

2025 SANDFONTEIN CASE STUDY

“The disconnect between what is promised and what is delivered points to a deeper governance crisis. The audit findings confirm a pattern of Crumb Capture, where mining companies implement symbolic, often dysfunctional projects that lack sustainability, visibility, or community ownership — publicly branded, yet functionally inaccessible and out of sync with community priorities.”



Since its inception in 2012, Mining Affected Communities United in Action (MACUA) has presented a formidable point of opposition against the toxic alliance between mining companies and the government in South Africa.



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BACKGROUND

Sandfontein is a rural community located in South Africa's North West province, under the Moses Kotane Local Municipality in the Bojanala Platinum District Municipality—an area rich in mineral resources and central to the national mining economy.



The village, established in the 1920s, originally drew subsistence farmers and pastoralists seeking fertile land for crops and grazing. Over the decades, Sandfontein has found itself increasingly encircled by the platinum mining sector yet remains structurally excluded from its wealth and benefits.

The area lies near significant deposits of platinum group metals (PGMs)—including platinum, palladium, and rhodium—which are integral to South Africa's strategic role in the global just energy transition. These metals are essential to the manufacture of hydrogen fuel cells and electrolyzers, both of which are central to green hydrogen production, a technology expected to drive decarbonisation and reduce global carbon emissions over the coming decades¹.

As global demand for green energy infrastructure rises, so too does the market value of PGMs, with South Africa positioned as a key exporter due to its rich deposits.



Yet, the reality on the ground in Sandfontein tells a different story—one marked by systemic poverty, underdevelopment, and exclusion. Access to basic services such as water, electricity, education, and health care remains limited. Despite their proximity to economic activity worth billions of rands, many residents depend on subsistence agriculture and government social grants to survive. This disparity highlights a critical fault line in the promise of a just energy transition: while minerals from the region will power the world's green future, the people of Sandfontein are left behind.

The concept of a just energy transition, as defined by the International Labour Organization and reaffirmed by South Africa's Presidential Climate Commission, requires that the shift to a low-carbon economy be inclusive, equitable, and participatory². It must not replicate the injustices of past energy systems that enriched a few at the expense of many. Instead, the transition must guarantee

- 1 [Johnson Matthey \(2023\). Why platinum is crucial to a successful energy transition: six takeaways for policy makers.](#)
- 2 [International Labour Organization \(2015\). Guidelines for a just transition towards environmentally sustainable economies and societies for all.](#) & [Presidential Climate Commission \(2022\). Just Transition Framework for South Africa.](#)

that local communities—especially those hosting critical minerals—benefit meaningfully from mining activity, through decent jobs, local enterprise development, skills transfer, and sustainable infrastructure.

Furthermore, communities must be included in planning and decision-making processes around mineral extraction and energy development, consistent with principles such as Free, Prior, and Informed Consent³.

Without this, the transition risks becoming another extractive regime rather than a transformative one.

The case of Sandfontein reflects broader national challenges around mining governance, regulatory enforcement, and corporate accountability. It illustrates how the green economy can replicate colonial patterns of exploitation unless the rights of communities are placed at the centre of policy and practice.

If South Africa's just transition is to live up to its name, communities like Sandfontein must be recognised not just as resource zones, but as rightful stakeholders in the wealth beneath their feet and the future being built from it.

SIYANDA BAKGATLA NEAR SANDFONTEIN

Siyanda Bakgatla Platinum Mine (SBPM) is located approximately 50 kilometers from the Sandfontein community. In the context of mining operations, community members like those from Sandfontein are designated as “Interested and Affected Parties” (I&APs). This designation includes individuals, organisations, or government departments that are either impacted by or have a stake in mining projects. Given SBPM's proximity and operational impact, Sandfontein residents are rightfully considered I&APs.

OWNERSHIP AND FINANCIAL PERFORMANCE

SBPM is a black-owned mining and processing enterprise specialising in Platinum Group Metals (PGMs), including platinum, palladium, rhodium, and chromium. The company was established following the acquisition of Union Mine from Anglo American Platinum by a joint venture between Siyanda Resources and the Bakgatla-Ba-Kgafela community in February 2018. This strategic partnership aimed to ensure that local communities benefit directly from mining activities in their region⁴.

