

2025

KROONDAL

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.

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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



This report delineates the findings gathered from a social audit conducted in the mining community Ikemeleng. Ikemeleng is an informal settlement located near Kroondal, in the Rustenburg Local Municipality of South Africa's Northwest Province. The settlement started as a farm in the 1960s, however mining only started in the area in the 1990s.¹ As mining operations expanded in the late 20th century, particularly with the discovery of platinum deposits, more people migrated to Ikemeleng seeking employment opportunities in the mines. The need for housing as a result of mining activities, caused the settlement to grow significantly. This influx led to rapid growth in the population of the settlement, which is now home to thousands of residents living under informal conditions without formal housing or basic services.²

The settlement has grown significantly, attracting workers from various parts of Africa seeking employment in the mining sector. However, this growth has been marked by severe social and economic challenges. The community lacks basic municipal services, including proper roads, water supply, and sanitation facilities. The living conditions are characterised by overcrowding, poor housing, and inadequate access to healthcare and education.

► ENVIRONMENTAL IMPACTS

The environmental consequences of mining activities in Ikemeleng are dire. The community is surrounded by several mining operations, including those of Sibanye Stillwater, Xstrata, and Samacor, all of which contribute to high levels of dust and atmospheric pollution. This has a devastating impact on the residents' respiratory health, particularly during windy seasons when dust levels become unbearable.

The tailings dams from these mines are a significant source of environmental hazard. For instance, the tailings dam from Xstrata is located directly in front of the Ikemeleng primary school and clinic, while the Sibanye tailings dam is near new residential stands. These dams pose a risk of toxic water contamination, which can flow into the community's homes and damage property. The lack of proper waste management exacerbates this issue, with dumpsites near the community contributing to further environmental degradation and health risks.

1 Tunatazama, 2012 'Ikemeleng' Available at <https://communitymonitors.net/wp-content/uploads/2012/07/Ikemeleng-Report.pdf>, accessed 21 October 2024 at 29.

2 South African Human Rights Commission (2020). National Hearing on the Underlying Socio-economic Challenges of Mining-affected Communities in South Africa.

► HEALTH AND WELL-BEING

The health of the Ikemeleng community is severely compromised due to the mining activities. The high levels of dust and toxic water contamination lead to respiratory diseases and other health issues. The community also faces challenges related to poor sanitation, with shared and inadequately maintained toilets and community taps that often leak and flood the streets. These conditions create an environment conducive to the spread of diseases, particularly among children³.

► ECONOMIC AND SOCIAL INEQUITIES

Despite the presence of multiple mining companies, the economic benefits of these operations do not trickle down to the community. The miners themselves face poor working and living conditions, with low wages that prevent them from affording better housing or improving their socio-economic status. The community remains in a state of abject poverty, with issues such as unemployment, substance abuse, HIV/AIDS, and underage pregnancy prevalent.⁴

► COMMUNITY ENGAGEMENT AND HUMAN RIGHTS

The engagement between the mining companies and the Ikemeleng community is woefully inadequate. Community members are often excluded from decision-making processes that directly impact their lives. The lack of meaningful engagement and the failure to address community concerns have led to a sense of disillusionment and mistrust. Human rights, including the right to a healthy environment, clean water, and decent living conditions, are consistently violated⁵.

► GLENCORE WATERVAL MINE AND ITS IMPACTS

Glencore's Waterval mine, part of the Kroondal mining operations, is no exception to the broader issues faced by the Ikemeleng community. While Glencore has undertaken some risk assessments and emergency preparedness and response plans (EPRP) for its tailing's storage facility, the overall impact on the community remains significant. The EPRP, though a step in the right direction, does not address the fundamental issues of environmental degradation, health risks, and social inequities faced by the community⁶.

- 3 Motene, O. Priority issues in Ikemeleng Informal Settlement (2018) Community Alerts. Available at: <https://communitymonitors.net/2018/08/priority-issues-in-ikemeleng-informal-settlement/> (Accessed on 01 December 2024).
- 4 The Southern African Community Monitors. The Southern African Community Monitors. Available at: <https://vuka.news/location/northwest/the-southern-african-community-monitors/> (Accessed on 01 December 2024).
- 5 *Building safe habitats for the Ikemeleng Miners* (2020) Competition brief - AWS Available at <https://competitions-uni.s3.amazonaws.com/0/221/Download/team212020-08-14T10-40-000000.pdf> Accessed on 01 December 2024
- 6 [PDF] Kroondal Mine Tailings Storage Facility - Glencore <https://www.glencore.com/.rest/api/v1/documents/static/af09b93c-796c-40c4-971a-f0b36f4aeaf2/GISTM-disclosure-2024-Kroondal-Mine.pdf> Accessed on 01 December 2024.

Recognising the challenges faced by informal settlements like Ikemeleng, local authorities and mining companies have initiated efforts to formalise these areas. In 2004, plans were put in place to upgrade infrastructure and improve living conditions in Ikemeleng community. These initiatives aim to integrate the community into the Rustenburg Local Municipality's planning framework, allowing for better access to services and support.⁷ Community engagement has been a critical component of these formalisation efforts. While some community leaders and residents are claimed to be involved in discussions regarding their needs and priorities, there remains a significant gap between community expectations and what is delivered by government and mining entities.⁸

The settlement remains informal in its nature despite the expectations created by government and mining companies. Residents do not have legal land tenure, lacking access to basic services such as water, sanitation, electricity, and waste management.⁹

GLENCORE WATERVAL MINE IN KROONDAL

Glencore Waterval Mine is comprised of both the Waterval-East and Waterval-West complexes of the mine's holdings, and is primarily focused on extracting chrome as well as platinum group metals (PGMs), including platinum, palladium, and rhodium- metals vital to various industrial applications.¹⁰

The mine was placed under care and maintenance in 2019 and currently employs 14 employees and 35 contractors.¹¹

This does not mean that the mine closed operations, according to their draft scoping report as well as the report submitted by the Department of Mineral and Petroleum Resources and Energy to Parliament(2022), the mine was due to continue operations at its UG1 opencast project to ensure that Glencore's Waterval Mine Waterval West plant continues operations in order to retain

7 Kroondal Platinum Mine Social & Labour Plan (2011-2016)

8 Ibid at *Building safe habitats for the Ikemeleng Miners* (2020) Competition brief

9 UFS Research Report (2017). An Appropriate Management Strategy for Informal Settlements in Mining Areas

10 Alta van Dyk Environmental, (2022), 'Glencore Operations South Africa (Pty) Ltd Waterval Mine Draft Scoping Report', https://www.shangoni.co.za/wp-content/uploads/GLE-WAT-14-08-27_EMPr_Draft-for-comment_compressed.pdf, accessed on 24 October 2024 at 1.

