

APPENDIX A

FLORA SPECIES RECORDED

Plant Species Identified During Field Survey (April 2017)

Trees	Shrubs	Forbs	Grasses	Cyperoids
<i>Acacia sieberiana</i>	<i>Gnidia kraussiana</i>	<i>Achyranthes aspera</i>	<i>Andropogon eucomus</i>	<i>Cyperus digitatus</i>
<i>Albizia antunesiana</i>	<i>Blumea alata</i>	<i>Amaranthus hybridus</i>	<i>Andropogon gayanus</i>	<i>Cyperus esculentus</i>
<i>Brachystegia spiciformis</i>	<i>Eriosema ellipticum</i>	<i>Bidens biternata</i>	<i>Aristida junciformis</i>	<i>Cyperus tenax</i>
<i>Burkea africana</i>	<i>Eriosema engleranum</i>	<i>Bidens pilosa</i>	<i>Arundinella nepalensis</i>	<i>Kylinga erecta</i>
<i>Combretum molle</i>	<i>Euclea crispa</i>	<i>C. albida</i>	<i>Brachiaria deflexa</i>	<i>Pycreus aethiops</i>
<i>Cussonia arborea</i>	<i>Gnidia kraussiana</i>	<i>Ceratotheca triloba</i>	<i>Cynodon dactylon</i>	<i>Typha latifolius</i>
<i>Ekebergia benguelensis</i>	<i>Helichrysum kraussii</i>	<i>Conyza albida</i>	<i>Dactyloctenium aegyptium</i>	
<i>Faurea speciosa</i>	<i>Indigofera arrecta</i>	<i>Conyza welwitschii</i>	<i>Digitaria scalarum</i>	
<i>Julbembardia globiflora</i>	<i>Lantana camara</i>	<i>Datura stramonium</i>	<i>Eleusine indica</i>	
<i>Kigellia africana</i>	<i>Leptactina benguelensis</i>	<i>Euphorbia cyparissoides</i>	<i>Eragrostis capensis</i>	
<i>Ochna puhra</i>	<i>Lippia javanica</i>	<i>Haumaniastrum sericeum</i>	<i>Eragrostis chapelieri</i>	
<i>Ozoroa insignis</i>	<i>Lopholaena coriifolia</i>	<i>Helichrysum species</i>	<i>Eragrostis spp.</i>	
<i>Parinari curatellifolia</i>	<i>Maytenus heterophylla</i>	<i>Kniphofia linearifolia</i>	<i>Hemarthria altissima</i>	
<i>Strychnos spinosa</i>	<i>Maytenus senegalensis</i>	<i>Oldenlandia corymbosa</i>	<i>Heteropogon contortus</i>	
<i>Vangueria infausta</i>	<i>Pavetta schumanniana</i>	<i>Oldenlandia herbacea</i>	<i>Hyparrhenia filipendula</i>	
<i>Senna didymobotrya</i>	<i>Rhynchosia resinosa</i>	<i>Polygonum senegalense</i>	<i>Hyperthelia dissoluta</i>	
		<i>Ranunculus multifidus</i>	<i>Melinis repens</i>	
		<i>Senecio strictifolius</i>	<i>Monocymbium cerasiiforme</i>	
		<i>Sesbania microphylla</i>	<i>Paspalum urvillei</i>	
		<i>Solanum delagoense</i>	<i>Perotis patens</i>	
		<i>Tagetes minuta</i>	<i>Pogonarthria squarrosa</i>	
		<i>Verbena bonariensis</i>	<i>Setaria pumila</i>	
			<i>Sporobolus pyramidalis</i>	
			<i>Sporobolus subtilis</i>	
			<i>Themeda triandra</i>	
			<i>Oryza barthii</i>	
			<i>Ischaemum afrum</i>	
			<i>Brachiaria humidicola</i>	
			<i>Echinochloa pyramidalis</i>	

Trees	Shrubs	Forbs	Grasses	Cyperoids
			<i>Entolasia imbricata</i>	
			<i>Hyparrhenia nyassae</i>	

APPENDIX B

FAUNA SPECIES RECORDED

Fauna Species Identified During Field Survey (April 2017)

Family	Biological Name	Common Name	IUCN Status
Reptile Species			
AGAMIDAE	<i>Agama mossambica</i>	Mozambique gama	Not Listed
COLUBRIDAE	<i>Daspeltis scabra</i>	Egg-eating snake	Least Concern
COLUBRIDAE	<i>Philothamnus semivariiegatus</i>	Spotted bush snake	Not Listed
CROCODYLIDAE	<i>Crocodylus niloticus</i>	Nile crocodile	Least Concern
GEKKONIDAE	<i>Lygodactylus capensis</i>	Cape dwarf gecko	Not Listed
LAMPROPHIIDAE	<i>Duberria lutrix</i>	Common slug-eater	Least Concern
	<i>Amblyodipsas polylepis</i>	Common purple-glossed snake	Not Listed
	<i>Lycophidion capense</i>	Cape wolf snake	Not Listed
SCINCIDAE	<i>Trachylepis margaritifer</i>	Rainbow skink	Least Concern
	<i>Trachylepis varia</i>	Variable skink	Not Listed
VIPERIDAE	<i>Causus rhombeatus</i>	Rhombic night adder	Not Listed
	<i>Bitis arietans</i>	Puff adder	Not Listed
Amphibian Species			
BREVICIPITIDAE	<i>Breviceps mossambicus</i>	Mozambique rain frog	Least Concern
BUFONIDAE	<i>Amietophrynus gutturalis</i>	African common toad	Least Concern
	<i>Amietophrynus garmani</i>	Garman's toad	Least Concern
HYPEROLIIDAE	<i>Hyperolius pusillus</i>	Waterlily reed frog	Not Listed
HYPEROLIIDAE	<i>Kassina senegalensis</i>	Senegal kassina (Senegal land frog)	Least Concern
Mammal Species			
ORYCTEROPODIDAE	<i>Orycteropus afer</i>	Aardvark	Least Concern
GALAGIDAE	<i>Galago moholi</i>	Mohol bushbaby	Least Concern
CERCOPITHECIDAE	<i>Chlorocebus pygerythrus</i>	Vervet monkey	Least Concern
HYSTRICIDAE	<i>Hystrix africae australis</i>	Cape porcupine	Least Concern
THRYONOMYIDAE	<i>Thryonomys gregorianus</i>	Lesser cane rat	Least Concern
SCIURIDAE	<i>Paraxerus flavovittis</i>	Striped bush squirrel	Least Concern
NESOMYIDAE	<i>Dendromus melanotis</i>	Gray climbing mouse	Least Concern
	<i>Dendromus mesomelas</i>	Brant's climbing mouse	Least Concern
	<i>Steatomys pratensis</i>	Fat mouse	Least Concern
	<i>Cricetomys gambianus</i>	Gambian pouched rat	Least Concern
	<i>Saccostomus campestris</i>	South African pouched mouse	Least Concern
MURIDAE	<i>Acomys spinosissimus</i>	Spiny mouse	Least Concern
	<i>Otomys angoniensis</i>	Angoni vlei rat	Least Concern
	<i>Tatera leucogaster</i>	Bushveld gerbil	Least Concern
	<i>Aethomys kaiseri</i>	Kaiser's rock rat	Least Concern
	<i>Dasymys incomtus</i>	African marsh rat	Least Concern
	<i>Grammomys dolichurus</i>	Woodland thicket rat	Least Concern
	<i>Lemniscomys rosalia</i>	Single-striped grass mouse	Least Concern
	<i>Mastomys natalensis</i>	Natal multimammate mouse	Least Concern
<i>Mus minutoides</i>	African pygmy mouse	Least Concern	

Family	Biological Name	Common Name	IUCN Status
	<i>Pelomys fallax</i>	Creek groove-toothed swamp rat	Least Concern
	<i>Rhabdomys pumilio</i>	Four-striped grass mouse	Least Concern
SORICIDAE	<i>Crociodura cyanea</i>	Reddish-gray musk shrew	Least Concern
	<i>Crociodura hirta</i>	Lesser red musk shrew	Least Concern
	<i>Sylvisorex megalura</i>	Climbing shrew	Least Concern
HERPESTIDAE	<i>Galerella sanguinea</i>	Slender mongoose	Not Listed
	<i>Helogale parvula</i>	Common dwarf mongoose	Least Concern
MUSTELIDAE	<i>Ictonyx striatus</i>	Striped polecat	Least Concern
Bird Species			
	Biological Name	Common Name	IUCN Status
	<i>Acrocephalus schoenobaenus</i>	Sedge Warbler	Least Concern
	<i>Mirafra rufocinnamomea</i>	Flappet Lark	Least Concern
	<i>Hayon senegalensis</i>	Woodland Kingfisher	Not Listed
	<i>Corythornis cristatus</i>	Malachite Kingfisher	Least Concern
	<i>Dendrocygna bicolor</i>	Fulvous Whistling-Duck	Least Concern
	<i>Alopochen aegyptiaca</i>	Egyptian Goose	Least Concern
	<i>Apus affinis</i>	Little Swift	Least Concern
	<i>Ardea cinerea</i>	Grey Heron	Least Concern
	<i>Burhinus capensis</i>	Spotted Thick-knee	Least Concern
	<i>Vanellus coronatus</i>	Crowned Lapwing	Least Concern
	<i>Anastomus lamelligerus</i>	African Openbill	Least Concern
	<i>Cisticola lais</i>	Wailing Cisticola	Least Concern
	<i>Cisticola aberrans</i>	Rock-loving Cisticola	Least Concern
	<i>Cisticola natalensis</i>	Croaking Cisticola	Least Concern
	<i>Apalis thoracica</i>	Bar-throated Apalis	Least Concern
	<i>Cisticola fulvicapilla</i>	Piping Cisticola	Least Concern
	<i>Urocolius indicus</i>	Red-faced Mousebird	Least Concern
	<i>Streptopelia capicola</i>	Ring-necked Dove	Least Concern
	<i>Streptopelia semitorquata</i>	Red-eyed Dove	Least Concern
	<i>Coracias caudatus</i>	Lilac-breasted Roller	Least Concern
	<i>Centropus senegalensis</i>	Senegal Coucal	Least Concern
	<i>Chrysococcyx cupreus</i>	African Emerald Cuckoo	Least Concern
	<i>Dicrurus adsimilis</i>	Fork-tailed Drongo	Least Concern
	<i>Emberiza tahapisi</i>	Cinnamon-breasted Bunting	Least Concern
	<i>Estrilda astrild</i>	Common Waxbill	Least Concern
	<i>Uraeginthus angolensis</i>	Southern Cordonbleu	Least Concern
	<i>Serinus mennelli</i>	Black-eared Seedeater	Least Concern
	<i>Hirundo rustica</i>	Barn Swallow	Least Concern
	<i>Delichon urbicum</i>	Common House-Martin	Least Concern
	<i>Lanius collurio</i>	Red-backed Shrike	Least Concern
	<i>Lybius torquatus</i>	Black-collared Barbet	Least Concern

Biological Name	Common Name	IUCN Status
<i>Pogoniulus chrysoconus</i>	Yellow-fronted Tinkerbird	Least Concern
<i>Motacilla aguimp</i>	African Pied Wagtail	Least Concern
<i>Nectarinia famosa</i>	Malachite Sunbird	Least Concern
<i>Chaomitra senegalensis</i>	Scarlet-chested Sunbird	Not Listed
<i>Numida meleagris</i>	Helmeted Guineafowl	Least Concern
<i>Oriolus auratus</i>	African Golden Oriole	Least Concern
<i>Passer griseus</i>	Northern Grey-headed Sparrow	Least Concern
<i>Petronia superciliosa</i>	Yellow-throated Petronia	Least Concern
<i>Coturnix delegorguei</i>	Harlequin Quail	Least Concern
<i>Campethera abingoni</i>	Golden-tailed Woodpecker	Least Concern
<i>Batis molitor</i>	Chinspot Batis	Least Concern
<i>Ploceus ocularis</i>	Spectacled Weaver	Least Concern
<i>Ploceus cucullatus</i>	Village Weaver	Least Concern
<i>Euplectes orix</i>	Southern Red Bishop	Least Concern
<i>Euplectes albonotatus</i>	White-winged Widowbird	Least Concern
<i>Pycnonotus barbatus</i>	Common Bulbul	Least Concern
<i>Gallinula chloropus</i>	Eurasian Moorhen	Least Concern
<i>Crecopsis egregia</i>	African Crake	Least Concern
<i>Lamprotornis chalybaeus</i>	Greater Blue-eared Starling	Least Concern
<i>Cinnyricinclus leucogaster</i>	Violet-backed Starling	Least Concern
<i>Creatophora cinerea</i>	Wattled Starling	Least Concern
<i>Bostrychia hagedash</i>	Hadada Ibis	Least Concern
<i>Turdus libonyana</i>	Kurrichane Thrush	Least Concern
<i>Upupa epops africana</i>	African Hoopoe	Not Listed
<i>Zosterops senegalensis</i>	African Yellow White-eye	Least Concern

APPENDIX C

LIST OF STAKEHOLDERS CONSULTED

Title	First name	Last name	Company / Organisation
National Government			
Hon	Aggrey	Masi (MP)	Ministry of Natural Resources, Energy and Mining
Mr	A	Wona	Department of Mines
Mr	Chimwemwe Nelson	Bandazi	Department of Mines
Mr	Gift	Mwenye	Department of Mines
Mr	Tananga	Nyirenda	Environmental Affairs Department
Mr	Patrick	Nyirenda	Environmental Affairs Department
Mr	Nisile	Mwaisunga	Environmental Affairs Department
Ms	Cynthia	Chilima	Ministry of Land, Housing and Urban Development
Ms	Mercy	Duwe	Ministry of Lands
Mr	Dary	Shilonga	Department of Lands and Valuation
Dr	E	Chitsa Banda	Central West Zone Manager
Dr	Jane	Namasasu	Central East Zone Manager
Mr	Alfred	Topeka	Department of Antiquities
Mr	Moses	Mkumpha	Department of Antiquities
Mr	Kelvin	Mphonda	Roads Department
	Werani	Chilenga	Chairperson of Parliamentary Committee on Natural Resources and Environment (PCNRE)
Hon	Peter	Dimba	Member of Parliament: Malingunde
District Government			
Mr	Herbert C	Bolokenya	Lilongwe District Council
Mr	Biswick	Mlaviwa	Lilongwe District Council
Mr	James L	Mwenda	Lilongwe District Council
Mr	Douglas	Moffat	Lilongwe District Council
Mr	Lawford	Palani	Lilongwe District Council
Ms	Sarah	Kandapo	Lilongwe District Council
Mr	Joseph	Banda	Lilongwe District Council
Ms	Patience	Jimu	Lilongwe District Council
Ms	Gloria	Jeremiah	Lilongwe District Council
Mr	Charles	Kalemba	Lilongwe District Assembly (DA)
Mr	Samson	Chaziya	Lilongwe District Council
Mr	Halima	Issat	Lilongwe District Council
Ms	Loveness	Banda	Lilongwe District Council
Local Government			
Mr	Desmond	Bikoko	Lilongwe City Council
Parastatals			
Mr	Charles	Kachingwe	Lilongwe Water Board
Mr	Mavuto	Chintengo	Lilongwe Water Board
Mr	Bester	Kamwaza	Lilongwe Water Board
Mr	Oswald	Mathamay	National Water Resource Authority (NWRA)
Dr	Alexon	Chiwaya	Escom
Mr John	Ng'ambi		Malawi Roads Authority (RA)
Traditional Authorities / Village Leaders			
TA		Masumbankhunda	
Mr	SGVH	Tanga	Village Tanga

Title	First name	Last name	Company / Organisation
Mr	GVH	Chitsulo	Village Chitsulo
Mr	GVH	Pingeni	Village Pingeni
Rev	LMN	Hara	Malingunde CCAP (Church of Central Africa Presbyterian) Mission
Mr	GVH	Nyundo	Village Nyundo
Mr	SGVH	Msungira	Village Msungira
Mr	Jelard	Belemon	Chair: ADC (Area Development Committee)
Mr	VH	Katawa	Village Mfumu
Mr	VH	Jualani	Village Mfumu
Mr	Luka	Mwandira	Clerk: ADC
Mr	VA	Mbonkekla	Village Mfumu
Mr	NH	Rumalendi	Village Mfumu
Mr	VH	Kumalindi Wafupi	Village Mfumu
Mr	VH	Kumalindi Wantaki	Village Mfumu
Mr	VH	Nyozani	Village Mfumu
Ms	Lambetsani	Solomoni	ADC Member
Ms	Cathren	Kabango	ADC Vice Chair
Mr	Hardwell	Kachule	Village Development Committee (VDC)
Ms	Tione	Mphatso	VDC Vice Chair
Ms	Verentina	Chapata	VDC
Ms	Elube	Mphambawire	VDC Chair
Mr	Everson	Chiku	VDC Member
NGOs / CBOs / Funders			
Ms	Rachel	Etter-Phoya	Citizens for Justice
Mr	Moses	Makandawire	Publish What You Pay (PWYP)
Mr	Paul	Mvula	Publish What You Pay (PWYP)
Mr	Elyvin	Nkhonjera Chawinga	Oxfam Malawi
Mr	William	Chadza	Centre for Environmental Policy and Advocacy (CEPA)
Ms	Cynthia	Simkonda	Centre for Environmental Policy and Advocacy (CEPA)
Mr	Kossam	Munthali	Natural Resource Justice Network (NRJN) and FOCUS - Foundation for Community Support Services
Mr	Kennedy	Rashid	Natural Resource Justice Network (NRJN) and Institute for Policy Interaction
Mr	Peter	Panjani	Action Aid Malawi
Mr	Chisomo	Manthalu	Action Aid Malawi
Mr	Martin	Chiphwanya	Catholic Commission for Justice and Peace (CCJP)
Mr	Angess	Mpoto	Catholic Commission for Justice and Peace (CCJP)
Mr	Cullen	Hughes	US AID Malawi
Mr	Stein	Villumstad	Norwegian Church Aid
Mr	Thokozani	Mapemba	Norwegian Church Aid
Mr	Timothy	Mtambo	Centre for Human Rights and Rehabilitation (CHRR)

