



GREENSIDE COLLIERY

EXTERNAL ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT 2023 – 2024

In Compliance with Regulation 34 and Appendix 7 of the Environmental Impact Assessment Regulations (GN 982 of 2014), as amended, Section 24N(7)(d) of the National Environmental Management Act (Act 107 of 1998) and Regulation 55 of the Mineral Resources and Petroleum Development Regulations (GNR 527 of 23 April 2004), as amended.

AUDIT DATES: 16 - 17 & 25 - 26 SEPTEMBER 2024

DMRE REFERENCE:

MP30/5/1/2/3/2/1 (304) EM (31 January 2022)

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RELATED DOCUMENTS

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1. INTRODUCTION

Thungela Resources (Pty) Ltd (hereafter, Thungela) is a South African based thermal coal producer and exports coal mainly to Indian, Asian, SEA, Middle East and North African markets. Thungela owns interests in and produces thermal coal at eight mining operations. Opencast mining operations are undertaken at the Isibonelo, Khwezela and Mafube mining operations and underground mining operations are undertaken at the Zibulo, Greenside, Goedehoop and Elders (currently in construction) mining operations.

Thungela appointed NTC Group (Pty) Ltd as an independent Environmental Practitioner to undertake the annual external environmental Performance Assessment in accordance with Regulation 34 of the Environmental Impact Assessment (EIA) Regulations (GN R982 of 2014), as amended, and Regulation 55 of the Mineral Resources and Petroleum Development (MRPD) Regulations (GNR 527 of 23 April 2004), as amended, to assess compliance with the Environmental Authorisations (EA) and Environmental Management Programmes (EMPr) issued to its operations. This report presents the annual external environmental Performance Assessment Report (PAR) for Greenside Colliery for the 2023 - 2024 audit period. The objective of the performance assessment was to verify Greenside Colliery's compliance with conditions of the EAs and EMPrs that remained valid for the assessment period (August 2023 – August 2024) and to determine the effectiveness of mitigation measures implemented to manage environmental impacts associated with their authorised activities.

1.1. GREENSIDE COLLIERY

1.1.1. Background

Greenside Colliery is an underground mining operation situated on various portions of the farm Groenfontein 331 JS, Blaauwkrans 323 JS, Klipfontein 322 JS, Weltevreden 324 JS and Vlaklaagte 330 JS, within the Magisterial District of Nkangala, Mpumalanga Province (Refer to Figure 1 for the locality map).

Greenside Colliery originally operated under Mining Right (Ref: MP 30/5/1/2/2/3 04 MR) and EMPr (March 2002) which was approved by the Department of Mineral Resources and Energy (DMRE) in terms of the Section 39 (6) of the MPRDA (Act 28 of 2002) (now repealed). In 2008, Greenside Colliery applied to the DMRE for conversion to a new Mining Right. The DMRE subsequently issued a directive to Greenside Colliery to align its EMPrs which included:

- eMalahleni Water Reclamation Plant EMPr (November 2005).
- Greenside Expansion Project EMPr (2006).
- eMalahleni Water Reclamation Plant EMPr Addendum (2006).
- Greenside Colliery Ventilation Shaft EMPr Amendment (2007).
- eMalahleni Water Reclamation Scheme Expansion Project EMPr Addendum (2011).

The DMRE issued an additional directive on 15 December 2010 which required Greenside Colliery to update their EMPr to include their International Organisation of Standards (ISO) 14001:2004 Environmental Management System (EMS). The EMPr was updated and submitted to the DMRE in March 2011. However, shortly thereafter, Greenside Colliery identified additional projects that should be included in the EMPr (i.e. Coal Discard Dump, Retreatment Plant and the extension of the existing Coal Discard Dump). As agreed with the DMRE in June 2012, the EMPr submitted in March 2011 was retracted and Greenside Colliery amended the EMPr to include the additional projects. The amended EMPr was approved by the DMRE in December 2014. The DMRE issued a further directive in July 2015 which required Greenstone Colliery to again amend the EMPr to include the Thandeka ventilation shaft and the amended EMPr was approved by the DMRE in December 2015.

Furthermore, Anglo Operations (Pty) Ltd signed an agreement with Glencore Mining (Pty) Ltd in 2013 to exchange certain mineral resources as part of the Kriel - Nooitgedacht transaction which required an amendment of the respective Mining Rights, which included the incorporation of a portion of Tweefontein's Mining Right (MP30/5/1/2/2/289 MR) into Greenside Colliery Mining Right (MP 30/5/1/2/2/304 EM).

NTC Group (Pty) Ltd was appointed by Thungela as an independent Environmental Practitioner to undertake the annual external environmental performance assessment for Greenside Colliery to verify compliance with the conditions of the EAs and EMPrs that remained valid for the assessment period (August 2023 – August 2024) and to determine the effectiveness of mitigation measures implemented to manage environmental impacts associated with their authorised activities.

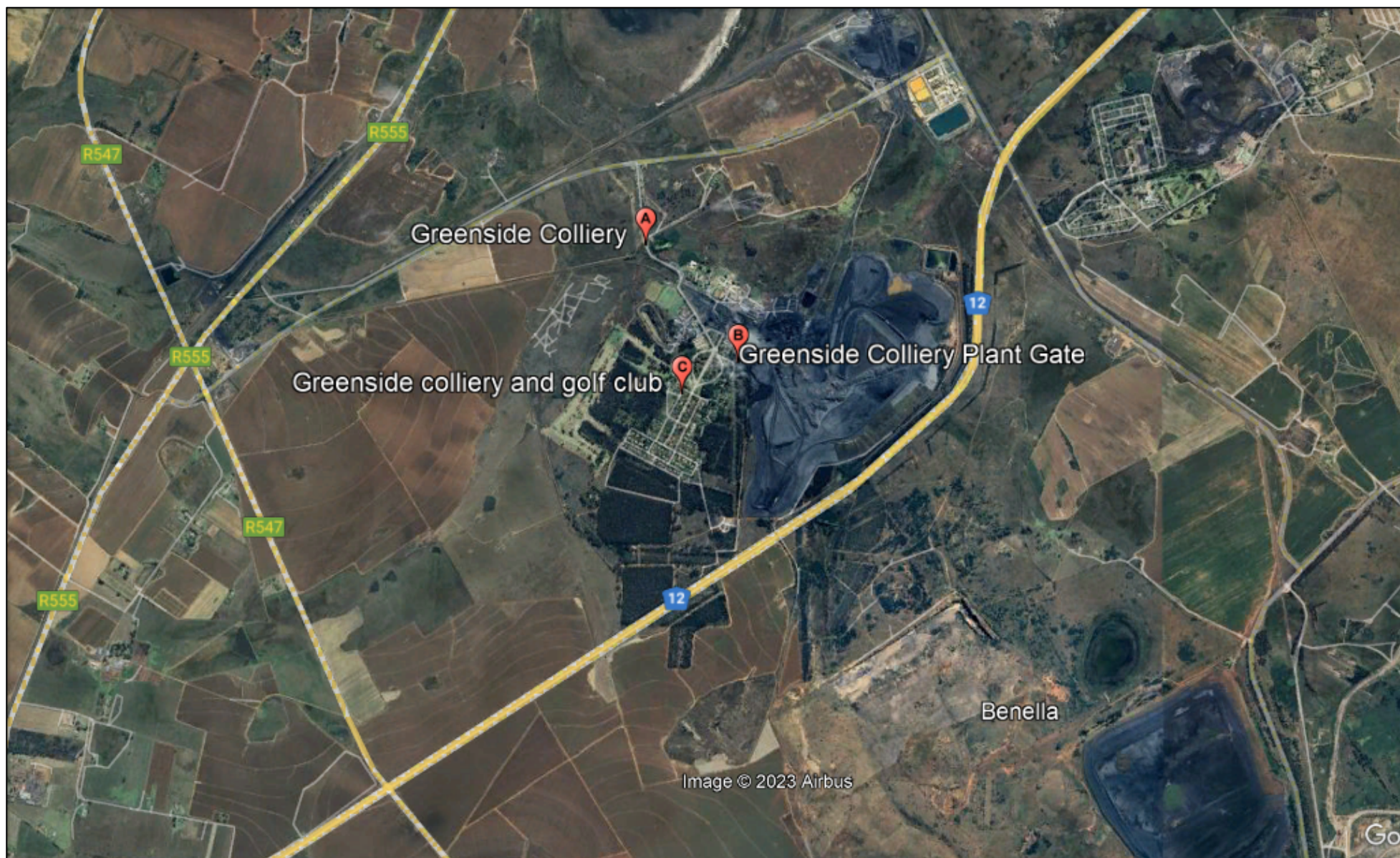


Figure 1: Locality Map of Greenside Colliery

2. AUDIT TERMS OF REFERENCE

2.1. MINERAL AND PETROLEUM RESOURCES DEVELOPMENT REGULATIONS (GN R527 OF 23 APRIL 2003)

The performance assessment is undertaken in accordance with Regulation 55 of the MPRD Regulations (GN R527 of April 2004) published in terms of the MPRD Act (Act 28 of 2002). Regulation 55 (1) of the MPRD Regulations requires that a monitoring and performance assessments be undertaken to assess the continued appropriateness and adequacy of the Environmental Management Programme. A Performance Assessment Report must be compiled and submitted to the Department of Mineral Resources and Energy. Regulations 55 (2) states that the frequency for undertaking the performance assessment must be in accordance with the Environmental Management Programme, or every two years, or as agreed to in writing by the Minister. Regulation 55(4) requires that the performance assessment be conducted by an independent competent person(s).

The amendment of the MPRD Act (Act 28 of 2002) in 2014, included the repeal of Sections 39 – 42 and the insertion of Section 38 A and B to align the requirements for Environmental Management Programmes contained in the National Environmental Management Act (NEMA) (Act 107 of 1998). Section 38B of the MPRDA (Act 28 of 2002), as amended, states that *“an environmental management plan or environmental management programme approved in terms of this Act before and at the time of the coming into effect of the National Environmental Management Act, 1998 shall be deemed to have been approved and an environmental authorisation been issued in terms of the National Environmental Management Act, 1998”*.

2.2. ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN R982 OF 2014)

The EIA Regulations (GN R982 of 2014), as amended, were published in terms of the NEMA (Act 107 of 1998) to regulate the process for preparing, evaluating, and submitting applications for EAs. Section 34 of the EIA Regulations provides the requirements for auditing the compliance with EAs, EMPs and Closure Plans. Section 34 (1) and (2) requires the holder of an EA to appoint an independent person to conduct an audit of all valid EAs and EMPs at the intervals specified in the EA and submit an audit report to the Competent Authority.

The audit report must include the information in Appendix 7 and as per Section 34 (3) must contain verifiable audit findings which are presented in a structured approach to indicate the level of compliance with the EAs and EMPs and the effectiveness of the mitigation measures in the EMP to manage environmental impacts associated with the authorised activities. In terms of Section 34 (4), if there is insufficient compliance with the conditions of the EA or EMP, or if mitigation measures in the EMP for managing environmental impacts are deemed to be inadequate, the audit report must provide recommendations to amend the EMP to rectify the shortcomings.

Section 34 (5) states that such recommendations must be subjected to a Public Participation Process and Section 34 (6) that I&APS must be notified on a public website within 7 days of submitting the report to the Competent Authority.

2.3. GREENSIDE COLLIERY ENVIRONMENTAL AUTHORISATION

The EA issued by Department of Mineral Resources and Energy to Greenside Colliery that remained valid for the audit period and were audited in accordance with Section 34 of the EIA Regulations are:

1. Greenside Colliery's Environmental Authorisation regarding the consolidation and amendment of the Environmental Impact Assessment report and Environmental Management Programme Report which includes the PCD, Discard Dump Retreatment Plant, East Block Underground Mining Project and Thandeka Ventilation Shaft dated 31 January 2022 (DMRE Ref: (MP) 30/5/2/3/2/1/ (304) EM).

2.4. GREENSIDE COLLIERY ENVIRONMENTAL MANAGEMENT PROGRAMMES

The Environmental Management Program approved in the Environmental Authorisations that remained valid for the audit period and were audited in accordance with Section 34 of the EIA Regulations are as follows:

1. Greenside Colliery's EMPr Consolidation and Amendment to include the PCD, Discard Dump Retreatment Plant, Waterpan Mining Area, East Block Underground Mining Project and Thandeka Ventilation Shaft dated 31 January 2022 (DMRE Ref: (MP) 30/5/2/3/2/1/ (304) MR).

2.5. ASSUMPTIONS AND LIMITATIONS

The scope of the performance assessment is to determine the level of compliance with the conditions of the EA and EMPr and the effectiveness of the mitigation measures provided in the EMPr to manage the environmental impacts associated with the authorised activities.

The following assumptions and/ or limitations are applicable to the assessment and findings:

- This performance assessment is a snap-shot representation of the current activities at Greenside Colliery.
- The assessment period is from August 2023 to August 2024. Conditions which refer to activities occurring prior to this assessment period are assumed to have been previously assessed and will thus not be assessed. Such conditions are determined to be "Not Applicable".
- Due to the nature and extent of the operation, not all areas may be visited during the site inspection.
- Greenside Colliery representatives may be called upon to provide information relating to specific activities within their respective areas.

- Greenside Colliery is currently operational. Where current activities relate to construction, decommissioning or closure, these may be deemed as not applicable.
- Procedures developed by Greenside Colliery specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System.
- Outdated/ repealed legislation or referenced guideline documents will be substituted for with current/ relevant legislation and referenced guideline documents.

3. PERFORMANCE ASSESSMENT DETAILS

3.1. AUDIT TEAM

NTC Group (Pty) Ltd was established in 2005 and is 100% female, black owned with a Level 1 Broad Based Black Economic Empowerment 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 our services in accordance the requirements of South African legislation, as well as acceptable international best practices.

The details of the specific environmental team that participated in the performance assessment at Greenside Colliery are provided in Table 2. The declaration of the auditor's independence is attached in Appendix A and the Curriculum Vitae for the auditors are attached in Appendix B.

Table 1: Details of the Audit Team

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
LEAD AUDITOR	Tanja Bekker is a Senior Environmental Scientist at NTC Group (Pty) Ltd. Tanja holds an MSc Environmental Management and has over 22 years of experience in Environmental Management, inclusive of performance assessment audits and compliance monitoring.	Tel: +27 11 462 2022
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LEAD AUDITOR	Mary-Anne Carter is a Senior Environmental Scientist at NTC Group (Pty) Ltd. Mary-Anne holds an MSc in Environmental Science and has over 15 years of experience in environmental management, including environmental auditing, EMS implementation and compliance monitoring.	Tel: +27 11 462 2022
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3.2. PERFORMANCE ASSESSMENT METHODOLOGY

3.2.1. Document Review

NTC Group (Pty) Ltd reviewed the conditions of the Environmental Authorisation and Environmental Management Programmes issued to Greenside Colliery and compiled a Request for Information (RFI) document which provided a list of documents and records required from Greenside Colliery to verify compliance with the conditions of the EA and EMPr. The RFI was submitted to Greenside Colliery and the requested information was availed to the auditors. The list of documents reviewed during the performance assessment are provided in Section 9. References.

A checklist was created verbatim of the conditions the EAs and EMPs issued to Greenside Colliery's and used to assess compliance. The numbering in performance assessment checklists corresponds with the conditions of the EA and EMP to allow for ease of reference.

3.2.2. Site Assessment

A site assessment was conducted on 25 – 26 September 2024 and was attended Tanja Bekker (NTC), Nnzumbeni Tshikalange (Greenside Colliery), Sarah Burford (Pinsent Masons) and Christin Kleingeld (Pinsent Masons). During the site inspection, Greenside Colliery personnel were interviewed and the following facilities/ areas in were inspected:

- Dust A Side Station and Out Bye Lay-Down Area
- Underground Waste Area
- Shaft Wash-Bay
- Oil Fill-Up Area
- LHD Workshop
- LDV Parking Area
- LDV Workshop
- Shaft Surface Area
- Village And Golf Course
- Borehole Substation
- 2 Seam Boreholes
- Discard Dump
- New PCD
- Bottom Dam
- Y2 K
- Lake Lucy
- Rainbow Tank
- Green Dam
- STP Plant
- Permanent Contractors Managing Discard Dump
- Engineering Workshops
- Green Side East Exploration Boreholes (GA)
- Ventilation Shaft
- River Crossing
- Blue Tanks
- Diesel Filling Area
- Nursery.

3.3. PERFORMANCE ASSESSMENT COMPLIANCE CRITERIA

NTC Group (Pty) Ltd assessed each condition of the Environmental Authorisation and the Environmental Management Programme in terms of the criteria provided in Table 2. The audit approach was guided by the requirements of the ISO 19011:2018 Guidelines for Auditing Management Systems.

Table 2: Performance Assessment Criteria

CRITERIA	ACC	DESCRIPTION
COMPLIANT	C	Full Compliance is when the current construction, operational, or decommissioning activities comply with the authorisation conditions. Mitigation measures or commitment thereof have been achieved and evidence is provided in the form of a document or condition implementation onsite. No mitigation measures are required where operations comply.
NON-COMPLIANT	N/C	Non-Compliance is when construction, operational, or decommissioning activities are in contravention of the conditions and/or have the potential to impact the environment in a detrimental manner. Non-compliance may also be associated with activities breaching legislation/ Mitigation measures or commitment thereof have not been achieved and evidence is not provided in the form of a document or condition implementation onsite. Non-Compliance findings have a high priority and mitigation measures are mandatory
NOT APPLICABLE	N/A	Not Applicable is assigned to authorisation/ permit conditions where activities 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.
TAKE NOTE	T/N	In certain instances, conditions are presented in a manner which cannot be assessed as a Compliant or Non-Compliant Condition. This is a specific requirement which the Competent Authority may stipulate, which is applicable to the site and should be considered in the near future, or which allows the Competent Authority certain allowances.

3.4. PERFORMANCE ASSESSMENT SCOPE

The scope of the information and audit boundaries that were considered when conducting the performance assessment included:

- The requirements of Section 34 and Appendix 7 of the EIA Regulations (GN R982 of 2014), as amended.
- Regulation 55 of the MPRD Regulations (GNR 527 of 23 April 2004), as amended.
- Greenside Colliery's EAs (refer to Section 2.2.) and EMPs (refer to Section 2.3.) that remained valid for the audit period.
- The scope of the assessment period between August 2023 – August 2024.
- The property boundaries of the Greenside Colliery as shown in Figure 1.

4. PERFORMANCE ASSESSMENT RESULTS

This section provides results of performance assessment to verify compliance with the conditions of Greenside Colliery's EAs and EMPs. The performance assessment results are presented in the checklists described in Section 3.2.1 which tabulates the conditions of the EAs and EMPs. Each condition was assessed and assigned a finding as per the assessment criteria shown in Table 2.

The checklists used to assess compliance with the EAs and EMPs are provided in Tables 3 and 4 as follows:

TABLE 3	Environmental Authorisation (MP 30/5/1/2/3/2/1 (304) EM) issued by the Department of Minerals and Energy Resources to Greenside Colliery for the consolidation and amendment of the Environmental Impact Assessment report and Environmental Management Programme report to include the PCD, Discard Dump, Retreatment Plant, East Block Underground Mining Project and Thandeka Ventilation Shaft
TABLE 4	Environmental Management Programme approved by the Department of Minerals and Energy Resources (Ref. MP 30/5/1/2/3/2/304 MR) for the consolidation and amendment of the Environmental Impact Assessment report and Environmental Management Programme report to include the PCD, Discard Dump, Retreatment Plant, East Block Underground Mining Project and Thandeka Ventilation Shaft at Greenside Colliery.

