2% having piped water in their yard, 5.5% with access to piped water inside their dwelling, and 11.5% of households having no access to piped water.<sup>11</sup> The economic state of the FTLM is weak and poverty levels are high. There is only one shopping centre in the municipality in addition to the mining activity in the Atok region available to stimulate the municipality's economy.<sup>12</sup> Youth unemployment is a major problem in the FTLM, with 70.5% of youth in the region being unemployed.<sup>13</sup>

## **WHAT IS A SOCIAL AUDIT?**

A social audit is a community-led process whereby the cogency of the promises made by the mining companies affecting communities are put to the test. Social audits build community power, deepening the culture of participatory democracy and public deliberations by enabling communities to gather and legitimise evidence of their experiences of service delivery, and through this process enables them to claim and realise their constitutional rights to a transparent and accountable mining company. During a social audit the expenditure and service delivery outcomes promised in the Social and Labour Plan (SLP) of a mine are tested to see whether community experiences of those outcomes reflect the vision of implementation as stated in the SLP.

The SLP contains proposed programmes that should be directed at the host mining-affected communities and labour sending areas, to offset the negative impacts of mining and improve the

---

<sup>8</sup> Statistics South Africa, "Fetakgomo", 2011, accessed 12 February 2022, [http://www.statssa.gov.za/?page\\_id=993&id=fetakgomo-municipality](http://www.statssa.gov.za/?page_id=993&id=fetakgomo-municipality).

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

quality of life for both the mine employees and the mining-affected communities. Members of the community collectively participate in the process of verifying the SLP of a particular mine by comparing the stated outcomes with the lived experiences and realities of people on the ground. Evidence collected during the social audit is then reported to the responsible stakeholders at a public meeting and used as a vehicle for advocacy by the host community.

Community testimony, knowledge, and experiences are a legitimate and central part of this evidence. A social audit provides a way to build effective and meaningful participation in poor and working-class communities by providing a means for communities to engage with the mine process that affects their lives. They provide an opportunity for poor mining communities to be heard, and space for people who have been excluded, deceived and cheated out of their benefits to interrogate the cogency of the mine's promises to the community.

Mining companies are significant social players who account for a large portion of the South African economy. This power and financial muscle often allows mining companies the capacity to evade social responsibility using PR consultants and campaigns to produce glossy reports regarding their social commitments to the communities at which they operate. Their Corporate Social Investment (CSI) strategies are often synchronised with the Social Labour Plan (SLP) commitments, which may paint a good picture on paper, however, contradict the realities on the ground. SLPs are legally binding on companies to implement, unlike CSI projects, and communities are empowered by the Mineral and Petroleum Resources Development Act<sup>14</sup> (MPRDA) to require these commitments from the mining companies. The best methodology to interrogate the claims of mine companies is to conduct community-led social audits and collect evidence to verify the realities on the ground to potentially challenge the glossy PR reports.

The aim of this social audit was to establish whether there has been any tangible and sustainable development provided by Bokoni Platinum Mine between the years of 2013 and 2018. SLP's are renewed every 5 years and by doing a Social Audit the community is better able to:

1. Assess the extent of compliance with the SLP within the community of Atok.
2. Assess whether Bokoni Platinum Mine's SLP obligations are effective, efficient and provide sustainable goals to the community of Atok.
3. Determine if appropriate measures exist that:

---

<sup>14</sup> Act 28 of 2002.

- establish, monitor, and communicate the SLP process and procedures with the community,
- ensure reliable information is available for all stakeholders involved including the Atok Community,
- and establish and communicate roles and responsibilities for all parties involved.

## WHAT IS A SOCIAL AND LABOUR PLAN?

A Social and Labour Plan (SLP) is a document that mining companies are required to submit to the Department of Mineral Resources and Energy (DMRE) as part of their application for mining rights. According to the MPRDA, mineral resources of the country are the common heritage of all who live in the country. Section 2 (d) of the MPRDA further states that its objectives are to ‘substantially and meaningfully expand opportunities for historically disadvantaged persons, including women, to enter the mineral and petroleum industries and to benefit from the exploration of the nation’s mineral and petroleum resources’.<sup>15</sup> This emphasises the role of mineral resource extraction and operations as a pivotal means towards community development and women empowerment. SLPs, therefore, are the means by which mineral and petroleum exploration can benefit communities.

