

APPENDIX A

LETTER FROM ENVIRONMENTAL AFFAIRS DEPARTMENT

Telephone: 01 771 111
Telefax No.: 01 773 379
Our Reference No.:EAD 99/07/05
Your Reference No.....

Communications should be addressed to:
The Director of Environmental Affairs



ENVIRONMENTAL AFFAIRS DEPARTMENT
LINGADZI HOUSE
CITY CENTRE
PRIVATE BAG 394
LILONGWE 3
MALAWI

29th June, 2017

The Managing Director
McCourt Mining Pty Limited
P.O Box 30523 CC3
Lilongwe

Dear Sir,

RE: Project Brief for Proposed Malingunde Graphite Mine, Lilongwe

Reference is made to your project brief that was submitted to the Department on 12th June, 2017 for review. I wish to inform you that the project brief was reviewed.

Based on the nature and scale of activities for the proposed project, I wish to inform you that you are required to conduct an Environmental and Social Impact Assessment (ESIA). Find attached Terms of Reference for undertaking the ESIA.

Should you require any further information or clarification on the foregoing, please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Shamiso'.

Shamiso Najira

FOR: DIRECTOR OF ENVIRONMENTAL AFFAIRS

Attd:

ESIA TERMS OF REFERENCE FOR THE PROPOSED MALINGUNDE GRAPHITE MINE PROJECT

1. Provide a full description of the nature/components of the proposed mine Project with respect to the name the proponent, postal address, aim and objectives of the project, the spatial location of the site for the project, the estimated cost of the project, the size of land for the project site, the number of people to work on the area (provide a breakdown of males and females, locals and non-locals), number of people to be residing on the project area.
2. Provide a site-specific visible map of the area (Scale 1:50,000) showing the proposed sites and (1:10,000) showing existing establishments in the proposed area and surrounding areas. A site plan for the project should be provided. All maps should be in color to portray the themes clearly.
3. Describe main activities to be undertaken in implementation of the proposed project at the site covering pre-construction, construction and operation phase. In the description include the type of machinery to be used, nature and quantity of wastes that will be generated, facilities for appropriate waste disposal and management of waste, estimated costs for the activities, expected type and number/quantities of graphite to be mined and the distance of the project from environmental sensitive areas.
4. Provide a concise description of the existing biophysical characteristics and the socio-economic environment status of the proposed area by identifying and analyzing:
 - Physical conditions: soil, geology, site topography, temperature, rainfall patterns and drainage system (water courses);
 - Biological Resources: scope of vegetative resources of the project area including riparian vegetation, extent of terrestrial and aquatic fauna;
 - Socio-economic conditions: demographic trend within and around the project area, main land uses, agriculture and marketing, business activities, basic infrastructure and health situation including description of HIV/AIDS prevalence rates; and
 - Any changes anticipated during implementation of the project area.
5. State the reason for selecting the proposed site of the project as opposed to other sites. Consider alternatives to the project, such as alternative sites and the reason for selecting the preferred option including the 'no

- project' alternative. The ESIA should also consider 'within – project' alternatives e.g. designs, technology etc.
6. Predict environmental impacts associated with the activities at and around the site, focusing on both the positive and negative impacts. The impacts should include:
 - Project location (e.g. loss of grazing pastures, impact on flora and fauna, impact on cultural site);
 - Project design (e.g. drainage problem and other structures);
 - Construction works (e.g. soil erosion, disposal of construction spoils); and
 - Project operation (e.g. impacts on soil, risk of water pollution, (conflict of natural resources use) phases of the project through its projected life.
 7. Prescribe the measures to eliminate, reduce or mitigate the negative effects identified and the measures to enhance the positive effects.
 8. Propose an Environmental Management Plan by which all of the measures prescribed in 6 above, will be carried out. Indicate the budget for the recommended mitigation measures, specifications of who will be responsible for these measures and the schedule when these measures will take place during construction and operation of the project.
 9. Propose an Environmental Monitoring Plan by which all mitigation measures recommended in Environmental Management Plan will be monitored. The plan should include the activities, frequency of monitoring, the key monitoring indicators, resources required and the authorities responsible for monitoring the exercises.
 10. Review the legal framework pertaining to the proposed project and indicate their impacts on the project. Reference should at least be made to the Environment Management Act, Mines and Mineral Act, Mines and Mineral Policy, Forestry Act, Water Resources Act, National Water Policy, National Environment Policy, Malawi National Land Policy, Public Health Act, Occupational Safety, Health and Welfare Act, Malawi Development and Growth Strategy other relevant policies and piece of legislation. Furthermore provide an account of all regulatory licences and approvals obtained for the proposed project to ensure that they are in line with sound environmental management practices and are in compliance with relevant existing legislation.
 11. Undertake stakeholder consultation to ensure key interested and affected stakeholders are involved in the Environmental Impact Assessment

- process. Incorporate their views in the report and indicate a record of consultations in the appendices parts of the report. EDO for Lilongwe should be fully aware of the proposed project.
12. The preparation, presentation and structure of the ESIA report should follow the format in the Guidelines of Environmental Impact Assessment for Malawi (1997) as stipulated on pages 33-37. The minimum content of required information in an ESIA Report is outlined in pages 53-59.
 13. In order to adequately address the core issues of the study. It is advisable that the team should at least be composed of:
 - ESIA expert
 - Social scientist
 - Geologist
 - Mining Engineer
 14. Submit 10 hard copies and soft copies of the ESIA report to the Director of Environmental Affairs.
 15. Provide the names of the EIA Team and their respective fields.

APPENDIX B

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 C

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>Crocidura cyanea</i>	Reddish-gray musk shrew	Least Concern
	<i>Crocidura 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 supercilialis</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>Creccopsis 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 D

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 Betty	Dube	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	Oswald	Mwamsamali	Department of Irrigation and Water Development
Mr	Alfred	Topeka	Department of Antiquities
Mr	Moses	Mkumpha	Department of Antiquities
Mr	Kelvin	Mphonda	Roads Department
Mr	Nicholas	Kamanga	CMA-CGM
Hon	Peter	Dimba	Member of Parliament: Malingunde
District Government			
Mr	Herbert C	Bolokenya	Lilongwe District Council - Environmental Inspection
Mr	Biswick	Mlaviwa	Lilongwe District Council - Environmental District Officer
Mr	James L	Mwenda	Lilongwe District Council - Lands Officer
Mr	Douglas	Moffat	Lilongwe District Council - Development Planning Director
Mr	Lawford	Palani	Lilongwe District Council
Ms	Sarah	Kandapo	Lilongwe District Council - Secretary
Mr	Joseph	Banda	Lilongwe District Council - District Water Officer
Ms	Patience	Jimu	Lilongwe District Council _ M&E and Planning
Ms	Gloria	Jeremiah	Lilongwe District Council - District Health Officer
Mr	Charles	Kalemba	Lilongwe District Assembly (DA) - District Commissioner
Mr	Samson	Chaziya	Lilongwe District Council - Chairman
Mr	Halima	Issat	Lilongwe District Council - Vice Chair
Ms	Loveness	Banda	Lilongwe District Council
Mr	Dumisani	Chiwala	Lilongwe District Council - Planning
Mr	John	Kawinga	Lilongwe District Council
Ms	Nevertheless	Kamchaha	Lilongwe District Council - Vice Chairperson: LLDC
Ms	Marvel	Tibu	Lilongwe District Council - DWDO: Water

Title	First name	Last name	Company / Organisation
Ms	Tamara	Bakili	Lilongwe District Council - Planning
Local Government			
Mr	Desmond	Bikoko	Lilongwe City Council - Mayor
Mr		Kwanjana	Lilongwe City Council
Parastatals			
Mr	Charles	Kachingwe	Lilongwe Water Board
Mr	Mavuto	Chintengo	Lilongwe Water Board
Mr	Bester	Kamwaza	Lilongwe Water Board
Mr	Denis	Kamwendo	Lilongwe Water Board
Mr	Oswald	Mwamsamali	National Water Resource Authority (NWRA)
Dr	Alexon	Chiwaya	Escom
Mr	Sharmey	Banda	Malawi Roads Authority (RA)
Mr	Francis	Dimu	Malawi Roads Authority
Mr	Allan	Kaziputa	Malawi Roads Authority
Traditional Authorities / Village Leaders			
TA		Masumbankhunda	
Mr	SGVH	Tanga	Village Tanga
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			
Mr	Kossam	Munthali	NRJN
Ms	Rachel	Etter-Phoya	Researcher
Mr	Moses	Makandawire	Publish What You Pay (PWYP)
Mr	Paul	Mvula	Publish What You Pay (PWYP)
Mr	Elyvin	Nkhonjera Chawinga	Oxfam Malawi

Title	First name	Last name	Company / Organisation
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	Havard	Hovdhaugen	Norwegian Church Aid
Mr	Thokozani	Mapemba	Norwegian Church Aid
Mr	Timothy	Mtambo	Centre for Human Rights and Rehabilitation (CHRR)
			Citizens for Justice
Ms	Simekinala	Kaluzi	Council for NGOs in Malawi (CONGOMA)
Mr	Talumba	Boleya	CONGOMA
			Malawi Environmental Endowment Trust
			Wildlife and Environment Society Malawi (Lilongwe Branch)
Mr	Keith	Matanda	Malawi Extractives Industry Initiative (Mweiti)
Mr	Abdul	Chiwalo	Malawi Extractives Industry Initiative
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	MCAG
Mr	Jones	Sichali	FOCUS
Hon	Alex	Major	MPCC - National Assembly
Mr	Rafiq	Hajat	The Institute for Policy Interaction
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

Title	First name	Last name	Company / Organisation
Mr	McStraford	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
Mr	Martin	Thondolo	Friends of Malingunde
Mr	Richard	Banda	Friends of Malingunde
Media			
Mr	Joseph	Dzuwa	Regional Informaiton Officer Centre
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
			Channel for All Nations TV
			Investor Magazine
			Malawi Broadcasting Corporation
			Maziko Radio Station
			Timveni Radio
			MISA 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
Mr	Karl	Chokotho	Malawi Confederation of Chambers of Commerce and Industry
Mr	Daniel	Tanner	International Conservation Caucus Foundation

APPENDIX E

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.

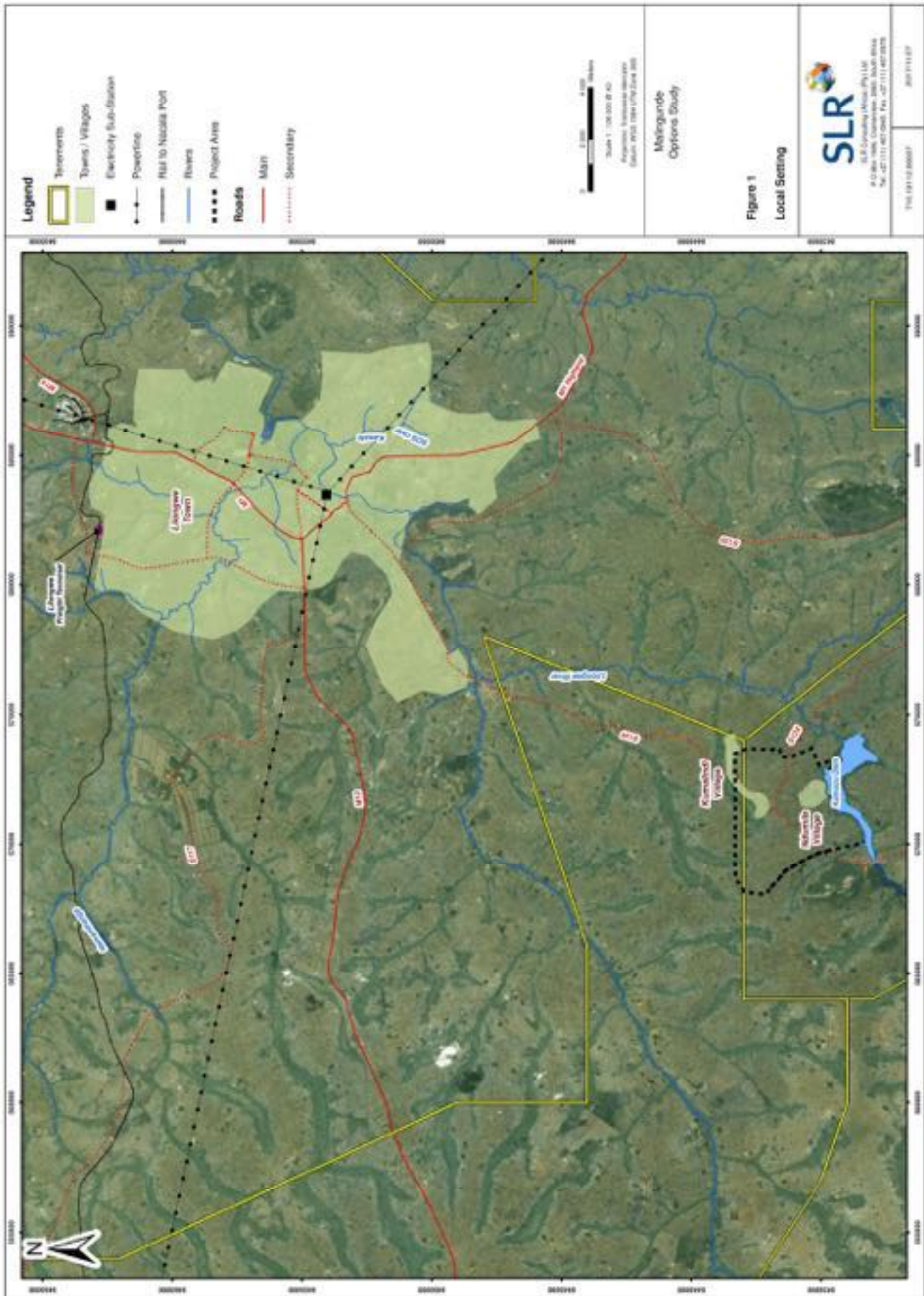


Figure 1: Malingunde Project Location

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.

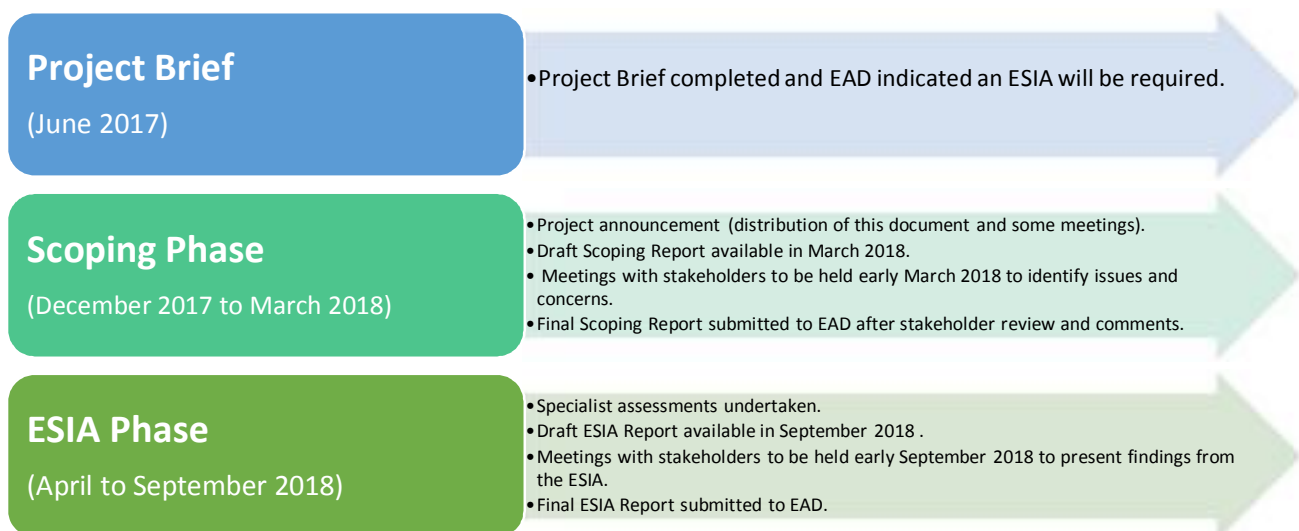


Figure 2: The phases of the ESIA process, proposed timeline of the phases and the main activities to be undertaken in each phase.