11 Department of Mineral Resources and Energy, (2022), 'Presentation to the Portfolio Committee on Mineral Resources and Energy on Glencore Operations in South Africa', https://pmg.org.za/files/221101Glencore_Operations_Presentation_01_November_2022.pptx#:~:text=WATERVAL%20MINE&text=The%20mine%20employs%2014%20employees,develop%20new%20opencast%20for%20UG1, accessed on 24 October 2024.

jobs for those employees who are reliant on the company for their income.¹² In this way the mine would be able to continue to promote economic growth within the Rustenburg Local Municipality, as mines are reported to contribute approximately 50% of all formal employment within the Rustenburg Local Municipality.¹³

► SHAREHOLDING AND FINANCIAL PERFORMANCE

Glencore plc, the parent company of Glencore Operations South Africa (Pty) Ltd, is a multinational commodity trading and mining company headquartered in Baar, Switzerland. As of 2023, major shareholders included Ivan Glasenberg with a 9.993% stake and Qatar Holding LLC with an 8.629% stake.¹⁴

In the fiscal year ending December 31, 2024, Glencore reported revenues of \$230.9 billion (approximately R4.23 trillion), an increase from \$217.8 billion (approximately R4.02 trillion) in 2023.¹⁵

► IMPORTANCE OF MINERALS IN THE CONTEXT OF THE JUST TRANSITION

The transition to a low-carbon economy necessitates a significant shift in energy production and consumption patterns, emphasising the adoption of renewable energy sources and sustainable technologies. Central to this transformation are specific minerals, notably chrome and platinum group metals (PGMs), which play pivotal roles in developing and implementing green technologies.

► CHROME AND STAINLESS STEEL IN RENEWABLE ENERGY INFRASTRUCTURE

Chrome is a critical component in the production of stainless steel, an alloy renowned for its corrosion resistance, strength, and durability. These properties make stainless steel indispensable in constructing renewable energy infrastructure¹⁶:

- **Wind Turbines:** Stainless steel is utilized in various components of wind turbines, including the tower, nacelle, and internal structures, due to its ability to withstand harsh environmental conditions and mechanical stress.¹⁷
- **Solar Panels:** In solar energy systems, stainless steel is employed for frames, supports, and fasteners, offering structural integrity and longevity essential for the operational lifespan of solar installations.
- The demand for stainless steel is projected to rise in tandem with the expansion of renewable energy projects globally, underscoring the importance of chrome in facilitating a sustainable energy transition.

¹² Ibid note 2 at 34.

¹³ Ibid.

¹⁴ <https://www.glencore.com/.rest/api/v1/documents/static/7a4295e4-3674-45e9-94c4-7d7fb285faff/GLEN-2024-Annual-Report.pdf>

¹⁵ <https://www.glencore.com/.rest/api/v1/documents/static/218c5d8d-cc96-47f9-8df3-f21116de5ea9/GLEN-2024-Preliminary-Results.pdf>

¹⁶ <https://luxmetalgroup.com/the-role-of-stainless-steel-in-renewable-energy-powering-a-sustainable-future/>

¹⁷ <https://www.teamstainless.org/un-development-goals/goal-13-climate-action/stainless-steel-in-renewable-and-carbon-free-power-generation/>

► PLATINUM GROUP METALS IN HYDROGEN TECHNOLOGIES

Platinum group metals, particularly platinum, are integral to hydrogen-based energy solutions, which are gaining prominence in the pursuit of zero-emission technologies:

- **Hydrogen Fuel Cells:** Platinum serves as a catalyst in proton exchange membrane (PEM) fuel cells, enabling the efficient conversion of hydrogen into electricity. This technology is pivotal for applications in transportation and stationary power generation.
- **Electrolysers:** In water electrolysis, platinum and iridium catalysts facilitate the splitting of water molecules to produce green hydrogen, a process essential for storing renewable energy and generating clean fuel.¹⁸
- The International Energy Agency (IEA) anticipates that hydrogen-related applications could account for approximately 11% of total platinum demand by 2030, highlighting the metal's growing significance in the energy transition.¹⁹

► ENSURING A JUST TRANSITION FOR MINING COMMUNITIES

As the demand for chrome and PGMs escalates, it is imperative to address the social and environmental impacts of mining activities to uphold the principles of a just transition. Historically, mining operations have been associated with adverse effects on local communities, including environmental degradation, displacement, and socio-economic disruptions.

A just transition emphasises equitable distribution of benefits and burdens associated with the energy shift, ensuring that affected communities are not left behind. Key considerations include:



- **Community Engagement:** Active involvement of local communities in decision-making processes related to mining projects is crucial. This includes obtaining free, prior, and informed consent, particularly from Indigenous populations, to respect their rights and livelihoods.²⁰
- **Environmental Stewardship:** Implementing sustainable mining practices that minimize environmental harm, such as land rehabilitation and pollution control, to protect ecosystems and public health.
- **Economic Diversification:** Investing in alternative economic opportunities and skills development for mining-dependent communities to reduce reliance on extractive industries and promote long-term resilience.

Corporations like Glencore, involved in the extraction of chrome and PGMs, bear a responsibility to integrate these considerations into their operations. By doing so, they can contribute to an energy transition that is not only environmentally sustainable but also socially equitable, ensuring that the move towards renewable energy benefits all stakeholders involved.

18 <https://agmetals.com/electrolyser-and-pgm/>

19 <https://www.cmegroup.com/articles/2024/platinum-group-metals-in-the-hydrogen-economy-midstream.html>

20 <https://www.wearehumanlevel.com/content-hub/just-transition-in-mining?>

WHAT IS A SOCIAL AND LABOUR PLAN

A Social and Labour Plan is a document that mining companies are required to submit to the Department of Mineral and Petroleum Resources (“DMPR”), formerly known as the Department of Mineral Resources and Energy (“DMRE”), as part of their application for mining rights. According to the Mineral and Petroleum Resources Development Act²¹ (“MPRDA”), mineral resources of the country are the common heritage of all who live in the country. Section 2(d) of the MPRDA further states that its objectives are to ‘substantially and meaningfully expand opportunities for historically disadvantaged persons, including women, to enter the mining and petroleum industries and to benefit from the exploration of the nation’s mineral and petroleum resources’. This emphasises the role of mineral resource extraction and operations as a pivotal means towards community development and women empowerment. SLPs, therefore, are how mineral and petroleum exploration can benefit communities.

According to section 23(1)(e) of the MPRDA, (as amended by section 19(b) of Act 49 of 2008), the Minister must grant 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 Act Regulations (Regulations) further provides for the regulations of SLPs. Section 41(c) states that the objective of the SLP is to ‘ensure that the holder of mining rights contribute towards the 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 sending areas. This report is limited to the contents of the LED section of the SLP, and the social audit focused on investigating this section.

An SLP becomes a legally binding document once it is approved by the DMRE, it contains 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, what the budgets are for, promised interventions or activities. It is, therefore, one of the instruments to address South Africa’s long history of inequality in the mining sector.

