



# **eMalahleni Water Reclamation Plant (EWRP)**

## **Environmental External Audit Report 2022/ 2023**

**Submitted as contemplated in section 24N(7)(d) of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) and Regulation 34 under Part 3 of Chapter 5 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 982) (EIA Regulations, 2014)**

**MDALA Reference Numbers: No.: 17/2/12/NK16  
MDEDET Reference Numbers: No.: 17/2/2/1(e) MP-5  
DEDET Reference No.: 17/2/13NK31**

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### Version Control

|      | Date          | Overview of Changes | Author                                    |
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| 0.2. | May 2023      | Internal Review     | Tebogo Mapinga                            |
| 0.3. | June 2023     | Legal Review        | Sarah Burford<br>Iman Damons<br>Adam Gunn |
| 0.4. | November 2023 | Authorise           | Bongeka Madolo                            |

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### Related Documents

| Document | Date | File name |
|----------|------|-----------|
|          |      |           |

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## ACRONYMS

|        |                                                                        |
|--------|------------------------------------------------------------------------|
| AMD    | Acid mine drainage                                                     |
| Anglo  | Anglo American Thermal Coal                                            |
| AOPL   | Anglo Operations Proprietary Limited                                   |
| BECSA  | BHP Billiton Energy Coal South Africa (Pty) Ltd                        |
| CE     | Consulting Engineer                                                    |
| DMR    | Department of Mineral Resources and Energy                             |
| DWS    | Department of Water and Sanitation                                     |
| EAP    | Environmental Assessment Practitioner                                  |
| EA     | Environmental Authorisation                                            |
| ECO    | Environmental Control Officer                                          |
| EIA    | Environmental Impact Assessment                                        |
| EMPr   | Environmental Management Programme Report                              |
| EO     | Environmental Officer                                                  |
| ECO    | Environmental Control Officer                                          |
| EIA    | Environmental Impact Assessment                                        |
| EMC    | Environmental Management/Monitoring Committee                          |
| EWRP   | eMalahleni Water Reclamation Plant                                     |
| HDPE   | High Density Polyethylene                                              |
| HiPRO  | Hi Recovery Precipitation Reverse Osmosis                              |
| IWULA  | Integrated Water Use License Application                               |
| MDEDET | Mpumalanga Department of Economic Development, Environment and Tourism |
| ML/day | Megalitre per Day                                                      |
| WUL    | Water Use License                                                      |
| NWA    | National Water Act 36 of 1998                                          |
| SABS   | South African Bureau of Standards                                      |

# 1. Introduction

## 1.1. Background

Thungela Operations (Pty) Limited (Thungela) has predominantly high quality thermal coal mines in South Africa by calorific value and export mainly to the Indian, Asian, SEA, Middle East and North African markets. The eMalahleni Water Reclamation Plant (EWRP) is situated about 120 km east of Johannesburg and approximately 15 km southwest of eMalahleni, within the Nkangala District Municipality of Mpumalanga province, South Africa. Refer to Figure 1 below for the locality map.

EWRP commenced operations in 2007 as a water reclamation scheme project that was owned by the Anglo-American Coal (Anglo) and BHB Billiton Energy Coal South Africa (BECSA) joint venture. Subsequently in 2021, Thungela demerged from Anglo American Plc and is now the owner of the EWRP. The treatment plant consists of a collection system that pumps excess acid mine drainage (AMD) affected water (surface and underground) daily from Greenside, Kleinkopje and South Witbank Collieries producing potable water that is then sent to the eMalahleni Local Municipality and the mines for use.

As part of the environmental legal requirements stated in Section 24N(7)(d) of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) and Regulation 34 under Part 3 of Chapter 5 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 982) (EIA Regulations, 2014 as amended) the following components of EWRP to commence with the treatment plant activities were authorised:

- Phase 1: The proposed mine water reclamation, treatment, and re-use scheme) issued by Mpumalanga Department of Economic Development, Environment and Tourism (MDEDET), previously known as Mpumalanga Department of Agriculture and Land Administration (MDALA) dated 2 November 2005 (Reference No.: 17/2/12/NK 16) and subsequently amended under MDALA (Reference No.: 17/2/12/NK 16 (H06-30)) dated 16 October 2006;
- Phase 2: The development entailed the expansion of the EWRP capacity to treating 50MI (peaking at 60MI) of mine water daily (MDEDET REF: 17/2/2/1(e) MP-5), dated July 2011.
- The construction of a 26 km pipeline from a water treatment plant at Greenside Colliery' to Phola Coal plant, Ogies, Mpumalanga (REF: 17/2/13NK 31), dated 08 March 2010.

NTC Group (Pty) Ltd (NTC) was appointed by Thungela as the independent Environmental Assessment Practitioner (EAP) to undertake the 2023 annual environmental authorisation (EA) and environmental management programme (EMPr) Compliance Assessment and this report presents the methodologies and findings thereof. This report fulfils the compliance assessment requirement for March 2022 – March 2023 period.

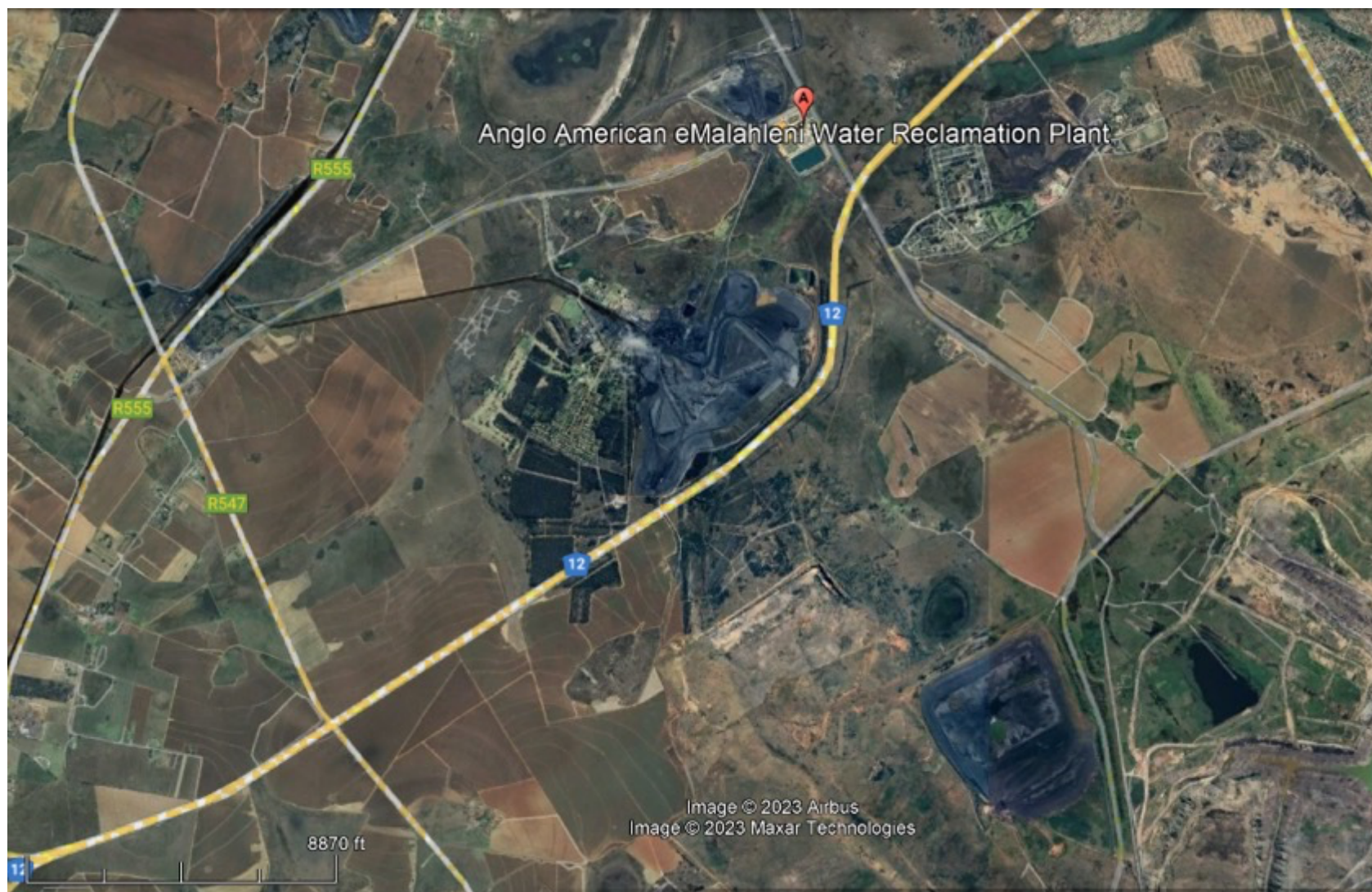


Figure 1: Locality Map of eMalahleni Water Reclamation Plant (Google Earth, 2023)

## 1.2. Terms of Reference

Section 24N(7)(d) of NEMA requires that the holder and any person issued with an environmental authorisation (EA) must monitor and audit compliance with the requirements of the EMPr or environmental management plan. Furthermore, Regulation 34 of the NEMA EIA Government Notice Regulation (GNR) 982 effected 2014 (as amended) states amongst others, that the holder of an EA must, for the period during which the EA, EMPr and the closure plan, in the case of a closure activity remain valid must: a) ensure that the compliance with the conditions of the Environmental Authorisation, the EMPr, and the closure plan is audited; and b) submit the environmental audit report to the relevant Competent Authority. Additionally, the audit findings must be verifiable, in a structured and systematic manner on the level of performance against and compliance of the organisation's EA, it further states that the recommendations to amend the EMPr for rectification of the shortcomings must be subjected to Public Participation for approval by the Competent Authority.

As a result of the above, the Environmental Authorisation and Environmental Management Plan is required to undergo regular auditing in accordance with NEMA EIA Regulations as stated and Appendix 7 as amended in the current EIA Regulation. The frequency is stipulated in the EA, specifically annually. Following from the above, compliance assessments on the approved Environmental Management Programmes for EWRP were assessed and include:

- Environmental Authorisations-
  - Phase 1: The proposed mine water reclamation, treatment, and re-use scheme) issued by Mpumalanga Department of Economic Development, Environment and Tourism (MDEDET), previously known as Mpumalanga Department of Agriculture and Land Administration (MDALA) dated 2 November 2005 (Reference No.: 17/2/12/NK 16) and subsequently amended under MDALA (Reference No.: 17/2/12/NK 16 (H06-30)) dated 16 October 2006;
  - Phase 2: The development entailed the expansion of the EWRP capacity to treating 50MI (peaking at 60MI) of mine water daily (MDEDET REF: 17/2/2/1(e) MP-5), dated July 2011.
  - The construction of a 26 km pipeline from a water treatment plant at Greenside Colliery' to Phola Coal plant, Ogies, Mpumalanga (REF: 17/2/13NK 31), dated 08 March 2010.
- Environmental Management Programmes-
  - Consolidated Phase 1 and Phase 2 EMPr dated 15 October 2021:
    - The EWRP's EMPr for the construction of the proposed mine water reclamation treatment and re-use scheme, dated 16 October 2006 (DME REF: OT 6/2/2/141); and
    - The EWRP's EMPr for the expansion of the Anglo Operations eMalahleni mine water reclamation scheme (REF: 17/2/2/1(EMP-5)), dated October 2010.
  - The EWRP's EMPr for the proposed construction of a pipeline from the water treatment plant at Greenside Colliery' to Phola coal plant issued by MDALA (REF: 17/2/13NK 31), dated 8 November 2006.

The compliance assessments on the approved EA and EMPr as stated above for EWRP were assessed and findings are detailed in Section 5.

### **1.3. Assumptions and Limitations**

The scope of the compliance assessment was to assess the environmental management practices being implemented during operation of the EWRP project, in accordance with the approved environmental authorisation and other authorisations/license/permits issued.

The objective of the audit included the review of documents, reports etc stated under Section 3 and interview persons, to determine if the operation phase of EWRP is compliant with approved EA and other permits.

The following assumptions and/or limitations will be applicable to the audit process and findings:

- This audit is a snap-shot representation of the EWRP operation, and the audit period assessed includes March 2022 – March 2023. Anything occurring prior to this period is assumed to have been audited previously and was thus not included herein. Therefore, such items were determined to be “Not Applicable”;
- Due to the nature and extent of the operation, not all areas were visited during the site assessment. Instead, specific areas representative of the operation and assessment period were selected to provide a demonstration of site operations.
- EWRP operation is under operational phase, however activities relating to construction, decommissioning, and/or closure and rehabilitation, that may have occurred on site during the audit period will be deemed applicable.
- Procedures developed by EWRP specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System by site personnel.
- Outdated/repealed legislation or referenced guideline documents in the EA and EMPr will be substituted for current/relevant legislation and referenced guideline documents.

## **2. Auditors**

NTC was established in 2005. It is 100% female black owned with a Level 1 Broad Based Black Economic Empowerment (BBBEE) Rating. We undertake our services with professional integrity and have built good reputations with stakeholders in the environmental management field including regulatory authorities and government departments. We undertake all our services within the requirements of applicable South African legislation, as well as acceptable international best practices, norms and standards. The details of the specific environmental consultants who completed and/or assisted with the Compliance Assessment is provided in Table 1.

**Table 1: Audit Team Contact Details**

| Role                   | Responsible Person                                                                                                                                                                                                                                                                                                                    | Contact Details                                                             |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| <b>Quality Control</b> | Tebogo Mapinga (Pr. Sci. Nat) is an Environmental Auditor (Environmental Executive) at NTC Group (Pty) Ltd. She has over 16 years' experience in the Environmental Management field including extensive experience within the mining sector. Tebogo provided quality assurance during the audit preparations and report compilations. | Tel: +27 11 462 2022                                                        |
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|                        |                                                                                                                                                                                                                                                                                                                                       | Email: <a href="mailto:tebogo@ntcgroup.co.za">tebogo@ntcgroup.co.za</a>     |
| <b>Auditor</b>         | Ethel Chifunda (MSc) is a Principal Consultant at NTC Group (Pty) Ltd. She has 7 years' work experience inclusive of Environmental Management within the mining sector. Ethel was the Lead Auditor who undertook the audit preparations, site assessment and audit report compilation.                                                | Tel: +27 11 462 2022                                                        |
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| <b>Auditor</b>         | Konanani Nelushi is the Environmental Compliance Manager at NTC Group (Pty) Ltd. He has over 8 years' experience in the Environmental Management field including experience within the mining sector. Konanani was the Auditor who undertook the audit preparations, site assessment and audit report compilation.                    | Tel: +27 11 462 2022                                                        |
|                        |                                                                                                                                                                                                                                                                                                                                       | Fax: +27 86 665 1864                                                        |
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## 2.1. Declaration Of Independence

The Environmental Assessment Practitioner General declaration:

I, Ethel Chifunda, declare that –

- I act as the independent environmental practitioner in this Audit;
- I will perform the work relating to the audit in an objective manner, even if this results in views and findings that are not favourable to the auditee;

I declare that there are no circumstances that may compromise my objectivity in performing such work;

- I have expertise in conducting environmental compliance audits, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have not and will not engage in, conflicting interests in the undertaking of the activity;
- I will provide the competent authority with access to all information at my disposal regarding the audit, whether such information is favourable to the auditee or not; will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Disclosure of Vested Interest:

I do not have and will not have any vested interest (either business, financial, personal or other) in the activity other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014.

Signature:   
Company: NTC Group (Pty) Ltd  
Date: November 2023

## 3. Audit Methodology

### 3.1. Information Collation and Review

NTC reviewed the Final Environmental Impact Assessment & Environmental Management Programme Report, Environmental Authorisation as well as other relevant permits, and compiled a checklist that contained the conditions that required compliance assessment. The audit evidence will be made available to the respective authorities by Thungela. The information verified during the audit includes *inter alia*:

- EWRP Phase 1 Environmental Authorisation (Ref: 17/2/12/NK 16)) dated 02 November 2005 and the Amendment (Ref:17/2/12NK 16 (H05-30)) dated 16 October 2006;
- Phase 1 Water Use License (WUL No. 24080138) dated 14 December 2007;
- Brine Pond License and registration (WUL No.: 12/2/B102/85) dated 05 March 2009;
- RoD ECA Pipeline Environmental Authorisation (Ref: 17/2/13 NK 31)
- EWRP Phase 2 Environmental Authorisation Amendment (Ref: 17/2/12/NK 16)) dated 21 July 2011;
- Phase 2 Water Use License (WUL No.: 04/B11G/ACFGI/1853) dated 03 August 2012;
- EWRP Brine Dam Waste Registration (Ref: D01526-01) dated 25 March 2013;
- Phase 1 Water Use License Amendment (WUL No.: 24080138) dated 25 April 2013;
- Phase 2 Water Use License Amendment (WUL No.: 04/B11G/ACFGI/1853) dated 26 May 2016;
- GA certificate - Brine Treatment Facility (Reg. No.: 24102221) 18 September 2018;
- Phase 1 Water Use License - Rev 2 (WUL No.: 04/B11J/AGJ/4134) dated 24 July 2019;
- NEW Phase 2 WUL (WUL No.: 04/B11J/AGJ/4134) dated 04 September 2019;
- EWRP Combined WUL (WUL No.: 04/B11G/ACFGI/1853) dated 14 August 2020;
- EWRP WUL 21 C&I (WUL No.: 06/B11G/CICI/11228) dated 22 February 2022;
- Greenside Colliery amended WUL (WUL No.: 06/B11F/CGI/9897) dated 22 March 2022;
- EWRP WUL 21a amendment (WUL No.: 04/B11G/ACFG/1853) dated 23 March 2022;
- Environmental-Legal Opinion for the Use of Abattoir Waste (Passive Plant), letter dated 26 April 2022;
- Environmental Management Programme report (EMPr): E-Malahleni Mine Water Reclamation Scheme Expansion EIA – Final EIA Report, dated October 2010;
- Environmental Management Programme report (EMPr): Emalahleni Water Reclamation Project, dated 31 August 2006;
- Environmental Management Programme (including EIA Report and I&AP Comments), dated 31 August 2006;
- Environmental Impact Report (Greenside/Phola Coal Plant water pipeline), dated November 2006;

- Consolidated Environmental Management Programme (Emalahleni Water Reclamation Plant), Dated 07 September 2020;
- Proof of submission DWS, 27 February 2018;
- DWA comments of the EIA report (Emalahleni Water Reclamation Project), dated 28 June 2005;
- Letter to DWA on delay in granting WUL Phase 1, dated 05 December 2005;
- DWA response on Dam Safety Application, dated 11 September 2006;
- DWA letter on illegal construction of dam without registration, dated 25 April 2007;
- Letter to DWA Follow up on comments received on delay, dated 13 July 2007;
- Letter to DWA with Outstanding info for WUL Borehole coordinates, 06 August 2007;
- Letter to DWA with regards to Amendment application for Phase 1, 24 May 2010;
- DWS letter with regards to the outstanding information for WUL application, 16 November 2011;
- Letter to DWS to amend the integrated WUL (WUL No.: 2408013), dated 12 September 2012;
- Letter to DWS with regards to amendment application for Phase 2, dated 18 January 2013;
- Letter to DWS with regards to amendment application Phase 1, 30 January 2013;
- Letter to DWS with regards to Rehabilitation plan submission, 12 May 2013;
- DWS Acknowledgement letter for the change of construction method, 27 August 2014;
- Letter to DWS with regards to amendment application for Phase 2, 10 November 2014;
- Letter to DWS with response to the requested additional documents, dated 14 November 2014;
- Water Use License Amendment Application Report, dated June 2015;
- Notification of commencement of water use, dated 15 August 2014;
- Appointment of a responsible person who must give effect to the various license conditions and to ensure compliance to the license, dated 07 August 2017;
- Notification to quality exceedance to DWA, dated August 2017;
- Notification of volume exceedance to DWA, dated August 2017;
- Submission of as built drawings to DWA, dated August 2017;
- Submission of external WUL audit 2016 to DWA, dated August 2017;
- Summary of amendments
- Emalahleni Water Reclamation Plant IWUL Confirmation, dated 12 September 2012;
- Technical Memorandum, Greenside water treatment plant – activities to be reflected in the ROD, dated 21 February 2006;
- Site Notice for Environmental Impact Assessment (EIA) for the Anglo Coal Expansion of the Emalahleni Mine Water Reclamation Scheme, Emalahleni, Mpumalanga Province, dated October 2009;
- Motivation statement in respect of proposed amendment to the ROD Conditions 1.4, 3.1, 6.2, and 6.5, dated 25 January 2006;
- Notification of issued EA for ROD, dated 3 November 2005;
- EWRS Phase 2 meeting minutes, dated 20 November 2012;
- Water Use License – Part 1 (WUL No.: 24080138), dated 14 December 2007;

- Water Use License – Part 2 (WUL No.: 24080138), dated 14 December 2007;
- Emalahleni Water Reclamation Scheme Phase 2 Expansion: Integrated Water Use License Amendment Application – Response to Your Request for Additional Information, dated 15 February 2012;
- Water Use Licence Application Additional Information - Emalahleni Water Reclamation Scheme Phase 2 Expansion Project, 06 February 2012;
- Wetland Layout Plan Phase 2 (GIS – 11613486-WULA-100-000);
- Layout Plans
  - (c)5270-0588-CED-003\_WULA Add Info\_App\_C\_RevC
  - (c)5270-0588-CED-004\_WULA Add Info\_App\_C\_RevC
  - (c)5270-0588-CED-005\_WULA Add Info\_App\_C\_RevC
  - (c)5270-0588-CED-006\_WULA Add Info\_App\_C\_RevC
  - (c)5270-0588-CED-009\_WULA Add Info\_App\_C\_RevC
  - (d)11613486\_WULA Add Info\_App\_D\_RevC
- Technical Memorandum on Wetland Study, dated 14 February 2012;
- Submission of as built drawing letter to DWA, dated 15 August 2017;
- EWRS Phase 2 DWA meeting presentation, dated 24 November 2011;
- EWRS Phase 2 DWA meeting minutes, dated 24 November 2011;
- Dam failure analysis for the Brine Disposal Facility at Witbank, dated 31 May 2006;
- Brine dam application forms, dated 25 July 2006;
- Drawings Showing Depth of Pipe
  - 5270-0588-CED-011\_Rev\_1
  - 5270-0588-CED-034\_Rev\_0
- Geotech Drawings:
  - 12278-9937-10\_App A\_Fig 1
  - 12278-9937-10\_App B
  - 12278-9937-10\_Geotech Kromdraai-Navigation\_Rev0\_110219
  - EWRP\_Pipelines (kmz.)
  - INVESTIGATION 1 (kmz.)
  - Kromdraai Geotech (kmz.)
  - Navigation Reservoir (kmz.)
  - Kromdraai New (KMZ.)
  - Kromdraai Pump Station (kmz.)
  - Navigation\_Borehole\_Points (kmz.)
  - Proposed Route (kmz.)
  - Proposed Route1 (kmz.)
  - Schoongesicht Reservoir (kmz.)
- Pigging Procedure – Kromdraai to Schoongezicht, dated 25 August 2015;
- Servitude Management:
  - Afrox Approved Wayleave – Anglo American, dated 12 February 2014;

