



GOEDEHOOP COLLIERY BULFONTEIN EXTENSION

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)

DMRE Reference No: MP 30/5/1/2/2/122 MR

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0.4	November 2023	Authorise	Dolly Mthethwa Willencha Snyders

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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
EO	Environmental Officer
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMC	Environmental Management/Monitoring Committee
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
SABS	South African Bureau of Standards
SLP	Social Labour Plan

1. Introduction

1.1 Background

Goedehoop Colliery is a member Thungela Operations (Pty) Ltd situated approximately 15 to 25 km south-east of eMalahleni, Mpumalanga Province, and is one of the largest mining complexes in Mpumalanga as depicted in Figure 1. Goedehoop comprises the Goedehoop North (GHN) and Goedehoop South (GHS) sections. GHN has a remaining life-of-mine (LoM) of approximately two years (2024). Goedehoop Colliery has an existing mining licence (Licence Number 32/94) under section 9(1) of the Minerals Act (Act 50 of 1991) to mine coal on the various farms as depicted on the Mining Licence and within the current approved Goedehoop Colliery EMPR (Report Number 296/2003). A Mining Licence (23/2003) was issued to Goedehoop Colliery to mine coal situated on Ptn 1, MA3 on RE Ptn 3, portion of MA5 on RE of Ptn 6, 10, 12, 13 (a Ptn of Ptn 9) and Ptn 14 (a Ptn of Ptn 6) of the farm Bultfontein 187 IS encompassing an area of 482.73 ha.

Goedehoop Colliery comprises of two (2) sections namely the Goedehoop North Section (previously known as Bank Colliery) and Goedehoop South Section (previously known as Goedehoop Colliery), operated under mining rights with Department of Mineral Resources and Energy (“DMRE”) reference numbers MP 30/5/1/2/2/ 143) MR and MP 30/5/1/2/2/1 (122) MR, respectively and approved Environmental Management Programmes (“EMPr”) in terms of the largely repealed Section 39 (6) of the Mineral and Petroleum Resources Development Act, 2002 (“MPRDA”).

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 components of Goedehoop Colliery South to commence are authorized as follows:

Environmental Management Programme (EMPr)

- Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 (DMRE Reference number MP 30/5/1/2/2/122 MR).

