



GOEDEHOOP COLLIERY: ROODEPOORT- WELVERDIEND

EXTERNAL ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT 2024 – 2025

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: 25 - 29 AUGUST 2025

**DMRE REFERENCE:
MP 30/5/1/2/2/ 57 MR**

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RELATED DOCUMENTS

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0.1	Environmental Management Programme for Goedehoop Colliery - Roodepoort-Welverdiend (Ref. MP 30/5/1/2/2/ 57 MR) dated October 2005	10.2005

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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 its thermal coal from 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 Services Operation provides various services to support the 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 and Appendix 7 of the Environmental Impact Assessment (EIA) Regulations (GN R982 of 04 December 2014), as amended, Section 24N (7)(d) of the National Environmental Management Act (NEMA) (Act 107 of 1998) and Regulation 55 of the Mineral Resources and Petroleum Development (MRPD) Regulations (GNR 527 of 23 April 2004), as amended, to assess their compliance with the Environmental Authorisations (EA) and Environmental Management Programmes (EMPr) issued to its operations. This report forms part of the performance assessments undertaken at the Goedehoop Colliery.

1.1. GOEDEHOOP COLLIERY

Goedehoop Colliery is an underground mining operation located approximately 15 - 25 km south-east of eMalahleni, within the eMalahleni and Steve Tshwete Local Municipalities and the Nkangala District Municipality in Mpumalanga. Goedehoop Colliery is subdivided into the Goedehoop North Colliery (previously Bank Colliery) and Goedehoop South Colliery (previously Goedehoop Colliery). Goedehoop North Colliery is currently the only active mining section with a remaining Life-of-Mine (LoM) ending in 2025. Mining operations at Goedehoop South Colliery ceased in 2019 and the mining area since been in process of rehabilitation and closure.

Mining operations at Goedehoop Colliery commenced at the Hope 2 Seam Shaft in April 1983 and extended to the Vlaklaagte 2 Seam in September 1995 and 4 Seam mines in October 1995. Goedehoop Colliery (Goedehoop South) and Bank Colliery (Goedehoop North) merged in 2005, with production from two underground shaft complexes. Goedehoop North Colliery operates under Mining Right MP 30/5/1/2/2/ (143) MR and Goedehoop South Colliery under Mining Right MP 30/5/1/2/2/1 (122) MR issued by the Department of Mineral Resources and Energy (DMRE) in terms of Section 39 (6) (now largely repealed) of the Mineral and Petroleum Resources Development Act (Act 28 of 2002) as well as the Environmental Management Programmes approved by the DMRE.

1.1.1. Goedehoop North Colliery

Goedehoop North Colliery (Figure 1) covers an area of approximately 8 540 Ha and currently operates one active mining underground operation at Simunye shaft, with four sections. Two conventional sections mining 2 Seam, one prime section and one conventional section mining the 4 Seam. Goedehoop North Colliery comprises of several historical mined and rehabilitated operations namely Brown Shaft, South Shaft, Northwest Shaft, East Shaft, Block 5, West Shaft and Block 10.

Goedehoop North Colliery primarily uses the bord-and-pillar underground mining method with a complement of Continuous Miners. Run-of-mine coal is brought to surface at the Simunye 4 seam shaft and is deposited at the ROM stockpile, which feeds the beneficiation plant. From the plant, processed coal is placed on the product stockpile, from where it is dispatched to local and international markets. The discard and slurry fractions generated in the beneficiation process are discarded at the Goedehoop North Co-Disposal Facility. The Return Water Dam, located east of the Co-Disposal Facility, collects dirty storm water runoff from the plant, stockpiles and Co-Disposal Facility.

Current operations are the only areas that are not rehabilitated and there is no backlog rehabilitation. The current LOM for Goedehoop North Colliery has 1 year remaining, ending in 2025.

This report presents the Performance Assessment Report (PAR) for Goedehoop North Colliery to verify compliance with the conditions of the EAs and EMPs 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.

