



Goedehoop Colliery South Kleinfontein 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 Numbers: No.: (MP) 30/5/1/2/2/466 MR

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ACRONYMS

AMD	Acid mine drainage
Anglo	Anglo American Thermal Coal
AOPL	Anglo Operations Proprietary Limited
CE	Consulting Engineer
DMRE	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
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
MPRDA	Mineral and Petroleum Resources Development Act
WUL	Water Use License
NWA	National Water Act 36 of 1998
SABS	South African Bureau of Standards

1. Introduction

1.1. Background

Goedehoop Colliery is a division of Thungela Resources previously known as Anglo American Coal South Africa (“AACSA”), situated approximately 15 - 25 km south-east of eMalahleni on the remaining extent of portion 4 of the Farm Kleinfontein 49IS. It falls within the Steve Tshwete Local Municipality of the Nkangala District, Mpumalanga Province. The site covers an area of over 20 000 ha and is located in the Olifants river catchment within the Upper Olifants river management area (WMA 4) which forms part of the Witbank Dam catchment area.

Goedehoop Colliery comprises of two (2) sections namely North Section (previously known as Bank Colliery) and South Section (previously known as Goedehoop Colliery), operated under the mining rights with the 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. Although Kleinfontein is located near the South Section it operates under its own mining right with the Department of Mineral Resources and Energy (“DMRE”) reference number MP 30/5/1/1/2/466 MR. All these mining rights have approved Environmental Management Programmes (“EMPr”) in terms of Section 39 (6) of the Mineral and Petroleum Resources Development Act, 2002 (“MPRDA”, as amended).

Kleinfontein extension is an addendum to the approved Goedehoop Colliery EMPr and is connected to the operational Goedehoop Colliery via existing underground workings i.e. Block 20 underground extension and a proposed opencast operation i.e. Block 9 mini pit extension. Goedehoop Colliery South’s approved amended EMPr were valid after 8 December 2014 and as such remain valid. Therefore, the requirements of regulation 54A (2) read with regulation 34(1) of the amended EIA Regulations, 2014 are relevant to the operation. In view of the above and in complying with the above approval conditions of the EMPrs and relevant regulations of the NEMA EIA Regulations, a compliance assessment for Goedehoop Colliery South’s approved EMPrs.

