



# **GOEDEHOOP COLLIERY: SOUTH ADDENDUM FOR VAN DYKSDRIFT EXTENSION**

## **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 REFERENCES:  
MP 30/5/1/2/2/138 MR**

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### RELATED DOCUMENTS

NO.	DOCUMENT	DATE
0.5	Environmental management programme for Goedehoop colliery - Addendum for Van Dyksdrift Extension for Van Dyksdrift extension (DMRE reference. MP 30/5/1/2/3/2/138 (MR)	

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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 2024. Mining operations at Goedehoop South Colliery ceased in 2019 and has 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 Vlakraagte 2 Seam in September 1995 and 4 Seam mines in October 1995. Goedehoop Colliery 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 South Colliery

Goedehoop South Colliery shown in Figure 1, includes the Hope Section, Vlaklaagte Section and Springbok Section and cover an area of approximately 13 614 Ha. Coal mining at Goedehoop South Colliery ceased in 2019 and the area currently under a rehabilitation and maintenance programme. The current LoM for Goedehoop South Colliery has 9 years remaining, ending in 2033. Rehabilitated areas and facilities at Goedehoop South Colliery include:

- Hostels and the Springbok school.
- Block7, Block 8, Vlaklaagte Block 14, Hope Shaft, Klein Shaft, Seam 4 shaft and Block 20 inclusive of the conveyor belt.
- Main Offices.
- Springbok water treatment plant, security offices and sewage treatment plant.
- Hope water treatment plant and Goedehoop biodisk sewage plant.

The only remaining activity at Goedehoop South Colliery is the reclamation of the Discard Dump which is undertaken by a joint venture with Nasonti (Pty) Ltd. The Discard Dump reclamation includes a processing plant for the coarse discard which was constructed on top of the Discard Dump.

This report presents the Performance Assessment Report (PAR) for Goedehoop South Colliery to verify compliance with the conditions of the EAs and EMPs that remained valid for the assessment period (August 2024 – July 2025) and to determine the effectiveness of mitigation measures implemented to manage environmental impacts associated with their authorised activities.