TABLE 3. ENVIRONMENTAL AUTHORISATION (MP30/5/1/2/3/2/1 (304) EM DATED 31 JANUARY 2022) ISSUED BY THE DEPARTMENT OF MINERALS AND ENERGY RESOURCES TO GREENSIDE COLLIERY FOR THE CONSOLIDATION AND AMENDMENT OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT TO INCLUDE THE PCD, DISCARD DUMP, RETREATMENT PLANT, EAST BLOCK UNDERGROUND MINING PROJECT AND THANDEKA VENTILATION SHAFT

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.1. STANDARD CONDITIONS			
8.1.1	Authorisation of the activity is subject to the conditions contained in this Authorisation, which forms part of the Environmental Authorisation and are binding on the holder of the Authorisation.	C	Mining activities at Greenside Colliery is undertaken in accordance with the Environmental Authorisation and EMPr (MP30/5/1/2/3/2/1 (304) EM dated 31 January 2022) issued by the Department of Mineral Resources and Energy, as well as the WULs issued by the Department of Water and Sanitation.
8.1.2	The holder of the Authorisation shall be responsible for ensuring 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	Greenside Colliery ensures agents, subcontractors, and employees undergo induction training in environmental management before contract commencement. The induction training presentation was availed to the auditor in "Greenside Colliery Induction 2024" , and it covers environmental good practice and topics related to its EA and EMPr conditions.
8.1.3	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.	T/N	Greenside Colliery reported that no changes to the authorisations were undertaken for the audit period.
8.1.4	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, including the transfer of this Authorisation, the applicant must in writing notify the Regional Manager of the Department, within fourteen (14) days of the above specific change.	T/N	Greenside Colliery reported that no changes to the contact details were undertaken for the audit period.
8.1.5	A copy of this authorisation must be kept on site.	C	An electronic copy of the Environmental Authorisation was available at Greenside Colliery during the audit.
	The Authorisation must be produced to any Government official (s) who may requests to see it for inspection purposes and must be available to the contractors (s)/subcontractor (s) authorised to undertake work at the property.	T/N	The condition is noted and accepted by Greenside Colliery. An electronic copy of the Environmental Authorisation is available at Greenside Colliery and available on request.
8.1.6	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	The requisite Environmental Authorisations for activities undertaken Greenside Colliery in terms of the National Environmental Management Act (Act 107 of 1998) as well as the required Water Use Licences in terms of the National Water Act (Act 36 of 1998) have been issued.
8.1.7	After an appeal period has expired and no good course to extent the appeal period has been submitted in accordance with chapter two of the National Appeal Regulation of 2014, a thirty day written notice must be given to the Department that the activity will commence. Commencement for the purpose of this condition includes site preparations. The notice must include a date on which it is anticipated that the activity will commence.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024).
8.2. SPECIFIC CONDITIONS			
8.2.1 COMMISSIONING OF THE ACTIVITY			
8.2.1.1	This Authorisation is hereby solely granted for the activities outlined on item 7 (a-c) in respect of various portions of the farm Groenfontein 331 JS, Blaauwkrans 323 JS, Klipfontein 322 JS, Weltevreden 324 JS and Vlaklaagte 330 JS, situated within the magisterial district of Nkangala: Mpumalanga region.	C	Greenside Colliery undertakes mining and related activities on the properties authorised in the Environmental Authorisation.
8.2.1.2	The activity may not commence without the necessary permit/licence/approvals and/or service agreements, where it is relevant, from or with the relevant regulatory authorities whether national, provincial or local.	C	The requisite Environmental Authorisations for activities undertaken Greenside Colliery in terms of the National Environmental Management Act (Act 107 of 1998) as well as the required Water Use Licences in terms of the National Water Act (Act 36 of 1998) have been issued.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.2.1.3	The construction of all infrastructure must be done in accordance to the approved EIAR and EMPr.	C	The EMPr is implemented and provides effective measures to prevent environmental pollution, including continuous monitoring of mining operations, employee education on environmental risks, implementation of policies and procedures and management of environmental incidents in accordance with emergency procedures. Greenside Colliery appoints an independent external service providers to conduct an annual audits to verify compliance with the conditions of the EMPr and this report constitutes the audit for the current audit period (August 2023 - August 2024) and the EMPr audit is provided in Table 2 below.
8.2.1.4	The site, or any portion thereof must be covered and maintained in such a way that: Prevents the formation of pools, and or damming due to rain. Allow free surface runoff of rain-water. Prevents the contamination of storm water. Result to minimal or no erosion.	NC 001	The Storm Water Management Plan for Greenside Colliery (September 2024) was availed during the audit and is implemented at the site. However, during the site inspection inadequate drainage was observed which resulted in ponding: - Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area. - Water emanating from pavement washing was ponding at the Plant Fire tanks. - Water generated at the Discard Silo area was flowing over the road and ponding within information gravity to the silt trap (WCDM).
8.2.1.5	The company must apply the principle of best practicable environmental options for the technologies used/implemented during the project.	NC 002	During the site inspection at the Shaft Erickson Dam, water spills were observed around the facility and ponding ,with a white precipitation was visible. At the LHD Workshop, water runoff from the downgradient area was observed to be bypassing the dirty water channels and discharging into the uncontained environment. At the New PCD and Bottom Dam, the auditors observed that silt was placed on unlined surfaces. At the Rainbow Tanks and Blue Tanks, various water spills and water ponding was observed. Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area. At the Plant Fire tanks water emanating from pavement washing was observed to be ponding . At the Discard Silo, water generated in this area was flowing over the road and ponding within information gravity to the silt trap (WCDM).
8.2.1.6. Pre-Construction Phase			
a)	The applicant must appoint an independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EIAR and EMPr together with the Environmental Authorisation.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
b)	A surface water drainage plan should be compiled prior to construction.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
c)	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
d)	Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
e)	If any soil contamination is noted at any phase of the proposed activity(ies), the contaminated soil must be removed to a licenced waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
e)	The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposed and this Department must be informed in this regard. Recommendations from the soil study must also be strictly adhered to in order to minimise soil contamination.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
8.2.1.7. Access Roads and Traffic Impacts			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
a)	Necessary signage and traffic measures must be implemented for safety and convenient to the site from adjacent roads.	C	During the site inspection, signage was observed on the access road near the Greenside Colliery entrance indicating the movement of construction vehicles and the speed limit.
b)	Access roads must be well maintained throughout the mining operation.	C	During the site inspection, access roads were observed to be in good condition.
8.2.1.8. Air Quality Management			
a)	The recommendations outlined in the Air Quality study must be strictly adhered to.	C	Greenside Colliery conducts monthly dust fallout monitoring at nine monitoring points. The results (2023) provided during the indicate that PM2.5 and PM10 fall within the residential and non-residential limits.
b)	Proper measures must be put in place to suppress dust in order to minimize nuisance conditions.	C	Dust is managed by using water tankers trucks to wet access roads or dust generating areas and the water bowser was observed during the site inspection.
c)	A speed restriction of 40km/h must be enforced on site for all mine vehicles.	C	During the site inspection, signage indicating a speed limit of 40 km/ hr was observed throughout the site.
8.2.1.9. Proliferation of Alien Species			
a)	All construction equipment and vehicles must be cleaned before entering and leaving the site to reduce the chances of spreading weeds and invasive species.	C	The cleaning of construction vehicle is provided for at the Greenside Colliery workshop.
8.2.1.10. Noise			
a)	The recommendations outlined in the noise study must be strictly adhered to.	C	The recommendations provided in the noise study are included in the EMPr. A compliance audit of the EMPr is provided in Table 2, and conditions relating to noise are compliant.
b)	Activities must be limited to normal hours.	C	Greenside Colliery is authorised to operate two shifts, the first is from 06h00 am to 15h00 pm and the second is from 15h00 pm to 06h00 am.
c)	Mine vehicles must be fitted with standard silencers prior to beginning of construction.	C	All machinery and vehicles employed are fitted with exhaust systems and are maintained in a good state of repair.
8.2.1.11. Waste Management			
a)	General waste must be kept in containers which are wind and scavenger proof, and disposed of at a permitted landfill site. No temporarily dumping and littering of waste is allowed on site.	NC 003	During the site inspection, poor general waste management practices were observed: Waste Littering was observed at the Oil Fill-up Area, LDV Parking Area, Shaft Surface Area, Permanent Contractors Managing Discard Dump and Engineering Workshops Discarded Building rubble was observed behind tanks at the Dust a side station and OutBye Lay-down Area.
b)	No waste must be disposed of through burying and burning.	C	Greenside Colliery Waste Management Procedure provides the guidelines for waste management and prohibits waste burning or burying. During the site inspection, no incidents of waste burning or burying were observed.
c)	All hazardous waste must be disposed of at an official registered site or be removed by registered hazardous waste contractors.	C	Waste Manifests for the disposal of hazardous waste were availed during the audit. HAZCO Green Solutions CC is collects of hazardous waste from Greenside Colliery at disposed this at Holfontein Landfill site.
d)	An emergency preparedness plan to address any pollution incidents (i.e. such as oil spillage etc) that occur on site must be developed.	C	The "Emergency Preparedness Plan" was availed during the audit and provides adequate direction for the containment, clean-up and disposal of hazardous chemical spillages. The plan was provided for review dung the audit period.
e)	Waste must be dealt with in accordance with the approved BAR and EMPR.	NC 003 NC 004	During the site inspection, poor waste management practices were observed: - Waste Littering was observed at the Oil Fill-up Area, LDV Parking Area, Shaft Surface Area, - Permanent Contractors Managing Discard Dump and Engineering Workshops - Waste Mixing/ incorrect waste separation in waste receptacles was observed at the - Underground Waste Storage Area, LDH Workshop and Shaft Surface Area - Building rubble was observed behind tanks at the Dust a side station and Out Bye Lay-down Area - Hazardous waste bins were not covered and not in a contained area at the Permanent Contractors Managing Discard Dump and Shaft wash-bay.
8.2.1.12. Surface and Groundwater Contamination must be Prevented and/or Mitigated			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
a)	The recommendations outlined in the surface water report and the groundwater report must be strictly adhered to.	C	Recommendations from the surface and the groundwater reports are logged onto and managed on the Enablon system includes the time, date, details of the incident and or reasons for the recommendation, investigation actions to be taken, corrective and preventative actions, responsible persons and target dates.
b)	Specific area must be demarcated for fuelling and workshop services. And such area must be bunded to reduce the possibility of soil and water contamination.	C	All fuel and diesel storage facilities are placed within concreted and bunded areas, as verified during the site inspection.
c)	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
d)	Spillage of petrochemical products must be avoided. In the case of accidental spillage, contaminated soil must be removed for bioremediation or disposed of at a facility for the substance concerned. Disturbed land must be rehabilitated and seeded with vegetation seed naturally occurring on site.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
8.2.1.13. Fire prevention and management			
a)	Fire extinguishers that are in good working conditions must be made available at all times for their usage during the occurrence of accidental fires.	C	During the site inspection, fire extinguishers were observed at strategic locations throughout the site.
b)	Workers must be adequately trained in the handling of firefighting equipment.	C	Greenside Colliery has a trained fire team and fire training certificates were provided to the auditors.
c)	Open fires must strictly be prohibited.	C	Greenside Colliery reported that open fires are not permitted on the site.
d)	Smoking must be prohibited in the vicinity of flammable substances.	C	Smoking is prohibited in the vicinity of flammable. Smoking signs are was observed at the designated smoking areas.
e)	Cooking and heating fires must be permitted only in designated areas with appropriate safety measures.	C	Greenside Colliery reported that no cooking and heating fires are undertaken at the project area.
8.2.1.14. Stormwater Management			
a)	Storm water management plan must be developed, and implemented on site.	NC 001	The Storm Water Management Plan for Greenside Colliery (September 2024) was availed during the audit and is implemented at the site. However, during the site inspection inadequate drainage was observed which resulted in ponding: - Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area. - Water emanating from pavement washing was ponding at the Plant Fire tanks. - Water generated at the Discard Silo area was flowing over the road and ponding within information gravity to the silt trap (WCDM).
8.2.1.15. Safety			
a)	Potential hazard areas must be demarcated with dander tapes.	C	Greenstone Colliery reported that danger tape is used at areas that present temporary potential hazards, such as excavations.
b)	Appropriate signage must be placed to caution employees and contractors not to attempt to enter certain structures without being authorised.	C	During the site inspection sufficient signage was observed indicating safety requirements such as "no unauthorised entry", "flammable signage" and PPE requirements.
8.2.1.16. Emergency Response Plan			
a)	An Emergency Response Plan should be available for accidental spills and firefighting during both construction and operation of the project.	C	An Emergency Preparedness and Response Plan is developed and implemented by Greenside Colliery and provides a guideline for emergency situation associated with accidental spills and firefighting measures.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
b)	In the event of emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.	C	The Emergency Preparedness and Response procedures was availed during the audit and provide the process for the managing and reporting pollution events as aligned to the EA and NEMA requirements. The list of incidents recorded for the audit period (August 2023 - August 2024) were reviewed during the site inspection on Greenside Colliery's Enablon system and no reportable (medium or major) incidents were recorded.
c)	All significant pollution incidents must be reported to this Department within forty eight (48) hours of occurrences.	C	The Emergency Preparedness and Response procedures was availed during the audit and provide the process for the managing and reporting pollution events as aligned to the EA and NEMA requirements. The list of incidents recorded for the audit period (August 2023 - August 2024) were reviewed during the site inspection on Greenside Colliery's Enablon system and no reportable (medium or major) incidents were recorded.
8.2.1.18. Compliance with Other Legislation			
a)	The National Environment Management Act, 1998 (Act 107 of 1998), with particular reference to the principle in chapter 2 of the said Act.	C	Greenside Colliery has demonstrated that sufficient measures are taken to ensure compliance with the requirements of the National Environment Management Act (Act 107 of 1998). Various specialist studies were conducted for key environmental attributes found in the mining area, which were included in the application for an environmental authorisation and the EMPr.
b)	The National Water Act, 1998 (Act 36 of 1998), with particular reference to the sections pertaining to any activity in the proximity of dams and catchments area, rivers, marshes, streams, pans and other water courses.	C	Greenside Colliery has been issued with a Water Use Licences which authorises all water use activities identified in terms of Section 21 of the National Water Act (Act 36 of 1998).
c)	The assurance of this authorisation does not exempt the licence holder from compliance with any other legislation including Section 40 of the National Water Act, 1998 (Act 36 of 1998).	C	Greenside Colliery has been issued with a Water Use Licences which authorises all water use activities identified in terms of Section 21 of the National Water Act (Act 36 of 1998). The site design also includes a separation of clean and dirty water systems.
d)	The National Environmental Management Air Quality Act (Act 36 of 2004), with particular reference to the sections pertaining to the liberation of dust, and other emissions, created by mining related activities (stockpile), into the atmosphere.	C	Greenside Colliery conducts monthly dust fallout monitoring at nine monitoring points. The results (2023) provided during the indicate that PM2.5 and PM10 fall within the residential and non-residential limits.
e)	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.	C	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Greenside Colliery complies with the requirements of the Conservation of Agriculture Resources Act (Act 43 of 1983),
f)	The National Heritage Resources Act, 1989 (Act No 25 of 1999), with particular reference to the protection of all historical and pre-historical cultural remains.	C	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Greenside Colliery complies with the requirements of the National Heritage Resources Act (Act No 25 of 1999).
g)	The Mine Health and Safety Act, 1996 (Act 29 of 1996) in conjunction with the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), with particular reference to those sections and regulations pertaining to health and safety at mines; mining within 100m from structures (silos), that must be protected; as well as those sections pertaining to rehabilitation of the surface.	C	During the audit it was confirmed that the appropriate necessary measures are taken to ensure that Greenside Colliery complies with the requirements of the Mine Health and Safety Act (Act 29 of 1996)
h)	The National Environmental Management: Waste Act (Act No. 59 of 2008)	C	During the audit it was confirmed that the appropriate necessary measures will be taken to ensure that Greenside Colliery complies with the requirements of the Waste Act (Act No. 59 of 2008).
8.2.1.19. Liability of the holder of this Authorisation			
a)	The competent authority shall not be held responsible for any damages or loses suffered by the holder or his/her successor in title in any instance where reclamation/construction or operation subsequent to the operation being temporarily or permanently stopped for reasons of non-compliance by the holder with conditions of approval as set out in the document or any other subsequent emanating from this Authorisation. The holder shall be responsible from all the costs necessary to comply with the above condition unless otherwise specified.	T/N	The condition is noted and accepted by Greenside Colliery.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
b)	Any complaint from the public during the life of mine must be attended to by the holder of this authorisation as soon as possible to the satisfaction of the parties concerned	C	The complaints register is available at the security entrance of the mine. The complaints register was availed during the audit and no complaints were received for the audit period (August 2023 - August 2024),
c)	The contractor must ensure that serviceable ablution facilities are available for employees.	T/N	During the site inspection, no serviceable ablution facilities were observed at the site.
8.2.2. MANAGEMENT OF THE ACTIVITY			
a)	A copy of the approved BAR and EMPR with the Environmental Authorisation and all other licenses and permits must always be available on site so as to monitor compliance with conditions outlined in all the documents. All documents must be used as on-site reference document during the life of mine.	C	An electronic copy of the Environmental Authorisation, approved BAR and EMPR was available at Greenside Colliery during the audit.
a)	All duties and responsibilities as outlined in the EA are binding throughout the life of the mine.	T/N	The condition is noted and accepted by Greenside Colliery.
a)	Any proposed amendments to the regulation 32 report (as a result of this Authorisation or otherwise) must be submitted in writing to this Department for approval prior to the amendment being implemented. On approval of the proposed amendment the EMP must be accordingly and adhered to.	T/N	The condition is noted and accepted by Greenside Colliery. No amendments were applied for the audit period (August 2023 -August 2024)
8.2.3. ENVIRONMENTAL CONTROL OFFICER			
a)	An Environmental Control Officer, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the approved BAR and EMPR, Environmental Authorisation and all other licenses and permits, prior to any commencement of mining activities on site must be appointed.	C	Greenside Colliery has appointed an Environmental Officer that is responsible for giving effect to the conditions of the EA, EMPr and WUL, including the monitoring and management of compliance.
b)	The Environment Control Officer appointed must monitor the construction of the infrastructure to ensure that the layout plans are in accordance to the designs and record important findings of the site inspection.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
c)	The Environment Control Officer must also monitor the implementation of specific elements of the Environmental Management Programme by contractors.	T/N	The condition falls outside of the scope of the audit period (August 2023 - August 2024). Construction activities are complete and Greenside Colliery is currently operational. No construction activities were observed during the site inspection.
d)	All duties and responsibilities as outlined in the EMPR are bidding throughout the life of project/mine.	T/N	The condition is noted and accepted by Greenside Colliery.
8.2.4. SITE CLOSURE AND DECOMMISSIONING			
a)	The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in the EMPR.	C	The activities conducted at Greenside Colliery are divided into construction, operation and decommissioning. Currently the site is in the operational phase and construction activities are completed.
b)	The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2402), as amended.	T/N	The condition is noted and accepted by Greenside Colliery.
c)	All mitigation measures for the decommissioning phase, as outlined in the EA. The holder of EA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of the operation.	T/N	The condition is noted and accepted by Greenside Colliery.
8.3. MONITORING			
8.3.1	This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in the Authorisation.	T/N	The condition is noted and accepted by Greenside Colliery.
8.3.2	The Environmental Mineral Resource Inspectors (EMIRs) of this Department may conduct an inspection at any time without any appointment and inspect all parts of the approved mining area. Please note that conducting mining and related activities outside the	T/N	The condition is noted and accepted by Greenside Colliery.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	approved EIA and EMPr together with the approved plan this will be considered as non-compliance and a notice will be issued to the company in terms of Section 31 of NEMA.		
8.3.3	It is the holder of this Authorisation's responsibility to ensure that an ongoing management and monitoring of the impacts of the activity on the environment throughout the life of the project is put into practice.	T/N	The condition is noted and accepted by Greenside Colliery.
8.3.4. WATER MONITORING			
8.3.4.1	The company must implement ground water monitoring on yearly basis in order to quantify impacts on ground water resources during construction, operation and decommissioning phases.	C	Groundwater monitoring is quarterly in accordance with the requirement of the WUL. The Annual Water Monitoring Reports was availed during the audit period.
8.3.4.2	Early warning leachate detection system, seepage interception trenches as well as controls shall be put in place to minimize the impacts of pollution and to allow timely control of contamination incidents.	C	Greenside Colliery implements various measures to prevent ground and surface water pollution, including: - Ongoing ground and surface water quality monitoring to detect surface and ground water pollution. - Updating and validation of the groundwater model. - Contain dirty water within the dirty water system for reuse in process or transferred to EWRP for treatment. - Water that does not meet requirement of the WUL is contained and prevented from discharging to or seep into the clean ground and surface water.
8.3.4.3	In the event that the ground water and downstream users are affected by migration of pollution from the mine residue deposits the company shall compensate such affected water users with portable water as directed by the responsible authority.	T/N	Greenstone Colliery reported that no incident or complaints were recorded in relation to effects on downstream users for the audit period (August 2023 - August 2024)
8.3.5. INVESTIGATIVE MONITORING			
8.3.5.1	If in the opinion of the responsible authority, a water quality variable listed under the detection monitoring programme, shows an increasing trend, the licence holder shall initiate a monthly monitoring programme until such time that the variable is within acceptable limits confirmed by the responsible authority.	T/N	The condition is noted and accepted by Greenside Colliery. No request of monthly water monitoring were received from the Department for the audit period (August 2023 - August 2024).
8.3.6. METHODS OF ANALYSIS			
8.3.6.1	The Licence Holder shall carry out all tests in accordance with methods prescribed by and obtainable from the South African Bureau of Standards (SABS), referred to in the standards Act ,2008 (Act 08 of 2008) , to analyse the samples taken under the monitoring programmes.	C	Greenside Colliery's appointed service provider undertakes water quality sampling and analysis in accordance with the code of practice contained in the SABS ISO 5667:1 – 15.
8.3.6.2	The Licence Holder shall only use another method of analysis if written proof that the method is at least equivalent to the SABS method and is confirmed by the responsible authority.	T/N	Greenside Colliery reported that no alternative method for sampling or analysing was required during the audit period (August 2023 - August 2024)
8.4. RECORDING AND REPORTING TO THE DEPARTMENT			
8.4.1. AUDITING			
8.4.1.1. Audit and Site Inspections			
a)	The Responsible authority reserves the right to audit and / or inspect the site at any time and at such a frequency as the responsible authority may decide, or to have the site audited or inspected.	T/N	The condition is noted and accepted by Greenside Colliery.
b)	The License Holder must take any records or documentation available to the responsible authority upon request, as well as any other information the responsible authority may require.	T/N	The condition is noted and accepted by Greenside Colliery.
8.4.2. REPORTING			
8.4.2.1	The Licence Holder must, within 24 hours, notify the responsible authority of the occurrence or detection of any incident of any incident on the site which has the potential to cause or has caused pollution.	T/N	The Emergency Preparedness and Response procedures was availed during the audit and provide the process for the managing and reporting pollution events as aligned to the EA and NEMA requirements. The list of incidents recorded for the audit period (August 2023 - August 2024) were

