



**ELDERS COLLIERY**

**PERFORMANCE ASSESSMENT REPORT  
FOR THE  
ENVIRONMENTAL EXTERNAL AUDIT 2024/ 2025**

Submitted in fulfilment of Section 24N(7)(d) of the National Environmental Management Act (Act 107 of 1998) and Regulation 34 of the Environmental Impact Assessment Regulations (GN No. 982 of 2014), as amended.

**ENVIRONMENTAL AUTHORISATION REF:**

**MP 30/5/1/2/3/2/1 (10117)**

**AUDIT DATE: 1-4 APRIL 2025**

**PREPARED BY:**

NTC GROUP (PTY) LTD  
CDH BUILDING  
1 PROTEA PLACE  
SANDTON 2031

TEL: +27 11 462 2022

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

**PREPARED FOR:**

ELDERS COLLIERY  
PO BOX 1521  
SAXONWOLD  
2132

SOUTH AFRICA

TEL: 013 691 5532

EMAIL: [eva.seko@thungela.com](mailto:eva.seko@thungela.com)

**DOCUMENT CONTROL****VERSION CONTROL**

NO.	DATE	OVERVIEW OF CHANGES	AUTHOR
0.1	10 December 2025	Create Report	Ampfarisaho Sigonde
0.2	11 December 2025	Review Report	Teboho Motinyane
0.3		Approve	Eva Seko

**DISTRIBUTION LIST**

NAME	EMAIL ADDRESS
Eva Seko	<a href="mailto:Eva.Seko@thungela.com">Eva.Seko@thungela.com</a>
Nadine Joubert	<a href="mailto:nadine.joubert@thungela.com">nadine.joubert@thungela.com</a>
Kgaowelo Moshokwa	<a href="mailto:kgaowelo.moshokwa@thungela.com">kgaowelo.moshokwa@thungela.com</a>

**REQUIRED APPROVALS**

NAME	POSITION	DATE
Eva Seko	Elders Colliery Environmental Superintendent	<i>Eva Seko</i> 2025/12/17

**RELATED DOCUMENTS**

Elder

NO.	DOCUMENT	DATE
0.1	<b>Elders Environmental Authorisation:</b> (MP) 30/5/1/2/3/2/1/ (10117)	29 July 2020
0.2	<b>Elders Environmental Management Program:</b> (MP) 30/5/1121312111(10117) EM	29 July 2020
0.3	<b>Elders Environmental Authorisation:</b> (MP) 30/5/1121312111(10117)	08 June 2023
0.4	<b>Elders Environmental Management Program:</b> (MP 30/5/1121312111(10117) EM	08 June 2023

## **DISCLAIMER AND TERMS OF USE**

This document has been prepared by NTC Group (Pty) Ltd with reasonable skill, care, and diligence, in due consideration of the manpower, timescales and resources devoted to it in terms of their appointment by Thungela Operations (Pty) Ltd (Thungela) (the client) to carry out part or all the services. It is subject to the terms and conditions of that appointment. NTC shall not be liable for the use of or reliance on any information, advice, recommendations, and opinions in this document for any purpose by any person other than the client. Reliance may be granted to a third party only if NTC Group (Pty) Ltd and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by NTC Group (Pty) Ltd, and/or information supplied by the client and/or its other advisors and associates. This data has been accepted in good faith as being accurate and valid.

NTC Group (Pty) Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work. The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in NTC Group (Pty) Ltd unless the terms of appointment state otherwise.

This document may contain information of a specialised and/ or highly technical nature, and the client is advised to seek clarification on any elements which may be unclear to it. Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

## TABLE OF CONTENTS

NO.	DESCRIPTION	PAGE NO
<b>1.</b>	<b>INTRODUCTION</b> .....	<b>1</b>
1.1.	BACKGROUND .....	1
1.2.	AUDIT TERMS OF REFERENCE .....	5
1.3.	AUDIT ASSUMPTIONS AND LIMITATIONS .....	7
<b>2.</b>	<b>AUDIT TEAM</b> .....	<b>8</b>
<b>3.</b>	<b>AUDIT METHODOLOGY</b> .....	<b>9</b>
3.1.	INFORMATION COLLATION AND REVIEW .....	9
3.2.	SITE VERIFICATION .....	17
3.3.	ASSESSMENT METHODOLOGY .....	17
<b>4.</b>	<b>AUDIT RESULTS</b> .....	<b>19</b>
<b>5.</b>	<b>SUMMARY OF THE AUDIT</b> .....	<b>134</b>
5.1.	NON-COMPLIANCES .....	134
5.2.	RECOMMENDATIONS .....	134
<b>6.</b>	<b>CONTINUED IMPROVEMENT</b> .....	<b>141</b>
<b>7.</b>	<b>CONCLUSION</b> .....	<b>142</b>

## LIST FIGURES

Figure 1: Elders Colliery Project Locality Map .....	3
Figure 2: Elders Colliery Site Layout Diagram .....	4

## LIST OF TABLES

Table 1: Details of the Audit Team.....	8
Table 2: Assessment Criteria.....	18
Table 3. Environmental Authorisation (MP) 30/5/1121312111 (10117) EM dated 29 July 2020.....	20
Table 4: Environmental Management Program (MP) 30/5/1121312111(10117) EM dated 29 July 2020 .....	39
Table 5: Environmental Authorisation (MP) 30/5/1121312111(10117) EM dated 08 June 2023.....	81
Table 6: Environmental Management Program (MP) 30/5/1121312111(10117) EM dated 08 June 2023 .....	101
Table 7. Summary of Non-Compliances and Recommendations.....	135

## APPENDICES

- APPENDIX A: AUDITORS DECLARATION
- APPENDIX B: AUDITORS CURRICULUM VITAE

## 1. INTRODUCTION

---

NTC Group (Pty) Ltd was appointed by Thungela Resources (Pty) Ltd as an independent Environmental Assessment Practitioner (EAP) to undertake the 2024-2025 annual external compliance audit of the Environmental Authorisation (EA) and Environmental Management Programme (EMPR) issued to Elders Colliery. This report presents the Performance Assessment Report for the audit period April 2024 – March 2025.

### 1.1. BACKGROUND OF ELDERS COLLIERY

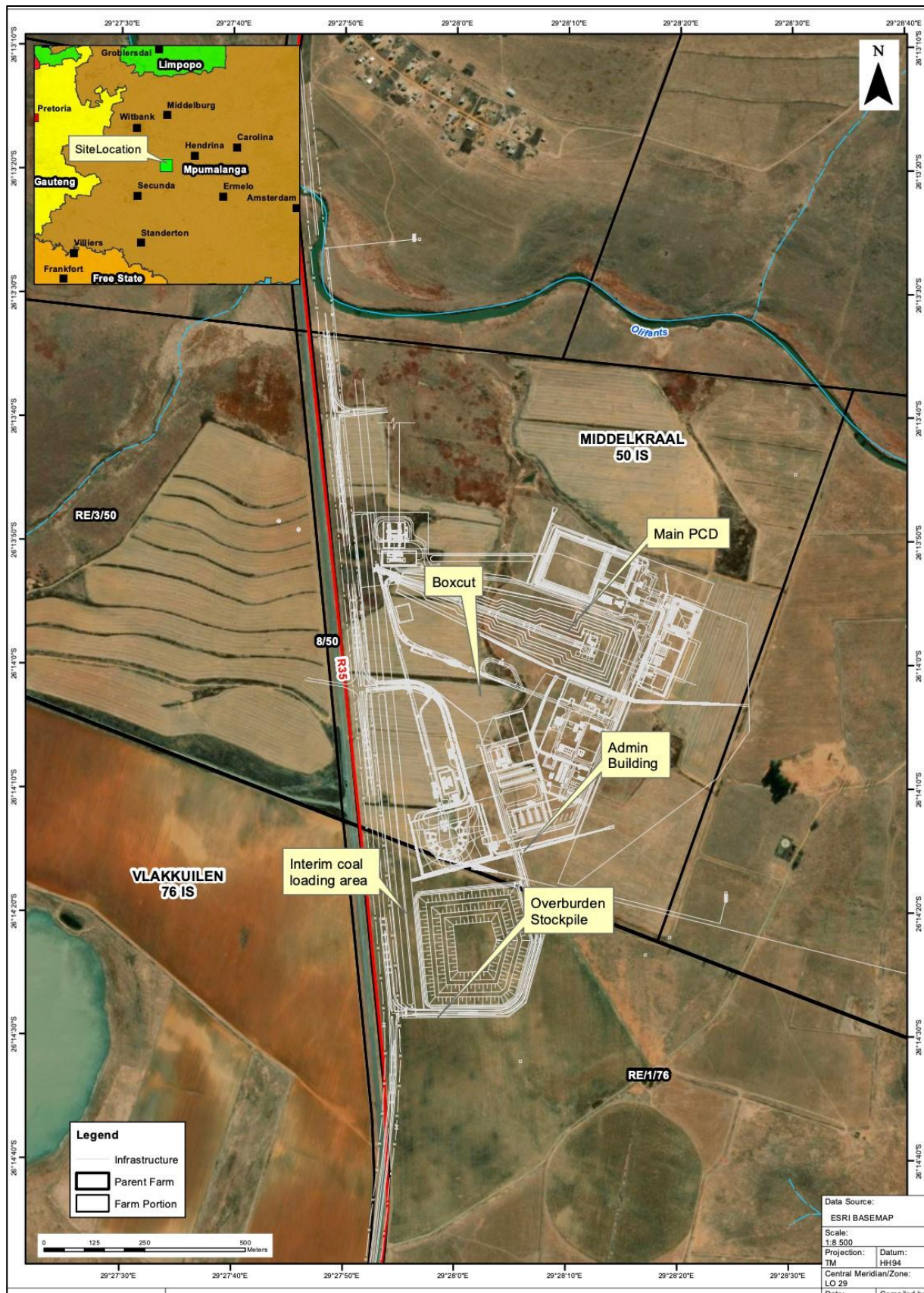
Thungela Resources (Pty) Ltd (hereafter, Thungela) predominantly has high quality thermal coal mines in South Africa by calorific value and export mainly to the Indian, Asian, SEA, Middle East, and North African markets. The Elders Colliery is a member of Thungela and is situated approximately 25 km north of the Bethal town, along the R35 provincial road (Figure 1). Elders Colliery is located within both Govan Mbeki Local Municipality (GMLM) and Steve Tshwete Local Municipality (STLM), which fall within the Gert Sibande District Municipality (GSDM) and the Nkangala District Municipality (NDM) respectively (Refer to Figure 1).

Elders Colliery is authorised to conduct mining activities which includes underground mining using the bord and pillar mining methods which will be accessed through a Boxcut to the seam No. 2 and seam No. 4 coal resources. Additional infrastructures authorised includes powerlines, pipelines, bulk storage for fuel, topsoil stockpiles, overburden stockpile, sewage treatment plant, coal conveyer belt, pollution control dam, water treatment plant, storage of explosive, primary crusher, service road, fencing and water management infrastructure (Refer to Figure 2). Elders Colliery is still in the construction phase, which commenced in September 2022. The planned Life of Mine is approximately 28 years. The project will take place in three phases. The proposed schedule for the phases is between 3 and 5 years to construct.

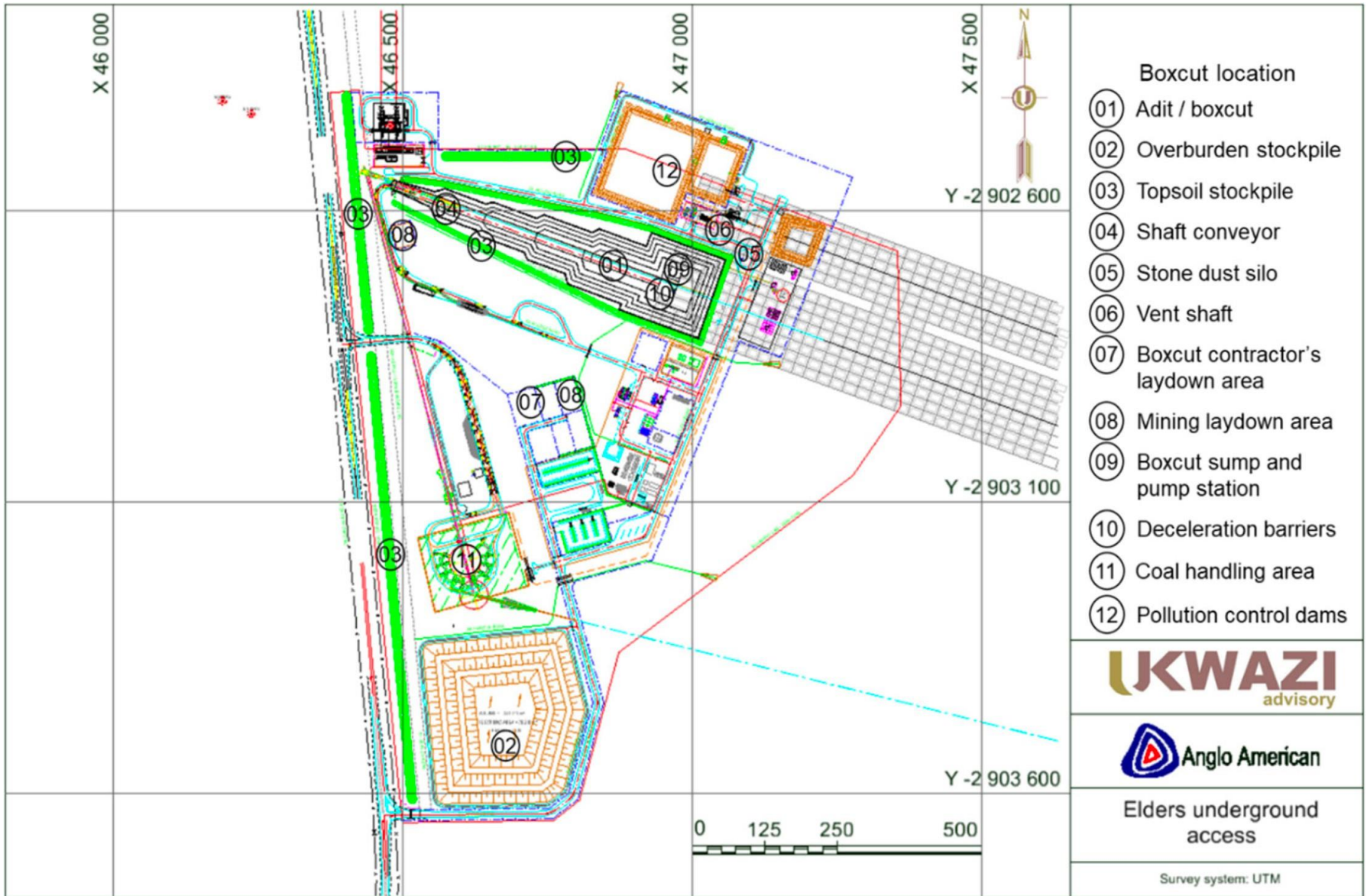
Elders Colliery was owned by Anglo Operations (Pty) Ltd (AOPL) when it applied to the Mpumalanga Department of Mineral Resources and Energy (DMRE) for an Environmental Authorisation on 16 July 2015. AOPL submitted an Environmental Management Programme (EMPr) to the DMRE on 25 January 2016 for approval.

AOPL subsequently submitted a Section 11 application in terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002) (MPRDA) to the DMRE to transfer the Elders Mining Right from AOPL to Anglo American Inyosi Coal (Pty) Ltd (now a member of Thungela Resources). The mining right and Deed of Cession was executed in July 2020. The Environmental Authorisation (MP) 30/5/1/2/3/2/1/ (10117)) was issued by the DMRE on 29 July 2020.

Thungela then applied for an Environmental Authorisation in November 2021 for proposed changes to the Elders Colliery, which included a change in mine plan, block plan, additional transport method coal, storage of coal of in a steel bin for truck loading and widening of the R35 to aid access to the proposed Elders Colliery. The Environmental Authorisation (MP) 30/5/1/2/3/2/1/ (10117) was issued by the DMRE 08 June 2023.