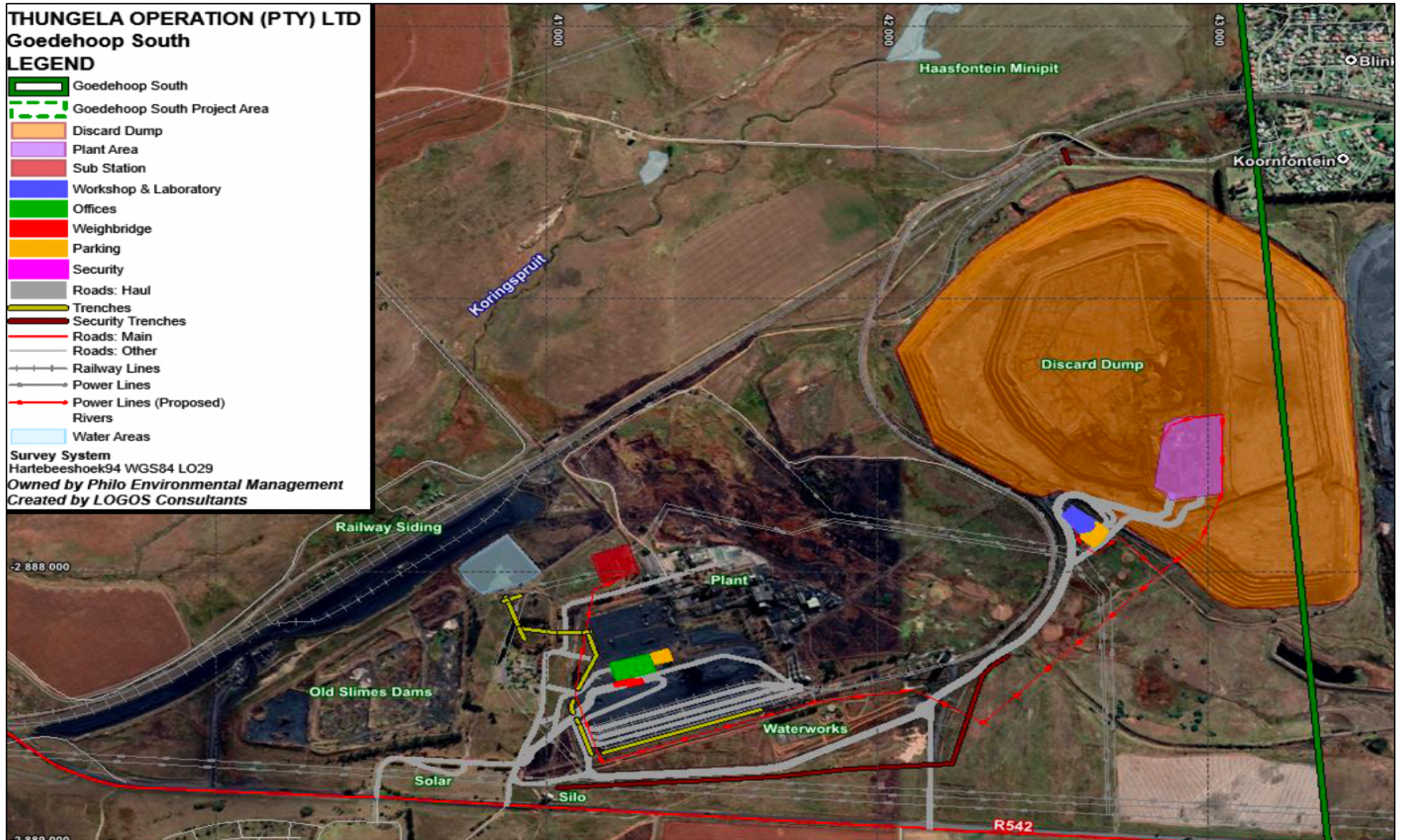


Figure 1. Locality Map of the Goedehoop South Colliery

## **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 SOUTH COLLIERY ENVIRONMENTAL MANAGEMENT PROGRAMMES**

The Environmental Management Programmes issued to Goedehoop South 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 - Addendum for Van Dyksdrift Extension for Van Dyksdrift extension (DMRE reference. MP 30/5/1/2/3/2/138 (MR)

### **2.4. ASSUMPTIONS AND LIMITATIONS**

The scope of the performance assessment is to determine the level of Goedehoop South Colliery's compliance with the conditions of the EA and EMPrs 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 South Colliery.
- The assessment period is from August 2024 - July 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 South Colliery representatives were called upon to provide information relating to specific activities within their respective areas.
- Goedehoop South Colliery is no longer operational and is rehabilitation and closure. Where current activities relate to construction, operation, decommissioning or closure, these may be deemed as not applicable.
- Procedures developed by Goedehoop South 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 South 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 holds an MSc in Environmental Science and has over 20 years of experience as an Environmental Manager in the coal mining sector. He is a member of the South African Council for Natural Scientific Professions and is a certified ISO 14001 EMS auditor. Throughout his career, Teboho has successfully led and managed a wide range of environmental and land management projects in the coal mining sector. Teboho was responsible for conducting the site inspection and reviewing the audit report.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: <a href="mailto:teboho@ntcgroup.co.za">teboho@ntcgroup.co.za</a>
LEAD AUDITOR	Raisibe Mabiza (Pr.Sci.Nat) is an Environmental Scientist contracted to NTC Group (Pty) Ltd. She has over 10 years' experience in the Environmental field inclusive of experience in the mining sector. Raisibe was responsible for conducting the site inspection, compiling the audit report and reviewing the supporting documentation.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: <a href="mailto:raisibe@ntcgroup.co.za">raisibe@ntcgroup.co.za</a>

#### 3.2. PERFORMANCE ASSESSMENT METHODOLOGY

##### 3.2.1. Information Collation and Review

NTC Group (Pty) Ltd reviewed the conditions of the EA and EMPs listed in Sections 2.3 and 2.4. issued to Goedehoop South Colliery and compiled a Request for Information (RFI) document which provided a list of documents and records required from Goedehoop South Colliery to verify compliance with the conditions of the EA and EMP. The RFI was submitted to Goedehoop South 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.