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			reviewed during the site inspection on Greenside Colliery's Enablon system and no reportable (medium or major) incidents were recorded.
8.4.2.2	The licence holder must, within 14 days, or a shorter period of time, if specified by the responsible authority, from the occurrence or detection of any incident to the responsible authority of measures taken to-Correct the impact resulting from the incident Prevent the incident from causing any further impacts; and Prevent a recurrence of a similar incident.	T/N	The Emergency Preparedness and Response procedures was availed during the audit and provide the process for the managing and reporting pollution events as aligned to the EA and NEMA requirements. The list of incidents recorded for the audit period (August 2023 - August 2024) were reviewed during the site inspection on Greenside Colliery's Enablon system and no reportable (medium or major) incidents were recorded.
8.4.2.3	In the event that measures have not been implemented within 21 days to address impacts caused by the incident or measures which have been implemented are inadequate, the responsible authority may implement the necessary measures at the cost and risk of the license holder.	T/N	The Emergency Preparedness and Response procedures was availed during the audit and provide the process for the managing and reporting pollution events as aligned to the EA and NEMA requirements. The list of incidents recorded for the audit period (August 2023 - August 2024) were reviewed during the site inspection on Greenside Colliery's Enablon system and no reportable (medium or major) incidents were recorded.
8.4.3. OTHER REPORTING			
8.4.3.1	The licence holder must submit a written report to the responsible authority regarding any deviations from plans described in this authorisation and must obtain written permission from the responsible authority before such deviations may be implemented.	T/N	The condition is noted and accepted by Greenside Colliery. No deviations from the environmental authorisation were required during the audit period (August 2023 - August 2024).
8.4.3.2	The authorisation holder must submit annual environmental audit report during the operation of the activity, unless otherwise requested by the competent authority. The audit report must convey the following: The date in which the audit was carried out The outcome of the audit, in relation to the conditions stipulated in environmental authorisation and the EMPR and the actions taken to mitigate environmental impacts on site.	C	Greenside appoints an external service provider to conduct annual compliance audits of its Environmental Authorisations and EMPR. The auditors were provided with the most recent annual external audit report titled "Greenside Colliery: External Audit Report (2022/ 2023)" compiled by NTC Group (Pty) Ltd.
8.4.3.3	Records of monitoring and/or auditing must be made available for inspection to this Department and any other relevant authority inspecting the development activities.	T/N	The condition is noted and accepted by Greenside Colliery.
	Records relating to compliance and non-compliance with the conditions of this must be kept in good order. Such records shall be made available to this Department within seven (7) days of receipt of a written request by the Department. Environmental	T/N	The condition is noted and accepted by Greenside Colliery.
8.4.3.4	All records relating to the implementation of the EMPR must be kept in the office where it is safe and can be retrievable.	C	Records relating to compliance with the Environmental Authorisation and EMPR are available at Greenside Colliery and managed in accordance with the site's certified ISO 14001: 14001 EMS.
8.5. NON-COMPLIANCE			
8.5.1	In the event of non-compliance by any contractor during the construction/operation of the authorised activity, the holder of this Authorisation will be liable.	T/N	The condition is noted and accepted by Greenside Colliery.
8.5.2	The holder shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	T/N	The condition is noted and accepted by Greenside Colliery.
8.5.3	The holder must in the event of non-compliance with any condition of this Authorisation inform the Regional Manager of Mpumalanga region of this Department, in writing, within forty-eight (48) hours.	T/N	The condition is noted and accepted by Greenside Colliery.
8.5.4	Non-compliance to this Authorisation is an offence as provided for in terms of the National Environmental Management Act, 1998, Section 49(a) and Regulation 48. Any conviction such offence may result in section 49(a) being enforced.	T/N	The condition is noted and accepted by Greenside Colliery.
9. APPEALS OF AUTHORISATION			
9.4.	The holder of the Authorisation must notify registered interested and affected party, in writing and within fourteen (14) days, of receiving the Department's decision. The notification must-	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024).
9.4.1	Specify the date on which the Authorisation was issued.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
9.4.2	Inform the registered interested and affected parties of the appeal procedure provided for in chapter 2 of the National Appeal Regulations of 2014.		
9.4.3	Advice the interested and affected parties that a copy of the Authorisation and reasons for the decision will be furnished on request.		
9.4.4	An appeal against the decision must lodged in terms of Chapter 2 of the National Appeal Regulations of 2014.		

TABLE 4. ENVIRONMENTAL MANAGEMENT PROGRAMME (SEPTEMBER 2021) APPROVED BY THE DEPARTMENT OF MINERALS AND ENERGY RESOURCES (MP 30/5/1/2/3/2/304 MR DATED 31 JANUARY 2022) FOR THE CONSOLIDATION AND AMENDMENT OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT TO INCLUDE THE PCD, DISCARD DUMP, RETREATMENT PLANT, EAST BLOCK UNDERGROUND MINING PROJECT AND THANDEKA VENTILATION SHAFT AT GREENSIDE COLLIERY