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

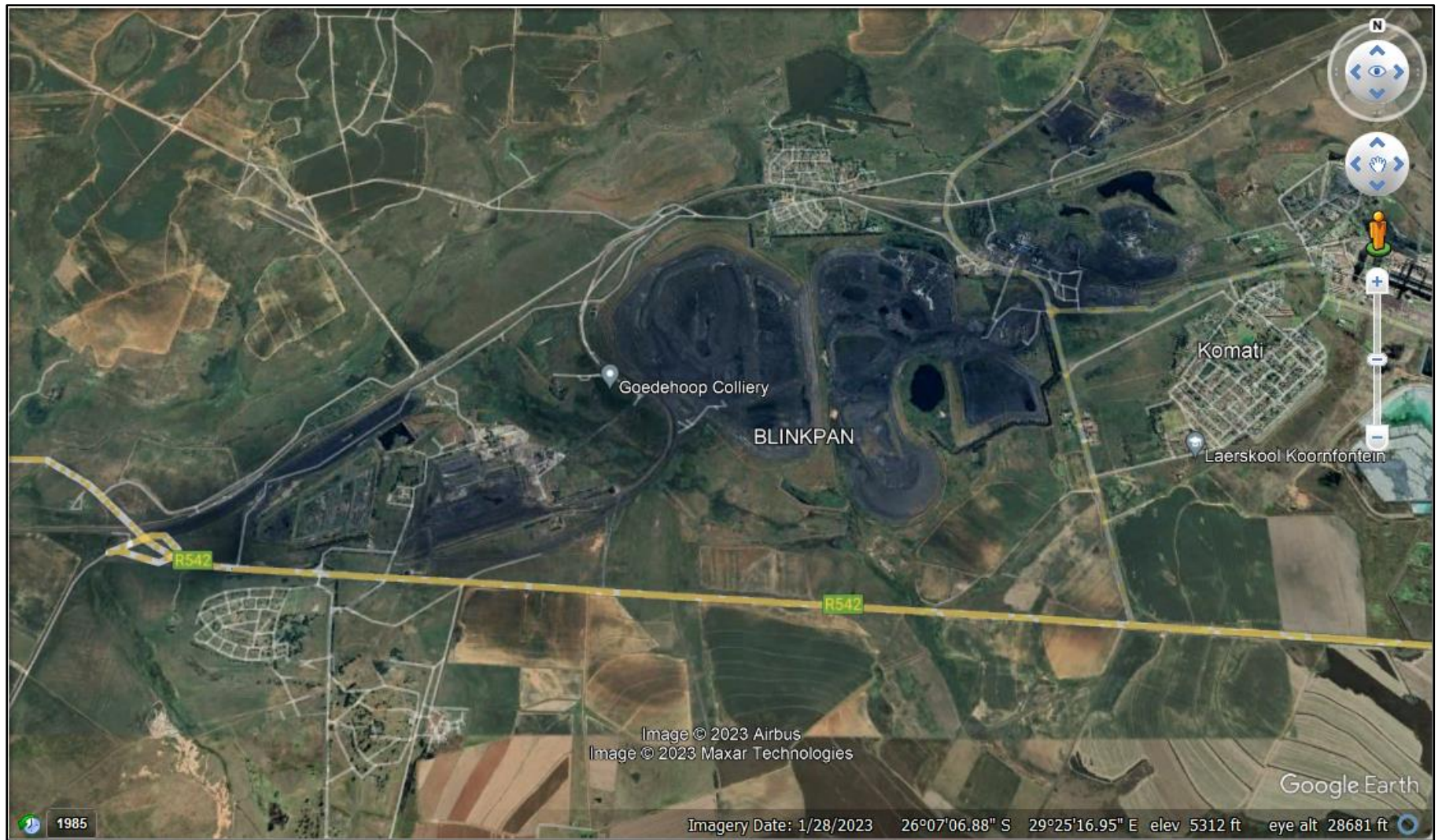


Figure 1: Geodehoop Colliery Project Location (Google Earth, 2023)

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 Goedehoop Colliery South were assessed and include:

As a result of the above, the 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. Following from the above, compliance assessments on the approved Environmental Management Programmes for Goedehoop Colliery were assessed and include:

- Environmental Management Programme issued in terms of the National Environmental Management Act, 1998 (NEMA) as amended for the proposed Goedehoop mining activities and associated infrastructure that has been granted.

The compliance assessments on the approved EMPr as stated above for Goedehoop Colliery were assessed and findings are detailed in table 1.

1.3 Assumptions and Limitations

The scope of the compliance assessment was to assess the environmental management practices being implemented during operation of the Goedehoop Colliery Bultfontein Extension, 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 Goedehoop Colliery Bultfontein Extension 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 Goedehoop Colliery Bultfontein Extension operation, and the audit period assessed includes August 2022 – August 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.
- Goedehoop Colliery Bultfontein Extension is under operation 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 Goedehoop Colliery Bultfontein Extension 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 (Curriculum Vitae and Declaration of Independence attached in Appendix B).

TABLE 1: AUDIT TEAM CONTACT DETAILS

Role	Responsible Person	Contact Details
Quality Control	Tebogo Mapinga (Pr. Sci. Nat) is an Environmental Auditor (Peer Reviewer) at NTC Group (Pty) Ltd. She has over 16 years' experience in the Environmental Management field including extensive experience within the mining sector. Goodness provided quality assurance during the audit preparations and report compilations.	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: tebogo@ntcgroup.co.za
Auditor	Ethel Chifunda (MSc) is a Principal Consultant at NTC Group (Pty) Ltd. She has over 4 years' experience in the Environmental Management field including extensive experience 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
		Fax: +27 86 665 1864
		Email: ethel@ntcgroup.co.za
Auditor	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
		Email: konanani@ntcgroup.co.za
Auditor	Jessica Morwasehla is the Environmental Scientist at NTC Group (Pty) Ltd. She has over 5 years' experience in the Environmental Management field including extensive experience within the mining	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: jessica@ntcgroup.co.za

Role	Responsible Person	Contact Details
	sector. Authorisations and undertook the audit preparations, site assessment, as well as compilation of the audit report.	

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*:

- Approval of EMP_Kleinfontein, Ref (MP) 30/5/1/2/3/2/1 (466) EM, date 16 May 2019, Department of Mineral Resources.
- GHS 122MR EMPR Amendment DMR Approval October 2021, Ref (MP) 30/5/1/2/3/2/1 (122) EM, date 13 October 2021 Department of Mineral Resources.
- Goedeheop Colliery Bultfontein Extension EIA EMP, Ref MP 30/5/1/2/2/122 MR, date November 2012
- Goedeheop Colliery FINAL Amended MPRDA EIA EMP Report, Ref MP 30/5/1/2/2/1 (124), date August 2014.
- Goedeheop_OT532613_VanDyksdrift_EMPR_DMESTamped, (MP) 30/5/1/2/3/2/1, date 24 April 2008
- Revised EIA and EMP, Ref MP 30/5/1/2/2/466 MR, date January 2011
- Approved Block 20 IWUL Renewal, Ref 06/B11B/GICAJ/5339, date 05 June 2017
- GHS Discard Plant GA approval, Ref 27/2/2/B211/32/3/, date 01 September 2021
- GHS IWULA May 2013, Ref 04/B11B/ACFGIJ/1754, date 08 May 2013
- Exemption IWUL GHS undermining water courses 2018, Exemption no: 27/2/2/B11G/254, date 05/ July 2018.
- Appendix A TOPL Amended Registration Certificate Cor14.3
- Appendix B FAQ
- Draft Agenda, Upper Olifants Catchment Management Forum Meeting, 16 May 2023
- Minutes of the meeting-Upper Olifants Catchment Management Forum Meeting Draft Agenda 16 May 2023,
- DWS Acknowledge of receipt, Goedeheop Internal Integrated Water Use License Audit Report, received by Betty Mnguni, 22 November 2022
- DWS Goedeheop DWS Permits Schedule March 2022 Final for Signature,