According to section 23 (1) (e) of the MPRDA, (as amended by section 19b of Act 49 of 2008), the Minister must grant a mining right 'if the applicant has provided financially and otherwise for the prescribed social and labour plan. The MPRDA further place duties on mining right holders:

Section 25 (2) (f) - Duty of holder of the mining right to comply with SLP;

Section 25 (2) (h), read with Section 28 (2) (c) - Duty of mining right holder to report annually on compliance with SLP.

Part II of the Mineral and Petroleum Resources Development Regulations (Regulations) further provides for the regulations of SLPs. Section 41 (c) states that the objective of the SLP is to ‘ensure that holders of mining rights contribute towards development of the areas in which they are in operation’.<sup>16</sup> Further, section 46 (c) regulates the contents of the SLP and requires that they must include a Local Economic Development Programme (LED) comprising; (ii) the key economic activities of the area in which the mine operates and (iii) the infrastructure and poverty eradication projects that the mine would support in line with the Integrated Development Plan (IDP) of a local municipality and major sending areas.<sup>17</sup>

An SLP is a five-year plan, which needs to be completed and must be renewed by a mine with the DMRE after a five-year period. Once it is approved by the DMRE it becomes a legally binding

---

<sup>15</sup> *Mineral and Petroleum Resources Development Amendment Act 49 of 2008: Section 2.*

<sup>16</sup> *Mineral and Petroleum Resources Development Act 28 of 2002: Mineral and Petroleum Resources Development Regulations at s41 (c).*

<sup>17</sup> *Ibid at s46.*

document, containing commitments made by the company on what it will do for both communities and workers. It also stipulates how and when commitments will be executed, as well as what the budgets are for promised interventions or activities.<sup>18</sup> It is therefore, one of the instruments to address South Africa's long history of inequality in the mining sector. In principle, SLPs should be drafted with the consultation of the communities, however, that is not always the case. In terms of Regulation 45, a mining right holder must convene a minimum of three meetings per annum with mining affected communities, as well as interested and affected persons to update these stakeholders about the progress made with the implementation of the approved SLP and the outcome of these meetings must form part of the annual reports.<sup>19</sup>

Despite the comprehensive and progressive laws in place, the reality is that although the SLP system has been in force for over twelve years, most communities affected by mining still experience abject poverty and underdevelopment. This is partly because SLPs are often designed without adequate consultation with the communities that stand to benefit from the mining operations on their land. Furthermore, mining companies often neglect to deliver on all the SLP commitments, and the DMRE often does not follow up on these commitments or enforce them, to the detriment of mining-affected communities.

The purpose of the SLP, therefore, is to promote employment, advance social and economic welfare, contribute towards transforming the mining industry and ensure that mining companies contribute to the development of the areas where they operate.

---

<sup>18</sup> Ibid at s45.

<sup>19</sup> Ibid.

## WOMAN IN MINING AFFECTED COMMUNITIES

Women who are not formally employed are the backbone of the functioning of mining-affected communities.<sup>20</sup> The sustained employment of men and operation of the mine is indirectly dependent on women as they are heavily involved in social reproductive activities. Social reproductive activities refer to activities which enable their male counterparts to attend work in the mines. This includes activities such as house cleaning, cooking, maternal duties, et cetera. Although social reproduction is pivotal to the functioning of mining-affected communities (and, indirectly, the operation of mines), women are often excluded from decision-making processes as they are not formally employed by mining companies and there is a dominant belief that women are subservient to men in South African culture.

As such men in mining-affected communities become the primary beneficiaries of mining activities. This is a norm in rural South African communities, as patriarchal structures are a mainstay in South African culture. In mining-affected communities, men are heavily involved in the operation of the mine itself, which provides them with employment and income. As a result, women in mining-affected communities become dependent on their male counterparts due to the lack of employment opportunities available to them. This impedes women's ability to accrue wealth and status in mining-affected communities. In some communities, such as in mining-affected communities in the Limpopo region, women are able to derive their independence from men through agricultural activities.<sup>21</sup> Produce can be farmed and sold, with the surplus earned being used as an income for women. This may be difficult in regions where mining activity has caused a loss of land. Women in these regions may find it difficult to find alternative income and therefore, remain dependant on males who are employed by the mine, and may resort to sex work – a major economic activity taken up by women in mining-affected communities. Sex work exacerbates the spread of diseases such as Tuberculosis (TB) and HIV/AIDS which thrive in mining-affected communities. Women in sex work also are largely vulnerable to violence and exploitation by clients, and to social stigma due to the lack of regulation and the discreet nature of sex work.