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 ungapadzatssegulidwe ku Malingunde ungapadzakhudzile 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 kakufotokoza mwa tsatanetsatane za mmene idzayendere ntchito ya kafukufuku wa momwe mchito ya M'godi omwe ungapadzakhazikitsidwe ku Malingunde, m'boma la Lilongwe ungapadzakhudzile 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 nthitoyi 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 yomwensho 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.

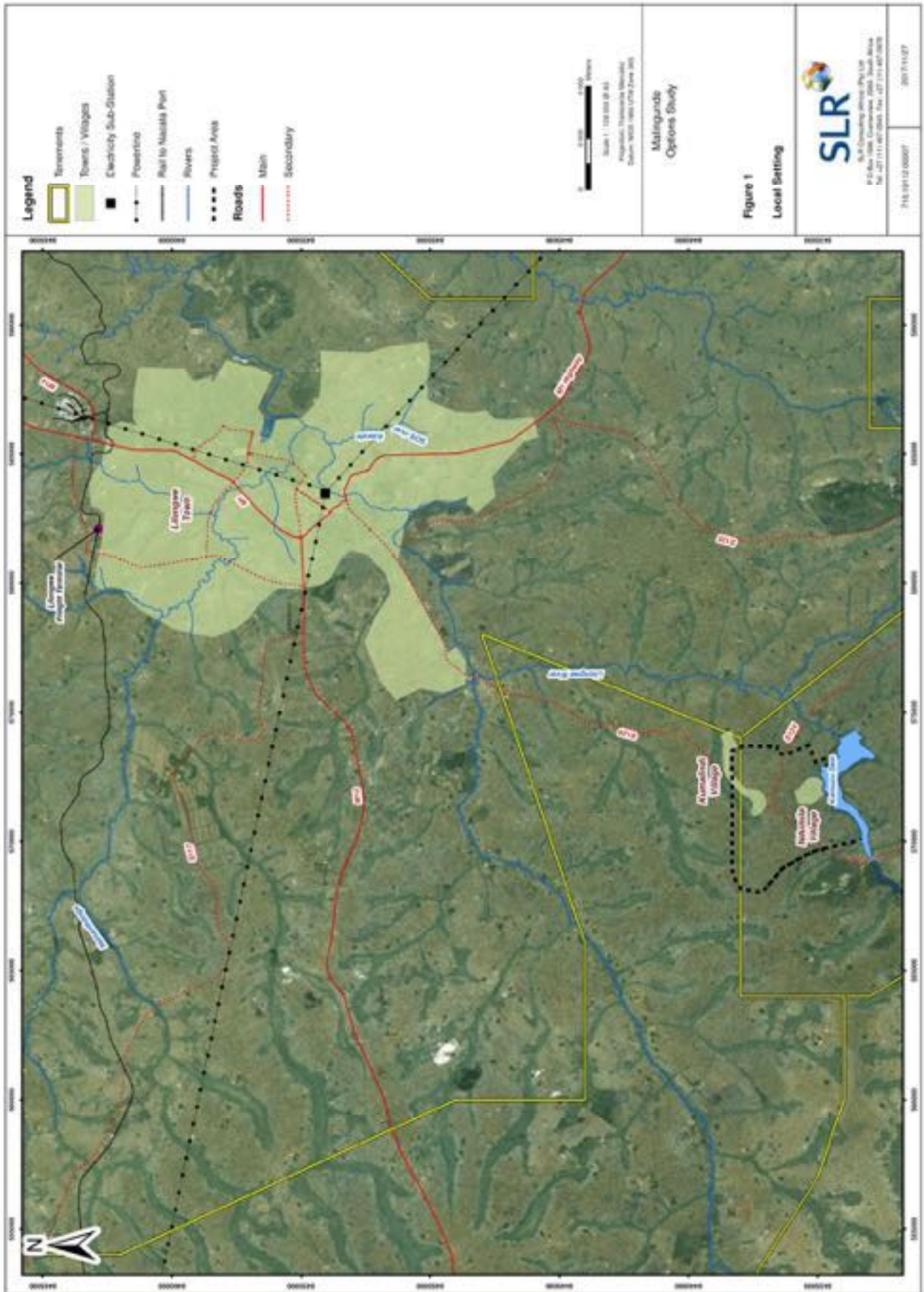
Ntchito zomwe zingadzagwilidwe ngati Mg'odiwu utadzatzegulidwa

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 ingakhudziye 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 ingadzakhudziye 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 chilengedwe 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 zisadzitse 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 ingadzakhudziye 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 nkhanu za chilengedwe 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 pansu 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 ungadzatsegulidwe 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'godiya isanakhazikitsidwe chonde tiuzeni momwe tingawapezere :		
Maina awo:		
Mudzi / Bungwe / Farm:		
(Keyala yawo) Address:		
	Telefoni:	
	Fax:	
	Foni ya mmanja:	
	Email:	

APPENDIX F

ATTENDANCE REGISTERS OF ANNOUNCEMENT MEETINGS (DECEMBER 2017)

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Monday, 4 December 2017 at 10:00




Boardroom: Ministry of Mines, Energy and Natural Resources

AECOM

Monday, 4 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Nanette Hittingh	Dharama	+61405429422	nanette.hittingh@dharama.com.au	
Tananga Nyirenda	Env. Affairs Dept	+265991989303	tanangan@nyirenda.com	
Patvide Nyirenda	EAD	+265881919563	medusnyirenda@gmail.com	
Dries Kruger	Sovereign	+265998957982	akrugar@sovereignmkt.com.au	
Karien Lotter	Aecom	+2784846869119	karien.lotter@aecom.com	

Monday, 4 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Nisile Mwaitsunge	EAD	+265 999 416636	nisile2002@yahoo.com	
Chimweme Nelson Bandaizi	Department of Mines	+265 888 308377	nbandaizi@gmail.com	
Gift Mwenye	Dept. of Mines	+265 882187539	mwenyegj@hotmail.com	

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Monday, 4 December 2017 at 14:00

Boardroom: Ministry of Mines, Energy and Natural Resources






AECOM

Monday, 4 December 2017



NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Karrien Lotter	AECOM	+27 84 686 9119	karrien.lotter @ aecom. com	
DINA LODGWE	CHAMBER OF MINES & ENERGY MALAWI	+265 999917109	longwedina@hotmail. com	
DEAN LUNGU	CHAMBER OF MINES & ENERGY MALAWI	+265 999952275	lungudean @ymail.com	
CRISTHIA CHILIMA	MW of LANDS, HOUSING & URBAN DEVELOPMENT	+265 999 493 175	c.chilima @ yahoo.com	
ALFRED TOPEKA MOSES MAKULA	ANTI QUITIES	0888850319	topekazamoyo@yahoo.com topekazamoyo@puro .com	



Monday, 4 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
MOSES MKUMPHA	ANTIQUITIES	099911029	mosesmkumpha@ yahoo.com	
Nanette Hattingh	Dhamara Consulting	+61405429422	nanette.hattingh@ dhamara.com.au	
MESTAFORD ZIMBARDI	FRIENDS OF MALANSA NDE	0880 0880586594	lusolamanga@ yahoo.com	
Clement Zimbardi	Friends of Malingunde	0999237909	Zimbardi@gnail .com	
HARRY PRONERA	Friends of Malingunde	0999350229	harrydower@gmail.com	

Monday, 4 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
JONES MALILI	FRIENDS OF MALI	094595155	jonesmalili@yahoo.com	
Hon. Peter Dimba	Member of Parliament for Malingunde II	0999586622	pdimba@gmail.com	

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Tuesday, 5 December 2017 at 10:00






Boardroom: District Council Office

AECOM



Tuesday, 5 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Norette Hatting	Dhanara Consulting	+6405429422	norette.hatting@ghanara.com.au	
Dries Kruger	Sovereign	+265 998957982	dkruger@sovereignmtds.com.au	
TREVOR NICOLLE	McCoy Hinisk	0999445021	trevor.nicolls@gmail.com	
HERBERT C. BOLONYA	LLDC Environmental Inspection	0999227693	CHINALO@OUTLOOK.COM	
BISWICK MLAVIWA	LILONGWE DISTRICT COUNCIL Environmental District Office	0995666134	bismlavisa@gmail.com	

Tuesday, 5 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
JAMES L. MURPHY	LILWING DISTRICT Council (Lands office)	0994558263	James.murphy@lilwings.govt.nz James.Murphy341@gmail.com	
Douglas Moffat	(DPP)	0999135976	Moffat Douglas @gmail.com	
Lawford Falani	11 (DC)	0888308880	lawford.falani@gmail.com E-governor.govt.nz	
Sarah Wendt	(Secretary) LL DC	099321209	aranga.wendt@rocketmail.com	
Joseph Banda Banda	(water office) Water LL DC	0888725688		

Tuesday, 5 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Patience Simu	LLDC (M&E)	0999458260	Patancesimu@gmail.com	
GLORIA JEREMIAH	LL DITO (D&H) District Health office	0999934523	Kantenga gloriakantenga@gmail.com	

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Wednesday, 6 December 2017 at 10:00

Offices of Lilongwe Water Board

AECOM

Wednesday, 6 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Nanette Hattigh	Dhamara Consulting	+614054291422	nanette.hattigh@ dhamara.com.au	
Korlen Lotter	AECOM	+27846869119	korlen.lotter@ aecom.com	
Bester Kamwaza	Lwb	0884126012	besterkamwaza bester.kamwaza@lwb.mw	
Mavuts Chintengo	LWB	+265 884830301	mchintengo@lwb.mw	
CHARLES KACHINGWE	LWB	0888264919	ckachingwe@lwb.mw	

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Wednesday, 6 December 2017 at 14:00






Country Lodge, Area 9, Lilongwe

AECOM




Wednesday, 6 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
BILLY MAYAYA	HUMAN RIGHTS ACTIVIST	0999204 249	mayaya9billy @yahoo.co.uk	
MATHEWS MARAFIA	Association of Environment Journalists	0999846 114	Mathemattom @yahoo.com	
Elyvin Nkhonjira	Oxfam	099274411	Enkhujira @ Oxfam.org.uk	
CHARLES MKOKA	A EJ/ ECOSYSTEMS PARTNERS & COMMUNICATIONS	0999452469	Charles.k@ gmail.com	
Howard Bowry	N/A Friends of Madingunde	0995433529	howardbowry2 @gmail.com	

Wednesday, 6 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
EDDY KALONGA	FRIENDS OF MALINGANE SPOKES PERSON (OFFICIAL)	0994661691 0886884980	eddykalonga@ hotmail.co.uk	
Agness Mpofo	Catholic Commission for Justice and Peace (CCJP)	0885672739	aggiempofo@ gmail.com	
Thushani Mopemba	Norwegian Norwegian club Aid	0882086 587	Thushani.Ma pemba@ nca.no	
Maxwell Mphyo	FRIENDS OF MALINGANE (Fomat)	0993937597/ 0884781978	mphyo.mwavello@ gmail.com	
MAX CHAONKERA	FRIENDS OF MALINGANE (Fomat)	0999587808 0885572441	Max Chaonkera @gmail.com	

Wednesday, 6 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
JONES MALILI	FRIENDS OF MALIWADE	09999 55155	jonesmalili@yahoo.com	
DED CHONDE	Friends of Maligund	0999 410983	chrismikii@gmail.com	
LAWRENCE NAWIYOTA	concerned citizen	0884412887	lgnwirahe@gmail.com	

ATTENDANCE REGISTER





Malingunde Graphite Project, Lilongwe District, Malawi

Thursday, 7 December 2017 at 10:00





Offices of the District Council, Lilongwe

AECOM






Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
S.G.V.H Tangga	Village Tangga	0995750366 0884529711		
G.V.H Chitsuko	V.H Chitsuko			
G.V.H Pifigene	V.H Pifigene			
REV L.M.N. HARA	MALINZUNDE CCAP Mission	0957333580 0881024203	leomndhar3@gmail.com	
G.V.H Nyundo	V.L.G Nyundo	0999494160		


Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
S GUN MASUGUNA	MASUGUNA	0999137580		
JELARD BELEMON	A.D.C. CHAIR	0884421516		
V.H KATAWA	MFUMU	0996601721		
V.H SAULANI	MFUMU	0996601721		
Fuka Masandira	Cherk Acc.	0999306335/ 0888366100		




Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
U.A. M. banyekela	MFumu	0881256487		
U.A. Kumalindi	MFumu	0995129171		
U.A. Kumalindi wafup:	MFumu	0995129171		
U.A. Kumalindi wantaki	MFumu	0995129171		
U.A. Nyozani	MFumu	0996601721		



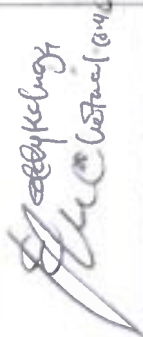


Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Jambetsani Somboni	A & C Member	0996328843		
Gabriel Kabango	ADC Vice Chair	0993582124		C. Kabango
Hardwell Kachule	YDC	0999 695112 088 6437390		H. Kachule
Tione Mphatsi	V.B.C Vice Chair	0991444557		T. Mphatsi
Verentina Chelata	V.D.C	0991705481		V. C

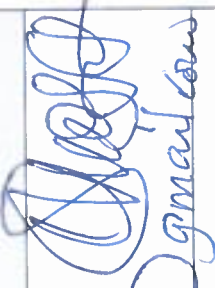




Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Flube mphambawire	V.D.C Chair	0996352332 0880266935		E. M
Everson Chikwa	V.D.C member			E. Chikwa
BISWICK MLAVIWA	LL DC	0995666134	bismilaviva@gmail.com	
TREVOR NICOLLE	McCourt Missing	0999445021	trevor.nicolle@gmail.com	
Loverness Banda	LL DC	0999222371	lovernessnema@gmail.com	

Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
HERBERT G. BROKENYA	LILONGWE DISTRICT COUNCIL	099922797	CHINALO@ OUTLOOK. COM	
Karien Lotter	AECOM	084686219	karien.lotter @aecom. com	
Maxwell Mphoyo	Friends of Machingunde Social welfare Chairman	0993937597 0884 781978	mphoyemaxwell08@ gmail.com	
E. KATUNDA	FRIENDS OF MATUNDA SPONSOR	0886 884980 994661691		
Howard Bowa	Friends of Machingunde Board Member of Trustees	0888966675 0995433529	howardbow992@ gmail.com	

Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Douglas Moffat	LCDO	0999135978	moffatdougls@gmail.com	
James Muenze	WDC	0999558263	JamesMuenze34@gmail.com	
NEBI CHONDE	FOMA	0999 410 923	chrismikii@gmail.com	
LAWRENCE NAWIRA	CIZIBEN	0884412887	Ingwirah@gmail.com	
LAWRENCE FALUK	LD D	0888308225	lawrencefaluk@yahoo.com	

Thursday, 7 December 2017

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Sarah Vandago	LLPSC	0999321209	anamaziya	
Nurette Hattirgh	Dhanava Consulting	+61405429422	anamaziya@rocketmail.com	[Signature]

APPENDIX G

COPIES OF PRESENTATIONS GIVEN AT STAKEHOLDER CONSULTATION MEETINGS

Malingunde Graphite Project

Environmental and Social Impact Assessment (ESIA)

**Stakeholder Information Meetings to Announce the
Commencement of the ESIA Process**

4 – 8 December 2017

Lilongwe, Malawi

Overview

- Project team and roles
- Purpose of meetings
- Project background, location and description
- ESIA status and process

Project team

– Sovereign Metals

(Developer)

- Andries Kruger
- Reidwel Nyirenda

– Aecom

(Social studies and stakeholder engagement)

- Karien Lotter
- Anelle Lotter

– Dhamana Consulting

(Principal Environmental Consultant)

- Nanette Hattingh

– C12

(Social studies and stakeholder engagement)

- Akeel Hajat
- Arthur Kambombe
- David Mussa

AECOM

The role of Dhamana Consulting, AECOM and C12

- Dhamana Consulting, AECOM and C12 are consulting firms with international experience in undertaking environmental and social studies and have been commissioned by Sovereign Metals to undertake the ESIA process for the project.
- Dhamana Consulting, AECOM and C12 have no private interest in the proposed Malingunde Project and operate independently to reflect both the interests and concerns of stakeholders and the mine.