3 United Nations (2007). [United Nations Declaration on the Rights of Indigenous Peoples \(UNDRIP\)](#).

4 <https://www.siyandaplatinum.com> & <https://www.siyandaplatinum.com/social-labour-plan>



Since the acquisition, SBPM has reportedly exceeded expectations. In 2021, the company more than doubled its revenues, a success attributed to favourable PGM market conditions and various operational initiatives. Specific figures regarding the company's financial turnover and profit margins are not publicly disclosed, making it challenging to assess the full extent of its financial performance.

However, based on available information and reasonable assumptions⁵, we can approximate these figures.

5 Revenue Estimation:

According to Growjo, SBPM's estimated annual revenue is approximately \$197.8 million, with an estimated revenue per employee of \$306,250.

Profit Estimation:

Assuming a profit margin of 10%—a typical figure for mining operations—SBPM's annual profit would be approximately \$19.78 million.

Currency Conversion:

To convert these figures into South African Rand (ZAR), we can use the average USD to ZAR exchange rates for 2021 and 2022:

- **2021 Average Exchange Rate:** 14.7912 ZAR/USD
[Exchange Rates UK](#)
- **2022 Average Exchange Rate:** 16.3742 ZAR/USD
[XE+6Exchange Rates UK+6Most Accurate Exchange Rates+6](#)

Calculating the approximate figures in ZAR:

Revenue:

2021: \$197.8 million × 14.7912 ZAR/USD ≈ R2.93 billion

2022: \$197.8 million × 16.3742 ZAR/USD ≈ R3.24 billion
[Exchange Rates UK](#)

Profit:

2021: \$19.78 million × 14.7912 ZAR/USD ≈ R292.4 million

- o 2022: \$19.78 million × 16.3742 ZAR/USD ≈ R323.9 million

Assumptions:

Profit Margin: 10% is a general estimate; actual profit margins can vary based on operational efficiency, market conditions, and other factors.

Exchange Rates: The average exchange rates for 2021 and 2022 are used for conversion; fluctuations within the year can affect the exact figures.

Based on the available data and assumptions, SBPM's estimated annual revenue is around \$197.8 million, with an approximate annual profit of \$19.78 million. Converted to South African Rand, this equates to revenues between R2.93 billion and R3.24 billion, and profits between R292.4 million and R323.9 million, depending on the exchange rate applied. These figures are indicative and should be interpreted with caution due to the lack of publicly available detailed financial information.

COMMUNITY ENGAGEMENT AND SOCIAL RESPONSIBILITY



SBPM professes a commitment to respecting human rights and being responsive to stakeholder concerns through inclusive engagement. The company asserts that it fosters enduring relationships with affected communities by providing opportunities and developmental benefits aimed at enhancing their capacities both presently and in the future⁶.

Through its Social and Labour Plan (SLP), SBPM claims to have invested over R60 million in host communities. The company claims that this investment aligns with the Integrated Development Plans (IDPs) of the Moses Kotane and Thabazimbi Local Municipalities, as well as the Bakgatla-Ba-Kgafela Tribal Authority Masterplan, addressing critical socio-economic needs.

The SLP projects reportedly focus on infrastructure development, education and skills development, health, poverty alleviation, and enterprise development, with more than 19 projects committed to or underway.

CRITICAL PERSPECTIVE

While SBPM's stated initiatives and investments are commendable on paper, the tangible impact on communities like Sandfontein warrants closer examination. The designation of community members as I&APs implies a right to meaningful participation in decision-making processes that affect their lives. However, the effectiveness of such participation is contingent upon the company's transparency and the genuine inclusion of community voices.

The lack of publicly available detailed financial data raises questions about the extent to which the local community benefits economically from SBPM's operations. Without clear financial disclosures, it's challenging to assess whether the profits generated are equitably shared or reinvested into the community.

⁶ <https://www.siyandaplatinum.com/our-community>

Moreover, while the reported R60 million investments in community projects are significant, the actual implementation and outcomes of these projects should be scrutinised. It's essential to verify whether these initiatives have led to sustainable improvements in living conditions, employment opportunities, and overall community development. The alignment of these projects with the IDPs and Tribal Authority Masterplan is promising, but the real measure of success lies in their execution and the community's perception of their effectiveness.

In conclusion, while SBPM presents a narrative of community investment and development, independent assessments and transparent reporting are crucial to validate these claims. Ensuring that the Sandfontein community, as I&APs, experiences genuine and sustainable benefits from mining operations remains a critical concern that necessitates ongoing attention and accountability.