**Figure 1: Elders Colliery Project Locality Map**



**Figure 2: Elders Colliery Site Layout Diagram**

## 1.2. AUDIT TERMS OF REFERENCE

The Mineral and Petroleum Resources Development Act (Act 28 of 2002) (MPRDA) Government Notice Regulation (GNR) 527, regulation 55 thereof, requires the monitoring and performance assessments of Environmental Management Programme Report (EMPR) which are now known as Environmental Authorisations (EA) to assess the continued appropriateness and adequacy of the EMPR/ EA. GNR 527 (55) requires the holder of the EA to:

- Conduct continuous monitoring.
- Conduct performance assessments.
- Compile and submit Performance Assessment Reports (PAR) to the Department of Mineral Resources and Energy (DMRE).

Regulations 55 (2) state that the frequency of PAR will either be specified in the approved EMPR, every two years or as agreed to in writing by the Minister. Regulation 55(4) adds that the holder of the mining right may appoint an independent competent person(s) to conduct a performance assessment and compile a PAR.

However, in 2014, the MPRDA was amended (No.49 of 2009) and aligned with the National Environmental Management Act (No. 107 of 1998) (NEMA) as amended. Section 39 – 42 relating to the EMPR development, management, financial provisions etc. were repealed and Section 38 A and B were inserted. Section 38 B of the MPRDA states "*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*". However, the 2014 NEMA Environmental Impact Assessment (EIA) Regulations were again amended on 7 April 2017 and 11 June 2021 retrospectively.

Regulation 34 is hereby amended in terms of the NEMA EIA Regulations dated 11 June 2021 and states amongst others, that the holder of an EA must, for the period during which the Environmental Authorisation, EMPR and the closure plan, in the case of a closure activity remain valid; a) ensure that the compliance with the conditions of the Environmental Authorisation, the EMPR, and the closure plan is audited; and b) submit the environmental audit report to the relevant Competent Authority. Regulation 34 is further amended to indicate *inter alia*, that the audit findings must be verifiable, in a structured and systematic manner on the level of performance against and compliance of the organisation's EA, it further states that the recommendations to amend the EMPR for rectification of the shortcomings must be subjected to Public Participation for approval by the Competent Authority.

As a result of the above, Environmental Authorisation is required to undergo regular auditing in accordance with NEMA EIA Regulations and Appendix 7 as amended in the 2011 EIA Regulation. The frequency is stipulated in the EA / Exploration Right itself, specifically annually.

The Department of Mineral Resources and Energy has issued Elders Colliery with two Environmental Authorisations:

1. Integrated Environmental Authorisation (Ref: (MP) 30/5/1/2/3/2/1/ (10117) EM dated 29 July 2020) issued in terms of the National Environmental Management Act, 1998 (NEMA), as amended, the Environmental Impact Assessment (EIA) Regulations, 2014 and the National Environmental Management: Waste Act and Government Notice 921 of 2013 for proposed mining and associated infrastructure in respect of Portions 3 and 10 of the Farm Elandsfontein 75 IS, Portions 1 and 2 of the Farm Geluk 226 IS, Portion 2,3,4 12 and 13 of the Farm Halfgewonden 190 IS, Portions 0, 3, 5 and 6 of the Farm Middelkraal 50 IS, Farm Legdaar 78 IS, Farm Schurvekop 227 IS, Farm Schoonvlei 52 IS, Kleinfontein 49 IS, Goedehoop 46 IS and Koorfontein 27 IS, situated in the Magisterial District of Gert Sibande in Mpumalanga Region.
2. Integrated Environmental Authorisation (Ref: (MP) 30/5/1/2/3/2/1/ (10117) EM dated 08 June 2023) issued in terms of the National Environmental Management Act, 1998 (NEMA) as amended, the Environmental Impact Assessment (EIA) Regulations, 2014 and the National Environmental Management: Waste Act and Government Notice 921 of 2013 for proposed mining and associated infrastructure in respect of Portions 3 and 10 of the farm Elandsfontein 75 IS, Portion 1 and 2 of the farm Geluk 226 IS, Portion RE/2, RE/3, Portion of Portion 4, Portion 12/3 and Portion 13/3 of the farm Halfgewonden 190 IS, Portions RE- 5/1, 6/1, 7/1, 16/5 and RE- 17/5 of the farm Legdaar 78 IS, Portion of Portion RE, Portion RE3, Portion RE 5, Portion 6/3, 8/3 of the farm Middelkraal 50 IS, Portions RE/7,12/5, 13/5,14/6, 22/10, RE/26, Portion 27/26, 28/26 of the farm Schurvekop 227 IS and Portion RE of the farm Vlakkuielen 76 IS situated in the Magisterial District of Bethal in Mpumalanga region.

Following from the above, the approved the Environmental Management Program submitted in the application for above Environmental Authorisations form part of the compliance audits which must be submitted to the relevant competent authority. The EMPs associated with the above EAs are listed below:

1. SRK Consulting (Reference 484436 dated January 2016): Elders Colliery Environmental Impact Assessment Report and Environmental Management Programme Report submitted for Environmental Authorizations in terms of the National Environmental Management Act, 1998 and the National Environmental Management Waste Act, 2008 in respect of Listed Activities that have been triggered by Applications in terms of the Mineral and Petroleum Resources Development Act, 2002(MPRDA) (as amended) (pp 196 - 208).

2. SRK Consulting (Reference 570283 dated November 2021): Final Integrated Environmental Impact Assessment Report and Environmental Management Programme Report for the proposed Elders Colliery Project (pp 198 - 213).

NTC Group (Pty) Ltd was appointed by Thungela as the independent Environmental Assessment Practitioner (EAP) to undertake the 2024-2025 annual external compliance audit of the Environmental Authorisation (EA) and Environmental Management Programme (EMPR) issued to Elders Colliery. This report presents the Performance Assessment Report thereof for the audit period, April 2024 – March 2025.

### **1.3. AUDIT ASSUMPTIONS AND LIMITATIONS**

The scope of the compliance assessment was to assess the environmental management practices implemented during construction of the Elders Colliery, in accordance with the approved Environmental Authorisation and Environmental Management Programme.

The methodology of the audit included a review of documents and reports and interviews with relevant Elders Colliery employees, to determine if the construction activities at Elders Collieries complies with its approved EA and EMPr.

The following assumptions and/ or limitations will be applicable to the audit process and findings:

- This audit is a snap-shot representation of the current activities at Elders Colliery.
- The audit assessment period is from April 2024 to March 2025. Conditions which refer to activities occurring prior to this audit assessment period are assumed to have been previously audited and will thus not be audited. Such items are determined to be "Not Applicable".
- Due to the nature and extent of the operation, not all areas may be visited during the site assessment. Elders Colliery representatives may be called upon to provide information relating to specific activities within their respective areas.
- Elders Colliery is in construction phase, however, where current activities relate to operation, decommissioning, closure, or rehabilitation, these will be deemed applicable and included in the audit period.
- Procedures developed by Elders Colliery specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System by site personnel.
- Outdated/ repealed legislation or referenced guideline documents in the EA and EMPr will be substituted for current/ relevant legislation and referenced guideline documents.

## 2. AUDIT TEAM

NTC GROUP (PTY) LTD was established in 2005. It is 100% female black owned with a Level 1 Broad Based Black Economic Empowerment (BBBEE) Rating. We undertake our services with professional integrity, and we have built good reputations with stakeholders in the environmental management field including regulatory authorities and government departments. We undertake all our services within the requirements of applicable South African legislation, as well as acceptable international best practices, Norms and Standards. The details of the specific environmental team that participated in the Performance Assessment at Elder Colliery are provide. The declaration of the auditor’s independence is attached in Appendix A.

**Table 1: Details of the Audit Team**

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
<b>Lead Auditor</b>	Tanja Bekker is the Environmental Scientist at NTC Group (Pty) Ltd. Tanja holds an MSc Environmental Management, as well as a Certificate in Lead Auditor and has over 22 years of extensive experience in the Environmental Management field inclusive of performance assessment audits and compliance monitoring.	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: <a href="mailto:tanja@ntcgroup.co.za">tanja@ntcgroup.co.za</a>
<b>Lead Auditor</b>	Mary-Anne Carter (MSc) is a Senior Consultant at NTC Group (Pty) Ltd. Mary-Anne holds an MSc in Environmental Science with experience in environmental applications (EIA, BAS Waste Licenses, and Air Emissions Licenses etc.), environmental auditing, EMS implementation, training, environmental monitoring and identifying C implementing sustainable project.	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: <a href="mailto:mary-ann@ntcgroup.co.za">mary-ann@ntcgroup.co.za</a>
		Fax: +27 86 665 1864
<b>Auditor</b>	Shandré van der Merwe is an Environmental Consultant with over 3 years’ experience in the Environmental Management field and within the mining sector. Shandre was the Auditor that undertook the audit preparations, site assessment and audit report compilation.	Tel: +27 11 462 2022
		Fax: +27 86 665 1864
		Email: <a href="mailto:shandre@ntcgroup.co.za">shandre@ntcgroup.co.za</a>

### 3. AUDIT METHODOLOGY

---

#### 3.1. INFORMATION COLLATION AND REVIEW

NTC Group reviewed the EAs and EMPRs issued to Elders Colliery and compiled checklists according to the licenses indicated in Section 1, which contained the conditions verbatim (Table 3, Table 4, Table 5 and Table 6) that required compliance assessment. During the audit checklist compilation, NTC developed and submitted an information request to Thungela: Elders to begin collation and review thereof. The information verified during the audit included *inter alia*:

- Fw 2023 External Audit Findings.Xlsx. Msg Social • Updated Apr 17, 2024 By Eva Seko
- Thungela Minutes 8 February 2024 Social - Updated Apr 17, 2024 By Eva Seko Govan Mbeki Municipality (Gmm) Minutes Of The Social Labour Plan Quarterly Meeting With Thungela Resources.
- Meeting With Vlakkuielen Working Committee.Docx Social • Updated Apr 17, 2024 By Eva Seko
- Re 2023 External Audit Findings.X/S.Msg Social - Updated Apr 17, 2024 By Eva Seko
- Meeting Minutes Vlakkuielen Committee 21st July 2019 \_Kb(Ii).Docx Social - Updated Apr 17, 2024 By Eva Seko
- Elders Community Engagement April 2022-Sh Circ1 Social - Updated Apr 17, 2024 By Eva Seko Thungela Elders Underground Access Project - Stakeholders Intro
- Meeting Feedback With Contractor And Vlakkuielen Working Committee.Docx Social - Updated Apr 17, 2024 By Eva Seko
- Meeting Feedback Vlakkuielen Committee 17 Oct 2019 Docx Social - Updated Apr 17, 2024 By Eva Seko
- Elders Slp Meeting With Doorstep Community Representatives Docx Social - Updated Apr 17, 2024 By Eva Seko
- Elders Colliery Bethal And Surrounding Areas Smme Information Session 09 Sept 2022.Pptx Social • Updated Apr 17, 2024 By Eva Seko
- Elders Colliery Bethal C Surrounds Local Smme Information Session 09 September 2022.Pptx Social - Updated Apr 17, 2024 By Eva Seko
- Elders Colliery Stakeholder Update 26 April 2022.Docx Social - Updated Apr 17, 2024 By Eva Seko
- Cef Minutes Elders Colliery 25 May 2023 E Social • Updated Apr 17, 2024 By Eva Seko Elders Colliery - Community Forum Meeting-Meeting Minutes
- Copy Of WBHO Local Employees(1426).Xlsx Social • Updated Apr 17, 2024 By Eva Seko
- Copy Of Stakeholder Surrounding Community Register Updated.Xisx Social • Updated Apr 17, 2024 By Eva Seko

- Cef Elders Colliery August 2023.Docx Social • Updated Apr 17, 2024 By Eva Seko
- Attendance Register Thungela 8 February 2024 Department Of Planning And Economic Development Slp Quarterly Meeting Between Govenmbeki Municipality And Thungela Resources To Be Held On The 08 February 2024, Planning And Economic Development At 14h00 Attendance Register
- CEF Minutes Elders Colliery 25 May 2023.Docx Social - Updated Apr 17, 2024 By Eva Seko
- CEF Elders Colliery 25 May 2023.Docx Social - Updated Apr 17, 2024 By Eva Seko Elders Colliery - Community Forum Meeting- Meeting Minutes
- Agenda Meeting 14 August 2023.Doc Social - Updated Apr 17, 2024 By Eva Seko Elders Colliery - Community Forum Meeting
- CEF Meeting 23 January 2024 Docx Social - Updated Apr 17, 2024 By Eva Seko
- DMRENO-1 Eco Appointment - Updated Apr 11, 2024 By Gustav Nic Le Roux Notification Of Intent To Commence Construction Activities At Elders Colliery Mine In Emalahlent And The Appointment Of The Independent Eco
- DMRE notification of appointment of ECO for Elders colliery. EML
- Event Details-09042024-38 Incidents • Updated Apr 11, 2024 By Eva Seko
- Water Into Wetland Incident March 2024.Docx Incidents - Updated Apr 9, 2024 By Liezel Louw Elders Colliery: Dust Suppression With Mine Impacted Water Resulting In The Flow Of The Water Into Adjacent Wetlands Outside The Perimeter Fence. An Earth Trench Was Constructed In The Wetland To Allow The Flow Of Water.
- Water Into Wetland Incident March 2024 E-Classification Final xism E Incidents Updated Apr 9, 2024 By Liezel Louw
- Water Into Wetland Incident January 2024 E-Classification XISM Incidents - Updated Apr 9, 2024 By Liezel Louw
- Water Into Wetland Incident January 2024-Pdf Incidents • Updated Apr 9, 2024 By Liezel Louw Incident E-Classification Elders Colliery: Water Into Wetland Incident January 2024
- Action Plans-09042024-26 2023 Audit Action Plans • Updated Apr 11, 2024 By Eva Seko
- Event Details-09042024-38\_Pdf 2023 Audit Action Plans • Updated Apr 11, 2024 By Eva Seko
- Tasks-09042024-31 2023 Audit Action Plans • Updated Apr 11, 2024 By Eva Seko
- Action Plans-09042024-23.Csv E 2023 Audit Action Plans • Updated Apr 11, 2024 By Eva Seko
- EUAIM-ENV-RPT-S02-0014\_1 - Soil And Agricultural Assessment Report (Srk) (1) Specialist Studies - Updated Apr 11, 2024 By Eva Seko Soil And Agricultural Assessment Report For The Elders Colliery Irrigation Project
- Euaim-Env-Rpt-S02-0009\_1 - Terrestrial Biodiversity Baseline Assessment (Srk) (1)

- Terrestrial Biodiversity Baseline Assessment For The Proposed Elders Colliery Irrigation Project
- Elders External WUL Audit 2022.Msg RFI - Updated Mar 23, 2023 By Liezel Louw Elders Colliery External New IWUL Final Audit Report
- DRE Notification Of Commencement Of Construction For Elders Colliery.Msg RFI - Updated Mar 23, 2023 By Liezel Louw
- 570283\_Final Integrated EIA-EMPR\_Elders Colliery\_For DMRE Review\_20211117 Pdf RFI - Updated Mar 23, 2023 By Liezel Louw Final Integrated Environmental Impact Assessment Report And Environmental Management Programme Report For The Proposed Elders Colliery Project
- Euaim-Env-Rpt-To1-0008\_0 - Water Use Assessment (Wsp) (1) Pdf Specialist Studies - Updated Apr 11, 2024 By Eva Seko
- Elders Colliery Water Use Assessment Final.
- Euaim-Env-Pln-S02-0006\_1 - Geochemical Assessment And Amd Plan (Delta H) 08 March 2024 Specialist Studies • Updated Apr 11, 2024 By Eva Seko

