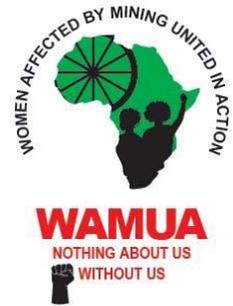




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SOCIAL AUDIT REPORT

MOKOPANE

IVAN PLATS MINE

2022

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BACKGROUND

Mogalakwena Local Municipality is in the Waterberg District of Limpopo in the Northeast region of South Africa. The town of Mokopane is in the Southeast of the Mogalakwena Local Municipality. Previously known as Potgietersrus, the town was named after the Chief of the Tlou Tribe, Chief Mokopane, in the 1850s.¹ Platreef Mine, located in the Southeastern region of Mokopane, is a large-scale producer of palladium, nickel, copper and gold. The mine is 64% owned by Ivanhoe Mines through its subsidiary, Ivan Plats.² South African beneficiaries of the companies black economic empowerment structure have a 26% stake in the mine, while the remaining 10% is owned by a group of Japanese companies: ITOCHU Corporation; Japan Oil, Gas and Metals Corporation; and Japan Gas Corporation.³

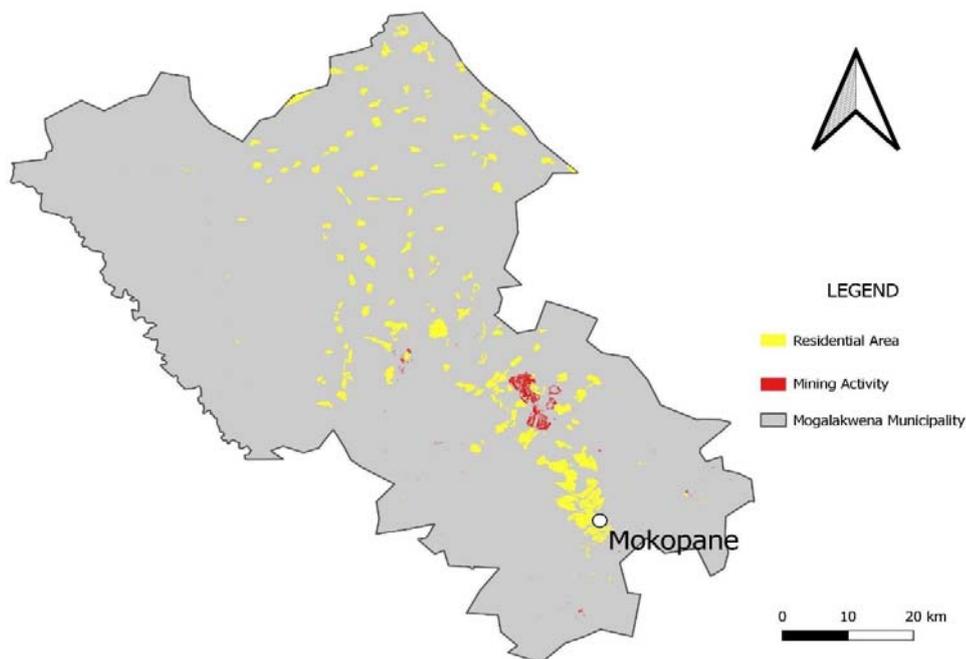


Figure 1 Map of Mokopane

¹ Mogalakwena Local Municipality, "History", 2020, accessed 17 January 2022, <http://www.mogalakwena.gov.za/?q=node/15>.

² Ivanhoe Mines Ltd, "Platreef Projects", 2022, accessed January 14 2022, <https://www.ivanhoemines.com/projects/platreef-project/>.

³ Ibid.

Demographics

The Mogalakwena Local Municipality, which Mokopane is in, has a population of 307 682 residents.⁴ 96.1% of the residents are black African, 3% are white, and the remaining 0.9% makes up the rest of the population.⁵ 53.3% of the population is female and 46.7% are males.⁶ Education in the region remains a big issue, with 15.9% of people in the area over the age of 20 having no schooling.⁷ According to Census 2011, 42.3% of the 17 525 households in Mogalakwena have access to pipes water in their yard and 20.2% of the households have access to pipes water in their dwelling (this is the lowest figure in the Waterberg District Municipality).⁸ Additionally, 66.8% of the population use pit toilets.⁹

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 is put to the test. This process empowers 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.

An 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 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.

⁴ Statistics South Africa, "Mogalakwena", 2011, accessed 17 January 2022, http://www.statssa.gov.za/?page_id=993&id=mogalakwena-municipality.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.

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 a community to engage with the mining 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.

The need to conduct a social audit arose from communities surrounding the mine, not being aware of developmental projects established by the mine in their communities. As such the aim of the social audit was to establish whether there has been any tangible and sustainable development done by Ivan Plats Mine between the years of 2014 and 2018. 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 in which they operate. Their Corporate Social Investment (CSI) strategies are often conflated 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 to companies and communities are empowered by the MPRDA to require these commitments from the mining companies. The best methodology to interrogate the claims of mining 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.