---

<sup>20</sup> Asanda Benya, "The invisible hands: women in Marikana", *Review of African Political Economy* 42, no. 146 (2015) at 545-560.

<sup>21</sup> Mark Curtis, *Precious Metal: The Impact of Anglo Platinum on poor communities in Limpopo, South Africa* (South Africa: ActionAid, 2008).

## METHODOLOGY

The survey was conducted through a 24-item household questionnaire with closed and open-ended questions. Any member of the household who had stayed in the community for more than a year was eligible for interview. The assumption was that people who had been in the community for less time would not be well acquainted with the issues regarding the mine and the community.

The Social Audit team interviewed 207 people in Atok. People from the Maruping (57), Mokgotho (38), Monametsi (52), Mosotsi (5), Sefateng (13), and Shole (42) participated in the social audit (see Table below), comprising of 123 female and 84 male participants.

Community in in	Number participants
Maruping	57
Mokgotho	38
Monametsi	52
Mosotsi	5
Sefateng	13
Shole	42
<b>Total</b>	<b>207</b>

Community members were trained on SLP interpretation, social audit methodologies, and designing surveys. The questionnaire was designed in collaboration with a social audit team and trained community members. During the training, the community organisers had an opportunity to test the questionnaire and agree on ways to probe questions. The training, which was facilitated by ActionAid South Africa (AASA) and MACUA WAMUA Advice Office (MWAo), was also used to solicit the community views on what future inquiries would focus on. The training was conducted from 15 – 19 June 2018 and data collection occurred on 19 June 2018. Following the fieldwork, a de-briefing meeting was conducted where all data collectors discussed issues arising from the survey, challenges, and strategies for making future community inquiries more effective.

Data entry for completed surveys was conducted by MWAO for the analysis of the quantitative variables. Theme analysis and quantifying common responses was conducted for the qualitative variables.

The approach for this social audit included the following steps:

1. Holding a mass meeting and establishing a mandate
2. Preparing and organising the participants
3. Training participants
4. Analysing the Social Labour Plan
5. Developing and testing the social audits questionnaire
6. Gathering evidence
7. Capturing community experiences and testimonies
8. Agreeing on the main findings and organising evidence
9. Meeting with the mine
10. Reflecting and follow up

## **WHAT BOKONI MINE COMMITTED TO UNDERTAKE DURING THE SLP YEARS AUDITED (2013-2018):**

### EDUCATION

#### Bursaries (Community)

- The SLP provides for two types of bursaries
  - The first involves a bursary for 10 high school students to cover the costs of education including school fees, books and an annual stipend for costs of living
  - The SLP says that the mine has asked local high schools for a list of strongly performing learners (maths and science) in Grades 11 and 12 for interviews before deciding on who to award the bursary to. The schools mentioned are Potlake High School, Lefakgomu High School, Monare High School, Phuti Tlou High School, Moraswi High School and Serokolo High School.
  - The second part of the bursary involves supporting the same students in their university studies. It is stated that the mine will ‘in all likelihood’ choose to award bursaries to students who want to study Mining Engineering, metallurgy, geology, rock mechanics, finance and accountancy, electrical and mechanical engineering.

#### Internships

- The internship is meant to ensure that the same students get internships in the mine, It is stated that as of 2018, there should be 4 geology interns, 4 mining engineering interns, 1 accounting intern and 1 engineering (electrical or mechanical) intern.

### **LOCAL AND ECONOMIC DEVELOPMENT PROJECTS**

- The SLP states that there is a stakeholder forum set up consisting of villages around the mine such as Monametse, traditional authorities, the Bokoni Mine, Fetakgomo Local Municipality and local SMMEs. This Forum is meant to promote communication, address community concerns on social impacts of mining, identify community priorities for development projects (i.e., in the SLP) and promote implementation of the projects.
- The following two projects refer to Monametse village as beneficiaries.

### **Construction of Access Roads**

- Bokoni Mine committed to construct an access road or roads to Monametse village by 2017. For each of the five year the company would spend R100 000.00. Access roads would also be built for the villages of Maruping, Selepe, Manotwane, Malomanye, Sefateng and Mokgotho.

### **Monametse Skills Development**

- The SLP states that during 2014 the Bokoni Platinum Mine would provide a project that gives the community access to skills development, early childhood development, and care for the elderly. It is also stated that the project will assist members of the community with food production. R500 000.00 was budgeted for this project.
- The SLP does not state what kinds of skills will be offered, how one can apply, and where this takes place.