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
A. COAL DISCARD DUMP EXTENSION, RETREATMENT PLANT (FILTER PRESS), PCD, RLT AND THANDEKA SHAFT			
CONSTRUCTION PHASE			
1. ENVIRONMENTAL AWARENESS, ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL			
1.1	The overall responsibility for the environmental management and cost associated with the implementation of the EMP lies with Greenside Colliery.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.2	Greenside Colliery is to ensure that all permanent and temporary employees and contractors adhere to the EMP.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.3	Observations of non-compliance reported during the internal audits and incidents reported within the environmental incidents register are to be closed out by Greenside Colliery on approval of suitable rectification/mitigation measures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.4	Greenside Colliery must appoint a staff member directly involved in the construction activities as the environmental control officer (ECO).	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.5	The appointed ECO will be responsible for ensuring The continual implementation of the EMP. Monthly monitoring of activities to ensure compliance with the EMP. Ensuring environmental awareness among members of the workforce. Ensuring that all contractor(s) and members of the workforce (employees) are aware of the requirements of the EMP. Implementing preventative and corrective actions in accordance with the requirements of the EMP and outcomes of environmental audits and incidents reported within the environmental incidents register. Reporting of environmental incidents within the environmental incidents register that may occur on-site, in accordance with the requirements of the EMP and relevant environmental legislation.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.6	All contractors, sub-contractors, suppliers and employees must, Adhere to the EMP at all times. Provide evidence to the ECO that the EMP is being implemented and adhered to (through - biennial internal audit reports).	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.7	In terms of Section 2(h) and (j) of the NEMA and Section 2 of the MPRDA, Greenside Colliery has the responsibility to ensure all personnel involved in the project are aware of and familiar with the EMP, the key environmental issues associated with the retreatment plant and consequences of non-compliance to the EMP.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.8	The EMP forms part of the formal site induction for all contractors, sub-contractors and employees, preferably in their native language. The induction training will, as a minimum, include the following: The importance of conformance with all environmental policies. The environmental impacts, actual or potential, associated with the activities of the retreatment plant. The environmental benefits of improved personal performance. Their roles and responsibilities in achieving conformance with the company's existing environmental policy and procedures. The mitigation measures required to be implemented when carrying out work activities. The potential consequences of defying specified procedures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.9	All contractors, sub-contractors and employees must acknowledge their understanding of the EMP and environmental responsibilities by signing an induction attendance record.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.10	An environmental awareness programme shall be implemented for all on-site personnel describing the key environmental issues and potential impacts thereof.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.11	Greenside Colliery must take reasonable measures to prevent pollution or degradation of the environment from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
1.12	The appointed ECO is responsible for: Environmental incidents register. Close-out on incidents received. Monthly monitoring reports. Inductions training and register. Environmental awareness programme.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2. SITE CONSTRUCTION			
2.1. Site Establishment Commitments			
2.1.1	All EMP management and mitigation measures within this section (Section 3.2) are to be implemented in the event of establishment of the new construction area.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.2	The site selected for the establishment of the new construction area should ensure that potential impacts on the topography are kept to a minimum.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.3	The area to be disturbed by construction activities is to be kept to a minimum, only large enough to carry out the necessary activities.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.4	Access to and from the site should follow the existing road infrastructure where possible. These roads should also be maintained throughout the construction and operational phases. Deviations from the road are not permissible.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.5	Vegetation removed from the site establishment is to be kept to a minimum.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.6	Should temporary ablution facilities be required, they are to be placed at a specific point near the construction area, with a recommended maximum ratio of 15 workers to one ablution facility. The ablution facility should be removed after construction.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.7	Chemical toilet facilities must be placed in such a way that they do not cause water or other forms of pollution. Records should be maintained on-site of chemical toilet maintenance. The contents of chemical toilets will be removed to an approved disposal site – no discharge into the environment or burying of sewage will be permitted.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.8	The construction area should be kept in an orderly state at all times. Littering is prohibited.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.9	Fires will only be allowed in facilities specially constructed for this purpose within the construction boundary.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.10	No open fires or uncontrolled fires will be permitted on-site.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.11	Firefighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and firefighting measures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.1.12	The liberation of dust into the surrounding environment must be effectively controlled by the use of water spraying and/or other dust-allaying agents. The speed of vehicles must be strictly controlled to a maximum speed of 40km/h to avoid dangerous conditions, excessive dust or excessive deterioration of the roads.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.1.13	Haul roads are wetted and/or dust-a-side applied to control dust on the roads.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2. Soil, Land Use and Land Capacity			
2.2.1	Ensure that the area to be disturbed by construction activities is to be kept to a minimum, only large enough to carry out the necessary activities.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.2	The 3ML dam must be designed according to the design plan. The dam should be lined with a plastic lining of 2mm in thickness and should include a “Jacuzzi line” to be used during emergency conditions.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.3	Subsoil drainage is to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.4	The existing clean and dirty water separation system must be extended to include the proposed project to ensure that no contamination of clean water systems occurs.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.5	The clean and dirty water separation system should comply with National Water Act (No 36 of 1998) government notice regulation 704.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.6	A storm water management plan should be updated to include the new retreatment plant to ensure no contaminated storm water enters the environment.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.7	The mines existing emergency response plan should be upgraded to include activities associated with the retreatment plant.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.2.8	Equipment and Vehicle Storage Area:		
2.8.8.1	Areas of open ground that are to be utilised (i.e. equipment and vehicle storage) should be hard standing in the form of compacted gravel. Furthermore, a clean and dirty water separation system must be constructed to ensure that no contamination of clean water systems occurs. Should a spillage or leakage of a hydrocarbon, chemical or hazardous substance occur, the spill/leakage must be cleaned up as per Section 3.12: Spillage and Incidents.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.2	Small quantities (50 litres or less) of chemical and hazardous substances (oil, lubricant, etc) shall be stored in appropriate containers within a secure storage area. The base of the storage area should be impervious and designed to ensure that the contained substances do not infiltrate into the soil.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.3	Regular inspections of the integrity of all bund areas will be undertaken.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.4	Material Safety Data Sheets (MSDS) for on-site chemicals, hydrocarbons and hazardous substances must be readily available. A MSDS should include information pertaining to environmental impacts and measures to minimise and mitigate against any potential environmental impact which may result from a spill.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.5	Used fuels, oil, hydraulic fluids, paints, solvents, and grease should be stored in drums or other suitable containers and stored on a hard standing surface. These should be labelled, sealed and removed from the site to an appropriate disposal site or recycling facility. Under no circumstances will these substances be disposed of on-site or into the surrounding environment.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.6	No mixing or storing of concrete is permitted on areas where topsoil will be stockpiled. A designated area should be demarcated to prepare concrete in order to minimise soil contamination. The area should contain any potential runoff.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.7	Soils that may be contaminated during the construction and operational phases are to be removed to prevent the contamination of the soils, surrounding surface water or underlying groundwater. Contaminated soil must be removed from site as hazardous waste.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.8.8.8	All construction materials used may be temporarily stored on-site, but bags and containers should be sealed during storage.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.9	All leakages, spillages and incidents must be cleaned-up and reported as per Section 3.12: Spillage and Incidents.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.10	No vehicles or equipment may be repaired or washed on-site. All washing and repairing of vehicles and equipment is to be undertaken at the mine's vehicle maintenance yard.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.11	Temporary drip trays must be placed underneath vehicles or equipment that are leaking hydrocarbons until such a time that they are repaired.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.8.12	The liberation of dust into the surrounding environment must be effectively controlled by the use of water spraying and/or other dust-allaying agents. The speed of vehicles must be strictly controlled to a maximum speed of 40km/h to avoid dangerous conditions, excessive dust or excessive deterioration of the roads.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3. Fauna and Flora			
2.3.1	The extent of the area disturbed should be limited to construction areas thus preventing potential impacts on biodiversity.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3.2	Ensure no rare or endangered fauna or flora are removed or disturbed during the construction phase of the project. Should a rare or endangered species be identified, it is to be removed and relocated either to a nearby nursery or zoo, or near a proposed educational center for educational purposes following receiving the correct permit and/or license. Documentation and photographic evidence of this should be kept on-site for record purposes.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3.3	Weeds, alien plants and invasive vegetation must be removed should ingress occur. Category 1 (declared weeds) and Category 2 (declared invader plants with a value) according to the Conservation of Agricultural Resources Act (No. 43 of 1983) must be removed wherever possible.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3.4	No vegetation is to be collected for use as firewood.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3.5	Firefighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and firefighting measures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.3.6	Vehicle and machinery exhaust systems should be maintained to prevent excessive noise.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4. Surface and Groundwater Management			
2.4.1	The proposed 3ML dam is not to be constructed within the 1:100-year flood line or closer than 100 metres of the Greensidespruit.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.2	The extent of the area disturbed should be limited to construction areas thus minimising potential impacts on surface water.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.3	The dam must be designed according to the design plans. The dam should be lined with a plastic lining of 2mm in thickness and should include a "Jacuzzi line" to be used during emergency conditions.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.4	Subsoil drainage to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.5	The existing clean and dirty water separation system must be extended to include the proposed project to ensure that no contamination of clean water systems occurs.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.6	Areas of open ground that are to be utilised (i.e. equipment and vehicle storage) should be hard standing in the form of compacted gravel. Spills in this area are to be cleaned up with spill kits and any contaminated gravel to be scooped up and disposed of as hazardous waste.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.4.7	A storm water management plan should be updated to include the retreatment plant to ensure no contaminated storm water enters the environment.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.8	The mines existing emergency response plan should be upgraded to include activities associated with the retreatment plant.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.9	No discharge of pollutants such as contaminated water, cement, fuels or oils will be allowed into any water resource.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.10	Soils that may be contaminated during the construction and operational phases or from a failure, spillage or leakage of the dam or associated retreatment plant infrastructure are to be removed to prevent the contaminants of the soils, surrounding surface water or underlying groundwater.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.4.11	Soils that may be contaminated during the construction and operational phases or from a failure, spillage or leakage of the dam or associated retreatment plant infrastructure are to be removed to prevent the contaminants of the soils, surrounding surface water or underlying groundwater.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.5. Fire Prevention			
2.5.1	Fires will only be allowed in facilities specially constructed for this purpose.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.5.2	No uncontrolled fires will be permitted on-site.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.5.3	Firefighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and firefighting measures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.6. Air Quality			
2.6.1	The construction areas should undergo dust suppression when necessary.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.6.2	Dust entrainment from vehicular movement must be minimised by road wetting and by implementing speed limits.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.6.3	No burning of waste, such as plastic bags, cement bags and litter is permitted onsite.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.6.4	Ensure all equipment and vehicles are serviced regularly. Vehicle and machinery exhaust systems should be maintained to ensure integrity and reliability.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.6.5	An operations complaints register should be implemented whereby members of the public, authorities etc. are able to comment on air quality issues related to the construction. A formalised investigation and feedback procedure should also be included.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.7. Noise			
2.7.1	Ensure all equipment and vehicles are serviced regularly to prevent excessive noise. Vehicles and equipment generating excessive noise should be fitted with appropriate noise abatement measures.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.7.2	Construction workers must be provided with the appropriate personal protection equipment in areas required as per the Mine Health and Safety Act (No. 29 of 1996). Records of the PPE supplied must be maintained for record keeping purposes.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.7.3	A complaints register must be made available the site security office and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.7.4	Training and induction requirements must be undertaken as outlined in Section 3.1: Administration Requirements.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8. Sites of Archaeological and Cultural Significance			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.8.1	If an artefact or site of archaeological importance is uncovered on-site, work in the vicinity must be stopped immediately.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.2	Greenside Colliery must take reasonable precautions to prevent any person from removing or damaging any such article and must immediately, upon discovery thereof, inform the ECO of the discovery.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.3	The South African Heritage Resources Association (SAHRA) is to be contacted who will appoint an archaeological consultant.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.4	If a grave is uncovered on site, or discovered before the commencement of work, then all work in the immediate vicinity of the graves must be stopped and the ECO informed of the discovery.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.5	Work may only resume once clearance is given in writing by an archaeological consultant.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.8.6	The SAHRA should be contacted and in the case of graves, arrangements made for an undertaker to carry out exhumation and reburial.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.9. Waste Management Commitments			
2.9.1	The project site should be kept in an orderly state at all times. Littering is prohibited.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.9.2	Suitably covered receptacles must be available at all times and conveniently placed for the disposal of waste. These receptacles will be removed to the central salvage yard before being removed from site and disposed of by a permitted contractor at a licensed site. While being stored on-site, the receptacles should be placed within designated areas on an impermeable surface and must be correctly labelled and/or adequately colour coded.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.9.3	Under no circumstances is waste to be burnt or buried on-site.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.9.4	Records of hazardous waste being taken off-site must be kept as evidence.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.9.5	All leakages, spillages and incidents must be cleaned-up and reported as per Section 3.12: Spillage and Incidents.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10. Spillage and Incidents			
2.10.1	MSDS for on-site hydrocarbon, chemical and hazardous substances must be readily available. MSDSs should include information pertaining to environmental impacts and measures to minimise and mitigate against any potential environmental impact which may result from a spill or leakage.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.2	Ensure that areas containing chemical and hazardous substances are contained (e.g. in a bund) to ensure no contamination of surrounding water resources or soil is contaminated. The bunded area must be able to contain 110% of the total volume of materials stored at any given time.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.3	Small quantities (50 litres or less) of chemical and hazardous substances (oil, lubricant, etc) shall be stored in appropriate containers within a secure storage area. The base of the storage area should be impervious and designed to ensure that the contained substances do not infiltrate into the soil.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.4	If a spillage of a hydrocarbon, chemical or hazardous substance occurs, the resultant substance must be cleaned up as soon as practically possible using absorbent material provided in spill kits on-site and disposed of as hazardous waste.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.5	An incidents report must be completed should a spillage or leakage of a chemical, hydrocarbon or hazardous substance occur. Furthermore, an emergency preparedness	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	and response procedure must be updated to include the project site and provided should an incident or the spillage of a chemical, hydrocarbon or hazardous substance take place.		
2.10.6	All incidents must be reported to the responsible ECO as soon as it occurs.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.7	Regular inspections of the retreatment plant and associated infrastructure must be undertaken.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.8	Concrete mixing must be confined to as few areas as possible and ad hoc mixing is to be avoided. Furthermore, concrete mixing is to be undertaken on an impervious surface and any run-off contained.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.10.9	Should an incident occur the ECO must: Implement reasonable measures to contain and minimise the impacts of the incident; Notify all persons whose health may be affected by the incident; Notify the contractor who will advise on the measures that should be implemented; Undertake clean-up procedures immediately; and Record the incident in the Environmental Incident Register; and Implement preventative actions in order to prevent similar incidents from occurring in the future.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11. Socio-Economic Impacts			
2.11.1	All affected landowners, tenants, institutions, businesses and industries to be notified of the proposed retreatment plant prior to commencement.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.2	Issues and concerns raised by affected parties are to be recorded and resolved in a mutually agreeable manner in order to ensure social responsibility.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.3	As far as possible, local labourers will be appointed for skilled and semi-skilled positions.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.4	Principles of equality, Black Economic Empowerment (BEE), gender equality and non-discrimination must be implemented.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.5	Ensure all employees are supplied with the correct personal protective equipment	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.6	Employees must be trained in health and safety policies, environmental awareness, emergency preparedness, and HIV and AIDS.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.7	In-service training, where applicable, must be provided to employees.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.8	Ensure compliance to the Mine Health and Safety Act (No. 29 of 1996) requirements.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
2.11.9	A complaints register must be made available the site security office and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
3. MONITORING, REPORTING AND RECORD KEEPING			
3.1	Environmental monitoring will be undertaken by the ECO on a monthly basis (or as agreed to by Greenside Colliery) during the construction and operation phases.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
3.2	This monitoring will be undertaken in order to ensure compliance with all aspects or requirements of the EMP.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
3.3	The ECO is to inspect and monitor the operation and to implement the necessary actions to ensure compliance with the EMP.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
3.4	The ECO should report and discuss any difficulties with the implementation of the EMP with Greenside Colliery and the relevant government authority.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
3.5	Complaints received from the community, stakeholders or other affected parties, must be registered and recorded by the ECO and also brought to the attention of Greenside	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	Colliery. Both parties will respond accordingly. The following information must be recorded in the case of any complaint/incident: Time, date and nature of complaint; Response and investigation undertaken; and Corrective and preventative actions taken and by whom. All complaints should be closed-out within 14 days of the complaint received.		
3.6	All environmental incidents occurring on the site will need to be recorded in an environmental incident register. The following information must be provided: Time, date and nature of complaint; Response and investigation undertaken; and Corrective and preventative actions taken, and by whom. All incidents should be closed-out within 14 days of the complaint received.	N/A	Construction activities have been completed and Greenside Colliery is currently in operational phase as verified during the site inspection.
OPERATIONAL PHASE			
1. AIR QUALITY			
1.1. Releases to Atmosphere (Particulates - Dust)			
1.1.1	Haul roads are wetted and/or dust-a-side applied to control dust on the roads.	C	Greenside Colliery uses Dust-A-Side as a dust suppressive chemical to dust suppress the haul roads.
1.1.2	Mine adheres to the dust fall-out monitoring program.	C	Greenside colliery conducts monthly dust fallout monitoring at nine monitoring sites, which includes monitoring of PM10 and PM2.5. The most recent Air Quality Monitoring Results (2023), show that there were exceedances were recorded against residential or non-residential limits for the audit period (August 2023 - August 2024).
1.1.3	Personal dust monitoring is done by the Occupational Hygiene Department.	C	Greenside Colliery conducts the personal dust exposure monitoring per employee and per machine. The monitoring is only conducted for employees who are prone to experience high risk of dust. The monitoring report was availed during the audit.
1.2. Releases to Atmosphere: Gases/ Fumes			
1.2.1	All equipment is maintained regularly to reduce the emissions of unnecessary fumes.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
1.2.2	Appropriate PPE is available to employees and contractors for protection.	C	PPE is supplied to employees. PPE register is used for the issuance of PPE to employees and specific PPE is supplied for a specific job description. Contractors provide their own PPE. PPE registers were provided for review during the audit period.
1.2.3	MSDS sheets are available at all points of storage and usage for products in these areas.	C	Greenside Colliery reported that MSDS sheets are available at all points of storage and usage of chemicals.
1.2.4	A complaints register is available at the entrance and reception of the mine for public input.	C	The complaints register is available at the security entrance of the mine. The complaints register was availed during the audit and no complaints were received for the audit period (August 2023 - August 2024)
1.2.5	Scheduled stakeholder meetings take place to inform the public and to discuss issues.	C	Social and Labour Plan (dated 2019-2023) was availed during the audit and indicated the requirement for quarterly community forum meetings with surround communities and I&APs. Greenside Colliery's Environmental Department reported that a Environmental presentation is undertaken at the meeting the report on quarterly results on environmental performance, including air quality monitoring results.
2. ENERGY			
2.1. Energy Consumption: Fuel and Electricity			
2.1.1	To ensure better fuel efficiency, vehicles are regularly maintained and switched off when not in use.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
2.1.2	Energy KPIs are reported on in the Enablon database on a monthly basis. The indicators for 2010-2011 are 3% less than the previous year.	C	Greenside Colliery monitores and reports monthly energy KPI's on the Enablon System.
2.1.3	Greenside has implemented various energy saving projects such as the replacement of geysers with energy efficient models and the installation of day/night switches.	C	Greenside Colliery reported that the site monitors monthly energy consumption against the annual KPI target.
3. FIRE			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.1	Appropriate PPE is available to employees and contractors for protection. MSDS sheets are available at all points of storage and usage for products in these areas	C	PPE is supplied to employees. PPE register is used for the issuance of PPE to employees and specific PPE is supplied for a specific job description. Contractors provide their own PPE. PPE register was provided for review during the audit period. MSDS sheets are available at all points of storage and usage of chemicals. This was confirmed during the site visit.
3.2	All equipment is maintained regularly to reduce the emissions of unnecessary fumes.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
3.3	A protocol team is dispatched when a fire is reported. Fire extinguishers are kept at strategic points on the mine.	C	Greenside Colliery has a trained fire team and fire training certificates were provided to the auditors. During the site inspection, fire extinguishers were observed at strategic locations throughout the site.
4. FAUNA AND FLORA			
4.1. Loss of Fauna or Flora (Biodiversity)			
4.1.1	Continuously eradicate alien species and re-vegetate areas with indigenous species to ensure long-term sustainability.	NC 006	During the site inspection the spread of AIPs was observed at the Shaft Erickson Dam, the Oil fill-up area, the Village and Golf course Area, the Green Side East Exploration Boreholes and at the Ventilation Shaft. Greenside Colliery reported that an AIP has been developed and that a service provider is currently being sourced for the removal of AIPs.
4.2. Habitat Destruction or Gain			
4.2.1	Re-vegetate areas with indigenous species to ensure long-term sustainability.	C	Greenside Colliery's Vegetation Monitoring Procedure provides guidelines for the indigenous seed mixture to be used in re-vegetation during rehabilitation of disturbed areas. The seed mixture comprises a mix of <i>Eragrostis sp.</i> , <i>Cynodon dactyl</i> , <i>Chloris Gayana</i> and <i>Kiku sp.</i>
5. HEALTH AND SAFETY			
5.1. Structural Failure			
5.1.1	Stability of the dump is measured using the piezometer boreholes.	C	Greenside Colliery uses piezometer boreholes to check the stability of the dump. Slope stability analysis is undertaken on monthly basis where the stability of the dump is measured.
5.2. Personal Injury Exposure to Hazardous Substances			
5.2.1	Appropriate PPE is available to employees and contractors for protection. MSDS sheets are available at all points of storage and usage for products in these areas.	C	PPE is supplied to employees. A PPE register is used for the issuance of PPE to employees and specific PPE is supplied for a specific job description. Contractors provide their own PPE. PPE register was provided for review during the audit period. MSDS sheets are available at all points of storage and usage of chemicals. This was confirmed during the site visit.
5.3. Releases of Force (Explosions)			
5.3.1	All equipment is maintained regularly to reduce the emissions of unnecessary fumes.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
6. GROUNDWATER			
6.1	Subsoil drainage to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table.	T/N	The condition falls outside of the scope of the audit period (August 2023 - August 2024) The 3ML dam is not constructed as yet
6.2	Upgrade existing clean and dirty water separation system to include the Retreatment Plant. A stormwater management plan should be updated and implemented to include the new Retreatment Plant to ensure no contaminated stormwater enters the environment.	T/N	The condition falls outside the scope of the audit period (August 2023 - August 2024). The retreatment plant has not yet been constructed yet.
6.3	Water awareness is raised during induction and by means of posters and presentations during weekly Safety, Health and Environment (SHE) meetings. Burst and leaking water pipes are reported and fixed.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors.
6.4	Burst and leaking water pipes are reported and fixed.	C	Greenside Colliery uses an online SCADA system which provides real time from transmitted from its water reticulation system. Water volumes recorded by flow meters as well as pipeline water pressure are transmitted to the SCADA System which provides alerts when system malfunctions or equipment damage is detected.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
6.5	Spillages are cleaned up daily to minimise the impact on surface water, groundwater and soil quality. Spillages are managed according the coal and slurry spillage procedure.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
7. NOISE			
7.1	Equipment and vehicle exhaust systems should be maintained to prevent excessive noise. All operations must meet the noise standard requirements of the OHSA.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
7.2	A complaints register is available the site security office and should any complaints be received, these are be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	C	The complaints register is available at the security entrance of the mine. The complaints register was availed during the audit and no complaints were received for the audit period (August 2023 - August 2024)
7.3	Employees must be issued with appropriate Personal Protective Equipment.	C	PPE is supplied to employees. A PPE register is used for the issuance of PPE to employees and specific PPE is supplied for a specific job description. Contractors provide their own PPE. PPE register was provided for review during the audit period.
7.4	Employees and contractors wear earplugs (PPE) to protect themselves in noisy areas, which are clearly marked throughout the mine.	C	Earplugs are provided to employees to protect themselves in noisy areas and this is done using a PPE register. The PPE register indicating the issuance of PPE to employees was availed to the auditor.
8. SPILLS AND INCIDENTS			
8.1	Water awareness is raised during induction and by means of posters and presentations during the year. Burst and leaking water pipes are reported and fixed. Dams are inspected annually for its structural integrity	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors. Greenside Colliery uses an online SCADA system which provides real time from transmitted form its water reticulation system. Water volumes recorded by flow meters as well as pipeline water pressure are transmitted to the SCADA System which provides alerts when system malfunctions or equipment damage is detected.
8.2	Spontaneous combustion is minimized by encapsulation and compaction of the old discard dump.	C	Greenside Colliery reported that the old discard dump has been compacted to prevent incidents of spontaneous combustion. Thermal surveys are conducted twice a year at the current discard dump to identify any hot spots. If any hot spots are identified, the area is compacted to prevent spontaneous combustion. No spontaneous combustion has been reported for the audit period (August 2023 - August 2024).
8.3	Spillages are cleaned up daily to minimise the impact on surface water, groundwater and soil quality. Spillages are managed according to the coal and slurry spillage procedure.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
8.4	Oil traps are regularly cleaned and used oil is collected for recycling by an oil recycling company. Safe Disposal Certificates are available.	C	Greenside Colliery reported that the Oil traps are regularly cleaned and used oil is collected for recycling by an oil recycling company. No concerns were observed during the site inspection.
8.5	Spill absorbent kits and MSDSs are available in high risk oil and/or fuel spillages areas. Employees adhere to the oil/fuel spillage clean-up procedure to minimize the impact of spillages on surface and groundwater resources. Spills are contained using absorbents and/or sawdust to absorb the spill. The contaminated absorbent material is then disposed of as hazardous waste.	C	Greenside Colliery availed the "Oil/fuel spillage clean-up procedure" during the audit. The procedures provides the guidelines for the clean-up and management and disposal of contaminated material. During the site inspection, spill kits and MSDS were noted at the point of chemical storage.
9. SOCIO-ECONOMIC			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
9.1	Where possible skilled and unskilled labour are sourced locally within the municipality.	C	The Social and Labour Plan (dated 2019-2023) was availed during the audit and indicates that skilled and unskilled labour are sourced locally. The Social and Labour Plan also confirms Greenside Colliery's commitment to improving the livelihood of local communities.
9.2	Principles of equality, BBBEE, gender equality and non-discrimination are implemented.	C	The Social and Labour Plan (dated 2019-2023), developed for Greenside Colliery includes requirements for implementing BBBEE, gender equality and non-discrimination.
9.3	Employees are trained in health and safety policies, environmental awareness, emergency preparedness, and HIV and AIDS.	C	The "Greenside Colliery Induction - 2024" presentation was availed to the auditors, together with attendance registers for induction conducted during the audit period (August 2023 - August 2024). The induction includes health and safety policies, environmental awareness, and emergency preparedness. Weekly SHE Meetings are held at Greenside Colliery and include topics on HIV and Aids aspects.
9.4	In-service training, where applicable, are provided to employees.	C	The Social and Labour Plan (dated 2019-2023 was availed to the auditors and provides the requirements of in-service training to be provided to employees.
10. SURFACE WATER			
10.1	Water awareness is raised during induction and by means of posters and presentations during the year. Burst and leaking water pipes are reported and fixed.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors.
10.2	Areas are filled in according to the surface subsidence procedure.	C	Greenside Colliery's "Surface Subsidence Identification and Rehabilitation Procedure" indicate that areas which have been affected by surface subsidence must be immediately rehabilitated and the area must be made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have Subsided.
10.3	Wastewater/effluent is treated by the Greenside Sewage treatment plant and tested according to the DWA sewage effluent quality guideline. Allocate budget for the replacement of the deteriorated concrete area	C	Greenside Colliery's Sewage Treatment Works is managed by an contracted service provider, Regent Water. Regent Water conducts daily inspections of the Sewage Treatment Works infrastructure and undertakes daily monitoring of raw and treated wastewater quality in accordance with DWA sewage effluent quality guideline. The Sewage Treatment Works water quality data was availed to the auditors for review.
10.4	Dam levels are checked on a regular basis.	C	A SCADA system is used to check the dam levels on daily basis and the system is managed by at the mine's plant control room. The main PCD is fitted with a level indicator, which is displayed in the plant control room that is manned 24 hours. If the water level reaches 85% the pumps are started. Operation philosophy is such that the dam level should not be allowed to reach 85%, thus the pump is started on a regular basis to keep the level below 80%.
10.5	Greenside Colliery has an existing storm water management plan which is implemented and monitored regularly.	NC 001	The Storm Water Management Plan for Greenside Colliery (September 2024) was availed during the audit and is implemented at the site. However, during the site inspection inadequate drainage was observed which resulted in ponding: - Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area. - Water emanating from pavement washing was ponding at the Plant Fire tanks. Water generated at the Discard Silo area was flowing over the road and ponding within information gravity to the silt trap (WCDM).
10.6	Similarly, the clean and dirty water separation system is well maintained and regularly monitored including GNR 704 assessments.	NC 001	Greenside Colliery reported that the dirty water system was constructed and is operated in accordance with the designs approved as part of the EA and WUL applications. However, during the site inspection, ponding was observed due to inadequate drainage: - Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area. - Water emanating from pavement washing was ponding at the Plant Fire tanks.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			- Water generated at the Discard Silo area was flowing over the road and ponding within information gravity to the silt trap (WCDM). Obstructions of flow was observed within the dirty water system: - At the LDV Workshop, the trench along road and walkway was silted. - At the Diesel Filling Area, the sump was blocked. Inadequate drainage/ channelling and containment of dirty water in the dirty water system: - At the Oil Fill-up area, runoff from the walkway area was not contained and was observed to be channelled through a wall opening into uncontained, open area. - At the LHD Workshop, runoff at the down gradient area was bypassing the dirty water channel and discharging into an uncontained area. At the Rainbow Tank, water spillages was observed around refilling area (water from the PCD) and was not contained.
10.7	Further to the above regular surface and ground water monitoring and reporting thereof is completed by Greenside Colliery in line with the EMPR and WUL commitments.	C	Groundwater monitoring is conducted quarterly and surface water monitoring is conducted monthly in accordance with the requirements of the WUL. The Quarterly Water Monitoring Reports was availed during the audit period.
10.8	Water awareness is raised during induction and by means of posters and presentations during weekly Safety, Health and Environment (SHE) meetings.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors.
10.9	Burst and leaking water pipes are reported and fixed.	C	Greenside Colliery uses an online SCADA system which provides real time from transmitted form its water reticulation system. Water volumes recorded by flow meters as well as pipeline water pressure are transmitted to the SCADA System which provides alerts when system malfunctions or equipment damage is detected.
10.10	Water KPIs are reported on in the current database on a monthly basis.	C	Greenside Colliery monitors water usage KPIs and results are reported on the Enablon system on a monthly basis.
10.11	The indicators for 2010-2011 are 1.5% less than the previous year.	C	Greenside Colliery monitors water usage KPIs and results are reported on the Enablon system on a monthly basis. The target for water reduction is 1.5% less than the previous reporting annual period.
10.12	There is continuous awareness to save water.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors.
10.13	Suppress dust on cleared land.	C	Greenside Colliery uses Dust-A-Side as a dust suppressive chemical to dust suppress areas that generate dust.
10.14	The dirty water management area should be kept as small as possible.	C	All dirty water areas are contained within the dirty water system as per the approved footprint areas and kept as minimal as possible.
10.15	No dirty water should be allowed to leave the dirty water management area (except during an exceptional flood event, as per the GN.704, 1999 capacity requirements and only under Licence conditions).	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
10.16	Only clean or suitably treated water should be released or allowed to flow into the environment (depending on the catchment objectives and Licence conditions).	T/N	Greenside Colliery is not currently authorised to release water to the catchment.
10.17	Limit vehicle movement to designated roads wherever possible to prevent dust generation.	C	During the site inspection, vehicles 'movement was observed to be within designated areas and no off road driving was noted.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10.18	Ensure that stockpiling of ROM coal is only undertaken within the designated and purposefully constructed area.	C	During the site visit conducted, the ROM stockpile is was observed within the authorised location and no disturbance outside of the approved footprint areas was noted.
10.19	Ensure that contaminated runoff will be contained in the pollution control dams.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
10.20	Monitor water levels in the pollution control dams to ensure that it complies with GN704, 1999.	C	A SCADA system is used to check the dam levels on daily basis and the system is managed by at the mine's plant control room. The main PCD is fitted with a level indicator, which is displayed in the plant control room that is manned 24 hours. If the water level reaches 85% the pumps are started. Operation philosophy is such that the dam level should not be allowed to reach 85%, thus the pump is started on a regular basis to keep the level below 80%.
10.21	Monitor the dam walls of the pollution control dams for the nature of vegetation cover. Remove shrubs and trees from the dam wall. Ensure that the dam wall has grass cover to minimise erosion, but also that the grass cover do not damage liner.	C	During the site inspection, no shrubs or trees were observed at the pollution control dam walls. No concerns regarding vegetation growth and erosion were observed.
10.22	Berms and trenches must be monitored regularly to ensure they are not blocked.	C	Greenside Colliery reported that berms and trenches are monitored during monthly inspections conducted by Greenside Colliery Environmental Department.
10.23	Pumps should be regularly checked to ensure that they are functioning optimally.	C	Greenside Colliery uses an online SCADA system which provides real time from transmitted form its water reticulation system. Water volumes recorded by flow meters as well as pipeline water pressure are transmitted to the SCADA System which provides alerts when system malfunctions or equipment damage is detected.
10.24	Pipelines should be regularly monitored for leaks, and leaks patched so as to prevent spillage of water.	C	Greenside Colliery uses an online SCADA system which provides real time from transmitted form its water reticulation system. Water volumes recorded by flow meters as well as pipeline water pressure are transmitted to the SCADA System which provides alerts when system malfunctions or equipment damage is detected.
10.25	Ensure that the conveyor belt is covered for its full length to minimise dust generation.	C	During the site inspection, the conveyor belt was observed to be covered and enclosed at water crossings.
10.26	Ensure that haul trucks are covered with tarpaulins to minimise dust generation.	C	Greenside Colliery reported that Haul trucks leaving the site are required to be covered.
10.27	Spillages should be cleaned up immediately.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
10.28	Once the spillage has been cleaned up the areas where it might encounter soils should be tested and fertilised, if necessary.	C	Greenside Colliery reporting that no significant spillages occurred for the audit period (August 2023 - August 2024) and that spillage incidents could be adequately cleaned and contaminated soil removed. No testing of soils was required for the audit period.
10.29	Natural vegetation should be established on areas where the soils have been exposed during the clean-up.	C	Greenside Colliery's manages vegetation in accordance with its Vegetation Monitoring Procedure which guidelines for revegetation of exposed areas, including the recommended seed mix.
10.30	Monitor conveyor route to identify spillages.	C	Greenside Colliery reported that conveyor routes are monitored during monthly inspections conducted by Greenside Colliery Environmental Department. No coal spillages from the conveyors were noted during the site inspection.
10.31	Monitor water and only release water if the quality is sufficiently good (as per licence conditions and catchment requirements).	T/N	Greenside Colliery is not currently authorised to release water to the catchment.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10.32	Ensure that all the relevant permissions are obtained for the release of water into the catchment.	T/N	Greenside Colliery is not currently authorised to release water to the catchment.
10.33	Maintain sewage treatment works to ensure that it operates optimally.	C	Greenside Colliery's Sewage Treatment Works is maintained by an contracted service provider, Regent Water. Regent Water conducts daily inspections of the Sewage Treatment Works infrastructure and undertakes daily monitoring of raw and treated wastewater qualities and flow volumes. The water quality and flow volume data for the Sewage Treatment Works were availed during the audit.
10.34	Ensure designated pathways are allocated for vehicle movement to minimise compacted surfaces.	C	Access roads were developed in accordance with the approved mining layout. During the site inspection, vehicles movement was observed to be within the designated access roads and no off-road driving was observed.
10.35	No abstraction of water from surface water resources such as the stream or pan will take place; this will reduce the overall impact on the surface water yield.	C	Greenside Colliery does not abstract water from a stream or a pan.
10.36	Implement water conservation measures to reduce volumes of water usage.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate information on water management. Additionally, Induction Registers were provided for the audit period. Greenside Colliery's conducts weekly SHE meetings which include topics on water conservation and a copy was availed to the auditors.
10.37	The dirty water management area should be kept as small as possible.	C	Greenside Colliery reported that the dirty water system was constructed in accordance with the designs approved as part of the EA and WUL applications.
10.38	Ensure that subsided areas are free draining.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided.
10.39	Fertilise and vegetate damaged subsided areas to restore its pre-mining status if required.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided.
10.40	Rehabilitate subsidence and fracturing when it occurs: Design appropriate mitigation measures should this impact occur.		
10.41	Rehabilitate subsidence and fracturing when it occurs: Plough and rip fractures at the surface.		
10.42	Rehabilitate subsidence and fracturing when it occurs: Use cut and fill techniques to ensure that subsided areas are free draining.		
10.43	Rehabilitate subsidence and fracturing when it occurs: Fertilise and vegetate damaged subsided areas to restore its pre-mining status if required.		
10.44	Conserve natural plant species: Remove any invader plant species as soon as they are identified.	NC 006	During the site inspection the spread of AIPs was observed at the Shaft Erickson Dam, the Oil fill-up area, the Village and Golf course Area, the Green Side East Exploration Boreholes and at the Ventilation Shaft. Greenside Colliery reported that an AIP has been developed and that a service provider is currently being sourced for the removal of AIPs.
10.45	Conserve sensitive landscapes: Only discharge water that is clean.	N/A	No discharge of water is undertaken at Greenside Colliery. Therefore, this EMPr commitment is not applicable.
10.46	No abstraction of water from and discharging of water into pans or wetlands will occur.	T/N	Greenside Colliery reported that no water abstracted from nor discharged into pans or wetlands.
11. SOIL, LANDUSE AND CAPABILITY			
11.1	Defunct shafts are in the process of being capped and rehabilitated according to pre-mining land capability and topography.	C	Greenside Colliery's Annual Rehabilitation Plan requires that post closure topography must ensure that the area with affected topography is free-draining, returning the area to a useful post-mining topography and all disturbed areas are to be rehabilitated and re-vegetated using measures which will reinstitute surface drainage. Greenside Colliery will ensure that shafts are rehabilitated in compliance with Thungela Operation's Shaft Closure Procedure, which align to the requirement of the DMRE.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
11.2	Re-vegetate areas with indigenous species to ensure long-term sustainability.	C	Greenside Colliery's manages revegetation in accordance with its Vegetation Monitoring Procedure which provides guidelines for revegetation of exposed areas, including the recommended indigenous seed mix.
11.3	Continuous awareness of employees and contractors on fauna & flora in the Greenside wildlife sanctuary.	C	Greenside Colliery's "Environmental induction - 2024" was availed during the audit and provides adequate awareness of fauna and flora. Induction Attendance Registers were provided to the auditors to verify the induction undertaken during the audit period (August 2023 - August 2024)
12.. WASTE MANAGEMENT			
12.1	Employees and visitors adhere to the waste management procedure and waste separation strategy to minimise the impact of hazardous waste on water and soil.	NC 004	During the site inspection, hazardous waste bins were not covered and not in a contained area at the Permanent Contractors Managing Discard Dump and Shaft wash-bay.
12.2	All hazardous waste is disposed of in red waste bins in designated areas – bins contained in a bunded area with a concrete floor.	NC 004	During the site inspection, hazardous waste bins were not covered and not in a contained area at the Permanent Contractors Managing Discard Dump and Shaft wash-bay.
12.3	Spill kits are also available in these areas to contain any spillage which may occur	C	During the site inspection, spill kits were observed at chemical storage areas.
12.4	Safe disposal certificates are supplied to Greenside by the waste removal contractors.	C	Waste Manifests for the disposal of hazardous waste were availed during the audit. HAZCO Green Solutions CC is collects of hazardous waste from Greenside Colliery at disposed this at Holfontein Landfill site.
12.5	Blue waste bins are available for the disposal of scrap metal.	C	During the site inspection, scrap metals were stored at the salvage yard.
12.6	The scrap is then collected by a scrap metal dealer for recycling.	C	Greensides Colliery's "Waste Management Procedure" was availed during the audit, and the procedures requires that a responsible person from the shaft areas shall removes scrap metals to salvage yard.
12.7	And then collected by a scrap metal dealer for recycling.	C	Collection certificates were provided for review during the audit period.
12.8	Oil traps are regular cleaned and used oil is collected for recycling by an oil recycling company. Safe Disposal Certificates are available.	C	Greenside Colliery reported that Oil Traps are cleaned on a regular basis and that used oil is stored in sealed, labelled drums. Used oil is removed by eMalahleni Oil Collectors for recycling.
12.9	Redundant equipment, machinery and parts are sold or recycled as frequently as possible.	C	Greensides Colliery's sells redundant machinery, equipment and parts. Proof of collection was provided for review during the audit period.
12.10	Domestic waste is disposed of in yellow waste bins placed in designated areas.	NC 003	During the site inspection, poor waste management practices were observed: - Waste Littering was observed at the Oil Fill-up Area, LDV Parking Area, Shaft Surface Area, Permanent Contractors Managing Discard Dump and Engineering Workshops - Waste Mixing/ incorrect waste separation in waste receptacles was observed at the Underground Waste Storage Area, LDH Workshop and Shaft Surface Area - Building rubble was observed behind tanks at the Dust a side station and Out Bye Lay-down Area.
12.11	These bins are emptied on a regular basis and the contents disposed of at the Witbank Municipal dumpsite.	C	Domestics waste receptacles are collected when in full, by TL Ideas for disposal at Witbank Municipal dumpsite. Proof of disposal was availed during the audit.
12.12	Employees adhere to the waste management procedure.	NC 003 NC 004	During the site inspection, poor waste management practices were observed: - Waste Littering was observed at the Oil Fill-up Area, LDV Parking Area, Shaft Surface Area, Permanent Contractors Managing Discard Dump and Engineering Workshops - Waste Mixing/ incorrect waste separation in waste receptacles was observed at the Underground Waste Storage Area, LDH Workshop and Shaft Surface Area - Building rubble was observed behind tanks at the Dust a side station and Out Bye Lay-down Area - Hazardous waste bins were not covered and not in a contained area at the Permanent Contractors Managing Discard Dump and Shaft wash-bay.
12.13	Paper is disposed of in paper recycling boxes placed at strategic points.	C	During the site inspection, white waste receptacles for paper recycling was observed.
12.14	It is then removed by a paper recycling company for recycling.	C	Paper is collected TL Ideas when the bins are full.
13. VISUAL			
13.1	Spillages are cleaned up daily to minimise the impact on surface water, groundwater and soil quality. Spillages are managed according to the coal and slurry spillage procedure.	NC 005	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			However, during the site inspection, various hydrocarbon spills were observed around the site. Hydrocarbon spill were noted at the Dust a side station's Diesel Bowser, on the ground areas at the Oil fill-up, at the parking area of the Permanent Contractors Managing Discard Dump and at the Engineering Workshops.
13.2	Defunct shafts are in the process of being capped and rehabilitated according to pre-mining land capability and topography.	C	Greenside Colliery's Annual Rehabilitation Plan requires that post closure topography must ensure that the area with affected topography is free-draining, returning the area to a useful post-mining topography and all disturbed areas are to be rehabilitated and re-vegetated using measures which will reinstitute surface drainage. Greenside Colliery will ensure that shafts are rehabilitated in compliance with Thungela Operation's Shaft Closure Procedure, which align to the requirement of the DMRE.
B. UNDERGROUND MINING OF COAL: WATERPAN MINING AREA			
CONSTRUCTION PHASE			
1. LAND CAPABILITY			
1.1	All mitigation measures applied on soils will mitigate and improve post-mining land capability.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
2. VEGETATION			
1.2	All mitigation measures applied on soils will assist in mitigation impacts to vegetation.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
3. AIR QUALITY			
3.1	Wet suppression where feasible on stockpiles and materials handling activities.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
3.2	Wet suppression or chemical stabilization of unpaved roads.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
3.3	Haul trucks to be restricted to specified haul roads.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
3.4	Reduction of unnecessary traffic.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
3.5	Strict speed control.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
4. NOISE			
4.1	Use machinery only as required.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
4.2	Ensure machinery is well maintained to minimise the effects of the impact of noise generation.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
5. SOCIO-ECONOMIC IMPACTS			
5.1	Wherever jobs become available, local labour should be sourced.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
6. INTERESTED AND AFFECTED PARTIES			
6.1	Mitigation measures as indicated in the above sections should be implemented. In addition, communication with I&APs will minimise the severity of the impact on them.	N/A	Construction activities have been completed and Greenside Colliery 's underground mine is currently in operation.
OPERATIONAL PHASE			
1. GEOLOGY			
1.1	Removal of material should be limited to only coal and material that must be removed to access the coal.	C	Greenside Colliery undertakes its mining of its coal reserves by underground mining using mechanical continuous mining techniques. A bord and pillar method of mining; employing the Salmon's formula for pillar safety factors is employed. The safety factor is used to determine the