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 communities of Mosesane, Tshamahandzi, and Zone 3.
2. Assess whether Ivan Plats Mine's SLP obligations are effective, efficient and provide sustainable goals to the communities of Mosesane, Tshamahandzi, and Zone 3 in the Mokopane area.
3. Determine if appropriate measures exist that:
 - establish, monitor and communicate the SLP process and procedures with the community,
 - ensure reliable information is available for all stakeholders involved including the Mosesane, Tshamahandzi, and Zone 3 communities,

- 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 a mining right. According to the Mineral and Petroleum Resources Development Act¹⁰ (MPRDA), mineral resources of the country are the common heritage of all who live in South Africa. 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 mining and petroleum industries and to benefit from the exploration of the nation’s mineral and petroleum resources’.¹¹ 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 regulation 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’. 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 labour sending areas.

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

¹⁰ *Mineral and Petroleum Resources Development Act 28 of 2002.*

¹¹ *Mineral and Petroleum Resources Development Amendment Act 49 of 2008 at s2.*

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.¹² 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.

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.

¹² Mining and Petroleum Resources Development Regulations at s45.

WOMEN IN MINING-AFFECTED COMMUNITIES

Women who are not formally employed are the backbone of the functioning of mining-affected communities.¹³ 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 and benefit accrual 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.

Men in mining-affected communities as such 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.¹⁴ 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.

¹³ Asanda Benya, "The invisible hands: women in Marikana", *Review of African Political Economy* 42, no. 146 (2015) at 545-560.

¹⁴ 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 28-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 an interview. In the community of Mokopane three areas and a total of 229 households were surveyed; Mosesetjane (49), Tshamahandzi (133), Ramaga-Mahongoa (Zone 3) (47) (see below).

Community in Mokopane	Number of participants
Mosesetjane	49
Tshamahandzi	133
Zone 3	47

Of the total of 229 households, 91 Males (39.7%) and 138 Females (60.3%) were asked questions and provided answers about their experience of Ivan Plats Mine and the projects done by Ivan Plats Mine. Most commonly the respondents were between the ages of 20-29.

The results show that there are a total of 4 out of 229 households that have at least one person living in their household who also works at Ivan Plats Mine. Only 1.7% of the people from the local area of Mokopane, surrounding Ivan Plats Mine, are employed by the mine and on average 6 people live in a household.

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 10-14 May 2021 and data collection occurred specifically on 12th May 2021. A process of going door-to-door was implemented and interviews were held in the households. After

the fieldwork, a de-brief 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. Meeting with the municipality
11. Reflecting and follow up

WHAT IVAN PLATS MINE COMMITTED TO UNDERTAKE DURING THE SLP YEARS AUDITED (2014-2018): LOCAL ECONOMIC DEVELOPMENT (LED)

1. Sanitation for Schools and Community Clusters (Budget allocated: 18.3 Million)

- The mine committed to build VIP toilets for schools within affected communities in Mogalakwena in line with the 2012-2016 IDP.
- Initiate sanitation campaigns and awareness programmes between 2014 and 2018.
- Set up an advisory committee of mine representatives and government representatives (dept. of education & Local Municipality) to ensure sustainability.
- Sanitation will include:
 - i. VIP toilets
 - ii. Suitable sanitary products

2. School Support and Development Programme (Budget allocated: 14.4 Million)

- 8 Schools were identified.

- The mine committed to sponsor schools with teachers, upgrade equipment and develop infrastructure depending on the school.
- Introduction at Thobela School, Madiba Village.
- Stakeholder involvement (Dept. of Education).

3. SMME's Development and Poverty Alleviation (Budget allocated: 31.5 Million)

- A) SCRAP METAL
 - i. The mine committed to set up a co-operative to manage a scrap metal and recyclables project,
 - ii. Focus on ownership, job creation, sustainability, independence, etc.
 - iii. Mine will provide:
 1. Assets
 2. Skills
 3. Resources
 - iv. Provide a project advisory committee.
- B) CRUSHER & AGGREGATES
 - i. The mine committed to set up a consortium to manage and operate a crusher, cement and aggregate plant project.
 - ii. Focus: ownership, skills transfer, job creation, and open future opportunities.
 - iii. Mine will provide:
 1. Assets
 2. Skills
 3. Resources
 - iv. Mine will set up a Board of Directors to steer and advise the consortium for the duration of the project.
- C) SEWING & LAUNDRY
 - i. Mine committed to set up a co-op for a sewing and laundry project.
 - ii. Focus: ownership, skills transfer, empowering women, youth, people with disabilities, meet broader developmental needs and job creation.
 - iii. Co-op will be grown for future opportunities by increasing its production capacity.

iv. Set up a Project Advisory Committee.