- Eskom Servitude, dated 21 May 2013;
- Ferrobank Sewage Works Overflow, dated October 2013;
- Telkom Wayleave, dated 13 December 2010;
- Telkom Wayleave, dated 12 February 2014;
- Transnet - Crossing pipeline servitude A431/1979, dated 27 January 2014;
- Soil Stripping Plan:
  - Clearing and Grubbing Method Statement, approved on 07 March 2014;
  - Thermal Coal eMalahleni Water Reclamation Plant - Excavation Procedure, dated 21 November 2011;
  - Thermal Coal eMalahleni Water Reclamation Plant – Servitude Management Procedure, dated 21 November 2012;
  - Excavation and trenching method statement, approved 10 June 2014;
- Wetland Crossing Drawings:
  - 5270-0588-CED-081\_Rev\_0;
  - Directional Drilling Contract, 24 June 2013;
  - Horizontal Directional Drilling (HDD) with the TERRA-JET;
  - Wetland Crossing Method Statement; Approved 07 July 2014;
- Biomonitoring feedback and recommendations to DWS License number, dated 30 October 2015;
- Schedule of the Proposed Amendment to the Anglo Operations Limited Licence Number: 24080138, Ref No. 16/2/7/B100/H3/3;
- Appendix 1 - Rehab plan submission letter to DWS, dated 02 May 2013;
- Appendix 2 - Notice on Rehab plan submission timeline, dated 12 September 2012;
- External Water Use Licence Compliance meeting minutes, dated 07 November 2017;
- Letter of Submission of Water Use License Amendment Applications, dated 29 November 2017;
- TLI Ideas eMalahleni Municipality permit (Permit No.: ENV 2021/011), dated 13 December 2022;
- Pistorius\_Certificate of Registration of Fertilizer\_Gypsum (Reg. No.: B 4067), dated 12 March 2013;
- Waste Manifests:
  - TL Ideas General Waste manifest documents: June 2022 – November 2022;
  - TL Ideas Hazardous Waste manifest documents – 2022 (June, July, August, September, October, November); 2023 (January, March)
- Certificate of Registration – Waste Transport Hazardous (Reg. No.: GPT-07-645), dated 30 September 2021;
- System Drinking Water Quality Compliance, dated 19 January 2023;
- Certification of Section 26 of National Water Act (Act No. 36 of 1998) as a Class A for the operation of water care works used for the purification or treatment of water, dated 24 February 2023;

- Water Supply Agreement section 1 to 6 between Anglo American and Emalahleni Local Municipality, dated 31 May 2007;
- EWRP Regulation 34 Risk Report;
- Regulation 34 Stakeholder Engagement Approach, dated 19 December 2019;
- Notification to erect a new substation, armtank and pipelines over undermined ground, dated 23 September 2005;
- Notification to erect a water treatment plant and Brine/Sludge disposal sites over undermined ground, dated 23 September 2005;
- Notification of EA issued, dated 22 July 2011;
- Water Use License for EWRP 21 C&I (WUL No.:06/B11G\CICI/11228), dated 22 February 2022; and
- EWRP Environmental Audit Report, dated March 2022.
- EWRP Procedures
  - Spill Kit Procedure, Doc No' SS-WTP-PRO-1417, Approved 02/11/2022.
  - Waste Management Procedure, Doc No' SS-WTP-PRO-1502, Approved 17/01/2023.
- Occupational Hygiene Survey for Water Reclamation Treatment Plant on behalf of Ventgiene (Ref: HOHL/WRTP/0223), dated 10/02/2023.
- EWRP Name Change Notification Authority Correspondence, letter dated March 2022.
- Monthly Water Balance Reports – April 2022 to December 2022; January 2023 – March 2023)
- Thungela Resources October 2022 ( Subsurface collection sump Q4), dated 11/11/2022.
- DWQ Blue Drop Annual compliance report 2022
- DWQ Blue Drop compliance report Jan-March 2023
- Stormwater Management Plan, Doc No' SS-WTP-PRO-1685, Implemented 05/09/2023
- Flowmeter Verification (Maintenance reports), Report by Endress + Hauser dated 23 July 2022: Brine Dump Phase 1, Brine Dump Phase 2, Cairns Portable, Greenside Feed, Greenside Portable, Izibulo Feed, KK900, Lime Make-up Phase 1, Lime Make-up Phase 2, Municipality Feed, Navigation Feed, serial number, Phola Portable, Plant Feed Phase 2, Sace Portable, South Witbank, Stage 1 RO's Product, Stage 2/3 RO's Product, Transfer Pump.\
- Proof submission to DWS External WUL Report, Dated 28 August 2022
- SHE Visitors Induction dated 23 March 2023
- EWRP Site Specific Induction 2023 (Hazard Awareness, Emergency Preparedness, Emergency Assembly points, Lightning Tarp, General Information (Speed Limit, Red Zones, Pedestrian crossing, use of cell phones, media), High risk work, Firefighting, PPE, Walkways and Stairs, Health, Waste management, WUL, Environmental Incident Reporting, Spillage Containment, Surface Flooding event, Smoking areas, Certificate of fitness for work, Alcohol and drugs, Injuries, Lifting and electronic equipment, Competency, Security, Chemical Splashes, Eyethu Rules.
- Emergency Preparedness Procedure, Approved 25 August 2023
- Mass Balance Report January 2022 to February 2023.

### 3.2. Site Verification

The site assessment and document review were completed on 09 March 2023 by Ethel Chifunda (NTC), Konanani Nelushi (NTC), Anela Sotashe (NTC), Kgaowelo Moshokwa (Thungela), Silindokuhle Buda (Thungela), Shenelle Emmanuel (Thungela), and Bongeka Madolo (Thungela); Adam Gunn (Pinsent Masons Africa LLP), Sarah Burford (Pinsent Masons Africa LLP) and Iman Damons (Pinsent Masons Africa LLP) (refer to Appendix A: Attendance Register). During the site assessment, additional documents were collated, and information was verified, EWRP personnel were interviewed and selected areas were visited i.e., verified using photographic evidence presented in Appendix B: Photo Plate.

### 3.3. Assessment Methodology

NTC assessed each of the EA and EMP conditions per the criteria provided in Table 2. Only conditions in the non-compliance category were given recommendations for rectification. The audit approach was guided by the requirements of the ISO 19011:2018 Guidelines for Auditing Management Systems. The audit scope was based on Section 34 and Appendix 7 of the EIA Regulations, 2014 as amended, which defines the key objectives of an audit as follows:

- Report on the level of compliance with the conditions of the EAs and the EMPs and the extent to which the avoidance, management and mitigation measures provided for in the EMPs.
- To identify and assess any new impacts and risks as a result of undertaking the activity;
- To evaluate the effectiveness of the EMPs;
- To identify shortcomings in the EMPs; and
- To identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPs.

Table 2: Assessment Criteria

| Criteria             | Acc       | Description                                                                                                                                                                                                                                                                                                                                                 |
|----------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compliant</b>     | <b>C</b>  | Full Compliance is when the construction or operational activities comply with the EA/EMP conditions. No mitigation measures are required where operations comply and are adequate.                                                                                                                                                                         |
| <b>Non-Compliant</b> | <b>NC</b> | Non-Compliance is when construction or operational activities are in contravention with the EA/EMP conditions and have the potential to impact on the environment in a detrimental manner. Non-compliance may also be associated with activities breaching legislation. Non-Compliance findings have a high priority and mitigation measures are mandatory. |

| Criteria              | Acc        | Description                                                                                                                                                                                                                              |
|-----------------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Not Applicable</b> | <b>N/A</b> | Not Applicable is assigned to EA/EMPr conditions which no longer occur, that do not apply to current activities that may be incorrect and require amendment, fall outside the audit period and/or are duplicates of existing conditions. |

## 4. Audit Findings

This section is aimed at highlighting the identified non-compliances so that EWRP can prioritise implementation of recommendations and rectification actions. The full audit details are included in Table 3 to Table 9.

The overall findings of this audit are indication of EWRP to its EA/EMPr authorised conditions, and no mitigation measures are required where conditions comply and are adequate for current activities. The summary of EA and EMPr findings is summarised below.

#### 4.1. Audit Findings

**Table 3: EMALAHLENI WATER RECLAMATION PLANT CONSOLIDATED ENVIRONMENTAL MANAGEMENT PROGRAMME (Dated September 2021)**

| REF                       | PROJECT ACTIVITY                                                                                                                           | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                             | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                    |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CONSTRUCTION PHASE</b> |                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                                                                                                                                                                                                                                                                                 |
| 1.                        | <b>GEOLOGY</b>                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                                                                                                                                                                                                                                                                                 |
| 1.1                       | Possible blasting of hard rock                                                                                                             | Implement appropriate blasting techniques which keep blast shock to a minimum                                                                                                                                                                                                                                                                                                          | N/A   | This condition falls outside this audit scope/period. No construction activities relating to blasting were undertaken during this audit period.<br>NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                       |
| 1.2                       | Excavations and earthworks.                                                                                                                | Use only non-carbonaceous material such as felsite, to improve the quality of in situ materials for foundations or pipeline construction.                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. No construction activities relating to excavation and earthworks were undertaken during this audit period.<br>NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                      |
|                           |                                                                                                                                            | Ensure that excavated material used in the construction of storm water control measures at the treatment plant are placed directly at the location where the material is to be used to minimise multiple handling of the material.                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. No construction activities relating to excavation and earthworks were undertaken during this audit period.<br>NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                      |
| 2.                        | <b>TOPOGRAPHY</b>                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                                                                                                                                                                                                                                                                                 |
| 2.1                       | During construction, the temporary stockpiling, compaction of in situ material, excavation, mixing, and replacement of excavated material. | Excavated material is to be stockpiled in windrows not exceeding 1.5 m in height adjacent to the excavation for the collection and distribution pipelines.                                                                                                                                                                                                                             | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|                           |                                                                                                                                            | Use excess excavated material from the treatment plant site to construct storm water control berms prohibiting water from leaving the site.                                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|                           |                                                                                                                                            | Storm water cut-off drains should be located regularly along construction servitudes.                                                                                                                                                                                                                                                                                                  | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|                           |                                                                                                                                            | Separate stripping of the material is required when constructing bulk earthworks to ensure that excavated clays, loams, and plinthic materials are not mixed, and can be returned in the former position during rehabilitation.                                                                                                                                                        | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|                           |                                                                                                                                            | Ensure that rehabilitation areas are ripped to a suitable depth (minimum of 500 mm).                                                                                                                                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|                           |                                                                                                                                            | Topsoil must be replaced after pipeline installation for a rehabilitation cover to the pipe trench. Should any residual material remain after the pipeline excavation has been refilled – over and above that heaped over the trench to allow for settling and compaction, this material must be used in the construction of storm water control measures at the treatment plant site. | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |

| REF | PROJECT ACTIVITY              | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                         | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                      |
|-----|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                               | Ensure that the area is shaped to be free draining after rehabilitation is complete.                                                                                                                                                               | C     | No non-compliance observed and adequate rehabilitation cover around EWRP was observed by the auditor and the specified parameters of free drainage as per the EMP.                                                                                                                                                                                                |
|     |                               | Profile the area to be the same as the original topography.                                                                                                                                                                                        | C     | The auditors observed no non-compliance. Imagery comparison around permanent infrastructure have undergone rehabilitation to similar topography as original.                                                                                                                                                                                                      |
|     |                               | Profile the area in such a manner that settling and compaction of the soil over a pipeline is allowed for, and that once this has occurred the final profile will be the same as the original topography                                           | C     | The auditors observed no non-compliance. Imagery comparison around permanent infrastructure have undergone rehabilitation to similar topography as original.                                                                                                                                                                                                      |
|     |                               | Harrow the area after seeding to ensure that the topography is re-established so that deep furrows are avoided.                                                                                                                                    | C     | The auditors observed no non-compliance. Revegetation was established to previous topography and no deep furrows around permanent infrastructure were observed.                                                                                                                                                                                                   |
|     |                               | A surface water drainage plan should be compiled prior to construction.                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period and were not verified. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                             |
|     |                               | Establish clean and dirty water cut off and containment drains to ensure that dirty water is maintained within the plant area and disposal facility. Clean water must be taken around the facilities and discharged into natural drainage courses. | C     | The separation of clean and dirty water was confirmed on site through site observations. The Plant is designed such that all dirty surface water will collect at the environmental sump from where it is re-pumped back into the EWRP process. Only treated clean water is released from the Plant to the nearby Naauwpoortspruit. Refer to Appendix B: Photo 12. |
|     |                               | Gabions (erosion control measures) are required prior to the discharge of water to natural water resources in areas where high stream flow velocities are expected due to the canalisation of water.                                               | C     | No non-compliance observed during the audit period. Velocity reduction measures are in place prior to discharge and include: A V-trench that opens into an infiltration trench/ canal that is backfilled with mini gabions (rock and geotextile lined with evidence of established vegetation growth). Refer to Appendix B: Photo 13                              |
| 3.  | SOIL                          |                                                                                                                                                                                                                                                    |       |                                                                                                                                                                                                                                                                                                                                                                   |
| 3.1 | Excavating pipeline trenches. | Where possible, locate pipelines in existing mine trenches positioned within 10-30 m of the proposed pipeline routes.                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                    |
|     |                               | A minimum of 300 mm of topsoil is to be stripped and stockpiled separately. Topsoil stripping should be undertaken along with the vegetation seedbed to facilitate in re-vegetation of the area.                                                   | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                    |
|     |                               | Excavated material should be stockpiled in a manner where it can act as storm water control berms.                                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Stormwater infrastructure construction have been completed, therefore the condition parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                             |
|     |                               | Storm water cut-off drains should be located regularly along construction servitudes and the pipeline routes to avoid erosion of stockpiled materials.                                                                                             | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                    |

| REF | PROJECT ACTIVITY | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                            | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                            |
|-----|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                  | Pipeline trenches should be backfilled shortly after the pipeline has been declared leakage free.                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                          |
|     |                  | Should any residual material remain after the excavation has been refilled – over and above that heaped over the trench to allow for settling and compaction, this material must be used in the construction of storm water control measures at the treatment plant site.             | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                          |
|     |                  | Conserve the stockpiled topsoil by protecting it against erosion; do not stockpile topsoil long enough to lose function.                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                          |
|     |                  | Rehabilitate backfilled pipeline trenches. Loosen and level soils with a ripping and disc action and seed with 2 or 3 annual local species. Lime should be applied at 1 ton per ha after the ripping action and can be worked into the upper 100-150 mm of soil with the disc action. | N/A   | No non-compliance observed. Pipeline trenches were backfilled, and topography was similar to original profiles. However, soil loosening and lime applications stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                          |
|     |                  | Once material is returned in its former position, the area must be re-vegetated using a Thungela approved seed mix.                                                                                                                                                                   | C     | No non-compliance observed. Revegetation was noted around built infrastructure.                                                                                                                                                                                                                                                                         |
|     |                  | Disturbed soils will be remediated with a suitable fertiliser determined on the basis of soil sampling and analysis.                                                                                                                                                                  | N/A   | This condition falls outside this audit scope/period. Soil sampling activities to ensure best fit fertiliser use were not verified during the audit period as the condition parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                  | Gabions/other dispersion measures must be installed at all discharge points from any stormwater control systems to ensure that stream flow velocities are not significantly increased to such an extent that erosion may occur.                                                       | C     | No non-compliance observed during the audit period. Velocity reduction measures are in place prior to discharge i.e., mini gabions (rock and geotextile lined with evidence of established vegetation growth) were noted onsite at stormwater control points.<br>Refer to Appendix B: Photo 12                                                          |
|     |                  | Erosion should be monitored and stabilised as soon as possible wherever it occurs.                                                                                                                                                                                                    | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                          |
|     |                  | A soil stripping and erosion plan must be compiled.                                                                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                          |
|     |                  | Uncultivated soils have to be ripped to an average bulk density similar to the condition prior to construction.                                                                                                                                                                       | C     | No non-compliance observed. Pipeline trenches were backfilled, and topography was similar to original profiles. However, soil loosening and lime applications stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                          |
|     |                  | All disturbed areas must be profiled and stabilised, and erosion control measures must be installed in places identified as being at risk of erosion.                                                                                                                                 | C     | No non-compliance observed. Pipeline trenches were backfilled, and topography was similar to original profiles. However, soil loosening and lime applications stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                          |

| REF | PROJECT ACTIVITY                                                                                                 | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.2 | Backfilling pipeline trenches                                                                                    | Topsoil and excavated material is to be stockpiled in separate windrows not exceeding 1.5 m in height, adjacent to the excavation for the collection and distribution pipelines.                                                                                                                                                                                                                                                                                                                                                   | C     | No non-compliance observed. Pipeline trenches were backfilled, and topography was similar to original profiles. However, soil loosening and lime applications stated herein are not applicable during this audit period.                                                                                                                                                                                                                                                            |
|     |                                                                                                                  | All soils stripped from the vehicle park/site office area have to be replaced and spread uniformly.                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
|     |                                                                                                                  | Separate stripping of the material is required to ensure that excavated black/yellow clays, loams, and plinthic/saprolitic materials are not mixed, and can be returned in their former position during rehabilitation.                                                                                                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
| 3.3 | Backfilling pipeline trenches on rehabilitated land (along the Kromdraai collection pipeline route specifically) | In mining areas that have been rehabilitated, mixing coaliferous spoil material with topsoil should be avoided at all costs. Spoil material should by no means be penetrated and trenches should be excavated only to the depth of the spoil material. After the trench is backfilled, soil should then be graded from both sides on top of the closed trench to create a berm of 300 to 500 mm high in order to provide more protection to the pipeline and which can simultaneously serve as a method to demarcate the pipeline. | N/A   | This condition falls outside this audit scope/period. No mining activities are taking place on the EWRP site. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. Nonetheless, the Kromdraai route deterred as far as possible from mined areas to ensure pipeline protection. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 3.4 | Use of mechanical equipment                                                                                      | Ensure that rehabilitated areas are ripped to a suitable depth (minimum of 500 mm or to refusal).                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
| 3.5 | Oil and fuel spillages from mechanical equipment                                                                 | Contamination due to oil and fuel spillages should be avoided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
|     |                                                                                                                  | Strict guidelines should be given to contractors in terms of the mechanical condition of equipment used, the maintenance of equipment as well as the reporting and cleaning up procedures of spillages, should they occur.                                                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
|     |                                                                                                                  | All oil contaminated or otherwise polluted soil and wastes from the construction areas is to be removed to licensed landfill sites using a registered waste disposal company.                                                                                                                                                                                                                                                                                                                                                      | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
| 4.  | LAND CAPABILITY                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4.1 | Excavating pipeline trenches.                                                                                    | The pipelines should be buried more than 1 m below the surface where possible to ensure that land capability can return to its pre-construction state with the exception of wetland areas, where the pipeline should not be buried at all (see Section 7).                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore construction parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                      |
|     |                                                                                                                  | A mutually acceptable agreement must be drawn up with landowners to compensate them in the event of crop loss and servitude rights.                                                                                                                                                                                                                                                                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Pipeline construction activities have been completed, therefore crop loss and servitude right compensation herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                          |

| REF | PROJECT ACTIVITY                                                               | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                           | COMPL                             | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                 |
|-----|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                | See 3.1-3.5 above.                                                                                                                                                                                                                                                                                                                                   | Conditions<br>3.1 – 3.5<br>refers | Conditions 3.1 – 3.5 refers.                                                                                                                                                                                                                                                                                                                 |
| 5.  | ECOLOGY: TERRESTRIAL FLORA AND FAUNA                                           |                                                                                                                                                                                                                                                                                                                                                      |                                   |                                                                                                                                                                                                                                                                                                                                              |
| 5.1 | Vegetation clearing and stripping of topsoil during pipeline, etc construction | Areas where disturbance is permissible should be demarcated prior to construction activities taking place.                                                                                                                                                                                                                                           | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Ensure that environmental education of mine staff takes place at all levels to limit unnecessary damage to habitats and/or disturbance of fauna. This education will form part of the mine's induction programme.                                                                                                                                    | C                                 | Site specific induction of all EWRP personnel is compulsory and includes environmental awareness (verified in the 2023 site specific environmental induction).                                                                                                                                                                               |
|     |                                                                                | Vegetation audits need to be conducted prior to commencement of construction activities. These audits need to be conducted in the construction demarcated areas located in areas of a high and moderate sensitivity (including secondary grasslands). These areas may contain protected species, such as Brunsvigia radulosa and Gladiolus ecklonii. | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Should any plants of medicinal or conservation significance within the construction footprint be identified during the construction phase these plants should be removed and replanted within protected landscapes. The services of a certified expert should be contracted in the event that such measures are required.                            | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Daily audits need to be conducted ahead of construction to identify if any fauna need to be relocated, especially burrowing mammals.                                                                                                                                                                                                                 | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Should any protected species or burrowing mammals be found within an area demarcated for construction, no disturbance to this area should take place. If this is not possible, the protected species or mammal must be relocated.                                                                                                                    | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | All exotic and invasive species should be removed within the 20 m construction servitude.                                                                                                                                                                                                                                                            | N/A                               | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Indigenous and currently occurring species, such as Eragrostis species, should be planted in rehabilitated areas and maintained.                                                                                                                                                                                                                     | C                                 | No non-compliance observed. Rehabilitated areas around built infrastructure had been revegetated with indigenous species i.e. Eragrostis species that form part of Thungela's approved seed mix.                                                                                                                                             |