### **SMME Development**

- Unlike the other projects in the SLP, this project is not linked to a specific village but rather to the Local Municipality.
- The aim of this project was to provide training for local SMMEs, assist in setting up local business forums, assist in developing partnerships with potential funders, and to assist in partnerships with more established businesses in the area (such as assisting SMMEs to get in to supply chains of bigger businesses). The project has the modest aim of creating 3 jobs (1 male adult, 1 female adult, and 1 female youth).
- The project claims to operate from a local multi-purpose centre where community members will go to obtain help with their business ventures.
- This project was in partnership between Bokoni Mine, Anglo Zimele, and the Limpopo Support Agency.
- There was supposed to be monitoring of the impact, e.g. how many new SMMEs are added to the supply chain database each year.
- The project is said to start in 2013 and end in 2017, and the total budget over the five year cycle was R200 000.00.

### **Mokgotho Creche**

- The aim of this project was to upgrade infrastructure at a crèche in Mokgotho. It's a construction projects which involves the building of an 'office block'.
- The project was said to commence in 2013 and end in 2014 and the budget for this project was R1,013 million.

### **Mositsi Water Project**

- The aim of this project was the provision of a reservoir, water reticulation system and installation of standpipes.
- This project was supposed to have started in 2015 to be completed in the same year, and the budget was R1.3 million.

### **Mahudu Primary School**

- The aim of this project was to address the lack of adequate educational infrastructure at the school by constructing an administration block.
- Project was due to start in 2017 to be completed in the same year, and the budget for this project was R600 000.00.

### **Shole Creche**

- The community in this village identified the lack of adequate crèche facilities as a challenge, as a result the company committed to construct a crèche and an administrative block.
- The project would employ 7 people (2 male adults, 3 male youth, and 2 female youth).
- This project was due to start and end in 2015 and the budget allocated was R600 000.00.

### **Support to People Suffering from Disability**

- This project was targeted at the mine workers who were injured at the workplace. It is stated that a common workplace will be found for the disabled workers (SLP lists PPE repairs as an example).
- The SLP states that the centre will be in the village of Ga-Madiseng but neglects to state a budget for the implementation of the project.

### **Sefateng Bulk Water Project**

- A dam was constructed by the Department of Water Affairs in Sefateng Village, some years prior to the SLP, to address the water challenges communities were facing. However, the construction of the dam did not translate into communities receiving water from this dam. The company in their SLP committed to the installation of the reticulation pipes and of standpipes so communities could access this water.
- The SLP projects that 50 people will be provided with work through this project (15 male adults, 10 female adults, 5 male youth, 10 female youth).
- The project was due to start in 2014 and end in 2017, and the total budget allocated was R21 million.

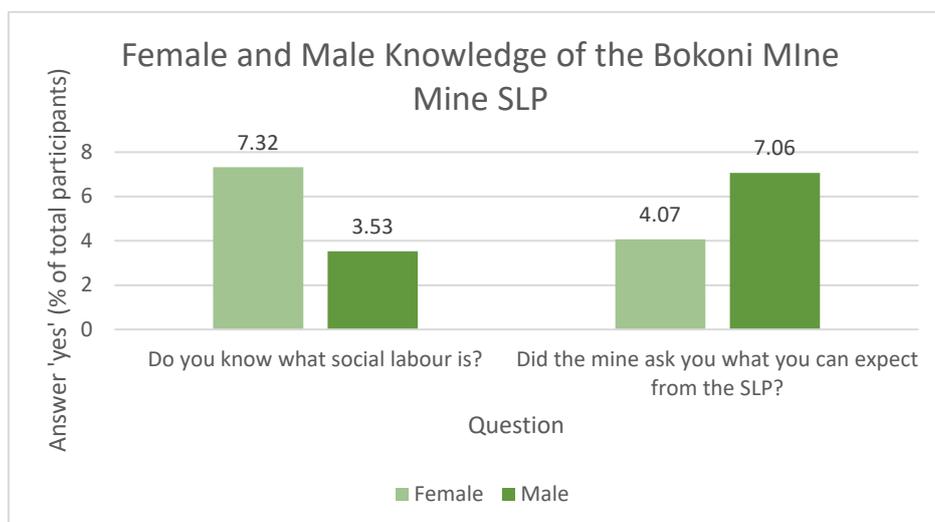
## RESULTS AND DISCUSSION

The results of the social audit were analysed in relation to the commitments made by the Bokoni Mine in their SLP. This includes an analysis of the community's knowledge and understanding of SLPs (including an analysis of male and female understanding); bursaries and internships; access roads; the Monametsi Skills Development Centre; Small, Medium and Micro Enterprise (SMME) development; and people suffering from disability. Not all of the projects committed by the mine were selected to be audited. See Appendix A for a breakdown of the results.