4. Lesedi Early Childhood Development and Business Centre (12.0 Million)

- Mine committed to establish an Early Childhood Development and Business Centre in Kgobudi Village in Mosesetsane to:
 - i. care for children
 - ii. provide home-based care for the elderly
 - iii. run programmes focusing on supporting vulnerable children
 - iv. reinforce community infrastructure and
 - v. focus on community upliftment
- Management of Development and Business Centre will submit monthly reports and Quarterly progress reviews will be held with Mine reps and Government reps (Municipality etc.).

5. Construction of Multi-purpose Community Centre's at High Density Community Cluster (Budget 11.5 Million)

- Mine committed to build community centre's at each economic hub (e.g. taxi rank).
- The mine undertook to have a labour desk and communication office, a procurement information office, and training facility where possible at the community centre.
- Mine will:
 - i. Assist with equipping offices.
 - ii. Ensure community learners who've completed their construction skills development programmes gain practical experience.

RESULTS AND DISCUSSION

The results of the social audit (see Appendix A) were analysed in relation to the commitments made by Ivan Plats Mine in their SLP. This includes an analysis of consultation practices by Ivan Plats from a community perspective, the development of the multi-purpose centre, the Lesedi Early Childhood Development and Business Centre, the School Support and Development Programme, as well as general awareness and benefits received by the communities. There is no legal obligation on mines to provide communities with copies of their Annual Compliance Reports¹⁵. Therefore, it is important to evaluate the progress of SLP commitments by analysing community perceptions of commitments made in the SLPs.

CONSULTATION

Out of 229 people surveyed, 195 of them had never been consulted by Ivan Plats Mine even though the communities are a mere 3-10 km away from the mining operations. Only 15.3 % of respondents had been consulted by Ivan Plats before and 85.2% had never been consulted by Ivan Plats Mine. This speaks to an insufficient consultation process being implemented by the mine because 221 people did not know what an SLP is or what it contains, further speaking to the lack of consultation of the local community and engagement by the mine in a public participation process.

Although a slightly higher number of people have heard of an SLP, they do not know what an SLP is, it's because they have been involved in protests against other mines in the area where an SLP was mentioned. This means that it is very likely that 96.5% of people living in the greater Mokopane area have never seen an SLP before in their lives and are unable to hold the mines to account with regards to developmental projects that should be happening in their communities. While 3.5% of people living in the communities were aware what an SLP is, 89.1% of the total group noted that they did not know that they had a right to ask for a copy of one because they had never been given access to one before (as well as most not knowing what an SLP is).

It's very important to note that the MPRDA, which governs the laws around what mining companies obligations are in relation to host communities are, states that mining companies are required to publish their SLPs on their websites, make copies available in public areas (such as libraries, municipal buildings, schools etc.) and make announcements publicly (be it on

¹⁵ A document which mining companies submit to the Department of Mineral Resources outlining the progress of mining companies in relation to the implementation of SLP projects.

broadcasting stations or via posters at high volume areas) as to where copies of the SLP can be found. There is also a duty on mining companies to hold a minimum of 3 meetings per year with communities in order to keep them updated on the progress of developmental projects in their communities. These meetings and consultative processes are meant to be inclusive of the whole community and not just representative structures such as local traditional authorities, in accordance with the legislation. However in accordance with these findings, that is not happening in the case of Ivan Plats.

MULTI-PURPOSE CENTRES

Ivan Plats Mine committed to build multi-purpose community centres at economic hubs around the Mogalakwena Municipal area, which were supposed to have a labour desk and communication office, a procurement office, and training facilities where possible amongst other things. These multi-purpose centres were supposed to be built within the period of the SLP (2014-2018). The common assertion amongst respondents was that no multipurpose centres were built by Ivan Plats Mine.

212 people, which amounts to 92.6% of the respondents, did not know about the commitment to build multi-purpose centres in the Mogalakwena area. Only 7%, which amounts to a total of 16 people, were aware of the commitment to build multi-purpose centres in Mogalakwena. The stark difference between the amount of participants who know and who do not know about the multi-purpose centres further indicates a lack of communication of SLP commitments by Ivan Plats to the host communities.

In addition, 219 out of the 229 people who were surveyed (95.6%) asserted that they did not know anyone who had completed their practical studies building the multi-purpose centres. This is more than likely due to the fact that the mine did not build any multi-purpose centres in Mogalakwena between 2014 and 2018. When asked how many Multipurpose Centres existed in Mogalakwena the majority (56.8%) of the respondents only knew of one and 21.8% knew of none, with 21% of the respondents neglecting to answer the question.

In addition to the practical building experience that community members would have garnered if the multi-purpose centres were built, 70.7% of the community respondents believe that there would be an overall benefit gained from having a multi-purpose centre in their community. The

respondents indicated that the main benefits would be for the youth in the community, who could gain skills and find jobs.