WHAT IS SOCIAL LABOUR PLAN



A Social and Labour Plan is a document that mining companies are required to submit to the Department of Mineral Petroleum Resources (DMPR), as part of their application for mining rights. It contains commitments made by the company on what it will do for the development of both communities and workers in which it operates.⁷ Also, stipulating how such commitments will be executed in line with the agreed time limits and budget allocations. Section 2(d) of the act 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'.⁸ This emphasises the role of mineral resource extraction and operations as a pivotal means towards community development and women empowerment. SLPs, upon DMPR's approval serves as a legally binding documents that are used to ensure that mineral and petroleum exploration benefit communities.

Section 46(c) of MPRDA 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.⁹ This report is limited to the contents of the LED section of the SLP, and the social audit focused on investigating this section.

⁷ Mineral and Petroleum Resources Development Act 28 of 2002: sec 41 (c).

⁸ 28 of 2002.

⁹ 28 of 2002

UPON APPROVAL BY THE DMPR .

LEGALLY BINDING

SLPs serve as legally binding documents used to ensure benefits flow from mining companies to communities.

VALID FOR 5 YEARS

The SLPs are valid for a period of five (5) years and must be renewed every five (5) year period to ensure continuous benefit for communities such as Magojaneng.

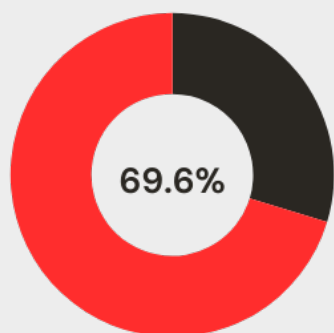
PUBLICLY AVAILABLE

The mining rights holder is obligated to publish the approved SLP on their website, place copies in public areas and make announcements in newspapers and other mediums as to where copies of the approved SLP can be found in English and a language that is predominant in the area.

THREE MEETINGS PER ANNUM

The mining rights holder must convene a minimum of three meetings per annum with mining affected communities & ‘interested and affected persons’, to update stakeholders on progress and developments made with regards to the implementation of the approved SLP.

In principle, SLPs should be drafted in consultation with 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.¹⁰ Despite the comprehensive and progressive laws in place, the reality is that although the SLP system has been in force for over 12 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. Mining companies often neglect to deliver on all the SLP commitments, and the DMPR often does not follow up on these commitments or enforce them, to the detriment of mining-affected communities.



69.6% of Audited Local Development Projects Not Completed by Mining Companies (MACUA Social Audit Report, 2022)

¹⁰ 28 of 2002

WHAT IS 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 communities to claim and realise their constitutional rights to transparent and accountable mining operations.

The Social and Labour Plan (SLP) of a mine's expenditure and service delivery outcomes are assessed during a social audit to see if community perceptions of those outcomes align with the SLP's implementation vision. By contrasting the claimed results with the actual experiences of people on the ground, community members collectively take part in the process of validating an SLP of a specific mine. The host community uses the evidence gathered during a social audit as a means of advocacy and reports it to the relevant parties at a public meeting. Community testimony, expertise, and experiences are legitimate and essential components of this evidence. A social audit enables poor and working-class populations to interact with a mining process that affects their lives, resulting in more effective and meaningful engagement.

“Without regular audits, penalties for non-compliance, and enforcement of Free, Prior and Informed Consent (FPIC) principles, the MPRDA becomes hollow legislation—an unused shield in the hands of the vulnerable.

Social audits further empower communities, deepening the culture of participatory democracy and public deliberations. It provides an opportunity for poor mining communities to be heard, and a platform for people who have been excluded, deceived, and deprived of benefits and opportunities.

The importance of conducting social audit is to establish whether mining companies are contributing towards the sustainability of the host communities through implementation of SLP's. It is also to capacitate community members on SLP processes and procedures so that they are able assess the extent of SLP compliance, ensure reliable information is available for all stakeholders involved, monitor and challenge mining companies whenever it is failing to comply with the law.

METHODOLOGY

In pursuit of a more just, transparent, and accountable mining sector, MACUA (Mining Affected Communities United in Action), WAMUA (Women Affected by Mining United in Action), and YAMUA (Youth Affected by Mining United in Action) branches in Sandfontein undertook a community-led social audit of the Siyanda Bakgatla Platinum Mine's Social and Labour Plan (SLP) for the 2016–2020 period.

This initiative reflects a growing movement by mining-affected communities to assert their rights and actively monitor corporate and state obligations within the broader context of a just energy transition.