Title	First name	Last name	Company / Organisation
			Citizens for Justice
			Council for NGOs in Malawi (CONGOMA)
			Malawi Environmental Endowment Trust
			Wildlife and Environment Society Malawi (Lilongwe Branch)
			Malawi Extractives Industry Initiative (Mweiti)
Mr	Billy	Mayaya	Human Rights Activist
Mr	Matthews	Malata	Association for Environmental Journalists
Mr	Charles	Mkoka	AEJ and Ecosystems Partners and Communications
Mr	Felix	Liwje	Institute for Community Mobilisation and Empowerment (I-COME)
Ms	Leneni	Nyasulu	Institute for Community Mobilisation and Empowerment (I-COME)
Mr	Eddie	Kalonga	Friends of Malingunde (Official Spokesperson)
Mr	Maxwell	Mphoyo	Friends of Malingunde: Social Welfare Chairman
Mr	Maxwell	Chaonekera	Friends of Malingunde
Mr	Harry	Dzowera	Friends of Malingunde
Mr	Clement	Zindondo	Friends of Malingunde
Mr	MeStraford	Zindondo	Friends of Malingunde
Mr	Jones	Malili	Friends of Malingunde
Mr	Howard	Bowa	Friends of Malingunde: Board Member of Trustees
Mr	Nedi	Chonde	Friends of Malingunde
Mr	Lawrence	Ngwira	Friends of Malingunde
Media			
Mr	Madalitso	Musa	Daily Times
Mr	Mabvuto	Banda	Daily Times
Mr	Ephraim	Munthali	The Nation (Daily Newspaper)
Mr	Aubrey	Mchulu	The Nation (Daily Newspaper)
Mr	Suzgo	Chitete	The Nation (Sunday)
Mr	Enala	Banda	The Nation (Daily Newspaper)
Mr	Chikondi	Kwanjana	The Nation (Daily Newspaper)
			Malawi's Mining & Trade Review
			Zodiak Radio Station and TV
			Malawi News Agency (MANA) Headquarters
			Nyasa Times
			Maravi Post
			Malawi24
			Channel for All Nations TV
			Investor Magazine
			Malawi Broadcasting Corporation
			Maziko Radio Station

Title	First name	Last name	Company / Organisation
			Timveni Radio
			MISA Malawi
			Association of Environmental Journalists Malawi
			Nyika Press Club
Mr	Marcel	Chimwala	Mining Review
Ms		Chimwemwe	
Commerce, industry and others			
Mr	Dean	Lungu	Chamber of Mines and Energy
Ms	Dina	Longwe	Chamber of Mines and Energy
Mr	Grain	Malunga	Coordinator for Malawi Chamber of Mines
Mr	Chancellor	Kaferapanjira	Malawi Confederation of Chambers of Commerce and Industry (MCCCI)
Prof	Kenneth	Wiyo	Lilongwe University of Agriculture and Natural Resources (LUANA)
			Nyasa Mining Cooperative Society Limited

APPENDIX D

BACKGROUND INFORMATION DOCUMENT

BACKGROUND INFORMATION DOCUMENT

Environmental and Social Impact Assessment (ESIA)

December 2017

Malingunde Graphite Project, Lilongwe District, Malawi



Purpose of this document

This document provides information about the environmental and social impact assessment (ESIA) which is being undertaken in respect of the proposed Malingunde Graphite Project, southwest of Lilongwe Boma in Malawi. You are requested to read through this document carefully as it provides important information relating to:

- The location of the proposed Project,
- The ESIA process to be followed to obtain environmental authorisation, and
- The stakeholder engagement process that will be undertaken during the ESIA.

Comments, concerns and questions can be directed to:

AECOM (Public Participation Office): Anelle Lotter, Email: anelle@jaws.co.za

C12 (Local consultant): Dorothy Mbendela, Email: admin@ctwelve.org, Tel: +265 998 521 663/+265 881 409 466

During the ESIA project, please visit <http://sovereignmetals.com.au/building-malingunde/> for any project related documents. This Background Information Document, scoping report and ESIA report will be made available on this website.

Introduction and background

Sovereign Metals Limited (Sovereign) is currently conducting a number of technical studies, which will culminate in a feasibility study, to determine the viability of developing the natural flake graphite deposit at Malingunde (the Project) in central Malawi, 15 km southwest of Lilongwe Boma. Studies undertaken to date indicate that the resource can yield approximately 44,000 tonnes of graphite concentrate per annum over an initial life-of-mine (LOM) of 17 years.

Should the feasibility studies prove that mining is viable, and a decision is taken by Sovereign to proceed with the development of the mine, an application for a mining licence will be submitted to the Department of Mines. In addition, environmental authorisation from the Environmental Affairs Department (EAD) will be required in terms of the Environment Management Act (EMA), 1996 before development of the Project can proceed.

Due to the nature and scale of the proposed activities the EAD requires that an ESIA be undertaken before any construction activities can begin. The ESIA is being undertaken in compliance with Malawian legislation and international good practice and standards, particularly those detailed in the International Finance Corporation (IFC) Performance Standards and the Equator Principles.

Sovereign aims to complete all studies towards the end of 2018 to enable them to decide on whether the mine will be developed or not in early 2019.

Who is McCourt Mining and Sovereign Metals?

McCourt Mining is a wholly owned subsidiary of Sovereign Metals Limited (Sovereign), an Australian publicly listed company. Sovereign acquired McCourt in September 2012. McCourt is the licence holder of the Exclusive Prospecting Licence EPL0372 over an area of approximately 1,245 km² on the Lilongwe Plain in which the proposed Malingunde Project is located. McCourt is also the applicant for the environmental authorisation for the Project.

Malingunde Project Location

The proposed project is located approximately 15 km southwest of Malawi's capital city of Lilongwe, and falls within the Lilongwe District of the Central Administrative Region. Access to the proposed mine from Lilongwe is via the sealed section of the secondary road, S124, to Likuni and then the unsealed continuation of the S124 to the Kamuzu Dam turn-off. Access around the proposed mine site is via a network of unsealed roads and tracks. The proposed mine site is approximately 25 km from operating rail, 20 km from a major power sub-station and near potential water sources. The Project area will be approximately 300 – 400 hectares in size.

Proposed Malingunde project activities

Open pit mining with traditional excavator and haul trucks will be used to mine the ore. No drilling and blasting activities will be required for the operation as the material is relatively soft and suitable for free digging. Mining will be undertaken in shallow open pits, with maximum depths of 25 m and maximum widths of approximately 150 m. Once excavated, the ore will be loaded onto 40 tonne trucks and hauled from the pit to either the processing plant or, if it is waste material, to the waste rock dumps. After treating the ore in the plant (scrubbing and flotation) the tailings material will be pumped to the tailings storage facility site for final disposal. The processed product will be transported on flatbed trucks by road over approximately 26 km to the Kanengo train station north of Lilongwe Boma, from where it will be sent by rail to the port of Nacala in Mozambique for export.

The infrastructure on the mine site is likely to include:

- A number of long, shallow open pits, trending in a northwest–southeast direction.
- A tailings storage facility (TSF).
- A waste rock dump (WRD).
- A low grade stockpile.
- An ore processing plant.
- Site roads providing access to the pits, processing plant and administration buildings.
- Raw water storage dam, process water storage dam, site water management infrastructure and dirty water storage dams.
- Workshops to service and maintain mining fleet and equipment.
- Diesel fuel storage and filling stations for mine fleet and light vehicles.
- Administration buildings, offices, ablution facilities and crib rooms.

A number of options are being investigated as part of the current pre-feasibility study, including different locations for the TSF, WRD and plant site. It is planned as far as possible to locate the TSF, processing plant, workshops and other infrastructure to the northern extent of the project area outside of the Kamuzu II Reservoir watershed to minimise potential contamination issues. The locations for the proposed infrastructure components as well as the various mining schedules being considered will have different technical requirements, as well as varying environmental and social impacts, and the preferred mining option will only be selected after all the options have been considered in detail.

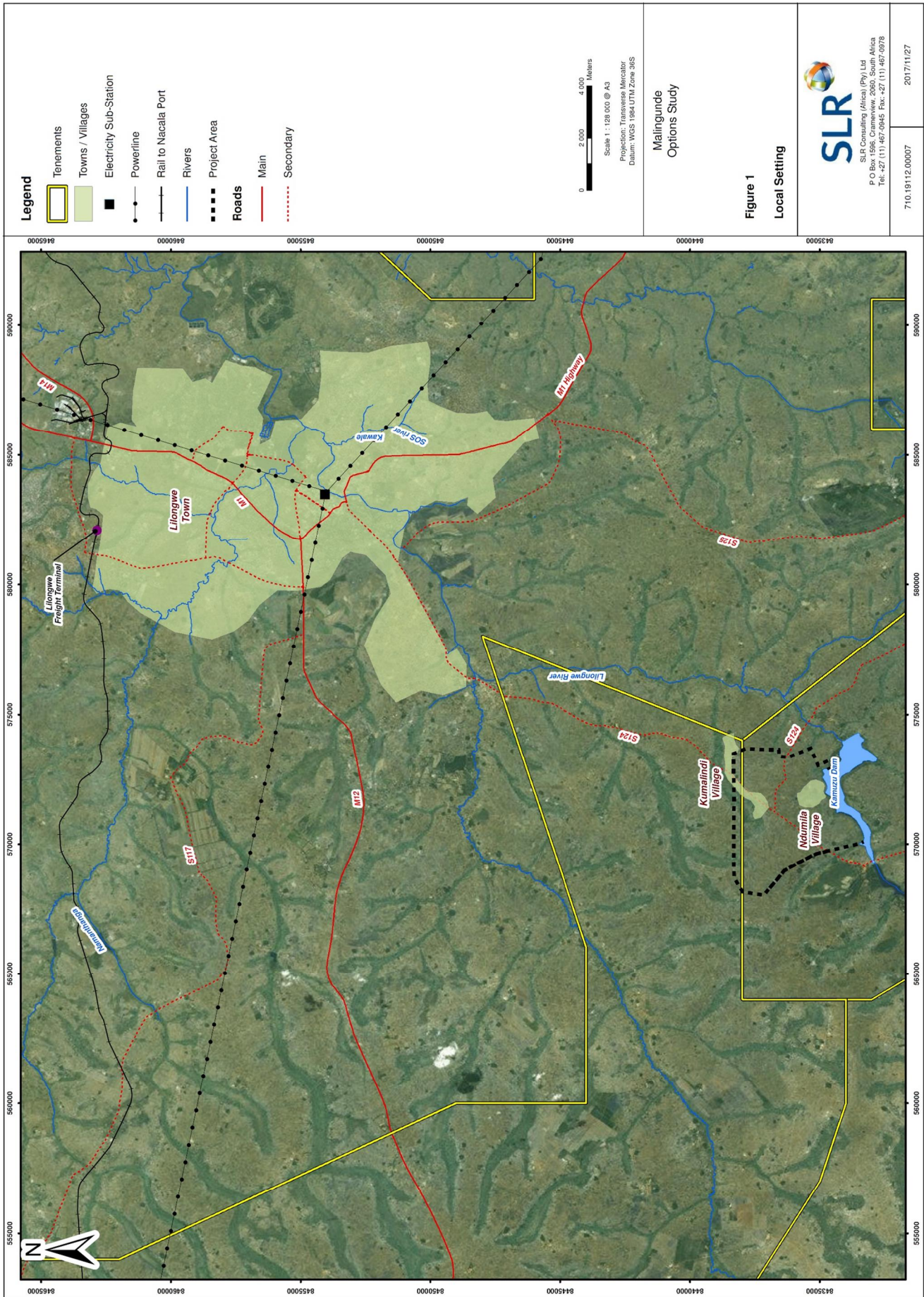


Figure 1: Malingunde Project Location

What is graphite used for?

The primary end-market for flake (or crystalline) graphite is the refractory, foundries and crucible sector which consumed approximately 616 000 tonnes of flake graphite production in 2016. The majority of flake graphite is used to produce magnesia-carbon bricks used in the steel industry. A growing use of graphite is in the production of rechargeable lithium-ion batteries for laptops, cell phones, etc. Additionally, substantial increase in demand for graphite is expected in the future for the growing electric vehicles market.

What is an ESIA all about?

An ESIA is a legal requirement for any project prescribed under Section 24(1) of the Environmental Management Act (EMA). The Environmental Impact Assessment Guidelines (1997) published by the EAD identify projects for which an ESIA are mandatory in 'List A' of the guidelines, which includes mining of minerals. McCourt will therefore be applying for environmental authorisation in respect of potential mining activities at Malingunde.

The main objectives of the ESIA are to identify and assess likely environmental and social impacts, and propose appropriate mitigation and management measures, as well as monitoring protocols.

Specifically, the ESIA will:

- Define the existing social, cultural, economic and environmental conditions within the project area.
- Review feasible project alternatives.
- Ensure social and environmental considerations and potential impacts are explicitly addressed and incorporated into the project design and implementation process.
- Assess the potential environmental and social impacts associated with the project.
- Identify mitigation measures that are both practical and feasible to avoid or minimise the potential impacts of the project, and to enhance the beneficial outcomes of the project for the communities within the area.
- Identify relevant monitoring protocols to ensure the mitigation and management measures are implemented effectively.

The ESIA process is generally undertaken in three phases, namely compilation of the project brief, environmental scoping and ESIA phases. The project brief has been submitted to the EAD and the environmental scoping phase has now commenced.



Figure 2: The phases of the ESIA process, proposed timeline of the phases and the main activities to be undertaken in each phase.

Scoping Phase:

The main aim of the environmental scoping phase is to identify potential environmental and social issues that require detailed investigation and assessment by a range of specialists in the ESIA phase, as well as develop the terms of reference (ToR) for undertaking these investigations. The conclusion of the scoping phase is the submission of an environmental scoping report to the EAD for their review. Before the submission of the scoping report to the EAD, a draft scoping report will be made available to stakeholders for their review and comments. A key component of the scoping phase is to engage stakeholders to provide them with project information and identify issues and concerns of importance to them. This document is part of the process to provide stakeholders with information so that they can participate by asking questions and raising concerns.

A draft scoping report for the proposed project will be available at the beginning of March 2018 and meetings with stakeholders will be held shortly thereafter to present the report and receive stakeholder comments. These meetings will be advertised, and stakeholders will receive notice of where and how they can obtain a copy of the draft scoping report.

ESIA Phase:

After the completion of the scoping phase, a range of specialists will conduct their assessments and the findings of their work will be documented and a draft ESIA report will be available for stakeholder review. It is planned to make the report available for stakeholder review towards the end of August 2018. Meetings will again be held to share the specialist findings and to obtain stakeholder comments. After the finalisation of the ESIA report, the report will be submitted to the EAD for their review and approval. Notice of the proposed activities in this phase will be provided to stakeholders.

Specialist investigations:

Specialist studies will be undertaken to determine the status of the existing environment and to evaluate the potential impacts of the Project on the natural and social environment, include assessments of the flora (plants), terrestrial and aquatic fauna (animals and fish), wetlands, surface water, groundwater, air quality, noise, vibration, visual impact, archaeology and cultural heritage, and social impacts. A resettlement study will also be conducted.



Figure 3: Specialists will assess plants, birds, wetlands, animals, soil, cultural heritage and all the other aspects that may potentially be impacted by the proposed Malingunde mine project.

Impacts:

The Malingunde Project is likely to have a range of impacts on the environment and the people living in the area. Developments of this nature often contribute to creation of job opportunities, growth in the economy, improved infrastructure and social development. With the positive impacts, some negative impacts may also be experienced. Some people may lose farmland or may have to be resettled, and the project may have result in changes in the quality and quantity of water, levels of dust experienced, disturbance of vegetation and animals, and changes in noise and traffic levels may be experienced. The specialists will investigate these impacts and develop measures and plans to manage the impacts are minimised.

Your comments are important

Your comments will ensure that all relevant issues are evaluated in the specialist assessments conducted during the ESIA. Please provide your comments at the meetings to be held during March and September 2018 to any AECOM and C12 personnel listed on page 1. Please complete the attached comment form, write a letter, call or email the public participation office. Comments can also be posted to PO Box 30523, CC3, Lilongwe, Malawi.

REGISTRATION AND COMMENT FORM



Please complete this form and return it to AECOM or C12 before 15 February 2018. By answering the questions below you will help us to develop a better understanding of your information requirements and concerns regarding the proposed project. Additional pages may be attached to the registration form should this be required.