Checklists were created verbatim of the conditions of Goedehoop South Colliery's EAs and 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 Raisibe Mabiza (NTC), Teboho Motinyane (NTC), Tanja Bekker (NTC), Ziphelele Mthethwa (Goedehoop Colliery), Eva Seko (Goedehoop Colliery) and Caroline Perpermans (Pinsent Masons). During the site inspection, Goedehoop South Colliery's personnel were interviewed and the facilities/ areas were inspected.

### 3.2.3. Assessment Methodology

NTC Group (Pty) Ltd assessed each condition of Goedehoop South Colliery'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
<b>COMPLIANT</b>	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.
<b>NON-COMPLIANT</b>	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
<b>NOT APPLICABLE</b>	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.
<b>TAKE NOTE</b>	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 South Colliery's 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 South 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 South 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:

<b>TABLE 3.</b>	Environmental management programme for Goedehoop Colliery - Addendum for Van Dyksdrift Extension (DMRE Reference. MP 30/5/1/2/3/2/138 (MR)
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**Table 3: ENVIRONMENTAL MANAGEMENT PROGRAMME FOR GOEDEHOOP COLLIERY - ADDENDUM FOR VAN DYKSDRIFT EXTENSION FOR VAN DYKSDRIFT EXTENSION (DMR REFERENCE. MP 30/5/1/2/3/2/138 (MR)**

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<b>4.2. OPERATIONAL PHASE</b>			
<b>4.2.1</b>	<b>Geology</b>		
	No management measures are proposed to mitigate the impact.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.2</b>	<b>Topography</b>		
	No impacts on topography are predicted. No mitigation measures will be undertaken during the operational phase	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.3</b>	<b>Soil</b>		
	No impacts on soil are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.4</b>	<b>Land Capability</b>		
	No impacts on land use are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.5</b>	<b>Land Use</b>		
	No impacts on land use are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.6</b>	<b>Animal Life</b>		
	No impacts on animal life are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.7</b>	<b>Natural Vegetation</b>		
	No impacts on Natural vegetation are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.8</b>	<b>Surface Water</b>		

	<p>The levels of water in the pan will be monitored on a monthly basis continuous monitoring of possible surface lowering by the use of extensometers will be done on a monthly basis. In the event of unacceptable decrease in the levels of water in the pan an investigation will be undertaken Within a week after the notification of the lowering of water levels. Recommendations from the investigation will be undertaken Within two weeks after the completion of the investigation</p> <p>Dewatering and Discharge</p> <p>The seepage water accumulating in the underground workings will be pumped to the Goedehoop Colliery's dirty water system. Actions to manage impacts from these activities will be addressed under the groundwater section, below.</p>	T/N	<p>An extensive groundwater-monitoring network is established at Goedehoop Colliery for the whole mine taking the extension areas into consideration. The Goedehoop Colliery Quarterly Water Quality Assessment Report (July 2024 to March 2025) was provided. It should be noted that the Van Dyksdrift area was rehabilitated and decommissioned.</p>
<b>4.2.9</b>	<b>Groundwater</b>		
	<p>The static groundwater levels in all boreholes within a distance of less than 2 kilometres must be measured regularly on a quarterly basis. Continuous monitoring of possible major structures of preferred groundwater flow during mining Throughout the operational phase of mining. Any major structures of preferred groundwater flow such as dykes and fault zones should be grouted if excessive groundwater inflow is encountered as soon as the structures are identified. In the event of unacceptable decrease in the yield of any affected boreholes. alternative water supply will be supplied to the affected parties, one week after notice of decrease of yield of borehole.</p>	C	<p>An extensive groundwater-monitoring network is. The Goedehoop Colliery Quarterly Water Quality Assessment Report (January 2024 to March 2024) was availed. The Van Dyksdrift area was rehabilitated and decommissioned.</p>
<b>4.2.10</b>	<b>Air Quality</b>		
	<p>All machinery employed on site will be in good order. well maintained throughout operational phase and life mine. All machinery will be fitted with the correct exhaust systems, which will be maintained and in good order throughout operational phase life of mine. All mining vehicles will be required to obey set maximum speed limit. This will reduce the generation of dust throughout operational phase life of mine. Employees in the vicinity of the underground machinery will be issued with dust masks once every two weeks throughout life of mine if necessary, frequency will increase or decreased. Shift bosses Will ensure that masks are used by employees, as frequent as possible during working hours of the shifts. Dust suppression will be conducted in the underground working,</p>	N/A	<p>The condition falls outside the scope of the audit period (August 2024 - July 2025). Goedehoop Colliery South: Van Dyksdrift is no longer operational and has been decommissioned and rehabilitated.</p>
<b>4.2.11</b>	<b>Sensitive Landscapes</b>		
	<p>No impacts on sensitive landscapes are predicted. No mitigation measures will be undertaken during the operational phase.</p>	T/N	<p>The condition is noted and accepted by Goedehoop Colliery. No requirements apply.</p>
<b>4.2.12</b>	<b>Noise and Vibration</b>		
	<p>No impacts on noise and vibration are predicted. No mitigation measures will be undertaken during the operational phase.</p>	T/N	<p>The condition is noted and accepted by Goedehoop Colliery. No requirements apply.</p>