- DWS Thungela - AOPL Letter Head_Penstock Letter DWS March 2022 Final For Signature, signature by Leonore van Wyk.
- DWS Acknowledge of receipt, Goedehoop Colliery Quarterly Water Quality Assessment Report January 2022 – March 2022, received by Betty Mnguni, 22 June 2022.
- Final Signed Change of Name Notification of Anglo Operations (Pty) Ltd_DMRE Mpumalanga Emalahleni_March 2022_Phase 2, by Leonore van Wyk, March 2022.
- Final Signed Change of Name Notification of Anglo Operations (Pty) Ltd_DMRE Pretoria_March 2022_Phase 2, Leonore van Wyk, March 2022.
- GH Quarterly WQ Report Submission cover letter, Eugene Moremi, 13 September 2022.
- Name Change FAQs_NEW v3
- RE Submission WQ report annual+ Biomonitoring report, by Willencha Snyders, 2022/04/29
- Invitation to attend Upper Olifants Catchment Management Forum, by Mpumalanga DWS, letter dated 26 October 2022,
- Upper Olifants catchment management forum meeting agenda 22 November 2022
- Upper Olifants attendance register 15 September 2022
- Draft minutes of the Upper Olifants catchment forum meeting, 15 September 2022
- Upper Olifants Catchment Management Forum meeting invite, 17/04/2023, Mpumalanga DWS
- 2021 - 2023 Incidents & Grievances Report
- Goedehoop Colliery (South) Bultfontein Extension Regulation 34 Audit Report, Ref No: 4139/2022, compiled by Geovicon Environmental (Pty) Limited, 05 December 2022.
- Goedehoop Colliery (South) Bultfontein Extension Regulation 34 Audit Report, Ref No: 4140/2022, compiled by Geovicon Environmental (Pty) Limited, 05 December 2022.
- Goedehoop Colliery (South) Main Regulation 34 Audit Report, Ref No: 4138/2022, compiled by Geovicon Environmental (Pty) Limited, 05 December 2022.
- Goedehoop Colliery (South) Van Dykdrift Regulation 34 Audit Report, Ref No: 4141/2022, compiled by Geovicon Environmental (Pty) Limited, 05 December 2022.
- Proof of submission to DMRE - Thungela Reg34 audit reports 2022, submitted by OT Shakwane, 06 December 2022
- Safety Data Sheet – Acetylene, SDS Number: 001, Acetylene / Rev 3 / 2016-03
- Safety Data Sheet – Nitrogen, SDS Number: 089A, Nitrogen / Rev 3 / 2016-03
- Safety Data Sheet – Oxygen, SDS Number: 097A, Oxygen / Rev 3 / 2016-03
- Bank_ML271994_Annexure_F_EMP_Main_v1, Environmental Management Programme Report, Ref OT 6/2/2/133, dated 30/05/2005
- Bank_ML271994_Annexure_F_EMP_Main_v2, Environmental Management Programme Report, Appendices
- Brown II EMP Amendement Approval 03 September 2019, Mpumalanga DMRE.
- EMPR Addendum: Roodepoort-Welverdiend (Bank), Ref MP 30/5/1/2/2/57 MR, compiled by Anglo Coal, 25 August 2005.
- List of Goedehoop Colliery EMPRs