Personal information			
First Name and Surname			
Please indicate whether you are registering as a Community / Organisation / Farm or Business and provide the name:			
Address (postal or physical):			
Telephone:		Cell:	
Email:			
General interest in the project			
Do you have any specific comments regarding the proposed development of the Malingunde Project?			
Do you have any specific concerns associated with this project (for example water, soil, pollution, cultural)?			
If you know of anyone who should be informed about the project, please provide their contact details:			
First Name and Surname:			
Community / Organisation / Farm:			
Address:			
		Telephone:	
		Fax:	
		Cell:	
		Email:	

Ka bukhu ka Ndongomeko ya Kafukufuku wa momwe nchito ya M'godi omwe ungasatsegulidwe ku Malingunde ungasakhudzile chikhalidwe cha anthu komanso za chilengedwe m'delalo

December 2017

Ntchito ya M'godi wa miyala ya mtengo wa patali m'boma la,



Lilongwe ku Malawi



Cholinga cha ka bukhu

Ka bukhu kakufotokozeka mwa tsatanetsatane za mmene idzayendere ntchito ya kafukufuku wa momwe mchito ya M'godi omwe ungasakhazikitsidwe ku Malingunde, m'boma la Lilongwe ungasakhudzile chikhalidwe cha anthu komanso za chilengedwe. Chonde werengani bwino lomwe ka bukhu kuti mumvetsetse bwino za izi:

- Za malo omwe ntchito ya M'godi adzachitikire,
- Ndongomeko ya kafukufuku yemwe adzapangidwa chilolezo chopitira pa tsogolo ndi nchitoyi chisanaperekedwe,
- Misonkhano yomwe idzachitika pofuna kumva maganizo a onse omwe adzakhudzidwa ndi ntchitoyi.

Maganizo, nkhwana komanso mafunso onse okhudza nkhanayi aperekedwe kwa antu awa ku keyala iyi:

AECOM (Public Participation Office): Anelle Lotter, Email: anelle@jaws.co.za

C12 Consultants (Local consultant): Dorothy Mbendela, Email: admin@ctwelve.org, Tel: +265 998 521 663/+265 881 409 466

Pa nthawi ya kafukufuluyu mungathenso kupeza zolembedwa zina zokhudza kafukufukuyu pa intanet iyi:
<http://sovereignmetals.com.au/building-malingunde/>. Mudzatha kupeza zonse zokhudza ntchitoyi komanso ma repoti onse pamenepa.

Kampan ya Sovereign Metals Limited (Sovereign) ili pa kalililiki kupanga akafukufuku osiyanasiyana omwe adzathandiza kudziwa ngati kungakhale kotheka komanso kopindulitsa kuyamba nthito ya M'godi wa miyala ya mtengo wa patali yomwe pa chingerezi imatchedwa Graphite ku Malingunde ku vuma kwa boma la Lilongwe. Kafukufuku yemwe adachitika kale pa malopa adasonyeza kuti pa malowa pakhoza kumapezeka miyala ya nkhaninkhani (44 000 tonnes) pa chaka kwa zaka zoyamba za nchitoyi zokwanila khumi, zisanu ndi ziwiri (17 years).

Ngati kudzapezeka kuti ntchitoyi ikhoza kugwirika bwino bwino popanda chovuta komanso mopindulitsa, bungwe la Sovereign lidzapempha chilolezo chotsegulira M'godi kuchokera ku nthambi ya boma yoyang; anira za Migodi ya miyala ya mtengo wa patali mdziko muno. Kuphatikiza apo, bungweli lidzapemphanso chilolezo kuchokera ku nthambi yoyang'anira za chilengedwe molingana ndi Malamulo omwe adakhazikitsidwa ndi boma mchaka cha 1996 omwe amanena kuti payenera kuchitika kafukufuku oona momwe nchito za migodi kapena chitukuko chilli chonse chingakhudzire chikhalidwe cha anthu kapena za chilengedwe, nchitozi zisanayambike.

Bungwe la Sovereign likufunitsitsa kuti zonse zokhudza kafukufuku wa nkhanayi atachitika pakutha pa chaka cha mawa (2018) kuti potero lithe kupanga chiganizo choyambitsa nthito ya M'godi kapena ayi kumayambiro a chaka cha 2019.

Kodi a McCourt Mining and Sovereign Metals ndi ndani?

Kampani ya McCourt Mining ndi nthambi kwa thunthu ya kampani ya Sovereign Metals Limited (Sovereign), yovomelezeka bwino lomwe mdziko la Australia. Bungwe la Sovereign lidagula kampani ya McCourt mu September chaka cha 2012. Pakadalipano kampani ya McCourt ili ndi chilolezo chokhala mwini wa malo okwana pafupifupi 1,245 km² mu chigwa cha boma la Lilongwe ku Malingunde. Pa malowa ndi pomwe pangadzakhale nchito ya M'godi wa miyala ya mtengo wa pataliya Graphite ngati zonse zofufuza zitalozera kuti nkotheke kukhazikitsa mg'odiwu. Kampani ya MacCourt ndi yomwensu yapempha chilolezo chogwira nchito za m'godiwu kuchokera ku nthambi ya boma yoona za chilengedwe.

Malo omwe kungadzakhale M'godi ku Malingunde

Ntchito ya Mg'odi yomwe ingadzachitike ikuyembekezeka kudzakhala ku Malingunde, malo omwe ali pa ma mtunda wa ma kilomita 15 ku vuma kwa mzinda wa Lilongwe. Malowa angafikidwe podzera ku Likuni molunjika ku Kamuzu Dam. Misewu ya ku maloku ndi yopanda phula komanso pena pamafika poyenda mu timikwaso. Malo omwe Mg'odiwu ungadzakhale ali pa mtunda otalika makilomita 25 njanji yomwe pakadali pano ikugwira nchito. Malowa alinso pa mtunda wa makilomita pafupifupi 20 kuchokera pa malo pomwe pali mphamvu yogawa magetsi ndipo ali pafupi ndi malo omwe pangapezeke madzi. Malowa adzakhala okula pakati pa ma hekitala 300 ndi 400.

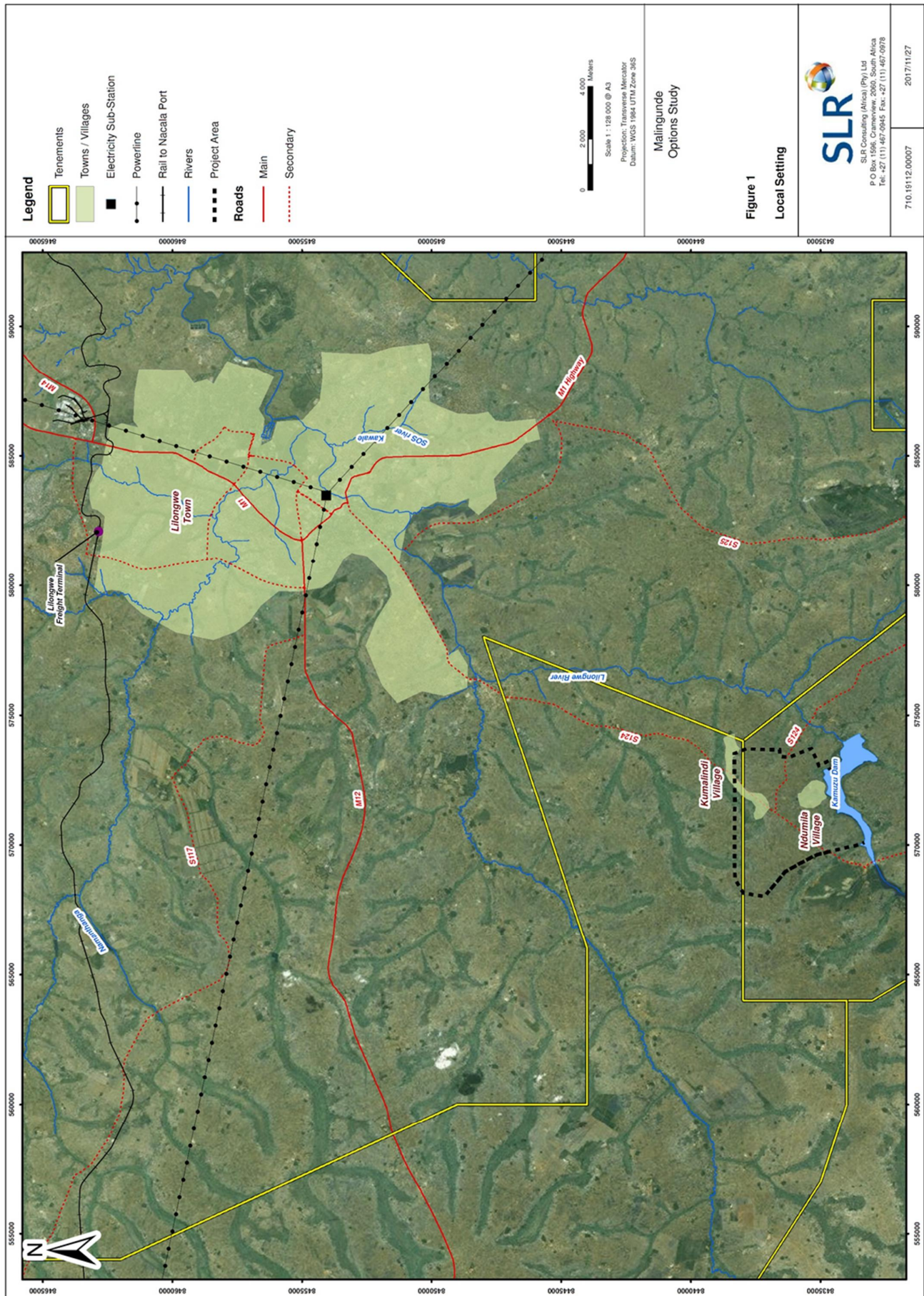
Ntchito zomwe zingadzagwilidwe ngati Mg'odiwu utadzatzegulidwa

Ntchito idzagwilidwa pokumba mayenje ndi ma trakitala komanso magalimoto onyamula dothi. Pa malopa sipadzakhala kuboola miyala ndi cholinga chophulitsa ma bomba. Izi sizidzafunika chifukwa malowa ndi ofewa ndipo osavuta kukumba ndi ma trakitala. Mayenje akuyembekezereka kudzakhala osadutsa mulingo wa ma mita 25 kuya kwake komanso osadutsa ma mita okwana 150 mu lifupi ndi mu litali mwake. Miyala yokumbidwa idzidzanyamulidwa mma galimoto onyamula katundu olemera kwambiri (40 tonne) kupita nayo ku malo omwe imakakonzedwa bwino kapena kutayidwa, ngati miyala ya mtengo wa patali yatengedwamo kale. Pamene miyalayi yasamalidwa bwino lomwe zinyatsi zonse zidzatengedwa ndi kukataidwa kumalo omwe adzakonzedwa mosamala komanso mwa ukatswiri kuti ndiko kotaya zinyalalazi. Miyala ya mtengo wa apatali yokha ndiyo idzanyamulidwa pa magalimoto ena ulendo opita ku Kanengo komwe idzanyamulidwa pa sitima ya pa njanje, kupita nayo ku doko ka Nacala ku Mozambique pa ulendo opita ku misika ya kunja.

Zinthu izi zikuyembekezereka kudzapezeka pa Mg'odiwu:

- Malo otayako zinyalala monga madzi oipa zochokera mu fakitare yotsukira, kupukuta ndi kusankha miyala.
- Malo otaya miyala yomwe ndi yosafunika.
- Malo osungila miyala yosakhala ndi miyala ya mtengo wa patali yambiri.
- Makina otsukira, kusamalilira ndi kusankha miyala yokumbidwa.
- Misewu yopitila ku mayenje okumbako miyala komanso ku malo komwe kudzakhala makina komanso ma ofesi osiyanasiyana.
- Malo osungilamo madzi ogwilitsa ntchito zosiyanasiyana.
- Nyumba kapena kuti garaja yokonzeramo ma galimoto ndi katundu wina wa pa Mg'odi.
- Malo osungiramo mafuta a dizilo kapena petulo.
- Mdadada wa nyumba yomwe mudzakhala ma ofesi osiyanasiyana.

Pakadali pano, ngati mbali imodzi ya kafukufuku, malo angapo akuganizilidwa kuti ndiwo pangadzakhale fakitale, maofesi kapena kotayako zinyalala cha kutali ndi malo omwe pali malo omwe kuli Kamuzu Dam. Pali maganizo oti malo otaya zinyatsi zochokera mu m'godi, malo osungirako miyala komanso fakitale ya pa m'godipa zidzakhale cha kumpoto kwa malowa komwe ndi kutali ndi damu la Kamuzu lomwe kumachokera madzi akumwa mu mzinda wa Lilongwe. Izi zidzadzathandiza kuti madzi ochokera ku m'godiwu asadzasakanikirane ndi madzi a pa damuli.



Chithunzi choyamba1: Kusonyeza Malo omwe M'godi Ungadzakhazikitsidwe ku Malingunde

Zochitika zosiyanasiyana za pa Mg’odi ukuyembekezedwawu zidzakhala ndi chiposezo pa chikhalidwe cha anthu kapena chilengedwe mulingo cha mulingo osiyanasiyana. Ichi ndi chifukwa chake padzafunika kudikira kuti kafukufuku achitike ndi kumalizidwa bwino lomwe njira yen yen yoyendetsera Mg’odiwu kapena ya kamangidwe ka zofunika pa ntchitoyi isanasankhidwe.

Kodi miyala ya mtengo wa patali ya Grafaiti (Graphite) imagwiritsidwa ntchito yanji?

Miyala ya Grafaiti imagwilitsidwa ntchito kwambiri mma fakitale akuluakulu omwe amapanga zitsulo. Mwachitsanzo mnchaka cha 2016 chokha ma fakitarewa anagwilitsa nthito miyala ya Grafaiti yolema ma tani 616 000. Makono, miyala ya Grafaiti ikugwilitsidwa ntchito popangira ma battery a ma foni a mmanja. Palinso chiyembekezo choti msika wa miyalayi ukula kwambiri malinga ndi kukulanso kwa msika wa ma galimoto oyendera magetsi omwenso amafuna ma battery oti atha kutchajidwa ngati a ma foni a mmanja.

Kodi Kafukufuku wa za chikhalidwe ndi Chilengedwe amakhudza chiyani?

Malamulo amanena kuti nchito ili yonse ya chitukuko isanachitike, payenera kuchitika kafukufuku ofuna kuunika momwe ntchitoyo ingakhudze miyoyo ya anthu, chikhalidwe chawo komanso za chilengedwe monga nyama ndi zomera ku derako. Kuno ku Malawi, Malamulowa a li mu ndime 24 gawo loyamba la Malamulo a kasamalidwe ka Zachilengedwe.

Mmalumulowa muli ndondomeko zonse zofunika kutsatidwa ndipo kafukufukunso ndi ofunika ntchoto ili yonse ya Migodi isanayambe. Molingana ndi ndondomeko zimenzi, kampani ya McCourt idzapempha chilolezo ndikusata ndondomeko zonse zofunika isanayambe ntchito za M’godi ku Malingunde.

Cholinga chachikulu cha kafukufukuyu ndi kufuna kuunika momwe ntchitoyi ingadzakhudze chikhalidwe cha anthu komanso za chilengedwe m’derali komanso kuika ndondomeko zothandiza ndikuonetsetsa kuti miyoyo kapena chikhalidwe cha anthu kapena za chilengedwe zisaonongeke. Kafukufukuyunso adzandiza kuonetsetsa kuti ndondomeko zoikikazi zikutsatidwa bwino lomwe. Mwa chindunji, kafukufukuyu adzaunika izi:

- Kufufuza ndi kuona za chikhalidwe cha anthu, momwe amayendetsera ntchito zawo za chuma komanso kuona kuona momwe chilengedwe chilili m’deramo.
- Kuunika njira za bwino za momwe ntchitoyi ingagwilidwire m’derali ndikusankha njira yomwe ingakhale ya bwino kwambiri.
- Kuonetsetsa kuti mavuto omwe ntchito ya mg’odiyi ingabweretse pa miyoyo ya anthu komanso pa za chilengewe m’derali zatchulidwa mosabisa ndiponso kuti ndondomeko zothandiza kuthana ndi mavutowa zaikidwa mu ndondomeko zoyendetsera ntchito zonse za m’godiwu.
- Kuunika bwino lomwe za ma vuto omwe angakhalepo pa miyoyo ndi chikhalidwe cha anthu komanso pa za chilengedwe.
- Kupeza njira zomwe ndi zotheka pothandiza kuchepetsa mavuto omwe angadze chifukwa cha nchito za m’godiwu komanso kuunika za phindu lomwe anthu okhala ku dera komwe kungadzakhale m’godiwu angapeze kupyolera mu ntchito za m’godiwu.
- Kupeza njira za bwino zothandiza kuti kalondolondo wa ndondomeko zothandiza kuti ntchito za m’godiwu zisadzetze mavuto akuyenda bwino.

Kafukufukuyu amachitika mmagawo atatu. Gawo loyamba, kulemba tsatanetsatane wa mmene ntchito yonse idzayendera, gawo la chiwiri, kuunika za chilengedwe zosiyanasiyana zopezeka ku dera komwe ntchito ingadzagwilidwe komanso gawo lachitatu lomwe ndi kafukufuku ounika za momwe nthito yomwe idzakhagwilidwe ingadzakhudze miyoyo kapena chikhalidwe cha anthu komanso za chilengedwe. Ndongomeko ya mmene nthito yomwe ingadzagwilidwe itadzayendere inaperekedwa kale kunthambi ya boma ya EAD. Pakadali pano nchito ya kauniuni wa za chilengedwe zopezeka ku derali idayambika.