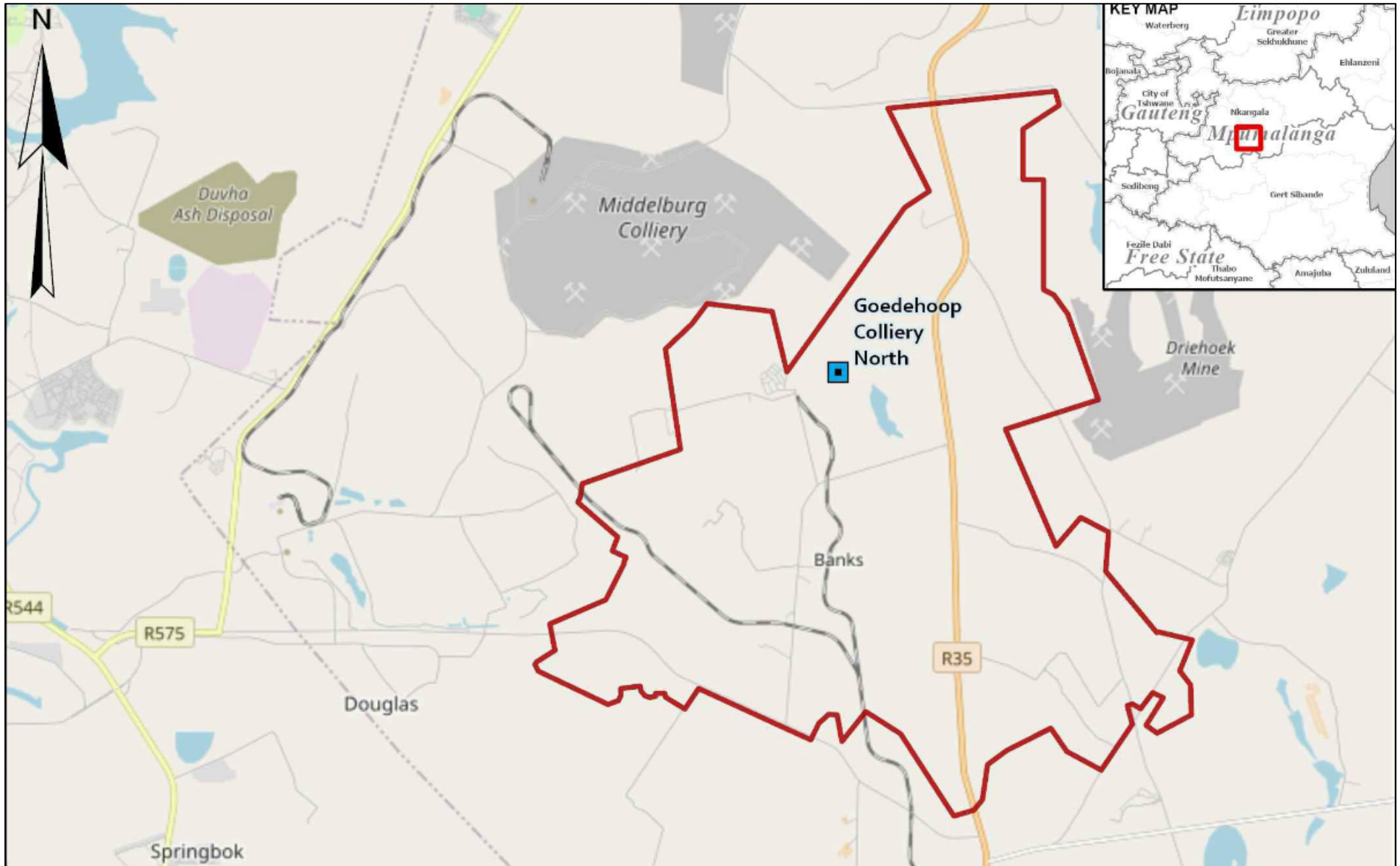


Figure 1. Locality Map of the Goedehoop North Colliery

2. PERFORMANCE ASSESSMENT TERMS OF REFERENCE

2.1. MINERAL AND PETROLEUM RESOURCES DEVELOPMENT REGULATIONS (GN R527 OF 23 APRIL 2023)

The performance assessment is undertaken in accordance with Regulation 55 of the MPRD Regulations (GN R527 of 23 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 04 DECEMBER 2014)

The EIA Regulations (GN R982 of 08 December 2014), as amended, were published in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) to regulate the process for preparing, evaluating, and submitting applications for EAs. Section 34 of the EIA Regulations (GN R982 of 2014) 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 EMPr, or if mitigation measures in the EMPr for managing environmental impacts are deemed to be inadequate, the audit report must provide recommendations to amend the EMPr 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. GOEDEHOOP NORTH COLLIERY ENVIRONMENTAL AUTHORISATIONS

The Environmental Authorisation issued to Goedehoop North Colliery that remained valid for the audit period and was audited in accordance with Section 34 of the EIA Regulations (GN R982 of 2014) and Section 55 of the MPRD Regulations (GNR 527 of 2004):

1. Environmental Management Programme for Goedehoop Colliery - Roodepoort-Welverdiend (Ref. MP 30/5/1/2/2/ 57 MR) dated October 2005.