LESEDI EARLY CHILDHOOD DEVELOPMENT AND BUSINESS CENTRE

In its SLP, the Ivan Plats mine committed to establish a centre that would care for children, provide home-based care for the elderly, run programmes focusing on supporting vulnerable children, reinforce community infrastructure and focus on community upliftment through the business centre. Out of the 229 people asked, only 17 (7.4%) knew of Lesedi Early Childhood Development Centre and described it as a day-care centre for vulnerable children. When asked since when the centre had been operating, only 3 respondents could give a response citing 1997 (1) and 1999 (2) (well before the drafting of the SLP for the 2014 to 2018 SLP cycle). Others in the community did not know when it was established because they did not know about Lesedi. Given the impoverished state of Kgobudi Village, a project that would cost the mine approximately 12 million Rands would surely be well known, bringing into question the extent to which Ivan Plats Mine contributed to the establishment of the centre because people in the community do not know of its existence. Furthermore it brings into question the budgetary allocations and how the monies were distributed for the project.

In relation to the service and value this centre brings to the community, only 5 (2.2%) out of 229 people had actually been to Lesedi Early Development Centre. Only 4 people knew about the services that Lesedi offers, and when asked what kind of impact the centre has in the community, only 3 people responded that it has a positive impact, while 218 responded with 'I don't know'. One person who knew about the centre actually worked there and added that for him it brings value as it provides him with a job. It is unclear who was consulted when the decision was taken to stipulate the establishment of Lesedi. Little benefit is seen in the project, while it is unclear whether the project was actually executed due to the low number of respondents indicating their knowledge of Lesedi.



Image 1: Picture of garden at Lesedi Early Development Centre

When the social audit team visited the centre, they were not welcomed into the space. However, they were able to see that there was no business centre at the location which was open for the public to use. Furthermore, there was only one room at the location which was used for the care of the children who would be dropped off by their parents in the mornings, and later collected by their parents in the evenings. The team was told that the roof had been refurbished by Ivan Plats Mine and that the grounds had been renovated to include a play area, but there was no sight of any other upgrades that had taken place and the place still looked like it was under construction. There was also a nursery on the property which had been destroyed by a lack of care over the COVID-19 lockdown period and couldn't bear produce.

SCHOOL SUPPORT AND DEVELOPMENT PROGRAMME

Ivan Plats Mine committed to sponsor schools with teachers and after school programmes, upgrade equipment and develop infrastructure – depending on the needs of the schools – at various schools which were identified in their SLP, however the list was not a closed list.

Schools were identified by the Social Audit Team: Legae Labana Daycare Centre, Alfred B. Makapane High School, Gobela High School and Ben Hlongwane High School.

When asked whether there were Saturday classes at Ben Hlongwane High School between 2014 and 2018, 157 of respondents (68.6%) insisted that there were no Saturday classes at the High School, however 64 (27.9%) remembered there being Saturday classes at the High School. When asked whether the classes had been sponsored by Ivan Plats Mine, 163 (71.2%) answered 'no', while 53 (23.1%) simply stated that they were not sure whether the mine had paid for the Saturday

Classes. Only 13 people (5.7%) thought that the mine had paid for the classes. Nevertheless, the majority were insistent that grade 11 and 12 children used to go to the school to help each other with work that they had been struggling with during the term and that there were no formal classes being held over the weekends.

When asked if there had been a development and school support programme at Gobela High School 187 people, 81.7% of the respondents, had never heard of a school development and support programme at Gobela High School, and 18.3% had. They noted this school and support programme as including extra classes for school children in maths and science. When asked about infrastructure development, 28 people (12.2%) agreed that there had been infrastructure built at Gobela High School between 2014 and 2018, whereas 81.2% disagreed and 6.1% did not know whether or not there had been any infrastructure upgraded at Gobela High School. When asked whether or not these projects were sponsored by Ivan Plats Mine, 29 people (12.7%) did not know whether or not the projects at Gobela High School were sponsored by Ivan Plats Mine, while only 22 people (9.6%) agreed that Ivan Plats was behind upgrades to infrastructure and the school development programmes at the High School. 178 people (77.7%) did not hold the view that Ivan Plats had contributed to the betterment of Gobela High School.

Out of 229 people, 187 (97.4%) of the people surveyed had never heard of a school development and support programme at Alfred B. Makapane High School. When asked about infrastructure, 97.4% of people disagreed that there had been any infrastructure built at the High School. The Social Audit Team found that there had been some upgrades to infrastructure at the school, but that those upgrades were insufficient. Instead of upgrading the existing computer lab which was bigger in size and more spacious, Ivan Plats Mine contributed to Alfred B. Makapane High School by building a mobile science and computer lab at the school, but they never contributed to extracurriculars. The school had actually asked for an admin block to be built and wrote to the mine asking for support in that regard, but they never received that administration block, nor did they receive a response from the mines in that regard. Nevertheless, the mine reported to DMR

that they assisted the school in terms of funding and furnishing an administration building at Alfred B. Makapane amongst other schools in 2017.

While in the field, the Social Audit Team spoke to 2 principals at the schools noted and one said that although there were no formal Saturday classes for learners at any of the schools, Ivan Plats paid for specially gifted learners (in maths and science) from different schools to attend a competition sponsored by the mine during the course of the SLP (2016-2018) wherein they were taught extra classes and given tutoring over the course of the weekends at a central location.