Ndondomeko ya Ntchito yodzagwilidwa

(June 2017)

- Ntchitoyi idachitika kale ndipo idasonyeza kuti kafukufuku ounika za momwe ntchitoyi ingadzakhudzire miyoyo ya anthu kapena chikhalidwe cha anthu komanso za chilengedwe idzafunika.

Kuunika za chilengedwe

(December 2017 mpaka March 2018)

- Kulengeza za ntchito yi (kabukhu aka kadzagawidwa pa misonkhano ina yokambirana za nkhanayi.
- Ripoti yoyamba ya kafukufuku wa mmene ntchito ya m'godi yomwe ingadzakhazikitsidwe ingadzakhudzire miyoyo kapena chikhalidwe cha anthu komanso za chilengedwe idzatulutsidwa mu mwezi wa Marichi chaka cha 2018.
- Misonkhano yokumanana ndi onse okhudzidwa ndi nkhanayi idzachitika ku mayambiro a chaka cha mawa , mu mwezi wa Marichi 2018.
- Repoti yomaliza ya kafukufuku lidzaperekedwa ku nthambi ya boma yoona za Chilengedwe (EAD) kuti nawo aiwerenge ndikuika maganizo awo.

Kafukufuku

(April mpaka September 2018)

- Kafukufuku opangidwa ndi wa akatswili osiyanasiyana.
- Repoti loyamba la kafukufuku lidzatuluka mu Spitembala 2018.
- Misonkhano ndi onse okhudzidwa kapena kutengapo mbali pa ntchitoyi idzapangika kumayambiro kwa mwezi wa Sepitembala.
- Repoti lomaliza la kafukufuku lidzaperekedwa ku nthambi ya boma yoona za chilengedwe ya EAD.

Chojambula chachiwiri: Kusonyeza ndondomeko ya kafufuku ndi zonse zomwe zidzachitike mmagawo onse a kafukufukuyu.

Kauniuni wa za chilengedwe:

Cholinga chachikulu cha gawo ili ndikusanthula kapena kuunika zinthu za chikhalidwe kapena za umoyo wa anthu komanso za chilengedwe zomwe zingakhudzike kwambiri ndi ntchito yomwe ingabwere. Izi zikachitika, ndondomeko zimaikidwa zofuna kuunika mozama gawo lili lonse la magawo omwe angakhudzidwewo. Pa mapeto pa zonse ripoti lake limaperekedwa kwa onse okhudzidwa kapena kutengapo mbali pa ntchitoyi kuti nawonso aikemo maganizo awo ripotiyi isanaperekedwe ku nthambi ya boma yoona za chilengedwe. Izi zimachitika kupatsa mwayi onse okhudzidwa kapena kutengapo mbali kuti adziwe zomwe kafukufuku adapeza komanso kuti nawo atengepo gawo pofunsa mafunso kapena kuikapo ndemanga pa zomwe kafukufuku wapeza.

Ripoti loyamba la ntchito younika zomwe za kauniuni ameneyu lidzatuluka mwezi wa Malichi mu chaka cha 2018 ndipo misonkhano yolongosolera anthu za repotiyi komanso kumva maganizo awo idzachitika potsatira kutuluka kwa repotiyi. Misonkhanoyi idzalengezedwa bwino lomwe, kudziwitsa anthu za malo omwe idzachitikire komanso momwe angapezere repoti la kaunuuni oyambayo.

Gawo la Kafukufuku:

Likadzatha gawo la kauniuni oyamba akatswiri osiyanasiyana adzapanga akafukufuku malinga ndi ukadaulo wawo ndipo zotsatira za akafukufuku amenewa zidzaikidwa pamodzi kuti zikhale mbali ya repoti yaikulu ya kafukufuku yense okhudza ntchito yomwe ingadzachitikeyo. Ripotiyi idzatulutsidwa kumapeto kwa mwezi wa Ogasiti 2018. ndipo onse okhudzidwa kapena kutengapo gawo pa nkhanayi adzakhala ndi mwayi owerenga ndipo lidzaperekedwanso ku nthambi ya boma yoona za chilengedwe ya EAD.

Kafukufuku wa akatswiri osiyanasiyana:

Akatswili osiyanasiyana pa nkhani za chilengdwe adzapanga akafukufuku ofuna kuona za mmene chilengedwe chilili pakadali pano ku malowa komanso kuunika za momwe ntchito yomwe ingadzakhazikitsidwe ingadzakhudzire za chilengedwe. Atswiriwa ndi monga oona za zomera, nyama zoyenda pa mtunda komanso zokhala mmadzi monga nsomba, oona za ma dambo, madzi a mzikha komanso opezeka panso pa nthaka.

Ntchitoyi idzakhudzanso kuunika za mmene mpweya ulili (ubwino wake), phokoso lomwe lingadzabwere malinga ndinchitoyi, chikhalidwe cha anthu, za make dzana monga malo okopa alendo komanso ndi mmene fumbi kapena kugwedezeke kwa nthaka chifukwa cha ntchitoyi kungasinthire chikhalidwe cha anthu m'derali. Kafukufuku oonanso ngati pangadzafunike kuti anthu ena asunthidwe adzachitkanso.



Chithunzi 3: Akatswiri adzapanga kafukufuku oonika mmene zomera, mbalame, ma dambo, nyama, dothi, zokhudza mbiri ya anthu komanso zina za mbiri zingadzakhudzidwire ndi ntchito ya mg'odi omwe ungadzakhazikitsidwe ku Malingunde.

Zowawa komanso zovuta zomwe zingabwere ngati m'godiwu utakhazikitsidwa:

Mchodziwikiratu kuti nchito ya M'godiyi idzakhudza zinthu zina zosintha pa chikhalidwe cha anthu komanso pa zachilengedwe zopezeka ku dela la Malingunde. Ntchito za ngati izi, kawilikawiri zimabweretsa mwayi wa nchito komanso zimathandiza kutukula chuma cha dziko mu njira zosiyanasiyana.

Pakuyembekezereka kudzakhalala za bwino komanso zomwe sizingakhale za bwino kwenikweni. Mwachitsanzo malo olima a anthu ena adzatengedwa kukhala mbali imodzi ya m'godiwu komanso anthu ena akhoza kudzasunthidwa kupita kakakhala ku malo ena a chilendo.

Ntchitoyi ikhozanso kudzabweretsa kusintha pa ubwino komanso kuchuluka kwa madzi m'delali, kusokonezeka kapena kuononongeka kwa chilengedwe, kuchuluka kwa fumbi, phokoso komanso kwa magalimoto oyendayenda ku delali. Chilengedwe monga zomera komanso nyama zopezeka m'delali zikhozanso kudzasokonezedwa kapena kuonongeka.

Akatswili a kafukufukuyu adzaunika bwino lomwe za kuipa ndi ubwino wa ntchito ya m'gogiyi ndipo adzaikapo maganizo awo pa ndondomeko zomwe zingadzaikidwe pochepetsa chisokonezo kapena zoipa zomwe zingabwere chifukwa cha ku kukhazikitsidwa kwa m'godiwu ku delali.

Maganizo anu ndi ofunika kwambiri

Maganizo anu adzathandiza kuti mfundo zosiyanasiyana ziphatikizidwe ndikuikidwa mu ripoti yomaliza ya kafukufuku yemwe adzachitika molingana ndi malamulo a dziko lino. Chonde dzaperekeni maganizo anu pa misonkhano yomwe idzachitika mu mwezi wa Marichi ndi Sepitembala, 2018 ku ofesi ya C12 kapena AECOM kwa anthu omwe maina awo ali pa tsamba loyamba la kabukhuka. Mukhozanso kulemba maganizo anu pa kapepala komwe kali mu ka bukhuha. Mungathenso kulemba kalata okapena tumizani ku PO Box 30523, CC3, Lilongwe, Malawi.

FOMU YOLEMBETSERA KOMANSO YOLEMBAPO MAGANIZO ANU



Chonde lembani maganizo anu pa fomuyi ndikutumiza ku AECOM kapena C12 pasanafike pa 15 February 2018. Mukayankha mafunso ali pa fomuyi muthandiza kuti timve bwino lomwe maganizo anu pa nkhani ya M'godi omwe ungadzatssegulidwe ku Malingunde. Mutha kuonjezera ma peji ena ngati kutafunikira kutero.

Zokhudza inu		
Maina anu		
Tiuzeni ngati muli bungwe lovomelezeka / Farm kapena Bizinesi ndipo perekani dzina lanu:		
Malo omwe mumapezeka (mukhoza kuika adilesi yanu)		
Telefoni:	Foni ya mmanja:	
Email:		
Kukhudzidwa kwanu pa nchito ya M'godi omwe ungakhazikitsidwe ku Malingunde		
Kodi muli ndi maganizo ena ali wonse okhudza M'godi omwe ungadzakhazikitsidwe ku Malingunde?		
Kodi muli ndi nkhwana zili zonse ngati M'godiwu utakhazikitsidwa ku Malingunde? (mwachitsanzo, kuonongeka kwa madzi) Kapena chilengedwe)		
Ngati mukudziwa wina aliyense yemwe ayenera kudziwa za ntchito ya M'godiyi isanakhazikitsidwe chonde tiuzeni momwe tingawapezere :		
Maina awo:		
Mudzi / Bungwe / Farm:		
(Keyala yawo) Address:		
	Telefoni:	
	Fax:	
	Foni ya mmanja:	
	Email:	

APPENDIX E

ATTENDANCE REGISTERS OF ANNOUNCEMENT MEETINGS (DECEMBER 2017)

APPENDIX F

NEWSPAPER ADVERTISEMENTS

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) MALINGUNDE GRAPHITE PROJECT

Sovereign Metals Limited (Sovereign) is currently conducting technical studies, which will culminate in a feasibility study, to determine the viability of developing the natural flake graphite deposit at Malingunde. In addition to the feasibility study, Sovereign has commenced an environmental and social impact assessment (ESIA) process as required in terms of the Environment Management Act (No 19 of 2017).

DEVELOPER

McCourt Mining Pty Ltd (McCourt) is a wholly owned subsidiary of Sovereign and is the holder of the exclusive prospecting licence, EPL0372, in which the Project is located. McCourt will be the applicant for the applicable environmental authorisation as per the requirements of the Environment Management Act.

LOCATION

The proposed project is located approximately 15 km southwest of Malawi's capital city of Lilongwe and falls within the Lilongwe District of the Central Administrative Region.

PROJECT DESCRIPTION

The Malingunde Graphite Project is proposed to be developed as an open pit mining operation, with annual graphite concentrate production of approximately 44,000 tonnes (t) over an initial life-of-mine (LOM) of 17 years. Mining will be undertaken in shallow open pits, with maximum depths of 25 m and maximum widths of approximately 150 m. The assumed mining method is via standard open pit methods, and to be free digging with conventional excavators and haul trucks to deliver ore to surface. The ore will be processed on site with the final product to be transported by road to the Kanengo train station north of Lilongwe, from where it will be sent by rail to the port of Nacala in Mozambique for export.

The Project is likely to include the following infrastructure:

- A series of shallow open pits.
- A waste rock dump (WRD).
- A low grade stockpile.
- An ore processing plant.
- A tailings storage facility (TSF).
- Water storage dams and site water management infrastructure.
- Workshops to service and maintain mining fleet and equipment.
- Diesel fuel storage.
- Site offices and administration buildings.

REVIEW OF DRAFT ENVIRONMENTAL SCOPING REPORT

You are invited to review and comment on the draft environmental scoping report which will be available from **5th March to 13th April, 2018** at the following places:

- a) Electronic copy: <http://sovereignmetals.com.au/building-malingunde/>
- b) Offices of C12 – Office Number 7, Skyband Complex, off Paul Kagame Rd, Lilongwe
- c) Environmental Affairs Department (EAD)
- d) Lilongwe District Council Offices
- e) Offices of the Traditional Authority for the Malingunde area.

Meetings will be held from **7th to 13th March, 2018** with various stakeholders to discuss the contents of the Draft Scoping Report and to obtain comments on the contents of the report. Should you wish to attend any of these meetings, please register your interest with the stakeholder engagement consultants as follows:

Dorothy Mbendela: Tel: +265 998 521 663 /+265 881 409 466

Email: admin@ctwelve.org

Anelle Lötter

Email: anelle@jaws.co.za

Comments on the draft environmental scoping report must be submitted in writing to the stakeholder engagement consultants by **13th April, 2018**.

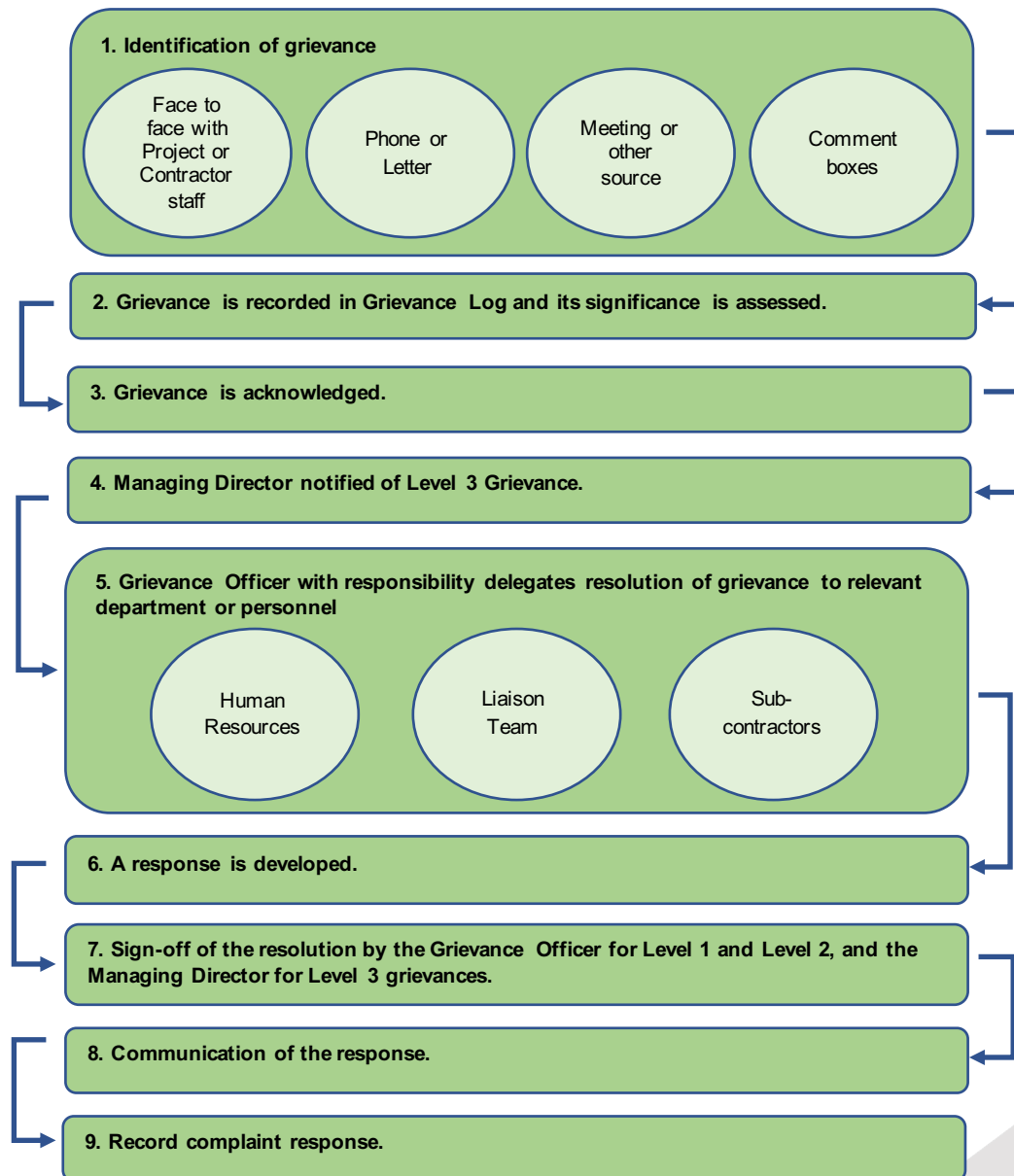
APPENDIX G

GRIEVANCE MECHANISM

Malingunde Project Grievance Mechanism

There are 10 steps that complete the formal grievance process. This process is also summarised in Figure G1, and each step is described below.

Figure G1: Grievance procedure



Step 1: Identification of grievance through personal communication with Project or Contractor staff, phone, letter, during meeting, or other Communication

Step 2: Grievance is recorded in the 'Grievance Log' (written and electronic) within one day of identification. All grievances will be registered and kept on file with the Sovereign Country Manager. Sovereign will also nominate a person responsible for a Level 1 complaint (Grievance Officer), who

will also hold/own the grievance log. Once logged, the significance of the grievance will be assessed within five to seven days using the criteria outlined below.

- **Level 1 Complaint:** A complaint that is isolated or 'one-off' and essentially local in nature. These will largely include issues that do not require compensation and that can be resolved through a face-to-face meeting between the complainant and Sovereign. Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).
- **Level 2 Complaint:** A complaint which is widespread and repeated (e.g., lack of access to information, no access to web site).
- **Level 3 Complaint:** A once-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of Sovereign's policies or national law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., major spillage of chemicals, significant damage to property, accidents causing significant injury to individuals or a fatality).

Step 3: Grievance is acknowledged through a personal meeting, phone call, or letter as appropriate, within a target of three working days after submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.