The social audit was conducted over a four-day period from 26 to 29 August 2023, followed by an on-site physical verification on 13 November 2023. The audit was strategically designed to evaluate whether the promises made by Siyanda Bakgatla under its SLP had been fulfilled in practice, particularly as these promises relate to local economic development, skills transfer, and equitable participation in the green economy.

The community elected to focus on three specific projects listed in the mine's SLP:

- ▶ Upgrade of Dinkwe Primary School
- ▶ Upgrade of Okomelang Primary School
- ▶ Expansion of the Sedimogang Poultry Project

However, due to logistical constraints and the unavailability of relevant stakeholders, the audit team was only able to complete a full physical verification of one project—the Sedimogang Poultry Project, located in Sandfontein.

Dinkwe Primary School



Okomelang Primary school



Sedimogang poultry project



To guide the inquiry, the audit team collectively developed a detailed questionnaire structured around key indicators of project existence, quality, visibility, and community impact. These questions were designed to assess not only whether projects were implemented but also whether they were meaningful, inclusive, and aligned with community needs—especially in a context where mining profits from just transition-critical minerals like platinum are likely to surge.

The survey also probed deeper systemic issues, including:

- ▶ The exclusion of women in community decision-making and mining benefits,
- ▶ Access to job opportunities and skills development, and
- ▶ The level of community consultation in the development and implementation of the SLP.

Door-to-door interviews were conducted with residents across Sandfontein, ensuring a diverse and inclusive data set. Once the data was collected, it was systematically captured, standardised, and analysed to identify common themes, patterns, and outliers.

The preliminary findings were then presented back to the community in a feedback session, reinforcing the principle that affected communities must be both subjects and authors of the accountability process.

This report synthesises the findings of that audit. It represents not just a set of responses, but a collective voice of a community grappling with marginalisation in the shadow of mineral wealth—a community that, despite being on the frontlines of the green energy future, remains excluded from its benefits.

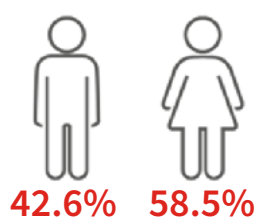
Through this audit, the Sandfontein community reaffirms its right to transparency, inclusion, and genuine development in the name of a truly just transition.



“when enforcement fails, social audits become essential tools of accountability—yet they should not replace the state’s responsibility to act.”

DEMOGRAPHICS

The socio-economic landscape of Sandfontein, despite its proximity to one of South Africa's largest Platinum Group Metals (PGM) mines, is marked by significant challenges, as revealed through a community-led social audit.



SURVEY PARTICIPATION AND DEMOGRAPHICS

Out of 132 community members surveyed, 123 provided valid responses, comprising 72 females (58.54%) and 51 males (41.46%).

HOUSEHOLD INCOME AND ECONOMIC CONDITIONS

A substantial portion of respondents (32.5%) reported monthly household incomes between R1,000 and R2,000, while the second-largest group subsisted on R0 to R500 per month. Notably, only 5.6% of households earned above R4,000 monthly, which is below the national minimum wage. As of March 2023, South Africa's minimum wage was set at R25.42 per hour, equating to approximately R4,182.61 per month for a 38-hour workweek and R4,953.09 for a 45-hour workweek¹¹.



5.6%
Earn above
R4000
monthly

DEPENDENCE ON SOCIAL GRANTS

The community exhibits a heavy reliance on social assistance, with 50.41% of respondents receiving social grants. These grants range from R500 to R2,200, depending on the type. On average, respondents support two children, with 82.93% indicating they have dependents. Some households reported having up to 12 dependents, exacerbating financial strains.

¹¹ <https://www.fasken.com/en/knowledge/2023/02/wage-thresholds-and-the-national-minimum-wage-for-2023>

EMPLOYMENT AND EDUCATION LEVELS

Employment opportunities are scarce, with only 26.02% of respondents reporting being employed; none specified employment with the local mine. Educational attainment is relatively high, with 69.11% having completed secondary education and 27.64% pursuing tertiary education. Despite this, upward mobility remains limited, reflecting in the community's economic hardships.

HOUSEHOLD COMPOSITION

Household sizes vary, averaging four individuals, with the largest comprising 18 members and the smallest a single occupant. On average, at least two women reside in each household, highlighting the potential impact of socio-economic challenges on women in the community.



88%
Never worked
in nearby
mine.