²¹ 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

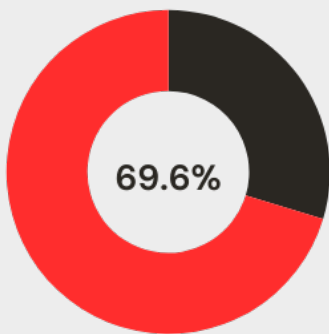
The SLPs are valid for a period of five (5) years and must be renewed every five (5) year period to ensure continuous benefit for communities such as Kroondal.

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.



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

The purpose of the SLP 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. In principle, SLPs should be drafted with the consultation of the communities, so that community member is able to participate meaningfully in their own development, 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 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 DMRE often does not follow up on these commitments or enforce them, to the detriment of mining-affected communities.

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 transparent and accountable mining operations.

“Members of the community collectively participate in the process of verifying an SLP of a particular mine by comparing the stated outcomes with the lived experiences of people on the ground.”

During a social audit, the expenditure and service delivery outcomes promised in the Social and Labour Plan of a mine are tested to determine whether community experiences regarding those outcomes reflect the vision of implementation as stated in the SLP. Members of the community collectively participate in the process of verifying an SLP of a particular mine by comparing the stated outcomes with the lived experiences of people on the ground. Evidence collected during a social audit is reported to the responsible stakeholders at a public meeting and used as a vehicle for advocacy by the host community.

Community testimony, knowledge and experiences are a legitimate and central part of this evidence. A social audit provides a way to build effective and meaningful

participation in poor and working-class communities by providing a means for a community to engage with a mining process that affects their lives.

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.

Mining companies, in South Africa, are vital to the economy. They can be likened to a power house for regional development and financial stability, which sometimes gives them an opportunity to spend resources for community service on PR consultants and programs that will manipulate the creation of engaging publications covering the social initiatives in their place of operation. The said Corporate Social Investment (CSI) strategies are normally integrated into Social Labour Plan (SLP) commitments, which may appear alright in principle, while on the ground they are not in harmony most of the time. SLPs are contractually binding and stakeholders in the area specified in the Mineral and Petroleum Resources Development Act of 2002 (MPRDA) are thus authorized to demand these commitments from the mining companies. The best approach to get to the bottom of the claims the companies make is to organize social audits that are community-driven and get evidence that shows what is happening on the ground to maybe question the public relations reports.

“According to the Mineral and Petroleum Resources Development Act (“MPRDA”), mineral resources of the country are the common heritage of all who live in the country

The aim of the social audit was to establish whether there has been any tangible and sustainable development to the community in Ikemeleng through the implementation of the SLP projects of Glencore between the years of 2014 and 2018. SLPs 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.
2. Assess whether Glencore’s SLP obligations are effective, efficient and provide sustainable goals to the community of Ikemeleng.
3. Determine if appropriate measures exist that:
4. establish, monitor, and communicate the SLP process and procedures with the community,
 - ensure reliable information is available for all stakeholders involved including the Ikemeleng community,
 - establish and communicate roles and responsibilities for all parties involved

In accordance to section 19b of the MPRDA, the minister must grant mining rights if the applicant has provided a financially and otherwise for the prescribed social and labour plan.²² Section 25 (2) (f) the mining right holder has a duty to comply with the SLP.²³ Section 25 (2) (h) read with section 28(2) (c) the mining right holder must report annually.

²² Ibid.

²³ Ibid.

METHODOLOGY

This social audit was a collaborative initiative undertaken by MACUA (Mining Affected Communities United in Action), WAMUA (Women Affected by Mining United in Action), and YAMUA (Youth Affected by Mining United in Action), with the support of the MACUA-WAMUA Advice Office (MWAo). The focal point of the audit was Glencore Waterval Chrome Mine's Social and Labour Plan (SLP) for the period 2014 to 2018.

The core objectives of the audit were threefold:

1. To evaluate the extent to which the residents of Ikemeleng, especially those directly affected by mining operations, were aware of and understood the obligations and commitments made in the SLP.
2. To assess whether the projects listed in the SLP translated into tangible socio-economic benefits for the community.
3. To empower community members with the tools and knowledge needed to monitor mining company compliance with legal obligations under the Mineral and Petroleum Resources Development Act (MPRDA).



Data systematically
collected and
analysed



Preliminary findings
shared with
community



Physical verification
of the projects

The process began with a capacity-building workshop hosted by MACUA, WAMUA, and YAMUA, specifically tailored for the Kroondal-Ikemeleng MACUA branch. This training session equipped participants with the legal and practical knowledge required to unpack the SLP: its structure, legal framework, and key contents. Importantly, the workshop emphasized how to identify and monitor SLP implementation and compliance.

Following the training, participants conducted a deep analysis of the SLP and selected three Local Economic Development (LED) projects for audit, based on locality and potential community impact.



These projects were:

- ▶ The **Construction of a High School** in Ikemeleng.
- ▶ The **Refurbishment of Tirelong Primary School**.
- ▶ The **Construction of an Administration Block** at JD Mosiah Primary School.

The audit team collectively developed a set of investigative questions to assess:

- ▶ Whether the identified projects had been implemented.
- ▶ The physical condition of those projects.
- ▶ The level of community awareness about the projects.
- ▶ Whether residents perceived any benefit from these interventions.

The social audit employed a mixed-methods approach. Door-to-door interviews were conducted across the community, with surveys designed by trained community members who had attended the initial workshop.

Once the surveys were completed, data was meticulously captured, cleaned, and analysed. Thereafter, physical site inspections of the selected projects were carried out to validate community feedback and assess the actual implementation status on the ground.

Importantly, throughout the social audit process, community members were empowered not only as participants but as researchers and monitors. They were trained in:

- ▶ **SLP interpretation** – understanding what mining companies commit to legally and developmentally.
- ▶ **Social audit methodology** – how to collect, verify, and analyse data from the ground up.
- ▶ **Survey design and implementation** – including door-to-door strategies to ensure inclusive and representative responses.

The audit reaffirmed that social audits are a powerful accountability tool, grounded in the principles of transparency, participation, and justice. By engaging directly with the SLP, communities are asserting their right to monitor corporate commitments and to demand that promised benefits materialise in ways that are meaningful, equitable, and sustainable.

This community-led process is not only a form of democratic participation but also a necessary corrective to the persistent exclusion and marginalisation experienced by mining-affected communities across South Africa.

The findings that emerged from this audit provide critical insights into the gap between paper promises and lived realities—and the need for systemic change in how social and labour plans are designed, implemented, and monitored.

DEMOGRAPHICS

A total of 159 individuals participated in the community survey conducted as part of the social audit. However, three surveys were excluded from the final dataset due to a high number of unanswered questions, resulting in a total of **156 valid responses**.

The gender identity breakdown of the participants is as follows:

- ▶ **Female:** 74 respondents (47%)
- ▶ **Male:** 79 respondents (51%)
- ▶ **Transgender:** 1 respondent (1%)
- ▶ **Gender Non-conforming:** 2 respondents (1%)

This distribution reflects a commendable level of gender diversity and inclusion in the survey sample, aligning with MACUA and WAMUA's commitment to representing the voices of all community members, including those often marginalised within mining-affected areas.

