

Environmental Authorisation and Waste Management Licence Applications for the Implats Ponds Project in the City of Ekurhuleni Metropolitan Municipality, Gauteng Province

Background Information Document

GDARD reference number: 002/25-26/E0036

DFFE reference number: To be confirmed

May 2025

1. Purpose of the Document

This Background Information Document (BID) aims to provide you with important information regarding:

- ❖ The proposed Implats Ponds Project (“Proposed Project”) for the Impala Platinum Refineries (IPR) in the City of Ekurhuleni Metropolitan Municipality (CoE), Gauteng Province;
- ❖ The Scoping and Environmental Impact Assessments (S&EIAs) and the Public Participation Process (PPP) to be undertaken as part of the Environmental Authorisation (EA) and Waste Management Licence (WML) processes;
- ❖ How you can register as an Interested and Affected Party (I&AP) and be kept informed about the project developments;
- ❖ The public review and comment period for the Draft Scoping Reports (DSRs), Draft Environmental Impact Assessments and Environmental Management Programmes (EIAs/EMPrs)¹ for the WML and EA applications.

Kongiwe Environmental (Pty) Ltd (Kongiwe) has been appointed as the independent Environmental Assessment Practitioner (EAP), tasked with conducting the S&EIA process which is aimed at critically evaluating the potential environmental and social impacts of the Proposed Project.

2. Project Background

Impala Platinum Limited (Implats) intends to construct new PMR effluent storage Ponds, upgrade the existing BMR Pond 1 and to demolish the four existing PMR Ponds at the IPR. The IPR is located approximately 4.5 km northeast of the Springs CBD, in the CoE.

¹ Two separate DSRs and EIA/EMPrs will be compiled to support these individual applications i.e. the WML Application and the EA Application.

Implats is a major producer of platinum, base metals, and other precious metals. It operates several facilities, including the PMR and BMR ponds, which are used to manage plant stormwater and the effluents produced during the refining of platinum group metals (PGMs) such as platinum, palladium, and rhodium, as well as base metals like copper and nickel. IPR is a critical link in the value chain of Implats. The facility produces final products by processing converter matte and purifying the resultant solution streams, which generate specific effluent streams.

The effluent produced during the refining of PGMs is currently contained within four dedicated PMR Ponds that serve as containment and buffer storage facilities. The effluent is processed through two crystalliser plants, where it is dewatered to produce solid disposable waste in the form of a mixture of sodium chloride (NaCl) and sodium sulphate (Na₂SO₄) crystals. The condensate recovered during this process is recycled for further processing. Effluent from the refining of base metals is contained within two BMR ponds and treated in a dedicated water treatment plant to recover clean water, which is then recycled into Implats' processes. The remaining brine from this treatment process is recirculated and stored in the BMR ponds for further management.

Locality

The Proposed Project is situated approximately 4.5 km northeast of the Springs CBD, within Ward 72 in the CoE. The proposed project area is located approximately 0.5 km northwest of Everest township and approximately 1.4 km west of Gugulethu township. The community of East Geduld is 1.07 km west of the IPR, while the community of Petersfield is 1.48 km south of the IPR.

The proposed project activities will take place within Portions 134 and 212 of the farm Geduld 123 IR and both these farm portions are owned by Implats.

The Project area is predominantly surrounded by mining areas, industrial areas, residential areas, railway lines and roads. In addition, there is a river located to the north of the Project area. Figure 1 shows the local orientation of the Proposed Project area.

Proposed Project Activities

The Proposed Project is divided into three components, namely;

1. Upgrade of BMR Pond 1;
2. Construction of four new PMR Ponds; and
3. Demolition of the four existing PMR Ponds after commissioning of the proposed new PMR Ponds.

The four new PMR Ponds will be used to manage effluents from refining precious metals like platinum and palladium. It is proposed to store waste material such as acidic and alkaline solutions and metal byproducts, which will be processed to recover valuable components or neutralise harmful substances before further treatment or disposal.

The proposed area for the new PMR Ponds is a previously disturbed area. A soil assessment has already been completed, identifying and classifying various waste piles, which highlighted the need for rehabilitation. Based on these results, a comprehensive rehabilitation plan has been developed and will be implemented, with soil remediation taking place before construction activities can commence. After the completion of the construction of the four new PMR Ponds, the four existing PMR Ponds will be demolished, and the area will be rehabilitated to light industrial use.