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			amount of coal to be removed and left as pillars, which ensure that the pillars would not fail. A mining plan was provided during the audit period.
1.2	High extraction underground mining methods will not be utilised, therefore, there is lower chance of surface subsidence occurring.	C	High extraction underground mining methods are not utilised at Greenside Colliery. Greenside Colliery extract coal using the bord and pillar mining method.
1.3	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
2. TOPOGRAPHY			
2.1	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	No subsidence occurred during the audit period (August 2023 - August 2024). Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
3. LAND CAPABILITY			
3.1	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	No subsidence occurred during the audit period (August 2023 - August 2024). Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
4. VEGETATION			
4.1	Ensure that sufficient pillars remain in the underground mine that the upper soil strata do not subside	C	Reconciliation of the designs is done on a monthly basis whereby the actual achieved pillar geometries are checked and the achieved parameters (Safety Factors and Probabilities of Stability) are reconciled with the original designs. This reconciliation process then results in corrective actions to ensure that subsidence is prevented on the operation.
4.2	Areas of untransformed habitat above underground mining zones should be regularly monitored to ensure that subsidence is not taking place. If this is detected, then individual plants of Declining species should be relocated to adjacent similar habitat	C	Monitoring of the surface area above the underground mining area is monitored on monthly basis by the Greenside Colliery Environmental Department.
4.3	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	No subsidence occurred during the audit period (August 2023 - August 2024). Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
5. FAUNA			
5.1	Ensure that sufficient pillars remain in the underground mine that the upper soil strata do not subside.	C	Reconciliation of the designs is done on a monthly basis whereby the actual achieved pillar geometries are checked and the achieved parameters (Safety Factors and Probabilities of Stability) are reconciled with the original designs. This reconciliation process then results in corrective actions to ensure that subsidence is prevented on the operation.
5.2	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	No subsidence occurred during the audit period. Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
6. SURFACE WATER			
6.1	All active and "dirty" areas to form part of the dirty water management area.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications.
6.2	This area to be separated from the clean water management area by berms and canals.	N/A	The Waterpan area is an underground mining operation, and no berms/ canals are installed underground.
6.3	No surface water from the dirty footprint area is to be discharged into the environment, instead impacted mine water will be directed to the appropriate pollution control dam.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
6.4	The mine water balance will be managed.	C	The "Thungela Resources Greenside Colliery Water Balance Report" (January 2024) compiled by WSP, was availed to the auditors and provides the loads of waste emanating from the mines activities. Additionally, Greenside Colliery participate in the Upper Olifants River Catchment Forum, which coordinates water users in the management of water resources and ecosystem services as verified in the "Quarterly Olifants River Forum Executive Committee Meeting: Attendance Registers and 23 May 2024.
6.5	Containment of all dirty water generated underground by pumping to lined PCDs sized to have a risk of spill of 2% or less in any one year.	C	According to the Greenside Colliery Water Balance, dirty water generated from the underground workings is pumped to the new PCD with excess water from the workings also pumped to the eMalahleni Water Reclamation Plant (EWRP).
6.6	Treatment of excess dirty water for reuse at the operations.	C	Dirty water from the underground workings is pumped to the eMalahleni Water Reclamation Plant (EWRP) where the water is treated, and it supplies Greenside Colliery with potable water. The potable water is also used in the No.4 seam underground working for drinking water, and as makes up water for the mining activities. The water from the eMalahleni Water Reclamation Plant also supplies Greenside Colliery with process water, which is stored in the Plant Erickson dams. The process water is used for coal beneficiation and washing down in the coal beneficiation plants. Furthermore, dirty water from the underground workings is also pumped to new PCD thereafter to the Erickson Dams 1 and 2 for re-use in the Greenside Colliery Coal Washing Plant.
6.7	Pumping of excess water that cannot be treated or reused to storage in old underground compartments.	C	All excess water from the underground workings is pumped to the eMalahleni Water Reclamation Plant and to the new PCD for further treatment and re-use and no underground storage compartments are used for the storage of excess water. Underground water in mined out and sealed workings is however allowed to naturally accumulate in the workings.
6.8	Provision of water management facilities with a risk of spill that is lower than 2% in any one year.	C	The new PCD is lined with a 1.0 mm thick HDPE lining with an underdrain system for leakage detection and with a capacity to store 60,864m ³ of dirty water.
6.9	A surface water quality monitoring programme will be implemented to detect any impacts.	C	Greenside Colliery's conducts surface water monitoring on a monthly basis and the most recent results were availed during the audit. The water quality results indicate that the monitoring points located close to the Waterpan area have not exceeded the water quality limits set out in the WUL.
7. GROUNDWATER			
7.1	If the monitoring program indicates that nearby groundwater users are affected by the dewatering, the users need to be compensated for the loss.	C	Greenside Colliery reported that no complaints have been received from surrounding water users for the audit period (August 2023 - August 2024) and no alternative water source is provided to any water users. Furthermore, the latest Groundwater Monitoring Report. (groundwater levels) did not give any indication of any groundwater users being affected by the dewatering activities.
8. AIR QUALITY			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.1	Regular water sprays preferably combined with chemicals on unpaved haul roads to ensure at least 75% control efficiency.	C	Greenside Colliery uses Dust-A-Side as a dust suppressive chemical on unpaved roads.
8.2	Speed limit on haul roads not to exceed 40 km/hr.	C	Speed limit signage of 40 km/ hr was observed during the site inspection.
9. NOISE			
9.1	Use machinery only as required.	C	Greenside Colliery reported that machinery is used only as and when required.
9.2	Ensure machinery is well maintained to minimise the effects of the impact of noise generation.	C	Machinery used is maintained on weekly basis. Proof of weekly maintenance inspection was provided for review during the audit period.
10. SENSITIVE LANDSCAPES			
10.1	Prevent surface subsidence by making use of a sufficient pillar safety factor during bord-and-pillar mining.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
10.2	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	Greenside Colliery reported that no areas of subsidence were reported during the audit period (August 2023 - August 2024), Greenside Colliery's Surface Subsidence Identification and Rehabilitation Procedure indicates that areas affected by surface subsidence are immediately rehabilitated and made free draining. Furthermore, Greenside Colliery conducts stability analysis over the underground workings to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have Subsided.
10.3	Prevent surface subsidence by making use of a sufficient pillar safety factor during bord-and-pillar mining.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
10.4	High extraction underground mining methods will not be utilised, therefore, there is lower chance of surface subsidence occurring.	C	Greenside Colliery reported that high extraction underground mining methods are not employed. Greenside Colliery extract coal using the bord and pillar mining method.
10.5	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	Greenside Colliery reported that no areas of subsidence were reported during the audit period (August 2023 - August 2024), Greenside Colliery's Surface Subsidence Identification and Rehabilitation Procedure indicates that areas affected by surface subsidence are immediately rehabilitated and made free draining. Furthermore, Greenside Colliery conducts stability analysis over the underground workings to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have Subsided.
11. VISUAL			
11.1	Ensure that the safety factor used in mining is sufficient to ensure stability of the land after mining.	C	Reconciliation of the designs is done on a monthly basis whereby the actual achieved pillar geometries are checked and the achieved parameters (Safety Factors and Probabilities of Stability) are reconciled with the original designs. This reconciliation process then results in corrective actions to ensure stability of the land after mining.
11.2	Subsided areas should be rehabilitated as soon as possible after subsidence, it should be ensured that such areas are free draining.	C	Greenside Colliery reported that no areas of subsidence were reported during the audit period (August 2023 - August 2024), Greenside Colliery's Surface Subsidence Identification and Rehabilitation Procedure indicates that areas affected by surface subsidence are immediately rehabilitated and made free draining. Furthermore, Greenside Colliery conducts stability analysis over the underground workings to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have Subsided.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
12. REGIONAL SOCIO-ECONOMIC IMPACTS			
12.1	Wherever jobs become available, local labour should be sourced	C	Greenside Colliery's Social and Labour was availed during the audit and indicates that skilled and unskilled labour are sourced locally. The Plan confirms Greenside Colliery's commitment to uplifting the livelihood of local communities.
13. INTERESTED AND AFFECTED PARTIES			
13.1	Mitigation measures as indicated in the above sections should be implemented. In addition, communication with I&APs will minimise the severity of the impact on them.	C	Social and Labour Plan (dated 2019-2023) was availed during the audit and indicated the requirement for quarterly community forum meetings with surround communities and I&APs. Greenside Colliery's Environmental Department reported that a Environmental presentation is undertaken at the meeting the report on quarterly results on environmental performance, including air quality monitoring and water quality monitoring results.
C. COAL DISCARD DUMP EXTENSION AND RETREATMENT PLANT ACTIVITIES			
CONSTRUCTION PHASE			
1. ENVIRONMENTAL AWARENESS, ROLES AND RESPONSIBILITIES FOR ENVIRONMENTAL MANAGEMENT			
1.1	The overall responsibility for the environmental management and cost associated with the implementation of the EMP lies with Greenside Colliery.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.2	Greenside Colliery is to ensure that all permanent and temporary employees and contractors adhere to the EMP.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.3	Observations of non-compliance reported during the internal audits and incidents reported within the environmental incidents register are to be closed out by Greenside Colliery on approval of suitable rectification/mitigation measures.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.4	Greenside Colliery must appoint a staff member directly involved in the construction activities as the designated environmental coordinator (DEC).	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.5	Designated Environmental Coordinator (DEC) will be responsible for ensuring: The continual implementation of the EMP. Monthly monitoring of activities to ensure compliance with the EMP Ensuring environmental awareness among members of the workforce; Ensuring that all contractor(s) and members of the workforce (employees) are aware of the requirements of the EMP; Implementing preventative and corrective actions in accordance with the requirements of the EMP and outcomes of environmental audits and incidents reported within the environmental incidents register. Reporting of environmental incidents within the environmental incidents register that may occur on-site, in accordance with the requirements of the EMP and relevant environmental legislation. In terms of Section 2(h) and (j) of the NEMA and Section 2 of the MPRDA, Greenside Colliery has the responsibility to ensure all personnel involved in the project are aware of and familiar with the EMP, the key environmental issues associated with the pollution control dam and consequences of non-compliance to the EMP.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.6	The EMP forms part of the formal site induction for all contractors, sub-contractors and employees, preferably in their native language. The induction training will, as a minimum, include the following: The importance of conformance with all environmental policies; The environmental impacts, actual or potential, associated with the activities of the pollution control dam; The environmental benefits of improved personal performance; Their roles and responsibilities in achieving conformance with the company's existing environmental policy and procedures; The mitigation measures required to be implemented when carrying out work activities; and The potential consequences of defying specified procedures.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.7	All contractors, sub-contractors and employees must acknowledge their understanding of the EMP and environmental responsibilities by signing an induction attendance record.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.8	An environmental awareness programme shall be implemented for all on-site personnel describing the key environmental issues and potential impacts thereof.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.9	Greenside Colliery must take reasonable measures to prevent pollution or degradation of the environment from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
1.10	Designated Environmental Coordinator Environmental incidents register (to be updated in Greenside Colliery's EMS).Environmental incidents register. Close-out on incidents received. Monthly monitoring reports. Inductions training and register.	N/A	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
2. SITE CONSTRUCTION			
2.1	All EMP management and mitigation measures within this section are to be implemented in the event of establishment of the new construction area.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.2	The site selected for the establishment of the new construction area should ensure that potential impacts on the topography are kept to a minimum.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.3	The area to be disturbed by construction activities is to be kept to a minimum, only large enough to carry out the necessary activities.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.4	Access to and from the site should follow the existing road infrastructure where possible. These roads should also be maintained throughout the construction and operational phases. Deviations from the road are not permissible.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.5	Vegetation removed from the site establishment is to be kept to a minimum.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.6	Should temporary ablution facilities be required, they are to be placed at a specific point near the construction area, with a recommended maximum ratio of 15 workers to one ablution facility. The ablution facility should be removed after construction.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.7	Chemical toilet facilities must be placed in such a way that they do not cause water or other forms of pollution. Records should be maintained on-site of chemical toilet maintenance. The contents of chemical toilets will be removed to an approved disposal site – no discharge into the environment or burying of sewage will be permitted.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.8	The construction area should be kept in an orderly state at all times. Littering is prohibited.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.9	Fires will only be allowed in facilities specially constructed for this purpose within the construction boundary. If required by applicable legislation, a fire-break must be cleared around the perimeter of the site	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.10	No open fires or uncontrolled fires will be permitted on-site.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.11	Fire-fighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and fire-fighting measures.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.12	The liberation of dust into the surrounding environment must be effectively controlled by the use of water spraying and/or other dust-allaying agents. The speed of vehicles must be strictly controlled to a maximum speed of 40km/h to avoid dangerous conditions, excessive dust or excessive deterioration of the roads.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
2.13	Surface and groundwater impacts must be managed as per the Surface and Groundwater Management measures described.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.14	Ensure all spillages are remedied.	N/A	The access road and the discard dump expansion are in the operational phase and no construction activities were undertaken during the audit period, therefore this EMPr commitment is not applicable. The retreatment plant has not yet been constructed.
2.15	On completion of all operational activities, the areas must be rehabilitated as per Section 3.15: Rehabilitation. Photographs of the pollution control dam project, before and during the operation as well as at closure and rehabilitation, must be taken at selected fixed points and kept on record. Environmental incidents register (to be updated in Greenside Colliery's EMS). Close-out on incidents received. Monthly monitoring reports Inductions training and register. Environmental awareness programme. .	N/A	The access road and the discard dump expansion are in the operational phase and no construction activities were undertaken during the audit period, therefore this EMPr commitment is not applicable. The retreatment plant has not yet been constructed.
3. TOPOGRAPHY			
3.1	Ensure that the area to be disturbed by construction activities is to be kept to a minimum, only large enough to carry out the necessary activities.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
3.2	Topsoil removed from the construction area must be stockpiled in a designated area. The stockpile shall be located away from seepage zones, flood lines, water courses and other ecological sensitive areas.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
3.3	Ensure stockpiles do not exceed a height of two metres.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
3.4	Should these stockpiles become a source of windblown dust, they must be covered by plastic sheeting or revegetated with indigenous vegetation.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
3.5	All alien invasive flora should be removed from the stockpiles.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
3.6	On completion of all operations, the areas must be rehabilitated as per Section 3.15: Rehabilitation. Environmental incidents register (to be updated in Greenside Colliery's EMS). Complaints Register (to be updated in Greenside Colliery's EMS). Close-out on incidents received.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4. SOIL, LAND USE AND LAND CAPABILITY			
4.1	Ensure that the area to be disturbed by construction activities is to be kept to a minimum, only large enough to carry out the necessary activities.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.2	The pollution control dam must be designed according to the design plans (available in the main Basic Assessment Report: Appendix C). The dam should be lined with a plastic lining of 2mm in thickness and should include a "Jacuzzi line" to be used during emergency conditions.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.3	Subsoil drainage is to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.4	The existing clean and dirty water separation system must be extended to include the proposed project to ensure that no contamination of clean water systems occurs. The clean and dirty water separation system should comply with National Water Act (No 36 of 1998) government notice regulation 704.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.5	A storm water management plan should be updated to include the new Retreatment Plant to ensure no contaminated storm water enters the environment.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.6	The mines existing emergency response plan should be upgraded to include activities associated with the Retreatment Plant.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1. Equipment and Vehicle Storage Area:			
4.1.1	Areas of open ground that are to be utilised (i.e. equipment and vehicle storage) should be hard standing in the form of compacted gravel. Furthermore, a clean and dirty water separation system must be constructed to ensure that no contamination of clean water systems occurs. Should a spillage or leakage of a hydrocarbon, chemical or hazardous	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	substance occur, the spill/leakage must be cleaned up as per Section 3.12: Spillage and Incidents.		
4.1.2	Ensure that areas containing chemical and hazardous substances are contained (e.g. in a bund) to ensure no contamination of surrounding water resources or soil is contaminated.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.3	The bunded area must be able to contain 110% of the total volume of materials stored at any given time	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.4	Small quantities (50 litres or less) of chemical and hazardous substances (oil, lubricant, etc) shall be stored in appropriate containers within a secure storage area. The base of the storage area should be impervious and designed to ensure that the contained substances do not infiltrate into the soil.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.5	Regular inspections of the integrity of all bund areas will be undertaken.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.6	Material Safety Data Sheets (MSDS) for on-site chemicals, hydrocarbons and hazardous substances must be readily available.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.7	A MSDS should include information pertaining to environmental impacts and measures to minimise and mitigate against any potential environmental impact which may result from a spill.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.8	Used fuels, oil, hydraulic fluids, paints, solvents, and grease should be stored in drums or other suitable containers and stored on a hardstanding surface. These should be labelled, sealed and removed from the site to an appropriate disposal site or recycling facility. Under no circumstances will these substances be disposed of on-site or into the surrounding environment.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.9	No mixing or storing of concrete is permitted on areas where topsoil will be stockpiled. A designated area should be demarcated to prepare concrete in order to minimise soil contamination. The area should contain any potential runoff	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.10	Soils that may be contaminated during the construction and operational phases are to be removed to prevent the contamination of the soils, surrounding surface water or underlying groundwater. Contaminated soil must be removed from site as hazardous waste.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.11	All construction materials used may be temporarily stored on-site, but bags and containers should be sealed during storage.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.12	All leakages, spillages and incidents must be cleaned-up and reported as per Section 3.12: Spillage and Incidents.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.13	No vehicles or equipment may be repaired or washed on-site. All washing and repairing of vehicles and equipment is to be undertaken at the mine's vehicle maintenance yard.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.14	Temporary drip trays must be placed underneath vehicles or equipment that are leaking hydrocarbons until such a time that they are repaired.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.15	The liberation of dust into the surrounding environment must be effectively controlled by the use of water spraying and/or other dust-allaying agents. The speed of vehicles must be strictly controlled to a maximum speed of 40km/h to avoid dangerous conditions, excessive dust or excessive deterioration of the roads.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.16	On completion of all operations, the areas must be rehabilitated as per Section 3.15: Rehabilitation.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
4.1.17	Environmental incidents register (to be updated in Greenside Colliery's EMS); Complaints register (to be updated in Greenside Colliery's EMS). Close-out on incidents received. Monthly monitoring reports. Bund audit reports / Inspection checklists.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5. FAUNA AND FLORA			
5.1	The extent of the area disturbed should be limited to construction areas thus preventing potential impacts on biodiversity.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.2	Ensure no rare or endangered fauna or flora are removed or disturbed during the construction phase of the project. Should a rare or endangered species be identified, it is to be removed and relocated either to a nearby nursery or zoo, or near a proposed educational centre for educational purposes following receiving the correct permit and/or license. Documentation and photographic evidence of this should be kept on-site for record purposes.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.3	Weeds, alien plants and invasive vegetation must be removed should ingress occur. Category 1 (declared weeds) and Category 2 (declared invader plants with a value) according to the Conservation of Agricultural Resources Act (No. 43 of 1983) must be removed wherever possible.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.4	No vegetation is to be collected for use as firewood.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.5	Fire-fighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and fire-fighting measures.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.6	Vehicle and machinery exhaust systems should be maintained to prevent excessive noise.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
5.7	Environmental incidents register (to be updated in Greenside Colliery's EMS): Close-out on incidents received. Monthly monitoring reports Inductions training and register. Environmental awareness programme.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6. SURFACE AND GROUNDWATER MANAGEMENT			
6.1	The proposed 3ML dam is not to be constructed within the 1:100 year floodline or closer than 100 metres of the Greenside spruit.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.2	The extent of the area disturbed should be limited to construction areas thus minimising potential impacts on surface water.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.3	The dam must be designed according to the design plans. The dam should be lined with a plastic lining of 2mm in thickness and should include a "Jacuzzi line" to be used during emergency conditions.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.4	Subsoil drainage to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.5	The existing clean and dirty water separation system must be extended to include the proposed project to ensure that no contamination of clean water systems occurs. The clean and dirty water separation system should comply with government notice regulation 704.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.6	A storm water management plan should be updated to include the Retreatment Plant to ensure no contaminated storm water enters the environment.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.7	The mines existing emergency response plan should be upgraded to include activities associated with the Retreatment Plant.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.8	No discharge of pollutants such as contaminated water, cement, fuels or oils will be allowed into any water resource.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
6.9	Regular inspections of the area and associated infrastructure must be undertaken to ensure no leakages occur.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
7. GROUNDWATER			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
7.1	Soils that may be contaminated during the construction and operational phases or from a failure, spillage or leakage of the pollution control dam are to be removed to prevent the contaminants of the soils, surrounding surface water or underlying groundwater.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
7.2	Two boreholes are to be installed at the pollution control dam; one above the pollution control dam and one below to monitor potential contamination from the dam.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
7.3	These boreholes are to be monitored quarterly	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
7.4	Should a contamination plume be identified, the source must be identified and emergency response and prevention measures implemented.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
8. GENERAL			
8.1	All leakages, spillages and incidents must be cleaned-up and reported as per Section 3.12: Spillage and Incidents.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
8.2	Environmental incidents register (to be updated in Greenside Colliery's EMS). Complaints register (to be updated in Greenside Colliery's EMS). Remedial action plan. Close-out on incidents received. Monthly monitoring reports.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
9. FIRE PREVENTION			
9.1	Fires will only be allowed in facilities specially constructed for this purpose.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
9.2	No uncontrolled fires will be permitted on-site.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
9.3	Firefighting measures, such as fire extinguishers, must be located on-site and the workforce must be made aware of fire prevention and firefighting measures. The workforce must be made aware of fire prevention and firefighting measures. Firefighting measures (extinguishers).Environmental incidents register (to be updated in Greenside Colliery's EMS).Complaints register (to be updated in Greenside Colliery's EMS).Close-out on incidents received.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
10. AIR QUALITY			
10.1	The construction areas should undergo dust suppression when necessary.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
10.2	Dust entrainment from vehicular movement must be minimised by road wetting and by implementing speed limits.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
10.3	No burning of waste, such as plastic bags, cement bags and litter is permitted on-site.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
10.4	Ensure all equipment and vehicles are serviced regularly. Vehicle and machinery exhaust systems should be maintained to ensure integrity and reliability.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
10.5	An operations complaints register should be implemented whereby members of the public, authorities etc. are able to comment on air quality issues related to the construction. A formalised investigation and feedback procedure should also be included: Environmental incidents register (to be updated in Greenside Colliery's EMS). Complaints register (to be updated in Greenside Colliery's EMS).Close-out on incidents received. Monthly monitoring reports. Annual Air Quality monitoring.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
11. NOISE			
11.1	Ensure all equipment and vehicles are serviced regularly to prevent excessive noise. Vehicles and equipment generating excessive noise should be fitted with appropriate noise abatement measures.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
11.2	Construction workers must be provided with the appropriate personal protection equipment in areas required as per the Mine Health and Safety Act (No. 29 of 1996). Records of the PPE supplied must be maintained for record keeping purposes.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
11.3	A complaints register must be made available the site security office and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
11.4	Training and induction requirements must be undertaken as outlined in the Administration Requirements above	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
11.5	On completion of all operations, the areas must be rehabilitated as per Section 3.15:Rehabilitation: Environmental incidents register (to be updated in Greenside Colliery's EMS). Complaints register (to be updated in Greenside Colliery's EMS).Close-out on incidents received. Monthly monitoring reports. Personal protective equipment register. Induction training and register.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12. SITES OF ARCHAEOLOGICAL AND CULTURAL SIGNIFICANCE			
12.1	If an artefact or site of archaeological importance is uncovered on-site, work in the vicinity must be stopped immediately.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.2	Greenside Colliery must take reasonable precautions to prevent any person from removing or damaging any such article and must immediately, upon discovery thereof, inform the ECO of the discovery.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.3	The South African Heritage Resources Association (SAHRA) is to be contacted who will appoint an archaeological consultant.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.4	Work may only resume once clearance is given in writing by an archaeological consultant.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.5	If a grave is uncovered on site, or discovered before the commencement of work, then all work in the immediate vicinity of the graves must be stopped and the ECO informed of the discovery.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.6	The SAHRA should be contacted and in the case of graves, arrangements made for an undertaker to carry out exhumation and reburial.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.7	Environmental incidents register (to be updated in Greenside Colliery's EMS); and	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
12.8	Certification to continue construction should an article, grave or midden be unearthed.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
13. WASTE MANAGEMENT			
13.1	The project site should be kept in an orderly state at all times. Littering is prohibited.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
13.2	Suitably covered receptacles must be available at all times and conveniently placed for the disposal of waste. These receptacles will be removed to the central salvage yard before being removed from site and disposed of by a permitted contractor at a licensed site. While being stored on-site, the receptacles should be placed within designated areas on an impermeable surface and must be correctly labelled and/or adequately colour coded.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
13.3	Under no circumstances is waste to be burnt or buried on-site.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
13.4	Records of hazardous waste being taken off-site must be kept as evidence.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
13.5	All leakages, spillages and incidents must be cleaned-up and reported.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14. SPILLAGES AND INCIDENTS			
14.1	The pollution control dam must be designed according to the design plans. The dam should be lined with a plastic lining of 2mm in thickness and should include a “Jacuzzi line” to be used during emergency conditions.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.2	Subsoil drainage to be incorporated under the liner to detect potential leakages and spillages. This will act as a barrier for groundwater that may permeate the water table	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.3	The existing clean and dirty water separation system must be extended to include the proposed project to ensure that no contamination of clean water systems occurs. The clean and dirty water separation system should comply with government notice regulation 704.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.4	A storm water management plan should be updated to include the pollution control dam to ensure no contaminated storm water enters the environment.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.5	Should the dam fail, or a major leakage or spillage occur, the dirty water should be directed into a dirty water channel and directed to another pollution control dam on-site. The relevant authorities should be notified of the spillage (Department of Water Affairs, Mpumalanga Department of Economic Development, Environment and Tourism) and associated rectification activities undertaken to contain the spillage.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.6	Regular inspections of the pollution control dam and associated infrastructure must be undertaken.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.7	MSDS for on-site hydrocarbon, chemical and hazardous substances must be readily available.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.8	MSDSs should include information pertaining to environmental impacts and measures to minimise and mitigate against any potential environmental impact which may result from a spill or leakage.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.9	Ensure that areas containing chemical and hazardous substances are contained (e.g. in a bund) to ensure no contamination of surrounding water resources or soil is contaminated.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.10	The bunded area must be able to contain 110% of the total volume of materials stored at any given time.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.11	Small quantities (50 litres or less) of chemical and hazardous substances (oil, lubricant, etc) shall be stored in appropriate containers within a secure storage area.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.12	The base of the storage area should be impervious and designed to ensure that the contained substances do not infiltrate into the soil.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.13	If a spillage of a hydrocarbon, chemical or hazardous substance occurs, the resultant substance must be cleaned up as soon as practically possible using absorbent material provided in spill kits on-site and disposed of as hazardous waste.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.14	An incidents report must be completed should a spillage or leakage of a chemical, hydrocarbon or hazardous substance occur. Furthermore, an emergency preparedness and response procedure must be updated to include the project site and provided should an incident or the spillage of a chemical, hydrocarbon or hazardous substance take place.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.15	All incidents must be reported to the responsible ECO as soon as it occurs.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.16	Regular inspections of the Retreatment Plant and associated infrastructure must be undertaken.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
14.17	Concrete mixing must be confined to as few areas as possible and ad hoc mixing is to be avoided. Furthermore, concrete mixing is to be undertaken on an impervious surface and any run-off contained.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
14.18	Should an incident occur the ECO must: Implement reasonable measures to contain a minimise the impacts of the incident; Notify all persons whose health may be affected by the incident; Notify the contractor who will advise on the measures that should be implemented; Undertake clean-up procedures immediately; Record the incident in the Environmental Incident Register; and Implement preventative actions in order to prevent similar incidents from occurring in the future. Environmental incidents register (to be updated in Greenside Colliery's EMS).Complaints register (to be updated in Greenside Colliery's EMS).Close-out on incidents received. Monthly monitoring reports. Emergency Preparedness and Response Plan.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15. SOCIO-ECONOMIC IMPACTS			
15.1	All affected landowners, tenants, institutions, businesses and industries to be notified of the proposed Retreatment Plant prior to commencement.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.2	Issues and concerns raised by affected parties are to be recorded and resolved in a mutually agreeable manner in order to ensure social responsibility.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.3	As far as possible, local labourers will be appointed for skilled and semi-skilled positions.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.4	Principles of equality, Black Economic Empowerment (BEE), gender equality and non-discrimination must be implemented.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.5	Ensure all employees are supplied with the correct personal protective equipment.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.6	Employees must be trained in health and safety policies, environmental awareness, emergency preparedness, and HIV and AIDS.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.7	In-service training, where applicable, must be provided to employees.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.8	Ensure compliance to the Mine Health and Safety Act (No. 29 of 1996) requirements.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