2.4. GOEDEHOOP NORTH COLLIERY ENVIRONMENTAL MANAGEMENT PROGRAMMES

The Environmental Management Programmes issued to Goedehoop North Colliery that remained valid for the audit period and was audited in accordance with Section 34 of the EIA Regulations (GN R982 of 2014) and Section 55 of the MPRD Regulations (GNR 527 of 2004):

1. Environmental Management Programme for Goedehoop Colliery - Roodepoort-Welverdiend (Ref. MP 30/5/1/2/2/ 57 MR) dated October 2005.

2.5. ASSUMPTIONS AND LIMITATIONS

The scope of the performance assessment is to determine the level of Goedehoop North Colliery-Roodepoort Welverdiend's compliance with the conditions of the EA and/or EMPs listed in Sections 2.3 and 2.4. above 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 Goedehoop North Colliery.
- The assessment period is from August 2024 to August 2025. 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.
- Goedehoop North Colliery representatives may be called upon to provide information relating to specific activities within their respective areas.
- Goedehoop North Colliery is currently operational. Where current activities relate to construction, decommissioning or closure, these may be deemed as not applicable.
- Procedures developed by Goedehoop North 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 Goedehoop North Colliery are provided in Table 1. 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	Teboho Motinyane is a Principal Environmental Consultant 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 11 568 4701
		Fax: +27 86 665 1864
		Email: teboho@ntcgroup.co.za
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 11 568 4701
		Fax: +27 86 665 1864
		Email: tanja@ntcgroup.co.za

3.2. PERFORMANCE ASSESSMENT METHODOLOGY

3.2.1. Information Collation and Review

NTC Group (Pty) Ltd reviewed the conditions of the EA and/or EMPs listed in Sections 2.3 and 2.4. issued to Goedehoop North Colliery and compiled a Request for Information (RFI) document which provided a list of documents and records required from Goedehoop North Colliery to verify compliance with the conditions of the EA and/or EMP. The RFI was submitted to Goedehoop North Colliery and the requested information was availed to the auditors. The list of documents reviewed during the performance assessment are provided in Section 8. References.

Checklists were created verbatim of the conditions of Goedehoop North Colliery-Roodepoort Welverdiend's EAs/EMPs and used to assess compliance. The numbering in performance assessment checklists corresponds with the conditions of the EAs and EMPs as far as possible, to allow for ease of reference.

3.2.2. Site Verification

A site assessment was conducted on 25 - 29 August 2025 and was attended Teboho Motinyane (NTC), Tanja Bekker (NTC), Raisibe Mabiza (NTC), Dolly Mthethwa (Goedehoop Colliery), Lindokuhle Msiza (Goedehoop Colliery), Eva Seko (Goedehoop Colliery), and Caroline Perpermans (Pinsent Masons). During the site inspection, Goedehoop North Colliery-Roodepoort Welverdiend's personnel were interviewed and the facilities/ areas were inspected.

3.2.3. Assessment Methodology

NTC Group (Pty) Ltd assessed each condition of Goedehoop North Colliery-Roodepoort Welverdiend's EAs and the EMPs 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: 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.

3.3. 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 2004), as amended.
- Goedehoop North Colliery-Roodepoort Welverdiend EAs (refer to Section 2.3.) and EMPs (refer to Section 2.4.) that remained valid for the audit period.
- The scope of the assessment period between August 2024 – July 2025.
- The property boundaries of the Goedehoop North Colliery as shown in Figure 1.

4. PERFORMANCE ASSESSMENT RESULTS

This section provides results of performance assessment to verify compliance with the conditions of Goedehoop North Colliery-Roodepoort Welverdiend'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

TABLE 3. Environmental Management Programme for Goedehoop Colliery - Roodepoort-Welverdiend (Ref. MP 30/5/1/2/2/ 57 MR) dated October 2005.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
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TABLE 3. ENVIRONMENTAL MANAGEMENT PROGRAMME AMENDMENT (REF: (MP) 30/5/1/2/2 143 MR DATED JANUARY 2019 AND APPROVED DECEMBER 2019) FOR GOEDEHOOP COLLIERY: NORTH BANK