AECOM

Purpose of the meeting and discussion points

1. **Share information** about the proposed Malingunde Project and the ESIA process
2. **Discuss the *best approach for engaging stakeholders*** during the ESIA

Discussion points

- Background to the proposed Malingunde Project
- Proposed activities
- Overview of ESIA process and timeframes
- Proposed stakeholder engagement and communication

AECOM

Background to the Malingunde Project

Who is McCourt Mining and Sovereign Metals?



- Sovereign Metals Limited is an Australian publicly listed company primarily focussed on exploring for and developing natural flake graphite deposits in central Malawi.
- The Exclusive Prospecting Licence (EPL) covers an area of approximately 1 245km² on the Lilongwe Plain in which the Malingunde project is located.
- McCourt is the applicant for the environmental authorisation for the Malingunde project.

AECOM

Background to the Malingunde Project

What is proposed?

- Studies undertaken to date indicate that the natural flake graphite deposit at Malingunde can yield ~ 44 000 tonnes of graphite concentrate per annum over an initial life-of-mine (LOM) of 17 years.

Graphite is used for the production of:

- magnesia-carbon bricks used in the steel industry
- rechargeable lithium-ion batteries for cell phones, laptops and electric vehicles



The proposed Malingunde Project is located 15 km southwest of Lilongwe Boma, and falls within the Lilongwe District of the Central Administrative Region



AECOM

Background to the Malingunde Project

Location of the proposed Malingunde Project



- Project area will be ~ 300 □ 400 hectares in size
- 25 km from operating rail
- 20 km from a power station
- Near a potential water source
- 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

AECOM

Background to the Malingunde Project

Proposed activities

- Open pit mining with traditional excavator and haul trucks will be used to mine the ore
- No drilling and blasting will be required
- Pits will be a maximum of 25 m deep and 150 m wide
- Excavated ore will be transported to the processing plant for treatment (scrubbing and flotation)
- The processed product will be transported on truck for 26 km to Kanengo train station (north of Lilongwe Boma) from where it will be railed to Nacala port in Mozambique for export.



AECOM

Background to the Malingunde Project

Proposed infrastructure

- A number of ore pits
- Waste rock dump
- Tailing storage facility
- Low grade stockpile
- Ore processing plant
- Access roads to site
- Raw water storage dam, process water storage dam, dirty water storage dam and site water management infrastructure
- Workshops to service mining vehicles
- Diesel fuel storage and filling stations for mine vehicles
- Administration buildings, offices, ablution facilities and crib rooms



Infrastructure location proposed for the northern extend of the project area, but the location will be informed by the studies undertaken

AECOM

Environmental and Social Impact Assessment (ESIA)

Status

- Project Brief was completed and the Environmental Affairs Department (EAD) indicated in June 2017 that an ESIA is required in terms of 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 ESIA is undertaken in compliance with the Malawian legislation, the International Finance Corporation (IFC) Performance Standards and 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

AECOM

Environmental and Social Impact Assessment (ESIA)

What is an ESIA all about?

To identify and assess likely environmental and social impacts, and propose appropriate mitigation and management measures, as well as monitoring protocols.

Project Brief
(June 2017)

- Project Brief completed and EAD indicated an ESIA will be required

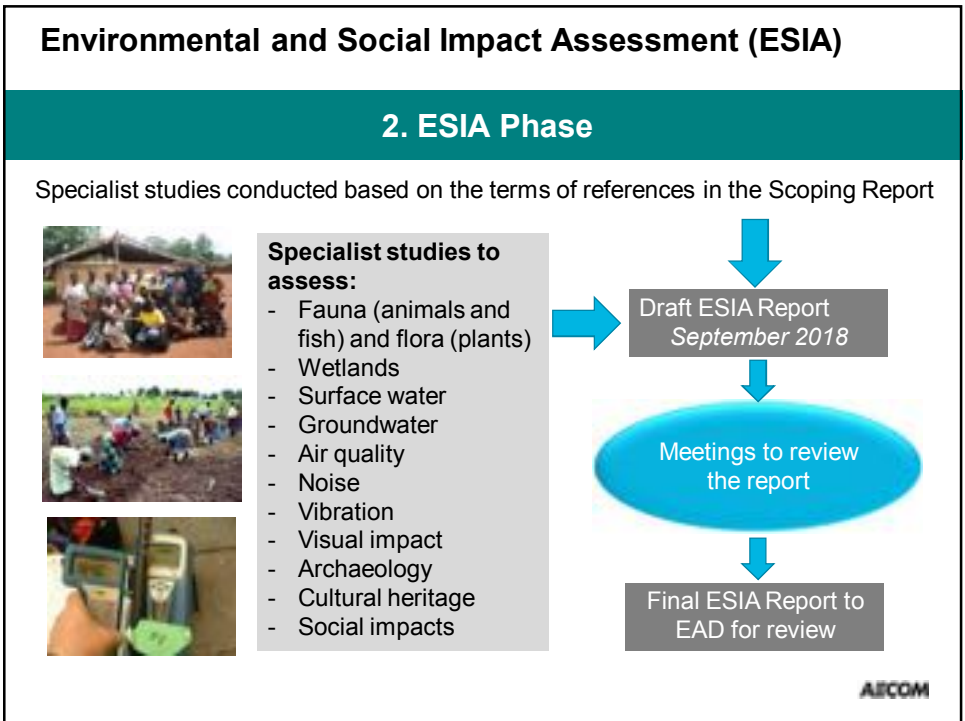
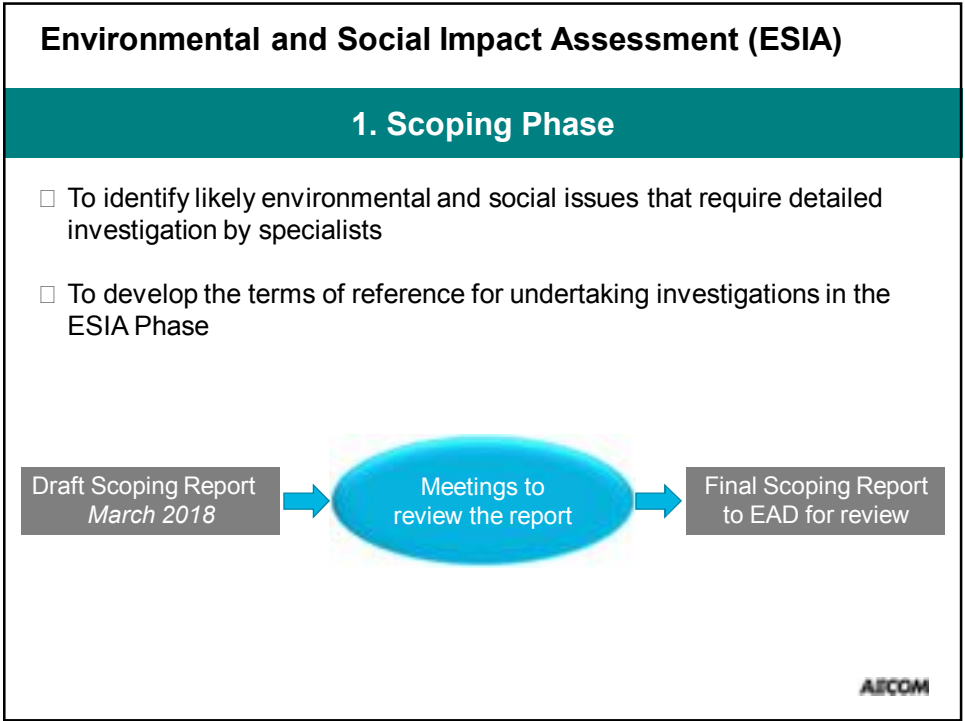
Scoping Phase
(December 2017 to March 2018)

- Project announcement
- Draft Scoping Report - March 2018
- Meetings
- Final Scoping Report to EAD

ESIA Phase
(April to September 2018)

- Specialist assessments undertaken
- Draft ESIA Report - September 2018
- Meetings
- Final ESIA Report to EAD

AECOM

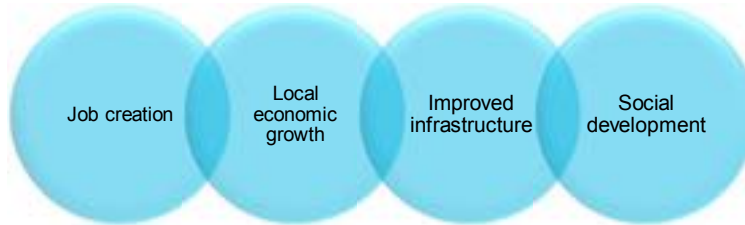


Environmental and Social Impact Assessment (ESIA)

Potential impacts of the Malingunde Project

The Malingunde Project is likely to have a range of impacts on the environment and the people living in the area.

Potential positive impacts



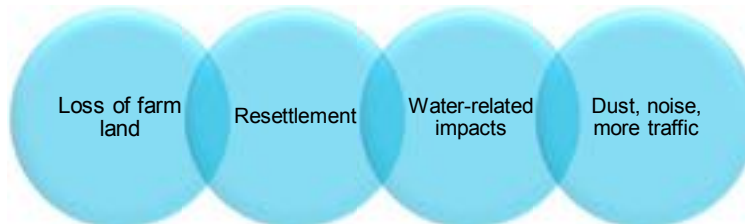
AECOM

Environmental and Social Impact Assessment (ESIA)

Potential impacts of the Malingunde Project

The Malingunde Project is likely to have a range of impacts on the environment and the people living in the area.

Potential negative impacts





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Environmental and Social Impact Assessment (ESIA)

How can you participate and get involved?

- Register as a stakeholder
- Communicate your questions and concerns in writing to AECOM, C12 and Sovereign
- Comment on information received (Draft Scoping Report and Draft ESIA Report)
- Attend public meetings held during the project (March and September 2018)





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Environmental and Social Impact Assessment (ESIA)

Who can you contact?

Your comments are important!

Please share with us your concerns, questions and issues

AECOM
 Anelle Lötter
 Email: Anelle@jaws.co.za
 PO Box 30523, CC3, Lilongwe, Malawi

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

Website: <http://sovereignmetals.com.au/building-malingunde/>

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Malingunde Graphite Project

Environmental and Social Impact Assessment

Stakeholder Meetings – Environmental Scoping Phase

7 – 9 March 2018

Lilongwe, Malawi

Introductions: Project Team

– **Sovereign Metals**

(Developer)

- Julian Stephens
- Andries Kruger
- Reidwel Nyirenda

– **Dhamana Consulting**

(Principal Environmental Consultant)

- Nanette Hattingh

– **Aecom**

(Stakeholder engagement)

- Anelle Lotter

– **C12**

(Social studies and stakeholder engagement)

- Chaitali Mukherjee
- Arthur Kambombe
- David Mussa

Purpose of the Meeting and Discussion Points

1. **Share information** about the proposed Malingunde Project and the environmental and social impact assessment (ESIA) process, focusing on the contents of the **draft** environmental scoping report (ESR).
2. **Discuss** the potential impacts and issues identified that require further assessment during the ESIA phase.
3. **Review** the terms of references (ToRs) for a variety of specialist studies to be undertaken.
4. **Receive inputs** to determine the extent of, and approach to, the ESIA phase.
5. **Obtain comments** and inputs from stakeholders.

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Studies by Sovereign Metals Limited

- Sovereign is conducting technical studies, which will culminate in a **feasibility study, to determine the viability** of developing the natural flake graphite deposit at Malingunde. Studies undertaken to date indicate that deposit at Malingunde can potentially yield ~ 44 000 tonnes of graphite concentrate per annum over an initial life-of-mine (LOM) of 17 years.
- Sovereign has completed an economic scoping study and is currently undertaking a pre-feasibility study.
- Sovereign has also commenced an ESIA process as required in terms of the Environment Management Act (EMA), (Act No 19 of 2017).
- The ESIA is conducted in phases (an environmental scoping and ESIA phase) and is currently in the environmental scoping phase. The ESR is the main deliverable of this phase.
- If the Project is proven to be viable, Sovereign aims to bring the Project into construction in 2019.

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Who is McCourt Mining and Sovereign Metals?



- Sovereign Metals Limited is an Australian publicly listed company primarily focussed on exploring for and developing natural flake graphite deposits in central Malawi.
- McCourt Mining is a wholly owned subsidiary of Sovereign and the holder of the Exclusive Prospecting Licence (EPL) in which the Project is located.
- McCourt is the applicant for the environmental authorisation for the Project.

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The Role of Dhamana Consulting, AECOM and C12

- Dhamana Consulting, AECOM and C12 (local Malawian consultancy) are consulting firms with international experience in undertaking environmental and social studies and have been commissioned by Sovereign Metals to undertake the ESIA process for the project.
- Dhamana Consulting, AECOM and C12 have no private interest in the proposed Malingunde Project and operate independently to reflect both the interests and concerns of stakeholders and the mine.