UNEMPLOYMENT AND MINING INDUSTRY RELATIONS

Unemployment is a pressing issue, with 87.74% of respondents never having worked in the nearby mine and only 14.63% having had such opportunities. Concerns about the mine's recruitment policies were raised by 42.28% of participants, citing issues like bribery, age restrictions, nepotism, preference for experienced workers, and solicitation of sexual favours. These practices hinder community members' access to employment and suggest deficiencies in the mine's adherence to fair labour practices and its Social and Labour Plan (SLP) commitments.



IMPLICATIONS FOR SUSTAINABLE DEVELOPMENT

The data underscores the disconnect between the mining industry's economic benefits and the socio-economic upliftment of adjacent communities like Sandfontein. Despite the mine's obligations under its SLP to contribute to sustainable community development and skills enhancement, tangible improvements remain elusive.

Addressing these disparities is crucial to ensure that the wealth generated by natural resources translates into meaningful development for host communities.

CONSULTATION

The Social and Labour Plan (SLP) is a legally binding instrument designed to ensure that mining contributes to local development, promotes inclusive employment, and addresses historical inequalities.

Under the Mineral and Petroleum Resources Development Act (MPRDA) and its regulations, mining companies are obligated to consult meaningfully with affected communities during the formulation and implementation of their SLPs.

These consultations must be transparent, inclusive, and frequent, enabling communities to influence the developmental priorities funded by mining operations on or near their land.

However, the findings from the social audit conducted by MACUA and WAMUA reveal a troubling disconnect between these legal obligations and the reality on the ground in Sandfontein.

LACK OF AWARENESS AND INFORMATION

When asked about their knowledge of SLPs, 82.11% of respondents indicated that they had never heard of the term. Only 11.38% claimed some familiarity, though their explanations reflected deep misconceptions, with one respondent inaccurately describing the SLP as “those labour related laws that are basically standing for workers’ unity.”

82%

82% had **never heard** of an SLP

11%

11% of respondents claimed **some familiarity**, though their explanations reflected deep misconceptions

Several others who claimed to know about SLPs skipped the follow-up explanation, casting doubt on their understanding. This suggests that SLP-related information is either not being disseminated at all, or it is being presented in inaccessible or overly technical formats.

This knowledge gap is not merely a failure of communication—it is a structural obstacle to accountability. Without knowing what an SLP is, what it promises, or how to monitor it, community members are effectively disempowered from claiming rights or holding the mine accountable.

FAILURE TO ENGAGE THE COMMUNITY

An overwhelming 98.37% of community members surveyed reported never being invited to a single consultation by Siyanda Bakgatla Platinum Mine regarding its SLP. This is in direct violation of the MPRDA Regulations, which require mining right holders to convene at least three meetings per year with affected communities and I&APs (Interested and Affected Parties) to discuss SLP implementation and progress.

Furthermore, 76.42% of respondents were unaware of the mine's commitment to expand the Sedimogang Poultry Project, a project explicitly listed in the SLP. If communities are not informed about the existence of projects intended to benefit them, they cannot monitor implementation, demand transparency, or intervene when commitments are not met.

98%	98% of community members surveyed had never been invited to a consultation regarding its Social and Labour Plan (SLP).	76%	76% were not no aware of the mine's commitment to the Poultry Project.
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EXCLUSION FROM DECISION-MAKING

The right to meaningful consultation is a cornerstone of both national mining law and international human rights standards. Principles of Free, Prior, and Informed Consent (FPIC)—enshrined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)—require that affected communities:

- ▶ Be free from coercion or manipulation during consultations;
- ▶ Be consulted prior to the commencement of any development on their land;
- ▶ Be informed in a clear, accessible, and comprehensive manner about the impacts of proposed projects; and
- ▶ Be empowered to give or withhold their consent.

These principles, though most directly linked to indigenous rights, offer an important framework for interpreting the participatory rights of mining-affected communities more broadly—especially in a country like South Africa, where rural and tribal communities continue to suffer from the legacy of dispossession and exclusion.

IMPLICATIONS FOR A JUST ENERGY TRANSITION

The community's exclusion from SLP development and oversight reflects deeper issues in South Africa's mining governance—issues that are especially urgent as the country positions itself as a critical supplier of platinum for the global green economy.

A just energy transition cannot be realised if the communities who live on top of the minerals fuelling that transition are denied a say in how their resources are used and how the benefits are distributed.

Consultation must be more than a tick-box exercise. It must involve genuine dialogue, accessible information, and shared decision-making power. Without this, the promise of a just transition risks becoming yet another form of extractive injustice—where profits are privatised, and burdens are socialised.

“exposes the deep disconnect between SLP commitments made on paper and the lived realities of implementation on the ground.”