Step 4: The Grievance Officer is notified of all grievances while the Sovereign Country Manager is notified of all Level 2 or 3 grievances. The senior management will, as appropriate, support the Grievance Officer in deciding who should deal with the grievance, and determine whether additional support into the response is necessary.

Step 5: The Grievance Officer delegates the grievance within three days via e-mail to relevant department(s)/ personnel to ensure an effective response is developed e.g., HR, Project or Contractor staff etc. for Level 2 and 3 grievances. For Level 1, the grievance will be delegated immediately upon acknowledgement.

Step 6: A response is developed by the delegated team and Grievance Officer within 7 days for Level 2 and 3 grievances, with input from senior management and others, as necessary. A response will be provided within 3 days for Level 1 grievances.

Step 7: The response is signed-off by the senior manager for Level 3 grievances, the Grievance Officer for Level 2 grievances within 7 days. In situations where the grievance requires more than seven working days for investigation, the complainant will receive an explanation of the situation in writing. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the Grievance Officer and referred to in the grievance log. Sign-off for Level 1 grievance by the Grievance Officer will be within 3 days.

Step 8: Communication of the response should be carefully coordinated. The Grievance Officer ensures that an approach to communicating the response is agreed and implemented.

Step 9: Record the response of the complainant to help assess whether the grievance is closed or whether further action is needed. The Grievance Officer should use appropriate communication

channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood and is satisfied with the response. The complainant's response should be recorded in the grievance log.

Step 10: Close the grievance with sign-off from the Grievance Officer, who assesses whether a grievance can be closed or whether further attention is required. If further attention is required, the Grievance Officer should return to Step 2 to re-assess the grievance. Once the Grievance Officer has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the Sovereign Country Manager for Level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which should be filed by the Grievance Officer and referred to in the grievance log. It is expected that all Level 1 grievances will be closed within 5 days. The process may take longer for Level 2 and Level 3, depending on the response of the complainant.

A grievance that remains unresolved despite following all the available channels to solve it will be forwarded to Sovereign's Legal Counsel for further action. In such cases, the complainant has the right to refer such issues to; a local institution (if applicable); a formal organisation for dispute resolution; or to the courts.

APPENDIX H

COMMENTS AND RESPONSE REPORT

Proposed Malingunde Graphite Project

Environmental and Social Impact
Assessment (ESIA)

Comments and Response Report (CRR)

Sovereign Metals Limited

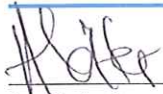
Project Number: 60559368

Final Version 1 of 4

February 2018

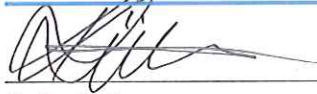
Quality information

Prepared by



Anelle Lotter
Stakeholder Engagement
Practitioner

Checked by



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Project Manager

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2.	Comments Received on the Draft Scoping Report.....	48

Abbreviations

BID	Background Information Document
DSR	Draft Scoping Report
ESIA	Environmental and Social Impact Assessment
NGO	Non-government Organisation
RAP	Resettlement Action Plan
SIA	Social Impact Assessment

FINAL

Preamble

This comments and response report (CRR) (Version 1) provides a summary of the comments, questions and issues raised by stakeholders since December 2017 when the environmental and social impact assessment (ESIA) process was announced.

- Version 1 of the CRR will be appended to the draft scoping report (DSR) and will include comments from stakeholders raised from 4 December 2017 to 28 February 2018
- Version 2 of the CRR will be appended to the final scoping report (FSR) and will include comments that were raised on the draft scoping report from 5 March to 13 April 2018.
- Version 3 of the CRR will be appended to the draft ESIA report and will include comments that were raised up to the completion of the draft ESIA report.
- Version 4 of the CRR will be appended to the final ESIA report and will include comments that were raised on the draft ESIA report.

FINAL

1. Comments Received During Announcement (4 December 2017 to 28 February 2018)

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
How much ore will be taken out to produce the proposed 44 000 tonnes of graphite concentrate annually?	Mr	Nisile Mwaisunda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with the Environmental Affairs Department (EAD) and the Department of Mines	The scoping study indicated that approximately 475 000 tonnes of ore will be mined to produce about 44 000 tonnes of graphite concentrate per annum. Further detailed studies and associated modelling are underway to determine exact volumes.
The project area is in close proximity to a water resource and the potential impacts to groundwater and surface water have to be considered.	Mr	Nisile Mwaisunda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Specialist studies will be undertaken as part of the ESIA to determine potential impacts. Discussions will be held with stakeholders specifically relevant to the water resource in close proximity of the project area, e.g. Lilongwe Water Board, the Department of Water.
The Department of Finance should be consulted early in the process to obtain their expectations and requirements. A potential mining development could have a positive impact on the country's revenue.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted and a meeting will be scheduled.
Consult with the Malawian Energy and Regulatory Authority (MERA) in terms of fuel licences for storage of diesel.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted and a meeting will be scheduled.
Working with a Malawian consultant in the preparation of the documents to be submitted to the EAD was recommended.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted. C12, a Malawian consultant, forms part of the team and will be assisting during the ESIA process.
It is recommended that the Environmental District Officer (EDO) should attend meetings with potentially affected communities. The presence of the EDO can assist the EAD to verify that all concerns, questions and comments are reflected in the ESIA	Mr	Patrick Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted. Mr Biswick Mlaviwa is the relevant EDO and he was invited to attend all meetings to be held during the ESIA process.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
documents to be submitted to the EAD. The EDO should be involved in every step of the ESIA process.						
The Department of Statistics keeps socio-related data for the country and it can be acquired from them. Data relevant to other aspects is kept by the relevant departments.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted.
The Department of Lands is a key stakeholder to liaise with about the development of a resettlement action plan (RAP). The Land Officer at District Commissioner (DC) level has to accompany the ESIA team when potentially affected communities are consulted about land matters. The presence of the Land Officer can assist the EAD and the Department of Lands to verify that all concerns, questions and comments are reflected in the ESIA documents to be submitted to the EAD.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted. The Land Officer at DC level, Mr James Mwenda was invited to attend all meetings to be held during the ESIA process. He will also be engaged when resettlement-specific work is undertaken.
For the ESIA process, the EAD is the authority that will provide an ESIA certificate. The ESIA certificate is a requirement for the application of a Mining Licence.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted.
Details of the stakeholders that were consulted has to be included in the reports which are to be submitted to the EAD. This will allow the EAD to verify concerns raised by stakeholders should it be necessary.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted. A stakeholder database as well as all attendance registers of meetings held will be included in all reports to be submitted to the EAD.
Potentially affected stakeholders can lodge complaints with regards to the ESIA process to structures known to them which fall under the jurisdiction of the DC.	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted.
There could be a requirement from the EAD for public hearings. Once the ESIA report was submitted to the EAD the process of approval may take 3 – 6 months. Should there not be	Mr	Tananga Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
funds available at the EAD, the developer may be approached to assist with the process to arrange public hearings in order not to cause a delay in the approval process. The Technical Committee (TC) will review the ESIA report as part of the approval process. There is no need for the ESIA team to consult with the TC, however the TC may request the ESIA team to present the ESIA to them. Once the TC has reviewed the document, the National Council of Environment (consisting of representatives of the relevant Ministries) will also review the document.						
A rehabilitation and closure plan for the proposed Malingunde Project is important and should be submitted with the ESIA. The proposed plan should also provide various alternatives.	Mr	Patrick Nyirenda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	A proposed rehabilitation and closure plan will be included with the ESIA report and will consider progressive rehabilitation, as well as end land uses upon closure.
The relevant non-government organisations (NGOs) have to be consulted. The relevant NGOs will have to be verified with the DC's office. It was recommended that the ESIA team verify that all attendees at meetings sign an attendance register.	Mr	Nisile Mwaisunda	Environmental Affairs Department (EAD)	04/12/2017 at 10:00	During a meeting held with EAD and the Department of Mines	Noted. The list of NGOs to be consulted during the ESIA will be verified with the DC's office.
Consultation with stakeholders should happen at every stage of the project to ensure good communication about the project. The Member of Parliament (MP) for the Malingunde area supports the proposed development.	Hon	Peter Dimba	Member of Parliament (MP) Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Stakeholder engagement is planned for the Scoping and ESIA phases of the project. As part of certain specialist assessments, consultation with stakeholders will also be undertaken.
Is a RAP in place or will it be submitted with the ESIA?	Ms	Cynthia Chilima	Ministry of Lands, Housing and Urban Development	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	The RAP will be compiled as part of the ESIA and submitted with the final ESIA report for review and approval. The RAP will be compiled in compliance with the relevant Malawian legislation and international best practice.

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
Road access should also be included in the scope of work to ensure potential graves and cultural heritage sites along roads proposed to be used are identified.	Mr	Moses Mkumpha	Department of Antiquities	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted. A logistics study and a cultural heritage impact assessment will be conducted as part of the ESIA and all potential impacts in the project area and along proposed access roads will be assessed.
Which activities will take place between the availability of the draft scoping report and the draft ESIA report?	Mr	Jones Malili	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	During the review period of the draft scoping report, meetings will be held with stakeholders to receive their inputs on the report. Various specialist studies will be conducted as part of the ESIA process. The findings of their studies will be reflected in the draft ESIA report, which will be made available in September 2018 for public review. Baseline data collection activities (e.g. air quality and water sampling), which have already commenced, will continue throughout the process.
How was the project area determined?	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	The project area, as it was communicated in the BID, is part of the Exclusive Prospecting Licence (EPL0372) held by McCourt Mining and was determined by the location of the graphite resource and potential positions of required infrastructure. However, the project area may change and will likely become smaller as the findings of various specialist studies will assist in informing the location of the proposed infrastructure. As the ESIA process progresses, more detailed information will be provided.
From where will water for processing be sourced and how much water will be required by the proposed mine?	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at	Specialists will assess possible sources of water, which may be a combination of surface and groundwater. The volume of

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
					Crossroads Hotel	water required is still to be determined. Relevant stakeholders will be consulted to discuss options. Water will be re-used as much as possible for operational requirements.
The ESIA will have to assess potential impacts in a wide area and not just in the proposed project area.	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	The ESIA will investigate potential cumulative impacts and impacts resulting from Project activities that may potentially have an impact beyond the proposed Project area.
What happens at the project area after 17 years of mining? Will people be able to move back to the area?	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	A rehabilitation and closure plan will be included in the ESIA report and will consider progressive rehabilitation, as well as end land uses upon closure. Whether people will be able to move back will be investigated as part of study, however it will depend on the proposed end land use of the area.
Ensure that specialists are appointed that has the required expertise and capabilities.	Mr	Moses Mkumpha	Department of Antiquities	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	The proposed archaeology and cultural heritage specialists' details were provided to the Department for verification. Mr Moses Mkumpha responded on 12/12/2017 that the specialists have a good reputation and can be used.
Communities and the traditional structures should be involved with the identification of graves and other cultural and heritage important aspects / places / articles.	Mr	Moses Mkumpha	Department of Antiquities	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted. The approach suggested will be followed and the heritage specialist will liaise with the traditional authority and communities in the project area.
Recommended that specialists liaise directly with communities to ensure the integrity of the assessments and involvement from people at household level. It was also suggested that church societies be involved to obtain their inputs.	Mr	Moses Mkumpha	Department of Antiquities	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
In terms of resettlement, it is important to ensure that those that potentially have to be moved understand where they will be relocated to and to ensure that they are satisfied with the new location.	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted. A RAP will be compiled with due care of the Malawian legislation, international best practices and in consultation with all stakeholders.
People in the Malingunde area think that mining is already happening, and they would like to know when they will be moved.	Mr	Howard Bowa	Friends of Malingunde	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Mining has not yet started. The activities that people in the project area may see are part of exploration activities and specialist investigations to inform the ESIA. Samples are taken and submitted to laboratories for further tests. Mining cannot start without the required authorisation from the Environmental Affairs Department and the issuing of a Mining Licence from the Department of Mines.
The Friends of Malingunde is a voice for the people staying in the proposed project area and their inputs is a true reflection of the views of the people in the Malingunde area.	Mr	Dean Lunga	Chamber of Mines, President	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted.
Corporate social responsibility is important and issues regarding this has to be considered in the ESIA process.	Mr	Dean Lunga	Chamber of Mines, President	04/12/2017 at 14:00	Meeting with government departments at Crossroads Hotel	Noted. The SIA will investigate the social needs and potential benefits that may be derived from the project.
The District Commissioner's office is glad to hear of the proposed Malingunde Graphite Project and would like to receive information to share with other relevant stakeholders.	Mr	Lawford Palani	District Commissioner	05/12/2017 at 10:00	Meeting with the District Commissioner's office	As the ESIA process progresses all stakeholders will be notified of opportunities to comment, become involved and to attend meetings to discuss new information and reports that will become available.
The project should be managed so that it is beneficial to both the mining company and the people of Malawi. Sovereign Metals can be assured of the support of the District Commissioner's office. Good cooperation between the DC office and the ESIA team is	Mr	Lawford Palani	District Commissioner	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted with thanks.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
required.						
Malawi cannot afford to lose an investor; however, no development can be at the expense of the environment and the people.	Mr	Lawford Palani	District Commissioner	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Independent consultants were appointed by Sovereign Metals to undertake the ESIA process to ensure that the work to be done will be transparent and compliant with Malawian legislation and international best practice.
If the information provided states that ~ 44 000 tonnes of graphite concentrate will be produced annually, how much ore and other waste will be taken from the land on an annual basis?	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	The scoping study indicated that approximately 475 000 tonnes of ore will be mined to produce about 44 000 tonnes of graphite concentrate per annum. Further detailed studies and associated modelling are underway to determine exact volumes.
Can the DC office join the proposed meeting with the Lilongwe Water Board?	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Yes, the DC's office is welcome to join all meetings in the ESIA process. A list of the meetings to be held will be provided to the DC's office.
The Kamuzu Dam and its extensions is a great investment of Lilongwe and a cautious approach should be followed in terms of the assessment of water requirements for the project.	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Specialists will assess possible sources of water, which may be a combination of surface and groundwater. The volume of water required is still to be determined. Relevant stakeholders will be consulted to discuss options. Water will be re-used as much as possible for operational requirements.
How do you plan on rehabilitating the mine after the initial life-of-mine of 17 years? Do you propose for the open pits just to fill with water?	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	A proposed rehabilitation and closure plan will be included with the ESIA report and will consider progressive rehabilitation and end land uses towards closure. Various options will be considered. Empty pits will naturally fill with water from groundwater inflow upon closure, if left as open pits and not

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
						backfilled.
The sizes and dimensions of the proposed infrastructure is required – what would be the size of the stockpile and tailings storage facility?	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	As part of the feasibility studies, engineering studies are also underway which will determine the sizes and dimension of the infrastructure. This will be based on the amount ore mine, and waste rock and tailings produced. The information will be made available during the ESIA process.
The potential impacts on traffic and existing road infrastructure to transport the graphite concentrate to the rail station should be investigated.	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	A logistics study will be conducted as part of the ESIA and will specifically assess the transport of materials and concentrate and is likely to determine if the existing road infrastructure will be able to accommodate large trucks and increased volumes of traffic.
Which road is proposed for the transporting of the graphite concentrate to the rail station? The existing road through the villages is not designed for large trucks and the ESIA team may need to consider alternative options.	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	A specific road has not yet been identified as a number of options will be investigated as part of the feasibility study.
Resettlement along the road proposed to be used for transportation of the graphite concentrate may also need to be considered if the road needs to be upgraded.	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted. A RAP will be compiled, inclusive of all options and alternatives to be investigated.
The vibration of trucks and other vehicles should be investigated as it may also impact on house in the vicinity where the vehicles are used.	Mr	Douglas Moffat	Development Planning Director	05/12/2017 at 10:00	Meeting with the District Commissioner's office	A vibration impact assessment will be done as part of the ESIA study to determine potential impacts.
It is a requirement to provide objective and inclusive information and for the specialist studies to be conducted in the same manner.	Mr	Biswick Mlaviwa	Environmental District Officer (EDO)	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted. The ESIA team consists of a number of independent specialists. All specialist reports will be appended to the ESIA report and made available to stakeholders for review and comment.

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
Provide comprehensive information, inclusive of alternatives in terms of location and technology.	Mr	Biswick Mlaviwa	Environmental District Officer (EDO)	05/12/2017 at 10:00	Meeting with the District Commissioner's office	The ESIA will consider reasonable and feasible alternatives for location of activities and processing technology.
Mining is a new industry in Malawi and there is a tendency for many misunderstandings, please be sensitive to that. It is suggested that NGOs be included in the consultation process as they often assist to alleviate misunderstandings.	Mr	Biswick Mlaviwa	Environmental District Officer (EDO)	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted. NGOs will be included in consultation meetings during the ESIA process.
A meeting with the Lilongwe Water Board is critical to discuss potential water resources for the Malingunde Project.	Mr	Biswick Mlaviwa	Environmental District Officer (EDO)	05/12/2017 at 10:00	Meeting with the District Commissioner's office	A meeting with the Lilongwe Water Board was scheduled and the office of the DC was invited to the meeting.
It is positive that the ESIA team takes on board local consultants. Local Malawian consultants will provide knowledge of the area and its people as well as information on processes which will be required.	Mr	Biswick Mlaviwa	Environmental District Officer (EDO)	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted.
Mining is new for Malawi and resistance can be expected, especially in terms of resettlement and compensation. It is suggested that the ESIA team work closely with civil society organisations and NGOs in communication with households. A previously proposed project for the development of the Diamphwe Dam was not successful and lessons should be learnt from that experience.	Mr	James L Mwenda	Lands District Officer	05/12/2017 at 10:00	Meeting with the District Commissioner's office	All stakeholders will be consulted during the ESIA process and all will have the opportunity to share their views and experiences. A RAP and associated compensation will be compiled according to the requirements of Malawian legislation and international best practice, which includes consultation with all resettlement-affected households and the relevant authorities.
The proposed project area is close to the Kamuzu Dam 2 and the management plans with regards to heritage (e.g. graves) will have to be reviewed.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	A heritage specialist will identify all features of archaeological, heritage and cultural importance in the project area. Management and mitigation plans will be developed based on the specialist assessment.