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Development Activities Needed Before Mining Commences		
Study / Item	Completed?	Timeframe
Economic Scoping Study		Mid-2017
Pre-feasibility Study		Mid-2018
ESIA (incl. Environmental Scoping Study)		4 th Quarter 2018
Resettlement Action Plan		4 th Quarter 2018
Definitive Feasibility Study		1 st Quarter 2019
Mining License		Mid-2019
Product Marketing Agreements		Mid-2019
Decision to Mine		Mid-2019
Project Execution Starts		3 rd - 4 th Quarter 2019

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- ### Key Environmental Scoping Phase Milestones
1. **June 2017:** Project Brief submitted and the Environmental Affairs Department (EAD) indicated that an ESIA will be required
 2. **December 2017:** The ESIA study was announced
 - Stakeholder meetings were held (4 – 7 Dec 2017)
 - Background Information documents were distributed
 - Comments and inputs received from stakeholders were recorded in the Comments and Responses Report (CRR)
 3. **March 2018:** The draft ESR is available for review from 5 March – 13 April 2018
 - Non-technical summary of the ESR distributed
 - Stakeholder meetings (7 – 9 March 2018)
 - Comments and inputs will be considered and recorded in the CRR
 4. **May 2018:** Submission of the Final ESR to EAD
- AECOM**

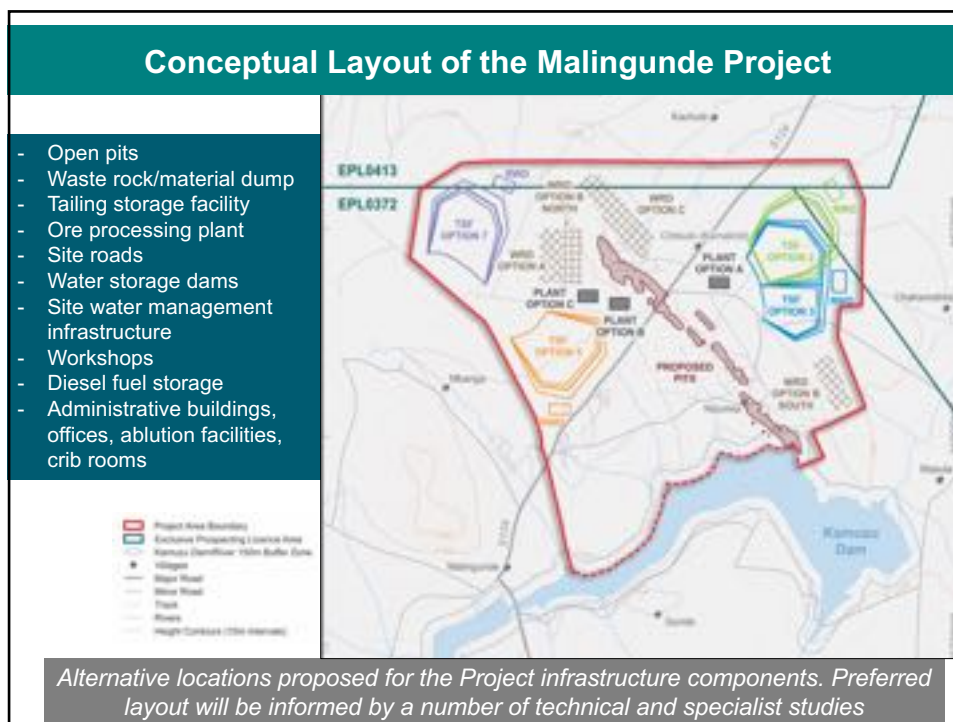
Location of the Malingunde Project

- Malingunde Project is located 15 km southwest of Lilongwe Boma, and falls within the Lilongwe District of the Central Administrative Region
- Project area will be ~ 300 – 400 hectares in size
- Access to the Project is 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
- Located in close proximity to the villages of Kumalindi (Chitsulo) and Ndumila
- Directly north of Kamuzu Dam II

Project Activities

- Open pit mining with traditional excavator and haul trucks will be used to mine the ore.
- No drilling and blasting will be required.
- Pits will be a maximum of 25 m deep and 200 m wide.
- Excavated ore will be transported to the run-of-mine (ROM) pad and processing plant for treatment (scrubbing and flotation).
- Waste rock (material) will either be transported to the tailings storage facility or to the waste rock (material) dump.
- The produced concentrate will be transported on truck for 26 km to Kanengo train station (north of Lilongwe Boma) from where it will be railed to Nacala port in Mozambique for export.

Section 2 of the ESR for more information



Legislative Context

- Section 2(f) of the Environment Management Act (EMA), No. 19 of 2017 states that an ESIA is a legal requirement for any project that may significantly affect the environment and use of natural resources.
- 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.
- In addition, the following will be considered:
 - Other relevant Malawian legislation, policies and standards.
 - In the absence of specific guidelines and standards under Malawi legislation, good international industry practice (GIIP)
 - International guidelines and standards e.g. International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012), the World Bank Group Environmental, Health and Safety Guidelines (2007) and the Equator Principles (Equator Principles Association, 2013).

Section 3 of the ESR for more information

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Environmental Scoping Report (ESR)

Objectives of the scoping phase:

- ✓ Provide opportunity for all stakeholders to exchange information with the Project team and express their views and concerns regarding the Project.
- ✓ Identify key issues and concerns that require further assessment during the ESIA phase.
- ✓ Identify potential environmental and social issues that require detailed investigation and assessment by specialists in the ESIA phase.
- ✓ Develop the ToR for specialist studies.
- ✓ Determine the extent of, and approach to, the ESIA.

Purpose of the ESR:

- ✓ Provides a description of the proposed Project (Section 2).
- ✓ Details information on the existing biophysical and social environment (Section 4).
- ✓ Identifies potential environmental and social issues that require detailed assessment in the ESIA phase (Section 6).
- ✓ Defines the ToR for the required specialist studies (Section 7).

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Potential Impacts and Issues for Consideration (Section 6)

Soil:

- Exposure and disturbance of soil.
- Increased soil erosion.
- Lack of topsoil for rehabilitation.



Plants and Animals:

- Loss of vegetation through clearing.
- Displacement of fauna.
- Loss of feeding and breeding sites.
- Habitat degradation due to dust.
- Impact through accidental contact with harmful substances.
- Disturbance of fauna through noise and vibration.
- Disruption of fauna migration patterns.
- Invasion of alien vegetation.

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Potential Impacts and Issues for Consideration (Section 6)

Wetlands:

- Loss of wetland habitat.
- Sedimentation of dambos.
- Impact on aquatic biodiversity.



Surface and Groundwater:

- Decrease in surface water run-off.
- Deterioration of water quality.
- Groundwater inflow into open pits.
- Impact on aquifers through pit dewatering.
- Deterioration of groundwater quality.
- Creation of acid mine drainage (AMD), although unlikely to occur.

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Potential Impacts and Issues for Consideration (Section 6)

Air Quality:

- Increase in dust.
- Increase in gaseous emissions.
- Increase in greenhouse gases.

Visual:

- Change in visual character and sense of place.

Noise and Vibration:

- Increase in noise and vibration

Cultural Heritage Resources:

- Disturbance of archaeological and cultural heritage sites.
- Disturbance of graves.

Traffic:

- Increase in vehicle traffic – impact on noise, road safety, illumination, road conditions.



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Potential Impacts and Issues for Consideration (Section 6)

Social:

- Land acquisition and resettlement.
- Creation of employment opportunities.
- Population influx:
 - lead to informal settlements
 - increased demand for local community services
 - poor sanitation practices
 - pressure on land and water resources
 - impact on community well-being
 - increased risks related to transmission of communicable disease
- Improvement in social infrastructure.
- Contribution to the economy.
- Successful rehabilitation and closure disturbed areas.



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Specialist Studies in the ESIA Phase (Section 7)

The following studies will be undertaken as part of the ESIA phase and will focus on the Project area and the access route:

- | | |
|--------------------------------------|------------------------------------|
| • Terrestrial flora and fauna. | • Visual impact assessment. |
| • Aquatic ecology. | • Social impact assessment. |
| • Soils and land capability. | • Resettlement action plan. |
| • Surface water. | • Heritage and archaeology. |
| • Groundwater. | • Health impact assessment. |
| • Geochemistry (acid mine drainage). | • Rehabilitation and closure plan. |
| • Air quality and greenhouse gas. | |
| • Noise and vibration. | |

For more details and ToRs on the various studies refer to Section 7 of the ESR.

Specialist studies will be conducted based on the ToRs described in the ESR

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

Stakeholder Engagement (Section 5)

- Comments and Responses Report details issues raised to date – Appendix H of ESR.
- Stakeholder engagement will continue throughout the ESIA phase.
- Comments, issues and queries raised will inform the various studies and be incorporated in the Comments and Responses report.
- Grievance mechanism – Appendix G of ESR – will be implemented during the ESIA phase.
- Meetings to be held again on completion of the ESIA Report (4th Quarter 2018).

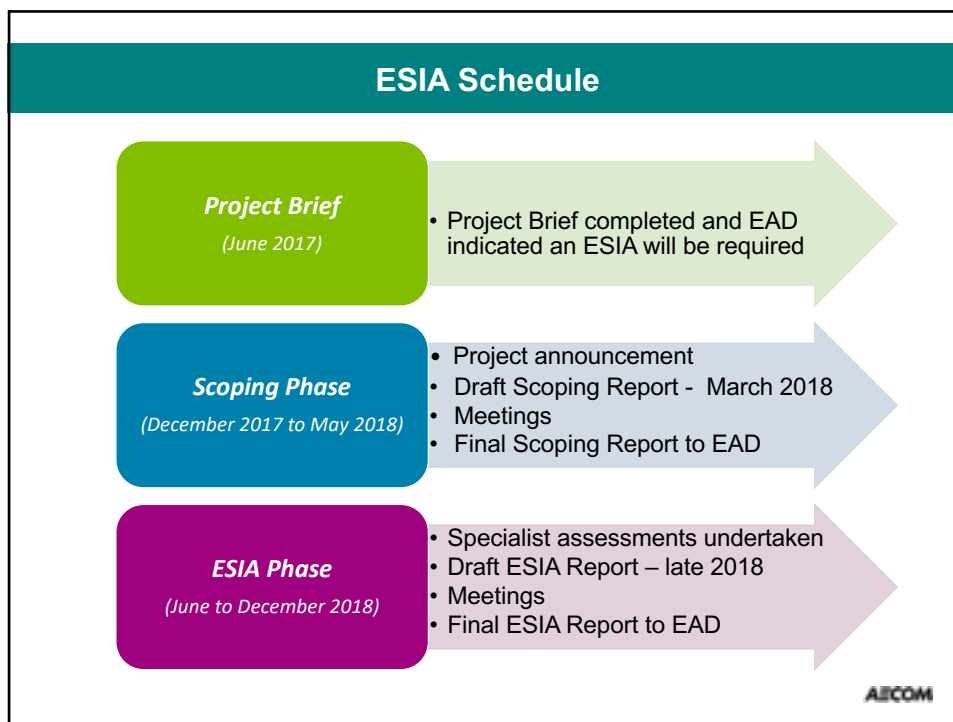
As part of the social impact assessment and data collection for the resettlement action plan, consultation will be undertaken at household level. This consultation will commence in late April 2018.

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Objectives of the ESIA

- ✓ Define the existing social, cultural, economic and environmental conditions within the Project area.
- ✓ Review feasible Project alternatives.
- ✓ Identify and assess potential environmental and social impacts associated with the Project.
- ✓ Identify practical and feasible mitigation measures 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.
- ✓ Develop a conceptual rehabilitation and closure strategy for the Project.
- ✓ Develop a resettlement action plan.

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ESR available for review from 5 March to 13 April 2018

Your comments are important!
Please share with us your concerns, questions and issues

AECOM
Anelle Lötter
Email: Anelle@jaws.co.za
PO Box 30523, CC3, Lilongwe, Malawi

C12
Grace Mpinganjira
Email: admin@ctwelve.org
Tel: +265 998 521 663/+265 881 409 466

Website: <http://sovereignmetals.com.au/building-malingunde/>

ESR available at:

- Offices of C12 Consultants – Office Number 7, Skyband Complex, off Paul Kagame Rd, Lilongwe.
- Offices of the Environmental Affairs Department.
- Lilongwe District Council Offices.
- Masumbankhunda Traditional Authority.

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APPENDIX H

ATTENDANCE REGISTERS OF ENVIRONMENTAL SCOPING MEETINGS (MARCH 2018)

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Wednesday, 7 March 2018 at 10:00




Cross Roads Hotel

AECOM





Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Nanette Hattigh	Dhamana Consulting	+61405429422	nanette.hattigh@ dhamana.com.au	
Dries Kruger	Sovereign	+265-998957962	@kruger@ sovereignmatters.com.au	
Afred Toppele	Antiquiter	0888350315	Toppele@antiquiter-phi .com	
Moses Mlampha	Antiquiter	0999111029 0888	MOSES MLAMPHA @yahoo.com	
Nicholas Kamanga	CMA Cam	0884 828 550	HR.NKAMANGA @cma-cgm.com	

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
BISWICK MLAVIDA	LILONGWE DISTRICT COUNCIL	0995666134	bismlavisa@gmail.com	
REIDWEL NYIRENDA	SOVEREIGN	0999681405	Reidwel.Nyirenda @sovereign.com.mw	
Denis Kamwendo	L USB	6782314804	deniskamwendo@ gmail.com	Den
AULAN KAZIPUTA	ROADS AUTHORITY	0888639444	akaziputa@ ra.og.mw	
Mering Betty Dube	Ministry of Lands Housing & Urban Development	0999958145	mbdube@gmail.com	Mdube

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Arthur Kambombe	C12	0991715442	akambombe@gmail.com	
Oswald K. Nwamsamali	National Water Resources Authority	0999110437	onsamali@yahoo.com	
Cynthia Chilima	Ministry of Lands	0999493175	c.chilima@yahoo.com	
Nisile Mwaisunga	Environmental Affairs Department	0999416636	nisile2002@yahoo.com	

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Wednesday, 7 March 2018 at 14:00






Lilongwe District Council Offices

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Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
ARCHITUR KAMBANG	RIZ	0991715242	akambang@ smi1.com	
SUH PINGINI TUKULA MAHSA	PINGINI	0991842179	-	 1 MAR-14-14
GVH TSLA	CH'TSLA	-	-	
SGKH TANGGI	TANGGI	0995750366	-	
GVH NYUNDO	GVH NYUNDO	099494160	-	






Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
JERALD BELEMON.	TANGAI	0884421515 0999570362	-	
SEWA MSUNGGA	MSUNGGA	0999137580	-	
LUIKA MUSANDIRA	CHIEF CLERK	0888366100 0999746355	-	
Lembetsai Sobowai	ASC.	0996329843	-	
VEREBINA CHAPATA	VDC Ndumila	0991705481	-	

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Tione Hambani	CHESHO V.D.C	0997444567	-	T. Hambani
Miemi Kapisuhai	V.D.C	0996601725	-	U. R
Hardwell Kachule	Ganga I VDC	0999695112 0886437390		H. Kachule
Cathren Kabango	A.D.C U.I.CE Chair	0993583124		C. Kabango
Nyogani Budaya	Sug. Nyogani			Nyogani


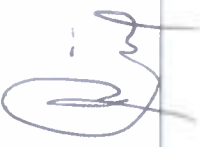

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Kalinde Bulaiti Yug Kalinde		0880306045	-	
V. H Katawa	MTUMU	0880306045	-	
V. H Kumalindiwa ⁿⁱ	mtumu	0884044330	-	
V. H Kumalindiwa ⁿⁱ	mtumu	0880306045	-	
V. H Kumalindiwa ⁿⁱ	mtumu	0884044330	-	






Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
V.H Kokofani	0995716437	←		Kokofani
V.H Kubale				Kubale
V. Mbonkeka	0881256487			Mbonkeka
V.H Sawulani	0881256487	0881256487		Sawulani
V.H ndumila 2	ndumila 2	0880306045		ndumila 2





Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
V.H. DUBILA.2		0993699525		L.C.
Richard Banks	member FRIENDS OF MALINDANG (ED)	099300090	richbanks@yahoo.com	
JONES MAULI		099955155	jonesmauli@yahoo.com	
Martin (handwritten)	MANUNGUNDE (Rep)	0888725735	martinthondu@yahoo.com	
Elube Mphambawire	v.d.c chair	0880264935 0996352332		E. M


Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
DUMISANI CHIWALA	LILONGWE DISTRICT COUNCIL - Planning	0999291226/ 0888491226	dumisani-chiwala @gmail.com	
BISWICK MLAVIWA	LILONGWE DC Environment	0995666134	bismilaviwa@gmail.com	
John Kwiringo	Lilongwe District Council	0993034232	John Kwiringo 1963 @gmail.com	
NEVERNESS KAMCHACHA	VICE CHAIR PERSON LEDC	0992242697	—	
MARVEL TIBU	DND LILONGWE DISTRICT COUNCIL - Water	0999 270 206	mrakanga@ yehus.com	

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Sarah Sandapo	LLPC Admin	099948266 0999 321209	Arya Muzita @ rocketmail.com	
Rahence Simu	LLPC Planning	0999458266	Rahence Simu @gmail.com	
Tamara Bakili	LLPC Planning	0995285694	Tamara Bakili @gmail .com	
Dries Kaye	Samryn			
S. STEPHENS	n			