| REF | PROJECT ACTIVITY                                                               | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                 | COMPL                          | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                 |
|-----|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                | All replanting activities should be undertaken at the end of the dry season (middle to end September) to ensure optimal conditions for germination and rapid vegetation establishment                                                                                                                                                                                                      | C                              | No non-compliance observed. Replanting activities are undertaken as part of the site's ongoing maintenance as and when required and adhere to the condition parameters herein.                                                                                                                                                               |
|     |                                                                                | All areas that were planted pasture or natural vegetation before construction must be reseeded.                                                                                                                                                                                                                                                                                            | C                              | No non-compliance observed. Rehabilitated areas around built infrastructure have been revegetated to similar topography profile prior to construction.                                                                                                                                                                                       |
|     |                                                                                | Only reseed with an approved Thungela seed mix suited to wetland and riparian zones.                                                                                                                                                                                                                                                                                                       | N/A                            | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | An agricultural roller must be used to cover seeds.                                                                                                                                                                                                                                                                                                                                        | N/A                            | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Inspect rehabilitated areas at three monthly intervals during the first and second growing season to determine the efficacy of rehabilitation measures.                                                                                                                                                                                                                                    | N/A                            | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                                | Remedial action is required where vegetation establishment has not been successful or erosion is evident. For instance, areas showing bare patches of more than 1m <sup>2</sup> after three months from seeding, must be loosened and reseeded along with a light mulch of veld grass.                                                                                                     | C                              | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. No erosion was observed during this audit period and any problems that arise are addressed immediately.                                                                                                                              |
|     |                                                                                | Grazing livestock need to be kept away from rehabilitated areas, for two growing seasons.                                                                                                                                                                                                                                                                                                  | N/A                            | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 5.2 | Presence of machinery and human activities.                                    | Vehicles must stay on demarcated roads and parking areas to avoid unnecessary damage to areas of natural vegetation.                                                                                                                                                                                                                                                                       | C                              | No non-conformances observed during the audit period.                                                                                                                                                                                                                                                                                        |
|     |                                                                                | See Condition 10 below (noise).                                                                                                                                                                                                                                                                                                                                                            | Condition 10 compliance refers | Condition 10 refers.                                                                                                                                                                                                                                                                                                                         |
| 5.3 | Vegetation clearing and stripping of topsoil during pipeline, etc construction | Weeds, especially Khakibos ( <i>Tagetes minuta</i> ), Blackjack ( <i>Bidens pilosa</i> ) must be controlled with a broadleaf herbicide that is non-toxic to the aquatic environment and is used sparingly. Larger identified alien species such as the Black Wattles ( <i>Acacia mearnsii</i> ) and the Red Gums ( <i>Eucalyptus camaldulensis</i> ) must be removed in entirety manually. | N/A                            | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore vegetation clearing and stripping of topsoil conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |

| REF | PROJECT ACTIVITY                                | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                      | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                  |
|-----|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                 | An ongoing alien invasive control programme should be implemented for the duration of the project. All exotic and invasive species should be removed within the 20 m servitude.                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed, therefore alien invasion monitoring during construction conditions herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 6.  | ECOLOGY: AQUATICS                               |                                                                                                                                                                                                 |       |                                                                                                                                                                                                                                                                                                                                               |
| 6.1 | Construction of pipeline/watercourse crossings. | Clean up and rehabilitate any accidental spillages.                                                                                                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Devise and implement a relocation plan if rare and sensitive species are identified during construction.                                                                                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Implement dust suppression on dirt roads.                                                                                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | At sites 1, 3, 4 and 5, construct the proposed pipelines as close to the existing upstream road servitudes as possible.                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Place the relevant sections of the pipelines below the groundwater flow component of the streams and wetlands so as to not impede the flow and impact the sites once construction is completed. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Construct pipeline / watercourse crossings during the dry season.                                                                                                                               | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Construct pipeline / watercourse crossings in stages so as to limit the impact to the sites. As one stage is complete, rehabilitate the habitat before starting the next construction section   | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Implement low impact construction techniques so as to minimise the impact on the river system, especially during the diverting of any water during construction.                                | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Where possible, keep construction activities out of wetland areas. Limit movement of construction vehicles within wetlands. Restrict vehicles to service roads.                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |
|     |                                                 | Implement suitable vegetation and habitat rehabilitation where construction site impacts occur. This should be done in consultation with a suitably qualified person.                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                    |

| REF | PROJECT ACTIVITY                           | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                     | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                               |
|-----|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                            | Where wetland soils have been compacted, labourers should loosen soils with light weight tools.                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Implement corrective mitigation measures should any significant decrease in ecological integrity occur (both aquatic and wetland) within any biomonitoring period as a result of impacts associated with the pipeline / watercourse crossings. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 7.  | SURFACE WATER                              |                                                                                                                                                                                                                                                |       |                                                                                                                                                                                                                                                                                                            |
| 7.1 | Pipeline construction across watercourses. | All mitigation measures for soil, vegetation, wetlands, and sensitive landscapes should be implemented.                                                                                                                                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Construction roads should be planned prior to commencement of the Construction Phase to ensure that the minimum numbers of roads are located in wetland or natural vegetation areas.                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | During backfilling, soils should be well compacted and vegetation re-established as soon as possible to prevent erosion                                                                                                                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Construction activities within the 1 in 50- and 1 in 100 year floodlines should be limited as far as possible. No construction sites/camps should be located within the 1 in 50- and 1 in 100 year floodlines.                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | All soil and rock and gravel stockpiles should be located outside the 1:50 year floodline.                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Turbidity and sedimentation downstream of the nearby water resources must monitored for at least two rainy seasons.                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Vehicle traffic in watercourses should be limited in frequency, and avoided during wet periods.                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Watercourse crossings should be constructed during the dry season.                                                                                                                                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                            | Strip wetland soils separately according to colour and replace in the same order according to the former position in the soil profile to avoid significant mixing of soils.                                                                    | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |

| REF | PROJECT ACTIVITY                                                          | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                    | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                               |
|-----|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                           | Only non-carbonaceous fill material should be used for pipeline / watercourse crossing sites.                                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Ensure that wetland soils are adequately ripped in areas of disturbance to ensure regrowth of the vegetation and percolation of water is optimal.                                                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Riverbanks over the disturbed areas should be profiled to emulate the adjacent undisturbed slopes.                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Only reseed with an approved Thungela seed mix suited to wetland and riparian zones.                                                                                                                                                          | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Soil and vegetation must be rehabilitated before the next rainy season.                                                                                                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 8.  | GROUNDWATER                                                               |                                                                                                                                                                                                                                               |       |                                                                                                                                                                                                                                                                                                            |
| 8.1 | Accidental spillage of oil or other hydrocarbons and pollutants           | Implement pollution prevention techniques on all construction equipment, e.g. drip trays on trucks                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Immediately remove soils contaminated with oils and other hydrocarbons or pollutants and dispose as hazardous waste                                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 9   | AIR QUALITY                                                               |                                                                                                                                                                                                                                               |       |                                                                                                                                                                                                                                                                                                            |
| 9.1 | Vehicles traversing the construction sites; excavating pipeline trenches. | Ensure that dust suppression measures are implemented on exposed soils and dust generating roads, e.g. where dirt roads are travelled, these routes must be watered on a regular basis, alternatively, a dust suppressant can be made use of. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Construction vehicles and other traffic to and from the construction site should be restricted to specific roads or routes.                                                                                                                   | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|     |                                                                           | Traffic should, where possible, make use of existing tar roads to reach the site.                                                                                                                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |

| REF  | PROJECT ACTIVITY                                                                                | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                            | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                               |
|------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                 | Ensure that vehicles are serviced regularly and that vehicles with emission problems are identified speedily and rectified.                                                                                                                                                                                                                                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 10.  | NOISE AND VIBRATION                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |       |                                                                                                                                                                                                                                                                                                            |
| 10.1 | Blasting in areas of hard rock along the proposed pipeline routes.                              | Apply due diligence and all industry-accepted methods to limit factors contributing to the development of a shockwave and noise as a result of blasting.                                                                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Ensure that sufficient consultation with all potentially affected landowners occurs prior to blasting.                                                                                                                                                                                                                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Control blasting operations to ensure sound pressure levels are kept below the generally accepted 'no damage' level of 140 dB, or any other levels that may apply to a specific area as determined by municipal ordinances, etc.                                                                                                                                                                                                                      | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 10.2 | Other construction related activities, such as movement of heavy machinery and vehicle traffic. | Limit construction working hours to between 6am and 6pm in areas where local residents may be affected, and to week days.                                                                                                                                                                                                                                                                                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Heavy vehicle traffic from the colliery should not be permitted to travel on public roads at peak hour traffic times between 7am and 9am and between 4pm and 6pm.                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Specified travel routes should be identified for heavy vehicle traffic. These routes should limit the impact of heavy vehicle traffic on road users. To identify the preferred routes for the construction vehicles, a traffic impact study may be necessary.                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Ensure efficient design and maintenance of silencers on diesel-powered vehicles and equipment.                                                                                                                                                                                                                                                                                                                                                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                 | Train personnel to adhere to operational procedures that reduce the occurrence and magnitude of individual noisy events.                                                                                                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 11.  | HERITAGE                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |       |                                                                                                                                                                                                                                                                                                            |
| 11.1 | Construction and related activities                                                             | Should, any heritage resources of significance be exposed during the construction of the project, the South African Heritage Resources Authority (SAHRA) should be notified immediately, all development activities should be stopped and an archaeologist accredited with the Association for Southern African Professional Archaeologist (ASAPA) should be notified in order to determine appropriate mitigation measures for the discovered finds. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |

| REF  | PROJECT ACTIVITY                                                                                                            | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                     | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                                             | This may include obtaining the necessary authorisation (permits) from SAHRA to conduct the required mitigation measures.                                                                       |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12.  | VISUAL                                                                                                                      |                                                                                                                                                                                                |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12.1 | Construction activities, dust mobilisation, and construction vehicles traversing the proposed pipeline routes and WRP site. | Provide screening berms along public roads, only where these berms will reduce visual intrusion and are hence justified. These berms will be removed when mining is completed.                 | N/A   | No construction screenings berms were still erected along EWRP infrastructure. No mining activities are taking place on the EWRP site. This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                                                                                                             | Subsequent to backfilling, profile the area to be the same as the original topography.                                                                                                         | C     | No non-compliance observed. The topography around built infrastructure is similar to original the original profiles.                                                                                                                                                                                                                                                                                                                              |
|      |                                                                                                                             | Rehabilitate affected areas as soon as possible.                                                                                                                                               | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                        |
|      |                                                                                                                             | Employ proper “housekeeping” at construction camps/sites.                                                                                                                                      | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                        |
|      |                                                                                                                             | Implement effective dust suppression.                                                                                                                                                          | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                        |
|      |                                                                                                                             | Use selective and judicious lighting for the construction sites, if required                                                                                                                   | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                        |
| 12.2 | Installation of new infrastructure, e.g., pump stations and water balancing/holding facilities.                             | Apply colour variations on the outward surfaces of the infrastructure. Use colours complementary to the colours in the surrounding landscape                                                   | C     | No non-compliance observed. It was noted that infrastructure was colour coordinated to complement the surrounding EWRP environment.                                                                                                                                                                                                                                                                                                               |
|      |                                                                                                                             | Structures will not be reflective.                                                                                                                                                             | C     | No non-compliance noted. No infrastructure was reflective as observed during the audit period. Refer to Appendix B: Photo 1                                                                                                                                                                                                                                                                                                                       |
|      |                                                                                                                             | Where possible, structures should be partially sunken into the landscape.                                                                                                                      | C     | No non-compliance noted. All infrastructure has been secured into the landscape to ensure similar topography profiles are maintained around built infrastructure.                                                                                                                                                                                                                                                                                 |
| 13.  | WETLANDS                                                                                                                    |                                                                                                                                                                                                |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13.1 | Pipeline / watercourse crossings.                                                                                           | At Site WC12, install the pipeline to the southern side of pan, or on the southern side of the existing pipeline running through the pan, as this area has already been heavily impacted upon. | N/C   | The wetland report and master layout plan indicating the watercourses transgressed for Phase 1 and 2 were not verified during the audit period. The auditor could not correlate pipeline condition parameters with google earth imagery for sites.                                                                                                                                                                                                |
|      |                                                                                                                             | Ensure that the pipeline is not buried in wetland areas. Pipelines will be raised onto pylons above the wetland to avoid impacts from soil handling,                                           | N/C   | Pipelines observed were buried and pipelines near wetland areas were not raised using minimal number of pylons. Additionally, the wetland report and master layout plan indicating the watercourses transgressed for                                                                                                                                                                                                                              |

| REF  | PROJECT ACTIVITY                  | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                    | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                   | and the shallow ground water flow regime in such areas. Pylons are to be placed strategically before and after the wetland, if possible, minimal number of pylons are to be constructed in the wetland areas. |       | Phase 1 and 2 were not verified during the audit period. The auditor could not correlate that this pipeline condition parameters with google earth imagery for sites.                                                                                                                                                                                                                                            |
|      |                                   | If a road is to be built in future below the wastewater works at Site WC6 (RR1), then the proposed pipeline should be constructed along the road servitude                                                    | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; and the WC6 road was never constructed according to the external audit by Geovicon, dated March 2022. Therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|      |                                   | Construct pipeline / watercourse crossings in stages so as to limit the impact to the sites, and during the dry season.                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Avoid dumping of construction materials and spoils within the wetlands.                                                                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Implement rehabilitation where negative habitat impacts have occurred and are likely to occur in future.                                                                                                      | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Revegetate bare areas and remove exotic vegetation.                                                                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Clean up and rehabilitate any accidental spillages or impacts to the aquatic and wetland ecosystems.                                                                                                          | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Devise and implement a relocation plan if rare and sensitive species are identified during construction.                                                                                                      | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
| 13.2 | Pipeline / watercourse crossings. | Allow for ample flow through of water should additional culverts be constructed.                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
| 13.3 | Pipeline / watercourse crossings. | Keep construction activities and heavy vehicles out of the wetland areas, where possible. Limit movement of construction vehicles within wetlands. Restrict vehicles to service roads.                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |
|      |                                   | Care must be taken to limit construction activities in small wetland areas adjacent to the conveyor belt to the demarcated 15 m servitude.                                                                    | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                       |

| REF  | PROJECT ACTIVITY                       | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                      | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                |
|------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                        | Implement dust suppression on dirt roads during construction to avoid excessive dust formation.                                                                                                                                                                                                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                        | Maintain service roads to avoid erosion and excessive dust formation.                                                                                                                                                                                                                                                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
| 13.4 | Pipeline / watercourse crossings.      | Where wetland soils have been compacted, labourers should loosen soils with light weight tools.                                                                                                                                                                                                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                        | Wetland soil stripping should only be undertaken during the dry winter months to avoid clotting and compaction of wetland soils.                                                                                                                                                                                                                                                                                | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
| 14   | SOCIO-ECONOMIC                         |                                                                                                                                                                                                                                                                                                                                                                                                                 |       |                                                                                                                                                                                                                                                                                                             |
| 14.1 | Pipeline construction and WRP upgrade. | Make use of local labour as far as possible and employment recruitment policies should be put in place, in order to maximise employment opportunities.                                                                                                                                                                                                                                                          | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, employment parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
| 14.2 | Pipeline construction.                 | Details of servitudes required should be made available in a clear and transparent manner and arrangements made to compensate landowners for the temporary loss of access. Where possible, pipelines should follow existing servitudes, so as to reduce the need for further land restrictions.                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|      |                                        | Where access to businesses is affected, or parking lots made temporarily unavailable, alternative access and parking should be provided in order to avoid any reduction to business productivity. Where private residential property is affected, care should be taken over any residential infrastructure such as trees, fences and access routes.                                                             | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                        | Compensation assessments should be undertaken by independent registered valuers together with a social scientist and relevant company representative. This team will determine the respective rates, oversee negotiations, and facilitate the distribution process. This should include compensation relating to the replacement of lost assets, lost income or production, and lost access to social services. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|      |                                        | It is considered unlikely that property values will be negatively affected by the pipelines after construction as the pipeline will be buried, but this should be assessed by the valuers where landowners may have this concern and compensation determined accordingly.                                                                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |

| REF  | PROJECT ACTIVITY                                                         | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                |
|------|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                          | Route Refinement 1 along the Kromdraai collection pipeline route should be implemented, as this will follow the existing road servitude south of the Sewage Treatment Plant.                                                                                                                                                                                                                                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|      |                                                                          | Route Refinement 3 of the KwaGuqa Reservoir distribution pipeline should be implemented, as this will reduce negative impacts and potential resettlement for the KwaGuqa x16 informal settlement.                                                                                                                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|      |                                                                          | An alternative route for vehicles will be provided for road users impacted on by construction of the water treatment plant and associated infrastructure.                                                                                                                                                                                                                                                                                                                                                                    | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                                                          | Soil stockpiles from construction activities will not be placed in the road, thereby reducing obstructions in the road.                                                                                                                                                                                                                                                                                                                                                                                                      | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                                                          | Residents' access to their properties will not be impinged upon during peak times.                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
| 14.3 | Increase in construction vehicles accessing the pipeline routes and WRP. | Activities of construction vehicles should be re-routed to avoid schools and busy public centres as far as possible. Activities of construction vehicles should be ceased during the night to reduce noise and disruption. Health and road safety awareness should be administered to schools along with community awareness campaigns of the associated risks of increased heavy duty traffic. All vehicles should be maintained to acceptable safety standards in order to reduce risks to the general public and drivers. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
| 14.4 | Pipeline construction and WRP upgrade.                                   | The construction areas should be clearly demarcated with security tape and signage should be erected to illustrate the dangers of open trenches etc. Awareness campaigns should be conducted by distributing pamphlets on the health and safety aspects to all community members and land owners.                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                                                          | All fences damaged by the mine during construction will be repaired.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                                                          | All driveways and gardens impacted during construction of the treatment plant and associated infrastructure will be repaired and rehabilitated.                                                                                                                                                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |
|      |                                                                          | All roads impacted on by construction and rehabilitation will be repaired and reinstated, including farm roads.                                                                                                                                                                                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023  |

| REF                      | PROJECT ACTIVITY                                                                                                                                                                                     | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                   | COMPL                                                | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          |                                                                                                                                                                                                      | Appropriate signage to warn road users of construction activities will be used.                                                                                                                                                                                                                                              | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
|                          |                                                                                                                                                                                                      | Construction will be planned to ensure that all individuals impacted are notified one week prior to construction activities.                                                                                                                                                                                                 | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
|                          |                                                                                                                                                                                                      | Pedestrians will be monitored to ensure that children are not injured at any of the mines construction sites.                                                                                                                                                                                                                | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this auditThungela (EWRP) Environmental External Audit Report 2022/ 2023 period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 |
|                          |                                                                                                                                                                                                      | The construction teams should wear reflective clothing with identification cards and should undergo training in terms of protocols in dealing with the public, especially in terms of the correct procedure for handling the public (adults and children) that may be inquisitive and may not adhere to the safety warnings. | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
|                          |                                                                                                                                                                                                      | Cognisance is taken of the Mine Health and Safety Act and Occupational Health and Safety Act for all construction activities.                                                                                                                                                                                                | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
| 14.5                     | Influx of jobseekers along the proposed pipeline routes and at the WRP.                                                                                                                              | Employment procedures and policies should be made available in a clear and transparent manner.                                                                                                                                                                                                                               | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
|                          |                                                                                                                                                                                                      | Construction workers will not be housed on the construction site and will be resident from nearby communities.                                                                                                                                                                                                               | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
|                          |                                                                                                                                                                                                      | No persons are to be accommodated on site, with the exception of 1 security person at the construction lay-down area.                                                                                                                                                                                                        | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
| 14.6                     | Pipeline construction and operation.                                                                                                                                                                 | Route Refinements 2 and 4 should be implemented to re-align the pipeline routes, so as not to restrict the planned residential and mine infrastructure development.                                                                                                                                                          | N/A                                                  | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                               |
| <b>OPERATIONAL PHASE</b> |                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                              |                                                      |                                                                                                                                                                                                                                                                                                                                                                          |
| 1.1                      | The stockpiling of material on surface will alter surface topography. Settling is expected to occur over the areas where the buried pipelines have been laid. Compaction is also expected over areas | See 2.1 Construction Phase EMP                                                                                                                                                                                                                                                                                               | Compliance for condition 2.1 Construction EMP refers | Condition 2.1 Construction EMP refers                                                                                                                                                                                                                                                                                                                                    |

| REF | PROJECT ACTIVITY                                     | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                          | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | where vehicles and plant equipment travel regularly. |                                                                                                                                                     |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2.1 | Soil contamination and erosion.                      | The collection pipelines should be commissioned to check for leakages and repaired, if necessary, before backfilling of the trenches takes place.   | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed; therefore, condition parameters herein are not applicable during this audit period.                                                                                                                                                                                                                                                                                           |
|     |                                                      | Erosion should be monitored and stabilised as soon as possible, wherever it occurs.                                                                 | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                                                 |
|     |                                                      | Pipelines should be monitored for leaks and spills.                                                                                                 | C     | Monitoring activities for pipeline leaks and spills are undertaken as part of site maintenance. However, no leaks or spills that may lead to erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                        |
|     |                                                      | Repair damaged pipes immediately to avoid excessive spills.                                                                                         | C     | No damaged pipes and/or evidence of excessive spills were observed during the audit period. Pipeline monitoring activities are undertaken as part of site maintenance. However, no excessive spills that will result in erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                             |
|     |                                                      | Should pipeline spillages occur, contain, clean up and rehabilitate immediately.                                                                    | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no spillages were observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                                              |
|     |                                                      | Ensure that any release or spills from scour valves are contained and not released into the environment.                                            | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. Areas with scour valves are bunded and should any release occur, the EWRP dirty and clean site parameters are designed to first divert releases to the environmental sump before release into the environment at designated discharge points.<br>Refer to Appendix B: Photo 16                                                                                                         |
| 2.2 | Soil erosion.                                        | The distribution pipelines should be commissioned to check for leakages and repaired, if necessary, before backfilling of the trenches takes place. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 construction activities have been completed and are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023                                                                                                                                                                                                                         |
|     |                                                      | Erosion should be monitored and stabilised as soon as possible, wherever it occurs.                                                                 | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                                                 |
|     |                                                      | Pipelines should be monitored for leaks and spills.                                                                                                 | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. Additionally, EWRP undertake online monitoring through the SCADA system that can detect faults of flow meters and pressure transmitters.<br>Refer to Appendix B: Photo 2 |
|     |                                                      | Repair damaged pipes immediately to avoid excessive spills.                                                                                         | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure immediate repair.                                                                                                                                                                                                                          |