## CONSULTATION

Bokoni Mine is supposed to create an SLP in consultation with communities affected by its operations. When asked whether they know what a social and labour plan is, 94.3% of the respondents did not know and only 5.7% (11 out of 193 people interviewed) knew about a social and labour plan. This is a clear indication that Bokoni Mine fell short in making their SLP accessible to the affected communities and did not consult them in the process of its creation.

When asked if they had ever been consulted by the mine in the formulation of the SLP, only 10 (5.2%) of the respondents assented to having been consulted by the Bokoni Mine on a previous occasion, while 183 (94.8%) had not been consulted in the formulation of the SLP. However, upon taking a closer look, many of the respondents that were consulted by Bokoni Platinum Mine indicated that the consultation occurred prior to 1993. The obligation to create SLPs only came with the promulgation of the Minerals and Petroleum Resource Development Act (MPRDA) in 2002, and as such SLPs only became a part South African law in 2002. Only 3 people (30%) had



been consulted after 2002. Therefore, it can be said that the others were not consulted on the formulation of the SLP, but rather on other matters.

The Figure above illustrates a comparison between female and male participant understandings of SLPs and the Bokoni Platinum Mine SLP in the affected areas. The Figure indicates that, although very little, more female participants knew what an SLP is, even though more males were consulted with regards to the formulation of the Bokoni Platinum Mine SLP. 7.3% of female participants indicated that they know what an SLP is, in comparison to the 3.5% male participants. 4% of the female participants indicated that they were asked, on a previous occasion by the mine, about their expectations of the Bokoni Platinum Mine, in comparison to 7.06% of the male participants who were asked.

This  Figure 3: Gendered Representation of knowledge of SLPs

evidence indicates that more females than males in communities affected by the Bokoni Platinum Mine understand what an SLP is. However, more males have been consulted by the Bokoni Platinum Mine. The inability by the Bokoni Platinum Mine to include more females in the consultation process is counterintuitive as females have a better understanding of SLPs than males (based on this study). It would be advantageous and prudent for the mine to include more females in the consultation process. This would establish a more robust SLP as females would not only bring clearer expectations but would bring a better understanding of the impacts of mining activity on the community. This is due to most of their time being spent in their community participating in the care economy, enabling males to attend work (many of whom work in the mines).

### **BURSARIES & INTERNSHIPS**

Bokoni Mine committed to offer bursaries to 10 high school students who they would later sponsor throughout their university studies and offer learnerships to gain practical experience. Of the 193 people interviewed, 8 had a family member who was being sponsored by the Bokoni Platinum Mine to attend school between 2010 and 2016. Only one of the respondents knew someone who did not fall into the scope of this SLP 2013-2018. Although the respondents were not certain what the respondents studied, the relation to the individual that received the bursary from the mine is a sufficiently close link to consider the project implemented and verified.

According to 6 respondents (75%) after completion of their studies, the bursary students received practical training from the mine. One respondent asserted that the person who received the bursary was still engaged in their studies and then another respondent denied that the bursary student they knew of received practical training from the mine after the completion of their studies.

### **ACCESS ROAD**

Bokoni Mine in its 2013-2018 SLP committed to construct an access road or roads to Monametse village by 2017. For each year of the five year period the company would spend R100 000. Access roads would also be built for the villages of Maruping, Selepe, Manotwane, Malomanye, Sefateng and Mokgotho.

20 people (10.4%) knew of a road constructed by Bokoni Mine between the years 2013 and 2018, whereas 173 people (89.6%) did not. Nevertheless, when asked where this road was situated, different answers were given by the respondents. Most commonly Maruping, which was given by 8 of the respondents. As such it can be said that it is likely that an access road was built in Maruping, however not so likely in the other areas as fewer people could vouch for the integrity of such an assertion.

Furthermore, the respondents assert that the access roads built are 50/50 tar and gravel roads. The mine has claimed in their annual report that they have been maintaining the community access roads, however there is no proof that the roads were maintained at the committed value. Furthermore community members in Monametse assert that the mine would only re-gravel the access road to the village upon request by community members, which was not done on a yearly basis nor was the request fulfilled consistently.