Wednesday, 7 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
T. NICOLLE	SOVEREIGN	0999445021	trevor.j.nicolle@sovereign.com.mu	

ATTENDANCE REGISTER





Malingunde Graphite Project, Lilongwe District, Malawi

Thursday, 8 March 2018 at 10:00

Lilongwe District Council Offices

AECOM






Thursday, 8 March 2018


NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
C. Chatsenda	T/A Malili ✓	0995415795		
Zina umalera	G.V.H Chola ✓	0997157198		Z. m.
S. Donald	G.V. Malili ✓	0999035267		
Sib matura	V. Headman ✓	0999276239		
NTVOU Eiya	G.V.H Karwoche ✓	0993662605		

Thursday, 8 March 2018


NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
MSEA KACHEPA	G.H. Chimbaso			MS
Selkasi Jesoni	V. H. Mthace			
B. CHAKUMBA	V D C			
T. A CHIMUTU	T.A.			
Martin Thondolo	VDC / Politic			

Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
BISMACK MLAVIWA	LL DISTRICT COUNCIL	0995666134	bismilaviwa@gmail.com	
Dries Kungu	Sovereign			
Bodie Chifalasi	MAHARAJA VDC/MALILI	0989488233		
DAVID MUSSA	CID CONSULTANT	0888618631 0995422244	missfamily@yahoo.com	
ARTHUR KAMBOMBE	E12	0991715442	alombosob@gmail.com	

JONES MALILI FRIENDS OF MALINDIPE³ 099995515 JONESMILILI@YAHOO.COM 

Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
REIDWEL MIRENDA	SDFEFGH			

ATTENDANCE REGISTER






Malingunde Graphite Project, Lilongwe District, Malawi

Thursday, 8 March 2018 at 14:00






Cross Roads Hotel

AECOM




Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Cynthia Simkanda	Centre for Environmenta Policy and Advocacy	0999055276	Cynthia@Cepa- org.org	
HAROLD HOPKINSON	Norwegian Church Aid	0999946312	hh@nca.no	
Theresei Mapembe	Nomvora "	0882088587	Theresei.Mapembe @nce.no Emapembe@ yahoo.com	
Eddy Kaluse	MCAE	0994661691	EddyKaluse@hotmai .co.uk	
Rafiqi Hayati	IPI (NIRSA (ANRA))	0999968800	feequnoo@gmail.in	






Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Jones Fichali	Focus	0994307044	nuswesichali@gmail.com	
Douglas MOKATI	LLDC	0999135976	moffaticougle@gmail.com	
BISWICK MUAJUA	LLDC	0995666134	bismlavisa@gmail.com	
ALUJUR GAMBORRE	E12	0991715442	alshamborrese@gmail.com	
DAVID NUSSA	C12	0888618631 09957422244	dmussa@citwelwa.org	






Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Simekina Kaluzi	Controm A	0991609 007 / 0888 608 571	skaluzi@yahoo.com	
Talumba Bileya	CONOMA	0995741885	talumba.mhoro@gmail.com	Tgo.
Dina Longue	Chamber of Mines & Energy Malawi	0999917109	longuedina@hotmail.com	
Dean Lungu	^	0999952275	lungudean@gmail.com	
KARL CHOKOTHO	MCCCI MALAWI CONFEDERATION OF CHAMBERS OF COMMERCE & INDUSTRY	0888961961	llw.k.chokotho@ccma-ghm.com	

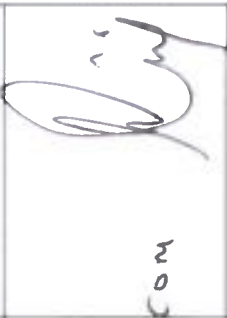
Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Daniel Towner	ICCF	+1-703-598-0318	dtowner@internationalconservation.org	
Alex Major Hon.	NATIONAL ASSEMBLY. MP CC	0999952722	tsogolaniestate agent@gmail .com	
Keith Matanda	MALAWI EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE Malawi Extractive Industries Transparency Initiative	0885593 218	kmatanda@ gmail.com	
Abdul Chiraho		09958 77773	chiraho2007@gmail.com	
Radia Chiyalasi	Friends of Mabingside	0999458733		

Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Martin Thondiso	Nkhoma Synod Public Health Department	0888728738	martynthondiso@yahoo.com	
Baton chikumbi	Friends of Malawi T/A Kallie	0992340 744		
Dies Kruger	Sovereign			
Reidwel Nyirenda	Sovereign			
Angus Nkhoswe	Oxfam	0999274411	ENkhoswe@oxfam.org.uk	

Thursday, 8 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
JONES MARILI	FRIENDS OF MARIAMBA	0999955155	jonesmarili@yahoo.com	

ATTENDANCE REGISTER


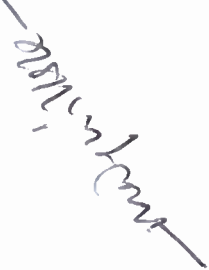



Malingunde Graphite Project, Lilongwe District, Malawi

Friday, 9 March 2018 at 14:00






Cross Roads Hotel

AECOM

Friday, 9 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
ARTHUR KAMBUMBE A	CIZ	099 1715412	akumbo@ gmail.com	
MADLITSO MATIEN	Equal Times www.equaltimes.org CITUC	0855 463500 0995 368288	madlitso@ gmail.com	
DEBORAH MANDA	MINING & TRADE REVIEW	0995681514	ndalorocw@ gmail.com	
LOVEMORE KHOMO	MALAWI NEWS HUB www.malawinewshub.com	0995743494	khemolovemore@ gmail.com	
JOSEPH DZUWA	REGIONAL INFORMATION OFFICER CENTRE	0995243988	josephdz@ gmail.com	

Friday, 9 March 2018

NAME AND SURNAME	ORGANISATION	TEL / CELL	EMAIL ADDRESS	SIGNATURE
Jones Marili	FRIENDS OF MARI MARI	0999955155	j2smarie@yahoo.com	
Maxwell Mphoyo Maring Chikoi	/ / Maring Chikoi	0999937597 088 1504159	mphoyomaxwell@ gmail.com marinchikoi200 @gmail.com	 
Thrusty Kachobu	Freelancer	099964782	abuzmaximox @gmail.com	
Lloyd M'kweni	Maravi Post	0999612496	lloydmkweni@ gmail.com	

APPENDIX I

NEWSPAPER ADVERTISEMENTS

MALINGUNDE GRAPHITE PROJECT

Daily Times

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 5 March to 13 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 7 to 13 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 **13 April 2018**.

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.

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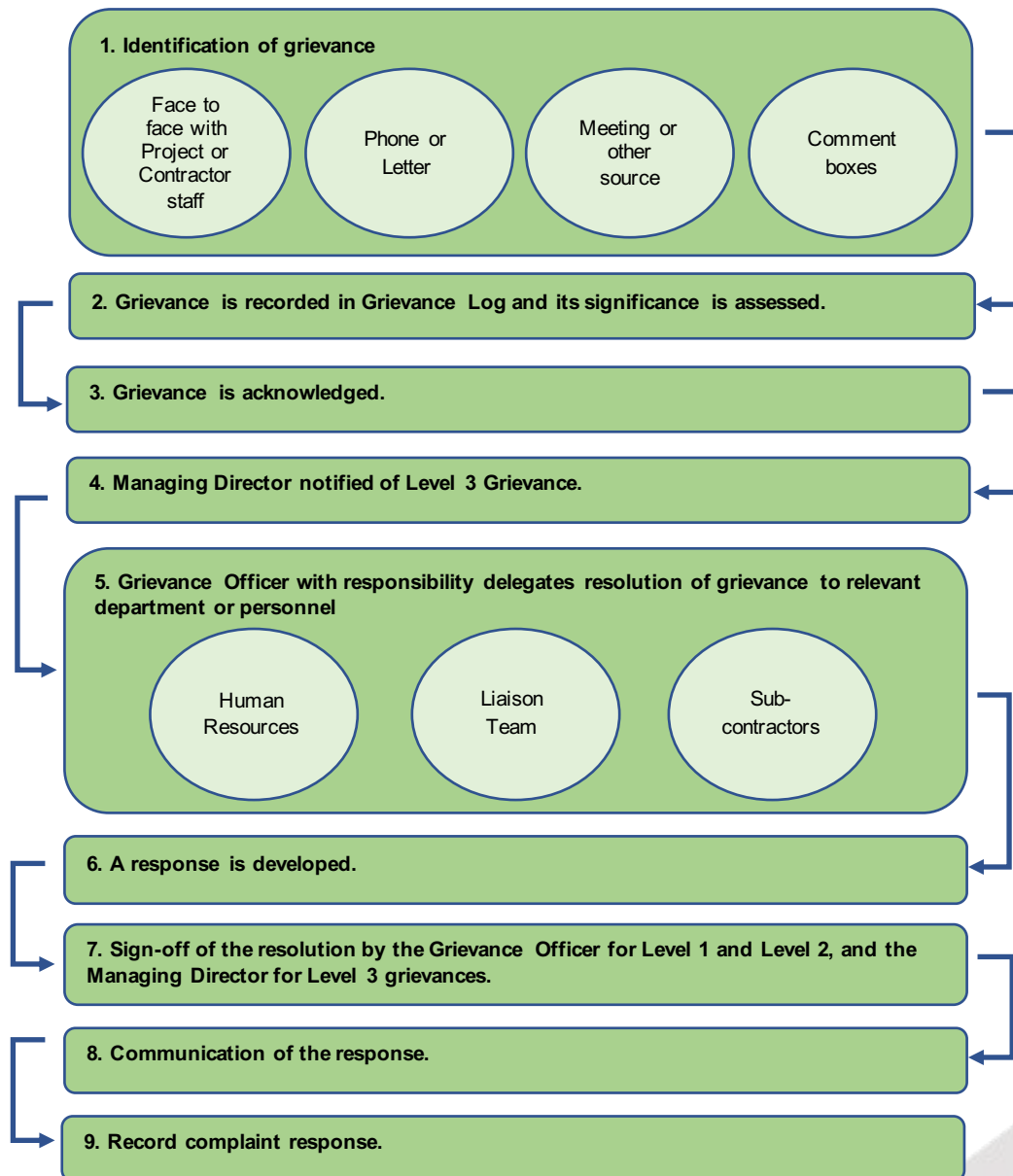
APPENDIX J

GRIEVANCE MECHANISM

Malingunde Project Grievance Mechanism

There are 10 steps that complete the formal grievance process. This process is also summarised in Figure J1, and each step is described below.

Figure J1: 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 K

COMMENTS AND RESPONSE REPORT



Proposed Malingunde Graphite Project

Environmental and Social Impact
Assessment (ESIA)

Comments and Responses Report (CRR)

Sovereign Metals Limited

Project Number: 60559368

Version 2 of 4

May 2018

FINAL

Quality information

Prepared by

Anelle Lotter
Stakeholder Engagement
Practitioner

Checked by

Karien Lotter
Project Manager

Approved by

Johan Hayes
Africa Practice Lead:
Environmental Management &
Permitting

Prepared for:

Sovereign Metals Limited
Level 9, BGC Centre,
28 The Esplanade
PERTH WA 6000
T: +61 8 9322 6322
info@sovereignmetals.com.au

Prepared by:

AECOM SA (Pty) Ltd
263A West Avenue
Centurion
Tshwane
0157
SOUTH AFRICA

T: +27(0) 12 421 3500
F: +27 (0)12 421 3501
aecom.com

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Abbreviations

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

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Preamble

This comments and responses report (CRR) (Version 2) 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. It also include comments raised by stakeholders during the review of the draft environmental scoping report (DESR).

- Version 1 of the CRR was appended to the DESR and has included comments from stakeholders raised from 4 December 2017 to 28 February 2018.
- Version 2 of the CRR is appended to the final environmental scoping report (FESR) and includes comments that were raised on the DESR 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.

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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	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
ESIA 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.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
<p>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 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.</p>	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.
<p>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.</p>	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.
<p>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.</p>	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.
<p>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.</p>	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.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
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.
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

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
						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 Crossroads Hotel	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.
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.

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
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.
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.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
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 required.	Mr	Lawford Palani	District Commissioner	05/12/2017 at 10:00	Meeting with the District Commissioner's office	Noted with thanks.
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

FINAL

Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
						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 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.

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Issue / Concern	Contributor			Date of Contribution	Means of Contribution	Response
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.
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.

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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.
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.

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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 by Sovereign whether discharge, compatible with drinking water standards will be accepted.
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.

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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.
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.

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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 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 for stakeholder review.

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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 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.

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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 for them to know what to expect was suggested.	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 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	Mr	Matthews Malata	Association for Environmental Journalists	06/12/2017	Meeting with NGOs and civil society at	Noted. A SEP will be developed and details of proposed communication

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at all levels, through various mechanisms and to all stakeholders.					the Cross Roads Hotel at 14:00	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 Authority and the DC at the DC offices at 10:00	If required, households will be compensated according to the 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

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						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.
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.

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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 displaced 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.

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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.
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.

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						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.
The following are specific concerns associated with the project: <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.
Consider community mobilisation awareness and empowerment a priority.	Mr	Thokozani Mapemba	Norwegian Church Aid (NCA)	06/12/2017	Registration and Comment Form	Noted.
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	Mr	Billy Mayaya	Human rights activist working with communities	15/12/2017	Email	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

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<p>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>						<p>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 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>

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						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 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>	Mr	Jones Malili	Friends of Malingunde: Executive Director/Vice Chairman	15/12/2017	Email	The response above was also submitted to Mr Malili on 20/12/2017.
Is the BID considered public and if so, will it be available on Sovereign Metals or AECOM's website?	Ms	Rachelle Etter-Phoya	Tax Justice Network	15/12/2017	Email	The BID is public information and may be distributed to all interested parties. Visit the website http://sovereignmetals.com.au/building-

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						malingunde/ for accessing copies of the BID.
What are the boundaries of the project? Which villages will be affected within the tenement area of the project?	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>
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

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						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 process.	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.
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

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						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. 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 EAD will be required in terms of the Environment Management Act (EMA),

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						(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	<p>Yes, an 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 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</p>

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						<p>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>
<p>You have already taken some samples from the area and you have planted some *metal* 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>	Mr	Suzgo Chitete	Nation Publications Limited	11/01/2018	Email	<p>Samples have been taken in the area since 2016. The samples were collected 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</p>

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						<p>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	<p>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 DC's office and a representative of the Department of Mines was also present. During the 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</p>

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						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 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	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.

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						<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 RAP, which is done in consultation with each potentially affected individual and household. This RAP will have to be approved by the Ministry of Lands, Housing and Urban Development before anyone can be resettled.</p>
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	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

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					<p>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>
<p>The need for open and ongoing information including disclosure of the background and experience of SVM cannot be overemphasised.</p> <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>	Mr	Billy Mayaya	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 Australian publicly listed company that trades on the 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</p>

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						<p>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 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</p>

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						<p>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> <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)

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						<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 Malingunde. In addition to the feasibility study, Sovereign has commenced an 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</p>

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					<p>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. 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.

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						<ul style="list-style-type: none"> • 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 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</p>

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						<p>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 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</p>

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						<p>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 IFC Performance Standards on Environmental and Social Sustainability (2012) and the Equator Principles (2013). 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.</p>
Clear communication about the responsibilities of the company vis-à-vis the government (Central, District, Dept of Mines, EAD, Lands, etc.) should be	Ms	Rachel Etter-Phoya	Researcher	10/02/2018	Registration and Comment Form	Noted.

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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).						
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	Researcher	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 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)).	Ms	Rachel Etter-Phoya	Researcher	10/02/2018	Registration and Comment Form	<p>The methodology for the SIA will include the following primary data collection activities in the Project Area of Influence (Aoi):</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 Aoi.