Similarly, the upgraded BMR Pond 1 will be used to store and manage effluents from the refining of base metals like copper and nickel. It will contain waste streams such as acidic and alkaline solutions and sludge before further treatment or disposal. Importantly, rainwater runoff from the BMR will also report to this pond for collection and post treatment.

The construction of the new PMR Ponds, the upgrading of the BMR Pond 1 and the demolition of the existing PMR Ponds will require environmental authorisation in terms of the National Environmental Management Act, 1998 (Act No 107 of 1998) (NEMA) and the National Environmental: Waste Management Act, 2008 (Act No 59 of 2008) (NEM:WA).

The Proposed Project triggers several activities listed under NEMA EIA Listing Notices 1, 2 and 3 (GN R983, GN R984 and GN R985 of December 2014, as amended by GNR 327, GNR 325, and GNR 324 of April 2017, as well as GN R517 of 11 June 2021). These activities require Environmental Authorisation (EA) in compliance with the applicable regulations. A S&EIA will be undertaken to authorise these Listed Activities.

The construction of the new PMR Ponds is classified as a category B activity according to the List of Waste Management Activities (GN R921 of 29 November 2013) published in terms of NEM:WA. Additionally, the upgrading of the BMR Pond 1 and the decommissioning of the existing PMR Ponds is classified as a category A activity. These activities require a WML in compliance with the applicable regulations. A S&EIA process will be undertaken to authorise these Waste Management Activities.

Proposed Infrastructure

The summary of the technical details of the Proposed Project infrastructure is captured below:

Infrastructure	Area (Ha)	Storage capacity (m ³)
BMR Pond 1	1.5	36 000
Four new PMR Ponds	5.6	104 000
Four existing PMR Ponds	3.7	109 037

The following infrastructure will form part of the design of the new and upgraded ponds:

- ❖ Pump stations;
- ❖ Access ramps
- ❖ Silt traps; and

- ❖ Leakage detection sumps.

In addition to the abovementioned infrastructure, pipelines will be constructed for the transportation of effluents from the refinery to the ponds. These pipelines will be approximately 250m – 300m in length and 100mm in diameter.

The following infrastructure will also be utilised on site:

- ❖ Existing access roads;
- ❖ Perimeter walling with security measures; and
- ❖ PMR effluent pipelines and gantries.
- ❖ Existing BMR effluent pipelines and gantries.

Figure 2 shows the four existing PMR Ponds, BMR Pond 1 and the location as well as the layout of the proposed four new PMR Ponds.