<b>4.2.13</b>	<b>Visual Aspects</b>		
	No impacts on visual aspects are predicted. No mitigation measures will be undertaken during the operational phase.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.14</b>	<b>Socio-Economic Impacts</b>		
	As far as practically possible, all supplies are obtained from the Greater Middelburg/Witbank area as outlined in the Social and Labour Plan for Goedehoop Colliery. As far as practically possible, mine employees are recruited from the greater Middelburg/Witbank area as outlined in the Social and Labour Plan for Goedehoop Colliery.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Goedehoop Colliery South: Van Dyksdrift is no longer operational and has been decommissioned and rehabilitated.
<b>4.2.15</b>	<b>Interested and Affected Parties</b>		
4.2.15.1	Adjacent landowners within a 2km radius, which show decreased borehole yields resulting from this mining venture, are compensated for by the drilling of new/additional boreholes to replace/supplement existing boreholes.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Goedehoop Colliery South: Van Dyksdrift is no longer operational and has been decommissioned and rehabilitated.
4.2.15.2	Reports generated during the course of all monitoring programs will be made available, on request, to all interested and affected parties. This includes any water quality monitoring reports; dust fallout reports or results from noise studies. No squatters are allowed on the property.	C	Goedehoop Colliery reported that the results of the water quality monitoring reports, dust fallout monitoring and noise monitoring are communicated during the community forum meetings and that the reports will be made available to interested and affected parties upon request. No squatters are allowed on the property.
4.2.15.3	Mine management is maintaining an open- door policy with all Interested and Affected Parties. Minutes of all meetings are kept and made available on request. All complaints received, are kept in complaints register.	C	Goedehoop Colliery reported that the monitoring reports will be made available to interested and affected parties upon request. A complaints register is kept and maintained by Goedehoop Colliery. No complaints were received for the audit period (August 2024 - July 2025).
<b>4.2.16</b>	<b>Historical and Cultural Aspects</b>		
	No impacts on historical and cultural aspects are predicted. No mitigation measures will be undertaken during the operational phase	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.2.17</b>	<b>Subsidence Management</b>		

Action	Time schedule
<b>Ensure that pillar failure does not re-occur</b>	
Remaining underground pillars will be monitored regularly, for signs of failure and for compliance with required safety factor	Once every month
Any pillar failure will be reported to Mine manager/representative immediately	On occurrence of pillar failure occur
Recommendation from Rock Engineering Services on required safety factor to avoid re-occurrence of pillar failure requested	Subsequently after reporting of pillar failure
Safety factor for the remaining portion of the mining area increased as recommended by Rock Engineering Services	Throughout remaining life of mine
<b>Ensure that the surfaces with subsidence, if any, caused by pillar failure are rehabilitated accordingly</b>	
The Mine Surveyor will survey the surface that is undermined.	Monthly for the entire operational phase
Monitoring of the undermined surfaces will be undertaken	Monthly for the entire operational phase
In the case of subsidence, topsoil on affected area will be stripped to a minimum depth of 300 mm over the affected area.	One week after noticing of subsidence
The affected area will be shaped to be free draining	Two weeks after noticing of subsidence
The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	Two weeks after noticing of subsidence

T/N

No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.