### **MONAMETSI SKILLS DEVELOPMENT CENTRE**

Bokoni Mine committed to provide a project that gives the community access to skills development, early childhood development, and care for the elderly during 2014. It is also stated that the project will assist members of the community with food production.

Only 3.1% of people knew of a building in the community used for skills development, while 96.9% of respondents did not know of any such building. Of the 6, that knew of the skills development centre, 4 (66.7%) answered that the centre provides the community with 'mining skills', one (16.7%) answered 'learnership' and another (16.7%) did not know what was provided in the skills development centre.

Upon taking a closer look, of those 6 who had said they know of the skills development centre 50% said that there is no centre, and they were referring to knowledge of the commitment, while 2 (33.3%) noted that it was built in 2015 and 1 (16.7%) noted that it was built in 2013.

The Bokoni Mine submitted annual compliance reports to the Department of Mineral Resources (DMR) claiming to have completed the skills development centre in 2014 however at the time of the audits (2018) there was no skills development centre in Monametse. A complaint was accordingly lodged with DMR regarding the non-existence of the skills centre. After the complaint, a Skills Development Centre was eventually built by the Bokoni Platinum Mine, however the size of the building and the offerings present at the centre do not match up with the promises made in the SLP; which speaks to the inability of the regulator to ensure that projects undertaken by mining companies are realised in affected communities.

### **SMALL, MEDIUM, AND MICRO ENTERPRISE (SMME) DEVELOPMENT**

The Bokoni Platinum Mine committed to provide training for local SMMEs, assist in setting up local business forums, assist in developing partnerships with potential funders, and to assist in partnerships with more established businesses in the area (such as assisting SMMEs to get in to supply chains of bigger businesses). Only 2 people that were interviewed (1%) knew of businesses that had been assisted by the Bokoni Mine to develop between 2013 and 2018, while 99% of people did not know of any businesses. The one person came from Maruping and the other did not know where the person was from. The business assisted was an agricultural business. However, both people who knew of businesses that were assisted by Bokoni Mine noted that there was no business forum in their community.

### **SUPPORT TO PEOPLE SUFFERING WITH DISABILITY**

Bokoni Mine committed to find a common workplace for the disabled workers in the village of Ga-Madiseng.

49 (25.4%) of the respondents knew someone that had been injured at Bokoni Mine while working there, while 74.6% did not know people who were injured on the job. However only one person knew of the centre built to benefit people with disabilities. 19 (9.8%) declined to answer and 173 (89.6%) of the respondents responded that there was no centre built to benefit people with disabilities by the Bokoni Platinum Mine.

## REPORTING BY BOKONI PLATINUM MINE

Copies of annual compliance reports that are sent to DMRE on an annual basis were requested from Bokoni Mine and the DMR, to compare the social audit findings against the claims made in the reports. The Bokoni Mine only shared their annual compliance reports for 2014, an indication of a lack of transparency with the community about their expenditure and implementation of projects that were meant to benefit the community.

Nevertheless, in the annual compliance report for 2014, as of 31 December, Bokoni Mine reported to have spent R10.7 million on community projects. They do not specify which projects in the community or how the funds were allocated, which does not assist the DMR or the affected community members in being able to decipher to what extent commitments were fulfilled. The exercise and requirement to submit the annual compliance report is thus turned into a tick-box exercise for the mining company as well as the DMR rather than an evaluation of the level of compliance.

In another report by Atlatsa Resources Corporation, it was reported that the Monametse Village housing project was completed during 2014 by the Bokoni Mine, but also stated that in 2014 a total of R6.5 million on Social and Labour Plan initiatives in was spent.<sup>22</sup> There is an obvious and stark discrepancy in the way Bokoni Platinum Mine is reporting to the DMRE and to its stakeholders and the manner in which Atlatsa was reporting on the 2014 reporting period.

Atlatsa Resource Corporation had no further information of annual reports that could be accessed through their website. Further information in relation to the SLP period audited (2013-2018) could be gathered from the 2015 Anglo Platinum Annual Integrated Report.<sup>23</sup> This speaks to a deeply deliberate attack on communities affected by the operations of the Bokoni Platinum Mine's ability to access information and progress reports on the operational activities of the mine and the manner in which they are impacted.

In 2015 restructuring plans were set into motion at the mine, to stop loss-making production which led to approximately 1,079 employees and contractors exiting by 31 December 2015.<sup>24</sup>

---

<sup>22</sup> Atlatsa, "Investors and Media", 2019, accessed on 08 February 2022, <https://www.atlatsa.com/investors-and-media>.