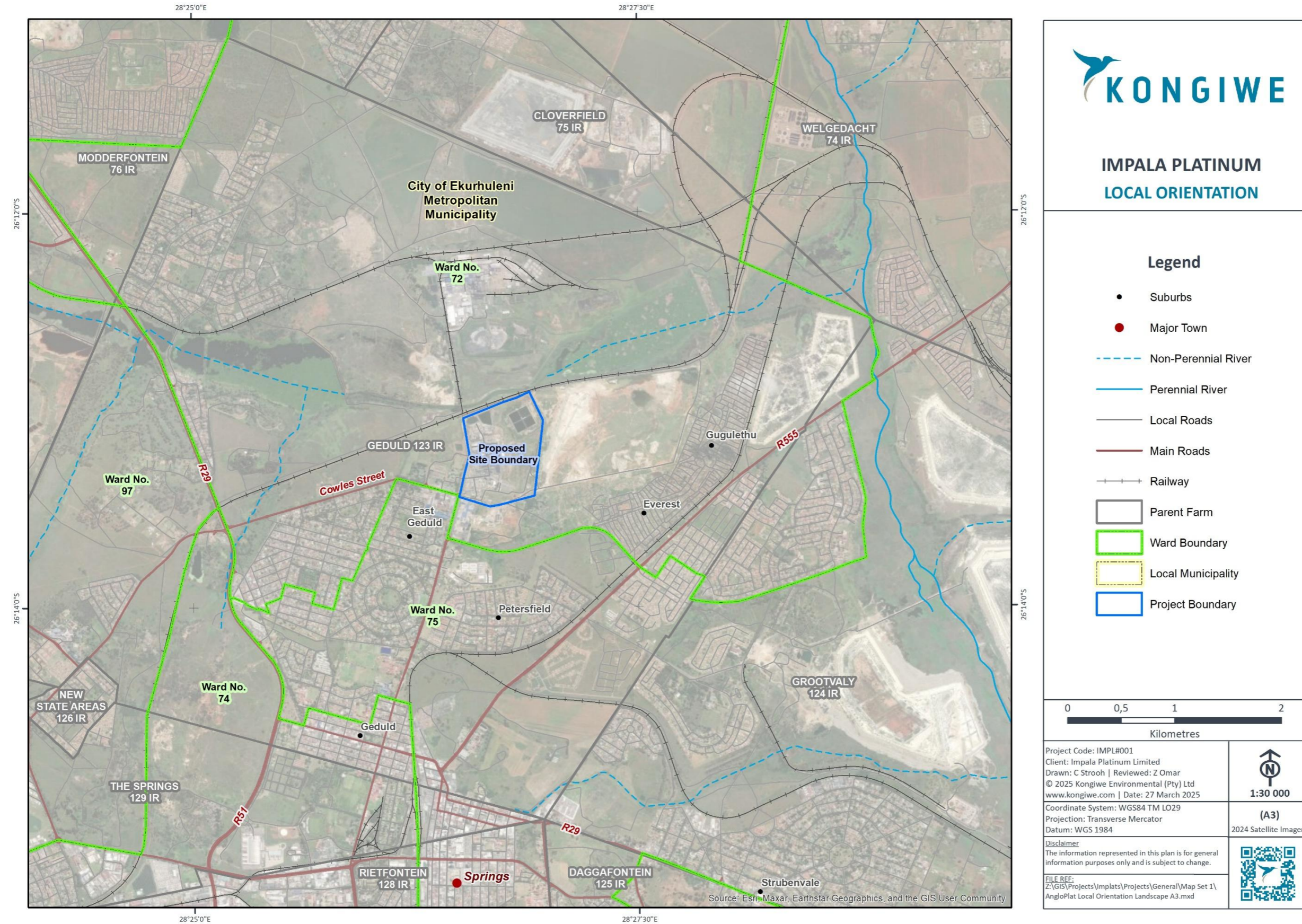
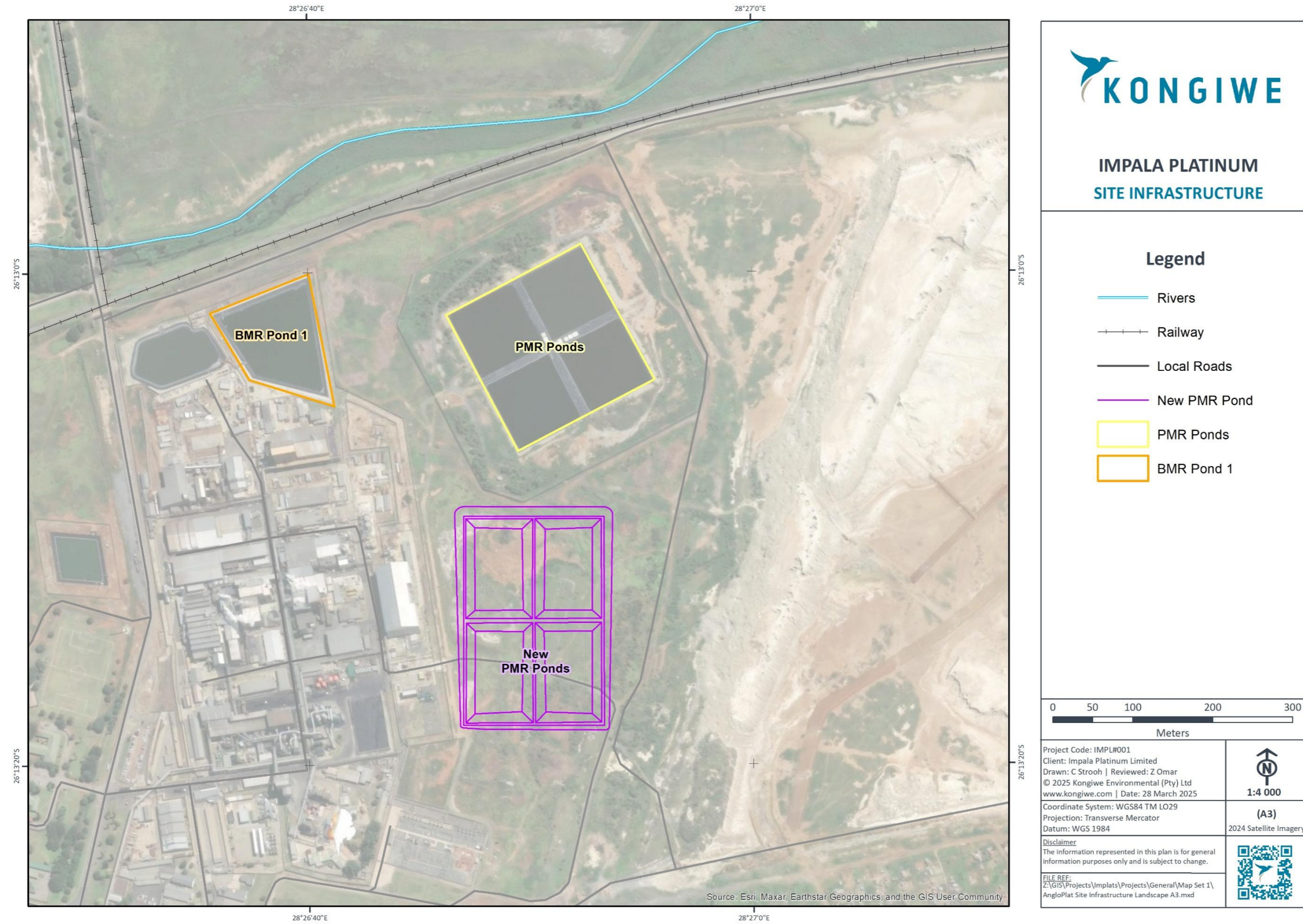