TABLE 1: ENVIRONMENTAL MANAGEMENT PROGRAMME FOR GOEDEHOOP COLLIERY - ROODEPOORT-WELVERDIEND (DMR REFERENCE NO. MP 30/5/1/2/2/ 57 MR DATED OCTOBER 2005)			
4.2. OPERATIONAL PHASE			
4.2.1 Geology			
	No management measures are proposed to mitigate the impact.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
4.2.2 Soil and land capability			
	The proposed extension will not have any impact on the soils and land capability of the area; therefore, no management measures are required.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
4.2.3 Fauna and Flora			
	The proposed mining extent will have no impact on the fauna and flora of the proposed extension area. It is therefore not considered necessary to provide management measures. However, the Biodiversity Assessment and Action Plan for Bank Colliery provides mitigation measures that mining related impacts on especially valuable habitats and species for the broader mining area.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.4 Surface Water			
4.2.4.1	Wherever possible, the surface water supply will be supplemented with water from the water pumped from underground mining sections and from the Return Water Dam and other pollution control dams to maximise the re-use of water.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.4.2	Quantities of water used for all major water users on the mine will be recorded and evaluated to determine where water waste occurs	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.4.3	Any complaints of loss of water from surrounding landowners will be investigated and measures implemented to rectify the problem immediately	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.4.4	A detailed water use licence process is currently being undertaken as part of the overall mine Integrated Water Use Licence Application which will determine the impact of the underground mining operation on water resources as well as all other related water issues. The study is being undertaken in parallel with this EMP.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.5 Groundwater			
4.2.5.1	Water pollution at the shafts will be kept to a minimum by limiting the time that underground water is exposed to the open rock faces where mining takes place.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.5.2	Underground water will continuously be pumped from the shafts to the Erikson dams as mining continues and does not leave the premises of the mine, since it is re-used within the mining area	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.5.3	Groundwater boreholes will be monitored (water levels and water qualities) on a quarterly basis.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.5.4	The extent of the cone of depression will be analysed Accordingly.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.5.5	If it is found that the mine causes a decrease in the yield of neighbour's borehole, the mine will provide an alternative water source to the affected user. However, the affected user must be able to prove scientifically that the mine is the cause of the reduced yield.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.6 Air Quality			
	The proposed mining extension will occur underground and therefore, have no impact on the surface air quality. No management measures are required	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
4.2.7 Noise			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	There are no noise impacts associated with the proposed extension as mining is underground and no surface infrastructure is required. No management measures are required	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
4.2.8	Sites of Archaeological and Cultural Significance		
	No sensitive landscapes and sites of archaeological and cultural interest were identified on the project area. No management measures are required	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
4.2.9	Social Impacts		
4.2.9.1	The mine will strive for successful implementation of the SLP	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.9.2	The mine will assist where possible, local municipalities in developing economic development plans to create jobs	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.9.3	The mine will align its community development plans with the integrated development plan of the local and district municipalities	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.10	Alternative Land Use and Development Options		
	No management measures required for this.	N/A	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
DECOMMISSIONING AND CLOSURE			
4.2.11	The mine will implement the SLP developed for Bank Colliery which addresses the processes pertaining to management of downscaling and retrenchment as per Regulation 46(d) of the Minerals and Petroleum Resources Development Act. The establishment of the future forums, mechanisms to ameliorate the social and economic impacts on individuals and mechanisms for the creation of alternative solutions and solutions for creating job security on closure of the mine.	N/A	Employees from Bank Colliery were employed during the operation of Goedehoop Colliery: Roodepoort - Welverdiend and no retrenchment process was required when the mine was decommissioned.
4.2.12	Monitoring and Management		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.12.1	Negative social and socio- economic Impacts as result of decommissioning and closure.	N/A	Employees from Bank Colliery were employed during the operation of Goedehoop Colliery: Roodepoort - Welverdiend and no retrenchment process was required when the mine was decommission.
4.2.12.2	The monitoring programme currently undertaken by Bank Colliery will be continued throughout the life of the mine. Surface water monitoring is carried out on a monthly basis, while groundwater monitoring is carried out on a quarterly basis by agreement with DWAF.	C	Goedehoop Colliery monitors groundwater quality on a quarterly basis and surface water is monitored monthly in accordance with the requirements of the authorised IWUL. As per the requirements of the IWUL the water quality reports are submitted to the DW&S.
4.2.12.3	During operation, the monitoring programme will monitor all significant impacts identified during the EIA. Management measures for all negative impacts will be determined in accordance with Best Available Technology. These management measures will be measurable and their effectiveness will be audited during the performance assessment or the EMP after approval.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.
4.2.12.4	The monitoring data will be documented, interpreted and reports on trends in the data will be submitted to DWAF on an annual basis.	C	Goedehoop Colliery monitors groundwater quality on a quarterly basis and surface water is monitored monthly in accordance with the requirements of the authorised IWUL. As per the requirements of the IWUL the water quality reports are submitted to the DW&S.
4.2.12.5	Should the water quality or the receiving surface water bodies and groundwater aquifers exceed the water quality objectives/target values set in the Water Use Licence (currently in progress), the reason for deterioration will first be investigated. If the quality cannot be improved, other alternatives or treatment options will be investigated.	C	The results in the Goedehoop Colliery Quarterly Water Quality Assessment Report for July 2024 to March 2025, do not indicate any water quality impact on the shallow aquifer associated from Roodepoort - Welteverdiend..
4.2.12.6	After closure, a set of compliance sampling points will be chosen, as defined by DWAF. These sites should reflect the effectiveness of closure rehabilitation. Generally, for a period of 1-3 years, surface grab samples are taken monthly. Later it may be possible to reduce the number of elements analysed. Groundwater will be analysed monthly for the first year after which it may be possible to reduce the sampling frequency to a quarterly basis. The groundwater monitoring assesses any pollution plumes and seep.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Mining operations at Goedehoop Colliery South: Roodepoort - Welverdiend have ceased and is currently under rehabilitation.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.12.7	All Anglo Coal operations, including Bank Colliery, will adopt and implement a biodiversity management strategy. Guidelines have been developed in conjunction with the operations to assist them in the process. Bank Colliery's Biodiversity Action Plan identifies areas of potentially high biodiversity value and recommends management measures to conserve and/or rehabilitate these areas.	C	The " <i>Biodiversity Action Plan</i> " (2019), was availed during the audit and provides the guideline for identifying biodiversity within the project area, determining the associated risks, providing recommendations and developing a site specific biodiversity management programme.