Image 2: Computer lab container at Ben Hlongwane

When asked about bursaries and bursary opportunities offered by Ivan Plats Mine, only 10 people knew someone who had received a bursary from Ivan Plats Mine, which is sufficient evidence that there have been people who have benefitted from a bursary from Ivan Plats.

With regards to Legae La Bana, Ivan Plats Mine committed to spending R1 540 652 on upgrades to the infrastructure, assistance in education and



Image 3: Legae La Bana Day Care

playcare for mentally and physically disabled children amongst other interventions. However, when asked if there was a day care centre for that amount built between 2014 and 2018, 227 out of 227 community members (99.1%) denied knowing of any such intervention in their community and only 13 (5.7%) knew of Legae La Bana Day Care Centre while 216 (94.3%) did not. When the Social Audit Team visited Legae La Bana Day Care Centre on a Wednesday afternoon in 2021, the day care was no longer functional which speaks volumes as to why many people in the community were unaware of its existence. Furthermore, the day care centre was the size of a garage which begs the question, what upgrades were contributed by Ivan Plats Mine, as the garden patch was also very small and un-nurtured.

*During the Social Audit report-back, in a community meeting, it was noted that the status of the above projects has not improved since the last social audit visit. Some community members accompanied the Social Audit Team to the Legae la Bana site. It can be confirmed that the dwelling and site have not been improved, and that the “VIP” toilets built by Ivanplats are two ‘long-drop’ corrugated iron pit toilets. When asked, the neighbours further confirmed that the site has not been used in over a year.



Image 4: Legae La Bana garden project

GENERAL

When asked whether the community is aware that they must benefit from the local mine, 83 out of 229 people (36.2%) did not know that they were entitled to benefit from the mines that surround them, as host communities. 146 people (63.8%) were aware of that fact even though the social audit revealed that there was little to no benefit that the communities of Ga-Mokaba were receiving from the mines

surrounding them. 21 people (9.2%) further noted that when there are projects being undertaken in their community they find out about them from word of mouth, whereas 141 people (61.6%) noted that they do not even know when there are projects being done by the mine in their community. More importantly to note is that when asked whether the mine has ever called a community meeting, only 23 people (10%) answered in the affirmative while 206 people (90%) were insistent that the mine has never called a community meeting in order to discuss the needs of the community. Therefore, it's either only a select few who are being called to these meetings, which are not inclusive of the entire community, or people are not aware of the meetings being called which means that the meetings are not being widely advertised.

The Social Audit Team then proceeded to enquire what kinds of things the community would list if they were given an opportunity by the mine to develop their own Social and Labour Plan or even give their inputs. These were the suggestions from the community based on their needs: Roads,

water, library, streetlights, jobs, clinic, shelters/orphanages, improving schools, community hall, and SMME assistance.

LOCAL ECONOMIC DEVELOPMENT AND PHYSICAL VERIFICATION

Local Economic Development (LED) is an approach towards economic development which allows and encourages local communities, government, and private sector to work together to achieve sustainable economic growth and development, by promoting economic benefits and improving the quality of life for all residents in the affected local municipal area. In this way the mining companies make legally binding commitments, through the formulation of the SLP, to achieve certain socio-economic developmental goals throughout the cycle of the social and labour plan.

During physical inspections of the sites where the projects of Ivan Plats Mine were we found the following:

1. Multi-purpose centres

- a. There were no multipurpose centres built by Ivan Plats Mine during the years 2014-2018.
- b. There is only one multi-purpose centre in Mokopane, which is situated in Mahwelereng, but it has been in existence and has nothing to do with the mine but independent companies.

2. Lesedi Early Childhood Development and Business Centre

- a. There is no business centre at the location.
- b. Lesedi is a childcare centre for vulnerable children and the people that work there are the wives of the traditional authorities in Mokopane according to locals.
- c. When visited, the people working at Lesedi asserted that Ivan Plats Mine did assist with renovations to the roof of the centre and that the mine also helped them establish a food garden which was no longer functional due to the COVID-19 pandemic.

3. School support and development Programme

- a. Ben Hlongwane High School did have containers in which Ivan Plats Mine had put a science lab.
- b. Alfred B. Makapane High School did have containers in which a science lab and computer lab were established in by Ivan Plats Mine, instead of renovating and

refurbishing the existing science lab building. These computers were, however, dysfunctional at the time of the site visit.

- c. Legae La Bana was not in operation in the community. A small 2-room dwelling, and a garage were found at the location.
- d. Some people have been awarded bursaries from Ivan Plats Mine. Only a few people could confirm this.

MEETING WITH THE MINE

The Social Audit Team, along with community members who form part of MACUA & WAMUA, met with Ivan Plats Mine to discuss their 2014-2018 Social and Labour Plan. Ivan Plats Mine asserted that their SLP term was from 2015-2019 but failed to provide proof of a letter from the Department of Mineral Resources (DMR) acknowledging the amendment in relation to the operating term of Ivan Plats' SLP, even after being asked multiple times. Nevertheless, Ivan Plats asserted that they did their best to comply with the obligations of their SLP. It was the Social Audit Team's contention that the mine could have done a better job at the selection and execution of their projects.