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

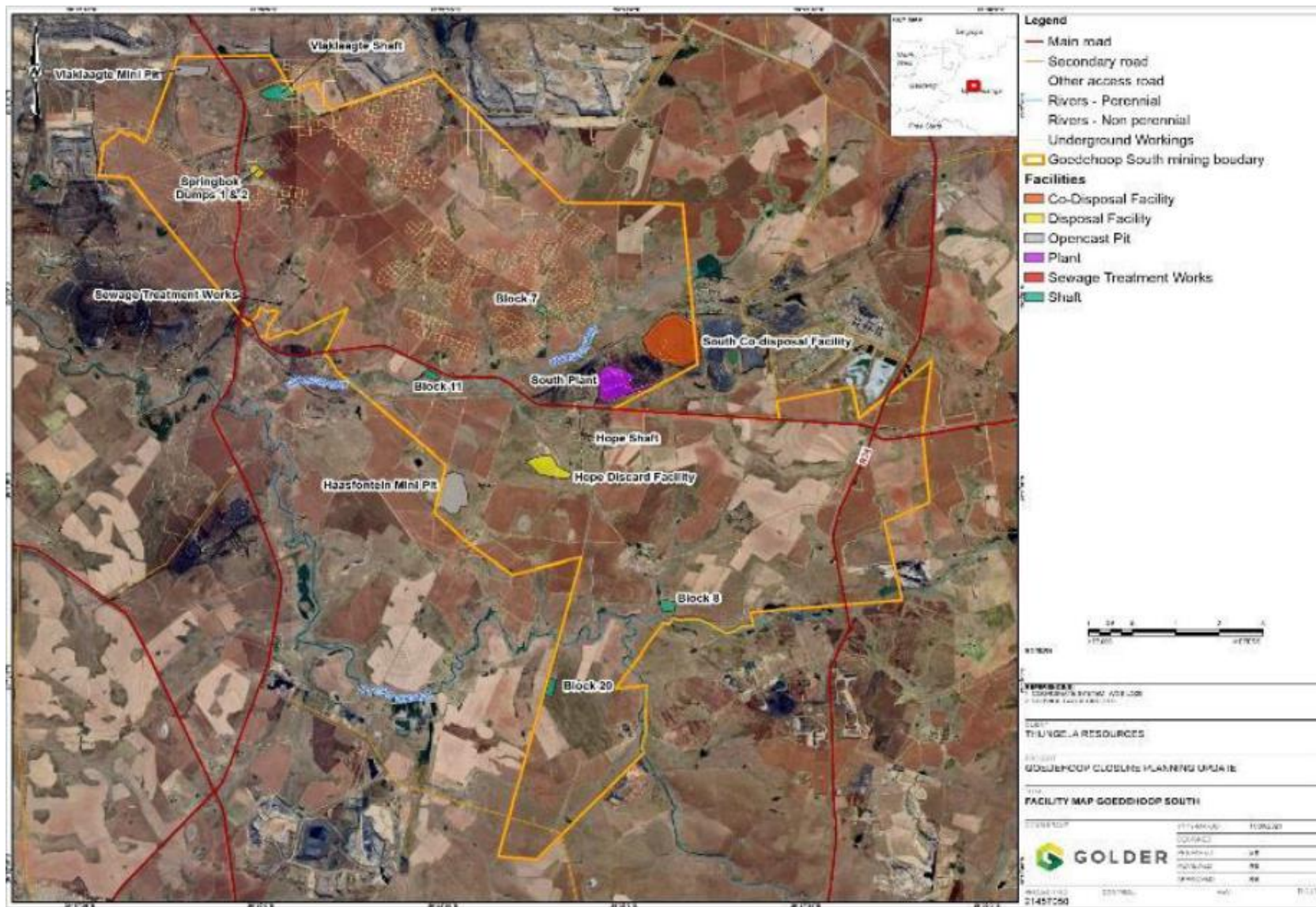


Figure 1: Regional Locality Map of Goedehoop Colliery South Coal Mine

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 EIA Regulations, 2014 states that the holder of an environmental authorisation must, for the period during which the environmental authorisation and EMPr remain valid, ensure that compliance with the conditions of the environmental authorisation and the approved EMPr is audited and that an environmental audit report, prepared by an independent person, is submitted to the relevant competent authority, which in the case of Goedehoop Colliery South is the Department of Mineral Resources, Mpumalanga Regional Office. 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 EMPr 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 EMPr for Goedehoop Colliery South (Kleinfontein Extension) were assessed and include:

- **Environmental Management Programme-**
 - Addendum for Goedehoop Colliery South (Kleinfontein extension) approved on the 16 May 2019, with DMR reference no.: MP 30/5/1/1/2/466 MR.

The compliance assessments on the EMPr as stated above for Goedehoop Colliery South (Roodepoort-Welverdiend) 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 Goedehoop Colliery South (Kleinfontein extension) 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 Goedehoop Colliery South (Kleinfontein Extension) is compliant with approved EMPr 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 South (Kleinfontein 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";

- It should be noted that the Mitigation Measures were extracted from the 2021/2022 Audit Report compiled by Geovicon Environmental (Pty) Limited. The EMPr Addendum for Goedehoop Colliery South (Kleinfontein Extension) approved on the 16 May 2019, was not provided by the site at the time this report was drafted.
- 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 South (Kleinfontein Extension) operation has been decommissioning and rehabilitated, no construction or operational activities were occurring on site during the audit period will be deemed applicable.
- Procedures developed by Goedehoop Colliery South (Kleinfontein 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 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 (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: admin@ntcgroup.co.za
Auditor	Ethel Chifunda (MSc) is a Principal Consultant at NTC Group (Pty) Ltd. She has over 5 years' experience in the Environmental Management field	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: ethel@ntcgroup.co.za

Role	Responsible Person	Contact Details
	including extensive experience within the mining sector. Ethel was the Lead Auditor who undertook the audit preparations, site assessment and audit report compilation.	
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

3. Disclaimer

This report has been produced by NTC Group (Pty) Ltd, with the skill and care normally exercised by a reasonable Independent Environmental Consultant during the rendering of the service. The service provided by NTC Group (Pty) Ltd should not be considered as a legal opinion of any kind, but it is a representation of the audit findings. The work performed was based on the Client's scope of work, time and resource allocations, as well as information provided by the Client. Any reference to legislation in this report should not be considered as a substitute for the provisions of such legislation.