<b>Ensure that any fractures that promulgate to surface after settlement has occurred is managed properly</b>	
Fractures will be excavated to a minimum depth of 1.6 meters (stockpiling the upper 300 mm topsoil separately)	One week after noticing the fractures
Fractures will be backfilled using 150 mm compacted layers to a minimum thickness of 0,6 meters. (compaction to be 93% MOD AASHTO)	One week after noticing the fractures
Affected areas will be backfilled to 300 mm below surface level	One week after noticing the fractures
Finally covered and shaped to conform to the surface surroundings using a minimum 300 mm layer of topsoil.	Two weeks after noticing the fractures
<b>Ensure that the areas with surface water ponding are managed properly</b>	
Conduct visual monitoring of areas being undermined and that have already been undermined	Monthly for the entire operational phase
Areas with surface water ponding identified and reshaped to free draining topography as described in the above action plan	Two weeks after notice of water ponds
Areas reshaped checked for cracks and fractures and if fractures or cracks noticed above-mentioned action plan for fractures will be applied	As necessity arises during operational phase of the mine
<b>Ensure that the areas showing soil erosion are managed properly</b>	
Visual monitoring of areas being undermined, areas that have already been undermined conducted and areas rehabilitated as mentioned in the above action plan	Monthly for the entire operational phase
Areas showing signs of soil erosion identified and reshaped to free draining topography as described in the above action plan for surface subsidence and surface fractures	Two weeks after notice of erosion gullies
<b>Ensure that reshaping and backfilling of fractures, surface subsidence, soil erosion and water ponding dose not have detrimental impact on natural vegetation</b>	
Visual monitoring of the backfilled and reshaped areas for re-establishment of natural vegetation	Monthly after reshaping and backfilling of affected areas
In consultation with the land owners the affected areas will be re-vegetated with appropriate vegetation species	Annually during operational phase of mining

## 4.2. DECOMMISSIONING AND CLOSURE

### 4.3.1 Infrastructure Areas

Not applicable for this report, no infrastructure will occur in the area which will be mined

T/N

The condition is noted and accepted by Goedehoop Colliery. No requirements apply.

### 4.3.2 Ongoing Seepage Control

	During the decommissioning phase, detailed analysis will be conducted to determine the decant points (from the underground workings), and the best practicable means of intercepting and management of such decant (such as engineer designed Evaporation dams or treatment) as determined during the study will be instituted.	T/N	Goedehoop Colliery reported that no seepage incidents were recorded for Van Dyksdrift for the audit period (August 2024 - July 2025).
<b>4.3.3</b>	<b>Sealing of Underground Workings and Rehabilitation of Dangerous Excavations</b>		
	Note that a safety factor of more than 1.6 and more than 3.1 will be used for underground pillars on the proposed mining area and on the pan to be undermined respectively. This will ensure long term stability of the undermined surface.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Goedehoop Colliery South: Van Dyksdrift is no longer operational and has been decommissioned and rehabilitated.
<b>4.3.4</b>	<b>Shafts</b>		
	Not applicable to this report. An existing shaft i.e., vlaklaagte shaft will be used to access the Van Dyksdrift underground extension area.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.3.5</b>	<b>Rehabilitation of Opencast Working</b>		
	Not applicable as there are no opencast working	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
<b>4.3.6</b>	<b>Submission of Information</b>		
4.3.6.1	Complaints register – the complaints register will be maintained during the decommissioning phase, and submitted at the end of the decommissioning phase to the Department of Mineral and Energy	T/N	A complaints register is kept and maintained by Goedehoop Colliery. Goedehoop Colliery reported that no complaints were received for Van Dyksdrift for the audit period (August 2024 - July 2025).
4.3.6.2	Mining plan – the mining plan indicating the total extent of the underground workings will be submitted to the Department of Mineral and Energy within 1 year after decommissioning,	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025). Goedehoop Colliery South: Van Dyksdrift is no longer operational and has been decommissioned and rehabilitated.
4.3.6.3	Water quality monitoring reports – The current water monitoring program will continue through the decommissioning phase. An annual report will be generated detailing water quality trends experienced during the decommissioning phase and highlighting areas of concern. This report will be submitted to the Department of Water Affairs and Forestry	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.
4.3.6.4	Surface monitoring reports – The surface monitoring will continue through the decommissioning phase. An annual report will be generated detailing the findings of the surface monitoring during the decommissioning phase and will highlight areas of concerns.	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.