When asked to consult the community on their next SLP, the mine stated that they had consulted with traditional authorities. It was made clear to the mine, during the meeting, that they have an obligation to consult with communities directly and not solely with communities by representation. Furthermore MACUA & WAMUA specifically stated their interest in being directly consulted by the company as it regards the SLP. However, Ivan Plats Mine continued to refuse to meaningfully consult with the community. Despite agreeing to share the draft SLP 2 with MACUA WAMUA representatives, in order to engage in meaningful consultation with 'interested and affected parties', the mine failed to honour their commitment.

Overall, the meeting was not fruitful and did not amount to meaningful engagement as the mine explained that they spent more than they had budgeted on the SLP projects, even though the social audit revealed that the projects in the SLP were predominantly defunct and not sustainably beneficial to the community. Furthermore, there is no evidence that Ivan Plats Mine has been operating with an SLP since the end of its SLP in 2018, until the release of the 2021-2025 SLP; which is at odds with the Mineral and Petroleum Resources Development Act (MPRDA).

INTEGRATED REPORT DISCUSSION

At the end of 2015, the mine reported in their Annual Compliance Report to DMRE that they had completed the vegetable netting at Thobela and Legae La Bana, as well as the installation of the rainwater harvesting unit at Legae La Bana, they also reported having supplied all secondary schools within their list (such as Ben Hlongwane High School, Gobela High School and Alfred B. Makapane High School etc.) with science lab containers which were handed over in 2016. The mine stated that they also delivered, fully installed and handed over computer laboratory containers to the beneficiaries. The mine also reported having initiated the registration of an Early Childhood Development Centre at the newly renovated Lesedi Community Centre, with an office area which was renovated and earmarked for business development.

At the end of 2016 Ivan Plats Mine reported supporting community-led projects by the Platreef Communities Umbrella Trust. The mine further reported having maintained the installed computer laboratories as well as replenished science laboratory equipment, fixed a pump at Legae La Bana day care centre for the purposes of the vegetable garden, and refurbishing the burgled computer lab at Ben Hlongwane High School twice. The mine also reported introducing Monkeynastix, which is children's physical activity programme, establishing a nursery and providing the volunteers at Lesedi Community Centre (Early Childhood Development Centre) with basic first aid and fire fighting training. With regards to the Multi-purpose centres, the report alleged that conceptualisation and designing occurred in 2016, but that they found that the Multi-purpose centres would be unsustainable and a new approach to make them viable was identified, which was to develop a Community Development Centre. The plan was to make sure there is a sustainable base which could provide services to the mining community of Mokopane. However, according to Ivan Plats in 2016, the project was delayed due to the graves which had to be moved. It hardly makes sense why the mine would select a site which cannot be used for a project, and then blame their inability to complete the project on the location.

Nevertheless in 2017, Ivan Plats reported on the projects implemented in the previous years, pertaining to the science kits and science laboratories, the vegetable garden at Legae La Bana, and the maintenance of the computer labs that are used by the schools for research and not part of the curriculum. Ivan Plats further reported on the upgrade of admin offices where desks, chairs and cabinets were delivered to Alfred B. Makapane, Ben Hlongwane and Gobela High School's amongst others. According to the mining company's annual reports the following upgrades took

place: the installation of flood lights and maintenance on the hand pump at Lesedi Early Childhood Development Centre, as well as the installation and provision of computer equipment and furniture for the Lesedi Business Centre, along with burglar proofing for the business centre. In addition, the mine reported that the planned Multi-purpose centres were not built due to the grave relocation delay.

In 2018 the mine reported that their efforts were focused on ensuring that implemented projects would be sustainable after the finalisation of the SLP term. Ivan Plats also reported that they had installed electronic white boards at beneficiary secondary schools.

In 2019, Ivan Plats Mine reported that they worked with Amoricom to provide educator training on the Smart Boards to 5 schools including Alfred B. Makapane Secondary School and Ben Hlongwane High School, they also reported having installed a sanitation unit at Legae La Bana day care centre and replenishing the science kits at various schools.

The mine also reported having supplied Alfred B. Makapane, Ben Hlongwane and Gobela high school, amongst others, with administration blocks and furniture. However, when these schools were visited by the Social Audit Team there was no acknowledgement of any contribution by the mine to an admin facility at these schools, because the admin blocks did not exist, and there were no visible signs of smart board capabilities at the schools audited. With regards to Lesedi Early Childhood Development Centre, the mine reported that the SLP projects around the centre brought new infrastructure, such as artificial soccer and netball courts, an outdoor playground, and additional temporary buildings as well as the borehole pump and kitchen renovations. In 2021 there was no soccer pitch found on the grounds by the Social Audit Team. According to the mine, the furniture and computer equipment for the Lesedi Business Centre and the Wi-Fi connections were installed in 2017 and maintained, however there did not seem to be any knowledge of a business centre amongst community members nor did it seem that the business centre is in use and fully equipped. However, it must be noted that there are Wi-Fi capabilities at Lesedi.