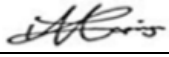
NTC Group (Pty) Ltd ensures by all means, that information provided by management and/or representatives is correct and relevant, and that this report is based on information that could reasonably have been sourced within the time period allocated to the audit performed. It should not be assumed that all possible and applicable findings are included in this report as this report represents a sample of the audit. Therefore, should additional information become available, NTC Group (Pty) Ltd reserves the right to amend its findings accordingly.

4. Declaration Of Independence

I, Tebogo Mapinga, declare that –

- I act as the independent Auditor;
- I performed 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; and

- No circumstances exist that may compromise the objectivity of NTC Group (Pty) Limited, excluding fair remuneration for work performed in connection with this environmental audit.

Signature: 
Company: NTC Group (Pty) Ltd
Date: 10 November 2023

5. Audit Methodology

5.1. Information Collation and Review

NTC reviewed the Final 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 Goedehoop Colliery South (Kleinfontein Extension). The information verified during the audit includes *inter alia*:

5.2. Site Verification

The site assessment and document review were completed on 16 to the 18 August 2023 by), Konanani Nelushi (NTC), Jessica Morwasehla (NTC), Ethel Chifunda (NTC), Sarah Burford (Pinsent Masons Africa LLP) and Siyabonga Machava (Pinsent Masons Africa LLP) (refer to Appendix A: Attendance Register). During the site assessment, additional documents were collated, and information was verified, Goedehoop Colliery South (Kleinfontein Extension) personnel were interviewed and selected areas were visited.

5.3. Assessment Methodology

NTC assessed each of the EMP conditions per the criteria provided in **Error! Reference source not found..** 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
Compliant	C	Full Compliance is when the construction or operational activities comply with the EMPr 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 EMPr 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 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. It is also applicable to conditions that must be noted by the site personal.

6. Audit Findings

Regulation 34(4) of the EIA Regulations, 2014 state the following:

Where findings of the Environmental Audit Report indicate:

- *insufficient mitigation of environmental impacts associated with the undertaking of activity;*
- *insufficient levels of compliance with the EAs or Approved EMPrs and where applicable the closure plan;*

the holder must when submitting the environmental audit report to the competent authority in terms of sub regulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify shortcomings identified in the environmental audit report and such recommendations must have been subjected to a public participation process as agreed to by the competent authority.

Based on the findings of the audit, no recommendation for the amendment of the Approved EMPr is proposed.

This section is aimed at highlighting the identified non-compliances so that Goedehoop Colliery South (Kleinfontein Extension) can prioritise implementation of recommendations and rectification actions. The full audit details are included in **Error! Reference source not found.3**.

6.1. Non-Compliances

No major and minor non-compliant findings were identified by the auditor and recommendations are depicted in below.

6.2. EMPr Recommendations

Regulation 34(4) of the EIA Regulations, 2014 (as amended) states:

“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.

6.3. Audit Findings

Table 3: EMPr for the Goedehoop Colliery South - Kleinfontein Extension EMPr (Dated May 2019) DMR Reference No.: MP 30/5/1/2/2/466 MR