- Elders External Environmental Audit 2024-Pptx Presentation - Updated Apr 11, 2024 By Eva Seko
- EIA Pages 145 - 170 Page 145 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- Eia Pages 171 - 195 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 209 - 218 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- Changed Operating Time 2020 Ea And Empr • Updated Apr 9, 2024 By Liezel Louw
- 537942\_Elders EA Memo\_Final\_20200804-Pdf 2020 EA And EMPR - Updated Apr 9, 2024 By Liezel Louw
- 2020-07-29\_093849 Pdf 2020 EA And EMPR - Updated Apr 9, 2024 By Liezel Louw Elders Colliery Environmental Impact Assessment Report And Environmental Management Programme Report
- 2020-07-31\_042516 Pdf 2020 EA And EMPR - Updated Apr 9, 2024 By Liezel Louw Intergrated Environmental Authorisation Issued In Terms Of The National Environmental Management Act, 1998 (Nema) As Amended, The Environmental Impact Assessment (EIA) Regulations, 2014 And The National Environmental Management: Waste Act And Government Notice 921 Of 2013 For Proposed Mining And Associated Infrastructure In Respect Of Portions 3 And 10 Of The Farim Elandsfontein 75 Is, Portions 1 And 2 Of The Farm Geluk 226 Is, Portion 2,3,4,12 And 13 Of The Farm Halfgewonden 190 Is, Portions 0,3,5, And 6 Of The Farm Middelkraal 50 Is, Farm Legdaar 78 Is, Farm Schurvekop 227 Is, Farm Schoon Vlei 52 Is, Kleinfontein 49 Is, Coedehoop 46 Is And Koornfontein 27 Is, Situated In The Magisterial District Of Gert Sibande In Mpumalanga Region
- Ela Page 18-Pdf 2020 EA And EMPR - Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 196 - 208 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Page 118 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Page 119-133 202 EA And EMPR. Updated Apr 9, 2024 By Lieszel Louw
- EIA Pages 134 - 145 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 19 - 74-Pdf 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Page 219 - 233 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 75 - 78 (1) E 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 79 - 80 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Page 81 2020 EA And EMPR • Updated Apr 9, 2024, By Liezel Louw EIA Cover Letter 2020 EA And EMPR - Updated Apr 9, 2024, By Liezel Louw Intergrated Environmental Authorisation Issued In Terms Of The National Environmental Management Act, 1998 (Nema) As Amended, The Environmental Impact Assessment (EIA) Regulations, 2014 And The National Environmental Management: Waste Act And

Government Notice 921 Of 2013 For Proposed Mining And Associated Infrastructure In Respect Of Portions 3 And 10 Of The Farm Elandsfontein 75 Is, Portions 1 And 2 Of The Farm Geluk 226 Is, Portion 2,3,4,12 And 13 Of The Farm Halfgewonden 190 Is, Portions 0,3,5, And 6 Of The Farm Middelkraal 50 Is, Farm Legdaar 78 Is, Farm Schurvekop 227 Is, Farm Schoon Vle! 52 Is, Kleinfontein 49 Is, Goedehoop 46 Is And Koorfontein 27 Is, Situated In The Magisterial District Of Gert Sibande In Mpumalanga Region

- EIA Pages 1 - 17 2020 EA And EMPR • Updated Apr 9, 2024, By Liezel Louw Elders Colliery Environmental Impact Assessment Report And Environmental Management Programme Report
- EIA Pages 103 - 117 Pdf 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 80 - 102 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- EIA Pages 75 - 78 2020 EA And EMPR • Updated Apr 9, 2024 By Liezel Louw
- Changed Operating Time EAs\_ EMPRs - Updated Apr 10, 2024 By Liezel Louw
- EA Thungela Signed EAs\_EMPRs - Updated Apr 9, 2024 By Liezel Louw Intergrated Environmental Authorisation Issued In Terms Of The National Environmental Management Act, 1998 (Nema) As Amended, The Environmental Impact Assessment (EIA) Regulations, 2014 And The National Environmental Management: Waste Act And Government Notice 921 Of 2013 For Proposed Mining And Associated Infrastructure In Respect Of Portions 3 And 10 Of The Farm Elandsfontein 75 Is, Portion 1 And 2 Of The Farm Geluk 226 Is, Portion Re/2, Re/3 Portion Of Portion 4, Portion12/3 And Portion 13/3 Of The Farm Halfgewonden 190 Is, Portions Re- 5/1,6/1,7/1,16/5 And Re- 17/5 Of The Farm Legdaar 78 Is, Portion Of Portion Re, Portion Re3, Portion Re 5, Portion 6/3, 8/3 Of The Farm Middelkraal 50 Is, Portions Re/7, 12/5, 13/5,14/6,22/10.Re/26, Portion 27/26, 28.26 Of The Farm Schurvekop 227 Is And Portion Re Of The Farm Vlakuilen 76 Is Situated In The Magisterial District Of Bethal In Mpumalanga Region
- 570283\_Final Intergrated Eia-Empr\_Elders Colliery\_For Dmre Review\_20211117 EAs\_Emprs - Updated Apr 9. 2024 By Liezel Louw
- Final Integrated Environmental Impact Assessment Report And Environmental Management Programme Report For The Proposed Elders Colliery Project
- Stakeholder Surrounding Community Register Revised Xlsx Oct 2023 Information - Updated Apr 10, 2024 By Eva Seko
- Elders SLP SEC 102 Annexure G - Slp Part 1 Oct 2023 Information • Updated Apr 10, 2024 By Eva Seko
- Elders SLP 2020 Sec 102 Annexure G - Slp Part 2 E Oct 2023 Information • Updated Apr 10, 2024 By Eva Seko
- LCBM Stakeholder Engagement Plan.Msg Oct 2023 Information • Updated Apr 10. 2024 By Eva Seko
- 102eld033-Rs0121-000-1-Rom Stockpile Cleanwater Cut-Off Drain LayoutCLongsection Oct 2023 Information • Updated Apr 10, 2024 By Eva Seko

- 537942\_ Elders EA Notification\_ Note Report\_Long\_20200804. Pdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- ENV Awareness\_Elders\_040523 Wetland C Rehab Plan Pdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw Proposed Mining C Associated Infrastructure At Elders Colliery, In The Mpumalanga Province
- 537942\_ Elders EA Notification Note Report\_Short\_20200804-Pdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Sanitech A Division Of Waco Africa Permit 202324 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Holfontein Landfill Licence Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Khwezela Elders Paperwork Feb 2023 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Dumping Permit 2023-2024 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Response To Application For Sewage Disposal Coastal Hire 2022 Pdf Oct 2023 Information « Updated Oct 11, 2023 By Liezel Louw
- Elders Paperwork For August 2023 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Gpl-00-001 Holfontein Landfill Site Expiry 09 January 2025 Pdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw Certificate Of Registration
- 102eld033-Rs0138-000-A-Rom Haul Road And Guardhouse Clean Water Drains Layout And Long. Section - Sheet 1 Of 2
- 102ELD033-RS0137-000-A-PCD Clean Water Cut-Off Drain Sections Sheet 3 Of 3 Oct 2023 Information • Updated Oct 11, 2023 By Liezel Louw
- Certificate Of Disposal - WBHO - Elders Colliery - Feb 2023 - Stamped-Pdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw Certificate Of Disposal
- 102ELD033-RS0136-000-A-PCD Clean Water Cut-Off Drain Layout And Longitudinal Section - Sheet 2 Of 3 Oct 2023 Information • Updated Oct 11, 2023 By Liezel Louw
- 102eld033-Rs0139-000-A-Rom Haul Road And Guardhouse Clean Water Drains Longitudinal Sections - Sheet 2 Of 2 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Re\_ Elders EA Audit Report Rfimg Oct 2023 Information • Updated Oct 11, 2023 By Liezel Louw
- Certificate Of Disposal - WBHO - Elders Colliery - April 2023 - Stamped Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw Certificate Of Disposal
- 102ELD033-RS0131-000-A-PCD Clean Water Cut-Off Drain Layout And Longitudinal Section - Sheet 1 Of 3 Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw

- 102eld033-Rs0121-000-1-Rom Stockpile Cleanwater Cut-Off Drain LayoutCLongsection
- 102ELD033-RS0125-000-1-OVERBURDEN Stockpile Clean Water Drain Longitudinal Sections (Dwg Name) Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- 102ELD033-RS0124-000-1-OVERBURDEN Stockpile Clean Water Drain Layout And Setting Out Details- (Dwg Name) Oct 2023 Information • Updated Oct 11, 2023 By Liezel Louw
- 102ELD033-RS0123-000-1-BOXCUT Clean Water Drain Layout And Longitudinal Section Oct 2023 Information • Updated Oct 11, 2023 By Liezel Louw
- 102ELD033-RS0122-000-2-MIA Clean Water Drain Layout, Long Section And Setting Out Detailpdf Oct 2023 Information - Updated Oct 11, 2023 By Liezel Louw
- Final Elders Monthly ECO Report\_April 23 Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- Elders Emergency Response Plan - 2023 08 21-Pptx Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw
- Elders Colliery Docx Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw
- Environmental Management Compliance Monitoring Report\_Elders Colliery Underground Access Project\_February 2023 Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- Water Quality Monitoring Programme For Elders Colliery Msg Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- TBC\_AIP MANAGEMENT PLAN\_SRK\_ELDERS\_SUBMIT 16032023 Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- SRK\_ELDERS\_SOIL ASSESSMENT\_SUBMIT16032023 Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw
- Environmental Management Compliance Monitoring Report Elders Colliery Underground Access Project March 2023 Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- Elders Colliery Wetland And Land Rehabilitation And Management Plan.Msg Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw

- Ekolnfo CC Elders Alien Invasive Species Control Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw Proposal And Estimate: Alien Invasive Control - Elders Colliery
- 2022 Internal Elders Wul Audit Report.Msg Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw Elders Colliery Internal Wul Final Audit Report 23.03.23 Signed
- Environmental Management Compliance Monitoring \_Elders Colliery Underground Access Project) January 2023 Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw Construction Of The Proposed Elders Colliery And Associated Infrastructure, Mpumalanga
- Elders External WUL Audit 2022.Msg Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw
- Elders Colliery Water Monitoring Results For Q1 2023.Msg Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- 102ELD033-RS0025-000-0-TEMPORARY Cut Off Drain 3 Layout And Setting Out Co-Ordinates For Construction
- Re\_ Elders Groundwater Monitoring Programme.Msg RFI - Updated Mar 23, 2023 By Liezel Louw
- Comprehensive Water Quality Monitoring Programme For Elders Colliery 2023 RFI • Updated Mar 23, 2023 By Liezel Louw A Comprehensive Groundwater Quality Monitoring Programme For Elders Colliery
- Changed Operating Time RFL - Updated Mar 23, 2023 By Liezel Louw

- 102ELD033-RS0025-000-0-TEMPORARY Cut Off Drain 3 Layout And Setting Out Co-Ordinates For Construction (1)-Pdf Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- 102ELD033-RS0018-000-1-TEMPORARY Cut Off Drains 12 And 3 Layout Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- 102ELD033-RS0014-000-0-TEMPORARY PCD Cut Off Drain - Layout, Setting Out And Longitudinal Section Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- 102ELD033-RS0023-000-0-TEMPORARY Cut Off Drain 1 Layout And Setting Out Co-Ordinates For Construction Oct 2023 Information • Updated Oct 10, 2023 By Liezel Louw
- 06.06.2023\_Draft Legal Note Elders Dust Suppression Water Final Oct 2023 Information - Updated Oct 10, 2023 By Liezel Louw
- ELD-A-2023 Elders Biomonitoring Jan 2023 Water Monitoring - Updated Mar 24, 2023 By Liezel Louw
- Elders - Oct 22.Msg Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- SW Final-October2022.Xlsx Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- GW Final-October2022.Xlsx Water Monitoring - Updated Mar 23, 2023 By Liezel Louw
- SW Final-November2022.Xlsx Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- GW Final-November2022.Xlsx Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- Thungela Elders Data Reports - Jan 23.Msg Water Monitoring - Updated Mar 23, 2023 By Liezel Louw
- Construction WAT\_Jul22 To Feb23.Xlsx Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- Thungela Elders Data Reports - Feb23.Msg Water Monitoring • Updated Mar 23, 2023 By Liezel Louw
- EUAIM-ENV-PRO-T01-0010\_0 - Thungela Environmental Snake Bites Procedure.Pot Procedures - Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0008\_0 - Thungela Environmental Alien And Invasive Management Procedure Procedures - Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0009\_0 - Thungela Environmental Fire Prevention Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0007\_0 - Thungela Environmental Stormwater Erosion C Sediment Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0002\_0 - Thungela Environmental Spill Prevention And Spill Handling Procedure Procedures - Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0003\_0 - Thungela Environmental Vegetation Clearing Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-T01-0001\_0 - Thungela Environmental Monitoring Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux

- EUAIM-ENV-PRO-TO1-0004\_0 - Thungela Environmental Topsoil Handling And Management Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- 0295-0815-CED-S01-0001\_C - Environmental And Cadastral - Block Plan MPDF (5) Pdf RFI • Updated Mar 23, 2023 By Liezel Louw
- Name Change Notification Authority Correspondence Fyl.Msg RFI - Updated Mar 23, 2023 By Liezel Louw
- EUAIM-ENV-PRO-TO1-0005\_1 - Waste Management Procedure (1) Pdf Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- EUAIM-ENV-PRO-TO1-0006\_0 - Thungela Environmental Dust Control Pdf Management Procedure Procedures • Updated Mar 23, 2023 By Gustav Nic Le Roux
- Water Quality Monitoring Programme For Elders Colliery.Msg RFI - Updated Mar 23, 2023 By Liezel Louw
- Upper Olifants CmF Draft Minutes Of Meeting 15 September 2022 Pdf RFI - Updated Mar 23 By L. Louw
- Upper Olifants Attendance Register 15 September 2022 Pdf RFI - Updated Mar 23, 2023 By Liezel Louw
- 570283\_ELDERS\_WULA\_IWWMP\_FINAL\_20220829 RFI - Updated Mar 23, 2023, By Liezel Louw Thungela Anglo American - Inyosi Coal (Pty) Ltd Elders Colliery Integrated Water And Waste Management Plan In Support Of The Water Use Licence Application
- EAR Proof Of Submissions RFI - Updated Mar 23, 2023 By Liezel Louw
- Thungela Resources (PR) Limited: Zibalo (Underground) Colliery - 2022 Environmental Audit Report
- Elders Colliery Internal Iwul Final Audit Report 23.03.23 Signed RFI - Updated Mar 23, 2023 By Liezel Louw Elders Colliery Final Report Integrated Water Use License (IWUL) Internal Audit Report
- Elders Colliery External New IWUL Final Audit Report RFI - Updated Mar 23, 2023 By Liezel Louw Elders Colliery Integrated Water Use License (Iwul) External Audit Report Final
- Elders Colliery Reg 34 EMPR Final Audit Report RFI - Updated Mar 23, 2023 By Liezel Louw Elders Colliery Final Environmental Audit Report
- Re\_ Elders Groundwater Monitoring Programme.Msg RFI - Updated Mar 23, 2023 By Liezel Louw
- Comprehensive Water Quality Monitoring Programme For Elders Colliery 2023 RFI • Updated Mar 23, 2023 By Liezel Louw A Comprehensive Groundwater Quality Monitoring Programme For Elders Colliery

### **3.2. SITE VERIFICATION**

The site assessment was conducted on 3 April 2025 by Tanja Bekker (NTC), Mary-Anne Carter (NTC), Eva Seko (Elders Colliery), and Caroline Perpermans (Pinsent Masons). During the site assessment, additional documents were collated, and information was verified, Elders Colliery personnel were interviewed and the following areas in were visited:

- Overburden stockpile
- ROM stockpile and truck loading area
- Topsoil Stockpiles
- Laydown areas
- Conveyors
- Boxcut
- Mining Infrastructure Area
- PCD
- Water treatment plant.

### **3.3. ASSESSMENT METHODOLOGY**

NTC assessed each of the EA and EMP conditions using the criteria provided in Table 2. Only conditions in the non-compliance category were given recommendations for rectification. The audit approach was guided by the requirements of the ISO 19011:2018 Guidelines for Auditing Management Systems. The audit scope was based on Section 34 and Appendix 7 of the EIA Regulations, as amended which defines the key objectives of an audit.