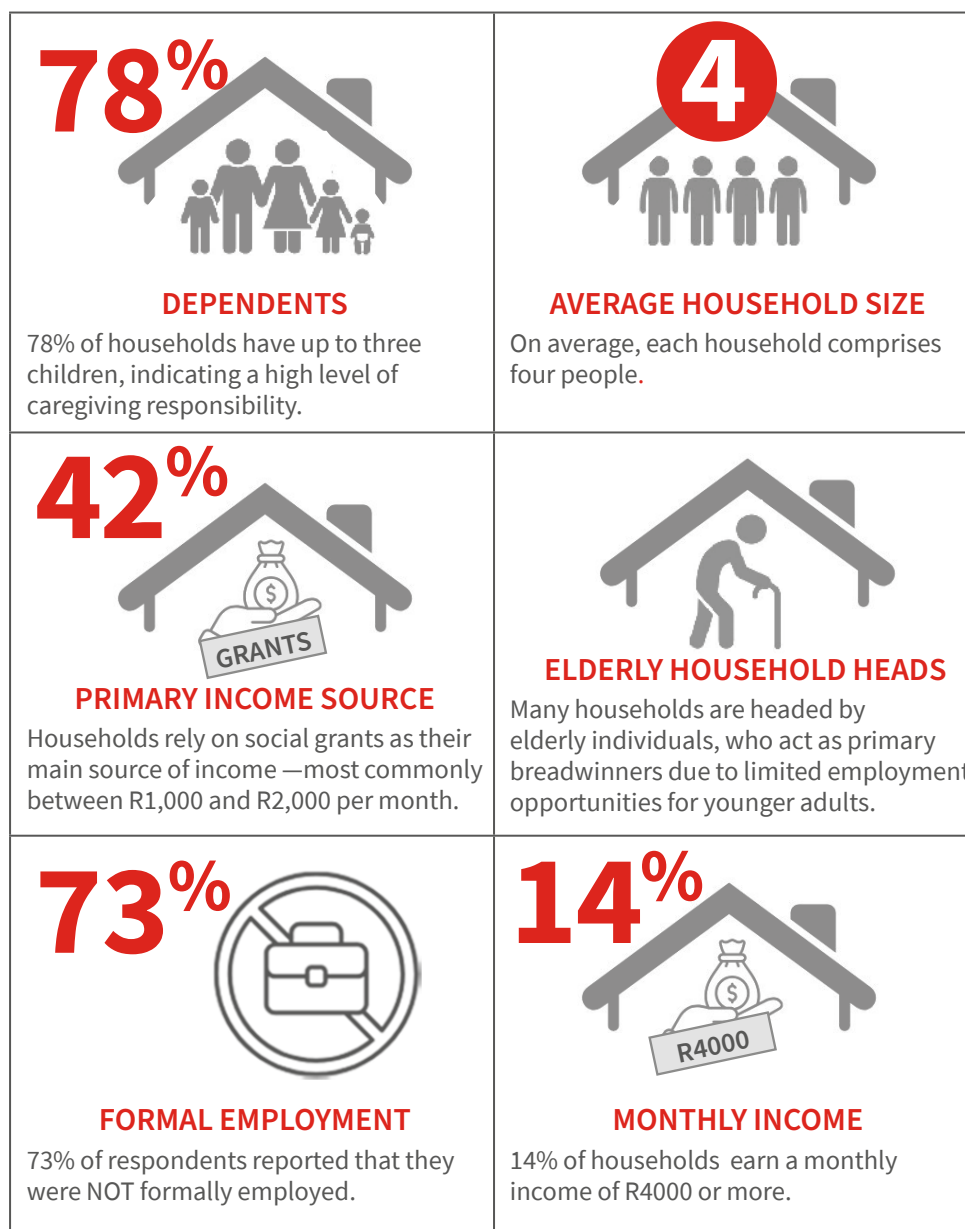
SOCIO-ECONOMIC IMPACT OF MINING IN IKEMELENG

The data gathered paints a complex picture of life in Ikemeleng, a community profoundly shaped by nearby mining activities. While the presence of mines has led to some employment opportunities, these benefits have not been equitably distributed.

Many residents who indicated that they are employed, are employed as low-wage labourers, often under precarious and insecure conditions. The broader economic value generated by mining operations appears to favour large mining corporations and a narrow group of local elites, rather than the community at large.

The audit also uncovered significant household-level socio-economic challenges:

- ▶ **Household size:** On average, each household comprises four people.
- ▶ **Dependents:** 124 respondents indicated that they have up to three children, reflecting a high level of dependency and care responsibilities.
- ▶ **Primary income sources:** A staggering 42% of households rely on **social grants** as their main source of income—most commonly in the range of **R1,000 to R2,000 per month**.
- ▶ **Elderly caregivers:** A significant number of households are headed by elderly individuals, who serve as the primary breadwinners in the absence of stable employment opportunities for younger adults.



The employment landscape is similarly bleak:

- ▶ Only 27% of respondents reported being formally employed.
- ▶ A mere 14% of households earn a monthly income of **R4,000 or more**.
- ▶ 12% of respondents indicated they have managed to secure livelihoods through **self-employment**, demonstrating some level of resilience and entrepreneurial initiative in the face of limited formal job opportunities.

ANALYSIS AND RECOMMENDATIONS

These findings are stark and highlight the chronic underdevelopment and economic exclusion experienced by the Ikemeleng community despite their proximity to resource-rich mining operations. The data underscores the urgent need for mining companies, particularly Glencore, to honour their Social and Labour Plan (SLP) commitments by creating **sustainable and inclusive economic opportunities** for the broader community.

The relatively high rate of matriculation among community members presents a critical opportunity. Skills development, enterprise incubation, and support for community-based cooperatives could go a long way in addressing unemployment and fostering long-term socio-economic resilience. These are precisely the kinds of interventions that SLPs are intended to deliver—but which, as this audit reveals, have not materialised adequately.

In conclusion, the audit reaffirms that without deliberate and community-centred investment in people and livelihoods, mining operations will continue to deepen inequality rather than contribute to sustainable development. Targeted implementation of SLP projects—designed in consultation with and for the benefit of Ikemeleng residents—must be prioritised.

FINDINGS

This section presents key findings from the community survey carried out during the social audit of Glencore Waterval Mine's Social and Labour Plan (SLP). It focuses on the company's consultation practices, the community's awareness and understanding of the SLP, and broader participatory gaps—including the systemic exclusion of women and vulnerable groups from developmental planning processes.

CONSULTATION: A GAP IN KNOWLEDGE AND ACCESS

According to the Mineral and Petroleum Resources Development Act (MPRDA), mining companies are legally obligated to engage in **meaningful consultation** with affected communities during the drafting and implementation of Social and Labour Plans. The Regulations under the MPRDA, as well as established case law, make clear that consultation must go beyond tokenism—it must be inclusive, informed, transparent, and enable communities to influence the decisions that affect their lives.