No'	Management Principle	MITIGATION Measures_ Conditions of Audit	PHASE	Compl	Findings
4.2.1	Geology	No management measures are proposed to mitigate the impact.	Operational	N/A	Noted.
4.2.2	Soil and land capability	The proposed extension will not have any impact on the soils and land capability of the area; therefore, no management measures are required.	Operational	N/A	No applicable recommendations
4.2.3	Fauna and flora	The proposed mining extent will have no impact on the fauna and flora of the proposed extension area. It is therefore not considered necessary to provide management measures. However, the Biodiversity Assessment and Action Plan for Bank Colliery provides mitigation measures that mining related impacts on especially valuable habitats and species for the broader mining area.	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
4.2.4	Surface water	Wherever possible, the surface water supply will be supplemented with water from the water pumped from underground mining sections and from the Return Water Dam and other pollution control dams to maximise the re-use of water.	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		Quantities of water used for all major water users on the mine will be recorded and evaluated to determine where water waste occurs	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		Any complaints of loss of water from surrounding landowners will be investigated and measures implemented to rectify the problem immediately	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.

No'	Management Principle	MITIGATION Measures_ Conditions of Audit	PHASE	Compl	Findings
		A detailed water use licence process is currently being undertaken as part of the overall mine Integrated Water Use Licence Application which will determine the impact of the underground mining operation on water resources as well as all other related water issues. The study is being undertaken in parallel with this EMPR.	Operational	N/A	No further recommendations required.
4.2.5	Groundwater	Water pollution at the shafts will be kept to a minimum by limiting the time that underground water is exposed to the open rock faces where mining takes place.	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		Underground water will continuously be pumped from the shafts to the Erikson dams as mining continues and does not leave the premises of the mine, since it is re-used within the mining area	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		Groundwater boreholes will be monitored (water levels and water qualities) on a quarterly basis.	Operational	N/A	An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedeheop Cilliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
		The extent of the cone of depression will be analysed accordingly.	Operational	N/A	An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedeheop Cilliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
		If it is found that the mine causes a decrease in the yield of neighbour's borehole, the mine will provide and	Operational	N/A	An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground

No'	Management Principle	MITIGATION Measures_ Conditions of Audit	PHASE	Compl	Findings
		alternative water source to the affected user. However, the affected user must be able to prove scientifically that the mine is the cause of the reduced yield.			mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedeheop Colliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
		A groundwater model will be undertaken to determine the direction and rate of movement of the affected groundwater.	Operational		An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedeheop Colliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
4.2.6	Air quality	The proposed mining extension will occur underground and therefore, have no impact on the surface air quality. No management measures are required	Operational	N/A	Goedeheop Colliery South - Kleinfontein Extension takes note of this mitigation.
4.2.7	Noise	There are no noise impacts associated with the proposed extension as mining is underground and no surface infrastructure is required. No management measures are required	Operational	N/A	Goedeheop Colliery South - Kleinfontein Extension takes note of this mitigation.
4.2.8	Sites of Archaeological and Cultural Significance	No sensitive landscapes and sites of archaeological and cultural interests were identified on the project area. No management measures are required	Operational	N/A	Goedeheop Colliery South - Kleinfontein Extension takes note of this mitigation.
4.2.9	Social impacts	The mine will strive for successful implementation of the SLP.	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		The mine will assist where possible, local municipalities in developing economic development plans to create jobs	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		The mine will align its community development plans with the integrated development plan of the local and district municipalities.	Operational	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.

No'	Management Principle	MITIGATION Measures_ Conditions of Audit	PHASE	Compl	Findings
4.2.10	Alternative Land Use and Development Options	No management measures required for this.	Operational	N/A	No mitigation measure has been provided.
4.2.11		The mine will implement the SLP developed for Bank Colliery which addresses: • The processes pertaining to management of downscaling and retrenchment as per Regulation 46(d) of the Minerals and Petroleum Resources Development Act, • The establishment of the future forums, Mechanisms to ameliorate the social and economic impacts on individuals and mechanisms for the creation of • alternative solutions and solutions for creating job security on closure of the mine.	Decommissioning and Closure	N/A	The underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
4.2.12	Monitoring and Management	The monitoring programme currently undertaken by Bank Colliery will be continued throughout the life of the mine. Surface water monitoring is carried out on a monthly basis, while groundwater monitoring is carried out on a quarterly basis by agreement with DWAF.	Decommissioning and Closure	N/A	An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration (Groundwater and surface water monitoring report was provided). It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet.
		During operation, the monitoring programme will monitor all significant impacts identified during the EIA. Management measures for all negative impacts will be determined in accordance with Best Available Technology. These management measures will be measurable and their effectiveness will be audited during the performance assessment or the EMP after approval	Decommissioning and Closure	N/A	An extensive groundwater-monitoring network is established at Goedeheop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedeheop Colliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.