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						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.
Will at least some of the project alternatives be outside the Kamuzu Dam watershed? (Especially the TSF)	Ms	Rachel Etter-Phoya	Researcher	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	Researcher	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.
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	Researcher	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	Researcher	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.

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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	Researcher	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	Researcher	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 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			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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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>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>		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	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.
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?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	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 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.

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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.
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.

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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 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		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	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>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. 					
<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.</p> <p>In a bid to promote human rights standards 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>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 comply with good international industry practice (GIIP) will be adhered to, and where relevant, international guidelines and standards applied, including IFC Performance Standards on Environmental and Social Sustainability (2012). Performance Standard 1 requires free, prior and informed participation of affected communities.</p>
<p>Will the consideration of FPIC be included in the identification of community needs prior to implementation of the Corporate Social</p>		<p>Natural Resources Justice Network (NRJN) and the</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</p>

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Responsibilities (CSR's) to ensure transparency and public trust? Include implementation timescales and scope of written agreements to facilitate monitoring and accountability.		Publish What You Pay Malawi			conducted, which will form the basis of determining corporate social responsibility initiatives.
Will there be any specific provisions in the agreement that will directly benefit the local community at large? If so, what would those be?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	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.
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?		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	A mechanism for distribution of allowances has not been developed yet. This mechanism will be considered as part of the feasibility studies.
<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 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>		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	A draft grievance mechanism is being developed and will be presented to 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.

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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.		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	The Lilongwe City Assembly Environmental Office will be approached and invited to become involved in the ESIA process.
Involve local development committees or CSOs in monitoring company's CSR initiatives to track progress.		Natural Resources Justice Network (NRJN) and the Publish What You Pay Malawi	13/02/2018	Registration and Comment Form	Monitoring mechanisms will be developed as part of the CSR programme.

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2. Comments Received on the Draft Environmental Scoping Report

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The S124 road cuts right across the study area. Is an alternative road or a road deviation considered as part of the ESIA?	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Various options are currently being considered for the road which include amongst other a) temporary rerouting of the road and mining this section before reinstating the road, b) permanent rerouting or deviation of the existing road, c) not mining the section where the road traverses. An assessment of the options will undertaken as part of the feasibility studies. Sovereign is aware that there is a proposal by the Malawi Roads Authority to upgrade the S124.
The southern boundry of the study area is right on the Kamuzu Dam. It is suggested that a buffer zone between the study area and the dam is considered. In addition management of stormwater is required to prevent any polluted water to drain into the dam.	Ms	Mercy Betty Dube	Ministry of Lands Housing and Urban Development	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Sovereign Metals is aware of the requirements for a buffer zone and the management of stormwater to prevent any potential pollution. A meeting was held between Sovereign Metals and the Lilongwe Water Board in December 2017 where officials raised their concerns and issues.
Whichever alternative is selected with regards to the road, it should be considered that people should not be cut-off and should have full access in movement.	Mr	Allan Kaziputa	Malawi Roads Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Sovereign Metals is currently liaising with the Malawi Roads Authority to understand their requirements as well as the proposed upgrade to the road planned by the Malawi government. The impact on movement and access of people will be considered in the feasibility studies.
Documents presented by Sovereign Metals indicate the proposed life of mine to be 17 years – are any longer timeframes or future mining planned?	Ms	Mercy Betty Dube	Ministry of Lands Housing and Urban Development	07/03/2018	Meeting with government officials and parastatals at	Sovereign Metals currently plans for a life of mine of 17 years in the study area, however, further exploration activities are undertaken in other areas where the

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					Cross Roads Hotel at 10:00	company holds the EPLs. If proven feasible, additional resources may have the potential to extend the life of mine.
Should it be considered to upgrade the S124 road, or to deviate the road, specialist assessments with regards to cultural heritage should also be conducted to include such areas and proposals.	Mr	Moses Mkumpha	Department of Antiquities	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.
Will the assessment for cultural heritage also include the areas where the TSFs and WRDs are proposed?	Mr	Alfred Topella	Department of Antiquities	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Specialists will assess the entire study area as per the map in the DESR which includes the areas proposed for the options for the TSFs and WRDs.
Investigations / studies are underway to consider the upgrade of the S124 road and Sovereign Metals should keep contact with the Malawi Roads Authority to stay abreast of progress made.	Mr	Allan Kaziputa	Malawi Roads Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.
Is a closed water system proposed? Will water produced by the mine be released back into the environment? It should be noted that Sovereign Metals will most likely have to apply for a waste water discharge licence after the water has been treated. How will run-off be managed? What is Sovereign Metals' strategy with regards to surface and groundwater management?	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	<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 impacts on surface and groundwater sources; and identify management measures and strategies to minimise the risk of contamination.</p> <p>A detailed water balance will also be developed to understand whether the project will produce excess water that will need to be discharged. Stormwater management measures and bunding of areas will be undertaken to ensure that</p>

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						<p>clean and dirty water is separated and managed.</p> <p>Should it be required, Sovereign Metals will apply for further licences and approvals as mentioned.</p>
It is suggested that groundwater quantity and quality be monitored before the Project commences in order to have good baseline data available.	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Sovereign is currently undertaking surface and groundwater quality monitoring on a quarterly basis. In addition, groundwater levels are being monitored to obtain representative baseline data.
Which chemicals are proposed to be used in the processing of the graphite? Pollution of the water sources will not be tolerated.	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	<p>Chemicals proposed to be used in the process are limited to a small amount of diesel and alcohol-based frother.</p> <p>The Malawian drinking water standards as well as other international standards for potable and drinking water will be considered in the ESIA.</p>
It should be noted that the standards for Malawian drinking water is high and Sovereign Metals is urged to follow these standards. The entire Lilongwe River upstream is a water protected area by law since 1993. A specific declaration in this regard is available which also provides information with regards to buffer zones required. Sovereign Metals was invited to contact the Natural Water Resources Authority for a copy of the information. The title is "Water Resources Act" (Cap. 72:03) "Water Resources (Controlled Water Areas) Order, 1993. This was issued under Government Notice No. 91 in the Malawi	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.

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Gazette Supplement dated 27th October, 1993.						
What is the approach to manage public anxiety in terms of the potential impacts that this Project may have, especially in terms of potential water impacts?	Mr	Allan Kaziputa	Malawi Roads Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	The ESIA study in itself is a step-wise process which enables all stakeholders to receive information as it becomes available, review the information and comment on the information. The ESIA report will detail the potential impacts on water, as well as the proposed management measures. The results from the ESIA will be clearly communicated to stakeholders so that they can understand the implications.
Should material have to be borrowed (e.g. aggregate, soil), the area where it is borrowed should also be assessed for potential cultural heritage features.	Mr	Alfred Topella	Department of Antiquities	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.
When will people have to be resettled?	Ms	Cynthia Chilima	Ministry of Lands	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	People will not be resettled before Sovereign Metals have received an approved Mining Licence. The ESIA has to be completed first before Sovereign Metals can apply for a Mining License. In terms of a timeline, people will not be resettled before mid 2019.
Flooding of rivers is becoming a more common phenomina and it could potentially be due to climate change impacts. Please note when assessments are conducted that climate change impacts are also considered.	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.
Can the project be designed to have a beneficial / positive impact on the environment?	Mr	Biswick Mlaviwa	Lilongwe District Council - EDO	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Positive impacts and potential benefits to the community will be investigated and assessed as part of the ESIA. Sovereign Metals is currently, for example, investigating possible green

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						technologies (e.g. solar power) to be included the Project.
What exact type of graphite is Sovereign Metals looking to mine?	Mr	Denis Kamwendo	Lilongwe Water Board	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	The Project proposed to mine flake graphite of different sizes.
Will there be anything useful in what is regarded as the waste after Sovereign Metals has taken out the graphite?	Mr	Denis Kamwendo	Lilongwe Water Board	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Graphite ore in the project area consists of approximately 10% graphite, 30 – 40% clay, 50% quartz and 10% mica. Sovereign will only take out the graphite and it does not consider the waste material to be of any value.
When Sovereign Metals engage with households in the study area, the potential impacts have to be explained in laymen's terms for the people to understand	Mr	Nisile Mwaisunga	Environmental Affairs Department (EAD)	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted. Household meetings, interviews and surveys are conducted with assistance from Malawian fieldworkers who can explain concepts in the context of stakeholders' understanding and in the language of their choice.
We would like to be convinced based on the information that will be provided in the ESIA report that the designs proposed for the infrastructure, e.g. TSFs will be able to withstand all circumstances and incidences.	Mr	Oswald K Nwamsamali	National Water Resources Authority	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	Noted.
Has a solution for rehabilitation been found? It is strongly suggested that continuous rehabilitation is implemented.	Mr	Biswick Mlaviwa	Lilongwe District Council - EDO	07/03/2018	Meeting with government officials and parastatals at Cross Roads Hotel at 10:00	A solution has not yet been found. Several alternatives are being investigated and these will be reported on in the ESIA Report. The suggestion is noted.
What type of roads does Sovereign Metals need for transportation – how wide should the roads be for your needs? We cannot design a road without your commitment for continuation of the mining project – information from Sovereign Metals is required.	Mr	Jones Malili and others	FOMA	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	It is anticipated that approximately 6 – 8 return truck trips will be undertaken daily with ~30 tonne trucks. In addition approximately 4 return bus trips will be undertaken daily to transport staff to and from the mine site. The feasibility study

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						will consider the road infrastructure and access road requirements.
Is Sovereign Metals considering a graphite beneficiation plant in Malawi?	Mr	Jones Malili	FOMA	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	No – Sovereign Metals only intends to mine graphite and produce a graphite concentrate in the processing plant on site. It requires a different skill set for a company to convert the concentrate to final product and Sovereign Metals do not plan on acquiring such capabilities.
Is Sovereign Metals upgrading the road?	Mr	Richard Banda	FOMA	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	No. From meetings with the Roads Department, Sovereign Metals' current understanding is that the Malawi government has already started a process to undertake the upgrade of the S124 road. Further meetings between the parties will still take place.
From September to December is a good time for harvesting and that should be kept in mind should relocation of people be considered.	Ms	Elube Mphambawire	VDC Chair	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	Noted. In the event that relocation has to take place in that time, people will also be compensated for their harvests.
There is anxiety in the communities and people need more information. A meeting is taking place with the community in the study area, but why are you not meeting with all the other Traditional Authorities and people in the EPL?	Mr	John Kawinga	Lilongwe District Council	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	A meeting is scheduled to take place on 8 March 2018 with TA Malili to share information about the project as communities in his area may be impacted by the upgrade of the road. Other communities in the EPL will not be impacted on, thus information about the Project is not relevant to them.
The Chiefs in the northeast of the study area is not in attendance at this meeting and it is a concern.	Mr	Biswick Mlaviwa	Lilongwe District Council - EDO	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	The Chiefs will be invited to attend the meeting to be held with the community on 9 March 2018.

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<p>As the TA of the area where the Project is proposed, I would like to say that I represent my people and I want my people to have a say in the resettlement process and also to say where they would like to be resettled to. Will it be possible for me and representatives of the TA to visit a project where resettlement has taken place to see what can be expected and to hear what the lessons are to be learnt? Please let the resettlement be done in truth and with justice – the truth sets people free. We will return to the community and explain that Sovereign Metals has not yet taken a decision to carry on with the project and that a decision still has to be taken on whether the mine will continue or not. We would like to request that the farming calendar is taken into consideration.</p>	Mr	C Chatsenda	T/A Malili	07/03/2018	Meeting with the Lilongwe District Council and the TA structures for the Malingunde (TA Masumbankhunda)	Noted.
<p>Potential water pollution is a serious concern as well as the availability of water in future for farming crops and household use. What is proposed to be done with the process water?</p>	Mr	Biswick Mlaviwa	Lilongwe District Council - EDO	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	<p>A groundwater and surface water assessment will be undertaken to determine the potential impact on water sources. This which will include modelling of groundwater flow. Such a model together with monitoring data will be used to determine potential pollution plumes.</p> <p>A soils assessment will also be conducted to identify the potential impacts on land use capability, particularly after closure.</p> <p>As far as possible process water will be recycled and reused in the processing plant. Water from the processing plant will be deposited with tailings on the TSF</p>

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						from where part of it will be returned to the plant for use.
Standing water is unsafe for people and it promotes the breeding of mosquitoes and therefore malaria – what is proposed for the rehabilitation of the mine?	Mr	Biswick Mlaviwa	Lilongwe District Council - EDO	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	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.
How can water be recycled for 17 years (the Life of Mine)? What will be done with the polluted water afterwards?	Mr	S Donald	G. v. Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	<p>It is estimated that the Project will require approximately 450 ML of water per year.</p> <p>As far as possible process water will be recycled and reused in the processing plant. Water from the processing plant will be deposited with tailings on the TSF from where part of it will be returned to the plant for use.</p> <p>Polluted water will be collected in pollution control dams, where necessary. This water can also be reused in the process.</p> <p>Water losses from the process will occur due to evaporation (from TSF and dams) as well as through interstitial water storage within the tailings material in the TSF. Due to these losses from the process, raw water will be required as make-up water.</p>
Who will compensate the people who will be displaced?	Mr	C Chatsenda	T/A Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	A RAP and associated compensation plan will be compiled according to the requirements of Malawian legislation and international best practice, which includes consultation with all

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						resettlement-affected households and the relevant authorities. Compensation will be paid by Sovereign Metals in accordance with the requirements of the Malawi government.
Concern about the graveyards in the study area. Will we receive a notice from Sovereign Metals not to further expand our existing graveyards?	Mr	S Donald	G. v. Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	A heritage specialist will identify all features of archaeological, heritage and cultural importance in the project area, including graveyards. Management and mitigation plans will be developed based on the specialist assessment. A buffer area will be placed around graveyards to avoid impact on graves.
We are concerned about the dust.			Member of the VDC	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	Monitoring equipment is already in place 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. Permission was obtained from the community to place the dust monitoring devices where these are currently located.
How will we benefit by the Project?		T.A. Chimutu	T/A Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	Benefits of the Project have not yet been determined. Positive impacts and potential benefits to the community will be investigated and assessed as part of the ESIA.
The TA Malili and its associated structures would like to be part of the process and would like to be invited to all meetings in		T.A. Chimutu	T/A Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA	Noted, the TA Malili will be invited to future meetings. All the TAs in the EPL

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future. The TAs in the EPL should all be involved and should all benefit equally.					structures along the S124 road (TA Malili)	will not be impacted equally by the proposed development.
Transparency is required with the process to upgrade the road. There are some issues which will have to be discussed, e.g. there is a school close to the road and the safety of the children is first priority and maybe the school has to be relocated.	Mr	C Chatsenda	T/A Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili)	Noted. A separate study is undertaken for the potential upgrade of the road by the Malawi government. Safety of children and pedestrians will also be considered in the ESIA for the graphite project.
Job opportunities should be provided to the local people of the area.	Mr	C Chatsenda	T/A Malili	08/03/2018	Meeting with the Lilongwe District Council and the TA structures along the S124 road (TA Malili) at 10:00	Noted. Job opportunities may arise from the Project, however the expected number of opportunities and the type of jobs will only be known once the feasibility studies have been completed.
In our experience it is all about the people on the ground – their experience of the Project will be vital to the success of the project.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
The principle of Free Prior Informed Consent (FPIC) will have to be followed throughout the process, this includes for the rights of indigenous people, human rights, transparent communication of communities and their right to agree to the project or not.	Mr	Rafiq Hajat and Thokozani Mapemba	IPI, NRJN, IANRA and NCA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted. The aim of FPIC, is to establish bottom up participation and consultation of an indigenous population prior to the beginning of a development on ancestral land or using resources within the indigenous population's territory. Consultation with households and stakeholders representing households will be undertaken throughout the ESIA process to ensure that all stakeholders receive communication and can freely participate in the ESIA process.
Projects of this nature fails in its implementation. The ESIA documents may be good, but the implementation of the project is key to its success. Examples of failed project implementation were noted.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.

