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Malesela Thema
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DATE
22 June, 2026

SUBJECT
Complaint Concerning Valterra Mogalakwena Audit

REFERENCE
0710492

Dear Mr. Thema:

Thank you for taking the time to write to the IRMA Secretariat with your concerns regarding the IRMA Stage 2 Audit of the Valterra Mogalakwena mining operations in December 2023. This letter is provided in response to your complaint to IRMA on December 16, 2025. Your concerns were brought to ERM CVS' attention on March 13, 2026. Subsequently, we met internally to review the details of the concerns raised and then met with IRMA to discuss our response provided herein.

In your submission to IRMA, you state that our audit report failed to adequately reflect the realities faced by mining-affected communities, particularly in Ga-Pila, and that it understated the severity of the social and environmental impacts experienced by residents. You also state that the Ga-Pila community was not aware of the audit and were not engaged during the audit process. Based on sampling design and logistics of the assessment, direct engagement with Ga-Pila community representatives did not occur during the site visit that occurred in December 2023, nor during the corrective action plan verification site visit in October 2024. The audit team did, however, meet with affected stakeholders in Mothlotlo, Ga-Puka, Mokopane, Mapela, Mashashane, Rooibok, Ga-Machikiri, and Skimming-Leruleng. Additionally, a remote meeting was held with BenchMarks Foundation and correspondence provided regarding a planned meeting in Sekuruwe that unfortunately did not occur.

Recognizing existing time limitations of the audit process, while at the same time being aware of the approximately 42 surrounding villages affected by mine operations, of which 23 would be considered "doorstep communities", after pre-audit discussions with interested civil society organizations, the audit team selected a representative sampling of communities based on our team's independent stakeholder mapping and analysis of information obtained during the assessment planning and document review process.

The best means of announcing an upcoming IRMA audit has been a learning experience for the IRMA Secretariat and ERM CVS. Experience tells us that potential participants need as much prior notice as possible to organize their communities and their involvement in the process. We also need to be better at identifying and using the range of communications channels and networks used by individuals and groups interested in participating in an IRMA audit. In this case, thirty days prior to the on-site assessment, the audit was announced on the ERM CVS website, IRMA's website, and through IRMA's free email distribution newsletter. The announcement included an invitation to stakeholders to submit written comments about the environmental and social performance of the Mogalakwena Mine to participate in the assessment. Further, ERM CVS prepared a similar announcement in Sepedi that was distributed via email to representatives in the surrounding communities, provided to civil society organizations and posted on the ERM CVS website.

As mentioned, design of the IRMA Stage 2 stakeholder engagement plan is based on the social auditors' independent analysis of the socio-economic and environmental issues and concerns facing impacted communities, as they relate to the range of applicable IRMA chapter requirements. The team takes into account the advice of civil society organizations in selecting potential interviewees. The team also reviews the mine's stakeholder mapping in order to identify their preferred points of community contact, potential gaps, as well as vulnerable groups that should be a focus during assessment engagement activities.

At Mogalakwena, the team was made aware of serious resettlement issues, water, dust and cultural heritage impacts, employment commitments, as well as ongoing difficulties with the mine in terms of communications and grievance management. While participation in an IRMA audit is voluntary we strive to meet with any stakeholder that has expressed interest in the audit process. Nevertheless, the timing and logistics of conducting field assessments will sometimes result in our inability to meet with all those who reached out. In such cases, we attempt to provide alternative arrangements, or work with an intermediary such as a respected NGO in the area, which was the case with this audit. In all cases, the details of our engagement are described in the public summary report.

Given your community has expressed interest in engaging with the auditors, we can confirm that there will be a surveillance audit (as per the IRMA assurance procedure) to be conducted later this year. Surveillance audits are intended to be abbreviated audits conducted midway through the assessment cycle to verify continued conformity of critical requirements, progress on completing corrective actions, and any focus areas identified by the audit firm. In addition, the audit considers feedback from stakeholders received since the previous audit and material changes to operations, personnel, management systems, or the surrounding environment to determine if changes have affected the site's ability to deliver achieved performance scores. Accordingly, we will seek to engage with representatives of your community during the audit process this year.

Concerning the representation of environmental and social impacts on communities in our audit report, we direct you to several details regarding the initial audit:

- In accordance with IRMA guidance on Chapter 2.4 Resettlement, two timeframes were considered within the scope of the audit: resettlement activities that were completed between April 30, 2006 and June 2018; and activities that were completed after 2018. Activities that were completed prior to the 2006 date were not assessed during the audit, although there was still relevance to current actions from the standpoint of human rights due diligence and grievance processes. Our analysis of these timeframes is represented in our audit report as Chapter 2.4a and 2.4b, respectively.
- During our assessment, there were gaps identified in the monitoring of activities related to the Old Motlohotlo and Skimming-Leruleng resettlement action plans, which prompted corrective action and a follow-up site visit and direct community engagement.

- Appendix B of the audit report outlines where findings from the initial audit prompted corrective actions be taken by the site and re-assessment by CVS. These actions focused on some of the areas of concern in your complaint, including:
  - effective engagement with communities with appropriate language and cultural awareness;
  - completion of a human rights due diligence study with a particular focus on past resettlement activities;
  - changes to how grievances by stakeholders are managed;
  - community involvement in emergency response management;
  - completion of a community health impact assessment;
  - additional risk assessment of mine waste facilities;
  - development and implementation of an adaptive water management plan; and
  - implementation of the air quality management plan.

In closing, we assure you that your concerns align with our understanding of the scope and impact of the Mogalakwena mining operations. Our auditors, who are experienced and knowledgeable of the subject matter being assessed, completed the audit in accordance with the IRMA assurance process. We assessed the mining operation against the applicable requirements of the IRMA Standard in consideration of the evidence presented, including that provided by affected stakeholders. We acknowledge the nature of auditing requires that evidence be sampled and assessed within the logistical constraints of the audit process, and consequently, not all communities can be visited. The IRMA process focuses on continual improvement and over time, with subsequent audits and engagement with key stakeholders such as yourself, we strive to not only see improvement of the mine's impacts on the environment and communities, but also in the assurance process. Your outreach is a key part of this process, and we look forward to engaging with you further during subsequent audits and hope that you will participate in the upcoming surveillance audit. Please stay in touch.

Yours sincerely,

Glenn Keays

Operations Director, Mining Certification

ERM CVS