- Bank Approved WUL Amendment, licence no 04/B11H/AFGJ/633, 16/04/2021, Department of Water and Sanitation
- Bank Water Use License, Department of Water Affairs, 18/07/2021, licence no 04/B11H/AFGJ/633
- Brown 2 IWUL Approval , 29 March 2016, Licence no 04/B11H/ACGIJ/4329, Department of Water and Sanitation.
- EA public notice, sent by Geovicon Environmental (Pty) Ltd, 27 October 2021
- GH_ MRD Extension,Water Use Licence, licence no 06/B11H/CGI/9286, 08/06/2022, Department of Water and Sanitation
- IWUL GHS undermining water courses 2018, 05/07/2018, Department of Water and Sanitation, Exemption no 27/2/2/B11G/257
- Thungela GA letter, Department of Water and Sanitation, Ref no:27/2/2/BB11/19/3 (B14067), 29 June 2023
- Thungela Operations registered water use, Ref Ref no:27/2/2/BB11/19/3,(B13378), 11 December 2022
- Goedehoop Colliery Annual Water Quality Assessment Report, January 2022 to December 2022 Report Number: GC/AR/2022/IF, date 24th January 2022, prepared by Aquatico Scientific.
- Goedehoop Colliery Fire Risk Assessment Report 2022,
- Belt Attendent, Measurement Report, date: 2/22/2023
- CM Operator, Measurement Report, date: 2/22/2023
- Faceboss Section 3, Measurement Report, date: 2/22/2023
- Faceboss Section 4, Measurement Report, date: 2/22/2023
- Fitter Roving underground, Measurement Report, date: 3/06/2023
- Faceboss Prime 2, Measurement Report, date: 2/22/2023
- CM Operator Prime 2, Measurement Report, date: 2/22/2023.
- Shuttle Car Operator Prime 2, Measurement Report, date: 2/22/2023
- Shuttle Car Operator Section 9, Measurement Report, date: 2/22/2023
- Roof Bolter Section 9, Measurement Report, date: 2/22/2023
- Shuttle Car Operator Section 4, Measurement Report, date: 2/22/2023
- Washing Plant, Measurement Report, date: 2/22/2023
- Goedehoop Colliery DMR Report Annual Noise
- Drain-,Silt and Oil Trap Maintenance and Clean Up Procedures, Ref:GOE-ENV-PRO-0114, prepared by Willenchia Snyders, date 05/09/2022
- Hazardous Chemicals Management Procedure, Ref:OE-ENG-PRO-0787, prepared by Britz Amke, date 22/08/2022
- Petroleum and chemical product spill and control procedure_2022, Ref:GOE-ENV-PRO-1237, prepared by Willenchia Snyders, date 05/09/2022

- Site rehabilitation topsoil stripping and management procedure, Ref: GOE-ENV-PRO-1279, prepared by Axsel Maruschka, date 03/09/2022
- Vegetation Establishment Maintenance Procedure prepared by Axsel Maruschka, date 31/08/2022
- Waste Management Standard, Ref: 009970, prepared by Axsel Maruschka, date 17/08/2022
- Water Management Procedure, Ref: GOE-ENV-PRO-1407, prepared by Axsel Maruschka, date 02/06/2022
- Environmental Inspection Report – June 2022
- Environmental Inspections: Andru Mining and Bank 2 Plant, 10 May 2023
- Environmental Inspection 13 July 2023
- Environmental Inspection- March 2022
- Environmental Inspections 26 April 2023
- Environmental Inspections, Simunye Shaft – Surface area, 09 November 2022
- Emergency Organogram
- Water Management Procedure, Ref: GOE-ENV-PRO-1228, prepared by Axsel Maruschka, date 17/08/2022
- Environmental Incident and Non-Conformance Reporting Procedure, Ref: GOE-ENV-PRO-1277, prepared by Axsel Maruschka, date 03/09/2022
- Communication Participation and Consultation Procedure, Ref: GOE-ENV-PRO-1280, prepared by Willenchia Snyders, date 19/01/2023
- Mine Closure Plan for Goedeheop Colliery, prepared by WSP Group Africa (Pty) Ltd, Ref:41105407, date December 2022
- Infrastructure Plan_GH South
- Thungela Coal Discards Disposal Operating Contract meeting, 07 March 2023, Quarterly inspection Meeting
- Thungela Coal Discards Disposal Operating Contract meeting, 13 June 2023, GHN Quarterly inspection Meeting.
- Report-Bank - 27 January 2022 retest, Ref no: WAT 6001 / 2022 (138), prepared by Watco Consulting
- 22-1734-ECOI-PM Thungela Goedeheop AQM - March 2023 Ver.00, prepared by Eco Elementum (Pty) Ltd
- 2 2-1734-ECOI-PM Thungela Goedeheop AQM - June 2023 Ver.00, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-PM Thungela Goedeheop AQM_Ver.00, February 2023, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-PM Thungela Goedeheop node ALL AQM (Apr 23) Ver.00, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-PM Thungela Goedeheop node ALL AQM (Apr 23) Ver.01, prepared by Eco Elementum (Pty) Ltd