**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.

#### **4. AUDIT RESULT**

---

This section is aimed at highlighting the non-compliances identified during the external environmental audit of the current Environmental Authorisations and Environmental Management Programmes relevant to Elders Colliery. The full audit details are provided in Table 3, Table 4, Table 5 and Table 6. NTC has included numbering of the conditions to allow for easier cross referencing within this report, but this numbering system is not always representative of the EA/ EMPR Section references or numbering.

**TABLE 3. ENVIRONMENTAL AUTHORISATION FOR ELDERS COLLIERY: MPUMALANGA PROVINCE (REF NO: 30/5/1121312111 (10117) EM DATED 29 JULY 2020**

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8	CONDITIONS		
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.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
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	Elders Colliery ensures agents, subcontractors, and employees undergo induction training in environmental management before contract commencement. The induction training presentation was reviewed by the auditors in "Proposed Mining & Associated Infrastructure at Elders Colliery in the Mpumalanga Province" (11 March 2024), compiled by Sibbs Alluring, and covers environmental good practice and topics related to the EA and EMPr conditions.

8.1.3	<p>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.</p>	T/N	<p>The condition is noted and accepted by Thungela Elders Colliery. No change to the authorisation was undertaken during the audit period (April 2024 - March 2025).</p> <p>Subsequent to the issuing of this Environmental Authorisation in 2021, Thungela proposed changes to the project description which included a change in mine plan, block plan, an additional transport method for mined coal and an interim coal loading area. Due to the proposed project description changes, it was determined that in terms of the NEMA EIA Regulation that an Integrated Scoping and Environmental Impact Report (S&amp;EIR) would be required as well as a Regulation 31 Amendment . The application was submitted to the DMRE in December 2020 for both processes and the Environmental Authorisation (MP) 30/5/1121312111(10117) EM was granted in on 08 June 2023.</p>
8.1.4	<p>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 this department, within fourteen (14) days of the above specified change.</p>	T/N	<p>The condition is noted and accepted by Thungela Elders Colliery. No changes to the applicant's details, including the name of the responsible person, physical or postal address and/or telephonic details, or transfer of the authorisation occurred during the audit period (April 2024 - March 2025).</p>
8.1.5	<p>A copy of this authorisation must be kept on site. The authorisation must be produced to any Governmental official(s) who may requests to see it for inspection purposes and must be made available to the contractor(s)/ subcontractor(s) authorised</p>	C	<p>A copy of the EA and EMPr was available at Elders Colliery site during the site inspection and forms part of the contract with contractors.</p>

	to undertake to undertake work at the property.		
8.1.6	This authorisation does not negate the holder of the authorisation's responsible to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.1.7	After an appeal period has been expired and no good course to extent the appeal period has been submitted in accordance with Chapter 2 of the National Appeal Regulations of 2014, a thirty (30) day-written notice must be given to the department that the activity will commence. Commencement for purpose for the purpose of this condition includes site preparation. 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 (April 2024 - March 2025).
8.2	SPECIFIC CONDITIONS		
8.2.1	Commissioning of the Activity		

8.2.1.1	<p>This authorisation is hereby solely granted for the mining of coal using underground method (board and pillar) with the following box cut, access road, powerlines, pipelines, ventilation shafts, bulk storage for fuel, fencing, topsoil stockpile, overburden stockpile, pollution control dam, waste and scrap yard, sewage treatment plant, water treatment plant, wash bay, substation, storage of explosive, primary crusher, conveyer belt and water management infrastructure on portions 3 and 10 of the farm Elandsfontein 75 IS, portions 1 and 2 of the farm Geluk 226 IS, portion 2,3,4,12 and 13 of the farm Halfgewonden 190 IS, portions 0,3,5, and 6 of the farm Middelkraal 50 IS, farm Legdaar 78 IS, farm Schurvekop 227 IS, farm Schoon Vlei 52 IS, Kleinfontein 49 IS, Goedehoop 46 IS and Koorfontein 27 IS. Magisterial District of Gert Sibande, Mpumalanga Region.</p>	C	<p>During the site inspection, no deviations from the authorised activities or properties were noted.</p>
8.2.1.2	<p>The activities may not commence without the necessary permits/licenses/approvals and/or service agreements, where it is relevant, from or with the relevant regulatory authorities whether national, provincial or local.</p>	T/N	<p>The condition is noted and accepted by Thungela Elders Colliery.</p>
8.2.1.3	<p>The applicant must apply the principle of best practicable environmental option for all technologies used/ implemented during mining.</p>	T/N	<ul style="list-style-type: none"> <li>• The condition is noted and accepted by Thungela Elders Colliery.</li> </ul>
<p>8.2.1.4 Pre-Construction Phase</p>			

a)	The applicant must appoint an independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMP and EA (see 8.2.2. Management of the activity for more details).	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
b)	The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Plan and Environmental Authorisation prior to the mining activities.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
c)	All pre-construction phase mitigation measures as outlined in the Environmental Management Programme (EMP) attached in Environmental Impact Assessment report must be adhered to at all times.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
d)	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
e)	Appropriate notification sign must be erected at the mining area, warning the public (residents, visitors etc.) about the hazard around the mining area and presence of heavy vehicles and machinery.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
f)	Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of stormwater runoff.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).

g)	Construction areas (e.g., material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
h)	If any soil contamination is noted at any phase of the proposed activity (ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this department must be informed in this regard.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
8.2.1.5 Access Roads and Traffic Impact			
a)	Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads.	C	Signage is installed in both traffic directions on the R35 at the entrance turn to Elders Colliery. The signage warns motorists of the movement of construction vehicles and that there is an obstruction on the Elders Mine side of the road.
b)	b) Access roads must be well maintained throughout the mining operation.	C	During the site inspection, the access roads were observed to be in good condition.

8.2.1.6	Air Quality Management	C	<p>The "<i>Thungela Dust Control Management</i>" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) outlines the procedure for identifying dust sources, conducting dust monitoring and implementing dust control measures.</p> <p>Monthly "<i>Gravimetric Dust Fallout Monitoring Report</i>" (Doc No. 22-1734-ECOI), compiled by Eco Elementum and Engineering (Pty) Ltd from March to December 2024 provides data from eight dust fallout monitoring gauges installed around Elders Colliery. The "Neels Farm 1" gauge (located 6 km northwest of Elders Colliery) exceeded the residential limit (600 mg/m<sup>2</sup>/day) in May 2024 (636 mg/m<sup>2</sup>/day) and December 2024 (1119 mg/m<sup>2</sup>/day). The report attributes these exceedances to dust generated from the adjacent gravel road and farm. Furthermore, the National Dust Control Regulations (No. R. 827 of 1 November 2013), permits dust fallout to exceed the limit twice annually, however, not in consecutive months. Finally, the report recommends that dust suppression measures be continued at Elders Colliery.</p> <p>The monthly ambient air quality reports, "<i>Thungela Resource (Pty) Ltd Elders Air Quality Monitoring (AQM) Report</i>" (Doc No. 22-1734), compiled monthly by Eco Elementum and Engineering (Pty) Ltd from January to December 2024 were reviewed during the audit. The reports provide data from the Element Air Unit "Node 1" (located about 2.5 km south west of Elders Colliery) which monitors wind speed, wind direction, temperature, relative humidity, precipitation, PM10 and PM2.5. According to the reports, no site-related PM2.5 or PM10 exceedances were recorded during the audit period (April 2024 - March 2025).</p>
a)	<p>Proper measures must be put in place to suppress dust in order to minimise nuisance conditions.</p>		

b)	A speed restriction of 40km/h must be enforced and monitored on site for all mining vehicles.	C	The maximum speed limit signage of 40km/h was observed during the site inspection and no transgression was noted.
8.2.1.7 Proliferation of Alien Species			
a)	All mining/ construction equipment and vehicles must be cleaned before entering and leaving the site to reduce the chances of spreading weeds and invasive species.	C	At the time of the audit, washing/ cleaning of mining/underground vehicles is performed at the MIA Workshop.
8.2.1.8 Noise			
a)	Mining/ construction activity must be limited to normal working hours (07h00-17h00).	C	An email dated 9 October 2025 from Ms. Maduka of the Department of Mineral Resources and Energy (DMRE) to Ms. Daphney of Thungela confirms that the specific licence condition cannot be amended. However, the DMRE advised that the mine may apply to the DMRE Occupational Health Section should an amendment be required. Furthermore, the mine currently holds permission from the DMRE to conduct work seven (7) days a week, including weekends, in accordance with the approved operational schedule.
b)	Mining vehicles must be fitted with standard silencers prior to beginning of construction.	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit. The Action Plan included a task for installing silencers on vehicles (Action Plan ID: AP 00865783) which is indicated as completed on 23/02/24 as well as a task to conduct noise monitoring during the construction phase at sensitive receptors (Action Plan ID:00865738) which is due by 28/06/2024.

8.2.1.9	Erosion Control Measures
---------	--------------------------

a)	All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	C	No soil compaction was noted during the site inspection.
b)	Any erosion channel developed during mining/ construction period or during vegetation establishment must be restored to a proper condition.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.1.10	Excavation Activities		
a)	Topsoil must be stripped and stockpiled prior to excavation in a designated area.	C	Topsoil is stockpiled on the western side of site parallel to the R35 and extends from the overburden dump toward the laydown area and conveyor.
b)	Under no circumstances should material stockpiles be disposed of outside the boundary of the mining area.	C	All stockpiles observed during the audit inspection were within the site boundary and on the approved area.
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 temporary dumping and littering of waste are allowed on site.	C	During the site inspection, general waste was stored in colour coded, labelled wheelie bins and 6m3 waste skips. No dumping or littering was observed.
b)	No waste must be disposed of through burying and burning	C	No evidence of waste burying or burning was observed during the site inspection.

c)	All hazardous waste must be disposed of at an official registered site or be removed by registered hazardous waste contractors.	C	Waste manifests were provided during the audit indicating that hazardous waste is disposed of at Holfontein Hazardous Waste Disposal Facility, which is duly authorised.
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	A copy of the Emergency Response plan was reviewed during the audit and included actions to be taken in the event of a fire or spillages. Pollution incidents and spillages are managed in accordance with the: "Thungela Environmental Spill Prevention and Handling Procedure" (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides requirements for spill prevention and the process for spill management.
8.2.1.12 Surface and Groundwater Contamination			
a)	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	The Mining Infrastructure Area (MIA) Workshop area is concreted and contaminated effluent from the workshop is channeled via a V-Drain to the oil separator. The two 46 m <sup>3</sup> Diesel Tanks were observed to be adequately bunded and spill kits were available.
b)	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	T/N	The condition is noted and accepted by Thungela Elders Colliery. There were no spillages during the audit period.

c)	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.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
d)	Untreated sewage water must not be discharged directly into the natural environment.	C	During the site inspection, no concerns regarding the discharge of untreated sewage water into the natural environment were noted.
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	Serviced fire extinguishers were noted throughout the site during the site inspection.
b)	Workers must be adequately trained in the handling of firefighting equipment's.	C	Thungela Elder's personnel advised the auditors that trained firefighters are appointed as fire marshals at the site.
c)	Open fires must strictly be prohibited.	C	Elders Colliery's fire safety requirements were communicated to the auditors during the site induction and the induction presentation " <i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i> " (11 March 2024), compiled by Sibbs Alluring was made available. No evidence of open fires was noted during the site inspection.
d)	Smoking must be prohibited in the vicinity of flammable substances.	C	Demarcated smoking areas were observed during the audit which were located away from-d flammable storage areas.
8.2.1.14	Stormwater Management		

a)	Stormwater management plan must be developed, and implemented on site.	C	Civil drawings for the stormwater water drains at the PCD (DRG No. EUAIM-CED-DRW-S01-0014; Rev. 00), Boxcut (DRG No. EUAIM-CED-DRW-S01-0123; Rev. 01), Overburden Stockpile (DRG No. EUAIM-CED-DRW-S01-0124; Rev. 01), MIA (DRG No. EUAIM-CED-DRW-S01-0122; Rev. 02) and ROM Stockpile (DRG No. EUAIM-CED-DRW-S01-0121; Rev. 021) were availed to the auditors. During the site inspection, the clean and dirty stormwater channels and infrastructure were operational.
8.2.1.15 Safety			

a)	Potentially hazardous area must be demarcated with danger tape.	C	Barrier safety nets (yellow and orange) were observed around site to demarcate potentially hazardous areas 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	Restriction and safety signage were erected from the entrance gate and within the project footprint.
8.2.1.16 Emergency Response Plan			
a)	An Emergency Response Plan should be available for accidental spills and fire fighting during both construction and operation of the project.	C	A copy of the Emergency Response plan was reviewed during the audit and included actions to be taken in the event of a fire or spillages. Additionally, the spill management procedure: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: ENV-PRO-T01-0002, Version No. 0) and fire management procedure: " <i>Thungela Fire Management Procedure</i> " (Doc Ref: ENV-PRO-T01-0009, Version No 0) was also made available during the audit.

b)	In the event of emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.	T/N	The condition is noted and accepted by Thungela Elders Colliery. No reportable incidents occurred during the audit period (April 2024 - March 2025).
c)	All significant pollution incidents must be reported to this department within forty-eight (48) hours of occurrences.	T/N	The condition is noted and accepted by Thungela Elders Colliery. No reportable incidents occurred during the audit period (April 2024 - March 2025).
8.2.1.17	Compliance with other Legislation		
a)	a) The National Water Act, 1998 (Act 36 of 1998), with particular reference to the sections pertaining to mining in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
b)	The Environmental Conservation Act, 1989 (Act 73 of 1989) with particular reference to the requirements of section 20 of the above-mentioned Act	T/N	The condition is noted and accepted by Thungela Elders Colliery.
c)	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 prospecting activities, into the atmosphere.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

d)	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation,].	T/N	The condition is noted and accepted by Thungela Elders Colliery.
e)	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.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
f)	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 100 m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.	C	The site employs Health and Safety personnel to specifically monitor and ensure the site complies with the Mine Health and Safety Act (Act 29 of 1996).

g)	The National Environmental Management Act,1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.	C	During the audit it was confirmed that the appropriate necessary measures will be taken to ensure that Elders complies with the requirements stipulated in the legislation listed in condition 8.2.1.17. Various specialist studies were conducted due to the key environmental attributes that are found in the study area, these were attached as appendices and referenced in the EIA, EMPr and during environmental authorisation application process. These existing specialist studies (including baseline environment, impact assessment, mitigation measures and monitoring) are still relevant.
h)	Firebreaks should be established in terms of the requirements and conditions of the National Veld and Forest Fires Act, 1998 (Act No. 101 of 1998).	C	The " <i>Thungela Fire Management Procedure</i> " (Doc No. EUAIM-ENV-PRO-T01-0009, dated 24 October 2022) provides the requirements for preparing and maintaining firebreaks. During the site inspection, fire breaks were observed at the area adjacent to the PCD boundary fence.
i)	All provisions of the Occupational Health and Safety Act, 1993 (Act No,85 of 1993) and any other applicable legislation must be adhered to by the holder of this Authorisation.	C	The site employs Occupational Health and Safety personnel to specifically monitor and ensure the site complies with the Occupational Health and Safety Act, 1993 (Act No,85 of 1993).
8.2.1.18 Liability of the holder of this Authorisation			
a)	The competent authority shall not be held responsible for any damages or losses suffered by the holder or his/her successor in title in any instance where mining/ construction or operation subsequent to construction are to be 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 document emanating from this authorisation. The holder shall be responsible for all the costs necessary to comply with the above condition unless otherwise specified.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

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 parties concerned.	T/N	The condition has been noted and accepted by Thungela Elders Colliery. During the audit session, the auditor was informed that no complaints were received from the public.
c)	The contractor must ensure that serviceable ablution facilities are available for employees. It is the responsibility of the holder of the authorisation to see to it that this condition is adhered to.	C	During the site inspection, portable chemical toilets were observed at the Water Treatment Plant. Safe disposal certificates were provided for the removal of sewage from the site.
8.2.2	Management of the Activity		
8.2.2.1	A copy of an Environmental Authorisation and EMP must always be available on site so as to monitor compliance with conditions outlined in both the documents. Both documents must be used as on-site reference document during the life of mine.	C	A copy of this Environmental Authorisation is available at the environmental officer's file which is kept located on site. The auditor was provided with the file.
8.2.2.2	The Environmental Management Plan (EMP) prepared by SRK Consulting (attached to the EIA Report) must be adhered to during the life of the mine.	C	Thungela Elder's Colliery appoints External Environmental Auditors to conduct annual audits of their compliance with the conditions of the EMP. An assessment as to compliance with the EMP is set out below in Table 2, which indicates that Thungela Elders Colliery generally complies with the obligations set out therein.
8.2.2.3	All duties and responsibilities as outlined in the EMP attached are binding throughout the life of the mine.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.2.4	Any proposed amendments to the EMP (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 amended and adhered to.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

<b>8.2.3</b>	<b>Appointment of Environmental Control Officer</b>		
a)	An Environmental Control Officer must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Environmental Authorisation and Environmental Management Plan, prior to any commencement of mining activities on site.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025). The mine commenced with the operational phase in March 2024, going into full operational phase in October 2024.
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	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
c)	The ECO must also monitor the implementation of specific elements of the Environmental Management Plan by contractors.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
d)	All duties and responsibilities as outlined in the EMP attached are binding throughout the life of mine.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
<b>8.2.4</b>	<b>Site Closure and Decommissioning</b>		
8.2.4.1	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 EMP or EMPr.	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).
8.2.4.2	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 2002), as amended.	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).
8.2.4.3	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	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).