5. SUMMARY OF THE AUDIT FINDINGS

5.1. NON-COMPLIANCES

Based on the assessment undertaken during the current audit period, no non-compliances were identified with respect to Goedehoop North Colliery – Roodepoort Welverdiend's compliance with the conditions of the applicable Environmental Authorisations (EAs) and the Environmental Management Programme (EMPr), as evaluated in Section 4 of this report. This outcome demonstrates that the site has effectively implemented and maintained the prescribed environmental management controls and compliance obligations, reflecting a satisfactory level of environmental governance and adherence to regulatory requirements during the reporting period.

5.2. ACTIONS TO ADDRESS THE NON-COMPLIANCES

In light of the audit outcomes, no Action Plan is required at this stage. The continued effectiveness of compliance with the conditions of the Environmental Management Programme (EMPr) will be evaluated during the next external environmental performance assessment, which is currently scheduled to be conducted in 2026. This follow-up assessment will serve to confirm the sustained implementation and effectiveness of the prescribed environmental management measures.

5.3. RECOMMENDATIONS TO AMMEND CERTAIN CONDITION

In terms of Regulation 34(4) of the Environmental Impact Assessment Regulations (GN R984 of 2014), no recommendations are made to amend the conditions of the approved Environmental Management Programmes. Goedehoop North Colliery is assessed to largely comply with the conditions of its Environmental Authorisation and associated Environmental Management Programmes. The non-compliances identified during the audit are limited in nature and extent and can be adequately addressed through the implementation of appropriate corrective actions within a relatively short timeframe.

6. CONTINUAL IMPROVEMENT

The absence of any non-compliances during the current audit period indicates that Goedehoop North Colliery – Roodepoort Welverdiend has effectively implemented and sustained the requirements of the applicable Environmental Authorisations (EAs) and/or the Environmental Management Programme (EMPr). To support continuous improvement, it is recommended that the site maintains its proactive approach to environmental management through ongoing monitoring, regular internal reviews, and periodic refresher training to ensure continued awareness of regulatory and EMPr requirements. Additionally, opportunities to further enhance environmental performance should be identified through the evaluation of best practice initiatives, early identification of potential risks, and the continual optimisation of existing controls to ensure sustained compliance and improved environmental stewardship over time.

7. CONCLUSION

The audit concludes that Goedehoop North Colliery – Roodepoort Welverdiend has demonstrated full compliance with the conditions of the applicable Environmental Authorisations (EAs) and the Environmental Management Programme (EMPr) during the current audit period, as evidenced by the absence of any identified non-compliances. This outcome confirms the effective implementation and sustained application of the site's environmental management systems, controls, and monitoring measures, and reflects a strong level of environmental governance and regulatory adherence.