FINDINGS ON THE EXPANSION OF SEDIMOGANG POULTRY PROJECT

PROJECT 1: EXPANSION OF THE SEDIMOGANG POULTRY PROJECT

MINING PROJECT PARTNERS	TIMEFRAME	BUDGET	COMMUNITY AWARENESS
Siyanda Bakgatla Platinum Mine (SBPM)	2016-2020	R2 Million	⊗24%

Social and Labour Plans (SLPs) are not aspirational documents—they are legal obligations intended to ensure that mining companies contribute meaningfully to local economic development, particularly in communities affected by their operations. Within this framework, Local Economic Development (LED) projects are positioned as strategic tools to address poverty, unemployment, gender inequality, and underdevelopment by directly benefitting women, youth, and other marginalised groups.

Yet, the experience of the Sedimogang Poultry Project in Sandfontein exposes the deep disconnect between SLP commitments made on paper and the lived realities of implementation on the ground.

COMMITMENTS MADE, COMMUNITIES IGNORED

As part of its 2016–2020 SLP, Siyanda Bakgatla Platinum Mine (SBPM) committed to upgrading and expanding the Sedimogang Poultry Project. The project’s stated aims were ambitious and socially valuable: to alleviate poverty, create jobs, empower women and youth, and foster long-term economic development in Sandfontein.

A budget of R2 million was allocated, with completion scheduled for 2018 and an “exit strategy” to transfer the project to local farmers through an integrated support programme.

On paper, this sounded like a transformative intervention. But what the social audit team found in practice was a shell of a promise.

When MACUA and WAMUA visited the project site in November 2023, they met the two elderly women who founded and manage Sedimogang. They were shocked to learn that their enterprise had been listed in the SLP, let alone budgeted for R2 million in support.

They had no knowledge of the SLP, had never been meaningfully consulted, and had only been told—without further details—that SBPM would “build infrastructure and deliver chickens.”

This lack of consultation violates the MPRDA’s legal framework, which requires that SLP projects be designed in partnership with affected communities. It also contravenes basic principles of participatory development, transparency, and informed consent.



DISCREPANCIES BETWEEN REPORTING AND REALITY

SBPM's 2020–2021 Integrated Report lists the Sedimogang Poultry Project as “completed,” including the final delivery of livestock. However, on the ground, no chickens had been delivered by November 2023—more than two years after the supposed completion. The poultry infrastructure built by the mine exists, but its value is limited without livestock or operational funding.

Even more troubling, the project's owners stated they had been using their pension funds to sustain operations. Unable to afford salaries, they carry out all the physical work themselves. Despite the project's stated objectives, they have not created jobs, not alleviated poverty, and not received any capacity-building support from the mine or the state.

Their efforts to seek clarification or support from SBPM have reportedly been met with silence or disregard, further compounding their sense of exclusion and abandonment.

COMMUNITY IMPACT: DISILLUSIONMENT AND EXCLUSION

The wider community is equally uninformed. 76.42% of survey respondents were unaware that SBPM had committed to supporting Sedimogang. Moreover, 65.85% reported that they had never benefitted from the project, nor knew anyone who had. These statistics highlight a total failure of information sharing, consultation, and monitoring.

This is not a case of underperformance—it is a clear dereliction of duty on the part of SBPM and a failure of regulatory enforcement by the Department of Mineral and Petroleum Resources (DMPR).

It also calls into question the integrity of corporate reporting when physical evidence and community testimony so dramatically contradict what is recorded in official documents.

Social audit team meeting with Sedimogang Poultry farm





GENDER, POVERTY, AND THE FALSE PROMISE OF EMPOWERMENT

That the two project owners are elderly women, surviving on state pensions and unassisted by the mine, speaks volumes. SLPs are supposed to redress systemic gender inequalities in the mining sector, yet in this case, women are once again left doing the heavy lifting—literally and figuratively—without recognition, remuneration, or support.

This outcome not only violates the spirit of the SLP framework but also undermines South Africa's broader commitments to gender justice, rural development, and a just transition. If the move toward a greener and more inclusive economy is to have any credibility, the inclusion of rural women at the margins of mining economies must be real—not rhetorical.

REGULATORY INACTION: A SYSTEMIC FAILURE

Finally, the failure of the DMPR to monitor this project or act on its discrepancies is itself a breach of public trust. The Department's oversight obligations are clear, and the consequences of inaction are severe: unaccountable mining practices, disempowered communities, and growing inequality in places that should be at the forefront of inclusive development.