	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.		
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 this authorisation.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.3.2	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 mine is put into practice.	C	Elders Colliery uses various techniques to monitor and manage their environmental performance, including ongoing monitoring of ground and surface water quality, aquatic ecosystems, air quality, waste management and soil management. Environmental Procedures have been developed to outline requirements, monitoring methods and management interventions for water quality, waste, stormwater, erosion, sedimentation, topsoil management, vegetation clearing, spill management, dust control and fire prevention.
8.4	RECORDING AND REPORTING TO THE DEPARTMENT		
8.4.1	The authorisation holder must submit Annual Environmental Audit Reports during the operation of the activity, unless otherwise requested by the department	C	The Annual Environmental Audit Reports titled, " <i>Thungela Elders Colliery: Performance Assessment Report for the Environmental External Audit 2023/2024</i> " (Doc No. ENV-TR-EL-002 ELDERS, dated ), compiled by NTC Group (Pty) Ltd was submitted to the DMRE on 09 December 2024, as verified in an email to DMRE Official (Ms. M. Maduka), titled: " <i>Submission of the External Environmental PAR for Thungela Elders Colliery (Annual Period 2023 – 2024)</i> ".
8.4.2	The audit report must convey the following:		

8.4.3	The date in which the audit was carried out.	C	The " <i>Thungela Elders Colliery: Performance Assessment Report for the Environmental External Audit 2023/ 2024</i> " (Doc No. ENV-TR-EL-002 ELDERS, dated ), compiled by NTC Group (Pty) Ltd indicates that the audit was conducted from 09 - 10 April 2024.
-------	--	---	--

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8.4.4	The outcome of the audit, in relation to the conditions stipulated in the environmental authorization and the approved EMPr as well as the actions taken to mitigate environmental impacts on site.	C	The " <i>Thungela Elders Colliery: Performance Assessment Report for the Environmental External Audit 2023/ 2024</i> " (Doc No. ENV-TR-EL-002 ELDERS, dated ), compiled by NTC Group (Pty) Ltd assesses Elders Colliery's compliance with the conditions of the EA and EMPr. The report includes a summary of the non-compliances raised as well as an action plan to rectify the non-compliances.
8.4.5	Records of monitoring and for 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 Thungela Elders Colliery.
8.4.6	Records relating to compliance and non-compliance with the conditions of this authorisation 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 compliance will further be monitored through complaints received from the public.	C	Records relating to compliance and non-compliance are kept in good order.

8.4.7	All records relating to the implementation of the Environmental Management Programme must be kept in the office where it is safe and can be retrievable.	C	Records relating to compliance and non-compliance are kept in good order.
8.5	NON-COMPLIANCE		
8.5.1	In the event of non-compliance by any contractor during the mining/construction of the authorised activity, the holder of this authorisation will be liable.	T/N	The condition is noted and accepted by Thungela Elders 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 Thungela Elders 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 Thungela Elders Colliery.
8.5.4	Noncompliance 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 of such offence, may result in Section 49(a) being enforced.	C	The condition is noted and accepted by Thungela Elders Colliery.
9	APPEAL OF AUTHORISATION		
9.1	The holder of the authorisation must notify every registered interested and affected party, in writing and within fourteen (14) days, of receiving the department's decision.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
9.2	THE NOTIFICATION REFERRED TO IN 9.1 MUST -		
9.2.1	Specify the date on which the authorisation was issued.	N/A	This condition falls outside of the scope of the audit period (April 2024 -

			March 2025).
9.2.2	Inform the registered interested and affected parties of the appeal procedure provided for in Chapter 2 of the National Appeal Regulations of 2014.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
9.2.3	Advise the interested and affected parties that a copy of the authorisation and reasons for the decision will be furnished on request.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
9.2.4	An appeal against the decision must be lodged in terms of Chapter 2 of the National Appeal Regulations of 2014.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).

**TABLE 4: ENVIRONMENTAL MANAGEMENT PROGRAM FOR ELDERS COLLIERY APPROVED IN THE INTEGRATED EA (MP) 30/5/1121312111(10117) EM DATED 26 JULY 2020**

EMPr Report Title: SRK Consulting (January 2016) Elder Colliery Environmental Impact Assessment Report and Environmental Management Programme Report. Report No. 484436. (pp 196 - 208).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1	AIR QUALITY		
	Box-cut and Associated Infrastructure		
1.1	Water sprays will results in 50% control efficiency	C	While no water spraying was observed during the audit, the water filling point for water trucks was observed during the audit at the PCD area. A procedure for dust monitoring was provided during the audit" "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) and provides the identification of dust sources and required management interventions as well as dust monitoring requirements. The dust fallout reports were reviewed during the audit and were found to be compliant for the audit period. No issues related to dust were noted during the site inspection.
1.2	Water sprays on unpaved roads, stockpiles and material handling points; this will results in 50% control efficiency	C	The water filling point for water trucks was observed during the audit at the PCD area. A procedure for dust monitoring was provided during the audit" "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) and provides the identification of dust sources and required management interventions as well as dust monitoring requirements. The dust fallout reports were reviewed during the audit and were found to be compliant for the audit period. No issues related to dust were noted during the site inspection.
1.3	Enclose the crusher and fit with a dust extraction system.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit, the crusher was not yet constructed.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.4	Traffic control done through restriction of traffic volumes on roads and vehicle speeds.	C	There is controlled access to the site and speed limit signage has been installed. The maximum speed of 40km/h was observed during the site inspection.
1.5	Use water sprays on all stockpiles with special attention given to active stockpiles.	C	While no water spraying was observed during the audit, the water filling point for water trucks was observed during the audit at the PCD area. A procedure for dust monitoring was provided during the audit "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) and provides the identification of dust sources and required management interventions as well as dust monitoring requirements. The dust fallout reports were reviewed during the audit and were found to be compliant for the audit period. No issues related to dust were noted during the site inspection.
1.6	Long-term stockpiles should be vegetated or turfed.	C	Long-term stockpiles have been naturally re-vegetated.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1.7	Net screens with fine mist sprays around stockpiles areas.	NC	<p>Net screen and/ or fine mist sprays are not used for dust management of stockpiles.</p> <p>Elders Colliery reported that reseeded of stockpiles and vegetation establishment is undertaken as a management intervention to prevent dust emissions. During the site inspection, no concerns regarding dust emissions in relation to stockpiles were observed.</p>
1.8	Adhere to specified design (a roof and one side covered). The conveyor covering should be in the direction where most sensitive receptors are located (westerly direction of the mine).	C	During the site inspection, the conveyor was observed to be roofed and partially covering on the west facing side.
2	BIODIVERSITY		
2.1	Box cut and Associated Infrastructure		
2.1.1	Removal of vegetation should be restricted to the relevant infrastructure footprints only.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). Elders Colliery is operational, and no vegetation removal was undertaken during the audit period.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.1.2	Topsoil should be stored separately to be used in rehabilitation and landscaping	C	During the site inspection, the topsoil stockpiles were observed at the approved localities, along the western site boundary (adjacent to the R36) and at the area around the boxcut.
2.1.3	No off-road driving into the natural remaining vegetation should be allowed especially by heavy machinery.	C	During the site inspection, no vehicle tracks were observed in natural areas or outside of the approved footprint, including the wetland adjacent to the

			PCD boundary fence.
2.1.4	The development of erosion gullies will be monitored and managed	T/N	The condition is noted and accepted by Thungela Elders Colliery. During the site inspection, there were no erosion gullies observed.
2.1.5	Prevent any and all effluent from the mining activities of entering the wetland habitat.	C	No surface or groundwater pollution was observed during the audit period. As such, there was no requirement to conduct additional investigations or implement further monitoring, pollution prevention, or remediation measures. The Licensee remains committed to promptly addressing any potential pollution incidents in accordance with the licence conditions and to the satisfaction of the Responsible Authority.
2.1.6	Prevent all open fires, provide fire-safe zones, facilities and suitable fire control measures	C	Elders Colliery's fire safety requirements were communicated to the auditors during the site induction and the induction presentation " <i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i> " (11 March 2024), compiled by Sibbs Alluring was made available. During the site inspection, fire breaks were noted at the area adjacent to the PCD boundary fence; the emergency assembly points were clearly demarcated and an adequate supply of serviced fire extinguishers was observed in the areas visited. The " <i>Thungela Fire Management Procedure</i> " (Doc No. EUAIM-ENV-PRO-T01-0009, dated 24 October 2022) provides requirements for preparing and maintaining firebreaks and the formation of fire teams.
2.1.7	Use of branches of trees, shrubs or any vegetation for fire making purposes is strictly prohibited.	C	No open fires are allowed on the mine, and there is no use of trees, shrubs or any vegetation for fire making.
2.1.8	Provide sufficient on-site ablution, sanitation and waste management and hazardous materials management facilities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
2.1.9	The use of the natural veld for ablution purposes shall not be permitted under any circumstances.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). The site is no longer in construction, and the operations commenced in March 2024.

2.1.10	Dust control on all roads should be prioritised.	C	Elders Colliery employs water bowsers for dust control on the internal access roads, as verified during the site inspection. No concerns relating to dust emission was noted.
2.1.11	A road management plan should be compiled prior to commencement of construction activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.2.1	Remaining areas of natural vegetation within the box-cut and associated infrastructure area will be inspected for the presence of species of concern during the optimal time prior to construction by a registered and experienced biodiversity team. This might require a number of visits over a number of months.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
2.2.2	Employees at the mine should be educated about the environment, the species of concern present and how to deal with them. Ignorance paves the way for prejudice.	C	Environmental awareness and species of concern is communicated to employees and contractors during site induction, as verified in the induction presentation " <i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i> " (11 March 2024), compiled by Sibbs Alluring.
2.2.3	Employees will not be allowed to harvest, utilise, manage or control any natural resource (water, soil, flora, fauna) unless it is done within the framework of a biodiversity action plan.	C	Employees are aware during induction that they are not permitted to make use <b>of</b> any resources found on site and that environmental protection is prioritised at the site.
2.2.4	No alien invasive plant or feral animal (domestic or wild) should be introduced into the area or be allowed to establish or spread in the area. Alien invasive or feral species already in the areas should be managed and controlled within the framework of a biodiversity action plan.	C	"Thungela Elder's Colliery appointed the Biodiversity Diversity Company to develop an Alien Invasive Plant (AIP) Management Plan: ""Alien Invasive Plant Management Plan for the Elders Colliery identified ten Category 1(b) AIP species, which legally require control. The most invaded areas were found to be along the fence lines, with potential invasion into the project area. Thungela appointed Ekoinfo cc and Associates for AIP eradication, which commenced in October 2023 and was completed in February 2024.The report issued: ""Elders Colliery Alien Invasive Control for the Period 2023/ 2024 Growing Season"" dated March 2024 indicated successful removal of AIPs and recommended ongoing eradication be implemented to prevent reestablishment. "
2.2.5	Only regionally, biome specific indigenous species should be used in the landscaping and rehabilitation. The seed and seedlings can be obtained by effectively managing the topsoil prior to construction. A	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

	<p>professionally registered biodiversity team consisting of pedologists, botanists and zoologists should assist with the rehabilitation and landscaping plans.</p>		
<p>2.2.6</p>	<p>No animal may be hunted, trapped, snared or captured for any purpose whatsoever. Fences and boundaries should be patrolled weekly in order to locate and remove snares and traps. Fences should be made visible, especially for flying fauna, specifically avifauna.</p>	<p>C</p>	<p>Thungela Elders prohibits animal hunting, trapping, snaring and this is communicated to employees and contractors during the site induction, as verified in the induction presentation "<i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i>" (11 March 2024), compiled by Sibbs Alluring. Fencing was noted around the site and the site boundary and fencing is inspected during daily security patrols.</p>

		<b>STATUS</b>	<b>AUDIT OBSERVATIONS (FINDINGS)</b>
<b>3</b>	<b>GROUNDWATER</b>		
<b>3.1</b>	<b>Overburden Stockpiles</b>		
3.1.1	Verify AMD generation potential through sampling and analyses of actual overburden excavated.	C	The Elders Colliery Geochemical Assessment and AMD Plan (2023) was provided to the auditor. ABA and leach tests of two (2) roof, two (2) floor samples of the No. 2 and No. 4 seam and one (1) composited overburden sample were taken for this study. Results showed that samples taken from these areas were classified as potentially long-term acid generating.
3.1.2	Place the overburden on a properly prepared and compacted footprint. This will optimize lateral drainage of percolated water and minimize infiltration into the subsurface.	C	The overburden stockpile was observed to be placed on a designated compacted area. During the site inspection, it was noted that southern side of the facility is draining to the dirty water channels.
3.1.3	A civil engineering design, incorporating footprint preparation, leachate control and stormwater management, must nevertheless be done for the overburden stockpile and submitted to DWS for approval.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
<b>3.2</b>	<b>Boxcut and Associated Infrastructure</b>		
3.2.1	The cone of depression can be minimized by sealing the box-cut walls with shotcrete/gunite which will allow groundwater levels to re-establish and the cone of depression to become smaller. However, the maximum distance of groundwater lowering around the box-cut was calculated as 208 m which is insignificant in terms of a groundwater availability impact.	C	During the site inspection, the grey-colored gunite material was observed along the box cut walls. However, Elders Colliery reported that steeper walls are not sealed with gunite as these could not be accessed due to safety risks.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.2.2	Maintain compaction and shape to ensure free draining of surface run-off to minimize rainfall infiltration.	C	During the site inspection, no concerns regarding surface water drainage were noted at the box-cut and the surrounding slopes were adequately vegetated.
3.3	Underground Mining Area		
3.3.1	Do not deviate from the planned bord and pillar mining and ensure stability integrity of overlying strata.	C	The mine confirmed that it uses bord and pillar method mining.
3.3.2	Mine according to design mine stability safety factor.	C	The mine confirmed that it uses bord and pillar method mining, and its safety factor.
3.3.3	Optimize storage of mine water make in mined out underground sections.	T/N	The mining operation has recently started, and the availability or mine water storage facilities underground has not been realised yet.
3.3.4	Monitor groundwater quality	C	Ground water quality is monitored as per Water Use License conditions.
3.3.5	Maintain underdrain system and dam integrity.	T/N	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
3.3.6	Monitor groundwater quality and level in backfilled box-cut during closure	T/N	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
4	SURFACE WATER		
4.1	Boxcut and Associated Infrastructure		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
-----	-----------	--------	-------------------------------