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Generally, soils containing graphite is also associated with high levels of iron. There is a concern for possible pollution of the groundwater.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	A groundwater assessment will be undertaken which will include modelling of groundwater flow. Such a model together with monitoring data will be used to determine potential pollution plumes. A soils assessment will be conducted to identify elements present in the soils.
What are the proposed plans with the rehabilitation of the site after mining? Will the pits be backfilled? Filling the pits with water may pose a risk to communities, especially children. Standing water may also become breeding areas for malaria.	Mr	Bester Kamwaza	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	A rehabilitation and closure plan, including proposed end land uses will be compiled as part of the ESIA report. The plan will also consider progressive rehabilitation to be undertaken throughout the life of the mine.
There is a buffer zone around the reservoirs (dams) – how far is the proposed development planned from the buffer zone? The buffer zone is planted with sisal and in the event that there will be any damage to the plants, the area will have to be rehabilitated at the mine's cost.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	The proposed location of infrastructure is not yet known. As part of the feasibility studies, engineering studies are underway which will determine the location and dimensions of infrastructure. The specialist studies to be conducted as part of the ESIA will assist with information to determine the optimal position for infrastructure. The buffer zone requirements will be considered in the feasibility studies.
At this point in time, the Kamuzu Dam provides the only source of water to Lilongwe Boma and risks, interruptions and disturbances to customers cannot be tolerated and afforded.	Mr	Bester Kamwaza	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Noted.
Lilongwe Water Board will not accept any discharge from the mining operations into the river as such discharge is usually polluted. No pollution of the surface and groundwater will be accepted.	Mr	Bester Kamwaza	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Noted. The question was posed whether discharge, compatible with drinking water standards will be accepted.

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Careful consideration has to be given to management and mitigation measures in the case of flooding as the river quality is of great concern.	Mr	Bester Kamwaza	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Noted. As part of the ESIA management and mitigation measures will be considered with regards to potential flooding in the area.
The information provided states that the project area is near a potential water resource – is extraction from the Kamuzu Dam proposed?	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	As part of the ESIA and feasibility studies an assessment of available water resources will be undertaken. Investigations will include the assessment of surface and groundwater as sources. Should the available groundwater from pit dewatering not be sufficient, the Lilongwe Water Board will be approached to discuss options to extract water from the dam. The approach will first be to re-use water at the mine as much as possible.
Historic water data and discharge data is available from the Lilongwe Water Board and can be made available.	Mr	Bester Kamwaza	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Noted with thanks.
The Lilongwe Water Board provided permission for specialist to sample fish species at the Kamuzu Dam and the Lilongwe River.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Accepted with thanks. A formal letter in this regard will be submitted to the Lilongwe Water Board.
Information should be provided on what is planned in terms of social development associated with the project.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	A SIA will be conducted as part of the ESIA. The needs of communities will be analysed as part of this study and it is proposed to use that as a basis to develop a plan for potential social development initiatives.
SMEC has compiled a report recently on the status of siltation of the Kamuzu Dam and the information can be obtained. It seems that there is no serious concern with siltation of the dam.	Mr	Charles Kachingwe	Lilongwe Water Board	06/12/2017	Meeting with Lilongwe Water Board	Information is appreciated, and a report will be requested from SMEC.

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The information provided in the Background Information Document and as part of the presentation is not sufficient. More information is required about the track record and work experience of the companies involved in the ESIA process, Sovereign Metals and McCourt Mining.	Mr	Billy Mayaya	Human rights activist working with communities	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	At this stage – at the beginning of the scoping phase – the information is limited as most of the investigative work still has to be undertaken as part of the ESIA. It is important that stakeholders provide their concerns and questions to ensure that these are considered for the formulation of the terms of references for the specialist studies. As the ESIA process progresses, more information will become available and will be shared with stakeholders for their review. Information on Sovereign Metals and McCourt Mining is publicly available. Should there be specific questions, these should be forwarded to the stakeholder consultation team.
Concerned over human rights issues and transparency and would like to know how the people of Malingunde will be afforded the opportunity to give their demands?	Mr	Billy Mayaya	Human rights activist working with communities	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	The ESIA study is undertaken in compliance with Malawian legislation and international best practice and standards, which are particularly sensitive to human rights issues. The households of the Malingunde project area will be consulted individually, and meetings with them and representative structures will be held during the ESIA process.
A concrete time line of the ESIA process and for the project implementation is required.	Mr	Billy Mayaya	Human rights activist working with communities	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	The timeline for the various ESIA phases and the associated activities for each phase was communicated in the presentation and also in the BID.
A conflict resolution mechanism has to be developed as part of the process.	Mr	Billy Mayaya	Human rights activist working with communities	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	A grievance mechanism will be developed as part of the stakeholder engagement plan (SEP) that will be compiled. Details of the grievance mechanism will be included in the draft

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						scoping report for review.
Households will be interested in timelines – for example, when will people be resettled, etc?	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	The ESIA study forms part of the feasibility phase to determine whether the project is viable or not. Towards the end of 2018 a decision will be taken on whether the proposed Malingunde Project is feasible or not. There is no date for possible resettlement as it has not yet been determined which households may be impacted and whether resettlement would be required. The RAP will be compiled during 2018, but this is a plan only that may or may not be implemented once a decision about the future of the project has been taken (that is, whether or not the Project will go ahead).
More information and detailed descriptions are required in terms of the proposed operation of the mine, especially in terms of the zero-discharge approach and re-use of water.	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	As the ESIA process and the specialist studies progress, more information will become available and it will be provided to stakeholders for their comment.
Information about the proposed rehabilitation and closure of the mine is required.	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	A rehabilitation and closure plan will be included in the ESIA report and will consider progressive rehabilitation, as well as end land uses upon closure.
What will be the mine's corporate social responsibilities? How will communities benefit?	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	As part of the SIA report a needs analysis will be conducted, which will form the basis of determining corporate social responsibility initiatives.

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Appreciation was expressed for the inclusion of NGOs and civil society organisations early in the process.	Ms	Elyvin Nkhonjera Chawinga	Oxfam Malawi	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. All interested and potentially affected parties are important in the ESIA process.
Consultation has to take place in such a manner that stakeholders can speak for themselves. Many structures have their own agendas and it is therefore important that the ESIA team speak with individual stakeholders and not just with their representatives.	Ms	Elyvin Nkhonjera Chawinga	Oxfam Malawi	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	The ESIA study is undertaken in compliance with Malawian legislation and international best practice and standards, which are particularly sensitive to human rights issues. The households of the Malingunde project area will be consulted individually, and meetings with them and representative structures will be held during the ESIA process.
Stakeholders have to be properly informed and principles of free prior informed consent as per the IFC Performance Standards is recommended.	Ms	Elyvin Nkhonjera Chawinga	Oxfam Malawi	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted.
Clearly provide a strategy of how information will be shared with different stakeholders.	Ms	Elyvin Nkhonjera Chawinga	Oxfam Malawi	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	A stakeholder engagement plan will be compiled and included in the draft scoping report for stakeholders to review.
Mechanisms should be put in place to monitor the proposed implementation. Government and the office of the EAD is constraint and additional assistance will be required. A manifest with communities (community development agreement), which describe dual benefits, should be considered.	Ms	Elyvin Nkhonjera Chawinga	Oxfam Malawi	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted.
Rehabilitation, closure and proposed end land use is important and should be clarified before the mine operations begin. Life beyond mining is important to discuss at the beginning of the process.	Mr	Howard Bowa	Friends of Malingunde	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. A rehabilitation and closure plan will be developed and will consider progressive rehabilitation, as well as end land uses upon closure. This will be made available with the draft ESIA report

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						for stakeholder review.
What measures will be put in place for resettlement, pollution and other matters that may bring about social conflict?	Mr	Howard Bowa	Friends of Malingunde	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Management and mitigation measures will be developed and included in the draft ESIA report, which will be made available for stakeholder review and comments. A separate resettlement planning process will be undertaken in consultation with all resettlement-affected households and relevant authorities. A RAP document will be submitted to the Department of Lands for their consideration and approval.
With the project an influx of people is expected, however the same level of services and infrastructure will not be sufficient for more people.	Mr	Howard Bowa	Friends of Malingunde	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. The matter will be considered as part of the SIA.
Water quality as a specialist assessment will have to be added to the list of proposed specialist studies to be conducted.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. Water quality will be investigated as part of the surface and groundwater assessment.
A livelihoods assessment must be conducted since the main economic activity in the Malingunde area is farming. The proposed mine will most likely displace farming land.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. Livelihoods will be considered as part of the RAP and the SIA to be conducted.
A soil and land capability assessment must be conducted. There is concern that spoils disposal sites may pollute the area and that it may also not be rehabilitated after mining came to an end.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	A soil and land capability assessment will be conducted, and the findings will be made available as part of the draft ESIA report for stakeholder review. A rehabilitation, closure and end land-use plan will be compiled and also made

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						available with the ESIA report.
The potential impact of dust on crops should be investigated.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	An air quality assessment will be conducted, and the findings will be made available as part of the draft ESIA report for stakeholder review.
Ensure that the terms of references (TORs) in the ESIA are well described so that gender issues, benefits, potential relocation process, etc. are well covered.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. The draft scoping report will include the terms of references for each specialist study to be conducted. The report will be made available for stakeholder review.
Flow patterns of groundwater and surface water should be investigated to assess for the mitigation and management of potential pollution through water. An area broader than the project area should be assessed – a catchment-wide study is recommended.	Mr	Charles Mkoka	AEJ and Ecosystems Partners and Communications	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. Models for surface and groundwater flow will be compiled as part of the surface and groundwater specialist studies.
Is it proposed to mine through the Kamuzu Dam and Lilongwe River?	Mr	Maxwell Chaonekera	Friends of Malingunde	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	No, it is not proposed to mine through the river or the Kamuzu Dam.
Stakeholders' land rights have to be observed and cognisance has to be taken of all applicable legislation. The Malingunde Project area is still customary land.	Mr	Maxwell Chaonekera	Friends of Malingunde	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted.
It is recommended that stakeholders have to be communicated with when all are under one roof – thus the same messages have to be communicated to all parties. The management of expectations and interests may be challenging and a need to clearly indicate process and activities to communities	Mr	Matthews Malata	Association for Environmental Journalists	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. As further information becomes available the information will be shared with all stakeholders. At the beginning of the scoping phase indication is provided that further engagement will take place in review of the draft scoping report in March 2018 and also again in September

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for them to know what to expect was suggested.						2018 when the draft ESIA report will be available for review.
Media engagement should be proactive, open and transparent. The compilation and distribution of a media release should be considered, as well as an event such as a media briefing / press conference.	Mr	Matthews Malata	Association for Environmental Journalists	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted.
When the draft scoping report is available it is recommended to implement a specific communication plan that will communicate at all levels, through various mechanisms and to all stakeholders.	Mr	Matthews Malata	Association for Environmental Journalists	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. A SEP will be developed and details of proposed communication included in the draft scoping report for stakeholder review.
Communities have to know who the ESIA team and the mining company are. Proper introduction, highlighting capabilities and expertise is important.	Ms	Agness Mpoto	Catholic Commission for Justice and Peace (CCJP)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. During the next round of stakeholder engagement meetings, the expertise and experience of the companies will be highlighted.
The area close to the Kamuzu Dam poses many risks and should be thoroughly investigated by all specialists.	Ms	Agness Mpoto	Catholic Commission for Justice and Peace (CCJP)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted.
The development of a clear and concise RAP and associated compensation is very important. Mining is a new concept in Malawi and stakeholders will have to be assisted with general understanding of the industry.	Ms	Agness Mpoto	Catholic Commission for Justice and Peace (CCJP)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. All reports compiled will comply with Malawian legislation and adhere to international best practices.
Neglect of local communities has proved to be a source of conflict in major projects, plans must be put in place to ensure that the local people are not left behind.	Ms	Agness Mpoto	Catholic Commission for Justice and Peace (CCJP)	06/12/2017	Meeting with NGOs and civil society at the Cross Roads Hotel at 14:00	Noted. Household meetings and surveys are proposed as part of the ESIA specialist studies and further engagements are planned to share information when the draft scoping report and draft ESIA report are made available for review.
Will compensation for both houses and trees be provided during resettlement?	Mr	Maxwell Chaonekera	Friends of Malingunde	07/12/2017	Meeting with Traditional	If required, households will be compensated according to the

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					Authority and the DC at the DC offices at 10:00	requirements of the Malawian legislation and international best practices. As a general rule, compensation will be for houses and trees. The GIIP principle of “nobody should be worse off after resettlement” will apply.
What will the impact of the mining project be on the Malingunde area?	Mr	Maxwell Chaonekera	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	The purpose of the ESIA process is to identify and assess likely environmental and social impacts, and propose appropriate mitigation and management measures, as well as monitoring protocols. As the process unfolds the potential impacts will become known and the information will be made available in the scoping and ESIA reports for stakeholder review.
What will be the potential impact on the Kamuzu Dam? Will the ESIA team communicate with the Lilongwe Water Board?	Mr	Maxwell Chaonekera	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	The ESIA team met with the Lilongwe Water Board. Potential impacts on the Kamuzu Dam will be identified and assessed and measures proposed to minimise the impact through appropriate mitigation and management measures.
The proposed mining project will affect people. Has an area specifically been identified which will have to be resettled? What will be the process for resettlement?	Rev	LMN Hara	Malingunde CCAP (Church of Central Africa Presbyterian) Mission	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	A specific area has not yet been identified as the detailed layout of the mining area will only be determined once feasibility studies and specialist investigations have been completed. If resettlement is required, the process will be clearly documented in the RAP and shared with those who may be affected.
For how long will the mine be operational?	Mr	Eddie Kalonga	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Based on information available to date the initial life-of-mine is 17 years.

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What is the price of graphite on the international market?	Mr	Eddie Kalonga	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	The graphite price is determined by demand and by what the end user is willing to pay and is currently selling for \$300 - \$600 per tonne.
Are the feasibility studies conducted also complying with international standards?	Mr	Eddie Kalonga	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Studies conducted to date for the compilation of the Project Brief, which was submitted and accepted by the EAD was done in compliance with international standards. Any further studies will also comply with international standards and practices where relevant.
The project will have primary and secondary stakeholders. The primary stakeholders will move away if resettlement is required and the secondary stakeholders will stay behind. Both groups of people will have to benefit and how they will benefit has to be considered.	Mr	Howard Bowa	Friends of Malingunde	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	As part of the SIA and the RAP a needs analyses will be compiled and based on that decisions will be taken in terms of benefits to be derived as part of the project.
Can people return to the area after mining?	Rev	LMN Hara	Malingunde CCAP (Church of Central Africa Presbyterian) Mission	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	A rehabilitation and closure plan will be compiled and will consider progressive rehabilitation, as well as end land uses upon closure. Whether people can return to the area will be investigated, and the land use after mining will determine whether people would be able to resettle in the area.
To which area will people be resettled to?	Rev	LMN Hara	Malingunde CCAP (Church of Central Africa Presbyterian) Mission	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	It has not yet been confirmed that anybody will be physically displaced (which means that they have to be relocated). This will be determined by conducting a survey, to inform the compilation of an asset inventory, which details all the assets owned by community members in the area that will be affected by resettlement. If it is found that some people will be physically

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						diaplced and move house, a resettlement site will be identified in consultation with the relevant authorities and households affected by physical resettlement.
Please do not cheat our people – please be fair.	Rev	LMN Hara	Malingunde CCAP (Church of Central Africa Presbyterian) Mission	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Noted. According to international best practices in terms of compensation, people may not be worse off after resettlement and this principle will be followed should resettlement be required.
Since last year (2016) there has been excavation in the Malingunde area. Has the mining already started?				07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Mining has not yet started. The activities that people in the Project area may see are part of exploration activities and specialist investigations to inform the ESIA. Samples are taken and submitted to laboratories for further tests. Mining cannot start without the required authorisation from the Environmental Affairs Department and the issuing of a Mining Licence from the Department of Mines.
Concern was expressed over cultural heritage and the protection thereof.				07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Noted, specialists will undertake an archaeology and cultural heritage impact assessment in consultation with stakeholders in the area to identify relevant features.
It was positive that this meeting took place. All was thanked for their attendance, contribution and participation.	Mr	Lawford Palani	District Commissioner	07/12/2017	Meeting with Traditional Authority and the DC at the DC offices at 10:00	Noted
Demand track record of Sovereign Metals, McCourt and AECOM.	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	Information on Sovereign Metals and McCourt Mining is publicly available. Should there be specific questions, these should be forwarded to the stakeholder consultation team.