Figure 1: Project Location Map



**IMPALA PLATINUM
 SITE INFRASTRUCTURE**

Legend

- Rivers
- Railway
- Local Roads
- New PMR Pond
- PMR Ponds
- BMR Pond 1



Project Code: IMPL#001 Client: Impala Platinum Limited Drawn: C Strooh Reviewed: Z Omar © 2025 Kongiwe Environmental (Pty) Ltd www.kongiwe.com Date: 28 March 2025	 1:4 000
Coordinate System: WGS84 TM LO29 Projection: Transverse Mercator Datum: WGS 1984	(A3) 2024 Satellite Imagery
Disclaimer The information represented in this plan is for general information purposes only and is subject to change.	
FILE REF: Z:\GIS\Projects\Implats\Projects\General\Map Set 1\ AngloPlat Site Infrastructure Landscape A3.mxd	

Figure 2: Project Infrastructure Map

Access

The major routes around Implats are the R29, located to the west of the IPR, and the R555, located east of the IPR. Access to Implats is via the R29, through Cowles Street, and then through a security-controlled entrance.

Life of Operation

The duration of the project activities is detailed in Table 1 below.

Table 1: Duration of the Project activities

Project Activity	Duration
Upgrade of BMR Pond 1	3 years
Construction of the four new PMR Ponds (including the clearing and rehabilitation of the area before construction)	4 years
Demolition of the existing PMR Ponds	2 years
Operation of the BMR and PMR Ponds	30 years
Rehabilitation at the end of life of the ponds	5 years

Rehabilitation

Rehabilitation of the existing PMR Ponds after demolition, as well as rehabilitation of the New PMR Ponds at the end of life will be undertaken as follows:

- ❖ Project-related infrastructure will be demolished and removed. Implats will address any environmental contamination, revegetation will take place, and the land will be levelled to its original functioning topography levels. Following rehabilitation, the end land use will be light industrial.

3. Legislative Framework

A S&EIA process will be undertaken to evaluate the environmental impacts associated with the Proposed Project as part of the Project's EA and WML applications. The S&EIA process and associated specialist studies to be undertaken will support the application for the required approvals. The following applications will be submitted to the respective Competent Authorities (CAs):

1. **Application for an EA** for listed activities triggered in Listing Notices GN R983, GN R984, and GN R985 published pursuant to the EIA Regulations 2014 (as amended), promulgated in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) will be submitted to the **Gauteng Department of Agriculture and Rural Development (GDARD)**; and

2. **Application for a WML** authorising Category A and Category B waste management activities listed in GN R921 of 29 November 2013, published in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (as amended) (NEM:WA) will be submitted to the **Department of Forestry, Fisheries and the Environment (DFFE)**.