<sup>23</sup> Anglo American Platinum Limited, "Integrated Report 2015", 2016, accessed on 08 February 2022, [https://www.angloamericanplatinum.com/~/\\_media/Files/A/Anglo-American-Platinum/documents/2015-integrated-report-final-v2.PDF](https://www.angloamericanplatinum.com/~/_media/Files/A/Anglo-American-Platinum/documents/2015-integrated-report-final-v2.PDF).

<sup>24</sup> Ibid.

Anglo Platinum's Annual Integrated Reports indicate that from 2017 Bokoni Mine was placed under care and maintenance.<sup>25</sup> Although no longer fully operational it should be noted that the mine's obligations to fulfil their SLP commitments remain intact and binding on the company as no indication from the DMRE regarding any halt in the implementation of SLP projects has been published.

## CONCLUSION

The manner in which the SLP formulation process is currently undertaken by mining companies lacks integrity as it is not connected to the aspirations of the community and appears to be exclusive, as indicated by the social audit results. Furthermore, the Bokoni Platinum Mine is yet to provide substantive evidence to support adequate community development. Many of the people who were interviewed still face abject poverty, are unaware of SLPs, and do not benefit from the initiatives stated in the SLP. Unemployment rates are even higher in the area because of previously self-employed farmers and small business owners losing their land to the mine, and now being part of the ranks of unemployed Sekhukhune residents. According to information provided by the community and as can be seen in the aforementioned paragraphs, the community approached the DMR and inspections were done in direct comparison with the annual compliance reports sent by the Bokoni Platinum Mine. DMR found serious non-compliance with the SLP commitments and the mine was mandated to build the skills development centre they had neglected to build.

The mine must be called on to provide clear evidence and substantive proof of the actual benefits arising for the Atok residents, particularly from villages directly affected by the mine, from its commitments for this 5 year period. This includes physical verification of each project and bringing forward the direct beneficiaries. These remedies are necessary in order to achieve the aims of the MPRDA and to provide meaningful development for the communities affected by their operations.

---

<sup>25</sup> Anglo American Platinum Limited, "Integrated Report 2017", 2018, accessed on 08 February 2022, [https://www.angloamericanplatinum.com/~/\\_media/Files/A/Anglo-American-Platinum/annual-report-2017/anglo-platinum-integrated-report-2017.pdf](https://www.angloamericanplatinum.com/~/_media/Files/A/Anglo-American-Platinum/annual-report-2017/anglo-platinum-integrated-report-2017.pdf).

**APPENDICES:**

**Appendix A: Overall Results and Observations**

ITEM	QUESTION	ANSWER	COMMENT
DEMOGRAPHICS	Gender	M = 81 F = 112	
	Age	10-19 = 5 20-29 = 50 30-39 = 56 40-49 = 38 50-59 = 25 60-69 = 15 70-79 = 4	
CONSULTATION	Do you know what a Social and Labour Plan is?	Yes = 11 No = 182	94.3% of the respondents did not know what a social and labour plan is, while only 5.7% (11 out of 193 people interviewed) knew about a social and labour plan.

	<p>Have you ever been consulted in the formulation of an SLP?</p>	<p>Yes = 10 No = 183</p>	<p>When asked if they had ever been consulted by the mine in the formulation of the SLP, only 10 (5.2%) of the respondents assented to having been consulted by Bokoni Mine on a previous occasion, while 183 (94.8%) had not been consulted in the formulation of the SLP.</p>
--	---	------------------------------	---

	If yes, when?	1942 = 1 1969 = 6 2001 = 1 2005 = 2	However upon taking a closer look, many of the respondents were consulted by Bokoni Mine prior to 2002 when SLPs became part of South African law. Only 2 people (20%) had been consulted after 2002. Therefore the others were not consulted on the formulation of the SLP, but rather on other matters.
BURSARIES/INTERNSHIP	Has anyone from your family received a bursary from Bokoni Mine?	Yes = 8 No = 185	Some people (8) from the community had received bursaries from Bokoni Mine.