| REF | PROJECT ACTIVITY                                                                                                                                                                         | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                      | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                                                                                          | In the event that any release or spills from scour valves are released into the environment, erosion control measures should be implemented.                                                                                    | C     | Areas with scour valves are bunded and should any release occur, the EWRP dirty and clean site parameters are designed to first divert releases to the environmental sump before release into the environment at designated discharge points.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|     |                                                                                                                                                                                          | Inspect areas where pipelines go up/down a slope for washout after a heavy rain event.                                                                                                                                          | C     | Monitoring activities of pipelines is undertaken as part of site maintenance. However, should erosion occur, this would be addressed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2.3 | The additional volume of water could result in erosion if not controlled adequately.                                                                                                     | Gabions/other dispersion methods should be installed at the discharge point to the Naauwpoortspruit to ensure that stream flow velocities are not significantly increased to such an extent that erosion may occur.             | C     | No non-compliance observed during the audit period. Velocity reduction measures are in place prior to discharge i.e., mini gabions (rock and geotextile lined with evidence of established vegetation growth) were noted onsite at stormwater control points.<br>Refer to Appendix B: Photo 12                                                                                                                                                                                                                                                                                                                                                                                |
| 2.4 | Soil contamination and erosion.                                                                                                                                                          | Measure to prevent soil contamination by hydrocarbons must be implemented, should any soil become contaminated by hydrocarbons this soil is to be removed to licensed landfill sites using a registered waste disposal company. | C     | EWRP implements a waste management procedure ( Doc No' SS-WTP-PRO-1502), and agreements are in place for a third-party collection and disposal of general (Phola Landfill) and hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021). Proof of safe disposal slips for hazardous waste were verified in the stamped waste manifest (June 2022 to March 2023). Depending on the nature of the spill, Spill kits observed onsite may be used inline with the Spill Kit Procedure, Doc No' SS-WTP-PRO-1417, Approved 02/11/2022; and/or or a hazardous waste sub-contractor comes to collect the waste. |
| 2.5 | Thinly grassed areas (e.g. downhill from sludge stockpile) maybe impacted in the event of a sludge spill from stockpile. This would result in soil contamination and vegetation distress | Stockpiles are must be suitably bunded to contain material.                                                                                                                                                                     | C     | No non- compliance observed during the audit period. Sludge stockpile is temporarily retained in the designated storage area for collection by a 3rd party buyer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.6 | Topsoil erosion                                                                                                                                                                          | Erosion on the unsurfaced / unvegetated areas of site should be regularly monitored                                                                                                                                             | C     | Monitoring activities are undertaken as part of site maintenance. However, should erosion occur, this would be addressed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     |                                                                                                                                                                                          | If erosion is observed, this should be stabilised as soon as possible. Erosion prevention surfacing should be provided in such areas (e.g. vegetation, tar, or brick block paving as appropriate for use)                       | C     | Monitoring activities is undertaken as part of site maintenance. However, should erosion occur, this would be addressed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.1 | Vegetation disturbance                                                                                                                                                                   | Vehicles must stay on demarcated roads and parking areas to avoid unnecessary damage to areas of natural vegetation.                                                                                                            | C     | No non-compliance observed. Vehicles adhered to road rules on site and used demarcated roads and parking areas. No damage to natural vegetation was noted along roads.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|     |                                                                                                                                                                                          | An ongoing alien invasive control programme is required for the duration of the project.                                                                                                                                        | N/C   | Alien invasive establishment was observed during the audit period around EWRP (minor infestation around the environmental sump and gabions; major infestations around the skip designated area). EWRP has an alien invasive programme in place, however the document was not verified during the audit period.<br>Refer to Appendix B: Photo 7 and 13                                                                                                                                                                                                                                                                                                                         |
|     |                                                                                                                                                                                          | Haul roads should be maintained and any spillage of cargo must be removed as soon as possible from the roadside.                                                                                                                | N/A   | No haul roads were observed at EWRP, however existing roads were well maintained. This condition is considered not applicable for this audit period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| REF | PROJECT ACTIVITY                                                                            | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                          | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 4.1 | Impacts on water quality, aquatic biota and macro-channel, riparian and in-stream habitats. | Monitor the pipelines for leaks and spills on a regular basis.                                                                                                                                                                                                      | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon. Refer to Appendix B: Photo 2                                                                                                                                                                                                                                                                                                                                                                                              |
|     |                                                                                             | Repair damaged pipes immediately to avoid excessive spills.                                                                                                                                                                                                         | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     |                                                                                             | Should pipeline spillages occur, contain spills, clean up and rehabilitate immediately.                                                                                                                                                                             | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any problems that arise should be addressed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     |                                                                                             | Implement corrective mitigation measures should any significant decrease in ecological integrity occur (both aquatic and wetland) (as indicated through implementation of the biomonitoring programme) as a result of impacts associated with the proposed project. | C     | EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. The biomonitoring 2022 dry season report (Digby Wells) noted a class IV toxicity for the Noupoot upstream monitoring site, and it was recommended that further investigations be undertaken as possibility of upstream pollution source may be at play. An action plan was put in place and corrective mitigation measures were verified.                                                                                                                                                                                                                                                                                      |
|     |                                                                                             | At pump station and water holding facility sites, a suitable storm water and emergency management plan should be in place.                                                                                                                                          | N/C   | Storm water on site is managed through v-drains, directing run-off water to the environmental sump or Noupootspruit. pollutant-contaminated water is directed to the sump, retreated, and pumped back into the EWRP processes. The Emergency Preparedness Procedure is in plan, Doc No' SS-WTPPRO-1611, Approved 11 November 2022 (as verified). The storm water management plan valid for the audit period was not verified. The Stormwater Management Plan, Doc No' SS-WTP-PRO-1685 provided upon report finalisation, has an implementation date outside of the audit period (05/09/2023) and thus compliance will be assigned in the next audit.                                                                                                                                                                                                                                            |
|     |                                                                                             | At the upgraded WRP, a suitable storm water management plan should be in place                                                                                                                                                                                      | N/C   | Storm water on site is managed through v-drains, directing run-off water to the environmental sump or Noupootspruit. pollutant-contaminated water is directed to the sump, retreated, and pumped back into the EWRP processes. The storm water management plan valid for the audit period was not verified. The Stormwater Management Plan, Doc No' SS-WTP-PRO-1685 provided upon report finalisation, has an implementation date outside of the audit period (05/09/2023) and thus compliance will be assigned in the next audit.                                                                                                                                                                                                                                                                                                                                                              |
|     |                                                                                             | At the upgraded WRP, ensure correct storage and disposal of chemicals, wastes and effluents associated with the plant, as per current practice.                                                                                                                     | N/C   | All respective storage and handling areas is undertaken on clearly demarcated impervious, bunded areas. Verified onsite by the refuelling area (fuel was stored in mobile diesel bowsers and or trailers); Chlorination area (Hydrochloric Acid and Sodium Hydroxide); Lime handling area. EWRP implements a waste management procedure and agreements are in place for a third-party collection and disposal of general (Phola Landfill) and hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021). However, waste storage outside of skips was observed. Waste material was shielded by colour coded net. This is a repeat finding as per the previous external report (dated 2022 and no action plan was verified. Separation of waste streams in respective bins is not being implemented fully as a hazardous bin |

| REF | PROJECT ACTIVITY                                                                                              | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                         | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|     |                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |       | contained both general and hazardous waste contradictory to the waste management procedure (Do No' SS-WTP-PRO-1502).<br>Refer to Appendix B: Photo 6-15.                                                                                                                                                                                                                                                                                                                                                       |
|     |                                                                                                               | At the upgraded WRP, in the event of an emergency, no discharge of any contaminated water into the receiving water environment should take place. Contaminated water should be stored in the mine water storage dams at the WRP during such an event. If necessary, all pumping of contaminated water should be stopped, until the emergency is rectified. Implementation of site rehabilitation should be initiated immediately should any impacts on the Naauwpoortspruit occur. | C     | An environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416, dated 09 March 2023). It was noted from the EWRP personnel that pumping of contaminated water is immediately stopped, until the emergency is rectified. EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. |
| 5.2 | Erosion of discharge point as well as the downstream channel would increase.                                  | Discharge from the WRP into the Naauwpoortspruit should not be directly into the stream, but routed through a velocity reduction mechanism, such as a temporary storage dam. The discharge point should also have erosion reduction structures such as gabion baskets.                                                                                                                                                                                                             | C     | No non-compliance observed during the audit period with regards to erosion at discharge points. Velocity reduction measures are in place prior to discharge and include: A V-trench that opens into an infiltration trench/ canal that is backfilled with mini gabions (rock and geotextile lined with evidence of established vegetation growth). No erosion was noted at discharge points.<br>Refer to Appendix B: Photo 13                                                                                  |
|     |                                                                                                               | The WRP should not make the full discharge of 50 Ml/d into the stream unless the flow downstream at weir B1H019 is less than 1.55 m3/s                                                                                                                                                                                                                                                                                                                                             | C     | No such incidents have occurred. EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure discharge condition parameters herein are adhered to. Additionally, ERWP undertake online monitoring through the SCADA system.<br>Refer to Appendix B: Photo 2                                                            |
|     |                                                                                                               | The total flow in the stream, which includes the natural flow and the discharge, should not exceed 2.16 m3/s.                                                                                                                                                                                                                                                                                                                                                                      | C     | No such incidents have occurred. EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate capacity monitoring and maintenance. ERWP undertake online monitoring of through SCADA.<br>Refer to Appendix B: Photo 2                                                                            |
| 5.3 | This will impact on the water quality of soil profile and local streams in which the seepage will daylight.   | A leakage detection system and routine pipeline inspections should be undertaken.                                                                                                                                                                                                                                                                                                                                                                                                  | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance as per the SAP functional locations database for WTP monitoring points.                                                                                                                   |
| 5.4 | This will cause local erosion and impact on the water quality of the immediate environment and local streams. | Bursts should be repaired immediately as part of the pipeline maintenance schedule.                                                                                                                                                                                                                                                                                                                                                                                                | C     | Monitoring activities for actual or potential erosion sites are undertaken as part of site maintenance. However, no erosion was observed during this audit period and any burst problems that arise should be addressed immediately.                                                                                                                                                                                                                                                                           |
|     |                                                                                                               | Sufficient valves should be in place along the pipeline to isolate the burst as quickly as possible.                                                                                                                                                                                                                                                                                                                                                                               | C     | Sufficient valves are located along the pipeline as verified in the SAPS functional location Database (Ref: V11, undated) to manage burst incidents.                                                                                                                                                                                                                                                                                                                                                           |
|     |                                                                                                               | Remediation protocols should be developed to remediate an area after a burst or where extensive leaks or scour spills have occurred.                                                                                                                                                                                                                                                                                                                                               | C     | An environmental incidents and complaints procedure is in place (Ref: SS-WTP-PRO-1416, dated 09 March 2023) that allows for remediation of environmental incidents as per the condition paramters herein.                                                                                                                                                                                                                                                                                                      |

| REF | PROJECT ACTIVITY                                                                                                                 | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                         | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 5.5 | This will impact on the water quality of the immediate environment.                                                              | Protocols for scouring the collection pipelines should be developed to prevent spills from entering the river systems                                                                                                                                                                                                                                                                                                                              | C     | The auditors verified a pigging procedure - Komadraai to Schoonhezicht, dated 25 August 2025 in place (as verified) for scouring for spill management.                                                                                                                                                                                                                                                                                              |
| 5.6 | Contamination of surface waters                                                                                                  | Water in the subsurface collection sump must be sampled whenever there is an intention to discharge water into the environment. Water quality must be compared to the standards laid out in "Minimum Requirements for the Monitoring of Water at Waste Management Facilities".<br><br>In the event of an exceedance the water is not to be released and must be collected and disposed of appropriately via a suitable qualified water contractor. | C     | EWRP have a Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023). Subsurface collection sump monitoring according to the "Minimum Requirements for the Monitoring of Water at Waste Management Facilities" was verified in the Thungela Resources Subsurface collection sump Q4 water quality report, dated 11 November 2022). |
| 5.7 | Should affected water runoff not be contained from the Gypsum Stockpile, pollution to the receiving environment can be expected. | Stockpiling only to be undertaken in designated, lined areas                                                                                                                                                                                                                                                                                                                                                                                       | C     | No non- compliance observed during the audit period. Sludge stockpile is temporarily retained in the designated bunded storage area for collection by a 3rd party buyer. The Plant is designed such that all dirty surface water will collect at the environmental sump from where it is re-pumped back into the EWRP process. Only treated clean water is released from the Plant to the nearby Naauwpoortspruit.                                  |
|     |                                                                                                                                  | Implement regular maintenance on the environmental sump to ensure affected water runoff is effectively collected.                                                                                                                                                                                                                                                                                                                                  | C     | EWRP have an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. Auditors observed maintenance contractors clearing the environmental sump canals of any obstructions during the audit to ensure effective water runoff.<br>Refer to Appendix B: Photo 17 and 18                                                      |
| 6.1 | Groundwater quality deterioration and formation of a dewatering cone in the natural aquifer.                                     | Maintain water levels in the pit at a similar level than that of the natural aquifer.                                                                                                                                                                                                                                                                                                                                                              | N/A   | No dewatering and storage are occurring in the pits as verified in Jones and Wagner water balance memo, Appendix G, opencast mining in the June 2015 WULA amendment pack. Additionally, no water level monitoring for Pit A and B are being undertaken as verified in the Q4 water quality report, dated 2022). These will be undertaken post-closure. This condition is not applicable for the audit scope/period.                                 |
| 6.2 | Contamination of groundwater                                                                                                     | Water in the subsurface collection sump must be sampled whenever there is an intention to discharge water into the environment. Water quality must be compared to the standards laid out in "Minimum Requirements for the Monitoring of Water at Waste Management Facilities".<br><br>In the event of an exceedance the water is not to be released and must be collected and disposed of appropriately via a suitable qualified water contractor. | C     | EWRP have a Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023). Subsurface collection was verified in the Thungela Resources Subsurface collection sump Q4 water quality report, dated 11 November 2022).                                                                                                                    |
| 6.3 | Both dams are lined, however in the event of a breach this could lead to groundwater quality deterioration                       | Maintain an emergency procedure plan for dealing with leaks greater than the Acceptable Leakage Rate (ALR). Review annually.                                                                                                                                                                                                                                                                                                                       | C     | An environmental emergency plan (Doc No' SS-WTPPRO - 1611) is in place and reviewed annually (approved 11 November 2022) that address leak parameters of the condition herein. Additionally, the Acceptable leakage rate is monitored through SCADA. EWRP have a Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023).         |
|     |                                                                                                                                  | In the event of a leak above the ALR, notify the DWS within 7 days, and submit a preliminary written assessment within 14 days (include volume of leakage, likely sources of leakage, and short-term actions taken and planned.                                                                                                                                                                                                                    | C     | No leak incidents that exceed the ALR occurred during the audit period that warranted DWS notification and submission of a preliminary written assessment. An environmental emergency plan (Doc No' SS-WTPPRO - 1611) is in place and reviewed annually (approved 11 November 2022) that address leak parameters of the condition herein. Additionally, the Acceptable leakage rate is monitored through SCADA.                                     |

| REF | PROJECT ACTIVITY                  | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|     |                                   | Continue to follow the process as laid out in the Emergency Plan, in regular consultation with DWS.                                                                                                                                                                                                                                                                                       |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|     |                                   | One groundwater monitoring borehole is installed in order to detect leaks from both the brine dam and feedwater dam. Water sampling will be carried out from all boreholes at an interval of every three months (i.e. quarterly).                                                                                                                                                         | C     | No non-compliance observed. Pit A is installed as per condition parameters and the quality water monitoring is being undertaken quarterly as verified in the Q4 water quality report, dated 2022).                                                                                                                                                                                                                                                                                                                                                                                   |
|     |                                   | Surface water samples are to be collected from the surface water points and analysed, as stipulated in the WUL (Ref: 04/B11G/ACFGI/1853).                                                                                                                                                                                                                                                 | C     | No non-compliance observed. Surface water sampling occurs as per condition parameters and the quality water analysed as peris being undertaken quarterly as verified in the Q4 water quality report, dated 2022).                                                                                                                                                                                                                                                                                                                                                                    |
|     |                                   | In the event of any exceedances of the standards stipulated, immediate investigation of the facility must be undertaken. In the event that significant contamination is identified, regulation as stipulated in Part 8 of the NEM:WA must be followed.                                                                                                                                    | C     | The Water Quality reports (DWQ Q2 and Q4, dated 2022) and the Blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply with the ALR and latest SANS 241 drinking water quality standards and blue drop standard (> 90% microbiology, chemical parameters) respectively. Outflow and distribution failure were noted for November and December 2022 that led to ALR exceedances for drinking water, but these were classified as insignificant and did not trigger a DWS reporting procedure.                                      |
|     |                                   | All boreholes must be equipped with lockable caps, and any damage repaired timeously.                                                                                                                                                                                                                                                                                                     | N/A   | No boreholes were audited during the audit period and the condition parameters could not be verified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|     |                                   | Regularly inspect visible sections of lining for damage / liner wind lift, wet/saturated surfaces, signs of settlement, signs of cracks etc.<br>Check the leakage collection sumps for evidence of leaks/leachate.                                                                                                                                                                        | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance.                                                                                                                                                                                                                                                                |
|     |                                   | Regularly clean and maintain the leakage collection system, pumps and sumps to ensure capacity and efficacy. Remove salts from brine dam system.<br>Manholes to be fitted with an alarm system that can be monitored from the WTP in the event of a detection of a rise of sub-surface level, or leakage detection.<br>All wastes must be appropriately managed, and disposed of offsite. | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. The level transducers, leachate and submersive pumps and manhole alarms SAP monitoring points were verified on the SCADA for WTP monitoring points. Wastes are appropriately managed and disposed of offsite by offsite as per the waste management procedure. |
|     |                                   | Remove tree roots if impacting liner, and fill with compacted soil and re-seed area.                                                                                                                                                                                                                                                                                                      | C     | Monitoring activities of the liner are undertaken as part of site maintenance. EWRP reseed with an approved Thungela seed mix                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6.4 | Groundwater quality deterioration | Maintain emergency procedures for in the event of an overflow. Review the process annually.                                                                                                                                                                                                                                                                                               | C     | An environmental emergency plan (Doc No' SS-WTPPRO - 1611) is in place and reviewed annually (approved 11 November 2022) that address overflow parameters of the condition herein. Additionally, the overflow is monitored through SCADA and physical periodical inspections. EWRP have a Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) to manage groundwater monitoring.                                                                                |
|     |                                   | Inspect to ensure a minimum freeboard of 1.2m is being maintained. Record the liquid level of the pond.                                                                                                                                                                                                                                                                                   | C     | A freeboard of 0.8 m is maintained with online and visual level monitoring (verified in the water quality monitoring procedure, ref: 6820-000-S29-0265.04). Record levels were well maintained for the audit period with minor exceedances of freeboard between May and June 22 as verified during the audit period (Brine dam levels 2022 – 2023).                                                                                                                                                                                                                                  |

| REF | PROJECT ACTIVITY                      | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                  | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|     |                                       | Inspect to ensure that all pipelines are intact.                                                                                                                                                                                                                                                                                                            | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP undertake online monitoring of flow meters and pressure transmitters.                                                                                                  |
|     |                                       | Ensure ditches are free of obstructions, culverts are open and free of solid material, drainage is not impeded, runoff is being directed to the intended areas, and that there is no evidence of severe erosion to the ditches or culvert headwalls and evidence of overflow from the ditches.                                                              | C     | EWRP have an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. Auditors observed maintenance contractors clearing culverts of any obstructions during the audit. Refer to Appendix B: Photo 17 and 18                                                                                                                                                             |
|     |                                       | Ensure fences are in good condition, gates are functional and closed when not in use, locks are in working order, and perimeter warning signs are properly placed and in good condition.                                                                                                                                                                    | C     | No non-compliance observed. All fences observed were in good condition, gates were functional and locks evident. All perimeter warning signs were appropriately placed and in good condition. Refer to Appendix B: Photo 1, 4 AND 5.                                                                                                                                                                                                                                                              |
|     |                                       | Ensure proper functioning of level transducers and pumps at the subsurface water and leakage and leachate collection sumps and submersible pumps. Manholes to be fitted with an alarm system that can be monitored from the WTP in the event of a detection of a rise of sub-surface level, or leakage detection.                                           | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. The level transducers, leachate and submersive pumps and manhole alarms SAP monitoring points were verified on the SCADA for WTP monitoring points.                         |
|     |                                       | Ensure the completion of routine/preventative and 'as required' maintenance is completed in a timeous manner. Maintain auditable maintenance logs.                                                                                                                                                                                                          | C     | No non-compliance observed. Auditable maintenance logs were verified (operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022).                                                                                                                                                                                                                                                                                                                                   |
|     |                                       | In the event of a breach that impacts surface or groundwater, notify the DWS within 7 days, and submit a preliminary written assessment within 14 days (include volume of breach, likely causes of breach, and short-term actions taken and planned.<br>Continue to follow the process as laid out in the Emergency Plan, in regular consultation with DWS. | C     | No significant impacts were observed on groundwater that warranted DWS notification and submission of a preliminary written assessment. The Water Quality reports (DWQ Q2 and Q4, dated 2022) and the Blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply. An environmental emergency plan (Doc No' SS-WTPPRO - 1611) is in place and reviewed annually (approved 11 November 2022) that address leak parameters of the condition herein. |
| 6.5 | Groundwater quality deterioration     | Ensure that all hard standings, joints, and seals are regularly inspected and maintained as required in order to ensure that the integrity of the impermeable surface is maintained.                                                                                                                                                                        | C     | It was verified during the audit that that a structural inspection of EWRP is updated every three (3) years (dated 2020 by Semane). The 2023 report will be verified in the next audit period.                                                                                                                                                                                                                                                                                                    |
|     |                                       | The stormwater management plan must be adhered to, to ensure that clean water is safely diverted around the site and that dirty water is contained and correctly handled.                                                                                                                                                                                   | N/C   | The storm water management plan valid for the audit period was not verified. The Stormwater Management Plan, Doc No' SS-WTP-PRO-1685 provided upon report finalisation, has an implementation date outside of the audit period (05/09/2023) and thus compliance will be assigned in the next audit.                                                                                                                                                                                               |
|     |                                       | Ensure that any spills occurring on site are suitably managed to reduce potential impacts on the environment                                                                                                                                                                                                                                                | C     | No significant impacts were observed on groundwater as verified in the Water Quality reports (DWQ Q2 and Q4, dated 2022) and the Blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply.                                                                                                                                                                                                                                                     |
| 7.1 | Particulate matter or dust pollution. | If possible, undertake handling activities in covered areas.                                                                                                                                                                                                                                                                                                | C     | No particulate matter or dust pollution was visible to auditors during the site assessment. Lime handling activities are undertaken in an open bunded area.                                                                                                                                                                                                                                                                                                                                       |