For information, the following application will be made to the Department of Water and Sanitation (DWS):

1. **Water Use Licence Application (IWULA)** in terms of the National Water Act, 1998 (Act No. 36 of 1998) (NWA). This application is being undertaken as a separate process and is being managed by a different consultant, **WSP**.

The EIA findings, including specialist findings, are used by the applicant and authorities to obtain an objective view of the potential environmental, social and cultural impacts that could arise during the Proposed Project. Measures for the avoidance or mitigation of negative impacts will be proposed, and positive impacts will be enhanced.

Scoping and Environmental Impact Assessment Process

In accordance with the provisions of the EIA 2014 Regulations, the S&EIA process for the Proposed Project will be carried out in the following phases:

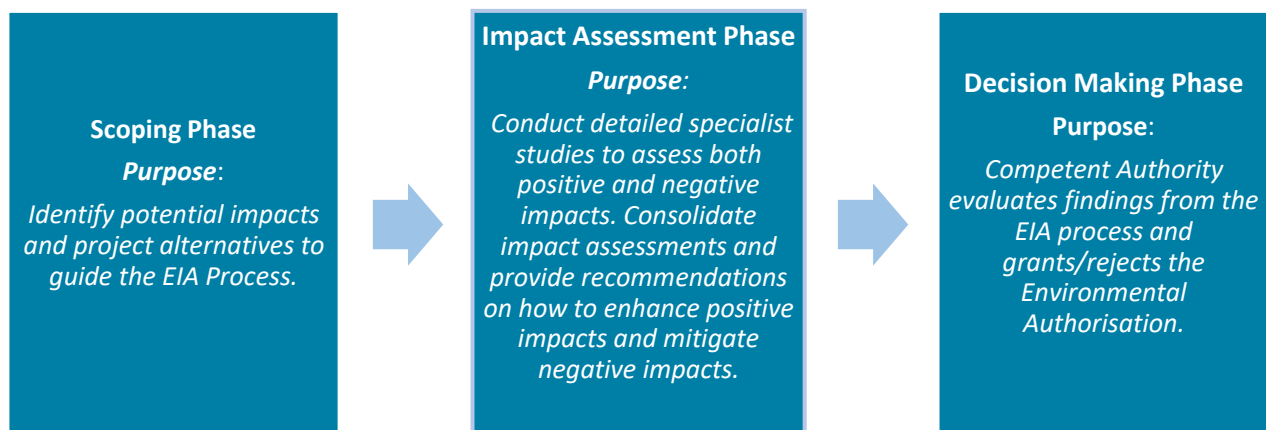


Figure 2: S&EIA process and the associated timeline

Specialist Studies

Various specialist studies will be undertaken as part of the S&EIA process to assess the potential impacts associated with the Proposed Project. Specialist studies being undertaken include:

- ❖ Ecological Assessment;

- ❖ Hydropedology;
- ❖ Heritage Impact Assessment;
- ❖ Surface Water Impact Assessment;
- ❖ Groundwater Impact Assessment; and
- ❖ Contaminated Soil Assessment.

4. Public Participation Process

The Public Participation Process (PPP) will form part of the Integrated S&EIA process. The PPP offers stakeholders a fair opportunity to be informed about the Proposed Project, to raise issues and to make suggestions for enhanced project benefits. The project team will consider relevant issues and suggestions during the S&EIA process. The PPP will take into consideration Section 19 of the Protection of Personal Information Act (POPIA).

POPIA: Safeguarding registered person's personal information

In terms of section 19 of the Protection of Personal Information Act (POPIA), a responsible party must, subject to Sections 9 and 11 of the Act, ensure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical, and organisational measures to prevent loss of, damage to, or unauthorised destruction of personal information, unlawful access to, or processing of personal information. POPIA requires that personal information should be adequately protected to avoid unauthorised access. Therefore, Kongiwe continuously reviews security controls and procedures to ensure that personal information is secured. It should be noted that in terms of Section 11, personal information may be processed to the extent that this is necessary for pursuing the legitimate interests of the responsible party to whom the information is supplied.