	<p>If yes, in which year and in which field of study?</p>	<p>2010; Don't know = 1  2014; Don't know = 1  2016; Don't know = 4  2016; engineering = 1  2016; education = 1</p>	<p>This occurred between 2010 and 2016. However many of the respondents did not know what the students studied.</p>
	<p>How did you find out about the bursary?</p>	<p>Community = 6  N/A = 2</p>	<p>From the responses received it would seem that the bursaries were predominantly communicated via word of mouth around the community.</p>

	<p>Did the person receive training after the completion of their studies?</p>	<p>Yes = 6 No = 1 Still studying = 1</p>	<p>According to 6 respondents (75%) after completion of their studies, the bursary students received training from the mine. 1 respondents asserted that the person was still studying and then another respondent denied that the bursary student received training after the completion of their studies.</p>
	<p>Do you know the mine that hired the person?</p>	<p>Bokoni Mine= 3 Don't know = 5</p>	<p>According to 37.5% of the respondents Bokoni Mine hired the former students. However, the rest did not know.</p>

ACCESS ROAD	Do you know of a road constructed by Bokoni Mine between the years 2013 and 2017?	Yes = 20 No = 173	20 people (10.4%) knew of a road constructed by Bokoni Mine between the years 2013 and 2017, whereas 173 people (89.6%) did not.
	Do you know where the road is?	Mogkotho = 1 Brakfontein = 1 Tipeng = 1 Maruping = 8 Monametsi = 1 Yes = 8	However when asked where this road was situated, different answers were given by the respondents. Most commonly Maruping.
	What kind of road is it?	Gravel road = 10 Tar road = 10	There was uncertainty as to whether the road was a tar or gravel road that was constructed, because the respondents who knew the road offered a 50/50 response for gravel and tar.

	Do you know which mine constructed that road?	Bokoni Mine= 7 Brakfontein = 1 Don't know = 12	The majority of respondents that knew where the road was situated, noted that the mine was constructed by Bokoni Mine (35%). Whereas one (5%) noted Brakfontein and 60% did not know.
MONAMETSI SKILLS DEVELOPMENT CENTRE	Do you know of a building in the community that is for skill development?	Yes = 6 No = 187	Only 3.1% of people knew of a building in the community used for skills development, while 96.9% of respondents did not know of any such building.

	<p>If yes, what kind of skills development is being offered at that centre?</p>	<p>Mining skills = 4 Learnership = 1 Don't know = 1</p>	<p>Of the 6, that knew of the skills development centre, 4 (66.7%) answered that the centre provides the community with 'mining skills', one (16.7%) answered 'learnership' and another (16.7%) did not know what was provided in the skills development centre</p>
	<p>Where is the centre built and in which year?</p>	<p>2013 = 1 2015 = 2 There is no centre = 3</p>	<p>Upon taking a closer look, of those 6 who had said they know of the skills development centre 50% said that there is no centre, and they were referring to knowledge of the commitment, while 2 (33.3%) noted that it was built in 2015 and 1 (16.7%) noted</p>

			that it was built in 2013.
SMME DEVELOPMENT	Do you know of anyone who has been assisted by Bokoni Mine to develop their business between the years 2013 and 2017?	Yes = 2 No = 191	Only 2 people that were interviewed (1%) knew of businesses that had been assisted by Bokoni Mine to develop between 2013 and 2017, while 99% of people did not know of any businesses.
	Where does the person come from?	Maruping = 1 Don't know = 1	The one person came from Maruping and the other did not know

			where the person was from.
	What type of business do they have?	Agriculture = 1 Don't know = 1	The business assisted was an agricultural business.
	Is there a business forum in the community?	No = 2	Both people who knew of the businesses that were assisted by Bokoni Mine asserted that there was no business forum in their community.
SUPPORT FOR PEOPLE WITH DISABILITIES (EX MINE EMPLOYEES)	Do you know of anyone who has gotten injured while working for Bokoni Mine?	Yes = 49 No = 144	49 (25.4%) of the respondents knew someone that had been injured at Bokoni Mine while working there, while 74.6% did not know people who were injured on the job.

	When were they injured?	1999 = 1 2000 = 1 2001 = 1 2004 = 2 2006 = 1 2008 = 3 2009 = 2 2010 = 1 2012 = 3 2013 = 2 2014 = 9 2015 = 5 2016 = 12 2017 = 4 Don't know = 2	
--	-------------------------	---	--

	Do you know of a centre built to benefit people with disabilities at the mine?	Yes = 1 No = 173 N/A = 19	Only one person knew of the centre built to benefit people with disabilities at the mine. 19 (9.8%) declined to answer and 173 (89.6%) of the respondents responded that there was no centre built to benefit people with disabilities at the mine.
	Where is it built?	Brakfontein = 1 Marupong = 2 Monametse = 1 No site = 1 Don't know = 15	
GENERAL	What kind of assistance would you like from the mine for your community?	Road, Water, job opportunities	