Yet, the findings from the Ikemeleng community reveal a stark disconnect between this legal obligation and lived reality:

- ▶ 48% of survey participants stated they had **no knowledge** of what an SLP is.
- ▶ A further 17% were unsure—suggesting unfamiliarity or only a vague recognition of the term.
- ▶ Only 34% reported having any knowledge of the SLP—and even then, their understanding was superficial. Most respondents could only repeat the acronym or describe it vaguely as “planning” or “consultation.”

Notably, just **24%** of respondents had ever seen a copy of the SLP document—**7% of whom were introduced to it for the first time through the social audit process itself**. This lack of visibility and engagement illustrates a failure by Glencore to ensure that community members are meaningfully informed about critical development commitments being made on their behalf.

Moreover, **67%** of participants reported that they had **never been invited** by Glencore to participate in consultations regarding the SLP, further confirming the lack of transparency and public participation in its formulation.

IDPS AND MUNICIPAL PLANNING: PARALLEL EXCLUSION

The audit also assessed the community's participation in **Integrated Development Plans (IDPs)**—the strategic frameworks used by municipalities to align local development priorities with public and private sector resources, including contributions from mining houses.

Ikemeleng is specifically mentioned in the 2022–2027 Rustenburg Local Municipality IDP²⁴ as a beneficiary of a **R72 million electrification and formalisation project**, co-funded by Glencore, Aquarius, Sibanye, and the municipality itself. However, this investment was **not widely known or understood** among residents, raising serious concerns about the legitimacy of the public participation process behind these decisions.

Survey results show that:

- ▶ **64%** of community members had **never been invited** to IDP consultation meetings.
- ▶ While **35%** indicated they had been invited, a majority (**56%**) noted that **women rarely participate** in those spaces—reflecting persistent gender exclusion in decision-making processes.

These figures suggest a deeply embedded culture of exclusion in both mining and municipal governance structures—raising questions about the authenticity of community development planning, and whether it genuinely reflects the aspirations and needs of Ikemeleng's residents.

48%
had no knowledge
of what an SLP is

²⁴ Rustenburg Local Municipality, Integrated Development Plan (IDP) 2022–2027, Final Version, p. 345. Available at: <https://www.rustenburg.gov.za/wp-content/uploads/2022/07/IDP-2022-2027-FINAL.pdf> (accessed 17 July 2025).

A COMMUNITY IN THE DARK

A recurring theme throughout the audit was the **community's sense of disempowerment** and disconnect from both mining operations and public governance:

- ▶ Many residents expressed that they are **not informed** about ongoing or planned development projects in their community.
- ▶ Others shared that they are **unaware of who makes decisions** and how those decisions are communicated—if at all.

This invisibilisation of community voices undermines the intent of the MPRDA and violates the fundamental democratic principle that **those most affected by decisions must have a say in shaping them**.

THE CASE FOR MEANINGFUL CONSULTATION

Meaningful engagement with mining-affected communities is not merely a procedural requirement—it is a cornerstone of democratic accountability, sustainable development, and corporate social responsibility.

Transparent, inclusive, and participatory processes ensure:

- ▶ **Trust** between companies, communities, and government.
- ▶ **Reduced conflict** and discontent in mining-affected areas.
- ▶ **Improved alignment** between development projects and community needs.
- ▶ **Empowerment** of historically marginalised groups, particularly women.

Unfortunately, the findings of this social audit make it clear that Glencore has failed to uphold these standards in Ikemeleng. Similarly, local government entities have not ensured inclusive public participation in IDP processes, further entrenching cycles of exclusion and inequality.

These shortcomings are not only a breach of legal and ethical obligations but also represent missed opportunities for partnership and shared prosperity.

“Meaningful engagement ... is a cornerstone of democratic accountability, sustainable development, and corporate social responsibility.”

COMMUNITY BENEFITS FROM THE MINE

This section presents findings from the social audit concerning community awareness and perceptions of employment and development opportunities provided by Glencore Waterval Mine. The data reveals significant concerns regarding accessibility, transparency, and gender equity in these opportunities.

LIMITED AWARENESS AND ACCESSIBILITY OF OPPORTUNITIES

When asked about opportunities created by Glencore for community benefit:

- ▶ 36% of respondents noted that Glencore had provided very few opportunities to the community.
- ▶ 24% acknowledged that the company had provided some opportunities.

The remaining respondents were either unaware of any opportunities or did not perceive them as beneficial. Reasons cited for this limited awareness include:

- ▶ **Information Gaps:** The mine's proximity to the community does not translate into effective communication, leading to many residents being uninformed about available opportunities.
- ▶ **Perceived Corruption:** There is a prevalent belief that securing positions at Glencore requires bribes or, disturbingly, sexual favors for women.

EMPLOYMENT CHALLENGES AND ALLEGATIONS OF NEPOTISM

Regarding employment at the mine:

- ▶ 37% of respondents reported having been employed at Glencore at some point.
- ▶ 41% indicated difficulty in securing employment, attributing challenges to:
 - **Nepotism:** A perception that hiring practices favour relatives or close associates of current employees.
 - **Bribery:** Allegations that monetary or other illicit exchanges are prerequisites for employment.

These perceptions underscore a broader sentiment of disenfranchisement and mistrust toward the mine's hiring processes.

GENDER DISPARITIES IN EMPLOYMENT

Concerns about gender equality in employment opportunities were prominent:

- ▶ 51% of respondents felt that Glencore does not employ men and women equally.
- ▶ 24% believed there is gender parity in employment practices.

This perception aligns with broader industry trends. According to the Minerals Council South Africa, women represent only 12% of the country's total mining labour force, with 17% in chrome mining specifically. This underrepresentation highlights systemic barriers to women's participation in the mining sector.²⁵

25 <https://www.mineralscouncil.org.za/womeninmining/wp-content/uploads/2023/08/fact-sheet-minerals-council-women-in-mining-sa-2020.pdf>

TRAINING OPPORTUNITIES AND BARRIERS TO ACCESS

On the topic of training and skills development:

- ▶ 37% of respondents knew someone from the community who had participated in training offered by Glencore.

However, concerns were raised about the selection process:

- ▶ **Councillor Involvement:** The heavy involvement of local councillors in participant selection is perceived to compromise objectivity and transparency.
- ▶ **Bribery Allegations:** Similar to employment, there are claims that bribes are solicited for access to training programs, exacerbating vulnerabilities among community members.

These issues point to systemic flaws in the dissemination and allocation of developmental opportunities, further marginalising already disadvantaged groups.



ANALYSIS AND RECOMMENDATIONS

The findings indicate a critical need for Glencore Waterval Mine to:

1

Enhance Transparency: Implement clear, accessible, and corruption-free processes for employment and training opportunities.

2

Improve Communication: Establish effective channels to disseminate information about available opportunities to all community members.

3

Promote Gender Equality: Develop targeted initiatives to increase women's participation in mining roles, addressing both recruitment and retention challenges.