Availability of the Scoping Report for Public Review and Comment

The DSRs for the Proposed Project will be made available for public review and comment for a period of **30 days**, from **Wednesday, 21 May 2025 to Friday, 20 June 2025**.

The DSRs will be made available as follows:

- ❖ Electronic copies on Kongiwe's website: <https://kongiwe.com/projects/>
- ❖ Hard copies of the DSRs will be made available at the following public places:
 - Springs Public Library, 55 5th St, Springs New, Springs, 1560
 - Bakerton Public Library, 58 First Ave, Bakerton, Springs, 1559.
- ❖ The non-technical summaries of the DSRs will be distributed electronically to all stakeholders on the database and will be available at the meetings.

You can comment on the DSRs in any of the following ways:

- ❖ By providing comments at the Open Day (please see details below);
- ❖ By writing a letter or sending an email to stakeholders@kongiwe.com; and
- ❖ By contacting our stakeholder engagement team telephonically.

Availability of the EIA/EMPr for Public Review and Comment

During the EIA phase of the Proposed Project, the Draft Environmental Impact Assessments and Draft Environmental Management Programmes (DEIAs/EMPrs), in support of the EA application and as well as the WML application, will be made available for public review for 30 days. All stakeholders who are registered/on the stakeholder database will be notified of the availability of the DEIAs/EMPrs.

Stakeholder Meetings

Stakeholders are invited to participate through online and in-person engagements. Consultation meetings will be held during the public review period using platforms like Microsoft Teams, telephonic discussions, and an Open Day. The purpose of these meetings is to discuss the Proposed Project, contents of the Scoping Reports, and to provide stakeholders with an opportunity to raise their comments and to interact with the project team.

Please see Table 2 below for the proposed stakeholder meeting schedule. Please confirm your attendance of the meeting by registering as an interested and affected party.

Table 2: Proposed dates and methods of public engagement

Proposed dates	Available time slots	Method of Engagement
Online Meetings:		
Wednesday, 11 June 2025	10H00 – 11H00	Microsoft Teams
In-person Meetings: Open Day		
Saturday, 14 June 2025	09H00 – 11H00	Springs Secondary School, 67 Honeysuckle Dr, Bakerton, Springs, 1559

Invitation to be involved as a Stakeholder

Kongiwe Environmental has put measures in place to ensure that all stakeholders are meaningfully consulted by using a wide range of media, documents, and online tools. The proposed methods of engagements for the Proposed Project are planned as follows:

- ❖ Telephonic discussions will be held with key stakeholders to notify them of the Proposed Project and invite them to the stakeholder meetings that will be held throughout the PPP process;
- ❖ Short Message Services (SMSs);
- ❖ Email correspondence:

- Stakeholders with access to email are requested to send their comments/queries via email; and
- Stakeholders can email their Registration and Comment Form.
- ❖ Online engagements:
 - Project information will be timeously uploaded on Kongiwe’s website; and
 - Online Microsoft Teams meetings.
- ❖ In-person Engagements:
 - One-on-One consultation meetings; and
 - Open day.

The purpose of the above-mentioned methods of engagements is to encourage dialogue with stakeholders and provide stakeholders with opportunities to raise their comments/concerns. Minutes from all engagements with stakeholders will be compiled and recorded in the Comments and Responses Report (CRR). Stakeholders are encouraged to indicate their preferred method of engagement to the stakeholder engagement team; please see contact details under Section 5 of this document.

For consultation to be inclusive it is the responsibility of stakeholders to:

- ❖ Register or ensure you are registered as an I&AP;
- ❖ Inform others who you think may be interested and/or affected by the Proposed Project;
- ❖ Ensure comments are submitted within the allowed timeframes to the Kongiwe Stakeholder Engagement office;
- ❖ Contribute information and/or knowledge of the environment;
- ❖ Provide comments on the Proposed Project; and
- ❖ Attend meetings scheduled throughout the process to participate and access information.

5. Comments and Queries

Any person affected by or who may be interested in the Proposed Project is asked to register as an I&AP. Should you have any comments/queries, please contact the Stakeholder Engagement team using the details provided below.

Contact Details:		
Ms Vanessa Viljoen	+27 (10) 140 1725	stakeholders@kongiwe.com
Ms Thuli Phakathi	+27 (10) 140 1726	stakeholders@kongiwe.com

**Our team welcomes your participation and looks forward
to your involvement throughout this process**