| REF | PROJECT ACTIVITY                  | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                  | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|     | .                                 | Implement adequate dust suppression measures.                                               | C     | No particulate matter or dust pollution was visible to auditors during the site assessment. Generation of dust pollution is limited as wet brine, gypsum and lime are handled.                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8.1 | Increased ambient noise levels.   | Pipelines must be operated within their design and safety limits.                           | C     | Pipelines are operated within design parameters. Noise monitoring data to ensure ambient noise levels are undertaken at EWRP was verified during the audit period (Occupational hygiene report by VentGiene dated February 2023, ref: HOH2/WRTP/0223)..                                                                                                                                                                                                                                                                                                                                    |
| 8.2 | Increased ambient noise levels.   | Ensure systematic maintenance of all equipment, including pump stations.                    | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. The auditors did not observe excessive noise from infrastructure, Noise monitoring data to ensure ambient noise levels are undertaken EWRP was verified during the audit period (Occupational hygiene report by VentGiene dated February 2023, ref: HOH2/WRTP/0223). |
| 9.1 | Inundation and flow obstruction.  | Repair damaged scour valves and pipes immediately to avoid excessive spills.                | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance.                                                                                                                                                                                                                                                                      |
|     |                                   | Monitor the pipelines for leaks and spills on a regular basis.                              | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP undertake online monitoring of flow meters and pressure transmitters and any incidents are recorded on Enablon.                                                                                                                                                 |
| 9.2 | Eroding of wetlands.              | Repair damaged scour valves and pipes immediately to avoid excessive spills.                | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance.                                                                                                                                                                                                                                                                      |
| 9.3 | Degradation of wetland integrity. | Prevent pipeline and scour valve spillages.                                                 | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance.                                                                                                                                                                                                                                                                      |
|     | .                                 | Should any pipeline and scour valve spillages occur, clean up and rehabilitate immediately. | C     | EWRP implement corrective mitigation measures should spillages occur that results in any significant decrease in ecological integrity that is monitored through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023).                                                                                                                                                                                                                                             |
|     |                                   | Contain any spills to avoid degrading downstream water quality.                             | C     | EWRP implements a water management plan through the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012). A water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) is in place. The Water Quality reports (Q2 and Q4, dated 2022) and the Blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply with the latest SANS 241 drinking water quality standards and blue drop standard (> 90% microbiology, chemical parameters) respectively.                                     |

| REF                    | PROJECT ACTIVITY                                                                                                                              | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                          | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 10.1                   | Creation of employment opportunities.                                                                                                         | Where possible, use local labour.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | C     | Thungela have employment and EWRP policies in place that maximise local employment opportunities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                        |                                                                                                                                               | Employment recruitment policies should be put in place, in order to maximise employment opportunities.                                                                                                                                                                                                                                                                                                                                                                                              | C     | No noncompliance observed. Employment recruitment policies in place that maximise employment opportunities at EWRP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10.2                   | Augmentation of local potable water supply.                                                                                                   | Regular monitoring of the treated water and the WRP should be undertaken in order to ensure the quality of the treated water supply to communities and to address the current problems of water standards, thereby maximising the potential benefits of the expansion scheme.                                                                                                                                                                                                                       | C     | No non-compliance observed during the audit period. EWRP implements a water management plan through the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012). A water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) is in place. The Water Quality reports (Q2 and Q4, dated 2022) and the Blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply with the latest SANS 241 drinking water quality standards and blue drop standard (> 90% microbiology, chemical parameters) respectively. Non-conformances because of outflow and distribution failure were noted for November and December 2022. |
| 10.3                   | Impacts on health and safety of local communities / residents / affected landowners                                                           | Implement a community awareness campaign. The purpose of this campaign should be to create awareness among the local communities / residents / affected landowners of the potential risks associated with the pipelines. The campaign could include the distribution of pamphlets, talks at local schools, road shows, etc. Signage could also be erected at various points along the pipelines to illustrate the dangers of the contents of the pipelines (particularly the collection pipelines). | N/C   | Awareness campaigns are limited to the employees and visitors of EWRP. However, no community awareness campaign material was verified during the audit period outside EWRP i.e., road shows, signage erected at various points along the pipelines to illustrate the dangers of the contents of the pipelines (particularly the collection pipelines with AMD).<br><br>Refer to Appendix B: Photo 5 and 11                                                                                                                                                                                                                                                                                                         |
|                        | Cognisance must be taken of the Mine Health and Safety Act and Occupational Health and Safety Act                                             | Cognisance must be taken of the Mine Health and Safety Act and Occupational Health and Safety Act                                                                                                                                                                                                                                                                                                                                                                                                   | C     | No non-compliance observed. EWRP operations are in line with Mine Health and or/ Occupational Safety Act.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 11.1                   | Negative impacts on community members (leading to complaints)                                                                                 | The following documentation must be kept onsite in order to record compliance with the EMP: Record of complaints; and Record of emergencies and incidents.                                                                                                                                                                                                                                                                                                                                          | C     | EWRP has an Environmental Incidents and Complaints Procedure, Document No. SS-WTP-PRO-1416 to deal with issues resulting in an environmental complaint from residents, government bodies, neighbouring farmers, or any other interested and affected parties. Complaints registers are located at Security Checkpoint 1 (visitors' entrance) and the Plant Control Room. Complaints can also be lodged by contacting the SHE Officer.                                                                                                                                                                                                                                                                              |
| <b>DECOMMISSIONING</b> |                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.1                    | The temporary stockpiling, compaction of in situ material, excavation, mixing, and replacement of excavated material during pipeline removal. | See 2.1 Construction Phase EMP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2.1                    | Reclamation of the collection and distribution pipelines.                                                                                     | The collection pipeline system should be flushed with clean water before reclamation commences.                                                                                                                                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2.2                    | Reclamation of the collection and distribution pipelines.                                                                                     | Should the aim be to reclaim the collection pipelines upon decommissioning, the pipelines should be constructed above ground.                                                                                                                                                                                                                                                                                                                                                                       | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                     |

| REF | PROJECT ACTIVITY                                                                                                                               | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                          | COMPL                               | OBSERVATIONS                                                                                                                                                                                                                                                                                                   |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                                                | See 3.1-3.5 Construction Phase EMP.                                                                                                 | See 3.1-3.5 Construction Phase EMP. | See 3.1-3.5 Construction Phase EMP.                                                                                                                                                                                                                                                                            |
| 3.1 | Excavating pipeline trenches, should the aim be to reclaim the collection and distribution pipelines upon decommissioning.                     | A mutually acceptable agreement must be drawn up with landowners to compensate them in the event of crop loss and servitude rights. | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
|     |                                                                                                                                                | See 3.1-3.2 above.                                                                                                                  | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 4.1 | Vegetation clearing and stripping of topsoil during pipeline, etc decommissioning/reclamation.                                                 | See 5.1 Construction EMP                                                                                                            | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 4.2 | Presence of machinery and human activities.                                                                                                    | See 5.2 Construction EMP                                                                                                            | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 4.3 | Vegetation clearing and stripping of topsoil during pipeline, etc decommissioning/reclamation.                                                 | See 5.3 Construction EMP                                                                                                            | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 5.1 | Reclamation of pipeline/watercourse crossings.                                                                                                 | See 6.1 Construction EMP                                                                                                            | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 6.1 | Reclamation of the collection and distribution pipelines.                                                                                      | See 7.1 Construction Phase EMP                                                                                                      | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 7.1 | Accidental spillage of oil or other hydrocarbons and pollutants along the proposed pipeline routes and within the decommissioning sites/camps. | See 8.1 Construction Phase EMP                                                                                                      | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 8.1 | Vehicles traversing the decommissioning sites; excavating pipeline trenches, should pipelines be reclaimed.                                    | See 9.1 Construction Phase EMP                                                                                                      | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 9.1 | Movement of heavy machinery and vehicle traffic during pipeline and other infrastructure reclamation.                                          | See 10.2 Construction Phase EMP                                                                                                     | N/A                                 | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |

| REF  | PROJECT ACTIVITY                                                                                     | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                              | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                  |
|------|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                      |                                                                                                                                                                                                                                                         |       |                                                                                                                                                                                                                                                                                                               |
| 10.  | Visual                                                                                               | See 10.2 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 10.1 | Reclamation of the collection and distribution pipelines.                                            | See 12.1 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 10.2 | Removal of project infrastructure, such as the pump stations and water balancing/holding facilitates | Rehabilitate affected sites to ensure that they become stabilised and self-sustaining.                                                                                                                                                                  | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 11.  | WETLANDS                                                                                             |                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 11.1 | Pipeline / watercourse crossings.                                                                    | See 13.1 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 11.2 | Pipeline / watercourse crossings.                                                                    | See 13.2 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 11.3 | Pipeline / watercourse crossings.                                                                    | See 13.3 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 11.4 | Pipeline / watercourse crossings.                                                                    | See 13.4 Construction Phase EMP                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 12.  | SOCIO-ECONOMIC                                                                                       |                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| 12.1 | Decommissioning of the WRP, pipelines and other infrastructure.                                      | A programme of retrenchment and re-training should be implemented, providing employees with clear, transparent information on planned activities and closure dates, offering employment at similar sites where possible and full retrenchment packages. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |

| REF  | PROJECT ACTIVITY                                                                                                                              | CONDITIONS_MITIGATION/ MANAGEMENT MEASURES                                                                                                                                                                                                              | COMPL | OBSERVATIONS                                                                                                                                                                                                                                                                                                   |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                                                               | Conduct an analysis of alternative uses for the pipelines to assess future employment opportunities.                                                                                                                                                    |       | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
|      | As necessary, during the Operational Phase                                                                                                    | A programme of retrenchment and re-training should be implemented, providing employees with clear, transparent information on planned activities and closure dates, offering employment at similar sites where possible and full retrenchment packages. | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 12.2 | Decommissioning of the WRP, pipelines and other infrastructure.                                                                               | Conduct an analysis of alternative uses for the pipelines to assess future employment opportunities.                                                                                                                                                    | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 12.3 | Decommissioning of the WRP, pipelines and other infrastructure.                                                                               | Support an assessment to determine the complete management of acid mine drainage in the area, meaning local communities will not experience impacts related to continued pollution and health and safety issues.                                        | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
| 12.4 | Conduct an analysis of possible sustainable community development programmes to be put in place, should the scheme need to be decommissioned. | Conduct an analysis of possible sustainable community development programmes to be put in place, should the scheme need to be decommissioned.                                                                                                           | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.  |
|      |                                                                                                                                               | Support an investigation into alternative sources of water to ensure a continuous, safe supply of water to communities.                                                                                                                                 | N/A   | This condition falls outside this audit scope/period. Phase 1 and 2 activities are in operation phase; therefore, decommissioning parameters stated herein are not applicable during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |

**Table 4: The EWRP's EMPR for the proposed construction of a pipeline from the water treatment plant at Greenside Colliery' to Phola coal plant, approved 28 March 2010 (DEDET Reference No.: 17/2/13NK31).**

| Ref NO'                                               | ACTIVITIES                           | MITIGATION CONDITIONS                                                                                                                                                                                           | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>8.1. ENVIRONMENTAL MANAGEMENT RESPONSIBILITIES</b> |                                      |                                                                                                                                                                                                                 |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                       | The role of the Anglo Coal           | Ensure overall compliance with environmental management plans.                                                                                                                                                  | C     | Bongeka Madolo is the appointed Plant Manager responsible for ensuring compliance with environmental legislation and licenses/permits issued to Thungela for the EWRP. EWRP undertake regular monitoring and auditing to ensure compliance to the EMPr.                                                                                                                                                                                                                                                                                                  |
|                                                       |                                      | Prepare reports on compliance with environmental management plans and other relevant procedures.                                                                                                                | C     | EWRP undertake regular monitoring and auditing to ensure compliance to the EMPr, including: <ul style="list-style-type: none"> <li>External audit Report (EMPr &amp; EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022.</li> <li>DWS 2022 Quarterly Reports (Report No': 26 and 28).</li> </ul>                                                                                                                                                                                                                                          |
|                                                       |                                      | Provide direction and feedback to contractors and site foremen.                                                                                                                                                 | C     | Conditions of this EMPr and associated licences and permit form part of the contractual pack that provide direction for all relevant employees and sub-contractors. All employees and contractors' environmental awareness (verified in the environmental awareness 2023 induction presentation). Feedback on compliance as a result of audit reporting (EMPr & EA) is periodically undertaken with respective contractors.                                                                                                                              |
|                                                       |                                      | Recommend corrective actions and procedures, if necessary.                                                                                                                                                      | C     | Procedures developed by EWRP are in place and are deemed to be appropriately implemented by site personnel as part of the Integrated Management System by site personnel. A number of procedures are in place that allow for corrective actions i.e., environmental incidents and complaints (Ref:SS-WTP-PRO-1416, dated 09 March 2023); Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. |
|                                                       |                                      | Ensure that all reporting is undertaken in accordance with the timing and requirements of environmental management plans.                                                                                       | C     | EWRP undertake regular monitoring and auditing to ensure that all reporting is undertaken in accordance with the timeframes as stipulated in this EMPr. External audit Report (EMPr & EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022, and DWS 2022 Quarterly Reports (Report No': 26 and 28) were submitted to the relevant authorities within the agreed upon timeframes.                                                                                                                                                            |
|                                                       |                                      | Liaise with landowners to ensure that they are informed of progress with the project and any issues related to the site's environmental management.                                                             | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                       |
|                                                       | The role of the building contractors | Provide information to Anglo Coal, as requested, for compliance with the plans.                                                                                                                                 | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. EWRP will implement as and when construction is required. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                             |
|                                                       |                                      | Ensure that all personnel on site have a clear understanding of the environmental requirements relevant to their duties and are briefed on their environmental responsibilities prior to commencement of works. | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. EWRP will implement as and when construction is required. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                             |
|                                                       |                                      | Maintain monitoring records to demonstrate conformance with environmental management plans.                                                                                                                     | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. EWRP will implement as and when construction is required. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                             |

| Ref NO'                                       | ACTIVITIES                            | MITIGATION CONDITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                               |                                       | Provide all necessary assistance during environmental reviews and site inspections and ensure that all corrective actions required and directives to take corrective actions are adhered to.                                                                                                                                                                                                                                                                                                                                                                                      | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. EWRP will implement as and when construction is required. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |
| <b>8.2. ENVIRONMENTAL MANAGEMENT MEASURES</b> |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |       |                                                                                                                                                                                                                                                                                                                              |
|                                               | Soil handling and removal             | Strip (and stockpile if necessary) sufficient usable soil so that areas disturbed by construction can be rehabilitated at closure with no net loss in land capability.                                                                                                                                                                                                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               |                                       | Usable soils should be stripped and stockpiled in a position close to the area that they will be required for their end use.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               |                                       | The subsoils and topsoil should be separated and stockpiled independently of one another but in close proximity, so that there is no mixing of the materials.                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               |                                       | The soils removed along the pipeline route will be replaced in a short period of time, and will only require that the soils horizons are removed, and replaced in sequence (topsoil/subsoil).                                                                                                                                                                                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               |                                       | Usable soils, including topsoil should be removed and the underlying material compacted in situ, and the site kept managed for any potential erosion.                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               |                                       | At closure the affected areas should be ripped to at least 400mm depth, after which the usable soils should be replaced, fertilized and seeded. Effective ripping will be required to achieve at least land of grazing land capability                                                                                                                                                                                                                                                                                                                                            | N/A   | This condition falls outside this audit scope/period as no soil handling and removal associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|                                               | Soil replacement and land preparation | The different soils and profiles should be stripped and stockpiled in separate areas and revegetated as soon as possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period as no soil replacement and handling associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.             |
|                                               |                                       | The stockpiles should be hydro-seeded and fertilized to obtain the vegetative cover needed to effectively control erosion.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N/A   | This condition falls outside this audit scope/period as no soil replacement and handling associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.             |
|                                               |                                       | <p>The trenched pipeline should be re-vegetated as soon as is reasonably possible and managed until the vegetative growth has established by:</p> <ul style="list-style-type: none"> <li>• Ploughing the area using a disc harrow, if required, to obtain a viable planting environment.</li> <li>• Adding fertiliser and manure using a standard industrial spreader, if required (refer to analytical results for nutrient status of material).</li> <li>• Harrowing the area to ensure adequate mixing has occurred before re-seeding with an appropriate seed mix.</li> </ul> | N/A   | This condition falls outside this audit scope/period as no soil replacement and handling associated with construction of pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.             |

| Ref NO' | ACTIVITIES                          | MITIGATION CONDITIONS                                                                                                                                                                                               | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                          |
|---------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         | Maintenance of soil stockpile areas | Livestock should be kept off of newly stockpiled soils until vegetation has re-established on it.                                                                                                                   | N/A   | This condition falls outside this audit scope/period as no maintenance of stockpile areas associated with the pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|         |                                     | Newly seeded/planted areas must be protected against compaction and erosion.                                                                                                                                        | N/A   | This condition falls outside this audit scope/period as no maintenance of stockpile areas associated with the pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|         |                                     | Traffic should be limited where possible while the vegetation is becoming established.                                                                                                                              | N/A   | This condition falls outside this audit scope/period as no maintenance of stockpile areas associated with the pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|         |                                     | If the soils are stripped in their dry state it will not be necessary to plough them. However, if they are stripped when wet then ripping and dicing of the soil stockpiles is recommended prior to seeding them.   | N/A   | This condition falls outside this audit scope/period as no maintenance of stockpile areas associated with the pipeline from the water treatment plant to Phola Coal plant have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|         | Protection of aquatic ecology       | Limiting the duration of impacts to as short a period of time as possible and returning the impacted areas to an ecologically acceptable condition as soon after trenching and pipe removal activities as possible. | N/A   | This condition falls outside this audit scope/period as no trenching and pipe removal activities occurred during the audit period. EWRP have noted this condition for future works. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                            |
|         |                                     | Scheduling construction and decommissioning activities outside of the main summer rainfall season.                                                                                                                  | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. Decommission has not yet occurred. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                 |
|         |                                     | Minimizing the amount of time spent in wetland and water course areas by undertaking works and rehabilitating the areas as fast as possible.                                                                        | N/A   | This condition falls outside this audit scope/period as no maintenance works and rehabilitation within a wetland occurred during the audit period. EWRP have noted this condition for future works. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.            |
|         |                                     | Minimizing the amount of areas of bare soil along the pipeline by progressively rehabilitating areas as the pipeline is laid and again when it is removed during the decommissioning phase.                         | N/A   | This condition falls outside this audit scope/period as no decommissioning work within a wetland occurred during the audit period. EWRP have noted this condition for future works. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                            |
|         |                                     | Erosion control measures such as the use of straw bales along drainage areas should be employed to reduce turbidity and water quality impacts during construction and decommissioning.                              | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed and no decommissioned of pipelines occurred. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.        |
|         |                                     | Areas in which the soils have been compacted, as a result of construction activities, should be disced to reduce compaction and encourage re-vegetation.                                                            | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                    |
|         |                                     | Areas that have been disturbed by activities associated with the installation and removal of the pipeline, should be re-contoured in order to re-establish the original topography.                                 | N/A   | This condition falls outside this audit scope/period as condition parameters were not audited. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                 |
|         |                                     | Existing erosion nick-points, particularly at site G1, should be recontoured and re-vegetated to reduce the risks of erosion.                                                                                       | N/A   | This condition falls outside this audit scope/period as condition parameters were not audited due to lack of access to site. Zibulo Colliery environmental personnel are responsible for managing the pipeline NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. |