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Demand forensic audit reports.	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	Annual audited reports of Sovereign are available from their website. Should additional information be required, specific questions may be forwarded to the stakeholder engagement team.
Need a workplan which includes community stakeholders.	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	Activities in the ESIA process which may involve community stakeholders will be communicated through all required structures and notice will be provided beforehand to all stakeholders. Planned activities will be implemented by the ESIA team when relevant, albeit that there remains some flexibility in the programme to allow for any unforeseen changes or requirements to adapt the programme to specific circumstances.
Consider community development agreement.	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	Noted. The requirements for a community development agreement will be considered in consultation with the relevant government authorities.
Corporate social responsibility is required.	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	As part of the SIA report a needs analysis will be conducted, which will form the basis of determining corporate social responsibility initiatives.
<p>The following are specific concerns associated with the project:</p> <ul style="list-style-type: none"> - The lack of human rights considerations - Gender - Land rights - Dispute resolution mechanism 	Mr	Billy Mayaya	Human Right Activist working with communities	06/12/2017	Registration and Comment Form	Noted.
It is positive that stakeholders on all levels are engaged.	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Registration and Comment Form	Noted.

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Consider community mobilisation awareness and empowerment a priority.	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Registration and Comment Form	Noted.
<p>Sovereign Metals documents point to 65.1 million tonnes of graphite. It has also posted its share options on the stock exchange. The Australian media is awash with reports that Malingunde has reportedly the largest deposit of graphite. That is why Sovereign Metals currently owns three exclusive Prospecting Licences ELPO 335 granted in 2015 for two years; ELPO372 granted in 2016 for two years and ELPO granted in 2014 for three years. All these are renewable for two additional years.</p> <p>The licences are expansive in nature and scope include location and ownership agreements, material issues with third parties including joint ventures, partnerships, overriding royalties, nature title interests and historical sites.</p> <p>In view of these revelations, some of us would appreciate a more detailed explanation of the so called draft scoping report when revelations show that a scoping report has already been submitted to Sovereign by an individual named Amec Foster Wheeler with flow diagrams of how the mining process will take shape and form.</p>	Mr	Billy Mayaya	Human rights activist working with communities	15/12/2017	Email	<p>As per the latest company presentation by Sovereign Metals dated 14 November 2017, which can be found on the Sovereign Metals website (http://sovereignmetals.com.au/company-presentation/), the Malingunde Project is the world's largest reported saprolite-hosted graphite resource and hosts a total resource of 28.8 million tonnes @ 7.1% total graphitic carbon (TGC) (4.0% TGC cut-off grade), which includes 8.9 million tonnes high grade resource @ 9.9% TGC (7.5% TGC cut-off). The resource is the mineralised portion (graphite) that has been identified and estimated through exploration and sampling, and indicates that there are reasonable prospects for eventual economic extraction. As further indicated in the presentation, the proposed Malingunde Project is likely to mine only 8 million tonnes of ore from the resource at a grade of 10% TGC over the planned life of mine of 17 years to produce an average of 44,000 tonnes per annum of graphite concentrate at a grade of in excess of 95% TGC.</p> <p>A draft scoping study was compiled in June 2017 by the company Amec Foster Wheeler on behalf of Sovereign Metals. This scoping study was an initial technical and economic assessment to</p>

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						<p>determine the potential of the resource, define the conceptual processing technology and infrastructure requirements, and identify further work required to assess the feasibility of the Project. The results of this scoping study were announced on 20 June 2017 (see Sovereign Metals website) and provide the basis for the recently announced pre-feasibility study that is currently being undertaken.</p> <p>The scoping study referred to above should not be confused with the environmental scoping study, which is the first phase of the ESIA process. The purpose of the environmental scoping study is to identify potential issues and impacts which need to be assessed in further detail. The environmental scoping report (ESR) that will be made available for review by stakeholders in March 2017 will summarise existing information relating to the environmental and social aspects in the Malingunde Project area, identify potential issues and concerns raised by stakeholders, and detail the terms of reference for the specialist studies to be undertaken during the detailed impact assessment phase to assess environmental and social impacts.</p>
For the purpose of transparency, we would appreciate your comment on Billy's research and comment. This information looks by far contrary to the information that we got during	Mr	Jones Malili	Friends of Malingunde: Executive Director/Vice	15/12/2017	Email	The response above was also submitted to Mr Malili on 20/12/2017.

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<p>the stakeholder consultation meetings.</p> <p>As indigenous people of Malingunde, we are following all the activities and processes so closely so that we are not misinformed on any detail - be it pros or cons.</p>			Chairman			
<p>Is the BID considered public and if so, will it be available on Sovereign Metals or AECOM's website?</p>	Ms	Rachelle Etter-Phoya	Tax Justice Network	15/12/2017	Email	<p>The BID is public information and may be distributed to all interested parties. Visit the website http://sovereignmetals.com.au/building-malingunde/ for accessing copies of the BID.</p>
<p>What are the boundaries of the project? Which villages will be affected within the tenement area of the project?</p>	Mr	Robert I. Kawiya	Malingunde/Malili Community Member	08/01/2018	Registration and Comment Form	<p>The Project area, as it was communicated in the BID, is part of the Exclusive Prospecting Licence (EPL0372) held by McCourt Mining and was determined by the location of the graphite resource and potential positions of required infrastructure. However, the project area may change and will likely become smaller as the findings of various specialist studies will assist in informing the location of the proposed infrastructure. As the ESIA process progresses, more detailed information will be provided.</p> <p>The Project area is in close proximity to villages of Ndumila and Kamalindi. The extent of the impact on these villages is not yet known and will depend on the outcomes of the various technical and specialist studies that will be completed as part of the feasibility study and ESIA process.</p>

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I generally welcome the project and feel there will be job creation for local people. There are a lot of people with mining knowledge having worked in mines in South Africa and Zimbabwe. This resource has the potential to be utilised to improve income to their families.	Mr	Robert I. Kawiya	Malingunde/Malili Community Member	08/01/2018	Registration and Comment Form	Noted.
If people will be relocated, is there an effort to find areas for resettlement e.g. farms within Lilongwe district.	Mr	Robert I. Kawiya	Malingunde/Malili Community Member	08/01/2018	Registration and Comment Form	A RAP and associated compensation will be compiled according to the requirements of Malawian legislation and international best practice. The RAP will include alternatives for relocation and will be developed in consultation with affected households and relevant authorities.
Cultural sites within the area of tenement as per the map will need to be addressed properly. There are some cultural sites that are not commonly known by common people. E.g. single or one-man royal graves especially within TA Malili. These sites are known by very few people from historical facts.	Mr	Robert I. Kawiya	Malingunde/Malili Community Member	08/01/2018	Registration and Comment Form	Noted, specialists will undertake an archaeology and cultural heritage impact assessment in consultation with stakeholders in the area to identify relevant features.
Commitments and promises made must be honoured.	Mr	Moses Mkumpha	Officer in the Department of Culture (Antiquities)	10/01/2018	Registration and Comment Form	Noted.
The information (BID) which was distributed by the stakeholder engagement office was shared with our network to help us get more input from civil society organisations (CSOs). However, we were wondering if you could share with us the presentation you made at one of your meetings in Lilongwe and any document regarding your proposed ESIA. I was tasked, with a colleague to solicit comments from the network for the ESIA	Ms	Cynthia Simkonda	Centre for Environmental Policy and Advocacy: Programme Officer – Natural Resources and PWYP coordinator of the Malawi chapter	16/01/18	Email	The presentation delivered at the meetings held in December 2017 was forwarded to Ms Simkonda, together with an explanation that the next document for comment will be the draft scoping report which will be available in March 2018 for review.

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process.						
The project is welcomed as it may transform Malawians if proper procedures will be followed and if the ESIA will be done in the right manner.	Mr	McStaford Zindondo	Concerned citizen from Malingunde and member of FOMA	02/02/18	Registration and Comment Form	Noted.
Resettlement should be done properly considering that a new settlement should be a place of equal value to the present place with a better environment.	Mr	McStaford Zindondo	Concerned citizen from Malingunde and member of FOMA	02/02/18	Registration and Comment Form	A separate resettlement planning process, culminating in a RAP, will be undertaken as part of the ESIA process. Resettlement planning will be undertaken in compliance Malawian legislation, and following good international industry practice (GIIP), which includes extensive and on-going consultation with the resettlement-affected households. The principles of GIIP will be adhered to, which includes the notion that nobody should be worse off after resettlement than before. All aspects of the resettlement planning process will be done in consultation with the relevant authority figures and households who may be displaced, including the selection of a resettlement site, if required.
Part of the compensation of landowners should be shares in the operating mining company in order for the land to benefit the landowners. A huge amount of money once-off assists in the short terms, but shares have a longer term benefit.	Mr	McStaford Zindondo	Concerned citizen from Malingunde and member of FOMA	02/02/18	Registration and Comment Form	Compensation of affected communities will be undertaken according to the requirements of Malawian legislation and international best practice.
At what level are you in terms of your graphite project at Malingunde in Lilongwe?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	Sovereign is currently conducting a number of technical studies, which will culminate in a feasibility study, to determine the viability of developing the Project.

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						Should the feasibility studies prove that mining is viable, a decision on whether to proceed with development will be taken by Sovereign during the last quarter of 2018, and an application for a mining licence submitted to the Department of Mines. In addition, environmental authorisation from the Environmental Affairs Department (EAD) will be required in terms of the Environment Management Act (EMA), (Act No 19 of 2017) before development of the Project can proceed.
Are the communities aware of your intentions or undertakings in the area?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	Yes, an environmental and social impact assessment (ESIA), which forms part of the feasibility studies (as mentioned above) is currently being undertaken for the Project. A key component of the ESIA is to consult with stakeholders and communities. The main aims of the stakeholder engagement process are to provide stakeholders with Project information and identify issues and concerns of importance to them. These issues and concerns will be assessed in more detail through the specialist studies undertaken as part of the ESIA. Several rounds of consultative meetings will be held as part of the process. The first of these meetings were held in December 2017 as part of the announcement of the ESIA process. The purpose of these meetings was to introduce the project team to stakeholders, as well as provide them

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						<p>with information regarding the Project and the ESIA process.</p> <p>Upon completion of the environmental scoping report, further meetings will be held with stakeholders in March 2018 to present the key issues, potential impacts and scope of the various specialist studies that will be undertaken. These meetings will be advertised, and stakeholders will receive notice of where and how they can view a copy of the draft environmental scoping report. This document is part of the process to provide stakeholders with information so that they can participate by asking questions and raising concerns. Stakeholders will also be provided with an opportunity to review and comment on this document.</p> <p>After the completion of the scoping phase, a range of specialists will conduct their assessments, the findings of their work will be documented and a draft ESIA report will be available for stakeholder review. Meetings will again be held to share the specialist findings, the impacts and mitigation measures described in the report, and to obtain stakeholder comments. Notice of the proposed meetings in this phase will also be provided to stakeholders.</p>
You have already taken some samples from the area and you have planted some *metal*	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	Samples have been taken in the area since 2016. The samples were collected

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like structures in some crop fields and other bare grounds in the area what are these for? And how long will this be there?						<p>through drilling and used to model the graphite resource and also for metallurgical studies. A portion of the samples was sent for chemical analysis and the remainder stored in Lilongwe. All samples were exported after inspection and the issuing of an export permit by the Department of Mines. Results from the chemical analysis were provided to the Department of Mines.</p> <p>The metal structures are dust monitoring devices which are used to collect baseline information on the existing dust levels in the area. The monitoring of dust levels forms part of the ESIA and will be used to model the impact on dust in the area from potential mining activities. Samples are collected monthly and transported to a laboratory for analysis. This monitoring is expected to continue for several more months.</p> <p>Permission was obtained from the community to place the dust monitoring devices where these are currently located.</p>
Before planting these drilling sites did you engage the community? What has been their reactions?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	Before the commencement of every drilling program a meeting is held with the community in the area where drilling may take place. A meeting was held on 26 October 2017 prior to the latest drilling program. The meeting was chaired by the District Commissioner's (DC's) office and a representative of the Department of Mines was also present. During the

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						meeting, it was explained what Sovereign intended to do and what the purpose of the drilling program was. It was also explained, as was the case during previous programs, that land owners would be paid a disturbance allowance for inconvenience that may be caused and that the process of establishing such an allowance, and the payment thereof, would be handled by the DC's office. Community members were provided an opportunity to ask questions and concerns. At the time, there were no objections from the community related to the drilling program. Sovereign has always endeavoured to have a good working relationship with the community.
Some affected communities claim that they were paid amounts ranging between MK 700 to MK15000 as compensation/consolation/payment for using their land - or for the damage caused to their crops or land? Could you confirm this?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	Drilling occurred largely before fields were prepared and planted, although there were some cases where prepared fields had to be entered. After the drilling sites were identified, Land Officers from the DC's office assessed the area that would be impacted and calculated a disturbance allowance accordingly. The disturbance allowance was based on the size of the area as well as the status of the field. Land owners were paid their disturbance allowances before drilling occurred. After drilling, the machines were removed and a rehabilitation team made sure that the field was restored to its previous status. It must be noted that the drilling equipment is normally present for about an hour or two, which is the

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						time it takes to drill a hole. Disturbance allowances paid ranged from K1,000 to K60,000 depending on the size of the area disturbed and the status of the fields.
And now there is general fear among members of the community that they may lose land or resettled - how are managing public/community expectations since you are simply exploring?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	<p>Sovereign will undertake a study to identify which communities/villages/people may be impacted and/or need to be relocated and what compensation will need to be paid. The exact communities or individuals affected will only be known once the preferred mining option has been selected.</p> <p>Any required relocation or resettlement will only take place after a decision to develop the mine has been made, a resettlement action plan agreed to by all parties and a mining licence has been granted.</p> <p>Resettlement and compensation, if required, will be carried out in accordance with relevant Malawian legislation, including the Land Acquisition Act (as amended). Guidance on resettlement planning, implementation and compensation will also be sought from the guidelines provided by the International Finance Corporation (IFC), representing international best practice. This includes the preparation of a resettlement action plan (RAP), which is done in consultation with each potentially affected individual and household. This</p>

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						RAP will have to be approved by the Ministry of Lands, Housing and Urban Development before anyone can be resettled.
Other stakeholders such as CSOs who are on your mailing list are complaining of information gap - you are locally giving out too little information compared to what you have declared on Australian Stock Exchange?	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	<p>The BID is the only information which has been provided to all stakeholders. The BID conveys the objective of the ESIA process and which documents will be made available for review at the different phases in the process. Different documents are made available as the study progress and more information becomes available. The next document which will be made available is the environmental scoping report. Please refer to the BID for more information about the report.</p> <p>Market announcements to the Australian Stock Exchange (ASX) generally serve to provide information to existing and potential shareholders or investors, and may potentially affect the price or value of the company's securities (or share price). It therefore serves a different purpose to information communicated during the ESIA process. This information is available on Sovereign's website and where relevant will be incorporated in the environmental scoping and ESIA reports.</p>
The need for open and ongoing information including disclosure of the background and experience of SVM cannot be overemphasised.	Mr	Billy Mayaya	Development Art Consultancy	31/01/2018	Email	<p><i>The need for open and ongoing information including disclosure of the background and experience of SVM.</i></p> <p>Sovereign Metals Limited (SVM) is an</p>

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<p>This includes transparency about the scoping study phase which must INCLUDE the full participation of communities in Malingunde. No such evidence has been seen so far.</p> <p>Additionally there is no evidence of attempts on SVMs part to sign a memorandum of understanding to set in place parameters for a community development agreement between SVM and communities in Malingunde to ease the process of informed consent, and create a joint grievance system and conflict management mechanism.</p>						<p>Australian publicly listed company that trades on the Australian Securities Exchange (ASX) under the code ASX:SVM. SVM is engaged in exploration, identification and appraisal of resource projects, with the main focus being its 100% owned Malingunde Saprolite-hosted Graphite Project. Other interests include the Duwi Flake Graphite Project in Malawi, as well as the Carpentaria Joint Venture, a joint venture with Mount Isa Mines in Australia.</p> <p>SVM forms part of the Apollo Group of companies, which have had considerable success in identifying and acquiring world class projects in commodities such as gold, coal, uranium, iron ore, and base metals. Apollo Group has then guided these projects through exploration, feasibility and development phases by ensuring they have the necessary management and technical skills, investor support and funding from capital markets.</p> <p>As a publicly listed company, SVM adheres to the requirements of producing quarterly reports, half yearly accounts and annual reports, which detail its activities and financial position, and these are published on SVM's corporate website at http://sovereignmetals.com.au. SVM has engaged a reputable and suitably qualified external auditor to undertake</p>

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						<p>external audits as required.</p> <p>The Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves ('the JORC Code') is a professional code of practice that sets minimum standards for public reporting of mineral exploration results, mineral resources and ore reserves.</p> <p>The company reports to a Board of Directors that is responsible for guiding and monitoring SVM on behalf of shareholders by whom they are elected and to whom they are accountable. The Board of Directors currently consists of 3 members, namely:</p> <ul style="list-style-type: none"> • Mr Ian Middlemas (Chairman) • Dr Julian Stephens (Managing Director) • Mr Mark Pearce (Non-executive Director) <p>Collectively the Board of Directors have over 80 years of experience in the resources sector. The responsibility for the day-to-day operation and administration of the Company is delegated by the Board to the Managing Director. The Board ensures that the Managing Director and the management team is appropriately qualified and experienced to discharge their responsibilities and has in place procedures to assess the performance of the Managing Director and senior staff.</p>