This case demonstrates that when enforcement fails, social audits become essential tools of accountability—yet they should not replace the state's responsibility to act.





*Inside chicken hen house built by
Siyanda Bakgatla.*

EXCLUSION OF WOMEN

Despite being fundamental to the social and economic fabric of mining-affected communities, women remain systemically marginalised in both direct and indirect aspects of the mining industry. This exclusion not only reinforces gender inequality but also contradicts the stated objectives of South Africa's mining laws, which commit to inclusive development and equitable participation.

Nowhere is this more visible than in Sandfontein, where survey results revealed that 90.24% of respondents had never seen women invited to any SLP consultations conducted by Siyanda Bakgatla Platinum Mine (SBPM). This is not a procedural oversight—it is a denial of voice, agency, and power to half of the community.

INVISIBLE LABOUR, VISIBLE INEQUALITY

The functioning of mining communities often depends on the unpaid and unrecognised labour of women. From maintaining households, caring for children, and supporting elderly relatives, to sustaining the emotional and physical well-being of mineworkers, women's contributions are fundamental. These roles form part of what is often called "social reproductive labour"—the work that keeps societies functioning yet remains uncompensated and undervalued.

Despite this, women are excluded from economic opportunities, decision-making forums, and community development programmes funded through SLPs. This contradiction lays bare the gendered exploitation that defines much of the mining sector.



BARRIERS TO EMPLOYMENT AND SKILLS DEVELOPMENT

The social audit found that 43.09% of community members believe it is more difficult for women to find jobs at the mine. This perception is rooted in real, documented barriers, including:

- ▶ Stereotypes that women are unsuited for mining work
- ▶ Discriminatory hiring practices
- ▶ Lack of targeted training or reskilling for women
- ▶ A male-dominated work culture that excludes women from networking and mentorship opportunities

These dynamics reinforce a broader pattern in South Africa's mining industry, where women comprise only 12% of the mining workforce despite forming nearly 51% of the population¹².

As a result, women in Sandfontein are often forced into economic dependence on male partners, limiting their autonomy and participation in community life, and further entrenching gender-based economic disparities.

GENDER-BASED EXPLOITATION AND HARASSMENT

More alarmingly, 10.57% of respondents reported that women are coerced into providing sexual favours or paying bribes to secure employment at the mine. These allegations raise serious ethical and legal concerns and point to a toxic and dangerous work culture.

In such an environment:

- ▶ Women who resist exploitation are excluded
- ▶ Those who speak out risk retaliation or reputational harm
- ▶ Workplaces become sites of harassment and violence rather than empowerment

These conditions violate not only domestic law—such as the Employment Equity Act and the Mining Charter—but also international human rights standards, including the UN Guiding Principles on Business and Human Rights.

This is a crisis of gender-based violence and exploitation that cannot be separated from the broader conversation on mining and the just transition. No transition is just if it replicates or intensifies the inequalities of the past.

¹² Department of Mineral Resources and Energy (DMRE). (2022). *Mining Charter Implementation Report*. & Statistics South Africa (StatsSA). (2023). *Gender Series: Women Empowerment in South Africa*.



TOWARD GENDER-RESPONSIVE MINING GOVERNANCE

What is urgently needed is a systemic overhaul of how women are included—or excluded—in mining governance. This includes:

- ▶ Mandating gender representation in all community consultation and SLP decision-making processes;
- ▶ Developing independent grievance mechanisms for women who face abuse or exploitation;
- ▶ Funding gender-responsive training, employment, and enterprise development;
- ▶ Establishing safe working environments for women within and around mining operations;
- ▶ Integrating gender indicators into SLP performance assessments and DMPR compliance reviews.

Additionally, corporate and state actors must go beyond compliance and actively work to dismantle patriarchal norms and power structures that silence women and deny them access to opportunity.

The Sandfontein case is not isolated. It is reflective of a broader pattern of gendered exclusion in South Africa's mining towns—a pattern that will persist unless the voices and needs of women are placed at the centre of both mining operations and community development strategies.

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Accusations of bribery, nepotism, sexual coercion, and exclusionary hiring practices point to a recruitment system that is not just broken, but exploitative.



CONCLUSION: THE PERSISTENCE OF INEQUALITY AMID LEGAL PROMISES & CORPORATE PROFITS

Despite the existence of a detailed and progressive regulatory framework—chiefly the Mineral and Petroleum Resources Development Act (MPRDA) and the Social and Labour Plan (SLP) system—mining-affected communities like Sandfontein remain trapped in poverty, unemployment, and exclusion.