15.9	A complaints register must be made available the site security office and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
16. MONITORING, REPORTING AND RECORD KEEPING			
16.1	Environmental monitoring will be undertaken by the ECO on a monthly basis (or as agreed to by Greenside Colliery) during the construction and operation phases.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
16.2	*This monitoring will be undertaken in order to ensure compliance with all aspects or requirements of the EMP.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
16.3	The ECO is to inspect and monitor the operation and to implement the necessary actions to ensure compliance with the EMP.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
16.4	The ECO should report and discuss any difficulties with the implementation of the EMP with Greenside Colliery and the relevant government authority.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
17. COMPLAINTS REGISTER AND ENVIRONMENTAL INCIDENT REGISTER			
17.1	Complaints received from the community, stakeholders or other affected parties, must be registered and recorded by the ECO and also brought to the attention of Greenside Colliery. Both parties will respond accordingly. The following information must be recorded in the case of any complaint/incident: Time, date and nature of complaint;	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	Response and investigation undertaken; and Corrective and preventative actions taken and by whom.		
17.2	All complaints should be closed-out within 14 days of the complaint received.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
17.3	All environmental incidents occurring on the site will need to be recorded in an environmental incident register. The following information must be provided: Time, date and nature of complaint; Response and investigation undertaken; and Corrective and preventative actions taken and by whom.	N/A	Construction activities for the Discard Dump expansion are completed and the Discard Dump is operational. The retreatment plant has not yet been constructed.
D. EXTENSION OF THE EAST BLOCK UNDERGROUND MINING AREA			
1. GEOLOGY			
1	Removal of material should be limited to only coal and material that must be removed to access the coal.	C	Greenside Colliery reported that only coal and carbonaceous material are removed from the underground mining operation
2. TOPOGRAPHY, SOILS, LAND USE AND LAND CAPABILITY			
2a. Topography, Soils and Land Use Capability			
1	High extraction underground mining methods will not be utilised, therefore, there is lower chance of surface subsidence occurring.	C	Greenside Colliery reported that high extraction underground mining methods are not utilised. Greenside Colliery extract coal using the bord and pillar mining method.
2	Prevent surface subsidence by making use of a sufficient pillar safety factor during bord-and-pillar mining.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
3	Subsided areas should be rehabilitated as soon as possible after subsidence, and it should be ensured that such areas are free draining.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. In addition, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
2b. Surface Infrastructure (Ventilation Shaft, Downcast Shaft, Powerline)			
1	The disturbance area for the construction will be kept at a minimum and in the designated areas as per the approved layout plans.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	Topsoil and subsoil will be stripped from the proposed footprint areas before construction starts. Topsoil stockpiles should not have steep slopes that encourage the possibility of erosion.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	All topsoil stockpiles should also be protected by berms to prevent erosion of stockpiled material and to divert surface water runoff around the material.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4	Topsoil stockpiles should not have steep slopes that encourage the possibility of erosion.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
5	Ensure topsoil stockpiles do not exceed a height of 1.5 metres.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
6	Should these stockpiles become a source of windblown dust, they must be covered by plastic sheeting or vegetated with indigenous vegetation.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7	All alien invasive flora should be removed from the stockpiles	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3. FAUNA AND FLORA			
3a. Underground mining (bord-and pillar) and undermining of wetland.			
1	Ensure that sufficient pillars remain in the underground mine that the upper soil strata do not subside.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
2	Areas above underground mining zones should be regularly monitored to ensure that subsidence is not taking place.	C	Greenside Colliery reported that monthly flyovers are conducted to identify any areas that have subsided. No areas of subsidence were observed during the site inspection.
3	Any subsidence recorded must be rehabilitated. This should include sealing of cracks in the surface and sub-surface, as well as the landscaping and revegetation of the affected areas to prevent surface accumulation and subsequent ingress of water.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. In addition, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
4	A grass mix should be selected for rehabilitation of disturbed open areas. The selected grass mix should consist of a mix of quick covering grassed pioneer species mat-forming grasses (e.g. Gynodon dactylon, Chloris gayana) and tufted grasses (e.g. Eragrostis curvula) to ensure prompt and adequate coverage of the exposed soil whilst also achieving long-term stability. Alternatively, the current seed mix may be used as per Greenside Colliery's Original Environmental Management Programme Report.	C	Greenside Colliery's Vegetation Monitoring Procedure provides guidelines for the seed mixture to be used in re-vegetation during rehabilitation of disturbed areas. The seed mixture comprises a mix of Eragrostis sp., Cynodon dactyl, Chloris Gayana, Kikuyu sp. and Paspalum notatum
3b. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Keep infrastructure out of wetland vegetation (as assessed in the Wetland Specialist Report, compiled by Wetland Consulting Services, 2018) areas to minimise impact to flora and fauna as these areas are important habitat types.	C	Greenside Colliery reported that all activities were undertaken in accordance with the EA, EMPr, WUL and approve Layout Plan. During the site inspection, all activities were observed to be limited to the approved footprint and no clearance of wetland vegetation was noted.
4. SURFACE WATER			
4a. Underground mining (bord-and pillar)			
1	Effectiveness of existing monitoring borehole positions should be evaluated.	C	Greenside Colliery evaluates the effectiveness of existing borehole monitoring network during the Annual Water Quality Assessment.
2	Continuation of the monitoring programme to establish post decommissioning trends.	T/N	Greenside Colliery's monitoring programme will continue post decommissioning
3	Wetland water levels near the planned ventilation shaft should be monitored on a regular basis throughout decommissioning and post closure phases.	T/N	Greenside Colliery's monitoring of wetland water levels will continue post decommissioning and closure.
4	Routinely refine, update and validate the conceptual and numerical models developed in this study by incorporation of ongoing monitoring data.	C	Greenside Colliery "Groundwater Model Update" (dated 2021), was availed during the audit. The Groundwater model provides comprehensive conceptual and numerical data for the surface and groundwater monitoring in and around Greenside Colliery.
5	Affected water that does not meet regulatory requirements should not be discharged or be allowed to seep into the natural surface water environment.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
6	Contain all affected water and transfer to EWRP for treatment.	C	Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing.
4b. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Construction activities should be limited to designated areas only, and not take place outside the areas specified in the designs.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2	The laydown area must be kept as small as reasonably possible.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	Soil stockpiles must be placed in designated areas.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4c. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Construct an upstream clean water diversion berm at the proposed vent shaft and a temporary clean water diversion berm at the downcast shaft. This will ensure that clean water is diverted to the downstream environment.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4d. Surface infrastructure (ventilation shaft, downcast shaft, powerline).			
1	Treat all hydrocarbon spills as hazardous waste and dispose of accordingly.	C	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. Contaminated waste from chemical spillages is stored in hazardous waste receptacles and removed by HAZCO Green Solutions CC for disposal at Holfontein Landfill site.
2	All vehicle and equipment usage should be limited to designated areas only.	C	Greenside Colliery reported that the servicing of vehicles and equipment is restricted to the site workshops. During the site inspection, no servicing of vehicles/ equipment was observed outside of the designated workshop areas.
3	Store fuel and oil in designated bunded areas.	C	During the site inspection, fuel and oil was observed in designated bunded areas.
4e. Surface infrastructure (ventilation shaft, downcast shaft, powerline).			
1	Maintain the clean water diversion berm constructed during the construction phase.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	Conduct regular maintenance on the diversion berm to ensure optimal functioning.	C	Monthly inspections conducted by the Environmental Department include checking of clean and dirty stormwater infrastructure. Any incidents identified during the inspection will be logged on Enablon and the responsible Engineer will be notified for the necessary repair works.
5. GROUNDWATER QUANTITY			
5a. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast shaft, powerline).			
1	The dewatering of the aquifer system cannot be prevented.	T/N	The condition is noted and accepted by Greenside Colliery.
2	Surface water should not be allowed to enter the shaft areas.	C	The Storm Water Management Plan for Greenside Colliery (September 2024) was availed during the audit. Surface water is diverted away from shaft areas by channels and berms.
3	Divert surface flow away from the shaft areas.	C	The Storm Water Management Plan for Greenside Colliery (September 2024) was availed during the audit. Surface water is diverted away from shaft areas by channels and berms.
4	Monitor wetland/s in vicinity of shafts.	C	Monthly inspections are conducted by the Environmental Department.
5	The surface concrete works which will hold the drilling rig, and subsequently house the canopy of the ventilation shaft should be appropriately engineered and sealed to prevent the ingress of rainwater into the ventilation shaft while in operation.	N/A	The condition falls outside of the scope of the audit period (August 2023 - August 2024). No construction activities were undertaken during the audit period.
5b. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast)			
1	The localised dewatering of the deep aquifer cannot be prevented.	T/N	The condition is noted and accepted by Greenside Colliery.
2	Monthly inspections of the surface concrete work should be undertaken during the operational phase to ensure any ingress of rainwater into the ventilation shaft is prevented.	C	Monthly inspections are conducted by Greenside Colliery Environmental Department.
3	Groundwater levels near the planned mine should be monitored on a regular basis throughout construction, operation and post closure phases.	C	Groundwater levels are monitored monthly and the results are provided in the "Flow Meter Data - June 2024" as well as the quarterly ground and surface water reports.
4	If impact is confirmed by monitoring, impacts to the community's and farmers' water supply must be mitigated by the client providing an alternative reliable, clean water supply.	C	Greenside Colliery reported that no impacts to the community's and farmers' water supply were reported for the audit period (August 2023 - August 2024)
5	Routinely refine, update and validate the conceptual and numerical models developed in this study by incorporation of ongoing monitoring data.	C	The Groundwater Model Update (dated 2021) was availed during the audit. The model is updated after every two years.
5c. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast)			
1	Prevention of subsidence.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided. Through review of the reports, no subsidence was reported.
6a. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	During the construction phase appropriate temporary stormwater infrastructure will be developed and implemented, in accordance to Regulation 704.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	Prevent or contain contamination from spilling and oil leaks from vehicles, equipment and drill rigs.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	Construction activity management should ensure that any materials handling does not pose a material risk to soil, surface water and groundwater pollution.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4	Although water quality impacts are not foreseen, it is nevertheless recommended to monitor water of the receiving surface and groundwater environment.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
5	The monitoring programme should serve as an early warning detection system.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
6	Continue current monitoring programme on current frequency.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
6b. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Minimize seepage, prevent contact between clean and dirty areas, and to recycle contaminated water.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
2	Groundwater abstracted from underground should be stored in an affected water circuit and not be discharged or allowed to seep into the receiving environment.	C	Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
3	Monitor water of the receiving surface and groundwater environment.	C	Groundwater monitoring is conducted quarterly and surface water monitoring is conducted monthly in accordance with the requirements of the WUL. The Quarterly Water Monitoring Reports was availed during the audit period.
4	Continue with abstraction strategy and transfer to the EWRP.	C	Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing.
5	The monitoring programme should serve as an early warning detection system.	C	According to the annual and quarterly water reports, groundwater monitoring serves as an early warning detection system.
6	If quality impacts do occur it should be mitigated or remediated or the end user compensated for the loss in resource.	C	Non-compliances of ground and surface water quality with Greenside Colliery's WULs are logged onto, and managed through the ENABLON System in accordance with the "Incident Management Procedure". The ENABLON System includes corrective and preventative actions, responsible persons and target dates.
7	Implement emergency procedures such as containment pumping to retain plume if necessary.	C	Greenside Colliery implements various procedures to prevent groundwater contamination and monitor groundwater quality. This includes the pumping of water found underground to the EWRP for treatment, conducting quarterly groundwater monitoring and updating the groundwater model to provide the most accurate invoice of the plume location and monitoring.
6c. Underground mining (bord-and pillar) and Surface infrastructure (ventilation shaft, downcast shaft, powerline)			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1	Minimize seepage, prevent contact between clean and dirty areas, and to recycle contaminated water.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
2	Monitor water levels of deep aquifer so that emergency decant procedures can be put in place. This could include pumping to keep water levels below decant level.	C	Groundwater levels are monitored monthly and the results are provided in the "Flow Meter Data - June 2024" as well as the quarterly ground and surface water reports. No decant was recorded for the audit period (August 2023 - August 2024)
3	Maintain water levels below decant level by through pumping.	C	Groundwater levels are monitored monthly and the results are provided in the "Flow Meter Data - June 2024" as well as the quarterly ground and surface water reports. No decant was recorded for the audit period (August 2023 - August 2024)
7. SENSITIVE LANDSCAPES (INCLUDING WETLANDS)			
7a. Underground mining (bord-and pillar)			
1	The mine plan should be adjusted to exclude Berry's Pan, unless it can be shown with high confidence that no impact to the pan will results either during operation or in the long-term after mine closure.	T/N	Greenside Colliery's Rock Engineering Department reported that a survey was conducted which confirmed that no mining activities occurred at Berry's Pan.
2	Surface subsidence under wetlands and in close proximity to wetlands must be avoided and a suitable pillar safety factor should be implemented to ensure this.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
3	As a minimum, it is recommended that no subsidence be allowed to take place within delineated wetland areas. Stability of the overlying strata must be ensured in the long-term, i.e. permanently.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
4	A groundwater monitoring strategy as per the recommendations of the groundwater specialist report must be implemented to monitor groundwater levels in the surrounding area. This should include monitoring of the shallow weathered aquifer water levels and water quality.	C	Groundwater quality monitoring is conducted quarterly and groundwater level monitoring is conducted monthly in accordance with the requirements of the WUL. The Quarterly Water Monitoring Reports was availed during the audit period.
5	Where the groundwater specialist report indicates a likely loss of groundwater inputs to adjacent wetlands, the relative significance of this loss should be determined and quantified to allow for the evaluation and possible implementation of alternative mitigation measures such as discharge of clean water into the affected wetlands (likely only feasible in valley bottom wetlands) to offset flow losses from groundwater drawdown.	C	Greenside Colliery reported that no loss of groundwater inputs to adjacent wetlands were recorded for the audit period (August 2023 - August 2024).
7b. Underground mining (bord-and pillar)			
1	The mine plan should be adjusted to exclude Berry's Pan, unless it can be shown with high confidence that no impact to the pan will results either during operation or in the long-term after mine closure.	T/N	Greenside Colliery's Rock Engineering Department reported that a survey was conducted which confirmed that no mining activities occurred at Berry's Pan.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2	Surface subsidence under wetlands and in close proximity to wetlands must be avoided and a suitable mining method and pillar safety factor/extraction ratio should be implemented to ensure this. As a minimum, it is recommended that no subsidence be allowed to take place within delineated wetland areas. Stability of the overlying strata must be ensured in the long-term, i.e. permanently.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
3	A groundwater monitoring strategy as per the recommendations of the groundwater specialist report must be implemented to monitor groundwater levels in the surrounding area. This should include monitoring of the shallow weathered aquifer water levels and water quality.	C	Groundwater level monitoring is conducted monthly in accordance with the requirements of the WUL. The Quarterly Water Monitoring Reports was availed during the audit period.
4	Subsidence monitoring must be undertaken and any subsidence recorded must immediately be rehabilitated. This should include sealing of cracks in the surface and sub-surface, as well as the landscaping and revegetation of the affected areas to prevent surface accumulation and subsequent ingress of water.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided.
7c. Underground mining (bord-and pillar)			
1	The mine plan should be adjusted to exclude Berry's Pan, unless it can be shown with high confidence that no impact to the pan will results either during operation or in the long-term after mine closure.	T/N	Greenside Colliery's Rock Engineering Department reported that a survey was conducted which confirmed that no mining activities occurred at Berry's Pan.
2	Surface subsidence under wetlands and in close proximity to wetlands must be avoided and a suitable mining method and pillar safety factor/extraction ratio should be implemented to ensure this.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
3	As a minimum, it is recommended that no subsidence be allowed to take place within delineated wetland areas. Stability of the overlying strata must be ensured in the long-term, i.e. permanently.	C	The Rock Engineering Letter (dated 18th February 2020) indicated that Bord-and-pillar mining is practiced at Greenside Colliery, which is an intrinsically safe method in terms of minimising the effects to the stability of the overburden rock mass and subsequently the surface. The pillar systems are designed to meet the Safety Factor and Probability of Stability of the pillar system. Furthermore, reconciliation of the designs is undertaken on a monthly basis in order to check the actual achieved pillar geometries and the Safety Factors and Probabilities of Stability are reconciled with the original designs.
4	A groundwater monitoring strategy as per the recommendations of the groundwater specialist report must be implemented to monitor groundwater levels in the surrounding area. This should include monitoring of the shallow weathered aquifer water levels and water quality.	C	Groundwater level monitoring is conducted monthly in accordance with the requirements of the WUL. The Quarterly Water Monitoring Reports was availed during the audit period.
5	Subsidence monitoring must be undertaken and any subsidence recorded must immediately be rehabilitated. This should include sealing of cracks in the surface and sub-surface, as well as the landscaping and revegetation of the affected areas to prevent surface accumulation and subsequent ingress of water.	C	Greenside Colliery Surface Subsidence Identification and Rehabilitation Procedure indicates that areas which have been affected by surface subsidence are immediately rehabilitated and the area is made free draining. Furthermore, stability analysis over the underground workings is undertaken to identify areas of high subsidence potential on monthly basis and monthly flyovers are conducted to identify any areas that have subsided.
7d. Underground mining (bord-and pillar)			
1	The likelihood of decant, as well as its location and expected quality should be accurately determined at a high level of confidence and measures put in place to ensure that no decant or discharge of contaminated water occurs, unless it meets the	T/N	Greenside Colliery "Groundwater Model Update" (dated 2021), was availed during the audit. The Groundwater model identifies future decant at Clydesdale. No decant occurred for the audit period (August 2023 - August 2024).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	applicable resource quality objectives (RQO's). Where the RQO's are exceeded, contaminated water will need to be treated. A water management strategy must therefore be developed and implemented on that site that will ensure that water levels within the mined out areas are actively managed post-mining so that decant is prevented and no contaminated water is discharged into the environment untreated.		
2	The decant point should ideally be located at least 200m from the edge of the nearest wetland/watercourse.	T/N	Greenside Colliery "Groundwater Model Update" (dated 2021), was availed during the audit. The Groundwater model identifies future decant at Clydesdale. No decant occurred for the audit period (August 2023 - August 2024).
3	Opportunities for the passive treatment of mine water post closure should also be investigated to reduce maintenance costs and responsibilities of water treatment post closure.	T/N	The condition is noted and accepted by Greenside Colliery.
4	Mine design should consider the expected decant point and, where possible, should target to have the decant point located outside any wetland or watercourse habitat, with sufficient space between the expected decant point and adjacent wetlands or watercourses to allow for suitable management interventions, including potentially the passive treatment of decant.	T/N	Greenside Colliery "Groundwater Model Update" (dated 2021), was availed during the audit. The Groundwater model identifies future decant at Clydesdale. No decant occurred for the audit period (August 2023 - August 2024).
7e. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	The location of the ventilation shaft has been adjusted to fall outside the delineated wetland area.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	The extent of disturbance should be limited by limiting all construction activities to the direct development footprints as far as practically possible.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	The construction sites should be fenced off using a 5 strand cattle fence or other suitable fence prior to the commencement of vegetation clearing or earthmoving activities. All construction activity must be restricted to the fenced off servitude.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4	No materials should be stockpiled within the wetland areas adjacent to the construction sites and driving within the wetland areas should be kept to an absolute minimum. Clearly defined access routes should be used.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
5	Post construction all alien invasive vegetation should be removed from site. This will also require long-term follow up to ensure establishment of natural vegetation in all disturbed areas.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
6	All construction activity must be restricted to the fenced off servitude.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7	Ideally construction activities within wetlands should take place in winter (during the dry season).	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7f. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Minimise the construction footprint. Clearly demarcate the required construction servitude and maintain all activities within the demarcated area.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	Install erosion prevention measures prior to the onset of construction activities. Measures should include sediment barriers along the lower edge of bare soil areas, placement of hay bales/sediment barriers around the within wetland construction areas and re-vegetation of disturbed areas as soon as possible.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	Placement of powerline poles/pylons within wetland areas should be minimised, but clear spanning wetland areas is unlikely to be possible. Vegetation clearing activities should be limited as small an area as possible with a single access track along the powerline route. Use existing tracks as far as possible.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4	Detailed method statements must be developed for any road crossings over wetlands. Crossing structures must be designed to ensure flow connectivity across the wetland is maintained and that no impoundment or concentration of flow occurs that could lead to	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	habitat degradation. Where hillslope seepage wetlands are crossed perpendicular to the direction of flow (i.e. parallel to the contour), provision will need to be made to allow flows to pass through underneath the road. Key here would be to prevent the concentration of flows as this would lead to erosion at the discharge point on the downslope side, as well as partial desiccation of the wetland area. Consideration should be given to installing subsurface drains under the road.		
5	Locate all stockpiles, laydown areas and temporary construction infrastructure at least 50m from the edge of delineated wetlands.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7g. Surface infrastructure (ventilation shaft, downcast shaft, powerline)			
1	Install erosion prevention measures and sediment barriers prior to the commencement of construction activities.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	Minimise the construction footprint within the wetland area. Clearly demarcate the required construction servitude and maintain all activities within the demarcated area	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	Make use of existing roads and tracks as far as possible	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
4	Limit cleared areas to as small an area as possible at any one time	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
5	Re-vegetate and rehabilitate areas as soon as possible after completion of construction.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
6	Locate all stockpiles, laydown areas and temporary construction infrastructure at least 50m from the edge of delineated wetlands.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7h. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Construction			
1	Ensure that no equipment is washed in the wetlands of the area, and if washing facilities are provided, that these are placed no closer than 50m from a wetland or water course. No abstraction of water from the wetlands or pans should be allowed unless expressly authorised in the IWULA.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
2	In order to reduce the potential impacts associated with the introduction of contaminants dissolved or suspended in the runoff from construction sites, where practically possible, no runoff should be introduced into wetlands directly. Introduction into dryland areas is preferred as the vegetation and soils provide an opportunity to limit the movement of contaminants and the environment is conducive for natural degradation.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	Potential contaminants used and stored on site should be stored and prepared on bunded surfaces to contain spills and leaks. Sufficient spill clean-up material must be kept on site at all times to deal with minor spills.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7i. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Construction			
1	If practically possible in terms of mine design, the location of the ventilation shaft should be adjusted to fall outside the delineated wetland area within previously disturbed areas	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
7j. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Construction			
1	An alien vegetation management plan should be compiled by an ecologist during the construction/operational phase of the mine and should be kept in place for several years following mine closure (minimum of five years). All species of alien invasive vegetation should be controlled and removed from site. No spread of alien vegetation into any wetlands or adjacent properties should be allowed.	NC 006	During the site inspection the spread of AIPs was observed at the Shaft Erickson Dam, the Oil fill-up area, the Village and Golf course Area, the Green Side East Exploration Boreholes and at the Ventilation Shaft. Greenside Colliery reported that an AIP has been developed and that a service provider is currently being sourced for the removal of AIPs.
2	No contaminated water may be discharged into the environment unless treated to the required standards.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
7k. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Operational			
1	No contaminated water may be discharged into the environment unless treated to the required standards.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
2	Clean and dirty water areas should be clearly defined for all surface infrastructure areas.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications.
3	Dirty water areas must be isolated from the surrounding clean water areas and all dirty water contained in appropriate lined facilities.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications.
4	Dirty water should be re-used by the mine or treated to the required standards prior to discharge into the environment.	C	Greenside Colliery reported that the dirty water system was constructed and operated in accordance with the designs approved as part of the EA and WUL applications. Dirty water from the underground workings is pumped to the EWRP and the new PCD. Treated water from the EWRP is in turn supplied to Greenside Colliery for use as drinking water at No.4 seam underground workings and also pumped to the Erickson dams, from where it is used at the coal beneficiation plant for coal washing. Water from the new PCD is pumped to the Erickson Dam 1 and 2 for re-use at the coal beneficiation plant.
5	Any discharge points must be appropriately designed to prevent erosion within the receiving environment.	C	During the site inspection, no concerns regarding erosion at discharge points were observed.
7L. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Operational			
1	Routine surveys of the powerline should make use of existing tracks or be undertaken on foot.	C	The Environmental Department conducts monthly inspections which includes the powerline routes. Greenside Colliery reported that existing access routes are used during site inspections and maintenance.
2	Should machinery or vehicles be required to access powerline poles/pylons away from existing tracks, a single access track should be utilised.	T/N	Greenside Colliery reported that no new access routes were created or required to access the powerline infrastructure during the audit period (August 2023 - August 2024).
3	Any disturbance caused by maintenance activities must be immediately rehabilitated.	T/N	Greenside Colliery reported that no disturbance caused by maintenance activities were reported during the audit period (August 2023 - August 2024).
7m. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Operational			
1	Limit disturbance to wetland habitat by limiting decommissioning activities to the actual disturbance footprint. No activities should take place outside the fenced off areas. No access to wetland areas should be allowed unless infrastructure to be decommissioned is located within a wetland area. Only make use of existing roads and tracks to access the site during decommissioning phase. Implement an alien vegetation management plan to prevent establishment and spread of alien species.	T/N	The condition falls outside the scope of the audit period (August 2023 - August 2024). The mine is operational and decommissioning activities have not yet commenced.
7n. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Decommissioning and Closure			
1	All disturbed areas should be landscape to approximate the natural landscape profile but should avoid steep slopes and concentrated run-off. Compacted soils should be ripped and scarified. The rehabilitated areas should be re-vegetated as soon as possible following completion of the earthworks to minimise erosion. Regular long-term follow up of rehabilitated areas will be required to ensure the successful establishment of vegetation and to survey for any erosion damage on site. Erosion damage should be repaired immediately. The recommendations contained within the specialist vegetation and soils reports should be fully implemented to ensure successful rehabilitation.	T/N	The condition falls outside the scope of the audit period (August 2023 - August 2024). The mine is operational and decommissioning activities have not yet commenced.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8. AIR QUALITY			
8a. Surface infrastructure (ventilation shaft, downcast shaft, powerline) - Construction, Operation and Decommissioning and Closure			
1	The following mitigation measures will be implemented:		
2	Phasing of earthmoving activities to reduce source size.	T/N	The condition falls outside the scope of the audit period (August 2023 - August 2024). No construction activities occurred for the audit period.
3	Dust suppression in dirty areas in accordance to the dust suppression procedure EP22.	C	Dust is managed by using water tankers trucks to wet access roads or dust generating areas and the water bowser was observed during the site inspection. Greenside colliery conducts dust fallout monitoring at nine monitoring sites (Hostel, Pine Avenue and East Village, Pos 1 (Along R547), Pos 2 (T Roux's Farm), Pos 3 (South of Dump), Pos 4 (Shared Services), Pos 5 (Opposite Highveld Hospital) and Pos 6 (Along R555), for residential and non-residential areas. The most recent Air Quality Monitoring Results (2023), show that there were exceedances were recorded against residential or non-residential limits for the audit period (August 2023 - August 2024).
4	Early vegetation and stabilization of topsoil stockpile and reduction of the frequency of disturbance.	T/N	No new stockpiles were generated during the audit period (August 2023 - August 2024).
5	Early paving or treatment with chemical surfactant of mine-owned permanent roads.	N/A	Greenside Colliery reported that paving of roads is not undertaken on its access roads.
6	Speed control will be enforced on all roads.	C	A speed limit of 20k/h is enforced at the mine to control speed.
7	Complaints register must be made available for the recording of complaints relating to dust see environmental procedure –“EP 09: Environmental Incidents, Non-conformance and Complaints”.	C	The complaints register is available at the security entrance of the mine. The complaints register was availed during the audit and no complaints were received for the audit period (August 2023 - August 2024)
8	Dust fall out monitoring plan must be developed and effectively implemented.	C	Greenside colliery conducts dust fallout monitoring at nine monitoring sites (Hostel, Pine Avenue and East Village, Pos 1 (Along R547), Pos 2 (T Roux's Farm), Pos 3 (South of Dump), Pos 4 (Shared Services), Pos 5 (Opposite Highveld Hospital) and Pos 6 (Along R555), for residential and non-residential areas. The most recent Air Quality Monitoring Results (2023), show that there were exceedances were recorded against residential or non-residential limits for the audit period (August 2023 - August 2024)
9	Consideration should be given to ambient monitoring (PM10 and PM2.5).	C	Greenside colliery conducts dust fallout monitoring at nine monitoring sites, which includes monitoring of PM10 and PM2.5. The most recent Air Quality Monitoring Results (2023), show that there were exceedances were recorded against residential or non-residential limits for the audit period (August 2023 - August 2024)
10	Greenhouse gas emissions must be managed through effective maintenance of all diesel driven vehicles.	C	Greenhouse gas emissions are managed by conducting weekly maintenance of diesel driven vehicles. Proof of weekly maintenance inspection was provided for review during the audit period.
9. NOISE			
1	Ensure all equipment and vehicles are serviced regularly to prevent excessive noise. Vehicles and equipment generating excessive noise should be fitted with appropriate noise abatement measures.	C	Greenside Colliery reported that maintenance inspections of equipment and vehicles are conducted on weekly basis to prevent excessive noise that could emanate from the equipment and vehicles. Greenside Colliery additionally reported that machinery and vehicles are fitted with exhaust systems and maintained in a good state of repair.
2	Construction workers must be provided with the appropriate personal protection equipment in areas required as per the Mine Health and Safety Act (No. 29 of 1996) (MHSA). Records of the PPE supplied must be maintained for record keeping purposes.	N/A	No construction activities were undertaken during the audit period (August 2023 - August 2024)
3	A complaints register must be made available the site security office and should any complaints be received, these must be logged in the complaints register and reported to the responsible person on-site. All complaints must be closed out within 14 days.	C	The complaints register is available at the security entrance of the mine. The complaints register was availed during the audit and no complaints were received for the audit period (August 2023 - August 2024)
4	Training and induction requirements must be undertaken.	C	The "Greenside Colliery Induction 2024" and the attendance register for induction conducted during the audit period (August 2023 - August 2024) were availed to the auditors.
5	Environmental incidents register (to be updated in Greenside Colliery's EMS), with records of close-out on incidents received.	C	Greenside Colliery uses Enablon system for the recording and management of environmental incidents and includes the time, date, nature of the incident, response and investigation undertaken, corrective and preventative actions, responsible persons and target dates. The