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					<p>The management team at SVM consists of 4 members and includes:</p> <ul style="list-style-type: none"> • Dr Julian Stephens (Managing Director) • Mr Andries Kruger (Country Manager – Malawi) • Mr Dominic Allen (Business Development Manager) • Mr Matthew Wheeler (Technical Manager) • Mr Clint McGhie (Company Secretary) <p>The management team has extensive experience in the resources sector. In addition to these team members, SVM appoints a variety of personnel with specific expertise as and when required.</p> <p>Various documents are publicly available on the internet pertaining to both SVM and the Apollo Group of companies for further information.</p> <p><i>Transparency about the scoping study phase which must INCLUDE the full participation of communities in Malingunde. We haven't seen any evidence of this so far.</i></p> <p>Sovereign is currently conducting a number of technical studies, which will culminate in a feasibility study, to determine the viability of developing the natural flake graphite deposit at</p>

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						<p>Malingunde. In addition to the feasibility study, Sovereign has commenced an environmental and social impact assessment (ESIA) process as required in terms of the Environment Management Act (EMA), (Act No 19 of 2017). It should be noted that a scoping study is undertaken as part of both the feasibility study and the ESIA, and these are two distinct and separate studies.</p> <p>Exploration programs over the last three years have involved hand auger, aircore and diamond core drilling. This culminated in 2017 with the definition of a large graphite resource, as defined under the JORC Code (2012) of 28.8 Mt @ 7.1% TGC (total graphitic carbon). The company understands this to be the largest reported saprolite-hosted (soft clay) graphite resource in the world.</p> <p>In mid-2017 the company completed an initial economic scoping study which showed that the project has the potential to profitably produce about 44,000 tonnes of graphite concentrate per annum. The purpose of economic scoping study is to determine whether the project is likely to be economically viable, consider the potential infrastructure and processing requirements, and identify risks and opportunities to the Project. This economic scoping study is technical in nature and undertaken at a high level.</p>

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						<p>There are no requirements to liaise with stakeholders as part of this study and this report is not a public document, unlike the report that is compiled as part of the environmental scoping study.</p> <p>The environmental scoping study is the first phase of the ESIA process. An environmental scoping report (ESR) and terms of reference (ToR) will be compiled, which details:</p> <ul style="list-style-type: none"> • Existing Project information available. • Available environmental and social characteristics of the Project area. • Potential environmental and social issues and concerns raised by stakeholders. • Potential environmental and social issues and impacts that require further assessment. • The terms of reference (ToR) for the studies to be undertaken to support the assessment of environmental and social impacts. <p>A key component of the ESIA (and the environmental scoping study) is to consult with stakeholders and communities. The main aims of the stakeholder engagement process are to provide stakeholders with project information and identify issues and concerns of importance to them. Several rounds of consultative meetings will be held as part of the ESIA process. The first of these meetings were held in</p>

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						<p>December 2017 as part of the initiation phase. The purpose of these meetings was to introduce the project team to stakeholders, as well as provide them with information regarding the Project and the ESIA process.</p> <p>Upon completion of the ESR, further meetings will be held with stakeholders to present the findings of the report and identify further issues and concerns. Stakeholders will receive notice of where and how they can obtain a copy of the draft ESR, and will also be invited to attend these meetings. This document is part of the process to provide stakeholders with information so that they can participate by asking questions and raising concerns. Stakeholders will also be provided with an opportunity to review and comment on this report.</p> <p>Further stakeholder engagement will take place throughout the ESIA process.</p> <p><i>Additionally there is no evidence of attempts on SVMs part to sign a memorandum of understanding to set in place parameters for a community development agreement between SVM and communities in Malingunde to ease the process of informed consent, and create a joint grievance system and conflict management mechanism.</i></p> <p>As previously communicated during the</p>

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						<p>stakeholder engagement process, a decision to proceed with development of the Project has not yet been taken. SVM is currently still engaged in exploration, and as part of the feasibility studies, commenced a pre-feasibility study (PFS) in late 2017 which is scheduled for completion in June 2018.</p> <p>If the results of the PFS are favourable, it is expected the company will be able to commence a DFS (Definitive Feasibility Study) in the second half of 2018 which would likely be completed in the first quarter of 2019. Should the feasibility studies prove that mining is viable, and a decision is taken by SVM during the late 2018 or early 2019 to proceed with the development of the mine, an application for a mining licence will be submitted to the Department of Mines.</p> <p>SVM will take the suggestion of a community development agreement under advisement. In this respect, the Company awaits the promulgation of the new Mines and Minerals Act through parliament in order to provide guidance.</p> <p>Apart from compliance with relevant Malawian legislation, the ESIA process for the Project will also comply with the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012) and the Equator Principles (2013).</p>

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					Specifically, Principle 6 of the Equator Principles includes requirements for establishing a grievance mechanism based on an understandable, culturally appropriate and transparent consultative process. A grievance mechanism is currently being developed by SVM and all affected communities and groups will be made aware of the Project feedback and grievance mechanism, once finalised.
Clear communication about the responsibilities of the company vis-à-vis the government (Central, District, Dept of Mines, EAD, Lands, etc.) should be articulated with different stakeholder groups using differentiated, appropriate channels. Many are not aware of where the responsibility/ies lie (e.g. compensation, resettlement, access to information).	Ms	Rachel Etter-Phoya	10/02/2018	Registration and Comment Form	Noted.
The passage of legislation to replace the 1981 Mines and Minerals Act is uncertain (and regulations are in draft form). However, should it pass, community development agreements will be introduced as a requirement for companies holding large-scale mining licences. The 'qualified community' as defined by law is vague and includes people living up to 20 kilometres of the mine site boundary (if my reading of the draft is correct). Will the ESIA process consider how best so-called qualified communities can be identified/delimited?	Ms	Rachel Etter-Phoya	10/02/2018	Registration and Comment Form	SVM will undertake a detailed review of the requirements of the new Mines and Minerals Act once this has been promulgated. Requirements for a development agreement will only be incorporated into the process where necessary once the new legislation is enacted.
What methods and methodologies will be used to understand potential social impacts? And especially to understand 'the social and	Ms	Rachel Etter-Phoya	10/02/2018	Registration and Comment Form	The methodology for the SIA will include the following primary data collection activities in the Project Area of Influence

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socio-economic fabric of a particular community and any social change process that may be associated with any project' (Environmental Management Act 2017, Part I(2)).						<p>(Aol):</p> <ul style="list-style-type: none"> • Semi-structured interviews with key informants, including national and local government, community representatives and other stakeholders • Focus group discussions with Project affected community members and members of vulnerable groups • Participatory mapping, to be undertaken during interviews and discussions, to elicit information about relevant features, values and resources in the Project Aol. <p>In addition, village-level profiles of settlements in the Aol will be compiled to enable the differentiation of the type and significance of impacts likely to be experienced by different social receptors.</p>
Will at least some of the project alternatives be outside the Kamuzu Dam watershed? (Especially the TSF)	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	Various options for the location of Project infrastructure is being considered (i.e., waste rock dump, tailings storage facility, processing plant). Some of these locations are located outside of the watershed that contributes to the Kamuzu Dam II. The various options will be evaluated, and depending on the final positions selected, some of these may fall outside of this watershed.
Will the ESIA take into account existing/potential expansion plans of Kamuzu Dam?	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	A meeting was held with the Lilongwe Water Board during December 2017 to discuss the Project and to understand the existing and potential expansion plans of the Kamuzu Dam. The ESIA will consider this information where relevant.

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Who will be responsible for implementing and financing mine closure and rehabilitation? Will there be a financial guarantee in place (environmental bond) by the company?	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	The developer of the proposed mine will be responsible for rehabilitation and closure at the end of the life-of-mine, including making financial provision for these activities.
How will AECOM/C12 ensure that stakeholder groups, such as women in the proposed project area, are included in the ESIA process and review? Limited research in Malawi relating to the extractives shows that women have been excluded because of the approach and process adopted by companies in the past (cf. Human Rights Watch 2016, “They Destroyed Everything: Mining and Human Rights in Malawi”)	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	Women, especially at household level are included in the consultation process. During meetings held in December 2017, a number of women representing their community attended meetings. Special effort will be made through the consultation process of the ESIA to ensure that women (and all vulnerable stakeholder groups) are consulted.
Does Sovereign plan to make easily and readily accessible to the public its environmental and social monitoring reports should the project go ahead? (Rather than relying on the EAD to be the sole provider of environmental monitoring information)	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	Mechanisms for engagement of stakeholders during implementation of the Project have not yet been developed. However, special consideration will be given to this prior to construction (in the event that a decision is taken to proceed with the Project).
Does Sovereign plan to join any voluntary standards/organisations to guide and implement best practice in environmental and social management (beyond complying with the IFC Guidelines and Equator Principles)? (e.g. the Global Reporting Initiative, the International Council on Mining & Metals)	Ms	Rachel Etter-Phoya		10/02/2018	Registration and Comment Form	No decision has been taken yet on membership of voluntary standards/organisations. Sovereign will consider this suggestion in more detail..
NRJN understands that Sovereign Metals Limited (Investor) has contracted Dhamana Consulting, AECOM, and C12 to conduct technical studies to inform a feasibility study to determine the viability of developing the natural flake graphite deposit at Malingunde on the Lilongwe Plain as it develops the			Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Noted. The ESIA process undertaken will comply with international standards. A transparent process is followed to identify and assess potential impacts, and to develop measures to minimise risks and manage potential environmental and social impacts.

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<p>Environmental and Social Impact Assessment (ESIA). Available evidence shows that mining of graphite in Malingunde will cause instabilities to the environment, economic and social aspects in the area. NRJN proposes that measures should be taken to minimise risks and manage environmental impacts that the proposed project will bring. Overall, NRJN recognises that in order to achieve proper environmental management and address social concerns, ESIA processes should be an ongoing commitment from the investor, in order to achieve continuous improvement and enhanced environmental and social performance at Malingunde. NRJN recommends a robust ESIA to be conducted taking into account the environmental sensitivity of Malingunde.</p>					
<p>NRJN understands that crucial to the development of any mine is the consideration of the environment surrounding a mine site. Key asks on whether the proposed mine takes into consideration environmental issues are:</p> <p>How does the investor plan to mitigate the adverse effects that mining will inevitably have upon the environment in general and upon the community in particular?</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>The ESIA will identify and assess the adverse impacts, as well as potential benefits the Project may have. Feasible and practical mitigation and management measures will be developed and included in the ESIA report to ensure impacts are minimised. At the same time, measures will be proposed to enhance potential benefits to communities.</p>
<p>We note the close proximity of freshwater sources to the mining site. Whilst that may be beneficial for the mine, what precautions will be taken to prevent seepage of toxic tailings into fresh water sources and the water table?</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>Engineering, as well as surface and groundwater studies will be undertaken to characterise the water sources in close proximity to the Project; identify the risk of seepage from tailings and other infrastructure; assess the potential</p>

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					impacts on surface and groundwater sources; and identify management measures and strategies to minimise the risk of contamination.
What measures will be taken to protect the environment from discharges of toxic elements in case of earthquakes, floods, and other natural disasters?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Specific measures to protect the environment from natural phenomenon and disasters have not yet been identified. However, engineering studies will take cognisance of these and ensure that infrastructure is designed according to relevant industry standards.
What happens if the mine suddenly has to be abandoned due to market forces (like Kayelekera due to low uranium prices)? Will the safety measures still cope with the possibilities of overflow discharges?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	As part of the conceptual rehabilitation and closure plan that will be compiled for the Project, strategies will developed to manage infrastructure and activities in the event of sudden closure or suspension of operations. In addition, a monitoring program will be put in place during the operations and closure of the Project to ensure potential issues are identified as soon as possible. The period of monitoring post-closure will be agreed with relevant regulatory authorities.
Will the exit strategy - either at end of life of mine or before, provide for the restoration of the environment to its pristine state?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Various options will be considered as part of the rehabilitation and closure plan that will be developed. The nature and extent of rehabilitation and the end land-use have not been identified yet.
Will the investor issue an Insurance bond to cover costs of refurbishing the environment in case of abandonment or other disaster or at the end of life of mine?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	The developer of the proposed mine will be responsible for making financial provision for activities that will be undertaken as part of closure of the Project.

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Will the proposed mine disturb vegetation and animal life? Need to propose measures to address such		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Vegetation clearance will be required as part of construction and operations, and may result in disturbance to animals. Mitigation measures will be developed as part of the ESIA to ensure impact on these are minimised to the extent possible.
What are the measures put in place to prevent pollution and the treatment of wastes to avoid contamination?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Detailed studies will be undertaken to assess the potential nature and extent of contamination. Mitigation measures will be developed as part of the ESIA to ensure impacts are minimised.
Are there any efforts proposed to promote the progressive reclamation and rehabilitation of land disturbed by mining		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	No specific strategies for progressive rehabilitation have been proposed yet. Various options will be considered as part of the rehabilitation and closure plan that will be developed.
Are there any proposed efforts to minimize the effects of mining on surface water and groundwater and on adjoining or neighbouring lands?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Detailed studies will be undertaken to assess the potential nature and extent of the impact on surface and groundwater resources. Mitigation measures will be developed as part of the ESIA to ensure impacts are minimised.
A need to conduct a baseline study to ascertain a true reflection of the current state. In this regard, we propose a baseline to be conducted which will form part of the scoping study. The scoping exercise will enable the investor to establish the existing conditions or standards against which the effects of the Malingunde graphite project will be judged.		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	A number of specialist studies will be undertaken to determine the baseline conditions in the Project area, as well as determine potential impacts associated with the implementation of the Project. The terms of reference of these studies are included in the environmental scoping report, which will be available for review from 5 March to 13 April 2018.
Women and children tend to suffer more when mining operations start which makes them more vulnerable with mining activities. Some of the negative impacts of mining on		Natural Resources Justice Network (NRJN) and the Publish What You	13/02/2018	Registration and Comment Form	Noted. Point number 1 to 3 will be considered as part of the Social Impact Assessment.

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<p>women include walking long distances to fetch for water due to contamination of fresh water bodies surrounding a mine. It has also been observed that most mining companies do not conduct a Gender impact assessment (GIA) for their projects. GIA helps in understanding women's needs within the context of extractive industries projects. This helps to look for practical gender needs and strategic gender needs in terms of access to resources and level of community awareness of gender issues and their dissipation in several processes. The investor should:</p> <ol style="list-style-type: none"> 1. Identify gender needs and propose ways of addressing the identified needs; 2. How women and children will be affected especially taking into account high probability of fresh water being polluted; 3. Measure how the quality and quantity of water will be affected and levels of dust to be experienced. 		Pay Malawi			
<p>To strengthen engagement with the indigenous people and local communities, there is a need for adequate information about the project to be provided to the indigenous people and local communities that will directly be affected by mining. The information to be provided shall be free of intimidation and influence and it shall be provided prior to the commencement of all activities. In a bid to promote human rights standards</p>		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	The ESIA will comply with good international industry practice (GIIP) will be adhered to, and where relevant, international guidelines and standards applied, including the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012). Performance Standard 1 requires free, prior and informed participation of affected communities.

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<p>and social concerns about the proposed mine, the following should be considered:</p> <p>Will the investor abide by Free Prior and Informed Consent (FPIC) principles - especially when it comes to consultation with local communities?</p>					
<p>Will the consideration of FPIC be included in the identification of community needs prior to implementation of the Corporate Social Responsibilities (CSR's) to ensure transparency and public trust? Include implementation timescales and scope of written agreements to facilitate monitoring and accountability.</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>Sovereign has not yet developed a CSR programme for the Project. As part of the SIA report a needs analysis will be conducted, which will form the basis of determining corporate social responsibility initiatives.</p>
<p>Will there be any specific provisions in the agreement that will directly benefit the local community at large? If so, what would those be?</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>Sovereign has not yet developed a CSR programme for the Project. As part of the SIA report a needs analysis will be conducted, which will form the basis of determining corporate social responsibility initiatives.</p>
<p>What mechanism (if any) has been developed to ensure that all members of the local community benefit from the allowances that will be distributed by the investor prior to, during and after the life of mine?</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>A mechanism for distribution of allowances has not been developed yet. This mechanism will be considered as part of the feasibility studies.</p>
<p>According to EIR 2003 report, 'Striking a Better Balance', EIR requires investors to implore higher standards for delivering social protections and benefits and to strengthen social requirements for its investment in extractive industries. This includes setting indicators to help track progress in ensuring that community's social life is not affected negatively by mining activities. NRJN understands that in the course of developing</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>A draft grievance mechanism is being developed and will be discussed with stakeholders during meetings planned in March 2018. A draft grievance mechanism is appended to the Environmental Scoping Report which is available for public review from 5 March to 13 April 2018.</p>

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<p>a mine, some people may lose farmland or may have to be resettled. NRJN has therefore proposed the following:</p> <p>Establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance.</p>					
<p>In addition, it appears that the local branch of the Lilongwe City Assembly Environmental Office has not been included in the briefings and thus cannot perform their duties pertaining to environmental protection.</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>The Lilongwe City Assembly Environmental Office will be approached and invited to become involved in the ESIA process.</p>
<p>Involve local development committees or CSOs in monitoring company's CSR initiatives to track progress.</p>		<p>Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi</p>	<p>13/02/2018</p>	<p>Registration and Comment Form</p>	<p>Monitoring mechanisms will be developed as part of the CSR programme.</p>

2. Comments Received on the Draft Scoping Report

Comments received on the draft scoping report will be included after the review period.