| Ref NO' | ACTIVITIES            | MITIGATION CONDITIONS                                                                                                                                                                                  | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|         |                       | The existing V-notch weir at site G1A should be removed and the area rehabilitated to reduce the risks of further erosion.                                                                             | N/A   | This condition falls outside this audit scope/period as condition parameters were not audited due to lack of access to site. Zibulo Colliery environmental personnel are responsible for managing the pipeline NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                      |
|         |                       | During the operation of the pipeline a regular inspection program must be undertaken to ensure that leaking is not a problem and where problems arise, appropriate corrective actions should be taken. | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. ERWP and Zibulo Colliery (mage a section of the pipeline) undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon. |
|         | Vegetation management | The spread of alien invasive vegetation in the vicinity of the pipeline, particularly in the wetlands and watercourse, should be controlled as part of an ongoing maintenance plan.                    | N/C   | Monitoring activities of AIPs infestations along pipeline route are undertaken as part of pipeline maintenance. Any infestations that arise are addressed immediately, however proof of the AIP maintenance plan was not verified during the audit period. The site noted that AIP is an ongoing problem.                                                                                                                                                                                                                  |
|         |                       | Existing alien species that are within the proposed pipeline servitude should be removed and further encroachment should be controlled as part of an ongoing maintenance plan.                         | N/C   | Monitoring activities of AIPs infestations along pipeline route are undertaken as part of pipeline maintenance. Any infestations that further encroach are controlled as part of an ongoing maintenance plan, however this document was not reviewed and AIP was noted to be an ongoing problem.                                                                                                                                                                                                                           |
|         | Traffic               | Minimizing disruptions of traffic flow and ensuring the safety of motorists and construction personnel at the road crossings.                                                                          | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                         |
|         |                       | Minimizing the amount of time spent at the road and rail crossings by undertaking works and rehabilitating the areas as fast as possible.                                                              | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                         |
|         |                       | Preparation and approval of an appropriate procedure for road and rail crossing, approved by the Mpumalanga Roads Department and SPOORNET respectively.                                                | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                         |
|         |                       | The placement of appropriate signage as per the Mpumalanga Roads Department requirements.                                                                                                              | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                         |
|         |                       | Provision of suitable alternative road deviations in an effort to minimise traffic disruptions.                                                                                                        | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                         |
|         | Waste Management      | All waste stored temporarily at the site is suitably contained in such a way that it does not result in pollution of the surrounding environment.                                                      | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed and no waste generating activities have been undertaken. Nonetheless EWRP. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, EWRP implement a waste management procedure (Do No' SS-WTP-PRO-1502).                                                                                            |
|         |                       | All waste is removed from the site and disposed of at an appropriate, licensed facility.                                                                                                               | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed and no waste generating activities have been undertaken. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless,                                                                                                                                                                                    |

| Ref NO' | ACTIVITIES           | MITIGATION CONDITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                   | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|         |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       | EWRP implement a waste management procedure (Do No' SS-WTP-PRO-1502) and agreements are in place for a third-party collection and disposal of general (Phola Landfill) and hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021).                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|         |                      | The development of waste management procedures, incorporated within environmental management plans for all aspects of waste management at the site.                                                                                                                                                                                                                                                                                                     | C     | EWRP implement a waste management procedure (Do No' SS-WTP-PRO-1502) that aligns with the environmental management aspects of waste management at the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|         |                      | Induction and training of personnel at the site in the need for effective waste management and the procedures to be followed.                                                                                                                                                                                                                                                                                                                           | C     | Site specific induction of all EWRP personnel is compulsory and includes environmental awareness (verified in the 2023 site specific environmental induction) that promotes effective waste management and the waste management procedure (Do No' SS-WTP-PRO-1502) to be followed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|         |                      | The use of clearly demarcated and bunded areas for the storage of excavated materials, spoils and construction waste materials.                                                                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed and no waste generating activities have been undertaken. Nonetheless EWRP. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                            |
|         |                      | The use of a system of effectively contained waste management bins and storage areas for refuse generated by personnel on-site.                                                                                                                                                                                                                                                                                                                         | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has been completed and no waste generating activities have been undertaken. Nonetheless EWRP. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                            |
|         | Sanitation           | No pollution of the environment arises as the result of the operation of the sanitary system.                                                                                                                                                                                                                                                                                                                                                           | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has no temporary sanitation facilities have been erected outside of EWRP. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                |
|         |                      | <p>The sanitation system must consider the following issues:</p> <ul style="list-style-type: none"> <li>• The total number of personnel at the site requiring sanitary facilities.</li> <li>• The use of an appropriate, approved system such as chemical toilets.</li> <li>• The use of a licensed service provider that is able to ensure that the effluent generated is appropriately transported and disposed of at a licensed facility.</li> </ul> | N/A   | This condition falls outside this audit scope/period as all construction of pipeline from the water treatment plant to Phola Coal plant has no temporary sanitation facilities have been erected outside of EWRP. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                |
|         | Pipeline Maintenance | No unnecessary pollution of the environment arises as the result of the pipeline's operation.                                                                                                                                                                                                                                                                                                                                                           | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP jointly with Zibulo undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon that may lead to environmental pollution as per the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023. |
|         |                      | The installation of regularly calibrated flow meters at both end of the pipeline to assist in the detection of leaks.                                                                                                                                                                                                                                                                                                                                   | C     | EWRP has installed flow meters on the pipeline (verified in the maintenance certificates, dated 23 July 2022 by Endress Hause) and undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Ref NO' | ACTIVITIES                       | MITIGATION CONDITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|         |                                  | The establishment of an ongoing inspection and maintenance program of the pipeline and its valves.                                                                                                                                                                                                                                                                                                                                                                                                 | C     | Sufficient valves are located along the pipeline as verified in the SAPS functional location Database (Ref: V11, undated) to manage burst incidents. EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP jointly with Zibulo undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon that may lead to environmental pollution as per the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023. |
|         |                                  | The establishment of appropriate maintenance procedures in the event of an incident that leads to damage of the pipeline.                                                                                                                                                                                                                                                                                                                                                                          | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. EWRP jointly with Zibulo undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon that may lead to environmental pollution as per the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023.                                                                                                                                                      |
| 8.3.    | Induction and Training           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|         | Scope of induction and training  | Contractors and site foremen should undergo detailed induction. All other personnel should undergo general induction and training relevant to their area of work.                                                                                                                                                                                                                                                                                                                                  | C     | Site specific induction of all EWRP personnel is compulsory and includes environmental awareness (verified in the 2023 site specific environmental induction) that promotes effective waste management and the waste management procedure (Do No' SS-WTP-PRO-1502) to be followed. All other personal undergo a SHE Visitors Induction (as verified, dated 23 March 2023).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|         |                                  | Copies of the environmental management plans should be made available to the site foremen prior to the commencement of works and for the duration of the construction and decommissioning periods.                                                                                                                                                                                                                                                                                                 | C     | Conditions of this EMPr and associated licences and permit form part of the contractual pack that provide direction for all relevant employees and sub-contractors. All employees and contractors' environmental awareness (verified in the environmental awareness 2023 induction presentation). Feedback on compliance as a result of audit reporting (EMPr & EA) is periodically undertaken with respective contactors. .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8.4.    | Incident Management and Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|         | Incident management requirements | The Anglo Coal environmental control officer and construction contractors are required to identify potential hazards and implement measures to address them. This includes:<br>Establishing designated areas for the safe storage of chemicals, oils and fuels.<br>Establishing incident response procedures for the management of spills of any kind.<br>Identifying potential fire hazards and implementing measures to address them in accordance with Anglo Coal's fire management procedures. | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed and the records of fulfillment of the ECO and construction contractors incident management responsibilities were not retained for audit verification. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Ref NO' | ACTIVITIES        | MITIGATION CONDITIONS                                                                                                                                                                              | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                   | Incident management procedures must specify the equipment that is required on-site to deal with any situations that may arise. Such equipment must be in place prior to the commencement of works. | C     | ERWP jointly with Zibulo undertake online monitoring of flow meters and pressure transmitters (through SCADA) and any incidents that arise are recorded on Enablon that may lead to environmental pollution as per the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023                                                                                                                                                                                |
|         |                   | Individuals that must be contacted during and after working hours, in the event of an incident, are to be identified and contact procedures prepared.                                              | C     | The aforementioned procedures detail individuals that must be contacted during and after working hours, in the event of an incident and names are placed at areas of potential incidents.                                                                                                                                                                                                                                                                                                                                                                                                                       |
|         |                   | A briefing on incident management procedures and training in the use of equipment is to be conducted for relevant personnel at the site.                                                           | C     | Site specific induction of all EWRP personnel is compulsory and includes environmental awareness (verified in the 2023 site specific environmental induction) and includes incident management procedures. ERWP jointly with Zibulo undertake online monitoring of pipelines (through SCADA) and any incidents that arise are recorded on Enablon that may lead to environmental pollution as per the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 |
|         | Incident response | The immediate problem must be assessed and understood to determine options for immediate actions.                                                                                                  | C     | The Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 to manage incidents. Depending on the nature of the spill, Spill kits may be used inline with the Spill Kit Procedure, Doc No' SS-WTP-PRO-1417, Approved 02/11/2022; and/or or a hazardous waste sub-contractor comes to collect the waste which can be used for managing any spills from the pipeline.                                                                                           |
|         |                   | The safety of any personnel should be ensured as a first priority.                                                                                                                                 | C     | The Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 to ensure priority of safety of any personnel.                                                                                                                                                                                                                                                                                                                                                    |
|         |                   | Environmental damage should be quickly minimized. All emergency actions should take place as soon as possible after the event.                                                                     | C     | The Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 to manage environmental emergency incidents.                                                                                                                                                                                                                                                                                                                                                      |
|         |                   | Following an incident, the environmental control officer should be contacted once all persons are Safe and any immediate actions to control damage and manage the situation have been taken.       | N/A   | The Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 dictate the steps and relevant personal to be contacted to mitigate environmental pollution.                                                                                                                                                                                                                                                                                                      |
|         |                   | Following an incident, a rectification plan showing how environmental effects will be remedied and must be developed by the environmental control officer in consultation with the contractors.    | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 to manage environmental incidents                                                                                                     |
|         |                   | Following rectification of the situation, a full report must be prepared by the environmental control Officer.                                                                                     | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                     |

| Ref NO' | ACTIVITIES               | MITIGATION CONDITIONS                                                                                                                                                    | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|         |                          |                                                                                                                                                                          |       | Nonetheless, the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 for reporting requirements.                                                                                                                                                                                                                                                                                                         |
|         | Corrective actions       | In the event that a potential environmental incident or hazard is identified, the environmental Control officer is to prepare a report and recommend corrective actions. | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 that allows for reporting and corrective action.                                     |
|         |                          | The environmental control officer is to instruct the relevant contractor on the corrective procedures required and to request a full report on the actions taken.        | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 for action plan reporting requirements.                                              |
|         |                          | Upon receiving the report, the environmental control officer is to investigate the actions taken to ensure that they are appropriate.                                    | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, the Zibulo Incident and Non-conformance Reporting Procedure ZIB-ENV-PRO-0814, approved 28/08/22) and EWRP environmental incidents and complaints procedure is in place (Ref:SS-WTP-PRO-1416) dated 09/03/2023 for action plan reporting requirements and adequacy thereof.                         |
| 8.5.    | Compliance and Reporting |                                                                                                                                                                          |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|         | Monitoring               | Inspections and monitoring should be undertaken during the installation of the pipeline, its operation and decommissioning.                                              | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified) to ensure efficient and adequate infrastructure monitoring and maintenance. Additionally, EWRP undertake online monitoring through the SCADA system that can detect faults substantiated by physical periodical inspections.                                                                                         |
|         |                          | The monitoring program should be based primarily on a schedule of site inspections to ensure that environmental controls are in place and are being adhered to.          | C     | EWRP have an operations and maintenance manual (Ref: 0860-9803-KOI-100.00-00, dated 20 February 2011) that's implemented through an operation and maintenance 2023 schedule and maintenance logbook, dated 19 December 2022 (as verified). EWRP has environmental controls that include flowmeters and monitoring points that undergo water quality monitoring (as verified, Ref: S29-0265.04 issued December 2012) and water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023). The system is fully automated through SCADA. |
|         |                          | The Anglo Coal environmental control officer should prepare regular reports, which will outline any non-conformances and actions that are required.                      | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                    |

| Ref NO' | ACTIVITIES                                             | MITIGATION CONDITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | COMPL | AUDIT REVIEW AND OBSERVATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |       | Nonetheless, EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation.                                                                                                                                                                                                                                                |
|         | Non-conformance and corrective and preventative action | All non-conformances should be recorded during inspections and a corrective action response prepared and implemented to the satisfaction of the Anglo Coal environmental control officer. Implementation of corrective actions will require liaison between the environmental control officer and any contractors.                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. |
|         |                                                        | In implementing corrective actions, the following issues should be addressed: <ul style="list-style-type: none"> <li>• Identification of the cause of the non-conformance.</li> <li>• Identification and implementation of necessary corrective actions.</li> <li>• Identification of personnel responsible for carrying out corrective actions.</li> <li>• Implementation of modified controls necessary to avoid repetition.</li> <li>• Recording of any changes in written procedures.</li> </ul> | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. |
|         | Recording                                              | Records that should be collated include: <ul style="list-style-type: none"> <li>• Training and induction records (for all construction personnel).</li> <li>• Environmental inspection checklists and photographic records and any other monitoring data.</li> <li>• Non-conformances and corrective and preventative actions.</li> <li>• Environmental incident reports and rectification plans.</li> </ul>                                                                                         | N/A   | This condition falls outside this audit scope/period as all construction activities that an ECO is required for have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.<br>Nonetheless, EWRP undertake ecological monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) that allow for corrective mitigation. |
|         | Reporting                                              | Compliance with environmental management plans should be reported at regular periods during the construction, operation and decommissioning phases of the project. Such reports should provide an assessment of the implementation and effectiveness of environmental controls and conditions in relation to the work undertaken and details of non-conformances and corrective and preventative actions taken.                                                                                      | C     | EWRP undertake regular monitoring and auditing to ensure compliance to environmental legislation, including: <ul style="list-style-type: none"> <li>• External audit Report (EMPr &amp; EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022.</li> <li>• NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 period, to verify compliance against conditions of the licence, permits issued for EWRP.</li> </ul>                                              |
|         | Auditing                                               | Periodic, independent audits of compliance with environmental management plans should be undertaken to verify that they are being implemented. The audit should cover the following: <ul style="list-style-type: none"> <li>• Adherence to environmental procedures (site inspection).</li> <li>• Completeness of records.</li> <li>• Completeness of environmental reports and actions taken in response to them.</li> <li>• Response to environmental incidents.</li> </ul>                        | C     | EWRP undertake regular monitoring and auditing to ensure compliance to environmental legislation, including: <ul style="list-style-type: none"> <li>• External audit Report (EMPr &amp; EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022.</li> <li>• NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 period, to verify compliance against conditions of the license, permits issued for EWRP.</li> </ul>                                              |
|         |                                                        | The findings of the audit should be communicated to relevant interested and affected parties associated with the project.                                                                                                                                                                                                                                                                                                                                                                            | C     | External audit Report (EMPr & EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022 was distributed to interested and affected parties as part of public participation (as verified).                                                                                                                                                                                                                                                                                                                            |

**Table 5: The EWRP's authorisation for the proposed construction of a pipeline from the water treatment plant at Greenside Colliery' to Phola coal plant, dated 8 March 2010 (DEDET Reference No.: 17/2/13NK31).**

| REF                | CONDITION                                                                                                                                                                                                                                                                                                                                                                   | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General conditions |                                                                                                                                                                                                                                                                                                                                                                             |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1.                 | This Authorisation refers only to the project as specified above and described in the Record of Decision. A separate application must be lodged for any other development and/or activity at or near the proposed construction of Greenside Colliery's pipeline which is covered by Section 21 and 22 of the Act and Government Notice R1182 and R1183 of 5 September 1997. | C     | The condition has been noted by the holder of the authorisation (Thungela).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.                 | Authorisation is only granted in terms of Section 22 of the Act and does not exempt the holder from compliance with any other relevant legislation.                                                                                                                                                                                                                         | C     | The condition has been noted by the holder of the authorisation (Thungela) and complies to the necessary approvals/ permits received from other legislation. Condition 3 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.                 | No development may take place on the area of concern without the necessary permits/approvals and/or service agreements, where it is relevant, from other authorities.                                                                                                                                                                                                       | C     | <p>Thungela has received the below authorisations from the respective authorities:</p> <p><u>MEDET- EAs</u></p> <ul style="list-style-type: none"> <li>- EA for Phase I of the EWRP (Ref. No. 17/2/12/NK 16, Dated 2 November 2005 as amended under Ref. No. 17/2/12/NK 16 (H06-30), dated 16 October 2006.</li> <li>- EA for Phase II of the EWRP (Ref. No. No. 17/2/2/1 (e) MP-5, Dated 22 July 2011.</li> </ul> <p><u>DWS- WUL and GA</u></p> <ul style="list-style-type: none"> <li>- General Authorisation certificate for the - Brine Treatment Facility, Ref No. 24102221, dated September 2018, and</li> </ul> <p>Integrated Water Use Licence Ref No. 04/B11G/ACFGI/1853, dated 14 August 2020, as amended.</p> |
| 4.                 | Copies of the relevant documents mentioned in 3 above, must be forwarded to this department within three (3) months of the issuing of this Authorisation.                                                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period as all authority correspondence i.e., related to construction have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5.                 | This department may change or amend any of the conditions in this Authorisation if, in the opinion of the department, is environmentally justified.                                                                                                                                                                                                                         | N/A   | Thungela has taken note of the condition and amendment of the conditions of this authorisation has been undertaken by the department for this reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 6.                 | The development must comply with all mitigatory measures as set out in the documentation submitted for this application for the construction of Greenside Colliery's pipeline.                                                                                                                                                                                              | C     | Thungela has taken note of the condition and the requirements thereof are noted. Nonetheless, no non-conformance to the applicable conditions under the EWRP EMP construction phase valid have been noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7.                 | A copy of this Authorisation must be made available at the offices of Anglo coal at all times and all relevant staff, contractors and sub-contractors must be acquainted or be made acquainted with the content of this Authorisation.                                                                                                                                      | C     | The auditors verified that a copy of authorisation is kept on site. The EA and associated licences and permit form part of the contractual pack for all relevant employees and sub-contractors. All employees and contractors are provided with a contractual pack with the respective authorisations or induction (environmental awareness 2023 induction presentation) or training verified during the audit period.                                                                                                                                                                                                                                                                                                   |

| REF                               | CONDITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.                                | The applicant must within five (5) calendar days of receipt of this Record of Decision (ROD) a) Advertise the issuing of the Authorisation in the regional and/or local newspaper. b) Inform (in writing) all interested and affected parties registered during the EIA process of the decision. c) The above must state at least the following: (i) That Authorisation has been issued to the applicant to continue with the proposed activity. (ii) That any appeal against the issuing of the Authorisation must be lodged with the MEC for Agriculture and Land Administration within thirty (30) days from the date on which the ROD has been issued to the applicant and at the address stipulated in the Record of Decision. (iii) Include the date on which the Record of Decision was issued to the applicant and the date by which appeals must reach the MEC (iv) Indicate where the copies of the Authorization can be viewed/obtained. | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., authority correspondence have been completed and were not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                    |
| <b>Construction and Operation</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |       |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                 | The pipeline route must run along the farm boundaries in order to minimise the impact of the pipeline along those properties                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | C     | No non-compliance observed for this condition. The auditors verified that the constructed pipeline route predominantly runs along farm boundaries (verified in the shapefiles, locality maps for EWRP Pipelines, WULA application amendment pack, dated June 2019).                                                                                                                                                              |
| 2                                 | The developer must provide adequate sanitation facilities and potable water for the construction workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | C     | Adequate permanent sanitation facilities have been placed at various locations within EWRP. Should constructions sites be far from sanitation facilities, temporary chemical toilets will be made available at strategic areas to future construction workers.                                                                                                                                                                   |
| 3                                 | Proper stormwater control measures must be implemented in order to prevent the accumulation of water and soil erosion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | C     | The stormwater management plan is implemented on site. The stormwater channel was found to be diverted away from the plant and office buildings to the sumps.<br><br>Refer to Appendix B: Photo 16                                                                                                                                                                                                                               |
| 4                                 | Construction must take place during dry months in order to avoid wet operation as they might impact negatively on the environment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, Thungela have taken note of the condition for future construction works.                                                                                                                            |
| 5                                 | During the construction period, areas to be affected by the construction of the pipeline must be checked for any sensitive species prior to construction particularly at the watercourse crossing and in the pan area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, even though the condition falls outside of the audit period, mitigation measures were implementation as part of the EMPr and WULA condition parameters noted herein, under General Conditions No 3. |
| 6                                 | During construction the necessary water handling measures must be put in place to ensure that the working area remains dry, thus preventing erosion and limiting any suspended solids increase in the tributaries of Grootspuit and other tributaries of Saalkspruit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, Thungela have taken note of the condition for future construction works.                                                                                                                            |
| 7                                 | The digging of a trench for the pipeline route must be backfilled immediately once the pipeline has been placed into it to avoid negative impacts that might arise therefore of.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, Thungela have taken note of the condition for future construction works.                                                                                                                            |

| REF | CONDITION                                                                                                                                                                                                                                                                                                                               | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8   | The storage and handling of fuel, lubricants and other chemicals must be done especially in demarcated impervious and bunded areas.                                                                                                                                                                                                     | C     | No non-compliance was observed by the auditors. All storage and handling areas is undertaken on clearly demarcated impervious, bunded areas. Verified onsite by the refuelling area (fuel was stored in mobile diesel bowsters and or trailers); Chlorination area (Hydrochloric Acid and Sodium Hydroxide); Lime handling area.<br><br>Refer to Appendix B: Photo 9 and 10                                                                                                                                                   |
| 9   | HDPE pipes must be used to minimize the likelihood of leaks that might result in spillages of dirty water into Grootspuit and Saalksprit rivers.                                                                                                                                                                                        | C     | No non-compliance was observed during the audit period. HDPE pipes are utilised, and no leaks were observed from the assessed sites.                                                                                                                                                                                                                                                                                                                                                                                          |
| 10  | Comments from Department of Transport and Roads, Water Affairs and Forestry as well as Spoornet must be adhered to.                                                                                                                                                                                                                     | N/A   | This condition falls outside this audit scope/period as all comments were related to the construction activities which have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023. Nonetheless, Comments from Department of Transport and Roads, Water Affairs and Forestry as well as Spoornet and recommendations were incorporated into the EMPr mitigation measures (verified in the Greenside/Phola Coal Plant water pipeline EMPR, Ref: 17/2/13 NK 31). |
| 11  | Vegetation must be removed for the excavation of the 1m trench for the pipeline construction and the pipeline must be buried 1m below the surface in order to minimize the impact on faunal migration.                                                                                                                                  | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                               |
| 12  | During decommissioning, the activity on the floodplain must be restricted to the immediate areas of demolition works only. Exposed areas must be seeded and be vegetated after the completion of the work.                                                                                                                              | N/A   | This condition falls outside this audit scope/period as all decommissioning activities have not yet commenced and a separate EA will need to be applied and issued (verified in the consolidated Phase 1 and Phase 2 EMPr, dated September 2021). NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                      |
| 13  | As the burial of the pipeline is for temporary crossing, it must be upgraded to a formalised bridge crossing and the pipeline must therefore be lifted up. During the lifting of the pipeline, the necessary water handling measures must be in place to ensure that the flow is able to pass freely, ensuring no impedance to the flow | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                               |
| 14  | Vegetation clearance must be kept to the minimum and construction activities must be confined to the marked areas                                                                                                                                                                                                                       | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                               |