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			management of incidents is undertaken in accordance with the Greenside Environmental Incident and Complaints Procedure.
6	Undertake environmental noise monitoring and keep records of monitoring reports.	C	Noise monitoring is conducted for the East Block Underground Mining Project. Noise monitoring report was provided for review during the audit period.
7	Personal protective equipment register to be kept	C	PPE is supplied to employees and the PPE register indicating the issuance of PPE to employees was availed to the auditor.
8	Induction training and register to be kept	C	The "Greenside Colliery Induction 2024" and the attendance register for induction conducted during the audit period (August 2023 - August 2024) were availed to the auditors.
10. VISUAL			
1	Keep disturbed areas to a minimum.	C	Greenside Colliery reported that all construction activities were undertaken within the approved footprint and within the fenced area. During the site inspection, all activities were observed to be within the authorised footprint.
2	No clearing of land to take place outside the demarcated footprint.	C	Greenside Colliery reported that all construction activities were undertaken within the approved footprint and within the fenced area. During the site inspection, no vegetation clearance was observed.
3	Only indigenous plant species to be introduced and planted. All areas must be vegetated with a suitable ground cover immediately after or construction activities to prevent erosion and mud slides.	C	Greenside Colliery's Vegetation Monitoring Procedure provides guidelines for the indigenous seed mixture to be used in re-vegetation during rehabilitation of disturbed areas. The seed mixture comprises a mix of Eragrostis sp., Cynodon dactyl, Chloris Gayana, Kiku
4	Buildings and similar structures must be in keeping with the principles of critical regionalism, namely sense of place, sense of history, sense of nature, sense of craft and sense of limits.	N/A	No buildings will be constructed at the East Block Underground Mining Project.
5	Implement a rehabilitation plan.	C	Greenside Colliery's Annual Rehabilitation Plan provides adequate guidelines for returning the area to a useful post-mining topography and re-vegetation which will reinstitute surface drainage.
6	Inoperative equipment and poor housekeeping, in general, creates a poor image of the activity in the eyes of the public.	C	Greenside Colliery reported that maintenance inspection of equipment is conducted on a weekly basis.
11. SITES OF ARCHAEOLOGICAL AND CULTURAL IMPORTANCE			
1	If any heritage resources of significance are exposed during AOL's proposed new ventilation shaft construction, the South African Heritage Resources Authority (SAHRA) should be notified immediately, all development activities must 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. This may include obtaining the necessary authorisation (permits) from SAHRA to conduct the mitigation measures.	T/N	No archaeological material have been discovered during the audit period. (August 2023 - August 2024).
11. PALAEONTOLOGY			
1	If any palaeontological material is exposed during digging, excavating, drilling or blasting SAHRA must be notified. All construction activities must be stopped and a palaeontologist should be called in to determine proper mitigation measures.	T/N	No palaeontological material was discovered during the audit period (August 2023 - August 2024).
12. SOCIO-ECONOMIC			
1	Where possible and feasible, local procurement of labour should be applied to ensure the maximum benefit to the impacted community.	C	Th annual Social and Labour Plan (dated 2019-2023) was availed during the audit and indicated that skilled and unskilled labour are sourced locally. Greenside Colliery is committed to uplifting the lives of the people in their host communities, close to their operations and therefore source labour, wherever possible, from their local communities. Skill development opportunities are included on the SLP for implementation purposes
2	Continuous skills and development training will equip low-skilled labourers with experience and advanced skills to work on other mining projects within the area, thus creating long-term employment if the foreseeable future.		