*During the social audit report-back visit, it was noted that when the community enquired regarding the actual costs of the projects, the mine declined to disclose because their policy does not allow them to do so. Yet the Regulations require such disclosure on an annual basis.

CONCLUSION

This report has illustrated that Ivan Plats Mine has failed to uphold its obligations stipulated in their SLP. It is clear that communities in Mokopane were not adequately consulted in the development of the SLP, as indicated by the results of this study. Failure to adequately consult communities has resulted in the mine's obligations not being upheld, with only a small group of people reaping any benefits of some projects that were actually completed. Other projects, such as infrastructure upgrades at schools in the area, seem to have been hugely mismanaged such as the Legae La Bana Day Care Centre. The Social Audit Team were able to verify the the projects upon physical inspection and found that many of the projects implemented by Ivan Plats did not meet the standards described in their SLP or annual reports. Furthermore, the team attempted to engage with Ivan Plats, who were unable to participate in a meaningful conversation to improve the performance of their future SLPs through direct consultation by communities. Ivan Plats Mine refused to involve the broader community and stated their intention to continue consultations with community representatives exclusively, undermining the notion of Free Prior and Informed Consent (FPIC). Ivan Plats Mine stated that they did their best to comply with their SLP, however it is clear that their projects were massively mismanaged and inadequate. Furthermore, the mine provided inaccurate annual compliance reports which conflicted with the site inspections done by the Social Audit Team. Ivan Plats Mine did not comply with the obligations set out in their SLP, and this discrepancy in reporting as well as the lack of sustainability needs to be investigated by the DMR.

APPENDICES:

Appendix A: Overall Results and Observations

ITEM	QUESTION	ANSWER	COMMENT
Demographics	Gender	Male = 91 Female = 138	
	Age	10-19 = 7 20-29 = 63 30-39 = 62 40-49 = 41 50-59 = 24 60-69 = 19 70-79 = 12 80-89 = 1	

	Number of people living in your household?	2 = 9 3 = 16 4 = 28 5 = 43 6 = 33 7 = 40 8 = 23 9 = 11 10 = 11 11 = 6 12 = 2 13 = 1 14 = 3 15 = 2 19 = 1	
	Is anyone working at Ivan Plats Mine in your household?	Yes = 4 No = 225	
Consultation	Have you ever been consulted by Ivan Plats Mine?	Yes = 32 No = 195 N/A = 2	15.3 % of respondents had been consulted by Ivan Plats before and 85.2% had never been consulted by Ivan Plats Mine. 0.9% are not sure whether or not they have been consulted, which speaks to an insufficient

			consultation process being implemented by the mine.
	Do you know what a Social Labour Plan is?	Yes = 8 No = 221	Out of the 229 people interviewed 221 (96.5%) do not know what an SLP is or what it contains in it, further speaking to the lack of consultation. Although a slightly higher number of people have heard of an SLP, they do not know what an SLP is.
	Do you know you have a right to ask the mine for their SLP?	Yes = 25 No = 204	89.1% of the people interviewed did not know that they had a right to ask for an SLP. Which is on brand because the community did not even know what an SLP is nor what is contained therein.

<p>Multi-purpose Centre</p>	<p>Did you know that between 2014 and 2018 Ivan Plats committed to build multi-purpose centres in Mogalakwena Local Municipality?</p>	<p>Yes = 16 No = 212 N/A = 1</p>	<p>The common assertion amongst respondents was that no multipurpose centres were built by Ivan Plats Mine and 92.6% of the respondents did not know of the commitment to build multi-purpose centres in the Mogalakwena area. Though 7% were certain that they were aware of the commitment to build multi-purpose centres in Mogalakwena. This speaks further to Ivan Plats' pervasive inability to communicate their SLP commitments</p>
	<p>Do you know of people who completed their construction studies that worked on building the multi-purpose centres as part of their practical experience</p>	<p>Yes = 9 No = 219 N/A = 1</p>	<p>Only 3.9% of the people interviewed agreed to having known students that built multi-purpose centres as part of their practical's. The rest of the 95.6% asserted that they did not know anyone who had completed their practical studies building the multi-purpose centres.</p>