4

Decouple Political Influence: Ensure that local political figures do not have undue influence over the selection processes for training and employment, safeguarding merit-based access.

Addressing these areas is essential for fostering trust, promoting equitable development, and ensuring that the community genuinely benefits from the mine's operations.

WOMEN IN MINING AFFECTED COMMUNITIES

Women in mining-affected communities encounter multifaceted forms of exclusion—social, economic, environmental, and gender-based—that are deeply rooted in historical and cultural factors. These systemic barriers perpetuate disadvantages within the mining industry and broader societal structures.

EXCLUSION FROM DECISION-MAKING PROCESSES

A significant challenge faced by women in these communities is their exclusion from local decision-making and developmental planning. Surveys conducted during the social audit in Ikemeleng revealed that women are often marginalised in participatory processes aimed at crafting community development programs. This exclusion undermines their rights to meaningful participation as envisioned in the Mineral and Petroleum Resources Development Act (MPRDA). Such marginalisation not only sidelines women's voices but also hampers the creation of inclusive and representative community initiatives.

BURDEN OF REPRODUCTIVE AND ECONOMIC LABOR

In mining-affected communities, women disproportionately shoulder the burden of reproductive labour, effectively subsidising the mining industry.

Many women, particularly those heading households, are tasked with ensuring both the economic sustainability of their families and fulfilling caregiving roles. Despite these dual responsibilities, opportunities and projects are frequently not tailored to support their socio-economic upliftment.

This oversight perpetuates cycles of poverty and limits avenues for women's advancement.



LACK OF GENDER-SPECIFIC DEVELOPMENT INITIATIVES

An analysis of Social and Labour Plan (SLP) projects indicates a glaring absence of initiatives aimed specifically at the socio-economic development of women in the community.

Economic empowerment is crucial for women as it fosters independence and serves as a mitigating factor against gender-based violence. The omission of gender-focused projects reflects a broader neglect of women's unique needs and potential contributions within these communities.

GENDERED VIOLENCE AND EXPLOITATIVE PRACTICES

The gendered nature of violence is evident in the challenges women face when accessing training and employment opportunities. While 53% of survey respondents believed it is not difficult for women to secure jobs at the mine, many highlighted exploitative practices, noting that "women are urged to sleep with managers" to obtain positions. This exploitation underscores the urgent need for systemic reforms to protect women's rights and dignity in the workplace.

SYSTEMIC BARRIERS AND CULTURAL STEREOTYPES

The mining industry has traditionally been male-dominated, necessitating transformation to address entrenched cultural norms and stereotypes that contribute to the exploitation and violation of women. These deep-rooted biases not only hinder women's participation but also perpetuate discriminatory practices within the industry.

RECOMMENDATIONS FOR INCLUSIVE DEVELOPMENT

Addressing the exclusion of women in mining communities requires a multifaceted approach:

1. **Promote Inclusive Participation:** Ensure women's active involvement in decision-making processes at both community and municipal levels.
2. **Develop Gender-Specific Programs:** Implement initiatives focused on the socio-economic empowerment of women, including targeted training and employment opportunities.
3. **Challenge Cultural Stereotypes:** Conduct awareness campaigns to dismantle implicit biases and promote gender equality within the community and industry.
4. **Enhance Representation:** Increase the presence of women in leadership and decision-making roles within the mining sector and local governance structures.

By addressing both systemic barriers and societal perceptions, it is possible to create an environment where women in mining-affected communities can fully participate and benefit from developmental initiatives.

BREAKDOWN OF THE AUDITED PROJECTS

It is of importance to note that 3 projects were audited in the 2014 – 2018 social and labour plan of Glencore Waterval Mine that were supposed to be implemented in the community of Ikemeleng. The below constitute the results of the communities' responses to the questionnaires as well as the physical inspections conducted by the social audit team.

PROJECT 1: CONSTRUCTION OF A HIGH SCHOOL AT IKEMELENG

As part of its 2014–2018 Social and Labour Plan (SLP), Glencore Waterval Mine committed to funding and overseeing the construction of a high school in the informal settlement of Ikemeleng. This commitment, aligned with the mine's Local Economic Development (LED) obligations under the Mineral and Petroleum Resources Development Act (MPRDA), was intended to support educational infrastructure and uplift the surrounding community.

PROJECT COMMITMENTS (AS STATED IN THE SLP)

- ▶ **Project:** Construction of a High School in Ikemeleng
- ▶ **Partner:** Department of Education
- ▶ **Budget Allocation:** R18,000,000
- ▶ **Planned Jobs Created:** None
- ▶ **Planned Completion:** First quarter of 2016
- ▶ **Exit Strategy:** Transfer of responsibility for maintenance and upkeep to the Department of Education

COMMUNITY AWARENESS AND PERCEPTIONS

Despite the scale and significance of this project, the social audit revealed alarming gaps in community awareness and information-sharing:

- ▶ **55%** of respondents indicated that they were **not aware** of Glencore's commitment to build a high school in their community.
- ▶ Only **37%** of respondents said they were aware of the project.
- ▶ The vast majority of participants were **unaware of the project's R18 million budget**, and many were surprised to learn about its scale.

This lack of awareness underscores a fundamental failure in stakeholder engagement and transparency—principles that are central to the intent and legal framework of SLPs. As outlined in Regulation 46 of the MPRDA, meaningful consultation and information sharing with affected communities is not optional, but a legal requirement.



FINDINGS FROM PHYSICAL VERIFICATION

In 2023, the social audit team conducted a **site inspection and verification process** to determine whether the project had been implemented as committed.

- ▶ Community members confirmed that **no high school has been constructed** in Ikemeleng as of the audit date.
- ▶ As a result, students continue to travel long distances to attend secondary school in neighbouring areas, placing both logistical and financial strain on families.
- ▶ Several respondents described the supposed “school” site as either non-existent or in “poor condition,” further raising questions about budget accountability and project execution.

These findings suggest **non-implementation of a legally binding commitment** made by Glencore, raising serious concerns around compliance, transparency, and oversight. The SLP, once approved by the Department of Mineral Resources and Energy (DMRE), becomes enforceable, and non-fulfilment of its obligations should be subject to regulatory action under Sections 25(2)(f) and 28(2)(c) of the MPRDA.

IMPLICATIONS FOR DEVELOPMENT AND ACCOUNTABILITY

The non-construction of the Ikemeleng High School represents more than just a broken promise—it is a **denial of a fundamental right to education** and a lost opportunity to uplift an underserved community. The absence of such critical infrastructure perpetuates structural inequality and undermines the credibility of the SLP framework as a tool for transformation.

The failure to implement this project also contradicts the principles of a “just transition,” which calls for inclusive, equitable development in mining-affected communities as the global energy landscape shifts.