- 22-1734-ECOI-PM Thungela Goedeheop node ALL AQM (May 23) Ver.00, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-PM-Thungela-Goedeheop Colliery AQM (Dec-22) Ver.00, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-PM-Thungela-Goedeheop Colliery AQM (Jan-22) Ver.AA, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-Thungela-Goedeheop Colliery Air Quality Monitoring (Jan-23) Ver.0.0, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-Thungela-Goedeheop Colliery AQM Feb-23 (Jan-23 Sampling Period) Ver.0.0, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-Thungela-Goedeheop Colliery AQM July-23 (June-23 Sampling Period) Ver.0.0, prepared by Eco Elementum (Pty) Ltd
- 22-1734-ECOI-Thungela-Goedeheop Colliery AQM June-23 (May-23 Sampling Period) Ver.0.0, prepared by Eco Elementum (Pty) Ltd
- 22-1848-ECOI (Thungela Goedeheop Colliery AQMP) Ver02, prepared by Eco Elementum (Pty) Ltd
- Nasonti Dust Report - June 2023, Dust Fall-out Monitoring Report, compiled by Aquatico Scientific
- Nasonti Dust Report - May 2023, Dust Fall-out Monitoring Report, compiled by Aquatico Scientific
- Safe Operating Manual procedure for Bank 2 Sewage treatments plant, prepared by Licebo Environmental and Mining (Pty) Ltd
- Safe Operating Manual procedure for Bank 5 Water treatment works, prepared by Licebo Environmental and Mining (Pty) Ltd
- Bank Water Treatment Plant and Sewerage treatment Plant Summary Report Jan 2023, prepared by Licebo Environmental and Mining (Pty) Ltd
- General Disposal Certificate and Tax Invoice, Ref no:180328, date 15/06/2023
- General Disposal Certificate and Tax Invoice, Ref no:180347, date 12/07/2023
- General Disposal Certificate and Tax Invoice, Ref no:180310, date 18/05/2023
- BME Waste License, Licence no: 12/09/11/L601/06, date 20/03/2012, Department of Environmental Affairs
- Collector Copy and Tax Invoices, Ref 106634, date 02/07/2022
- Komane Drums Recycling, Ref:19/7/3/11
- RF_Registered_Collecter_Certificate 2023
- Goedeheop Oil Collected July 2023
- Goedeheop Oil Collected June 2023
- Goedeheop Oil Collected
- Goedeheop Scrap Metal Collected, 20 January 2023
- Goedeheop Scrap Metal Collected, 19 January 2023

- Goedehoop Scrap Metal Weighbridge Recons, January 2023
- Goedehoop Scrap Metal Weighbridge Recons, February 2023
- Goedehoop Scrap Metal Weighbridge Recons, June 2023
- Safe Disposal Certificate, 2023/01/16, Ref: 22102100080002665908, T L Ideas Trading
- Safe Disposal Certificate, 2023/01/26, Ref: 22102100080002665909, T L Ideas Trading
- Safe Disposal Certificate, 2023/02/01, Ref: 22102100080002665910, T L Ideas Trading
- Safe Disposal Certificate, 2023/02/01, Ref: 22110300100002675663, T L Ideas Trading
- Safe Disposal Certificate, 2023/02/01, Ref: 22102100080002675663, T L Ideas Trading
- Annual Update Integrated Water and Waste Management Plan, Ref no: 042223PHILOGHNORTHIIWWMP-2022 Ver1.1 November 2022, prepared by Philo Environmental Management
- Annual Update Rehabilitation Strategy and Implementation Programme, Ref: 042223PhiloGHNRSIP, October 2022, prepared by Philo Environmental Management
- Annual Update Integrated Water and Waste Management Plan, Ref no: 042223PHILOGDHSOUTHIIWWMP-2022 Ver1.1, December 2022, prepared by Philo Environmental Management
- Annual Update Rehabilitation Strategy and Implementation Programme, Ref: 042223PHILOGHSOUTHR SIP-2022 Ver1.1, December 2022, prepared by Philo Environmental Management
- Calibration Certificate Submersive 1 Flow, Ref no: FV3310RN0, date 31 March 2023
- Calibration Certificate Simunye Ericson Dam Flow Meter, Ref no: FV33167T2, date 31 March 2023
- Calibration Certificate Bankfontein to Plant - Flow 2, Ref no: FV3313KV8, date 31 March 2023
- Goedehoop North and South Collieries Aquatic Biomonitoring High & Low Flow 2021 Komati, Mpumalanga January 2022, prepared by The Biodiversity Company
- Annual Water Quality Assessment Report January 2022 to December 2022, Ref: GC/AR/2022/IF, 24 January 2022, prepared by Aquatico Scientific.
- Annual Water Quality Assessment Report January 2023 to December 2023, Ref: GC/QR1/2023/EG, May 2023, prepared by Aquatico Scientific.
- Goedehoop_Groundwater_Model Report_Aug2023 FinalDraft-v5, Ref: Delh.2022.003-4G, August 2023, prepared by Delta-h Water System Modelling
- Surface water Quality Report, Compiled by Aquatico Scientific, June 2023
- Surface water Quality Report, Compiled by Aquatico Scientific, May 2023
- Service Report, Ref :4407102434, date 29/03/2023
- Goedehoop Colliery General Waste 1 June 2023, Ref 0011
- Goedehoop Colliery General Waste 7 March 2023, Ref 2741
- Goedehoop Colliery General Waste 22 June 2023, Ref 0012
- Goedehoop Colliery General Waste 22 June 2023, Ref 0013
- Goedehoop Colliery General Waste 23 June 2023, Ref 0014