4.1.1	Appropriate stormwater management measures will be implemented, including the temporary diversion of upstream runoff from the construction and laydown areas.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
4.1.2	Servicing of construction vehicles will take place only in dedicated areas that are equipped with drip trays.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.3	Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	C	The Mining Infrastructure Area (MIA) Workshop area is concreted and contaminated effluent from the workshop is channeled via a V-Drain to the oil separator. The two 46 m <sup>3</sup> Diesel Tanks were observed to be adequately bunded and spill kits were available.
4.1.4	Spill-sorb or a similar product will be kept on site, and used to clean up hydrocarbon spills in the event that they should occur.	C	During the site inspection, spill kits were observed at the MIA Workshop.
4.1.5	Erosion protection measures will be implemented at steep areas	T/N	The condition is noted and accepted by Thungela Elders Colliery.
4.1.6	A waste management plan will be developed	C	A Waste Management Plan has been developed for Elders Colliery, as verified in the " <i>Thungela Resources Waste Management Standard</i> " (Doc. No. EUAIM-ENV-PRO-T01-005, dated 07 November 2022).
4.1.7	Water quality monitoring will be undertaken downstream of the construction areas, before and during construction where practical, in order to detect any increase in suspended solids or turbidity.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.8	The stormwater runoff from the overburden stockpile will be caught in a clean water cut off channel. The channel will convey the water to a silt trap from where it will discharge into the	C	During the site inspection, a cut off drain was observed around the overburden dump which discharged into a silt trap and subsequently into environment via a clean water channel.

	proposed clean water channel at the office area and conveyed into the veld.		
4.1.9	Prior to discharge to the veld, the water quality from overburden stockpile channel will be assessed and pumped to the PCD if not suitable for discharge to the environment.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
4.1.10	The maximum volume of water expected to be generated at the start of mining at the boxcut in 2018 is likely to be around 167 m3/day during the summer period. The water will be contained at the site, in the PCD, for re-use in dust suppression on haul roads, and as construction water, if the quality is suitable. The water will not be discharged to the environment.	C	During the site visit, it was noted that water from the Boxcut is pumped to the PCD, from where it is used in dust suppression.
4.1.11	The aerial extent of the disturbed and potentially contaminated areas will be kept to the demarcated construction footprint.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
4.1.12	Areas where dirty construction activities are carried out (e.g. servicing areas and workshops, fuel storage areas, waste storage areas) surrounded by bunds.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.13	Clean upslope runoff will be diverted around construction activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.14	Containment of all dirty water generated on the mine in a lined PCD, sized to have a risk of spill of 2% or less in any one year.	C	The PCD was lined and constructed in accordance with the designs approved in the WUL (Licence No. 06/B11D/ACFGJ/12473, dated 07 July 2022). During the site inspection, the PCD appeared to have adequate freeboard.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.1.15	Containment of all dirty water generated on the mine in a lined PCD, sized to have a risk of spill of 2% or less in any one year.	C	The PCD was lined and constructed in accordance with the designs approved in the WUL (Licence No. 06/B11D/ACFGJ/12473, dated 07 July 2022). During the site inspection, the PCD appeared to have adequate freeboard.
4.1.16	Provision of a water treatment plant to treat a maximum of 5.0 MI/day of dirty water generated at the mining operations.	C	During the site inspection at Water Treatment Plant, the auditors confirmed that the plant was treating dirty water at a maximum of 4 MI/ day.
4.1.17	Treatment of excess dirty water for reuse at the Elders operations, including supply of domestic and service water requirements.	C	The water system is designed in a manner that it will be operated as a closed water circuit. The Water Treatment Plant is not yet operational. The Sewage Treatment Plant is approximately 80% complete. This system is currently receiving grey water from the change houses. As it is not yet operational, the grey water is removed to the municipality.
4.1.18	Excess water that cannot be treated or reused will be pumped to storage in underground compartments at around 2025, when storage becomes available at Elders 2 Seam underground sections. Prior to storage becoming available underground, surplus water will need to be pumped to Goedehoop Colliery, should a review of the LOM plan not enable the early provision of storage on the 2 Seam.	T/N	Excess water is not yet stored underground or pumped to Goedehoop Colliery.
4.1.19	Provision of water management facilities with a risk of spill that is lower than 2% in any one year.	C	The PCD was lined and constructed in accordance with the designs approved in the WUL (Licence No. 06/B11D/ACFGJ/12473, dated 07 July 2022). During the site inspection, the PCD freeboard appeared to be adequate.

4.1.20	Washdown and waste water from the workshops will be passed through oil skimmers before discharging to the stormwater system for containment in the PCD and eventual treatment for reuse, or pumping to underground storage	C	The workshop has been constructed, and the oil separator is in the process of being constructed. The workshop is operational for minor maintenance. A trench is in place but not yet connected to the oil separator. The V-trench is still to be constructed linking the workshop trench with the oil separator.
4.1.21	An inspection and maintenance plan will be implemented on the stormwater system to ensure that all oil skimming and sediment handling facilities are maintained and that stormwater canals and pipelines remain unblocked and free flowing— monthly inspections will be carried out	C	Temporary and permanent stormwater channels were observed on site. Daily inspections are carried out to ensure that constructed channels are free flowing and unblocked.
4.1.22	In line with best practice, the PCDs will be always operated as empty as possible to ensure that sufficient stormwater retention capacity is available at all times.	C	The PCD is lined and operated in accordance with the designs and requirements approved in the WUL (Licence No. 06/B11D/ACFGJ/12473, dated 07 July 2022). During the site inspection, the PCD freeboard appeared to at least be 0.8 m.
4.1.23	In the event that there is insufficient available capacity in the main PCD during extreme rainfall conditions, excess stormwater will be pumped to the Elders underground storage compartments.	T/N	Underground water storage is not yet available.
4.1.24	The pollution control dams will be equipped with geomembrane liners to minimise leakage of contaminated water to the surface or ground water systems.	C	The PCD is lined and operated in accordance with the designs and requirements approved in the WUL (Licence No. 06/B11D/ACFGJ/12473, dated 07 July 2022).
4.1.25	The lining system on the PCDs will include a sub-surface drainage layer to detect any leakages, as well as to prevent the build-up of hydrostatic pressure beneath the geomembrane liner. Water collected in the sub-surface drainage system will be discharged to a sump and pumped back into the PCD.	C	PCD dams are lined as per the specifications as set out in the EIA / EMPr and WUL. No non-compliance observed.

4.1.26	Excess water will therefore drain via the dirty stormwater system to the PCD and will be pumped back to the water treatment plant for reuse in the mining operations	T/N	The WTP is not yet operational.
4.1.27	The WTP will be isolated within a designated dirty water area. All runoff and spills from the treatment plant will be collected in a sump, from which water will be pumped to the PCD.	T/N	The WTP is not yet operational.
4.1.28	Discharge water quality will be continuously monitored for early detection of discharge water quality problems.	T/N	No formal discharge is taking place on site.
4.1.29	Should upset conditions occur, or poor discharge water quality be detected, the WTP discharge will be directed to the PCD.	T/N	No formal discharge is taking place on site.
4.1.30	Initially one brine dam will be constructed, with a second to be constructed at a later stage, as the WTP's treatment capacity is increased.	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.31	The brine dams will be lined with a compacted clay layer with a 1.5 mm thick HPDE geomembrane, to minimize seepage of contaminated water to the groundwater system. The brine dams will also be equipped with a leak detection sump.	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.32	The gypsum pads will be paved with concrete. The concrete slabs will be underlain by a 1.5 mm thick HDPE geomembrane liner. The gypsum pad will be provided with concrete bunds to ensure no stormwater runoff from the area. The stormwater will be directed to a sump at the lower end of the gypsum area, from where water will be directed to the brine dam via a sloping pad and concrete lined channel	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.

4.1.33	Gypsum will be removed from the site on a regular basis. This will occur in a timely manner to prevent overloading of the gypsum drying pad	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.34	Removal from site of gypsum will be undertaken by an appropriately licensed waste removal contractor.	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.35	Disposal of gypsum will be at a licensed hazardous waste disposal facility, such as Holfontein Landfill.	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.36	The gypsum pad will be bunded to prevent clean stormwater from entering the pad and to contain all stormwater generated on the pad itself. stormwater from the pad will be collected in a sump and pumped to the PCD	T/N	The condition is noted and accepted by Elders Colliery. At the time of the audit, Brine Dams were not yet constructed.
4.1.37	An inspection and maintenance plan will be implemented to ensure that the pipelines and dams are kept in good working order	C	Pipelines are monitored by the ECO and issues notice are recorded in the ECO report and managed through the site's Enablon system.
4.1.38	A surface water quality monitoring programme will be implemented to detect any impacts. The WTP will be isolated within a designated dirty water area. All runoff and spills from the treatment plant will be collected	T/N	The WTP is not yet operational.
4.1.39	Erosion protection measures at the discharge point.	T/N	The WTP is not yet operational.
4.1.40	The quality of the water discharged will be closely monitored to ensure that it falls within the specified IRWQO at all times	T/N	The WTP is not yet operational.
4.2	Conveyor Belt and Servitude		

4.2.1	The Goedehoop pipe will be pressure tested before commissioning backfilling the trench to ensure that all joints are properly sealed	T/N	This activity has not yet been initiated.
4.2.2	Monitoring will be implemented downstream of all watercourse crossings to detect any impacts.	T/N	This condition falls outside this audit scope/period.
4.2.3	The conveyor service road will cross the watercourses by means of low-level crossings. These will be designed to withstand the flow velocities expected during extreme floods with minimal damage.	C	Service road has been constructed as per the approved design plan (2021).
4.2.4	The belt drive and transfer infrastructure at either end of the conveyor will be paved with concrete, bunded to prevent run-on of clean water and to contain dirty runoff.	C	Areas have been paved with concrete as per the approved design plan (2021). No non-compliance observed.
4.2.5	Conveyors will be rotated at the either end to ensure that the dirty side faces upwards at all times	C	Conveyors and associated infrastructure have been constructed as per the approved design plan (2021). No non-compliance observed.
4.2.6	Belt scrubbers will be provided at either end to clean the belt to prevent carbonaceous material from being dropped along the route.	C	Conveyors and associated infrastructure have been constructed as per the approved design plan (2021). No non-compliance observed.
4.2.7	The conveyor will be completely enclosed at the bridge crossing to prevent any spillage of water or coal into the watercourses	C	Conveyors and associated infrastructure have been constructed as per the approved design plan (2021). No non-compliance observed.
4.2.8	Watercourse crossings will be designed to accommodate at least the 1:100 year event without overtopping.	C	Conveyors and associated infrastructure have been constructed as per the approved design plan (2021). No non-compliance observed.
4.2.9	Dust suppression will be employed at the either end of the conveyor to minimise dust emissions	C	The procedure for dust monitoring was provided during the audit" "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) and provides the identification of dust sources and required management interventions as well as dust monitoring requirements. The dust fallout reports

			were reviewed during the audit and were found to be compliant for the audit period. No issues related to dust were noted during the site inspection.
4.2.10	A shroud will be provided along the entire conveyor length, on the upwind side, to prevent rain from falling directly onto the conveyor and to protect it from wind.	C	During the site inspection, the conveyor was observed to be roofed and partially covering on the west facing side.
4.2.11	Monitoring will be implemented downstream of all watercourse crossings along the conveyor route.	T/N	This condition falls outside this audit scope/ period.
4.3	Trucking of ore to Goedehoop		
4.3.1	Loading and offloading of trucks will take place only within the designated dirty water areas	C	During the site inspection, the truck loading was observed at the ROM stockpile, which is a designated dirty storm water area and the facility is lined.
4.3.2	Loading of trucks will be carefully controlled to ensure that overloading will not take place.	C	Trucks loading volumes/ tonnages are monitored through the onsite weighbridge located at the entrance/ exit of the ROM stockpile area. A weighbridge certificate is generated for every load and records the transaction date and time, vehicle details and tonnages removed.
4.3.3	Truck load boxes will be covered with tarpaulins to prevent spillage of coal from the backs of trucks during transport.	C	Elders Colliery reported that trucks are required to be covered before leaving the site.
4.4	Underground Mining Area		
4.4.1	The stormwater management measures, including the PCD will be decommissioned last, to ensure adequate stormwater management during the rehabilitation phase.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.2	A waste management plan will be developed for the closure phase, which will include the handling of contaminated materials I soils found on site.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

4.4.3	All traces of hydrocarbons and residual waste will be removed before infrastructure is demolished.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.4	Contaminated soils will be excavated and placed on the discard facilities prior to their rehabilitation or removed from site by an appropriately licensed waste contractor.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.5	An appropriate sewage management strategy will be implemented during the decommissioning phase, including decommissioning of the sewage treatment plant as late as possible in the process.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.6	Water quality monitoring will be undertaken downstream of the demolished areas, in order to detect any increase in suspended solids or turbidity.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.7	If erosion is evident or the water quality monitoring indicates an increase in suspended solids, water 1 management around the decommissioning areas twill. be reviewed.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.8	The incline shaft will be sealed, backfilled and made free, draining.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.9	The underground workings will be left to fill to a pre-determined environmental safe level (below decant level) before active water level management is implemented.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.10	Monitoring of water levels in the mine and the associated water quality is committed to. This will allow both calibration of the post mining water quality and water volumes.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

4.4.11	The water level in the workings will be actively managed to ensure it remains below the decant elevation.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.12	Treated water will be discharged to the river system	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.13	The incline shaft will be backfilled, rehabilitated and made free-draining.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.14	Monitoring of water levels in the mine and the associated water quality is committed to. This will allow both calibration of the post mining water quality and water volumes	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.15	The water level in the workings will be actively managed to ensure it remains below the decant elevation.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.4.16	Discharge of clean water to the river system	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
5	HERITAGE		
	Conveyor Belt between B Lock 20 and Goedehoop Colliery		
5.1	Graveyard to be fenced off and clearly demarcated. Upgrading should take place well outside of the fenced off area.	T/N	A cultural heritage assessment was undertaken as part of the 2015/2016 environmental authorisation process. No sites, features or objects of cultural heritage significance were identified in the proposed mining area.
5.2	The graveyard will be accessible to descendants		
5.3	A management plan for the preservation of the graves will be compiled by a heritage expert and will be implemented by the mine and appointed construction contractor		A management plan for grave preservation within Elders Colliery's property has been developed and was availed in the "Report on the assessment of
5.4	Dust control around the graveyard will be implemented		

5.5	Should the graves fall directly within the proposed conveyor footprint, the graves must be exhumed and relocated.		known grave sites and a Grave Sites Management Plan for the Thungela Resources (Pty) Ltd Elders Colliery project near Bethal, Gert Sibande District Municipality, Mpumalanga” (Doc. No. APAC023/10, dated February 2023) compiled by Apelser Archaeological Consulting. According to the report, no headstones or grave sites were identified during the site assessment conducted 2023.
5.6	Grave exhumation permits will be obtained from SAHRA should it be necessary to exhume the graves		
6	NOISE		
	Boxcut and Associated Infrastructure		
6.1	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit. The Action Plan included a task for installing silencers on vehicles (Action Plan ID: AP 00865783) which is indicated as completed on 23/02/24.
6.2	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.	C	Proof of vehicle maintenance plan was verified for the April 2024 audit period.
6.3	Comply with the relevant standards with regards to construction noise.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.4	Maintain complaints and grievance register and act promptly to complaints regarding noise	C	A complaints register is maintained on Enablon. No complaints were reported for the audit period.

6.5	Ensure high level of equipment maintenance especially intake and exhaust mufflers	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit. The Action Plan included a task for installing silencers on vehicles (Action Plan ID: AP 00865783) which is indicated as completed on 23/02/24 .
7 SOILS			
Boxcut and Associated Infrastructure			
7.1	Limiting the area of impact to as small a footprint as possible, inclusive of waste management facilities, resource stockpiles and the length of servitudes, access and haulage ways and conveyor systems wherever possible.	C	Elders Colliery adheres to the design plans approved in the Environmental Authorisation. During the site inspection, no activities were observed outside of the approved project footprint.
7.2	The development and inclusion of soil management as part of the general housekeeping operations, and the independent auditing of this management.	C	Soil management is monitored by the site ECO and related findings are tracked and managed with the Environmental Superintendent.
7.3	Concurrent rehabilitation of all affected sites that are not required for the operation – rehabilitation of temporary structures and footprint areas used during the feasibility investigation (geotechnical pits, trenching etc.) and the construction phase;	C	Hydroseeding of stockpiles was observed during the site inspection which indicates ongoing active soil management interventions.
7.4	Separation of the utilisable soils and ferric rete base materials from each other and from the soft overburden.	C	The Thungela Topsoil Handling and Management Procedure (Doc Ref: ENV-PRO-T01-004, Rev. No 0) states that topsoil/ subsoils of different types and another overburden, interburden and parting material should be stockpiled separately to prevent and minimize potential contamination. However, only separation of topsoil stockpiles and overburden stockpiling was observed on site.