	How many multi-purpose centres are there in Mogalakwena?	None = 50 1 = 130 5 = 1 N/A = 48	
	Do you think the community would benefit from having a multi-purpose centre?	Yes = 162 No = 66 N/A = 1	More (70.7%) often than not (28.8%) community members felt that there was great benefit to be gained from having a multi-purpose centre. More especially for benefitting the youth.
Lesedi Early Childhood Development and Business Centre	Do you know Lesedi Early Childhood Development Centre?	Yes = 17 No = 212	Of all the 3 villages, one being where the project was situated, only 7.4% of the people interviewed knew of the project. 92.6% of the respondents did not know where the centre was.
	Since when has it been operating?	1999 = 2 1997 = 1 N/A = 226	
	Have you been to Lesedi Early Childhood Development Centre?	Yes = 5 No = 224	Only 5 (2.2%) out of 229 people have actually been to Lesedi Early Childhood Development Centre. This shows that the

			community is not benefited greatly by the presence of this centre.
School Support & Development Programme	Do you know anyone who received a bursary from Ivan Plats Mine between 2014 and 2018?	Yes = 4 No = 0 N/A = 226	Only 4 people (1.7%) out of 229 knew people who had received a bursary from Ivan Plats to pursue tertiary education.
	Were there Saturday classes between 2014 and 2018 at Ben Hlongwane High School?	Yes = 64 No = 157 N/A = 8	Out of 229 people, 64 people (27.9%) knew and 157 people (68.6%) did not know about there being Saturday classes at Ben Hlongwane High School between 2014 and 2018. While 8 people (3.5%) of people in the communities gave no answer either way.
	Were the Saturday classes attended by students paid for by Ivan Plats Mine?	Yes = 13 No = 163 N/A = 53	163 people (71.2%) were of the impression that students went to school Saturday for their own benefit and 13 out of the 229 people surveyed (5.7%) believed that Ivan Plats had sponsored the Saturday classes. However, 53 (23.1%) people did not know

			anything about there being Saturday classes sponsored by Ivan Plats Mine.
Legae Labana Daycare Centre	Do you know of any day care centre built between 2014 and 2018 for R1 540 625.00?	Yes = 2 No = 227	99.1% of the respondents surveyed did not know of any day care centre built in the area, between 2014 and 2018, for the amount stated in the SLP.
	Do you know about Legae Labana Daycare Centre?	Yes = 13 No = 216	Only 5.7% of the people surveyed knew of Legae Labana Daycare Centre. 94.3% did not know of the day care centre in their community. This speaks to how many community members actually benefit from the presence of the day care centre as well as how aware people are made of projects going on in their community.

	When was it built?	2014 = 2 N/A = 11	Of the 13 people who know of the day care centre, only 2 (15.4%) could guess when the day care centre was built. The other 11 (84.6%) completely did not know when the day care centre was built.
School Support & Development Programme	Have you ever heard of the school development & support programme at Gobela High School?	Yes = 42 No = 187	81.7% of the respondents had never heard of a school development and support programme at Gobela High School, but 18.3% had.
	Was there any infrastructure that was built at Gobela High School between 2014 and 2018?	Yes = 28 No = 186 N/A = 14	Of the 229 people 12.2% agreed that there had been infrastructure built at Gobela High School between 2014 and 2018, whereas 81.2% disagreed and 6.1% did not know whether or not there had been any infrastructure upgraded at Gobela High School.

	Were these projects sponsored by Ivan Plats?	Yes = 22 No = 178 N/A = 29	12.7% did not know whether or not the projects at Gobela High School were sponsored by Ivan Plats Mine. 9.6% agreed that Ivan Plats was behind upgrades to infrastructure and the school development programmes at the High School, while 77.7% of the respondents did not hold the view that Ivan Plats had contributed to the betterment of Gobela High School.
	Have you ever heard of the school development & support programme at Alfred B. Makapane High School?	Yes = 2 No = 223 N/A = 4	97.4% of the people surveyed had never heard of a school development and support programme at Alfred B. Makapane High School.
	Was there any infrastructure that was built at Alfred B. Makapane High School between 2014 and 2018	Yes = 5 No = 203 N/A = 21	88.6% of 229 people disagreed that there had been any infrastructure built at the High School.
	Were these projects sponsored by Ivan Plats?	Yes = 9 No = 172	75.1% of people in the community of Ga-Chaba are of the opinion that Ivan Plats

		N/A = 48	sponsored any projects at Alfred B. Makapane High School.
General Questions	Do you know that communities affected by mining must benefit from the mines around them?	Yes = 146 No = 83	Although 63.8% of people are aware that mining affected communities are supposed to benefit from the mines that they are host to, 36.2% of people surveyed were not aware of the contribution towards development that mines must make to their host communities.
	How do you find out about projects being done by the mine?	Word of mouth = 21 Don't hear anything = 141	Only 9.2% of people in the community get news of projects happening in their community by way of word of mouth, however the rest who answered which amounted to 141 people (61.6%) – do not hear anything at all about the projects going on. Others declined to answer the question when it was posed to them.

	<p>Has Ivan Plats or any other mining company ever called a community meeting to ask what the community needs?</p>	<p>Yes = 23 No = 206</p>	<p>Out of 229 people, 206 (90%) are of the view that mining companies have never called a community meeting to discuss the plans of the mine in their community and to ask community members what their needs are in relation to the development of the Social and Labour Plan. While only 23 people (10%) are of the view that there have been community meetings called by the mines in their communities to discuss what the needs of the community are. Therefore it's either only a select few are being called to these meetings, and they are not meetings inclusive of the entire community, or people are not aware of the meetings being called which means that the meetings are not being widely advertised.</p>
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