- Goedehoop Colliery General Waste 24 March 2023, Ref 2749
- Goedehoop Colliery General Waste 27 June 2023, Ref 0015
- Goedehoop Colliery General Waste 28 March 2023, Ref 2737
- Goedehoop Colliery General Waste 29 June 2023, Ref 0016
- Goedehoop Colliery General Waste 30 March 2023, Ref 3036
- Goedehoop Colliery Hazardous Waste 23 June 2023, Ref 007
- Goedehoop Hazardous Waste 29 June 2023, Ref 008
- Goedehoop Colliery Rubber Waste 29 June 2023, Ref 009
- Goedehoop Colliery General Waste 10 January 2023 (4), Ref 2832
- Goedehoop Colliery General Waste 13 January 2023 (4), Ref 2718
- Goedehoop Colliery General Waste 17 January 2023 (3), Ref 2820
- Goedehoop Colliery General Waste 20 January 2023 (4), Ref 2855
- Goedehoop Colliery General Waste 31 January 2023 (3), Ref 2866
- Goedehoop Colliery Hazardous Waste 13 January 2023 (4), Ref 2719
- Goedehoop Colliery Hazardous Waste 20 January 2023 (4), Ref 2856
- Goedehoop Colliery Hazardous Waste 31 January 2023 (4), Ref 2867
- Goedehoop Colliery Rubber Waste 13 January 2023 (3), Ref 2720
- Goedehoop Colliery Rubber Waste 20 January 2023 (3), Ref 2857
- Goedehoop Waste Management Report, June 2023 Report

3.2 Site Verification

The site assessment and document review were completed on 16th of August 2023 to 18th of August 2023 by Konanani Nelushi (NTC), Ethel Chifunda (NTC), Jessica Morwawasehla (NTC), Avhadali Matambela (NTC), Dolly Mthethwa (Thungela), Willencha Synders (Thungela), Sarah Burford (Pinset), and Christin Kleingeld (Pinsent Masons); and others (refer to Appendix B: Attendance Register for a detailed list). During the site assessment, additional documents were collated, and information was verified, Goedehoop Colliery personnel were interviewed and selected areas were visited i.e., verified using photographic evidence presented in Appendix C: Photo Plate.

3.3 Assessment Methodology

NTC assessed each of the operational and decommissioning Environmental Management Programme conditions per the criteria provided in the table below:

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 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
Compliant	C	Full Compliance is when the construction or operational activities comply with the EMP conditions. No mitigation measures are required where operations comply and are adequate.
Non-Compliant	NC	Non-Compliance is when construction or operational activities are in contravention with the 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.
Not Applicable	N/A	Not Applicable is assigned to EMP 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.

TABLE 3: GOEDEHOOP COLLIERY BULTFONTEIN EXTENSION ALIGNED ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME (REFERENCE NUMBER (MP 30/5/1/2/2/ (122) MR).

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
Operational Phase				
6.2.1	Geology	No measures can be implemented to manage the impact associated with the removal of the coal seams.	N/A	Condition has been noted by the holder.
6.2.2	Topography	In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken: - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023). However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states, "The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
		Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: - The fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to the surface surroundings using a minimum 300mm layer of topsoil.	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states,"The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
6.2.3	Soil	In the event that surface subsidence occurs on the mined-out areas, the following actions will be undertake: - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states, "The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
		Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: - The fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). The areas will be finally shaped, covered and seeded to conform to the surface surroundings using a minimum 300mm layer of topsoil.	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023). However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur.
6.2.4	Land Capability	In the event that surface subsidence occurs on the mined-out areas, the following actions will be undertake: - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur.