7.5	Effective cladding of the berms and soil, ferricrete stockpiles/ heaps with vegetation or large rock fragments, and the minimising of the height of storage facilities to 15 m and soil berms to 1.5 m wherever possible.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
7.6	Restriction of vehicle movement over unprotected or sensitive areas, this will reduce compaction.	C	During the site inspection, no evidence of vehicle movement or tracks in unprotected or sensitive areas was observed, including at the wetland area adjacent to the PCD northern boundary.
7.7	Soil amelioration (cultivation) to enhance the oxygenation and growing capability (germination) of natural regeneration and/or seed within the stockpiled soils (maintain the soils viability during storage) and areas of concurrent rehabilitation.	T/N	The Thungela Topsoil Handling and Management Procedure (Doc Ref: ENV-PRO-T01-004, Rev. No 0) states that adequate soil amelioration is done before the soil is used for rehabilitation

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
7.8	The area must be fenced, and all animals kept off the area until the vegetation is self-sustaining.	C	The Thungela Elders site is adequately fenced, and no reports or incidents have been raised regarding animal impacting on revegetation practices.
7.9	The area must be fenced, and all animals kept off the area until the vegetation is self-sustaining.	C	The Thungela Elders site is adequately fenced, and no reports or incidents have been raised about animal impacting on revegetation practices.
7.10	Newly seeded/planted areas must be protected against compaction and erosion (Vetiver hedges etc).	T/N	The condition is noted and accepted by Thungela Elders Colliery.
7.10	Traffic should be limited where possible while the vegetation is establishing itself.	C	During the site inspection, no areas of vegetation establishment were accessed or impacted by vehicles.
7.11	Plants should be watered and weeded as required on a regular and managed basis where possible and practical.	C	The condition is noted by the licence holder, Thungela Elders Colliery.
7.12	Replace unhealthy or dead plant material	T/N	The condition is noted by the licence holder, Thungela Elders Colliery.
7.13	Fertilise, hydro seeded and grassed areas soon after germination	C	The overburden stockpile is located within a clean stormwater area, and trees have been planted along the boundary fence, providing a buffer. The topsoil screen between the road and the waste rock dump (WRD) is well vegetated, and an overall improvement in vegetation establishment was noted compared to the previous external environmental audit conducted in 2024. However, erosion was observed on the slopes of the overburden stockpile, which are steep. While some areas show well-established

			<p>vegetation, other sections remain bare.</p> <p>The clean water culvert was found to be almost silted. When silt is removed, it is stockpiled on the ROM lined footprint and then disposed of as contaminated material. The ROM stockpile itself is a lined facility, and a berm has been constructed around the facility for containment. Subsoil drains decant into a silt trap; however, the silt trap requires some cleaning to maintain effective functioning.</p>
7.14	Contour and stabilise slopes to be free draining and limit/control vehicle movement and dirty water outflows, vehicle maintenance and assessment of risk of contamination from infrastructure prior to demolition.	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).
7.15	Re-instatement of the stored soils onto areas of disturbance where infrastructure has been demolished and removed.	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).
7.16	Cultivate, amelioration and oxygenation of growing medium, the planting of required vegetative cover and irrigation if required, will reduce/manage erosion, decrease compaction and stabilise the land form. This will once cover has been obtained, effectively see the sites returned to a grazing land capability rating.	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).
7.17	Replace soils on rehabilitated areas as per the soils management plan.	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).
7.18	Effective soil cover and adequate protection from wind (dust) and dirty water contamination - vegetate and/or rock cladding.	T/N	The condition is noted by the licence holder, Thungela Elders Colliery.
7.19	Regular servicing of all vehicles in well-constructed and bunded areas.	C	Elders Colliery reported that only minor servicing of equipment and vehicles is undertaken at the MIA Workshop. During the site inspection, the MIA workshop was observed to be concreted and contaminated effluent from the workshop was channeled via a V-Drain to the oil separator.

7.20	Regular cleaning and maintenance of all access ways, conveyors and service ways, drains and stormwater control facilities	C	The mine undertakes regular cleaning and maintenance of all access ways, conveyors and service ways, drains etc.
7.21	Containment and management of spillage	C	Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides requirements for spill prevention and the process for spill management.
7.22	Soil replacement and the preparation of a seed bed to facilitate and accelerate the re-vegetation program' and-to limit potential erosion on all areas that become available- for rehabilitation (temporary servitudes).	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).
7.23	Soil amelioration (rehabilitated and stockpiled) to enhance the growth capability of the soils and sustain the soils ability to retain oxygen and nutrients, thus sustaining vegetative material during the storage stage. Monitoring should always be carried out at the same time of the year and at least six weeks after the last application of fertilizer.	T/N	The condition falls outside of the scope of the period (April 2024 - March 2025).

8 WETLANDS

Construction and Operation of Boxcut and Associated Infrastructure			
8.1	Fence off all wetland areas outside the direct development footprint_ Include a 50 m buffer zone around all wetlands within the fenced off area. Where fencing of the wetlands is not practical/desirable, the proposed development footprint should be fenced off and all activities contained within the fenced off area.	C	The project footprint has been fenced off and all activities are contained within the approved area.

8.2	Develop and implement a construction stormwater management plan prior to the commencement of site clearing activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.3	Rehabilitate and re-vegetate all disturbed areas as soon as possible following disturbance.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.4	Areas in and around the wetlands should not be cleaned, graded and ditched/trenched more than a week before construction activities commence.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.5	Divert flows from upslope of the construction area around the cleared area.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.6	No washing of equipment or machinery in any waterbody or wetland on site.	C	No washing activities were noted in the wetlands during the site inspection. The Mining Infrastructure Area (MIA) has a workshop and maintenance area. The ground area is adequately covered with a concrete and spill kits were available. The workshop is operational for minor maintenance. The trench is in place but is not yet connected to the oil separator. The V-trench is still to be constructed linking the workshop trench with the oil separator. The two (2) diesel tanks each with 46m <sup>3</sup> capacities, were also observed during the site inspection and were adequately banded.
8.7	Store potential contaminants in designated areas with spill containment measures.	C	The Mining Infrastructure Area (MIA) has a workshop and maintenance area. The ground area is adequately covered with a concrete and spill kits were available. The workshop is operational for minor maintenance. The trench is in place but is not yet connected to the oil separator. The V-trench is still to be constructed linking the workshop trench with the oil separator. The two (2) diesel tanks each with 46 m <sup>3</sup> capacities, were also observed during the site inspection and were adequately banded.

8.8	Keep sufficient spill clean-up material on site to deal with small spills	C	During the site inspection, spill kits were observed at the MIA Workshop where hazardous chemicals are stored, including two 46 m <sup>3</sup> Diesel Tanks.
8.9	Develop emergency response procedures to deal with large spills.	C	An emergency preparedness plan was verified during the audit period. In addition, Elders has the Thungela Resources internal procedure for addressing / reporting of environmental incidents by environmental personal and to government authorities (dated 02 February 2023); Environmental Spill Prevention and Handling Procedure (dated 24 October 2022) in place to addresses spillages.
8.10	Inform contractors regarding the location and sensitive of all wetland areas.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.11	Compile and implement alien vegetation management plan to remove and control establishment and spread of alien species	C	<p>Thungela Elder's Colliery appointed the Biodiversity Diversity Company to develop an Alien Invasive Plant (AIP) Management Plan: "Alien Invasive Plant Management Plan for the Elders Colliery identified ten Category 1(b) AIP species, which legally require control. The most invaded areas were found to be along the fence lines, with potential invasion into the project area.</p> <p>Thungela appointed Ekoinfo cc and Associates for AIP eradication, which commenced in October 2023 and was completed in February 2024. The report issued: "Elders Colliery Alien Invasive Control for the Period 2023/2024 Growing Season" dated March 2024 indicated successful removal of AIPs and recommended ongoing eradication be implemented to prevent reestablishment.</p>
8.12	Limit all activities to the conveyor servitude.	C	Activities are limited to the servitude of the project footprint as approved in

			the Environmental Authorisation.
8.13	No stockpiling of materials or placement of temporary construction infrastructure in the wetlands or within 50 m of the wetlands.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.14	Use existing farm tracks and roads for access, as well as for service road as far as possible.	C	Existing construction access roads are utilised
8.15	The conveyor should span the entire width of the active channel in valley bottom crossings. Conveyor footings within the wetlands should be kept to a minimum	C	Conveyor footings were not observed within the wetland areas.
8.16	Post construction alien invasive vegetation should be removed from site. This will require long-term follow up to ensure establishment of natural vegetation in disturbed areas.	T/N	This condition falls outside this audit scope/period.
8.17	Install erosion prevention measures prior to the onset of construction activities	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.18	No conveyor footings should be placed within the active channel of any valley bottom wetlands. The active channel should be spanned.	C	Conveyor footings were not observed within the wetland areas.
8.19	Service road crossings over valley bottom wetlands should be via low level bridges — low flows should be accommodated via culverts and flood flows should overtop the low level bridge.	C	Installation of culverts over crossings were observed on site.
8.20	Culvert capacity should be such to prevent impoundment upslope of the crossing and flow concentration downslope.	C	Culverts that have been constructed in accordance with the designs submitted and approved in terms of the environmental authorisation.
8.21	Ensure sufficient space under the conveyor to allow free movement	C	Sufficient space underneath the conveyors was confirmed during the site

	of small mammals		inspection.
8.22	Maintain a pillar size/safety factor that will ensure that no surface subsidence occurs under any of the wetlands on site.	C	The mine maintains a pillar size/safety factor to ensure that there is no surface subsidence under any wetland onsite.
8.23	Run-off from topsoil stockpiles should enter a sediment trap prior to discharge to the environment.	C	Run-off from the topsoil stockpiles was observed to enter a discharge point that is in good condition, and erosion gullies identified along the flow path have been mitigated. It was also noted that the discharge point is situated approximately 300 m away from the location approved in the Water Use Licence (WUL).
8.24	Regular inspection and maintenance of the entire conveyor route should be undertaken.	C	Regular inspections and maintenance of the conveyor route is undertaken by the mining department.
8.25	All vehicular and machinery movement along the servitude must be restricted to the service road. No off-road driving	C	All vehicular and machinery movement was observed to be restricted to the designated service road within the servitude, and no evidence of off-road driving was noted during the site inspection.
8.26	Protect discharge point against erosion and incorporate energy dissipaters.	C	Water discharge points are protected against erosion with energy dissipaters.
8.27	Ensure discharge water quality is always in line with the IRQO's set for the Olifants River	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.28	Only treated water to be discharged.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no water treatment has been commenced.

8.29	All brine ponds and sludge dams should be lined. A suitable engineered multiple liner should be installed in the brine ponds and sludge dams to ensure zero seepage of water out of the ponds	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.30	Leak detection mechanisms should form part of the liner system.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.31	Ponds should be of sufficient capacity to ensure that no overflow occurs	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.32	Brine should be temporarily stored on site and disposed of offsite in a suitable facility.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.33	A surface water quality monitoring plan and biomonitoring program should be implemented to monitor downslope water resources for signs of pollution derived from the brine ponds and sludge dams.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). At the time of the audit no Brine Dams were constructed.
8.34	Wetlands downslope of the treatment plant should be included in the water quality and biomonitoring plan for the mine	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).At the time of the audit no water treatment had commenced.
8.35	All decommissioning activities should be restricted to the disturbed footprint and make use of existing access routes and roads	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.36	All solid waste should be removed from site and disposed of at suitable waste disposal sites offsite.	C	Waste records indicating the removal of general waste and hazardous waste to the local municipal landfill and Holfontein respectively, were verified during the audit.
8.37	Areas where soils could potentially have been contaminated should be tested to determine contamination levels and appropriate remediation activities.	T/N	No soil contamination by chemicals or hazardous substances were reported for the audit period. During the site inspection, no soil contamination was observed.

8.38	Landscape disturbed area to the approximate natural landscape profile and to drain into the adjacent wetland as in the predevelopment state.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.39	Post mining landscape should avoid steep slopes and concentrated runoff.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.40	Re-vegetate replaced soils as soon as possible following placement using a suitable mix of indigenous species.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.41	Implement a long-term management and monitoring plan.	C	A long-term wetland monitoring plan is in place.
8.42	Construct and operate a water treatment plant during closure to treat water to acceptable levels (RQO).	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.43	Manage water levels within the mined-out areas to prevent decant	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
9	SOCIO-ECONOMIC		
	Development of the Elders Colliery		

9.1	Compile and implement the management measures detailed in the SLP.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of implementation.
9.2	Prioritise the employment of the communities residing within the Primary Zone for semi-skilled and unskilled job opportunities during construction.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of implementation.

9.3	Enforce the contractor management plan, especially relating to local recruitment and procurement.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of implementation.
9.4	Where possible, engage with the Govan Mbeki Local Municipality to identify opportunities of collaboration and capacity building for the provision of social services to the communities within the Primary Zone.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that although the SLP covers the condition, the auditors were provided with proof of liaison with the Govan Mbeki municipality. (Last meeting 08 February 2024).
9.5	Develop a clear and concise employment and recruitment policy that prioritizes local recruitment. Ensure that contractors adhere to this policy.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified.
9.6	Identify and support community development programmes that address challenges raised by population influx and spontaneous settlement.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of implementation.
9.7	Enforce the Anglo American principles regarding employee and contractor behaviour.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
9.8	Continuously monitor the housing and living conditions of employees receiving living out allowances.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of accommodation allowance support.

9.9	Support local government capacity for integrated development planning.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
9.10	Participate in the local government’s strategy to address issues related to and potentially enhanced by project-induced influx. This strategy will be developed in order to clearly define how participants, including AOL, local government and relevant stakeholders, intend to manage the impacts caused by influx where possible	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified via meeting minutes held with the nearby community forums. (Last meeting 08 February 2024).
9.11	Compile and implement the community health and safety initiatives of the Community Health and Safety Plan (CHSP), such as education and awareness programs that address social pathologies in neighbouring communities through established government departments.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified via meeting minutes held with the nearby community forums.
9.12	Implement vocational training programs to promote local workforce capacity as per the Labour and Human Resources Plan (LHRP).	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.
9.13	Purchase goods and services at a local level, if available. Formalize this policy in company purchasing guidelines and contractors' agreements.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. In addition, the contract signed by the auditor covers this policy.
9.14	Work closely with the local communities before and during the project to identify and communicate required skills and resources that the local community could provide.	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.

9.15	Provide or facilitate training of local people in mining and general business skills before and during mining activities, such as through internships, scholarships, and/or vocational and skills training programs.	C	The mine confirmed as is outlined in the 2022 Annual report, that there are interventions geared towards youth in the form of bursaries, learnerships that the mine is being implemented.
9.16	Prepare a detailed vocational training program in consultation with the local community to be implemented during the construction phase.	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted and the condition requirements were met. (Last meeting 08 February 2024).
9.17	Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices	C	The Elders Social Labour Plan was verified during the audit period. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted and the condition requirements were met. A stakeholder engagement plan and proof of such engagements was provided to the auditor for verification. The mine provided proof of the Elders Underground Access Project Stakeholder Intro dated April 2022 and Elders Colliery Local SMME Info Session dated September 2022.
9.18	In order to promote skills development and capacity building initiatives to both employees and the broader population and, in particular amongst youth, the SLP should focus on enterprise development and capacity building.	C	The Elders Social Labour Plan was verified during the audit period and proof of training was provided.
9.19	Support local government in their skills development and training initiatives.	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified that include proof of training.