RECOMMENDATIONS

1. **Immediate Investigation and Public Disclosure:** The DMRE must urgently investigate the status of the R18 million earmarked for the high school and publish its findings.
2. **Re-engagement with the Community:** Glencore and the Department of Education should return to the community to clarify the project status and co-develop a revised implementation plan, in line with participatory development principles.
3. **Monitoring and Enforcement:** Regulatory bodies must ensure that Glencore is held accountable for its SLP commitments and that non-compliance is addressed through enforcement mechanisms.
4. **Access to Information:** The community should be provided with user-friendly summaries of the SLP and future reports on its implementation in isiXhosa, isiZulu, Sesotho, and Afrikaans, as required under Section 100 of the MPRDA guidelines for community participation.

This case highlights the essential role of social audits in uncovering discrepancies between mining company commitments and on-the-ground realities. Without community-led monitoring and accountability, projects such as this risk becoming symbolic gestures rather than vehicles for meaningful change.

PROJECT 2: REFURBISHMENT OF THE TIRELONG PRIMARY SCHOOL

As part of its 2014–2018 Social and Labour Plan (SLP), Glencore Waterval Mine committed to refurbishing **Tirelong Primary School** in Ikemeleng. The objective was to restore and upgrade the facility to create a safe and conducive learning environment for young learners, following the school's reassignment from a high school to a primary school in a Department of Education-led intervention.

STATED COMMITMENTS IN THE SLP

- ▶ **Project:** Refurbishment of Tirelong Primary School
- ▶ **Partner:** Department of Education
- ▶ **Budget Allocation:** R2.5 million
- ▶ **Planned Jobs Created:** None
- ▶ **Completion Date:** February 2016
- ▶ **Exit Strategy:** Transfer of responsibility for ongoing maintenance to the Department of Education
- ▶ **Additional Input:** Provision of a 35-computer laboratory

The project, according to Glencore's SLP, aimed to improve the school's infrastructure to meet minimum safety and educational standards, with a particular emphasis on revitalising facilities for young children.

COMMUNITY AWARENESS AND FEEDBACK

Despite the stated commitments, community survey data revealed significant shortcomings in awareness and satisfaction:

- ▶ 71% of respondents were **unaware** that Glencore had committed to refurbishing the school.
- ▶ 62% noted they had seen **no noticeable improvements** in the school's physical infrastructure.
- ▶ **Only 24%** reported some level of awareness or acknowledgment that refurbishment had occurred.
- ▶ A further **31%** confirmed having seen the completed project, though perceptions of its quality were mixed.
- ▶ Critically, **42%** of respondents rated the project as **poor**, reflecting widespread dissatisfaction.

These figures suggest a disconnect between what was planned on paper and what was delivered in practice—and, crucially, between the company and the community it claims to serve.

PHYSICAL VERIFICATION AND INFRASTRUCTURE ASSESSMENT

In 2023, the social audit team conducted a site visit to **Tirelong Primary School** (also referred to in the audit as Kroondal Primary School). The team met with senior teachers and conducted a visual inspection of the premises to verify implementation of the refurbishment project.

KEY FINDINGS FROM THE SITE VISIT:

- ▶ The **only visible improvement** attributed to Glencore was the **construction of a perimeter fence** around the school.
- ▶ No additional infrastructure upgrades—such as improvements to classrooms, sanitation facilities, water access, or electrical systems—were observed or reported.
- ▶ The timeline of the fence construction could not be confirmed, raising further questions about transparency and tracking of project implementation.

A teacher described the fence as a “lone sentinel”—symbolic of limited progress, rather than the comprehensive refurbishment envisioned in the SLP.



CRITICAL ANALYSIS: FAILURE TO MEET COMMITMENTS

The findings suggest a clear **shortfall between Glencore’s legally binding commitments** and the actual outcomes delivered:

- ▶ While fencing may enhance school security, it falls well short of meeting the broader educational and infrastructural needs of the school.
- ▶ No evidence was found to support the deployment of the R2.5 million budget toward substantive classroom, sanitation, or facility improvements—key components of a functional learning environment.
- ▶ The provision of the 35-computer lab could not be verified during the audit; if implemented, it was not apparent during the site visit.

This project exemplifies the **broader failure of mining companies to uphold their SLP obligations**, particularly in relation to educational infrastructure—one of the core pillars of social development and transformation.

WIDER CONTEXT: EDUCATION AND MINING RESPONSIBILITIES

South Africa faces a chronic infrastructure backlog in schools, especially in rural and under-resourced communities. According to the Department of Basic Education, thousands of schools still lack proper toilets, libraries, internet access, and basic infrastructure like running water or electricity²⁶. Mining companies, through SLPs, are positioned to play a critical role in closing this gap. When those obligations are not fulfilled, the result is a direct violation of children’s right to education as enshrined in **Section 29 of the Constitution of South Africa**.

RECOMMENDATIONS

1. **Comprehensive Independent Audit:** An urgent review of the project’s expenditures and deliverables should be conducted by an independent body, with public disclosure of results.
2. **Community Engagement:** Glencore must re-engage with the Ikemeng community and the Department of Education to jointly reassess the school’s needs and co-design a proper refurbishment plan.
3. **SLP Monitoring Reform:** The DMRE should enhance oversight mechanisms to ensure SLP projects are verifiably completed, with consequences for non-compliance.
4. **Transparent Budget Tracking:** Future projects must include publicly accessible expenditure tracking and reporting frameworks to enable real-time monitoring by community members and stakeholders.

26 <https://equaleducation.org.za/document/dbe-proposed-amendments-to-norms-and-standards-june-2022/>

CONCLUSION:

Glencore's refurbishment commitment at Tirelong Primary School represents a missed opportunity to make a meaningful contribution to education in Ikemeleng. The minimal delivery—a fence without supporting upgrades—fails to meet the legal, ethical, and developmental expectations set out in the company's SLP. Urgent corrective action is needed to restore accountability and ensure the community receives the support it was promised.

PROJECT 3: CONSTRUCTION OF AN ADMINISTRATION BLOCK AT JD MOSIAH PRIMARY SCHOOL

As part of its 2014–2018 Social and Labour Plan (SLP), Glencore Waterval Mine committed to constructing a **new administration block** at JD Mosiah Primary School, located within the community of Ikemeleng. The project was framed as an infrastructural intervention aimed at improving administrative and learning conditions in the school, thereby benefiting both staff and learners.

STATED COMMITMENTS IN THE SLP

- ▶ **Project:** Construction of an administration block at JD Mosiah Primary School
- ▶ **Partner:** Department of Education
- ▶ **Intended Beneficiary:** Community of Ikemeleng
- ▶ **Total Budget Allocation:** R5,000,000
- ▶ **Jobs Created:** None reported
- ▶ **Planned Completion:** February 2016
- ▶ **Exit Strategy:** Maintenance and upkeep to be assumed by the Department of Education

COMMUNITY AWARENESS AND PERSPECTIVES

Survey data from the social audit revealed a mixed picture in terms of community awareness and engagement:

- ▶ 54% of respondents were **unaware** of the commitment to build the administration block.
- ▶ 33% of respondents **had some knowledge** of the project—higher than awareness levels for the other two audited SLP projects.