5. SUMMARY OF THE AUDIT FINDINGS

5.1. NON-COMPLIANCES

A total of seven (7) non-compliances were raised in terms compliance with the conditions of the Environmental Authorisations and Environmental Management Programmes, as assessed in Section 4. Table 5 below provides a summary of the non-compliances raised.

5.2. ACTIONS TO ADDRESS THE NON-COMPLIANCES

An Action Plan to address and rectify the non-compliances is included in Table 5.

5.3. RECOMMENDATIONS TO AMMEND CERTAIN CONDITION

In terms of Regulation 34(4) of the EIA Regulations (GN R984 of 2014), no recommendations are made to amend the Environmental Management Programme. Greenside Colliery largely complies with the conditions of its Environmental Authorisation and Environmental Management Programmes. Non-compliances with that were raised during the audit can be addressed through corrective actions which can be affected within a short period if one considers the nature and extent of non-compliances.

TABLE 5. SUMMARY OF NON-COMPLIANCES AND ACTION PLAN

NC NO.	EA/ EMPR REF.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADRESS NON-COMPLIANCE	RESPONSIBLE PERSON/S	TARGET DATE
NC 001	Greenside Colliery EA dated 31/01/2022 MP 30/5/1/2/3/2/1 304 EM - Condition 8.2.1.4 - Condition 8.2.1.14 (a) - Condition 8.2.1.5 Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft</i> - Condition 10.5 - Condition 10.6	Water generated at the Shaft Wash-bay was not draining into the sump system and was ponding within the Wash-bay area.	Assess the issue of ponding against the Storm Water Management Plan and determine what measures need to be implemented to mitigate and prevent this issue from reoccurring, including the potential need to update the Storm Water Management Plan.	T. Montshiane T. Rantete H. Kgaphola	28/02/2025
		Water emanating from pavement washing was ponding at the Plant Fire tanks.	Greenside Colliery reported that the trenches around the area will be unblocked to allow the flow of water.		
		Water generated at the Discard Silo area was flowing over the road and ponding within information gravity to the silt trap.	Project to be implemented to channel water flowing from the Discard Silo into the Silt Trap.	T. Montshiane T. Rantete H. Kgaphola	01/10/2024
NC 002	Greenside Colliery EA dated 31/01/2022 MP 30/5/1/2/3/2/1 304 EM - Condition 8.2.1.5 Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft</i> - Condition 10.6	At the Shaft Erickson Dam, water spills were observed around the facility and ponding, with a white precipitation was visible. Greenside Colliery reported that there was a pipe burst at the Erickson dam, as well as a hole at the joint which require repair.	Erickson Dam Area will be cleaned . Water will be channelled around the dam to prevent ponding. Pipes will be repaired.	T. Montshiane H. Kgaphola	28/02/2025
		At the LHD Workshop, water runoff from the downgradient area was observed to be bypassing the dirty water channels and discharging into an uncontained environment.	Water will be diverted to the dirty water system.	T. Montshiane H. Kgaphola	28/02/2025
		At the Rainbow Tanks and Blue Tanks, various water spills and water ponding was observed.	Rainbow and Blue tank water spills leading to ponding will be investigated as per the water balance and to prevent further water spillages.	T. Montshiane T. Rantete H. Kgaphola	01/10/2024
		At the New PCD and Bottom Dam, the auditors observed that silt was placed on unlined surface.	The silt will be removed to the Discard Dump.	T. Montshiane T. Rantete H. Kgaphola	01/10/2024
NC 003	Greenside Colliery EA dated 31/01/2022 MP 30/5/1/2/3/2/1 304 EM - Condition 8.2.1.11. (a) - Condition 8.2.1.11. (e) Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft</i> - Condition 12.10 - Condition 12.12	During the site inspection, poor general waste management practices were observed. Waste Littering was observed at: - Oil Fill-up Area. - LDV Parking Area. - Shaft Surface Area. - Permanent Contractors Managing Discard Dump. - Engineering Workshops.	Staff and contractors will be provided with refresher trainings on waste sorting and littering. Communicate correct waste management practices to employees during annual site induction and monthly SHE talks and retain the relevant records.	T. Montshiane T. Rantete H. Kgaphola A. Brits Engineers/GES	28/02/2025
		Hazardous waste bins that were observed were not covered and not in a contained at the following areas: - At the Permanent Contractors Managing Discard Dump. - Shaft Wash-bay.			
NC 004	Greenside Colliery EA dated 31/01/2022 MP 30/5/1/2/3/2/1 304 EM - Condition 8.2.1.11. Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft</i> - Condition 12.1 - Condition 12.2 - Condition 12.12				

NC NO.	EA/ EMPR REF.	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADRESS NON-COMPLIANCE	RESPONSIBLE PERSON/S	TARGET DATE
NC 005	Greenside Colliery EA dated 31/01/2022 MP 30/5/1/2/3/2/1 304 EM - Condition 8.2.1.12. (c) - Condition 8.2.1.12.(d) Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft</i> - Condition 6.5 - Condition 8.3 - Condition 10.27 - Condition 13.1	Greenside Colliery's "Environmental Spill Clean-up Procedure" provides adequate guidance on the containment, clean-up, disposal and reporting of chemical spillages. However, during the site inspection, various hydrocarbon spills were observed around the site: - At the Dust a side station's Diesel Bowser. - On the ground areas at the Oil fill-up. - At the parking area of the Permanent Contractors Managing Discard Dump. - At the Engineering Workshops.	Train both employees and contractors on the "Environmental Spill Clean-up Procedure" and implement measures to enforce spill clean-up as they occur. Communicated the "Hydrocarbon Spill Clean-up Procedure" to site mechanics and drivers as pre-start up reminder and retain records. Diesel bowser to be placed in bunded area to contain diesel spillages.	T. Montshiane H. Kgaphola	28/02/2025
NC 006	Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft:</i> - Condition 4.1.1 - Condition 10.44 <i>D. Extension of East Block Underground Mining Area:</i> - Condition 7 (j).1	During the site inspection the spread of AIPS was observed at: - The Shaft Erickson Dam. - The Oil fill-up area. - The Village and Golf course Area. - The Green Side East Exploration Boreholes. - The Ventilation Shaft.	A service provided will be appointed to commence with the removal of AIPs in January 2025.	N. Tshikalange	30/01/2025
NC 007	Greenside Colliery EMPR dated 31/01/2022 MP 30/5/1/2/3/2/1 (304) EM <i>A. Coal Discard Dump Extension, Retreatment Plant (Filter Press), PCD, RLT & Thandeka Shaft:</i> - Condition 10.6	- At the LDV Workshop, the trench along road and walkway was silted. - At the Diesel Filling Area, the sump was blocked.	Cleaning of drains and sumps to ensure free flow of water in the channels.	T. Montshiane T. Rantete H. Kgaphola	01/10/2024
		At the Oil Fill-up area, runoff from the walkway area was not contained and was observed to be channelled through a wall opening into uncontained, open area.	Water will be diverted to the dirty water system.	T. Montshiane H. Kgaphola	28/02/2025

6. CONTINUAL IMPROVEMENT

The previous external environmental Performance Assessment was conducted on 31 August 2023 by NTC Group (Pty) Ltd for the annual period August 2022 – August 2023. Findings from the previous annual Performance Assessment (2022 - 2023) have been adequately addressed and no repeat findings were noted.

7. CONCLUSION

The audit team concludes that Greenside Colliery largely complies with the conditions of the Environmental Authorisation and Environmental Management Programmes that were audited as part of the scope of the external environmental Performance Assessment (August 2023 to August 2024). Environmental management at Greenside Colliery was found to be in a good state and sufficient procedures and records were available to govern the activities that take place at the site.

The measures contained in the EA and EMPRs sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the project activities if adhered to.

As long as non-compliances are addressed, Greenside Colliery will be in a position to comply with the conditions of its EA and EMPRs. It is the opinion of the audit team that corrective actions can be affected and implemented within a short period if one considers the nature and extent of non-conformances. The evaluation of the effectiveness of the implementation of corrective actions should be carried out during follow-up external environmental performance assessment, currently scheduled for 2025.

Greenside Colliery is commended on the proactive approach that is taken toward improving how it manages the environment within and surrounding its activities. The auditors would like to thank Greenside Colliery for the cooperation extended and the open approach to the performance assessment.

8. REFERENCES

- GS Legal Permissions;
- AA BEE Certificates ;
- Anglo American Thermal Coal Certificate;
- Anglo American Thermal Coal Report;
- Certificate of change of name of company;
- Amendment of company information;
- Application Approval;
- Projects Application Summary;
- Acknowledgement letter – Notification of construction: Coal Discard Dump Retreatment Plant on a portion of the farm Groenfontein 331 JS, Emalahleni, Mpumalanga;
- Acknowledgement letter - Notification of Construction: Upgrade of existing intersection on provincial road P 141-1;
- Acknowledgement letter – Notification of construction: Proposed construction of a New Greenside Colliery Discard Dump and associated infrastructure to be located on portion 0, 2, and 3 of the farm Groenfontein 331 JS within Emalahleni Local Municipality, Mpumalanga Province;
- Presentation - DWA Permitting Processes dated 28 January 2012;
- Presentation - Permitting Processes dated December 2012;
- Calculation of the quantum 0 New 3A north dump (planned closure 2027);
- Letter to DMR – Anglo Operations proprietary Limited: Greenside Colliery: New Discard Facility Project: DMR Reference Number: Mp30/5/1/2/2/304 MR;
- Directive In Terms of Section 29 Read together with Section 41(3) of The Mineral and Petroleum Resources Development Act, 2002 (Act 28 Of 2002) Regarding Financial Provision in Respect of your Mining Operation on the Farm Blaauwkrans 326 And Others, Situated in the Magisterial District Of Witbank - DMR Reference Number: Mp30/5/1/2/2/304 MR;
- Closure Costs for Waterpan Underground Workings – Greenside Colliery - DMR REFERENCE NUMBER: MP30/5/1/2/2/304 MR;
- Directive in terms of Section 29 - Financial Provision in Respects of Mining Operation on the Farm Blaauwkrans 326 and Others;
- Financial Provision in Respects of Mining Operation on the Farm Blaauwkrans 326 and Others;
- Financial Provision in Respects of Mining Operation on Portion 0, 2 and 3 of the Farm Groenfontein 331 JS;
- Approval of the Environmental Management Programme Amendment for Anglo American thermal Coal (Greenside Colliery) on farm Blaauwkrans 323 JS and others, situated in the Magisterial District of Emalahleni: Mpumalanga Region;
- Comments from DWAF Mpumalanga, dated 12 June 2001;
- Part 5: Environmental Impact Assessment;
- Part 3: Motivation for the Project;
- Part 2: Description of the Pre-mining environment;
- Greenside Colliery Environmental Management Programme Report, dated 2014;
- Part 6: Environmental Management Programme;
- Rehabilitation Plan: Greenside Colliery and New Clydesdale Colliery;
- Evaluation of the Environmental Management Programme Report for Greenside Colliery;
- Application for a mining authorisation: Various portions on the farms Groenfontein 331 JS, Blaauwkrans 323 JS, Weltevreden 324 JS and Vlaklaagte 330 JS;
- Approved EMPR for Greenside Colliery, dated 01 March 2000;
- Greenside Final EMPR Alignment-July 2014;
- Retreatment plant - GS EMPR Nov 2014;

- Notice of an application for amendment to the Greenside Colliery Environmental Authorisation in terms of Chapter 5 of the NEMA, 1998 (Reference number: MP30/5/1/2/2/304MR EA);
- Consolidated and amended Environmental Impact Assessment Report and Environmental Management Programme Report, dated April 2020;
- Submission letter: Greenside Colliery: EMPr Performance Assessment Report 2017;
- EMPr Performance Assessment Report for period January 2013 to December 2013;
- Environmental Audit Report – Environmental Management Programme (EMPr), dated June 2015;
- Proof of submission – EMPR Performance Assessment Report;
- GS Quantum for Financial Provision;
- Letter and receipt to the eMalahleni DMR on the 2015 immediate closure costs with relevant supporting documents;
- Converted Mining Right (License Number MP 30/5/1/2/2/304 MR), dated 02 August 2012;
- Mining Work Programme (Mining Licence ML 20 / 1999);
- Social and Labour Plan (MP 30/5/1/2/2 (303) MR) for year 2014;
- Wayleave Affected Letter Semane Greenside Colliery, dated 11 January 2016;
- Naauppoort floodlines in proximity to Greenside, dated 17 September 2012;
- Discard Dumps Classification Report Ver 2 dated 02 December 2015;
- Greenside Sewage sludge Classification report;
- WULA application forms;
- Site photos;
- DWS response letter dated 14 June 2017;
- DWS response letter dated 14 Jan 2016;
- Response letter 17 March 2017;
- Response letter 24 June 2016;
- Response letter 28 January 2016;
- Dump Retreat Plant WUL (WUL license No.: 04/B11G/CGI/3730), dated 25 August 2015
- Exemption in terms of Regulation 4 (B) (Exemption number: 16/2/7/B100/C80), dated 19 February 2012;
- NEW PCD WUL (WUL No.: 04/B11G/G/2219), dated 07 February 2014; and
- Greenside IWUL (IWUL No.: 04/B11G/AEGJ/1197), dated 19 July 2011.

APPENDIX A
AUDITOR DECLARATION

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

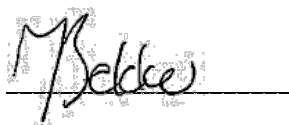
I, TANJA BEKKER, DECLARE THAT –

- I act as an Independent Environmental Practitioner conducting the Environmental Performance Assessment.
- I will perform the work relating to the Performance Assessment 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 Performance Assessments and Environmental Compliance Audits, including knowledge of the National Environmental Management Act (NEMA) (Act 107 of 1998), the Mineral and Petroleum Resources Development Act (MPRDA) (Act 28 of 2002), the Environmental Impact Assessment (EIA) Regulations (GN R982 of 2014), as amended, and legal and other requirements that may have relevance to the proposed activity.
- I will comply with the NEMA (Act 107 of 1998), the MPRDA (Act 28 of 2002), the EIA Regulations (GN R982 of 2014), and all applicable legal and other requirements.
- 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 Performance Assessment, whether such information is favourable to the auditee or not.
- I will perform all other obligations as expected from an Environmental Practitioner in terms of the NEMA (Act 107 of 1998) and EIA Regulations (GN R982 of 2014).
- I realise that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations (GN R982 of 2014), as amended, and is punishable in terms of Section 24F of the NEMA (Act 107 of 1998).

DISCLOSURE OF VESTED INTEREST –

I do not have and will not have any vested interest (either business, financial, personal or other) in any activity other than remuneration for work performed in conducting an Environmental Performance Assessment in terms of the EIA Regulations (GN R982 of 2014), as amended.

SIGNATURE:



COMPANY:

NTC GROUP (PTY) LTD

DATE:

06 DECEMBER 2024

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

I, MARY-ANNE CARTER, DECLARE THAT –

- I act as an Independent Environmental Practitioner conducting the Environmental Performance Assessment.
- I will perform the work relating to the Performance Assessment 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 Performance Assessments and Environmental Compliance Audits, including knowledge of the National Environmental Management Act (NEMA) (Act 107 of 1998), the Mineral and Petroleum Resources Development Act (MPRDA) (Act 28 of 2002), the Environmental Impact Assessment (EIA) Regulations (GN R982 of 2014), as amended, and legal and other requirements that may have relevance to the proposed activity.
- I will comply with the NEMA (Act 107 of 1998), the MPRDA (Act 28 of 2002), the EIA Regulations (GN R982 of 2014), and all applicable legal and other requirements.
- 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 Performance Assessment, whether such information is favourable to the auditee or not.
- I will perform all other obligations as expected from an Environmental Practitioner in terms of the NEMA (Act 107 of 1998) and EIA Regulations (GN R982 of 2014).
- I realise that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations (GN R982 of 2014), as amended, and is punishable in terms of Section 24F of the NEMA (Act 107 of 1998).

DISCLOSURE OF VESTED INTEREST –

I do not have and will not have any vested interest (either business, financial, personal or other) in any activity other than remuneration for work performed in conducting an Environmental Performance Assessment in terms of the EIA Regulations (GN R982 of 2014), as amended.

SIGNATURE:



COMPANY:

NTC GROUP (PTY) LTD

DATE:

06 DECEMBER 2024

APPENDIX B
AUDITOR CURRICULUM VITAE



Tanja Bekker

Company: NTC Group (Pty) Ltd
Environmental Lead Auditor
Mobile: +27 82 412 1799
Email: tanja@ntcgroup.co.za

BRIEF PROFILE

Ms. Tanja Bekker has more than 21 years' working experience in the Environmental Consultancy and Auditing Industry. Her key focus is compliance audits, environmental performance assessments, environmental management, and environmental licensing, with extensive experience in the mining industry. Project Management and Coordination form a critical component of her duties, which include environmental gap analysis, project planning, initiation of projects, client, authority and stakeholder consultation, specialist coordination, budget control, process control, quality control and timeframe management.

PROFESSIONAL QUALIFICATIONS

2002	University of Johannesburg	B.Sc. Earth Sciences
2003	University of Johannesburg	B.Sc. Geography Cum Honours
2004	University of Johannesburg	M.Sc. Environmental Management

CAREER ENHANCING COURSES

- ISO 14000 Lead Auditors Course (WTH Management)
- Certificate in Project Management (Pretoria University)
- Management Advance Programme (MAP 81) (Wits Business School)
- Certificate in Customer Service Excellence (Pretoria University Enterprises)
- IWRM, the NWA and Water Use Authorisations (Carin Bosman Sustainable Solutions)

CAREER ENHANCING COURSES

- Registered Environmental Assessment Practitioner of South Africa (EAPASA)
- Certified ISO 14001 Environmental Management System Auditor
- Registered as a Professional Natural Scientist (SACNASP),
- Member of the South African affiliate of the International Association for Impact Assessment
- Member of the Environmental Law Association of South Africa (ELA).



Mary-Ann Carter

Company: NTC GROUP (Pty) Ltd

Environmental Consultant

Mobile: +27 71 546 0937

Email: mary-ann@ntcgroup.co.za

BRIEF PROFILE:

Mary-Ann is an Environmental Consultant with fourteen years of experience in environmental management and sustainability. She started her career in 2009 as an Environmental Scientist, during which she focused on environmental applications (EIA, BAs Waste Licenses, and Air Emissions Licenses etc.) as well as conducting largescale environmental training. Due to her proficiency in Environmental Auditing, she worked as an Auditor from 2012, conducting various audits throughout the country.

Mary-Ann moved into the industrial sector in 2014, where her role has since been to facilitate onsite environmental management: identifying environmental impacts; implementing management systems and improvement plans; monitoring, analysis and continual improvement; environmental legal compliance; and identification of sustainable solutions and projects.

PROFESSIONAL QUALIFICATIONS:

2018	University of Johannesburg	Master of Science in Environmental management
2012	Nelson Mandela Metropolitan University	Bachelor of Science Honours in Environmental Management
2007	Nelson Mandela Metropolitan University	Bachelor of Science in Environmental Geography

CAREER ENHANCING COURSES:

2020	ISO 45001:2018 Understanding & Implementation (SABS)
2010	Assessor Training: USID 115753 (Team Consultants)
2010	Facilitator Training: USID 117871 (Team Consultants)
2010	SETA Internship: Project Management (SETA)

PROFESSIONAL AFFILIATIONS

SACNASP: Pr.Sci.Nat. 126835