More than 12 years since SLPs became a legal requirement, the structural conditions on the ground have barely shifted. In fact, they reveal the widening gap between promises made by mining corporations and the lived realities of the communities whose land, labour, and livelihoods sustain those operations.

The evidence gathered in this social audit makes clear that Siyanda Bakgatla Platinum Mine (SBPM) has failed to meet its SLP obligations in any meaningful or measurable way. This failure is twofold: first, in the lack of

meaningful consultation, which denies the Sandfontein community the opportunity to shape projects meant to benefit them; and second, in the failure to implement SLP commitments transparently and effectively, as illustrated by the Sedimogang Poultry Project and the mine's skewed recruitment practices.

These failures have real-world consequences. Unemployment remains endemic, with only a small minority of community members having ever worked at the mine. Accusations of bribery, nepotism, sexual coercion, and exclusionary hiring practices point to a recruitment system that is not just broken, but exploitative. Opportunities for economic advancement are therefore blocked not by a lack of will or talent in the community, but by a systemic denial of access and fairness.

THE STATE'S DERELICTION OF DUTY

The Department of Mineral and Petroleum Resources (DMPR), which is tasked with enforcing compliance and protecting community interests, has similarly failed in its role. The department's apparent absence in monitoring, follow-up, or enforcement enables companies like SBPM to treat SLPs as public relations tools rather than binding development contracts. Without regular audits, penalties for non-compliance, and enforcement of Free, Prior and Informed Consent (FPIC) principles, the MPRDA becomes hollow legislation—an unused shield in the hands of the vulnerable.





GENDERED EXCLUSION AND STRUCTURAL VIOLENCE

The marginalisation of women in Sandfontein is particularly pronounced and deeply troubling. While women provide essential social reproductive labour that sustains mining households, they are excluded from consultations, denied fair access to jobs, and in some cases, subjected to sexual coercion and harassment in exchange for employment.

These findings reveal a toxic masculine culture embedded in the mining industry—one that perpetuates gender-based violence, deepens economic dependency, and erodes women’s right to dignity, safety, and full citizenship.

Addressing these injustices requires more than isolated interventions; it demands a structural transformation of the mining sector to include gender equity as a central pillar of social and economic justice.

SOCIAL AUDITS AS TOOLS OF ACCOUNTABILITY AND RESISTANCE

The social audit process has proven indispensable—not only in exposing failures but in empowering communities to understand their rights, demand transparency, and challenge exclusion. Where the state has failed to act and corporations have failed to deliver, community-led processes have stepped into the void to document, verify, and expose the truth.

But social audits, while vital, cannot replace the legal and moral responsibility of the state and corporate actors to uphold justice, equity, and development.

A CALL TO ACTION: TOWARD A JUST TRANSITION

As South Africa positions itself as a key player in the global green economy, powered by platinum and other critical minerals, the idea of a “just transition” must be more than a slogan. It must mean that mining-affected communities like Sandfontein share in the benefits of resource wealth—not only through jobs, infrastructure, and enterprise development but through dignity, inclusion, and a right to shape their own future.



A just transition demands:

- ▶ Full transparency and enforcement of SLP commitments;
- ▶ Participatory planning with real influence for affected communities;
- ▶ Gender-responsive governance and safe work environments;
- ▶ Independent monitoring and accountability mechanisms led by civil society and supported by law.

Until these pillars are realised, mining will continue to deepen inequality rather than dismantle it.

**SLP PROJECT AUDIT MATRIX – SIYANDA BAKGATLA PLATINUM MINE
(SANDFONTEIN SOCIAL AUDIT)**

CLAIMED SLP COMMITMENT	DEVELOPMENT POTENTIAL	STATUS	CLAIMED VALUE (R)	ACTUAL VALUE ACCRUED	COMPLETION SCORE (%)	COMMUNITY VALUE SCORE (%)
Upgrade infrastructure Deliver chickens Empower women/youth Support economic development	HIGH Enterprise Development Women Empowerment Poverty Alleviation)	PARTIALLY COMPLETED Infrastructure built, no chickens delivered, no operational support	2Million	LOW Infrastructure delivered but no operational support, zero job creation, high community disillusionment	45	28
TOTAL / AVERAGE		45/100			45%	28%

Total Completion Score: 45 / 100

Average Completion Score: 45.0%

Average Community Value Score: 28.0%