4.3.6.5	Environmental Audit reports – The performance assessment reports will be submitted to the Department of Mineral and Energy for onward transmission to other interested government departments. This performance assessment will continue until closure is gained. The frequency and basis on which the report will be submitted will be determined by the Department of Mineral and energy.	C	The auditors were provided with the most recent Performance Assessment Report "Thungela Goedehoop Colliery: South, External Environmental Performance Assessment Report 2023 - 2024" (December 2024) compiled by NTC Group (Pty) Ltd and submission of the report to the DMRE was verified.
<b>4.3.7 Maintenance</b>			
	Surface monitoring report - The current water quality monitoring program will be continued, until it can be shown that water quality (surface and groundwater) is both stable and within acceptable guidelines and limits, as determined by the relevant state departments. Frequency of monitoring will remain monthly for the surface water monitoring point and three monthly for groundwater monitoring points for the first three years after closure. Thereafter, the frequency for surface water monitoring points will decrease to 3 monthly and the groundwater monitoring points to 6 monthly. This will again be reviewed after a further 2 years.	C	Goedehoop Colliery conducts monthly surface water monitoring 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.
<b>4.3.8 Surface Subsidence</b>			
	No surface subsidence will occur	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.

## **5. SUMMARY OF THE AUDIT FINDINGS**

### **5.1. NON-COMPLIANCES**

Based on the assessment undertaken during the reporting period, no non-compliances were identified in relation to Goedehoop South Colliery Addendum for Van Dyksdrift Extension compliance with the conditions of the applicable Environmental Authorisations (EAs) and Environmental Management Programmes (EMPrs), as evaluated in Section 4 of this report. This outcome indicates that the Kleinfontein Section has effectively implemented and maintained the required environmental management controls and monitoring measures, demonstrating a satisfactory level of compliance with regulatory requirements and sound environmental governance practices during the audit period.

### **5.2. ACTIONS TO ADDRESS THE NON-COMPLIANCES**

No action/s needed.

### **5.3. RECOMMENDATIONS TO AMMEND CERTAIN CONDITION**

In accordance with Regulation 34(4) of the Environmental Impact Assessment Regulations (GN R984 of 2014), no recommendations are proposed to amend the conditions of the approved Environmental Management Programme.

## **6. CONTINUAL IMPROVEMENT**

The absence of non-compliances at Goedehoop South Colliery Addendum for Van Dyksdrift Extension reflects the effective implementation of environmental management controls and monitoring measures.

## **7. CONCLUSION**

Based on the assessment undertaken during the reporting period, no non-compliances were identified in relation to the Goedehoop South Colliery Addendum for the Van Dyksdrift Extension with respect to compliance with the conditions of the applicable Environmental Authorisations (EAs) and Environmental Management Programmes (EMPrs), as evaluated in Section 4 of this report. This outcome confirms that the Kleinfontein Section has effectively implemented and consistently maintained the required environmental management controls and monitoring measures. Overall, the audit results demonstrate a satisfactory level of compliance with regulatory requirements and reflect sound environmental governance and management practices throughout the audit period.

## 8. REFERENCES

- Approval of EMP\_Addendum for Van Dyksdrift Extension Ref (MP) 30/5/1/2/3/2/1 (466) EM, date 16 May 2019, Department of Mineral Resources.

**APPENDIX A**  
**AUDITOR DECLARATION**

## ENVIRONMENTAL PRACTITIONER'S DECLARATION:

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### 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:

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### 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:**



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**COMPANY:**

NTC GROUP (PTY) LTD

**DATE:**

15 DECEMBER 2025

**APPENDIX B**  
**AUDITOR CURRICULUM VITAE**



#### **TEBOHO MOTINYANE**

Company: NTC Group (Pty) Ltd

SACNASP: (126871) , IAIA-SA

Mobile: +27 (0) 82 459-6874

Email: [teboho@ntcgroup.co.za](mailto:teboho@ntcgroup.co.za)

#### **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](mailto: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