However, even among those who were aware, the perceived impact of the project on the broader community was limited:

- ▶ A majority of respondents did **not view the project as meaningfully contributing** to local development.
- ▶ Several participants expressed concerns about the **budget allocation**, suggesting that R5 million may not have been sufficient to construct a fully functional administration block and raised suspicions about the **potential exploitation of labour or material sourcing**.

These sentiments highlight the consequences of excluding community members during the SLP formulation stage. A lack of participation not only undermines the legitimacy of the project but can also erode trust in its benefits—even when delivery occurs.

PHYSICAL VERIFICATION AND INFRASTRUCTURE ASSESSMENT

The social audit team conducted a **physical inspection** of JD Mosiah Primary School to verify whether the project had been implemented and to assess the condition of the infrastructure. The audit team also met with the school principal to obtain additional verification and insights.

KEY FINDINGS:

- ▶ The **administration block was successfully constructed**, in line with Glencore's SLP commitment.
- ▶ The building appeared to be in **generally good structural condition**.
- ▶ According to the principal, the project was **completed in 2022**, and the school was informed of the total expenditure. However, the audit team was not provided with official financial records to independently verify the budget.

CRITICAL DEFICIENCIES: NON-FUNCTIONAL TOILETS

While the structure itself had been completed, the audit revealed a **major shortfall**: the **toilets inside the administration block were non-operational** at the time of inspection. This undermines the integrity and utility of the entire facility. Sanitation is a fundamental aspect of any public building, particularly in an educational setting where hygiene and safety are paramount.

This critical failure reflects either an incomplete project handover, insufficient oversight during construction, or neglect in post-construction maintenance—each of which raises important concerns around compliance, accountability, and the overall quality of delivery.

BROADER IMPLICATIONS AND SYSTEMIC CONCERNS

The construction of the administration block demonstrates **partial compliance** with SLP obligations. While the infrastructure was completed, the **inoperable sanitation facilities** point to **deficiencies in project execution and quality assurance**. In the context of South Africa's ongoing school infrastructure challenges—including widespread lack of water, sanitation, and classroom space—this type of oversight is unacceptable.

According to the Department of Basic Education, as of 2023, over 3,400 schools still rely on pit latrines, and hundreds lack adequate toilet facilities entirely.²⁷ In this context, every school infrastructure project must be maximised for impact and functionality.

RECOMMENDATIONS**1**

Immediate Remedial Action: Glencore must ensure that the non-functional toilets are repaired or completed without delay and report publicly on the timeline for this remediation.

2

Independent Budget Review: The DMRE and Department of Education should conduct an audit to confirm that the R5 million budget was spent in accordance with SLP commitments.

3

Community Feedback Mechanism: Future SLP projects should include mechanisms for community feedback and real-time monitoring to avoid similar issues and foster inclusive development.

4

Sustainability Plan: The Department of Education should be supported to maintain the building and ensure proper utility functionality going forward.

27 <https://www.education.gov.za/Research%2CMonitoringEvaluationReports.aspx>

While Glencore fulfilled the physical construction component of its commitment at JD Mosiah Primary School, the **incomplete functionality of the building**—notably the lack of working toilets—undermines the overall value and utility of the project. This points to broader issues in project management and accountability within SLP implementation. To restore credibility and meet the real needs of Ikemeleng learners and educators, urgent corrective action is required.

CONCLUSION

The findings of this social audit reveal a persistent disconnect between Glencore Waterval Mine's commitments under its Social and Labour Plan (SLP) and the lived realities of the Ikemeleng community.

Despite legally binding obligations to promote local development, the projects implemented have either been inadequately delivered, poorly communicated, or completely unfulfilled. Most critically, the community has been systematically excluded from meaningful consultation and decision-making processes, undermining both the intent and spirit of the Mineral and Petroleum Resources Development Act (MPRDA).



The Just Transition must not replicate the injustices of the extractive economy—it must repair them. For this to happen, mining-affected communities like Ikemeleng must be recognised not as passive recipients of corporate social investment, but as rights-holders and development partners in shaping a more equitable future.

This failure has profound implications—not only for socio-economic development but also for the legitimacy of the SLP framework itself as a tool for transformation. The absence of transparency, the exclusion of women and marginalised voices, and the perception of corruption in access to opportunities reveal a deeper structural crisis of accountability and justice in the way mining companies engage with affected communities.

As South Africa moves towards a **Just Transition**—a shift to a low-carbon economy that must be socially just and inclusive—these findings are especially critical. Minerals like chrome and platinum group metals (PGMs) will play a central role in powering the green economy, from hydrogen fuel cells to solar and wind infrastructure. However, the transition cannot be considered “just” if the very communities bearing the environmental, social, and economic costs of extraction continue to be marginalised and excluded from its benefits.

To ensure a truly just and inclusive transition, the following must be prioritised:

- ▶ **Meaningful and transparent community participation** in all phases of planning, implementation, and monitoring of mining and SLP projects.
- ▶ **Gender-responsive development strategies**, including targeted training, leadership, and economic empowerment initiatives for women.
- ▶ **Public access to information** on budgets, project outcomes, and procurement processes to restore trust and enable community oversight.
- ▶ **Independent enforcement and monitoring** by regulatory authorities to ensure full compliance with SLP commitments.
- ▶ **Integrated planning** between mining companies and municipalities, aligned with community-defined needs and local development plans.

The Just Transition must not replicate the injustices of the extractive economy—it must repair them. For this to happen, mining-affected communities like Ikemeleng must be recognised not as passive recipients of corporate social investment, but as rights-holders and development partners in shaping a more equitable future.

SLP PROJECT AUDIT MATRIX – GLENCORE WATERVAL MINE (IKEMELENG SOCIAL AUDIT)

PROJECT	CLAIMED SLP COMMITMENT	DEVELOPMENT POTENTIAL	STATUS	CLAIMED VALUE (R)	ACTUAL VALUE ACCRUED	COMPLETION SCORE (%)	COMMUNITY VALUE SCORE (%)
Construction of a High School – Ikemeleng	Build and hand over a new high school; partner with DoE; R18M; completed Q1 2016	High (Education, Youth Development, Access)	Not completed – no school exists, students still travel	18M	None – project not delivered	0	10
Refurbishment of Tirelong Primary School	Refurbish existing school, R2.5M, computer lab, DoE partnership, completed Feb 2016	Medium-High (Education Quality, Infrastructure)	Partially completed – only fencing, no substantive refurbishments found	2.5M	Low – fencing only, no material improvement to learning conditions	40	28
Construction of Admin Block – JD Mosiah Primary School	Build new admin block, R5M, DoE partnership, completed Feb 2016	Medium (Admin Capacity, School Management)	Completed – building exists but toilets not working	5M	Partial – structure built but incomplete due to non-functional toilets	80	45

Total Completion Score: 120 / 300

Average Completion Score: 40.0%

Average Community Value Score: 27.67%