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Sovereign Metals' exit strategy and the rehabilitation of the mining operations is crucially important. The area will have to be rehabilitated to its pristine pre-mining state. We have seen abandonment, abscondment and pollution by mining companies and the country is left with an unaccepted state of the environment for which no one is taking responsibility.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
What safeguards will be in place for environmental disasters not to happen should the mine stop mining or should the mining operation be completed?	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Safeguards, management measures and strategies will be considered as part of the environmental and social management plan (ESMP) and mine closure plan.
Graphite is not life – water is life. What safety precautions will be in place to ensure that the Project will not have an impact on the water resources?	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	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 impacts on surface and groundwater sources; and identify management measures and strategies to minimise the risk of contamination. A detailed water balance will also be developed to understand whether the project will produce excess water that will need to be discharged. Stormwater management measures and bunding of areas will be undertaken to ensure that clean and dirty water is separated and managed.
Open cast mining is similar to digging a grave – it creates a huge eye sore. What rehabilitation measures are proposed?	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	A rehabilitation and closure plan, including proposed end land uses will be compiled as part of the ESIA report. The

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						plan will also consider progressive rehabilitation to be undertaken throughout the life of the mine.
The new Mining Act will include for a proposed mine to allocate funds for the rehabilitation of a mine at the commencement of the mining process. We would like to see Sovereign make a financial allocation towards the full rehabilitation of the mining site at the commencement of the Project.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Comment noted. Sovereign will await the new Mining Act to determine what the requirements in this regard are from the Malawi government.
Do not be surprised if a hostile environment is found in which consultation has to take place. Many promises were made in the past by mining companies who have not delivered on their promises. Malawi's history with mining projects does not inspire its people to be excited about mining projects.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
Concerned with the potential of Acid Mine Drainage (AMD) and the potential effect on our water resources.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	A geochemistry study, as well as surface and groundwater assessments will be undertaken to determine the potential impact on water resources as part of the ESIA.
Concerned about the integrity of the design of the TSF – can an alternative TSF be constructed in case the facility planned fails?	Ms	Talumba Boleya	Congoma	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Only one TSF will be designed. The facility will have sufficient capacity and will be designed to hold more than the capacity it would received in terms of tailings. The design will be approved and the facility inspected on a regular basis to comply with international standards.
Concerned about the potential pollution of the Kamuzu Dam and water quantity in the area.	Mr	Tokozani Mapemba	NCA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	The ESIA team met with the Lilongwe Water Board to discuss potential impacts on the Kamuzu Dam. Potential impacts on the dam and on the groundwater and surface water in the

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						Project area will be identified and assessed and measures will be proposed to minimise the impact.
Communities have to understand the potential impact that this Project may have, especially on their cultural heritage and graveyards.		Simekinala Kaluzi	Congoma	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted. Stakeholders are being consulted throughout the ESIA process to participate in each phase of the process, including the identification of impacts. A detailed archaeological and cultural heritage assessment will be undertaken as part of the ESIA.
Is Sovereign Metals considering the impact of its operations on roads and areas of off-loading?	Mr	Dean Lunga	Chamber of Mines and Energy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	The Malawi government is undertaking investigations for the upgrade of the S124 road. The ESIA for the Malingunde Project will consider potential impacts on safety, dust and risks associated with the extra vehicles that may use the road for the transportation of ore.
The protection of Kamuzu Dam is most important and it also include the catchment of the Dam and the forest located in the catchment.	Ms	Cynthia Simkonda	Centre for Environmental Policy and Advocacy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
Concerned with the potential of erosion associated with mining and the impacts of siltation of the water resources.	Ms	Cynthia Simkonda	Centre for Environmental Policy and Advocacy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
How does Sovereign Metals plan to adhere to the Environmental Management Plan which will be compiled for the Project? The Malawi government does not have the resources to monitor the implementation of the plan and this should be considered in the EMP implementation.	Ms	Cynthia Simkonda	Centre for Environmental Policy and Advocacy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	The company will appoint an internal team that will be responsible for the implementation of the EMP and management of environmental impacts. The implementation will also be audited on a regular basis in line with good practice and Malawi government requirements.

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How will Sovereign engage people on ground level?	Ms	Cynthia Simkonda	Centre for Environmental Policy and Advocacy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Household surveys will be conducted in April/May 2018 as part of the development of the RAP and SIA. Furthermore, meetings are regularly held with communities and their representatives as part of the ESIA process.
How can water be recycled for 17 years? Which chemicals will be used in processing?	Mr	Tokozani Mapemba	NCA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	<p>It is estimated that the Project will require approximately 450 ML of water per year.</p> <p>As far as process water will be recycled and reused in the processing plant. Water from the processing plant will be deposited with tailings on the TSF from where part of it will be returned to the plant for use.</p> <p>Water losses from the process will occur due to evaporation (from TSF and dams) as well as through interstitial water storage within the tailings material in the TSF. Due to these losses from the process, raw water will be required as make-up water</p> <p>Chemicals proposed to be used in the process are limited to a small amount of diesel and alcohol-based frother.</p>
The technical aspects of this project (e.g. pollution management, mitigation with regards to cultural heritage, etc.) can be overcome with good engineering and mitigation measures, however this project's greatest issues will be social challenges. Make sure to consider social issues and challenges in a very serious light.	Mr	Dean Lunga	Chamber of Mines and Energy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted. A social impact assessment will be conducted to understand and consider social issues pertaining to the Project.

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When will mining commence?	Hon	Alex Major	National Assembly MPCC	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Mining will only commence once all approvals and licences are in place, and it is not foreseen to be before late-2019.
Who is the major market for the graphite?	Hon	Alex Major	National Assembly MPCC	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	China.
Does Sovereign already have an agreement with the Malawi government to mine?	Hon	Alex Major	National Assembly MPCC	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	No, not yet.
We would like to review the agreement between the Malawi government and Sovereign Metals for this Project.	Hon	Alex Major	National Assembly MPCC	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
The new Mining Act will clarify many issues in terms of the agreement between the government and mining houses, including the community development agreement which is required.	Mr	Dean Lunga	Chamber of Mines and Energy	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
Who is conducting the ESIA – are they independent?	Hon	Alex Major	National Assembly MPCC	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	The ESIA is conducted by an independent, well qualified group of consultants with international experience.
Who will accompany Sovereign Metals to the meeting planned with the community on 9 March 2018?		Next to Havard		08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Lilongwe District Council, TA and all at the meeting was invited to attend.
Did Sovereign Metals have consent from the community for exploration in the area?	Mr	Douglas Maffat	Lilongwe District Council	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Yes, Sovereign Metals has an approved licence to undertake exploration. Sovereign has good relations with communities and work through the office of the Lilongwe District Council and the Department of Mines.
From the ground, a different story is told. It is understood that the communities is under the impression that mining has started as “truck loads of ore” is already taken from the mining site.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Mining has not started yet. Work to date has been focused on exploration activities to understand the size and grade of the potential deposit. Sovereign Metals is aware of the impression and the process of

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						exploration and the process of sampling have been communicated at several occasions to communities and their representatives.
Want to caution Sovereign Metals to invest heavily in communicating to people on the ground – communication has to improve.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted.
If resettlement has to take place, the principle should be that communities are moved to an amenable location to their current way of life.	Mr	Rafiq Hajat	IPI, NRJN, IANRA	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted. Should relocation be required, it will be done according to international best practice of which the comment made is one such principle.
The people of Malawi is disillusioned with their past experiences with mining. There has not yet been sufficient communication and consultation with the communities of Malingunde.	Mr	Eddy Kalonga	MCAG	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Noted. Household surveys and meetings are to take place in April/May 2018 which will also serve as a means of communication and further meetings are planned as part of the ESIA process.
Which Mining Act is Sovereign Metals complying to?	Mr	Keith Matanda	Malawi Extractive Industries Transparency Initiative	08/03/2018	Meeting with NGOs / CSOs at Cross Roads Hotel	Sovereign Metals complies to the current Mining Act as the new act has not yet been passed.
If we have to be resettled, do we receive another house?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	A RAP will be conducted which will determine the needs of communities and if they should be relocated what the best option will be. In principle, if a person owned a house and has to be relocated, the person has to own a house again.
When you say you don't know yet as to whether this graphite will be mined or not it's like you are putting an opaque curtain between the local community and the authority. Just tell us whether you will mine or not. If you will mine where exactly. We are in a dilemma as to whether we should be constructing permanent structures such				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	There is no secrecy – the EISA process is an open and transparent process and all stakeholders can participate. Sovereign Metals has to undertake a number of studies. The results of these studies will show whether it is financially viable or not for the company to commence with mining. The studies are

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as houses but, in the end, only to be told to move out. There seems to be a lot of secrecy.						underway and the results will be communicated to the communities as we receive them, with decisions being made by mid-2019t
We are worried about resettlement, we do not want someone to dictate to us as to where we should be relocated to as if we were slaves, we will need to choose places of our own choice.				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Noted. Relocation will not take place without the participation of all who may be resettled. The resettlement process will be open and transparent.
Whats the expected lifespan of the mine, should you start mining graphite				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	The life-of-mine is currently estimated at 17 years.
Why do you keep on telling us that you do not know yet as to whether you will open a mine here or not. Do you have experience from elsewhere about how these projects operate, we feel SVM is big company and well experienced in this field hence to keep saying you don't know yet, its just more of keeping the community in the dark, you are hiding the truth.				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Only after the ESIA process is conducted and the results of the feasibility studies are known will Sovereign Metals be able to take a decision as the whether it is viable to open the mine or not. This has been communicated from the start. The process is open and transparent – nothing is being hidden.
Can you please explain the boundaries of your project where more assessments will be conducted so that people know whether they will be involved not. Also, for us to plan where to choose to go should we be relocated.				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	The project area where specialist studies will be conducted was shown to those in attendance on a map and explained by referring to landmarks known to the community.
Having reached this stage, will SVM still be continuing with drilling?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	The process of prospecting for the Project is continuing. Sovereign Metals has the EPL rights in other areas and it may do further drilling there.

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You have already spent a lot of cash on exploration activities, what will you do if the community does not support mining? How will you recover your lost money?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	The money spent will be lost. If mining does not go ahead the money spent will not be recovered.
If after all the assessments and exploration activities you find that mining is not viable who will be responsible for the loss of money - the Malawi government, the community or Sovereign Metals?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Sovereign Metals and their shareholders will then have to take the loss.
What benefits will the mine have to the community? If people around the mining site will be relocated, how will they be considered for work since they will be far away from the area.				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Benefits of the Project have not yet been determined. Positive impacts and potential benefits to the community will be investigated and assessed as part of the ESIA.
We are happy to hear that you found good graphite deposits here, that is what everyone wanted to know rather to be told that more assessments need to be conducted besides exploration.				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Noted, however, people need to understand that more work is required before mining can commence, than just knowing there is a good resource. The studies are being conducted to ensure that the impacts of mining will not leave a negative legacy for the community who will stay in this area.
From the map it shows not everyone around the proposed mining site might be relocated, but from the mine there will be dust plus other impacts, how will you ensure that those people remaining will not be affected negatively?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	The specialist assessments are conducted to determine the potential impacts that the Project may have as well as the measures to implement to mitigate such impacts. Monitoring of dust is already taking place to ensure that the baseline is understood and determine the significance of changes if mining should commence.
We were very grateful when you provided the communities with borehole water, but the same community will be relocated hence the provision of boreholes is just a				09/03/2018	Meeting with the Malingunde community at the old	The principle of relocation which Sovereign Metals will adhere to is that communities will be in the same or in a better position if they have to be

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mockery. Will you make sure that wherever these people will be relocated to that there is potable water plus other social facilities for their good livelihood?					Driller's Camp at 09:00	relocated. Infrastructure such as boreholes will be replaced if they are impacted by the Project.
There is Kayelekera Uranium Mine in Karonga. Are you aware of what happened there?				09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Sovereign Metals is aware.
As Friends of Malingunde (FOMA) we had similar worries as the communities, however, after wider consultations and being involved in various stakeholders meetings we now understand what is going on and we would like to assure the community that so far Sovereign Metals is simply following the right procedures as outlined in Malawian and international laws. We have met with authorities in various government departments and ministries just to make sure we are not left behind.	Mr	Jones Malili	FOMA	09/03/2018	Meeting with the Malingunde community at the old Driller's Camp at 09:00	Noted.
How many kilometres from the Kamuzu Dam will the mining operation be?	Mr	Madalitso Kateta	Equal times (ITUC)	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	The exact location of the mining operation is yet to be determined. Sovereign Mine will adhere to the required regulations which specify a buffer zone around water resources.
Can the media be taken for a tour of the study area?		Several media members who attended the meeting		09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Sovereign Metals can arrange for the media to undertake a visit to the study area, however, it was noted that there is nothing else to see but the communities staying in the area.
How many jobs will be created?	Ms	Deborah Manda	Mining and Trade Review	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	During construction about 200 – 250 and during operations 100 – 150, however the exact number of jobs and the type of jobs will be determined as

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						part of the specialist assessment to be conducted.
Is there another area where Sovereign Metals is active with the same kind of operations?	Ms	Lovemore Khomo	Malawi News Hub	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	No, not at this stage.
Why has Sovereign chosen this specific area for its Project?	Ms	Lovemore Khomo	Malawi News Hub	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	The area was chosen due to the good graphite deposit which was found through exploration.
How far from the mine should communities be not to be impacted by the dust of the mining operations?	Mr	Lloyd Mstubana	Maravi Post	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Currently no specific distances are set. The air quality study will model the dust fallout and a buffer zone around mining operations will be recommended and adhered to. Dust outfall will be monitored to ensure that it has no negative impact on communities.
How much are you investing in a corporate social development programme?	Ms	Martha Chikozi	Malawi 24	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Sovereign Metals still have to make a decision on such an investment. A recommendation will be made at the end of the ESIA process.
Can the history of this project be visually documented for generations to come to learn from?	Mr	Maxwell Mphoyo	Malawi 24	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Noted.
Concerned about the integrity of the bridges which will be crossed in transporting the ore.	Mr	Joseph Dzuwa	Regional Information Officer	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	The upgrade of the S124 road will be supported by further studies which will investigate the integrity of the bridges.
Concerned about security – people should have access to security points in their vicinity.	Mr	Joseph Dzuwa	Regional Information Officer	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Noted.
What is proposed for rehabilitation and closure of the mine?	Mr	Joseph Dzuwa	Regional Information Officer	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	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.

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There have been examples where people have been resettled to areas where they do not have access to basic infrastructure and that is not acceptable.	Mr	Joseph Dzuwa	Regional Information Officer	09/03/2018	Media information meeting at Cross Roads Hotel at 14:00	Noted.
Let me express my worries that such an important document is being strategically withheld instead of allowing stakeholders to properly analyse its contents for proper internalization so that informed comments and reactions follow. Why the secrecy?	Mr	Billy Mayaya	Development Art Consultancy	03/03/2018	Email	The document that you refer to is the Draft Environmental Scoping Report. As per the Malawian legislation and other international requirements (IFC and World Bank) to which Sovereign is adhering, the document has to be made available for a period of 30 days for review by stakeholders. The document is available as from 5 March to 13 April 2018. We would like to meet with stakeholders at the beginning of the review process to assist them in their understanding of the contents of the report from where they can review the report for a period of almost 4 weeks.