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
				Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states,"The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
		Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: ▪ The fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300mm topsoil separately) ▪ Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). The areas will be finally shaped, covered and seeded to conform to the surface surroundings using a minimum 300mm layer of topsoil.	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: ▪ Areas identified are fenced off to prevent access to the areas. ▪ Signs are erected to warn people of the dangers associated with the areas. ▪ The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. ▪ Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states,"The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
6.2.5	Land Use	In the event that surface subsidence occurs on the mined-out areas, the following actions will be undertake: ▪ Topsoil will be stripped to a minimum depth of 300 mm over the affected area. ▪ The affected area will be shaped to be free draining. The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: ▪ Areas identified are fenced off to prevent access to the areas. ▪ Signs are erected to warn people of the dangers associated with the areas. ▪ The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. ▪ Once the area has stabilised, backfilling, levelling and rehabilitation will occur.
		Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: ▪ The fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300mm topsoil separately) ▪ Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). The areas will be finally shaped, covered and seeded to conform to the surface surroundings using a minimum 300mm layer of topsoil.	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: ▪ Areas identified are fenced off to prevent access to the areas. ▪ Signs are erected to warn people of the dangers associated with the areas.

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
				- The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states,"The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
6.2.6	Natural Vegetation	In the event that surface subsidence occurs on the mined-out areas, the following actions will be undertake: - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states,"The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".
		Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: - The fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). The areas will be finally shaped, covered and seeded to conform to the surface surroundings using a minimum 300mm layer of topsoil.	N/A	There are no sinkholes and/or subsidence identified during this audit period as per the incident's register provided for review (19th of January 2021 – 14th of June 2023); however, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine then reviews all mine plans to determine if the area of subsidence in question corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft is opened, backfilled, levelled and reshaped. Should the area of subsidence correspond with underground workings the following procedure if followed: - Areas identified are fenced off to prevent access to the areas. - Signs are erected to warn people of the dangers associated with the areas. - The extent of identified subsidence areas is evaluated on an annual basis as part of the annual subsidence fly over to determine whether the subsidence has stabilised. - Once the area has stabilised, backfilling, levelling and rehabilitation will occur. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states," The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised".

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
6.2.7	Animal Life	Note that due to the previous grazing, crop production and mining land use, no significant animal populations occur on the Goedeheop Colliery Bultfontein Extension, thus no significant impacts were predicted. No mitigation measures will be undertaken during the operational phase.	N/A	Condition has been noted by the holder and the auditor.
6.2.8	Surface Water	The actions described in section 6.2. 2 and 6.2.3 will ensure that the impacts that may occur on the surface water regime are minimised and or prevented.	N/A	Condition has been noted by the holder. Condition 6.2.2 and 6.2.3 above refers.
6.2.9	Groundwater	Underground: Mined out sections will be sealed off as soon as the sections is abandoned. The above will ensure that the areas are devoid of free oxygen hence reducing the ability of the pyrite to oxidize thus forming acid mine drainage.	C	During the site assessment, the auditors observed that no carbonaceous stockpile was noted on site. It was also reported that the Goedeheop Colliery rehabilitation progress sits at over 75 percent. Open pit mining at Goedeheop is complete, and all open pits have been rehabilitated. The mine is now solely an underground operation
		Monitor ground and surface water around the affected areas to determine if there if any plume and if so, far how fast, far and the direction of the migration of the plume. This will further determine if decant is taking place.	C	The auditors verified the Goedeheop Colliery Update of the Geohydrological and Geochemical Model dated August 2023, compiled by Delta H Water Systems Modelling. The report details the extent pollution plume and location of monitoring boreholes.
6.2.10	Air Quality	No impact is predicted or will occur on the ambient air quality due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	N/A	Condition has been noted by the holder of EMPr and the auditor.
6.2.11	Sensitive Landscape	No impact is predicted or will occur on the ambient air quality due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.		Condition has been noted by the holder of EMPr and the auditor.
6.2.12	Noise Vibration	No impact is predicted or will occur due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.		Condition has been noted by the holder of EMPr and the auditor.
6.2.13	Visual Aspect	No impact is predicted due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.		Condition has been noted by the holder of EMPr and the auditor.
6.2.14	Socio-Economic Impacts	Goedeheop Colliery has a positive impact on the region's economic welfare, due to the creation of employment and need for supporting industries. No management is necessary.	C	The auditors observed that Goedeheop Colliery offers not only employment in the surrounding local dwellers but also support the regional economy. The auditors noted that the Goedeheop donated two (2) mobile clinics to Mpumalanga Department of Health. The investment in two (2) mobile clinics that will deliver vital health services to people living in the remote rural areas.
		Goedeheop Colliery is actively involved in community development projects including the development of small-scale farming by providing landlords (on property owned by Anglo Operations Limited).	C	During the audit, Goedeheop Colliery Rehabilitation Specialist indicated that some portions of land under rehabilitation was leased to local farmers to undertake rehabilitation on their own. These rehabilitated areas will be used as grazing land for farmers livestock.
6.2.15	Interested and Affected Parties	Goedeheop Colliery will ensure genial relationships with Interested and Affected parties by: a) Recording all complaints received in complaints register, to be kept at the mine.	C	Auditors verified complaint and grievance registers dated (19 th of January 2021 – 14 th of June 2023). All complaints were recorded in the register.
		b) Interested and affected party meetings will be held on a six-monthly basis. An attendance registers and minutes of the meetings will be taken.	NC	No proof that interested and affected parties' meetings was held on a six-monthly basis as per the condition request. No attendance registers and minutes were verified. It was reported that no farmers meeting was held in 2022.
		c) Keeping and making available all minutes of any meetings between Goedeheop Colliery and Interested and Affected parties.	NC	Condition above refers.
		d) Keeping an up-to-date list of I&AP's.	NC	There was no up-to-date list of interested and affected parties that was verified during the audit. Condition above refers.
6.2.16	Historical and Cultural Aspects	No impact is predicted or will occur on cultural aspects due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	N/A	Condition has been noted by the holder and the auditor.