**Table 6: THE EWRP'S AUTHORISATION FOR THE PROPOSED PHASE 2 EXPANSION OF THE EWRP CAPACITY TO TREATING 50ML (PEAKING AT 60ML) OF MINE WATER DAILY (REF: 17/2/2/1(E) MP-5).**

| REF | CONDITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3   | <b>Scope of authorisation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.1 | Authorisation of the activity is subject to the conditions contained in this authorisation, which form part of the environmental authorisation and are binding on the holder of the authorisation.                                                                                                                                                                                                                                                                                                                    | C     | The condition has been noted by the holder of the authorisation (Thungela). The authorisation was issued in accordance with the requirements of NEMA and applicable regulations thereto.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.2 | The holder of the authorisation must ensure compliance with the conditions by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor employee or person rendering a service to the holder of the authorisation.                                                                                                                                                                                                                                                               | C     | Bongeka Madolo is the appointed Plant Manager responsible for ensuring compliance with environmental legislation and licenses/permits issued to Thungela for the EWRP. EWRP undertake regular monitoring and auditing to ensure compliance to environmental legislation, including: <ul style="list-style-type: none"> <li>External audit Report (EMPr &amp; EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022.</li> <li>DWS 2022 Quarterly Reports (Report No': 26 and 28).</li> <li>NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 period, to verify compliance against conditions of the licence, permits issued for EWRP.</li> </ul> |
| 3.3 | The activity which is authorised may only be carried out at the property indicated (refer to the authorisation).                                                                                                                                                                                                                                                                                                                                                                                                      | C     | No non-compliances observed during the audit period. The activity which is authorised is carried out at the property indicated in the authorisation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.4 | Any changes to, or deviations from, the project description set out in this authorisation must be approved, in writing, by the department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations. | C     | No non-compliance was observed during the audit period. The site assessment and verified documentation confirmed that the project description has changed, as further confirmed by the Licensee.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.5 | This activity must commence within a period of two (2) years from the date of issue. If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.                                                                                                                                                                                                                       | N/A   | NTC Group was appointed as external auditors for the 2022/2023 audit period to audit compliance against EA during the operational phase of the EWRP. The EWRP was granted an authorisation EA (Ref No. 17221(e) MP- 5 in July 2011. The construction phase has been concluded and this condition is no longer applicable.                                                                                                                                                                                                                                                                                                                                                                                       |
| 3.6 | This authorisation does not negate the holder of the authorisation, responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.                                                                                                                                                                                                                                                                                                                         | C     | Thungela has received the below authorisations from the respective authorities for compliance monitoring: <p><u>MEDET EAs</u></p> <ul style="list-style-type: none"> <li>EA for Phase I of the EWRP (including amendment) (Ref. No. 17/2/12/NK 16, Dated 2 November 2005 and</li> <li>EA for Phase I of the EWRP (including amendment) (Ref. No. 17/2/12/NK 16 (H06-30), dated 16 October 2006.</li> </ul> <p><u>DWS WULA and GA</u></p> <ul style="list-style-type: none"> <li>General Authorisation certificate for the - Brine Treatment Facility, Ref No. 24102221, dated September 2018</li> </ul> Integrated Water Use Licence Ref No. 04/B11G/ACFGI/1853, dated 14 August 2020.                          |
|     | <b>Appeal of authorisation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.7 | The holder of the authorisation must notify every registered interested and affected party, in writing and within 12 (Twelve) calendar days of receiving notice of the department's decision to authorize the activity.                                                                                                                                                                                                                                                                                               | N/A   | NTC Group was appointed as external auditors for the 2022/2023 audit period to audit compliance against EA during the operational phase of the EWRP. Nonetheless, a notification letter for the amended ROD, dated 22 July 2011 and the EMPr was verified with the correct project description, however the reference number (MDEDET Ref No. 17/2/2/1(e) NK-5) did not correspond with the approved EA (MDEDET Ref No.17/2/2/1(e) MP-5). Notification of I&APs were notified was provided to the auditor. However, this condition is not applicable for this auditing period.                                                                                                                                   |
| 3.8 | The notification referred to above must -                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| REF   | CONDITION                                                                                                                                                                                                                      | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.8.1 | Specify the date on which the authorisation was issued;                                                                                                                                                                        | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., stakeholder correspondence have been completed and were not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.8.2 | inform the interested and affected party of the appeal procedure provided for in Chapter 7 of the regulations; and                                                                                                             | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., stakeholder correspondence have been completed and were not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.8.3 | advise the interested and affected party that a copy of the authorisation and reasons for the decision will be furnished on request.                                                                                           | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., stakeholder correspondence have been completed and were not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|       | <b>Management of the activity</b>                                                                                                                                                                                              |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.8.4 | The attached Environmental Management Plan ("EMP") is accordingly approved and forms part of this authorisation and is a legally binding document.                                                                             | C     | <p>The EMPr for this Phase 2 EA has been consolidated into the Phase 1 and Phase 2 EMPr (dated September 2021). The mitigation measures of this EMPr are strictly implemented onsite and are legally binding as per the requirement of Regulation 34 of NEMA (as amended). EWRP undertake regular monitoring and auditing to ensure compliance to EMPr, including:</p> <ul style="list-style-type: none"> <li>External audit Report (EMPr &amp; EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022.</li> <li>NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023 period, to verify compliance against conditions of the EMPr for EWRP.</li> </ul>                                                                                                                                                                                                                                                            |
| 3.9   | An independent Environmental Control Officer must be appointed to ensure compliance with the conditions of this Environmental Authorisation.                                                                                   | N/A   | <p>This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.</p> <p>Nonetheless, the appointment of the ECO and respective reports during construction were not verified during this audit period as per the roles and responsibilities off the ECO during the construction period (verified in the consolidated EMPr, dated September 2021). However, a Part 1 amendment process was undertaken to amend this condition as follows "An independent third-party consultant must be contracted by Thungela to conduct annual audits / review and reporting on the Environmental Authorisation, which must be submitted to DMRE". However, proof of submission and correspondence with relevant authority was not verified during the audit period (verified in the Part 1 amendment application, dated August 2021).</p> |
| 3.10  | The holder of the authorisation must submit a post-construction environmental audit report to the department. The audit report must be compiled by an independent auditor.                                                     | N/A   | <p>This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.</p> <p>Nonetheless, the post-construction environmental audit report to the department was not verified during the audit period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3.11  | The department retains the right to monitor and/or inspect the proposed project.                                                                                                                                               | C     | Condition has been noted by the holder of the authorisation, Thungela. The proposed project is being monitored through external audit report submissions to the department. Nevertheless, the client is aware that the department may request to conduct an inspection of the EWRP operation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.12  | The Environmental Control Officer must ensure that all environmental activities delegated to contractors operating on site are implemented and ensure that all conditions of the Environmental management Plan are adhered to. | N/A   | <p>This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.</p> <p>Nonetheless, the appointment of the ECO and respective reports during construction were not verified during this audit period as per the roles and responsibilities off the ECO during the construction period (verified in the consolidated EMPr, dated September 2021). Furthermore, it's been noted that Synergistics Environmental Services was the</p>                                                                                                                                                                                                                                                                                                                                                                                         |

| REF                              | CONDITION                                                                                                                                                                                                                                                           | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                  |                                                                                                                                                                                                                                                                     |       | appointed ECO during the construction phase. (Verified in the External audit Report (EMPr & EA) compiled by Geovicon Environmental (Pty) Ltd dated March 2022).                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.13                             | Purple Stone Investment must ensure that there is an induction to all contractors in relation to environmental and social issues and awareness training to build capacity of staff regarding the management of the environment.                                     | C     | The EA and associated licences and permit form part of the contractual pack for all relevant employees and sub-contractors. Proof of environmental and social awareness induction or training of employees was verified during the audit period. It was noted that Purple Stone Investment was incorrectly identified on issuance of EA and Thungela is responsible for all training requirements as per this condition and an amendment process to rectify this condition is underway.                                                                                                                    |
| <b>Operation of the activity</b> |                                                                                                                                                                                                                                                                     |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.14                             | Fourteen (14) days written notice must be given to the department that the activity will commence. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will end. | N/A   | NTC Group was appointed as external auditors for the 2022/2023 audit period to audit compliance against EA during the operational phase of the EWRP, therefore this condition is considered not applicable. However, the notification letter detailing condition parameters was not verified during this audit period.                                                                                                                                                                                                                                                                                     |
| 3.15                             | All construction activities must be limited to the said site. No activities must be allowed on adjacent vacant properties.                                                                                                                                          | C     | No non-compliances observed during the audit period. The activity which is authorised is carried out at the property authorised for EWRP Phase 2 activities. Condition 3.1. refers.                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.16                             | Chemical toilets must be provided to be used by site workers. These must be serviced on a regular basis. No pit latrines must be allowed.                                                                                                                           | C     | No chemical toilets have been used for site workers during the audit period as permanent sanitation facilities have been placed at various locations within EWRP. Nonetheless, adequate temporary sanitation facilities are made available as and when required for all site workers that adhere to OHS standards.                                                                                                                                                                                                                                                                                         |
| 3.17                             | Chemical sanitation facilities must not be positioned closer than 100m from the surface stream.                                                                                                                                                                     | C     | Adequate permanent sanitation facilities have been placed at various locations within EWRP. Should constructions sites be far from sanitation facilities, temporary chemical toilets will be positioned 100m from watercourses for future construction workers.                                                                                                                                                                                                                                                                                                                                            |
| 3.18                             | Flood berm must be built along the EWRP to stop flood water inundating the plant should a discharge take place when the flow on the Naauwpoortspruit is high, or if heavy rainfalls occur soon after a discharge.                                                   | N/C   | It was noted that no flood berms were constructed, and all Phase 2 surface infrastructures were located outside of the 1:100-year flood lines. The Licensee also highlighted that an application to remove this condition was lodged to MEDET (verified in the Part 1 amendment application, dated August 2021).                                                                                                                                                                                                                                                                                           |
| 3.19                             | Discharge from the EWRP into the Naauwpoortspruit, must not be directly into the stream, but routed through a velocity reduction mechanism such as a temporary storage dam.                                                                                         | C     | No non-compliance observed during the audit period. Velocity reduction measures are in place prior to discharge and include: A V-trench that opens into an infiltration trench/ canal that is backfilled with mini gabions (rock and geotextile lined with evidence of established vegetation growth).<br>Refer to Appendix B: Photo 13 and 16                                                                                                                                                                                                                                                             |
| 3.20                             | The discharge point must also have erosion reduction such as gabion baskets or rocks.                                                                                                                                                                               | C     | No non-compliance observed during the audit period. Mini gabions (rock and geotextile lined with evidence of established vegetation growth) sited as per condition 3.19.<br>Refer to Appendix BPH: Photo 13 and 16                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.21                             | A monitoring programme must be implemented in relation to the discharge. This will include sampling of the typical water quality parameters as necessary, when discharge takes place                                                                                | C     | No non-compliance observed during the audit period. EWRP implements a water management plan through the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012). A water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) is in place. The Water Quality reports (Q2 and Q4, dated 2022) and the blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply with the latest SANS 241 drinking water quality standards and blue drop standard (> 90% microbiology, chemical parameters) respectively. |

| REF  | CONDITION                                                                                                                                                                                                    | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| 3.22 | EWRP must not be allowed to make the full discharge of 50 MI into the stream unless the flow downstream at weir B1H019 is less than 1.55m <sup>3</sup> /s.                                                   | C     | EWRP has installed flowmeters at all monitoring points inclusive of the condition requirements herein and recordings as per the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023). The system is fully automated through SCADA.                                                                                                                                                                                                                                                                                                                |
| 3.23 | The total flow of discharge in the stream, which includes the natural flow and the discharge, must not exceed 2.16m <sup>3</sup> /s.                                                                         | C     | No non-compliance observed during the audit period and condition parameters are not exceeded (verified in the Quarterly reports, dated 2022 and blue drop compliance 2022 annual report).                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.24 | Chemical characterization of gypsum sludge must always be conducted for purposes of a health risk assessment.                                                                                                | N/C   | The chemical characterisation of gypsum sludge was not verified during the audit period. However, a registration certificate characterising the gypsum as a group II fertilizer, expired 31 December 2015 was verified during audit period but is no longer valid. Additionally, a Part 1 amendment process to rectify this condition is underway.                                                                                                                                                                                                                                                                                                                   |
| 3.25 | Water reverse osmosis/membrane, ultra filtration and drain sump pump must be sterilized always to prevent health risks.                                                                                      | C     | No non-compliance observed during the audit period. It was noted that chlorine is added to the EWRP system as a disinfectant and as a water sterilizing agent prior to discharge (verified in the operation and maintenance manual, Ref: KOI.100.00-00, dated 20 February 2011). Additionally, a Part 1 amendment process to rectify this condition is underway.                                                                                                                                                                                                                                                                                                     |
| 3.26 | Assessments must be made on the significance of the potential groundwater impact from the sludge.                                                                                                            | C     | The auditors observed that the gypsum sludge was temporarily stored on site prior to being sold to the third party (farmer). According to the EMPR Part 1 amendment application (dated August 2021)- there is potential impacts on groundwater resources by the sludge, however dewatering activities will reduce this impact. A groundwater specialist reports by Golder 2005/2006 and 2011 reports were verified to confirm condition parameters.                                                                                                                                                                                                                  |
| 3.27 | Mass balance modelling results must be reviewed and used to indicate the sludge from the potential groundwater impact.                                                                                       | C     | The auditors observed that the gypsum sludge was temporarily stored on site prior to being sold to the third party (farmer). According to the EMPR Part 1 amendment application (dated August 2021)- there is potential impacts on groundwater resources by the sludge, however dewatering activities will reduce this impact. Monthly Mass balance reports (January to March 2023) were verified to confirm condition parameters.<br>Refer to Appendix B: Photo 14                                                                                                                                                                                                  |
| 3.28 | The Water Use Licence Application must be amended and sent to the Department of Water Affairs for assessments on the project expansion.                                                                      | C     | The EWRP Phase II expansion WUL (Licence No. 04/B11G/ACFGI/1853) was authorised on 3 August 2012 by the relevant authorities. This license has been amended through a consolidation process of relevant WUL issued to EWRP to form one IWUL.                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.29 | An estimate of the sludge composition must be made from the modelling results and presented with the sludge composition analyses.                                                                            | N/C   | Proof of the sludge composition analyses was not provided for verification during the audit as part of the modelling results. It was noted that a laboratory has been sub-contracted to undertake sampling and analysis. According to the EMPR Part 1 amendment application (dated August 2021)- Phase 2 Expansion process water quality will be replaced with measured laboratory results as per GN R.635, Standards for the Assessment of Waste for Landfill Disposal gazetted -DEA GN 36784, dated 23 August 2013). These include Total Concentrations (TC) and Leachable Concentration (LC) and exceedances of the threshold limits determine the type of waste. |
| 3.30 | As for the sludge composition, the modelled process water quality must be considered indicative since it is based on assumptions associated with the mass balance simulation of the water treatment process. | C     | No non-compliance was noted during the audit period. Water quality analysis is undertaken at identified quality control points as per the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023).                                                                                                                                                                                                                                                                                                                                                   |

| REF  | CONDITION                                                                                                                                              | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 3.31 | The modelled process water quality presented must be considered a conservative indication of the potential leachate quality from the Expansion Sludge. | C     | The auditors verified the groundwater and mass balance specialist reports as per Condition 3.26 and 3.27. during the audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3.32 | The Expansion Sludge must only be assessed from laboratory analysis when it becomes available.                                                         | N/C   | It was noted that a laboratory has been sub-contracted to undertake sampling and analysis of the expansion sludge as per condition 3.29. However, proof of these analysis reports was not verified during the audit period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3.33 | All cement used during the construction period must be housed in properly protected sheds that will prevent spilling into the receiving environment.   | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., no activities requiring cement use have been undertaken during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3.34 | Measures must be implemented to ensure that no glass, plastic, metal, or paper must be allowed to spread into the environment.                         | N/C   | Good housekeeping and waste management practice was observed at the offices. However, waste separation at source is not being fully implemented as an unlabelled bin and mixture of general and hazardous waste was noted in a hazardous with a damaged label. EWRP implements a waste management procedure and agreements are in place for a third-party collection and disposal of general (Phola Landfill) and hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021). Proof of safe disposal slips for TL Ideas were verified in the stamped waste manifest (dated June 2022 to March 2023)                                        |
| 3.35 | Vehicles and construction equipment must be well serviced so that it does not produce excessive smoke.                                                 | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.36 | The contractors must ensure that the construction vehicles are in a good condition and do not leak oil or transmission fluid onto the site.            | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.37 | Soil contaminated by oil from leaking vehicles must be collected and disposed of at a hazardous waste disposal site.                                   | C     | EWRP implements a waste management procedure and agreements are in place for a third-party collection and disposal of hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021). Proof of safe disposal slips for oil contaminated waste was verified in the stamped waste manifest (dated 10, 17 and 24 June 2022). However, safe disposal slips from July 2022 to March 2023 were not verified. Depending on the nature of the spill, Spill kits observed onsite may be used in line with the Spill Kit Procedure, Doc No' SS-WTP-PRO-1417, Approved 02/11/2022; and/or or a hazardous waste sub-contractor comes to collect the waste. |
| 3.38 | The construction machinery must be fitted with noise mufflers and be maintained properly to avoid the migration of animals familiar with the area.     | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.39 | Blasting must be done with appropriate noise abatement equipment and accessories e.g., blasting mats.                                                  | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| REF  | CONDITION                                                                                                                                                                                   | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 3.40 | Temporary vehicle maintenance yard and storage area must be fenced off and placed at least 100m away from the drainage channel.                                                             | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.41 | Slopes produced by removing of soil must be kept to a minimum to reduce the chances of erosion damage to the area.                                                                          | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.42 | The contractor must conform to all the stipulations of the Occupational Health and Safety Act (Act 85 of 1993) and the regulations applicable at the time of the tender.                    | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.43 | Waste generated during construction must be disposed of at a registered landfill site.                                                                                                      | N/A   | All construction activities are concluded, and the site is in its operational phase, thus this condition is no longer applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3.44 | A waste management and recycling plan must be compiled for the construction phase of the development.                                                                                       | N/A   | This condition falls outside this audit scope/period as all construction activities have been completed. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.45 | The solid waste must be kept in animal proof bins from where it will be removed to the municipal waste disposal site on a weekly basis.                                                     | C     | Solid waste disposal is undertaken through use of labelled, closeable trolley bins that are animal proof onsite. However not all skips are closeable or have an animal roof covering i.e., net. EWRP implements a waste management procedure and agreements are in place for a third-party collection and disposal of general (Phola Landfill) verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021. Proof of safe disposal slips were verified in the stamped waste manifest (dated June 2022 to March 2023).                                                                                                       |
| 3.46 | The fire safety design of the development must satisfy the requirements of SANS 10400 Code of Practice as well as SANS 10090 community protection against fire regarding fire requirements. | N/C   | The fire development safety design was not verified during the audit period. However, fire-fighting equipment (unserviced fire extinguishers, fire hydrants, fire breaks) were noted onsite.<br><br>Refer to Appendix B: Photo 3                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3.47 | Storm water capacity of the development area must be well designed to ensure that the surface pollution being washed into the river system is limited.                                      | N/C   | Storm water on site is managed through v-drains, directing run-off water to the environmental sump or Noupootspruit. pollutant-contaminated water is directed to the sump, retreated, and pumped back into the EWRP processes. The Emergency Preparedness Procedure is in plan , Doc No' SS-WTPPRO- 1611, Approved 11 November 2022 (as verified). The storm water management plan valid for the audit period was not verified. The Stormwater Management Plan, Doc No' SS-WTP-PRO-1685 provided upon report finalisation, has an implementation date outside of the audit period (05/09/2023) and thus compliance will be assigned in the next audit. |
| 3.48 | Anglo American Thermal Coal is responsible for the removal and appropriate disposal at a landfill site of all maintenance waste products during the operational phase.                      | C     | EWRP implements a waste management procedure and agreements are in place for a third-party collection and disposal of general (Phola Landfill) and hazardous waste (Holfontein Landfill) (verified in the TL Ideas trading Waste transporter Certificate dated 30 September 2021). Proof of safe disposal slips were verified in the stamped waste manifest (dated July 2022 to March 2023).                                                                                                                                                                                                                                                           |

| REF  | CONDITION                                                                                                                                                                                                                                                                                                                                                   | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.49 | Anglo American Thermal Coal must ensure that the material generated during the decommissioning phase is cleared from the site and disposed at a registered landfill site.                                                                                                                                                                                   | N/A   | This condition falls outside this audit scope/period as all decommission activities have not yet commenced. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                     |
|      | <b>General</b>                                                                                                                                                                                                                                                                                                                                              |       |                                                                                                                                                                                                                                                                                                                                                        |
| 3.50 | A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property. | C     | A copy of the authorisation was available on site during the audit.                                                                                                                                                                                                                                                                                    |
| 3.51 | Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/ or telephonic details, the applicant must notify the department as soon as the applicant knows the new details.                                                                                                      | C     | During the site assessment and subsequent discussions held with Licensee, it was determined that the name of the mine as indicated in the approved EA (Ref 17/2/2/1(e) MP-5) has changed from Anglo Operations Limited to Thungela. Proof of submission of the name change was verified (a letter dated March 2022).                                   |
| 3.52 | The holder of the authorisation must notify the department, in writing and within 24 (twenty-four) hours, if conditions of this authorisation are not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non- compliance.                                                                                       | N/C   | Thungela has taken note of the condition and is aware of the binding nature of the authorisation. No non-conformances reporting with 24 hrs was verified for non-conformances for this audit period. Any notification in terms of this condition must be accompanied by reasons for the non- compliance especially for external repeat findings noted. |
| 3.53 | Non-compliance with a condition of this authorisation may result in criminal prosecution other actions provided for in the National Environmental Management Act, 1998 and the regulations.                                                                                                                                                                 | N/A   | Thungela has taken note of the condition and is aware of the binding nature of the authorisation. Refer to condition 3.52.                                                                                                                                                                                                                             |