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<p>“Major concern 1: Non availability of the document for our meaningful perusal before the meeting in good time. This is a major cause of worry. I was informed that the document will likely be circulated on 6th whilst those from far are travelling on the 7th. How do you expect meaningful inputs. When are they hosting consultative meetings with their staff/advisory boards and other constituents and make a new informed submission on the 8th March. This is a sign of rubber stamping which we can not accept.</p> <p>As NRJN, we cannot accept this helicopter type of consultation. We needed the document even two weeks before. Mind you, we are not only working on this assignment. The secrecy as raised by others have continued pausing some fearsort and suspicions as if you are not even sure of what you have prepared and why are we being invited for. Sending a letter one months earlier but giving a document for their perusal a day before the meeting is a mere joke. We don't want follow up letters seeking confirmations BUT we want to document first.</p> <p>In conclusion, minus the document in our email boxes, just postponed the meeting to do just to the process. We will not be part of a failed process which is man made for reasons not clearly to us as stakeholders. Its a resource wastage. Time for rubber stamping is gone.</p>	Mr	Kossam Munthali	Chairperson - NRJN	05/03/2018	Email	<p>The Draft Environmental Scoping Report was made available from 5 March to 13 April 2018. Meetings were held with various stakeholders and representatives from 7 to 9 March 2018 to provide to them an introduction to and a summary of the content of the the report. Stakeholders had the opportunity to comment at meetings, in writing or to request additional opportunities during the entire 30 day review period.</p> <p>Another period of review will be available when the draft ESIA document has been produced later this year.</p>

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Thank you for your astute comments. I, for one, find SVM's attitude to this process extremely condescending and provocative. We demand extra time to scrutinize the contents of the so called scoping study TOGETHER with the communities and stakeholders concerned. Not only in Malingunde but the broader civil society. Once bitten thrice shy.	Mr	Billy Mayaya	Development Art Consultancy	05/03/2018	Email	Noted.
There is need for a more detailed description of the geology of the site. There are concerns that there are potential pyrite sources in the area. There is need for clarity on whether these are absent from the mining area.	Mr	C.N. Bandazi	Mines Department	06/03/2018	Email	Additional information regarding the geology has been included in the final environmental scoping report that was submitted to the EAD.
What is the name of the frother or what exactly are the chemicals that will comprise the reagents used in flotation?	Mr	C.N. Bandazi	Mines Department	06/03/2018	Email	Chemicals proposed to be used in the process are limited to a small amount of diesel and Glycol F-549 frother, an alcohol-based frother.
<p>While your project is at an early stage, and I appreciate you already have excellent relationships with government, please do keep us in mind if we can ever be helpful down the line.</p> <p>We can design custom programming and events bringing together Members of the National Assembly of Malawi, through our Caucus, the Malawi Parliamentary Conservation Caucus (MPCC), as well as other government officials for you to highlight your social responsibility initiatives, and provide a platform to get Sovereign's message across to a wide swathe of government leaders in a single</p>	Mr	Daniel Tanner	International Conservation Caucus Foundation	08/03/2018	Email	Noted.

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<p>setting on a workshop on best practices in environmentally sustainable mining, etc.</p> <p>For further reference on our organization's initiatives and what we do globally, our recent impact report and newsletter may be viewed at the links below:</p> <p>http://www.internationalconservation.org/publications/IMPACT2017.pdf http://www.internationalconservation.org/publications/quarterly/jan2018.pdf</p> <p>Best of luck with the next phases of your assessments, and feel free to reach out anytime if you feel conversations with our Caucus Co-Chairs, Hon. Major, Hon. Chilenga, or others might be helpful to Sovereign with respect to the Mining Act revisions, or once you're in negotiations on agreements beyond your exploratory license.</p>						
<p>The 'Guidelines of Environmental Impact Assessment for Malawi' referred to were developed in 1997 (p.19). Are these the most current and comprehensive? There are also 'Guidelines for Environmental Impact Assessment' from April 2011, produced by the Government of Malawi's Environmental Affairs Department.</p>	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Confirmation was received from the Environmental Affairs Department that the Guidelines for Environmental Impact Assessment for Malawi, 1997 are the most current guidelines and should be used in the ESIA process.
<p>One of the proposed pits (south-east) overlaps with the 150 metre dam/river buffer zone (indicated on Figure 2.1, page 11). What measures will be put in place to ensure the integrity of the water source remains intact? What specific methods and</p>	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	The final outline of the pits have not be confirmed. Sovereign will ensure that the final mine design takes into account constraints such as the dam buffer zone so that the impact to the dam will be minimised.

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tests will be run and how frequently by the company to monitor the water source?						The EMP that will be developed as part of the ESIA process will specify the frequency and extent of the monitoring requirements based on the results of the specialists baseline water studies.
As Sovereign Metals continues to carry out exploration work within the licence area, and as prices and costs change, the size and location of proposed pits may change, which also has implications for the location and size of infrastructure, such as the TSF. How will these (yet unknown) potential changes to pit location be taken into account in the ESIA and ESMP?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Sovereign at the end of the feasibility studies will select a mine design and pit outline, as well as the TSF location and size that is sufficiently robust to compensate for changes in price and costs. This will form the basis for the project and the ESIA. If significant changes do occur during the operation that warrant changes then discussions will be held with EAD and Department of Mines to determine the appropriate way forward.
The TSF will be designed to hold 7.3 Mt of tailings over the life of the mine (p. 14). As Sovereign continues to explore and as prices, costs and technology change, the life of the mine may be extended which would require an expansion of the planned TSF or a new TSF. How will the ESIA take this into account? Or in the case of expansion or a new TSF, would a new ESIA be required?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Future potential expansions of the Project may require either an amendment of the ESIA or a new ESIA process to be undertaken. Expansions or significant changes in infrastructure and operations will be discussed with the EAD and Department of Mines to determine the appropriate procedures and processes to be followed to ensure the necessary environmental approvals are in place.
What does 'generally' mean in 'the concentration of chemicals [...] and in fact generally meet the World Health Organisation Guidelines for drinking water (2011)' (p. 12)?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Aluminium levels in the sample tested were the only element that exceeded the drinking water standards. Further samples will be tested to confirm this value.
'[T]here are no anticipated added chemicals that would end up in the TSF or within any other parts of the site' (p. v); however, are	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Studies to date have not indicated any elements of concern in the waste rock or soil that would be disturbed through

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there any naturally or otherwise (from current and previous human activity at the site) occurring elements in the waste rock, soil, or in the environment that might be disturbed through the mining project? How will this be assessed in the ESIA process?						activities on site. However, this will be confirmed through the detailed soils study and further geochemical assessments that will be undertaken as part of the ESIA and feasibility study.
What criteria will be used to determine the relevancy of applying international guidelines and standards as referred to: 'In the absence of specific guidelines and standards under Malawian legislation, and where relevant, international guidelines and standards will be applied' (p.26).	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	As the project is committed to adhere to IFC Performance Standards, these standards and the World Bank Group Environmental, Health and Safety Guidelines will be used in the first instance where Malawian guidelines do not exist. Other guidelines such as the the World Health Organisation Guidelines for drinking-water quality and Indoor air quality guidelines will also be consulted. The cirteria used will differ among the various specialist studies undertaken and will depend on good industry practice.
Will the project comply with the IFC Performance Standards (and Equator Principles) in full even if Sovereign does not secure financing that would require compliance?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	The project is committed to complying with the IFC Performance Standards and the Equator Principles irrespective of financing needs, and the ESIA will be undertaken in compliance with the standards and principles
Typo on p.65, maze should be maize; on p.73, a date needs to be added; on p.95, penultimate reference is missing a few characters.	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Noted.
What research ethics will be applied to ensure informants, particularly at the household level, are protected during the ESIA process and documentation?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	Research ethics form an integral part of approach to and methodology for the social specialists' studies and data collection. The specialists recognise their responsibility to:

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						<ul style="list-style-type: none"> - Respect human dignity, integrity, freedom and right to participate. - Respect privacy, close relationships and confidentiality. - Prevent unnecessary harm and suffering. - Inform research participants. - Obtain free and informed consent. - Report on research findings and restrict re-use of information. - Protect children’s rights. <p>The following measures have been, and will continue to be implemented throughout the specialist studies:</p> <ul style="list-style-type: none"> - Two rounds of stakeholder engagement have taken place (December 2017 and March 2018) to inform stakeholders, including community and household-level stakeholders about the project, its status and upcoming data collection activities - Prior to commencing household-level surveys, an introductory meeting was held in Kumalindi to inform the community about when the surveys will start, the purpose thereof, and to introduce the fieldwork team who will be conducting the data collection. - Prior to the commencement of each individual household-survey, participants were again informed about the Project and the purpose of the survey. It was emphasised that their participation was voluntary, and that if there were questions during the survey they were

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						<p>uncomfortable answering, that they were not obliged to do so.</p> <ul style="list-style-type: none"> - As part of the household survey, each household was assigned a unique number. Reporting for RAP purposes will make reference only to this household number, allowing for personal information (including name and identity number) to remain outside the public domain. Personal information will be held in a database to be used by the Project team only. - Demographic and socio-economic information will be presented at village level only, and will not make reference to particular households - Only adult members of households (18 years or older) were interviewed as part of the survey and focus group discussions - Information obtained during focus group discussions will be reported on in general terms (for example, as views reported by women, the youth or a particular organisation) and reference will not be made to individual respondents - Data collection is limited to topics directly relevant to the specialist studies. The social specialists are trained to recognise topics informants are not comfortable discussing, and will not insist on exploring such topics.
On p.10 of Appendix H, the final block reads 'Noted. The question was posed whether discharge, compatible with drinking water standards will be accepted'. What	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	No definitive response by the Lilongwe Water Board was given. Further consultation in this regard will be

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was the answer given by the Lilongwe Water Board in response to this follow-up question?						undertaken to determine what standards would be acceptable.
Where there is no name given under contributor in Appendix H, is this because the name of the contributor was not recorded (e.g p.20)?	Ms	Rachel Etter-Phoya	Researcher	09/03/2018	Email	In some instances the name of the person asking a question or making a comment was not provided or it could not be heard. As far as possible, names of people are recorded. In some instances comments are made on behalf of an organisation – e.g. p.43, 44, 45.
<p>The Malawi Department of Museums and Monuments (Monuments Division) the former Department of Antiquities appreciated your invitation to the stakeholders meeting on Malingunde Graphite Project which centred on Draft ESR at at Crossroads hotel. The Department was impressed on your planned work as regards to archaeology and other cultural heritage resources in the projected area. However the Department would like your team to include the following as part and parcel of the cultural heritage impact assessment:</p> <ul style="list-style-type: none"> • Borrow pit areas where gravel and stone aggregates for the construction of infrastructure will be taken; • Cultural heritage impact assessment on dumping site if the dumping site will be located outside the projected area; • To include Fort (Linga in Chichewa) as monuments in your Cultural heritage impact assessment. Forts are enclosures that were built by ancient settlers of the land to enhance their security from invaders, slave trade 	Mr	Moses Mkumpha	Principal Conservator Malawi Department of Museums and Monuments	15/03/2018	Email	The comments from the Monuments Division have been communicated to the specialist archaeological and heritage impact team to ensure these areas are assessed as part of the study.

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raiders and other. The projected area is known to have such type of cultural heritage resources.						
When Lilongwe Water Board was acquiring and compensating locals for the land around the dam, there were no or a few NGO's or CSOs involved, yet the process went on smoothly. No complaints from the communities. However, it has been observed with Malingunde graphite project there are more NGO's / CSOs showing interest to take part. This has raised concerns and fears amongst the communities that they want to take advantage and benefit more than the affected community itself.			Kubale Village	25/03/2018	Written comments handed to social impact team	Noted.
It has also been observed that, Sovereigns' Stakeholders meetings that were held in Lilongwe were attended by some individuals and chiefs that are not from the impacted area leaving out the directly affected chiefs. As a result, the left-out chiefs fail to relay the vital information regarding the project to their communities.			Kubale Village	25/03/2018	Written comments handed to social impact team	Additional methods of distributing information to villages will be developed during the ESIA phase to ensure communities are informed.
The community understands that there shall be compensation by the company. However, there are speculations that the money will be little as was the case for Kayelekera Mine where people around the mine are said to be suffering because of the same.			Kubale Village	25/03/2018	Written comments handed to social impact team	Noted.
What will happen to the graveyards around the impacted area? Will they be exhumed? If not, will the people around the area, still have access to the graveyards?			Kubale Village	25/03/2018	Written comments handed to social impact team	A survey will be undertaken to determine the location of graves and cemeteries and determine the potential impact. Management measures will be

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						developed to allow communities access to graveyards that remain. These measures will be included in the ESMP.
The Kamuzu Dam II Reservoir is a protected area and Lilongwe Water Board will not allow any activities within the proximity of the reservoir including the buffer zone that will compromise the water quality and, in the process, affect the consumers.			Lilongwe Water Board	27/04/2018	Letter	Noted. The final location of the Project infrastructure will take into consideration the proximity of the reservoir to ensure water quality is not compromised.
The reservoir water is meant solely for water supply and not for any other activities.			Lilongwe Water Board	27/04/2018	Letter	Noted.
Portions of proposed areas for mining are overlapping with the Kamuzu Dam II buffer zone. The buffer zone should not be included into the project area.			Lilongwe Water Board	27/04/2018	Letter	Noted. The final location of the Project infrastructure will take into consideration the proximity of the reservoir and the buffer zone.
One site of the pits has been drilled close to the dam reservoir (south-most one). This is not acceptable in order to avoid negative impacts to the water quality and water yield in the dam reservoir. All the mining activities and processing should not be done close to the reservoir site and any other water body which flows into the Lilongwe River upstream of abstraction point.			Lilongwe Water Board	27/04/2018	Letter	Noted. The final location of the Project infrastructure will take into consideration the proximity of the reservoir to ensure water quality is not compromised.
Contaminated water or runoff water from the project sites should not be flowing into the dam reservoir, and neither into the groundwater, in order to avoid water contamination in the reservoir which in the process can affect consumers including aquatic life. Any wastes emanating from the mine/dug pits and the production plant should not find			Lilongwe Water Board	27/04/2018	Letter	Noted. Management structures will be designed to contain surface water from the project site to ensure contaminated water is not released into the reservoir.

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<p>their way into any water body that flows into the Lilongwe River of abstraction point. Proper barriers should be put in place to prevent any runoff water from the pits to find their way into the water bodies.</p>						
<p>Monitoring facilities should be installed to ensure that the water bodies are free from any contamination emanating from mining activities; this to be checked against baseline conditions.</p>			Lilongwe Water Board	27/04/2018	Letter	A monitoring plan will be developed as part of the ESIA report, which will include monitoring of surface and groundwater in the area throughout the life-of-mine.
<p>Lilongwe Water Board expect that the issues shall be addressed during the studies, project implementation and operation. Otherwise, Lilongwe Water Board as a water service provided instituted by the Government of Malawi, under the Water Works Act of 1995 will not allow the mining activities to proceed in order to protect the finite resource and the consumers.</p>			Lilongwe Water Board	27/04/2018	Letter	Noted.
<p>We have taken note that the surveys will only be conducted during the dry season. LWB recommends carrying out surveys during the rainy season as well so that data for both seasons is collected and analyzed; more so considering baseline conditions. This is important because there is a lot of runoff water during the rainy season and proper assessments could be done on the dug pits to estimate the overflows.</p>			Lilongwe Water Board	27/04/2018	Letter	Surveys and data collection will be undertaken during both the wet and dry season to gather representative baseline data.

Karien Lotter
Senior Social Specialist
T: 012 622 4942
M: +27 84 686 9119
E: Karien.lotter@aecom.com

AECOM SA (Pty) Ltd
263A West Avenue
Centurion
Tshwane
0157
SOUTH AFRICA

T: +27(0) 12 421 3500
F: +27 (0)12 421 3501
aecom.com