Ref No	Objective	Mitigation Measures (Action)	Compl	Finding
Decommissioning and Closure				
6.3.1	Environmental, Social and Cultural Impact Assessment	Impacts of all aspects identified during the operational phase will continue during the decommissioning phase, hence all mitigation and environmental management programmes planned for the operational phase will be continued throughout the decommissioning phase. No significant additional impacts are predicted to occur during the decommissioning phase. No additional mitigation measures will be necessary.	N/A	Condition has been noted by the holder and the auditor.
6.3.2	Ongoing Seepage Control	The flow in the coal seam will be directed towards the underground mining area during this stage of mining and pumped to the surface. The exposed coal will thus not be flooded, and very little groundwater pollution is expected. Some groundwater pollution might take place during this stage if smaller abandoned mining areas are allowed to flood. However, with the main flow directed towards the mining area, the effect of such pollution is expected to be small. As the elevation of the river is above the coal seam, there is little chance that decanting will occur from the underground workings during mining.	N/A	No decanting from the underground workings were observed or reported during the audit period.
	Long Term Stability	The use of a proper safety factors for the remaining pillars will ensure that the overlying strata maintain a long-term stability. No surface subsidence is therefore expected, and the area will remain free draining.	C	Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme dated November 2012 compiled by Geovicon cc, states, "The coal seam that is to be impacted upon is the No 2 coal seam within the Hope section. Note that approximately 70% of the coal within the Bultfontein extension area will be removed. The remainder will be left as pillars to ensure that the overlying strata remain intact, and thus the possibility of surface subsidence is minimised". No subsidence was noted during inspection.
	Final Land Use	To manage the effects of the mining activity on the environment using the principle of BAT such that, on attaining closure, the mining area will have been restored to a condition which approximates pre-mining conditions or such that it is suitable or safe for agricultural and or wilderness use.	N/A	Goedehoop Colliery South Bultfontein Extension is an underground mine and no surface restoration is required.

5 Deliberations

5.1. Adequacy and compliance of the Goedehoop Colliery Bultfontein Extension Environmental Management Programme

Goedehoop Colliery Bultfontein Extension Environmental Management Plan was assessed not only for the Goedehoop Colliery 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.

5.2. 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.*

This external audit was undertaken in accordance with the requirements of Regulations 34 and 54A of the amended 2014 EIA Regulations. This audit report meets the regulatory content requirements. The audit did not identify insufficient mitigation of environmental impacts associated with the activities at Goedehoop Colliery Bultfontein Extension any impacts or risks associated with the facility that were not considered in the EIA.

APPENDIX A: DECLARATION OF INDEPENDENCE

The Environmental Assessment Practitioner General declaration:

I, Konanani Nelushi, 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: December 2023

APPENDIX B: Attendance Register

NTC Group (Pty) Ltd AMP Building, 17 Eaton Avenue, Bryanston 2191		
Tel: 011 462 2022 Fax: 0866 928 639 Email: konanani@ntcgroup.co.za	Enquiries:	Konanani Nelushi
	Date of Meeting:	16 August-18 August 2023 (08:00am)
	Venue:	Goedehoop Colliery Site

MEETING: GOEDEHOOP COLLIERY ENVIRONMENTAL COMPLIANCE AUDIT

ATTENDANCE REGISTER

Person	Organisation	E-mail Address	Cell phone
Konanani Nelushi	NTC Group		
Ethel Chifunda	NTC Group		
Avhadali Matambela	NTC Group		
Jessica Morwasehla	NTC Group		
Sarah Burford	Pinsent Masons		
Christin Kleingeld	Pinsent Masons		
Siyabonga Machava	Pinsent Masons		
Dolly Mthethwa	Goedehoop Colliery		
Williencha Snyders	Goedehoop Colliery		
Erika Prinsloo	Nasonti		