No'	Management Principle	MITIGATION Measures_ Conditions of Audit	PHASE	Compl	Findings
		The monitoring data will be documented, interpreted and reports on trends in the data will be submitted to DWAF on an annual basis.	Decommissioning and Closure	N/A	An extensive groundwater-monitoring network is established at Goedehoop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedehoop Cilliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
		Should the water quality or the receiving surface water bodies and groundwater aquifers exceed the water quality objectives/target values set in the Water Use Licence (currently in progress), the reason for deterioration will first be investigated. If the quality cannot be improved, other alternatives or treatment options will be investigated.	Decommissioning and Closure	N/A	An extensive groundwater-monitoring network is established at Goedehoop Colliery for the whole mine taking the extension areas into consideration. It must be noted; however, that the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet. The Goedehoop Cilliery Quarterly Water Quality Assessment Report (January 2023 to March 2023) was provided.
		After closure, a set of compliance sampling points will be chosen, as defined by DWAF. These sites should reflect the effectiveness of closure rehabilitation. Generally, for a period of 1-3 years, surface grab samples are taken monthly. Later it may be possible to reduce the number of elements analysed. Groundwater will be analysed monthly for the first year after which it may be possible to reduce the sampling frequency to a quarterly basis. The groundwater monitoring assesses any pollution plumes and seep.	Decommissioning and Closure	N/A	Goedehoop Colliery South - Kleinfontein Extension takes note of this mitigation.
		All Anglo Coal operations, including Bank Colliery, will adopt and implement a biodiversity management strategy. Guidelines have been developed in conjunction with the operations to assist them in the process. Bank Colliery's Biodiversity Action Plan identifies areas of potentially high biodiversity value and recommends management measures to conserve and/or rehabilitate these areas.	Decommissioning and Closure	N/A	The Biodiversity Action Plan, dated February 2014, and prepared by Digby Wells Environmental describes the integrated management plan which is the product of a synthesis of specialist recommendations regarding biodiversity and land management within the Goedehoop Colliery. However, the underground mining activities associated with this EMPr were not undertaken; therefore, this commitment is not applicable yet

7. Deliberations

7.1. Adequacy and compliance of the proposed Goedehoop Colliery South (Kleinfontein Extension) approved on the 16 May 2019

Goedehoop Colliery South (Kleinfontein Extension) Standard Environmental Management Plans were assessed not only for the Goedehoop Colliery South (Kleinfontein Extension) 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.

7.1.1. Adequacy with the proposed Goedehoop Colliery South (Kleinfontein Extension) approved on the 16 May 2019

Based on the assessment of the proposed Goedehoop Colliery South (Kleinfontein Extension) EMPr, we are of the opinion that the EMPr is no longer applicable as the project site has been decommissioned and rehabilitated. mitigation of environmental impacts associated with the operation of the Goedehoop Colliery South (Kleinfontein Extension) operations.

7.1.2. Compliance with the proposed Goedehoop Colliery South (Kleinfontein Extension) approved on the 16 May 2019

No non-compliances were identified during the audit for the Goedehoop Colliery South (Kleinfontein Extension) EMPr. It should be noted that the site has been decommissioned and rehabilitated.

8. Conclusion

This environmental audit report was compiled to comply with the relevant legislative requirements specifically the NEMA, with the main objectives to report on the compliance status of the commitments and conditions, as well as the appropriateness and adequacy of the various EMPr. This audit report will be submitted to the competent authority within 7 days of submission of this Audit Report to the competent authority (DMRE), Thungela Operations (Pty) Ltd, Goedehoop Colliery South (Kleinfontein Extension), must notify all potential and registered I&APs of the submission, and make this report immediately available to anyone on request and on a publicly accessible website.

APPENDIX B: SITE VISIT 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		