8. REFERENCES

- EMPR Addendum: Roodepoort-Welverdiend (Bank), Ref MP 30/5/1/2/2/57 MR, compiled by Anglo Coal, 25 August 2005.

APPENDIX A
AUDITOR DECLARATION

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

I, RAISIBE MABIZA, 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:

15 DECEMBER 2025

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

I, TEBOHO MOTINYANE, 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:

17 DECEMBER 2025

APPENDIX B

AUDITOR CURRICULUM VITAE



TEBOHO MOTINYANE

Company: NTC Group (Pty) Ltd

SACNASP: (126871) , IAIA-SA

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BRIEF PROFILE

Teboho has extensive training and experience in environmental science and land management disciplines with Mining Industry (Arnot Opco, Exxaro Resources, Sasol Mining, BHP Billiton Energy Coal South Africa and Universal Coal) of about 20 years. Prior to joining the Mining Industry, Teboho has more than 5 years with the then Department of Minerals and Energy (now DMRE). He holds an MSc in Environmental Science and BSc. Hons from Rhodes University (Makanda). He is also a member of the South African Council of Natural Scientific Profession (licensed in South Africa) and is a certified ISO14001 EMS auditor. Teboho has been responsible for leading and managing numerous and varied environmental and land management projects for over 15 years.

PROFESSIONAL QUALIFICATIONS

2002:MSc (Environmental Science) - Rhodes University

1999: B.Sc. Hons. Environmental Science - Rhodes University

1994: B.Sc. Physics and Physical Geography NUL

PROFESSIONAL AFFILIATIONS

SACNASP(126871)

IAIA-SA

PROJECT EXPERIENCE

- March 2025 – Present: **Principal Consultant**, Sandton, Johannesburg, South Africa).
- June 2020 – February 2025: **Environmental and Land Manager (Arnot Opco Mine**, Rietkul Middelburg, South Africa).
- June 2018 – May 2020: **Environmental Manager (Universal Coal New Clydesdale Colliery**, Kriel, South Africa).
- March 2017 – May 2018: **Environmental Specialist (Exxaro Arnot Mine**, Rietkul, South Africa).
- March 2016 – February 2017: **Environmental Practitioner (Sasol Mining – Brandspruit and Impumelelo Collieries**, Secunda, South Africa).
- August 2015 – February 2016: **Environmental Consultant (Commonground Environmental Consulting**, Middelburg, South Africa).

- August 2008 – July 2015: **Environmental Superintendent (BHP Billiton Energy Coal South Africa (BECSA) - Klipspruit and Wolvekrans Collieries** Ogies/Middelburg, South Africa).
- June 2006 – July 2008: **Environmental Specialist (Sasol Mining Support Services,** Secunda, South Africa).
- November 2002 – May 2006: **Assistant Director Environment (Department of Minerals and Energy,** Polokwane, South Africa).

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe my qualifications, my experience, and me.

Signature _____



RAISIBE MABIZA

Company: NTC Group (Pty) Ltd

Environmental Consultant

Mobile: +27 72 679 3782

Email: raisibe@ntcgroup.co.za

BRIEF PROFILE

Raisibe Mabiza holds a BSc Honours in Environmental Management and has over ten (10) years' industry experience as an Environmental Scientist. Her experience includes environmental compliance auditing of Environmental Authorisations (EAs), Environmental Management Programmes (EMPrs), Atmospheric Emission Licences (AELs), Water Use Licences (WULs), Waste Management Licences (WMLs), as well as environmental permitting (Environmental Impact Assessment (EIA), AEL, WUL, WML) and Environmental Control Officer (ECO). She has undertaken compliance auditing, environmental permitting and on-site compliance monitoring in the mining sector. She has been involved in projects from inception to closure as both a Project Assistant and Project Manager.

PROFESSIONAL REGISTRATIONS

SACNASP Professional Natural Scientist (123746)

PROFESSIONAL QUALIFICATION

2019: Bachelor of Science Honours in Environmental Management

2014: Bachelor of Science in Environmental Management & Geology

PROJECT EXPERIENCE

Raisibe has been involved in several projects as outlined below:

- Environmental Authorisation and licence compliance auditing
- Basic Assessment Reports
- Scoping and EIA
- Environmental Control Officer
- Environmental Management Programme reports
- Stakeholder Management
- Water Use License Applications
- Integrated Waste Management Plans
- Prospecting right applications
- Mining permit and mining right applications
- Assist with S24G application process