**Table 7: THE EWRP'S AUTHORISATION FOR THE PROPOSED PHASE 1 (REF: 17/2/12/NK 16 (H06-30)).**

| NO  | CONDITION                                                                                                                                                                                                                                                                                                              | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | <b>General Conditions</b>                                                                                                                                                                                                                                                                                              |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1.1 | This authorisation refers only to the project specified above and described in the Record of Decision. Separate applications must be lodged for any other development and/or activity at or near the proposed development, which is covered by Section 21 of the Act and Government Notice R 1182 of 5 September 1997. | C     | The condition has been noted by the holder of the authorisation (Thungela). The authorisation was issued in accordance with the requirements of NEMA and applicable regulations thereto.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.2 | Authorisation is only granted in terms of Section 22(3) of the Act and does not exempt the holder from compliance with other relevant authorities.                                                                                                                                                                     | C     | The condition has been noted by the holder of the authorisation (Thungela) and complies to the necessary approvals/ permits received from other legislation. Condition 1.3 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1.3 | No development may take place in the area of concern without the necessary permits/approvals and/or service agreements from all relevant authorities.                                                                                                                                                                  | C     | Thungela has received the below authorisations from the respective authorities:<br><u>MEDET- EAs</u><br><ul style="list-style-type: none"> <li>- EA for Phase I of the EWRP (including amendment) (Ref. No. 17/2/12/NK 16, Dated 2 November 2005,</li> <li>- Greenside Colliery' to Phola coal plant pipeline (DEDET Reference No.: 17/2/13NK31) dated 8 March 2010,</li> <li>- EA for Phase I of the EWRP (including amendment) (Ref. No. 17/2/12/NK 16 (H06-30), dated 16 October 2006.</li> </ul> <u>DWS- WUL and GA</u><br><ul style="list-style-type: none"> <li>- General Authorisation certificate for the - Brine Treatment Facility, Ref No. 24102221, dated September 2018, Integrated Water Use Licence Ref No. 04/B11G/ACFGI/1853, dated 14 August 2020, as amended.</li> </ul> |
| 1.4 | Copies mentioned in 1.3 above must be forwarded to the department immediately when they become available.                                                                                                                                                                                                              | N/A   | This condition falls outside this audit scope/period as all authority correspondence i.e., related to construction have been completed and were not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1.5 | This department may add, change and/or amend any of the conditions in this authorisation if, in the opinion of the department, is environmentally justified.                                                                                                                                                           | N/A   | Thungela has taken note of the condition and no change or amendment of the conditions of this authorisation has been undertaken by the department for this audit reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1.6 | The content of this authorisation must be made known to all registered Interested and Affected Parties within five (5) days of the date of issue of this authorisation.                                                                                                                                                | N/A   | This condition falls outside this audit scope/period as all construction activities i.e., authority correspondence have been completed, however the notification to I&APs was not verified during this audit period. NTC Group (Pty) Ltd was appointed as the independent external auditor for the March 2022 – March 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2   | <b>Establishment of the Project</b>                                                                                                                                                                                                                                                                                    |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2.1 | This authorisation is repealed if the project has not commenced within two (2) years from the date of this authorisation.                                                                                                                                                                                              | N/A   | NTC Group was appointed as external auditors for the 2022/2023 audit period to audit compliance against EA during the operational phase of the EWRP. The construction phase has been concluded and this condition is no longer applicable. However, construction commenced within the two (2) year timeframe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.2 | Fourteen days written notice must be given to this department before commencement with construction.                                                                                                                                                                                                                   | N/A   | NTC Group was appointed as external auditors for the 2022/2023 audit period to audit compliance against EA during the operational phase of the EWRP, therefore this condition is considered not applicable. However, the notification letter detailing condition parameters was not verified during this audit period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3   | <b>Mine Water Make Abstraction</b>                                                                                                                                                                                                                                                                                     |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3.1 | Responsible management of mine water must allow abstraction at all seasons.                                                                                                                                                                                                                                            | C     | No noncompliance observed. Mine water abstraction to EWRP occurs throughout the year and only ceased when emergency incidents occur. Records of treated water was verified during the audit period (Daily treatment volumes, from June 2021 to June 2022).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| NO   | CONDITION                                                                                                                                                                                                               | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 3.2  | Only excess mine water must be contributed to the scheme.                                                                                                                                                               | C     | During the audit, it was confirmed that only excessive mine water is contributed into the scheme as the capacity of EWRP cannot exceed the authorized peak of 60ML.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4    | <b>Surface Water and Treated Mine Water</b>                                                                                                                                                                             |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 4.1  | Ensure that the treated mine water is typically a SABS 24 1 Class O water as this is the highest class of potable water.                                                                                                | C     | No non-compliance observed during the audit period. EWRP implements a water management plan through the water quality monitoring procedure (Ref: S29-0265.04 issued December 2012). A water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) is in place. The Water Quality reports (Q2 and Q4, dated 2022) and the blue drop 2022 annual compliance report compiled and submitted to the relevant authorities generally comply with the latest SANS 241 drinking water quality standards and blue drop standard (> 90% microbiology, chemical parameters) respectively. |
| 4.2  | Establish a clean and dirty water cut off and containment drains to ensure that dirty water is maintained within the plant area and disposal facility and that clean water be discharged into natural drainage courses. | C     | The separation of clean and dirty water was confirmed on site through site observations. The Plant is designed such that all dirty surface water will collect at the environmental sump from where it is re-pumped back into the EWRP process. Only treated clean water is released from the Plant to the nearby Naauwpoortspruit.                                                                                                                                                                                                                                                                         |
| 4.3  | Construction activities must not be within the 1:100-year foodline of any natural watercourses.                                                                                                                         | N/A   | EWRP is currently in the operational phase, therefore this condition is not applicable in this auditing period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 4.4  | Construct wetland and river crossings during the dry season.                                                                                                                                                            | N/A   | This is a construction activity condition; the EWRP is currently in its operational phase, therefore this condition is not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4.5  | Only non-carbonaceous fill material must be used for river and wetland crossing sites.                                                                                                                                  | N/A   | This is a construction activity; the EWRP is currently in its operational phase, therefore this condition is not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4.6  | Pipelines are not to be buried in river and wetland crossing areas.                                                                                                                                                     | N/A   | EWRP is currently in its operational phase, however, the pipeline as per the EIA report undertaken by Golder Associate, dated August 2006 highlighted that the pipeline must not be buried on wetland areas and rivers.                                                                                                                                                                                                                                                                                                                                                                                    |
| 4.7  | Once the pipeline has been installed and the material is returned to its former position, the area must be revegetated.                                                                                                 | N/A   | The holder of the authorisation (Thungela) is aware of this condition and the requirements thereof are noted. However, the EWRP is in the operational phase, therefore this condition is applicable in the construction phase.                                                                                                                                                                                                                                                                                                                                                                             |
| 4.8  | Care must be taken to limit construction activities in small wetland areas adjacent to the conveyor belt to the demarcated 15m servitude.                                                                               | N/A   | This is a construction activity, the EWRP is currently in its operational phase, therefore this condition is not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4.9  | Strip wetland soils separately according to colour and replace in the same order according to the former position in the soil profile to avoid mixing.                                                                  | N/A   | The holder of the authorisation (Thungela) is aware of this condition and the requirements thereof are noted. However, the EWRP is in the operational phase, therefore this condition is applicable in the construction phase.                                                                                                                                                                                                                                                                                                                                                                             |
| 4.10 | Riverbanks over the disturbed areas must be profiled to emulate the adjacent undisturbed slopes and replace topsoil.                                                                                                    | N/A   | The construction phase at EWRP has been finalised and is at its operational phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4.11 | Turbidity and sedimentation downstream of the river and wetland crossing sites must be monitored.                                                                                                                       | C     | EWRP undertake turbidity and sedimentation monitoring through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023).                                                                                                                                                                                                                                                                                                                                                               |
| 5.   | <b>Flora and Fauna</b>                                                                                                                                                                                                  |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 5.1  | All areas to be cleared must be demarcated.                                                                                                                                                                             | N/A   | The construction phase at EWRP has been finalised and is at its operational phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.2  | Replanting activities must be undertaken at the end of a dry season.                                                                                                                                                    | N/A   | The construction phase at EWRP has been finalised and is at its operational phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| NO  | CONDITION                                                                                                                                                                                                                                                               | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.3 | All areas that were planted pasture or natural vegetation before construction must be reseeded.                                                                                                                                                                         | N/A   | The construction phase at EWRP has been finalised and is at its operational phase.                                                                                                                                                                                                                                                                                                                                                                      |
| 5.4 | Remedial action must be carried out where vegetation establishment has not been successful, or erosion is evident.                                                                                                                                                      | N/A   | The construction phase at EWRP has been concluded and is at its operational phase. Therefore, this condition is not applicable.                                                                                                                                                                                                                                                                                                                         |
| 6   | <b>Land Capability, Air Quality and Sensitive Landscapes</b>                                                                                                                                                                                                            |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6.1 | The pipeline must be buried more than 1m below the surface, to ensure that land capability can return to its pre-construction state.                                                                                                                                    | N/A   | The construction phase at EWRP has been concluded and is at its operational phase. Therefore, this condition is not applicable.                                                                                                                                                                                                                                                                                                                         |
| 6.2 | Brine and gypsum must be disposed of separately at suitable sites.                                                                                                                                                                                                      | N/C   | During the site assessment and subsequent discussions held with the Licensee, it was determined that the Brine is disposed of into the Brine Pond only. It was observed that the gypsum that is generated at the EWRP is stockpiled and is sold to the farmers and used as a fertiliser. However, the agreement was not verified during the audit period and the characterisation certificate of gypsum use as a fertiliser was no longer valid.        |
| 6.3 | Dust suppression measures must be implemented on exposed soils and dust generating soils.                                                                                                                                                                               | C     | The EWRP is built on an impervious concrete surface, where all the surface infrastructures are located at. It is highly impossible that dust can be generated, it was thus not found to be an issue during the site assessment.                                                                                                                                                                                                                         |
| 6.4 | Grave sites along the collection and distribution pipeline routes must be avoided.                                                                                                                                                                                      | N/A   | The construction phase at EWRP has been concluded and is at its operational phase. Therefore, this condition is not applicable.                                                                                                                                                                                                                                                                                                                         |
| 6.5 | All alien invasive plants must be removed once a month during the growing season.                                                                                                                                                                                       | N/A   | The construction phase at EWRP has been concluded and is at its operational phase. Therefore, this condition is not applicable.                                                                                                                                                                                                                                                                                                                         |
| 6.6 | The applicant must ensure that All issues and concerns from Interested and Affected Parties are addressed.                                                                                                                                                              | N/A   | The construction phase at EWRP has been concluded and is at its operational phase. Therefore, this condition is not applicable.                                                                                                                                                                                                                                                                                                                         |
| 7   | <b>Monitoring</b>                                                                                                                                                                                                                                                       |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 7.1 | This department will perform random inspections on the site to ensure compliance with the legislation and conditions. The company will be informed of such inspections and must make personnel available to accompany members from this department on such inspections. | N/A   | Condition has been noted by the holder of the authorisation Thungela. Nevertheless, the client is aware that the department may request to conduct an inspection of the EWRP operation.                                                                                                                                                                                                                                                                 |
| 7.2 | Environmental compliance will further be monitored through complaints received from the public.                                                                                                                                                                         | C     | EWRP is in place of the Environmental Incidents and Complaints Procedure, Document No. SS-WTP-PRO-1416 to deal with issues resulting in an environmental complaint from local residents, government bodies, neighbouring farmers, or any other interested and affected parties. Complaints registers are located at Security Checkpoint 1 (visitors' entrance) and the Plant Control Room. Complaints can also be lodged by contacting the SHE Officer. |
| 7.3 | Monitor the wetland characteristics, ecology and erosion throughout the duration of the project.                                                                                                                                                                        | C     | Monitoring of the wetlands, ecology and erosion takes place through the Water quality monitoring procedure (Ref: S29-0265.04 issued December 2012) and a water sampling and monitoring procedure (Ref: SS-WTP-PRO-1644, approved 19 January 2023) and bi-annual biomonitoring reports.                                                                                                                                                                  |
| 7.4 | Regular monitoring must be carried out for localised back flooding upstream of the culverts on the N12, behind the road crossing below the Landau waste rock dump and the crossing at the R554.                                                                         | C     | The bi-annual biomonitoring conducted by Digby Wells 2022 report was made available to NTC for verification at the time of the assessment.                                                                                                                                                                                                                                                                                                              |

| NO  | CONDITION                                                                                                                                                                                                                                                                        | COMPL | FINDING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.5 | This department must be notified within 24 hours in the event of non-compliance with any of the conditions of this authorisation.                                                                                                                                                | C     | EWRP has noted the condition. Evidence of previous reporting of non-conformances to the department within 24 hours, however the audit report was submitted to the department outside of this timeframe that notes all non-conformances. Reporting of the non-conformances observed as part of this audit period will be assessed in the next audit.                                                                                                                                             |
| 7.6 | Records relating to the compliance or non-compliance with the conditions of this authorisation, must be kept in good order. Such records must be made available to this Department within seven (7) workdays from the date of written notice for such records by the Department. | C     | Records from the previous audit are in good order and no requests from the department were received by EWRP for the audit period. EWRP has noted the condition.                                                                                                                                                                                                                                                                                                                                 |
| 7.7 | Non-compliance with or any deviation from the conditions of this authorisation is regarded as an offence, and after reasonable provision has been made for the situation to be remedied, will be dealt with in terms of Section 29, 30 and 31A of the Act.                       | C     | No deviation from the conditions of this authorisation has been made by EWRP.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 7.8 | Any complaints regarding the said development must be thoroughly investigated and addressed to the satisfaction of parties concerned. Copies of such complaints must be forwarded to the department within forty-eight hours of such a complaint being made.                     | C     | EWRP has an Environmental Incidents and Complaints Procedure, Document No. SS-WTP-PRO-1416 to deal with issues resulting in an environmental complaint from local residents, government bodies, neighboring farmers, or any other interested and affected parties. Complaints registers are located at Security Checkpoint 1 (visitors' entrance) and the Plant Control Room. Complaints can also be lodged by contacting the SHE Officer. No complaints were received during the audit period. |

## **5 Deliberations**

### **5.1. Adequacy and compliance of the proposed Emalahleni Water Reclamation Plant Consolidated Environmental Management Programmes**

EWRP Standard Environmental Management Programs/Plans were assessed not only for the EWRP compliance towards the commitments of the respective EMPr, but also assessed for the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the project activities.

#### **5.1.1. Adequacy with the proposed Emalahleni Water Reclamation Plant Consolidated Environmental Management Programme (Dated September 2021)**

Based on the assessment of the proposed Emalahleni Water Reclamation Plant Consolidated EMPr, we are of the opinion that the EMPr sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with the operation of the EWRP and have identified areas for improvement summarized in Section 4 that may facilitate future compliance with EMPR commitments and improve on site environmental management.

#### **5.1.2. Compliance with the proposed Emalahleni Water Reclamation Plant Consolidated Environmental Management Programme (Dated September 2021)**

Non-compliances were identified during the audit for the Emalahleni Water Reclamation Plant Consolidated EMPr Project. Figure 2 illustrates the compliance summary for only the current operational activities that are currently being undertaken onsite as per Section 4 audit findings.

### **5.2. Adequacy and compliance of the proposed Emalahleni Water Reclamation Plant Environmental Authorisations**

Based on the assessment of the proposed Emalahleni Water Reclamation Plant Environmental Authorisation stated herein, we are of the opinion that the EA does not fully sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the operation of the EWRP. All identified areas for improvement noted in Section 4 will facilitate future compliance with the EA commitments and improve on site environmental management.

**5.2.1. Compliance with EWRP Authorisation for the Proposed Construction of a Pipeline from the Water Treatment Plant at Greenside Colliery' to Phola Coal Plant, Dated 8 March 2010 (DEDET Reference No.: 17/2/13NK31)**

Non-compliances were identified during the auditing period of the Environmental Authorizations.

**5.2.2. Compliance with EWRP Authorisation for the EWRP'S Authorisation For the proposed Phase 2 Expansion of the EWRP capacity to treating 50ml (Peaking At 60ml) of Mine Water Daily (Ref: 17/2/2/1(E) MP-5).**

Non-compliances were identified during the auditing period of the Environmental Authorizations. Figure 4 illustrates the compliance summary of Phase 2 Expansion of the EWRP capacity to treating 50ml (Peaking At 60ml) of Mine Water Daily.

**5.2.3. Compliance with EWRP Authorisation for the EWRP'S Authorisation For the proposed Phase 1 (REF: 17/2/12/NK 16 (H06-30))**

Non-compliances were identified during the auditing period of the Environmental Authorizations.

## **6 Conclusion**

According to Regulation 34 under Part 3 of Chapter 5 of the amended Environmental Impact Assessment Regulations, 2014 (Government Notice No. 982) (EIA Regulations, 2014 as amended) state the following i.e.: *"Where the findings of the environmental audit report contemplated in subregulation 1 indicate-*

*(a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or  
(b) insufficient levels of compliance with the environmental authorisation, EMPr or closure plan;  
the holder must, when submitting the environmental audit report to the competent authority in terms of subregulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.*

It is recommended that no-conformances picked up trigger an amendment of the EA's issued. It should be noted that an amendment process is already in place for the EA's and EMPr to align them to current activities. It was determined that selected conditions of the authorisations have editorial inaccuracies and would require amendment to correct the inaccuracies. Furthermore, some conditions are no longer applicable as the site is operational, and technical motivations is provided for removal or re-wording.

Additionally, recommendations for identified areas for improvement have been proposed that may facilitate future compliance with EA and EMPR commitments and improve on site environmental management.

## APPENDIX A: SITE VISIT REGISTER

|                                                                                                                 |                                                                                              |                         |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------|
| NTC Group (Pty) Ltd<br>AMP Building,<br>17 Eaton Avenue, Bryanston<br>2191                                      |  NTC Group |                         |
| Tel: 011 482 2022<br>Fax: 0866 928 639<br>Email: <a href="mailto:ethel@ntcgroup.co.za">ethel@ntcgroup.co.za</a> | Enquiries:                                                                                   | Ethel Chifunda          |
|                                                                                                                 | Date of Meeting:                                                                             | 09 MARCH 2023 (08:00am) |
|                                                                                                                 | Venue:                                                                                       | EWRP (EMALAHLENI)       |

### MEETING: EWRP ENVIRONMENTAL COMPLIANCE AUDIT

#### ATTENDANCE REGISTER

| Person            | Organisation   | E-mail Address                  | Cell phone   |
|-------------------|----------------|---------------------------------|--------------|
| Iman Dams         | PinSent Maseng | Iman.Dams@pinSentMaseng.com     | 084 552 7170 |
| Sarah Burford     | PinSent Maseng | Sarah.Burford@pinSentMaseng.com | 067 4184030  |
| Adam Gunn         | PinSent Maseng | Adam.Gunn@pinSentMaseng.com     | 072 533 4399 |
| Bongeko Madib     | Thungela       | Bongeko.Madib@thungela.com      | 0132151392   |
| Shenelle Emmanuel | Thungela       | Shenelle.emmanuel@thungela.com  | 0840583310   |

AUDIT MEETING

| Person           | Organisation | E-mail Address          | Cell phone   |
|------------------|--------------|-------------------------|--------------|
| Kononani Nkwishi | NTC          | kononani@ntcgroup.co.za | 0763910857   |
| Ethel Chifunda   | NTC          | ethel@ntcgroup.co.za    | 066 239 6094 |
| Anela Solashe    | NTC          | anela@ntcgroup.co.za    | 0640533208   |
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## APPENDIX B: PHOTOGRAPHIC EVIDENCE

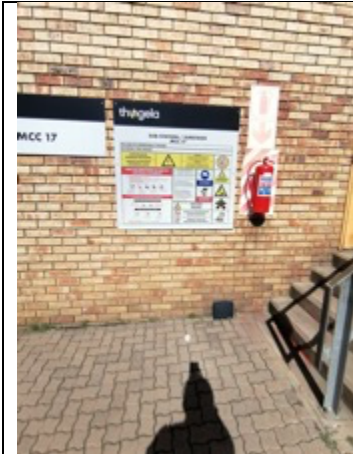


Photo 1: Example of non-reflective building and hazard signage



Photo 2: Example of SCADA system



Photo 3: Un-serviced Fire Extinguisher



Photo 4: Security Access



Photo 5: AMD pond

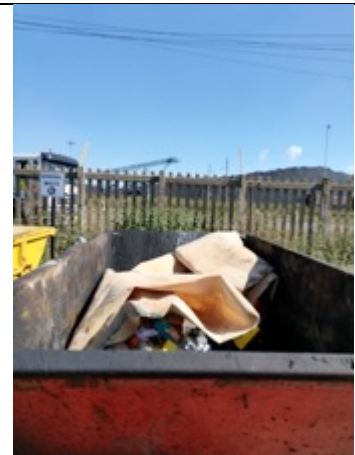


Photo 6: Mixing of waste streams



Photo 7: Storage of waste on bare ground.



Photo 8: Speed Limit

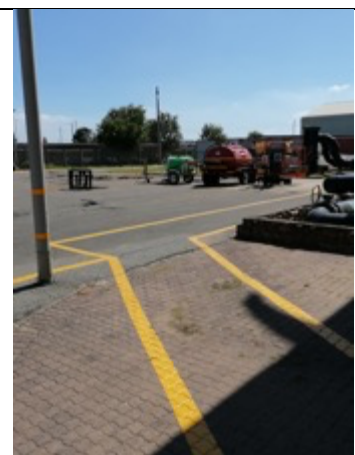


Photo 9: Designated Fuel storage area



Photo 10: Example of chemical storage bunded area.



Photo 11: Example of warning signage (Do not drink).



Photo 12: Example of gabions



Photo 13: Example of V-trench



Photo 14: Gypsum Storage area



Photo 15: Unlabelled and/ or damaged labelling, Mixing of waste



Photo 16: Sump



Photo 17: Maintenance Work



Photo 18: Maintenance Work