9.20	Furthermore, AOL's closure plan will aim to reinforce the objectives of the SLP by reducing the reliance on AOL for employment by promoting skills transfer to enable alternative livelihoods.	C	The Elders Social Labour Plan was verified. In addition, the closure plan that was availed for verification is aligned to the general SLP commitments.
9.21	Support, participate and report on the payment and spending of revenues to government according to the EITI principles and guidelines.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified.
9.22	Include affected communities in the decision making processes of the project, particularly around potential Corporate Social Investment (CSI) opportunities, and SLP projects.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
9.23	Ensure that all stakeholder engagement includes women, youth and vulnerable groups	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
9.24	Provide regular and transparent feedback to the Vlakkuielen and Middelkraal communities specifically.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
9.25	Discuss and manage issues, concerns, changes and impacts related to the project as soon as they arise.	C	The Elders Social Labour Plan was verified. In addition, the final EMPr was availed for verification and the process of amending the EMPr was conducted in line with this condition.
9.26	Monitor and implement the Grievance Management Mechanism.	C	An incidents and complaints management plan was availed for verification.
9.27	Involve Local Ward Councillors and keep them informed about project developments and included in all stakeholder engagement processes. Their involvement will assist with the successful development of relationships between the mine, the municipality and the communities.	C	The Elders Social Labour Plan was verified during the audit period. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted and the condition requirements were met. A stakeholder engagement plan and proof of such engagements was provided to the auditor for verification. (Meeting held on 23 January 2024).

9.28	Regularly consult with local government through the around issues of community development, employment, co-operation and project activities.	C	Proof of liaison with local government was provided to the auditor during the April 2024 audit period. (Last meeting 08 February 2024).
9.29	Where possible CSI initiatives and SLP projects with the Govan Mbeki Local Municipality IDP with the goal of improving both sustainability and feasibility (this would only occur once the mine was operational).	C	The Elders Social Labour Plan was verified during the audit period. The implementation will be during the operational phase.
9.30	Durable participatory and consultative structures should be in place pre-closure to mitigate the impacts of closure.	N/A	This condition falls outside this audit scope/ period.
9.31	Continue the monthly discussion with the Vlakkuielen community until the rezoning to a rural residential area has been completed.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Meeting held on 23 January 2024).
9.32	Continue engaging the community and Ward Councillor to provide information about the project progress.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified.
9.33	Enforce the Anglo American Contractor Management Plan, which should in addition address accommodation, living standard, transport and health and safety standards of contractors.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
9.34	Employ local workers if qualified applicants with the appropriate skills are available. Formalize this policy in company Human Resources guidelines and contractors' agreements.	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.
9.35	Develop a clear and concise employment policy prioritizing local employment.	C	The Elders Social Labour Plan & WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.

9.36	Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	C	The Elders Social Labour Plan was verified during the audit period. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted, and the condition requirements were met. A stakeholder engagement plan and proof of such engagements was provided to the auditor for verification. The mine provided proof of the Elders Underground Access Project Stakeholder Intro dated April 2022 and Elders Colliery Local SMME Info Session dated September 2022.
9.37	Furthermore AOL's closure plan should aim at reinforcing the objectives of the SLP by reducing the reliance on AOL for employment by promoting skills transfer to enable alternative livelihoods.	C	The Elders Social Labour Plan was verified. In addition, the closure plan that was availed for verification is aligned to the general SLP commitments.

**TABLE 5: INTEGRATED ENVIRONMENTAL AUTHORISATION FOR PROPOSED MINING AND ASSOCIATED INFRASTRUCTURE FOR ELDERS COLLIERY EA NO: (MP) 30/5/1121312111(10117) EM DATED 08 JUNE 2023**

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
8	CONDITIONS		
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.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
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	Elders Colliery ensures agents, subcontractors, and employees undergo induction training in environmental management before contract commencement. The induction training presentation was reviewed by the auditors in "Proposed Mining & Associated Infrastructure at Elders Colliery in the Mpumalanga Province" (11 March 2024), compiled by Sibbs Alluring, and covers environmental good practice and topics related to the EA and EMPr conditions. A copy of the EA and EMPr was available at Thungela Elders Colliery site during the site inspection and forms part of the contract with contractors.
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	T/N	The condition is noted and accepted by Thungela Elders Colliery. There have been no changes to the project description during the audit period (April 2024 - March 2025).

	for the holder of the Authorisation to apply for further Authorisation in terms of the Regulations.		
8.1.4	Where any of the applicants contact details change, including the name of the responsible person, the physical or postal address and/or telephonic details, including the transfer of this authorization, the applicant must in writing notify the Regional manager of this Department, within fourteen (14) days of the above specified change.	T/N	The condition is noted and accepted by Thungela Elders Colliery. No changes to the applicant's details, including the name of the responsible person, physical or postal address and/or telephonic details, or transfer of the authorisation occurred during the audit period (April 2024 - March 2025).
8.1.5	A copy of this authorisation must be kept on site. The Authorisation must be produced to any Governmental officials who may requests to see it for inspection purposes and must be made available to the contractor(s)/ subcontractor(s) authorised to undertake to undertake work at the property.	C	A copy of the licence was available at Thungela Elders Colliery site during the site inspection and forms part of the contract with contractors.
8.1.6	This authorisation does not negate the holder of the Authorisation's responsible to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.1.7	After an appeal period has been expired and no good course to extent the appeal period has been submitted in accordance with Chapter 2 of the National Appeal Regulations of 2014, a thirty (30) day-written notice must be given to the Department that the activity will commence. Commencement for purpose for the purpose of this condition includes site preparation. The notice must include a date on which it is anticipated that the activity will commence.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).

8.2	SPECIFIC CONDITIONS		
8.2.1	Commissioning of the Activity		
8.2.1.1	<p>This Authorization is hereby solely granted for the additional ventilation shaft outside boxcut, road layout change to accommodate trucks, 192 kv powerline layout change (main bulk supply from Eskom)including substation and powerlines), relocation and increase in size of the pollution control dam to within a wetland, loading from stockpile and trucking of ore to an existing processing facility, widening of the R35 at intersections, coal loading area and clearing of vegetation in respect portions and 10of the farm Elandsfontein 75 IS, portion 1and 2 of the farm Geluk 226 IS, portion res, re/3, portion of portion 4,portion12/3 and portion 13/3 of the farm Haligewonnen 190IS, portions re- 5/1,6/1,7/1, 16/5 and re- 17/5 of the farm Legdaar 78 IS, portion of portion re, portion res, portion re 5, portion 6/3,8/3of the farm Middelkraal 50 IS, portions re/7, 12/5,13/5, 14/6,22/10,re/26,portion 27126, 28/26 of the farm Schuvekop 227 SI and portion re of the farm Vlakuilen 76 IS. Magisterial District of Bethal, Mpumalanga Region.</p>	C	<p>During the site inspection on 04 April 2025, no deviations from the authorised activities or properties were noted.</p>
8.2.1.2	<p>The activities may not commence without the necessary permits/licenses/approvals and/or service agreements, where it is relevant, from or with the relevant regulatory authorities whether national, provincial or local.</p>	T/N	<p>The condition is noted and accepted by Thungela Elders Colliery.</p>

8.2.1.3	The applicant must apply the principle of best practicable environmental option for all technologies used/implemented during mining.	T/N	This condition has been noted by Elders, the holder of the authorisation. The best practice environmental solutions will be employed throughout project lifecycle.
8.2.1.4	Find the attached waste conditions to be adhered to from Department of Water and sanitation support that Anglo American Inyos (Pty) Ltd-Elders Colliery.	N/A	The Environmental Authorisation reviewed during the audit did not include an attachment from DW&S containing waste conditions.

Pre-construction Phase			
a)	The applicant must appoint an independent Environmental Control Officer (ECO) who will monitor contractors, compliance with EMP and EA (see 8.2.2. Management of the activity for more details).	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
b)	The applicant must provide all contractors and sub-contractors with a copy of Environmental Management Plan and Environmental Authorisation prior to the mining activities.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
c)	All pre-construction phase mitigation measures outline in the Environmental Management Programme (EMP) attached in Environmental Impact Assessment report must be adhered to at all times.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
d)	In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).

e)	Appropriate notification sign must be erected at the mining area, warning the public (residents, visitors etc. about the hazard around the mining area and presence of heavy vehicles and machinery.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
f)	Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of stormwater runoff.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
g)	Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stock piling must not take place in drainage lines or areas where it will impede surface water runoff.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
i)	if any soil contamination is noted at any phase of the proposed activity (ies), contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated Soll must be investigated prior to the disposal, and this Department must be informed in this regard.	N/A	This condition falls outside of the scope of the audit period. No pre-construction activities were undertaken during the audit period (April 2024 - March 2025).
8.2.1.5	Access Roads and Traffic Impact		
a)	Necessary signage and traffic measures must be implemented for safe and convenient access to the site from adjacent roads.	C	Signage is installed in both traffic directions on the R35 at the entrance turn to Elders Colliery. The signage warns motorists of the movement of construction vehicles and that there is an obstruction on the Elders Mine side of the road.

b)	Access roads must be well maintained throughout the mining operation.	C	During the site inspection, the access roads were observed to be in good condition.
8.2.1.6 Air Quality Management			

a)	Proper measures must be put in place to suppress dust in order to minimize nuisance conditions.	C	<p>"The "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) outlines the procedure for identifying dust sources, conducting dust monitoring and implementing dust control measures.</p> <p>Monthly "Gravimetric Dust Fallout Monitoring Report" (Doc No. 22-1734-ECOI), compiled by Eco Elementum and Engineering (Pty) Ltd from March to December 2024 provides data from eight dust fallout monitoring gauges installed around Elders Colliery. The "Neels Farm 1" gauge (located 6 km northwest of Elders Colliery) exceeded the residential limit (600 mg/m<sup>2</sup>/day) in May 2024 (636 mg/m<sup>2</sup>/day) and December 2024 (1119 mg/m<sup>2</sup>/day). The report attributes these exceedances to dust generated from the adjacent gravel road and farm. Furthermore, the National Dust Control Regulations (No. R. 827 of 1 November 2013), permit dust fallout to exceed the limit twice annually, however, not in consecutive months. Finally, the report recommends that dust suppression measures be continued at Elders Colliery.</p> <p>The monthly ambient air quality reports, "Thungela Resource (Pty) Ltd Elders Air Quality Monitoring (AQM) Report" (Doc No. 22-1734), compiled monthly by Eco Elementum and Engineering (Pty) Ltd from January to December 2024 were reviewed during the audit. The reports provide data from the Element Air Unit</p>
----	---	---	--

			"Node 1" (located about 2.5 km southwest of Elders Colliery) which monitors wind speed, wind direction, temperature, relative humidity, precipitation, PM10 and PM2.5. According to the reports, no site-related PM2.5 or PM10 exceedances were recorded during the audit period (April 2024 - March 2025)."
b)	A speed restriction of 40km/h must be enforced and monitored on site for all mining vehicles.	C	The maximum speed limit signage of 40km/h was observed during the site inspection and no transgression were noted.
8.2.1.7	Proliferation of Alien Species		
a)	All mining/construction equipment and vehicles must be cleaned before entering and leaving the site to reduce the chances of spreading weeds and invasive species.	C	Thungela Elders personnel advised the auditors that cleaning of vehicles and equipment is undertaken prior to entering Elders colliery.
8.2.1.8	Noise		
a)	Mining/construction activity must be limited to normal working hours (7h00 -17h00).	C	An email dated 9 October 2025 from Ms. Maduka of the Department of Mineral Resources and Energy (DMRE) to Ms. Daphney of Thungela confirms that the specific Licence condition cannot be amended. However, the DMRE advised that the mine may apply to the DMRE Occupational Health Section should an amendment be required. Furthermore, the mine currently holds permission from the DMRE to conduct work seven (7) days a week, including weekends, in accordance with the approved operational schedule.

b)	Mining vehicles must be fitted with standard silencers prior to beginning construction.	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit. The Action Plan included a task for installing silencers on vehicles (Action Plan ID: AP 00865783) which is indicated as completed on 23/02/24 as well as a task to conduct noise monitoring during the construction phase at sensitive receptors (Action Plan ID:00865738) which is due by 28/06/2024.
8.2.1.9 Erosion Control Measures			
a)	All soil surfaces compacted as a result of mining/construction activities must be ripped, and imported materials must be removed.	C	No soil compaction was noted during the site inspection.
b)	Any erosion channel developed during mining/construction period or during vegetation establishment must be restored to a proper condition.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.1.1.0 Excavation Activities			
a)	Topsoil must be stripped and stockpiled prior to excavation in a designated area.	C	Topsoil is stockpiled on the western side of site parallel to the R35 and extends from the overburden dump toward the laydown area and conveyor.
b)	Under no circumstances should material stockpiles be disposed of outside the boundary of the mining area.	C	All stockpiles observed during the audit inspection were within the site boundary.
8.2.1.1.1 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 temporary dumping and littering of waste is allowed on site.	C	During the site inspection, general waste was stored in colour coded, labelled wheelie bins and 6m3 waste skips. No dumping or littering was observed.
b)	No waste must be disposed of through burying and burning.	C	No evidence of waste burying or burning was observed during the site inspection.
c)	All hazardous waste must be disposed of at an official registered site, or be removed by registered hazardous waste contractors.	C	Waste manifests were provided during the audit indicating that hazardous waste is disposed at Holfontein Hazardous Waste Disposal Facility, which is duly authorised .
d)	An emergency preparedness plan to address any pollution incidents (e. such as oil spillage etc)that occur on site must be developed.	C	A copy of the Emergency Response plan was reviewed during the audit and included actions to be taken in the event of a fire or spillages. Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides requirements for spill prevention and the process for spill management.
e)	Find the attached waste conditions to be adhered to from Department of Water and Sanitation support that Anglo American Inyos (Pty) Lta-Elders Colliery.	N/A	The "Waste Conditions" from the Department of Water and Sanitation were not available during the audit. Elders Colliery Environmental Superintendent confirmed that "Waste Conditions" were not attached to the Environmental Authorisation and the a query in this regard was submitted to the DMRE, however, no feedback has been received.
8.2.1.1.2	Surface and Groundwater		

a)	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	The Mining Infrastructure Area (MIA) has a workshop and maintenance area. The ground area is adequately covered with a concrete and spill kits were available. The two (2) diesel tanks each with 46m3 capacities, were also observed during the site inspection and were adequately bunded.
b)	Irrespective of the nature of a spillage (whether major or minor), all spillages must be cleaned up as soon as they occur.	C	Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the " <i>Thungela Resources Waste Management Standard</i> " (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd.
c)	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.	C	Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the " <i>Thungela Resources Waste Management Standard</i> " (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd. Contaminated material is disposed to Holfontein , which is duly authorised.
d)	Untreated sewage water must not be discharged directly into the Natural environment.	C	Untreated sewage water is not discharged into the natural environment.

8.2.1.3	Fire prevention and management		
a)	Fire extinguishers that are in good working conditions must be made available always for their usage during the occurrence of accidental fires.	C	During the site inspection, an adequate supply of serviced fire extinguishers was observed in the areas visited.
b)	Workers must be adequately trained in the handling of fire fighting equipment.	C	Thungela Elder's personnel advised the auditors that trained firefighters are appointed at the site.
c)	Open fires must strictly be prohibited.	C	Elders Colliery's fire safety requirements were communicated to the auditors during the site induction and the induction presentation " <i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i> " (11 March 2024), compiled by Sibbs Alluring was made available. No evidence of open fires was noted during the site inspection.
d)	Smoking must be prohibited in the vicinity of flammable substances	C	Demarcated smoking areas were observed during the audit and were located away from flammable storage areas.
8.2.1.1.4	stormwater 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, an adequate supply of serviced fire extinguishers was observed in the areas visited.
8.2.1.1.5	Safety		
a)	Potentially hazardous area must be demarcated with danger tape.	C	Barrier safety nets (yellow and orange) were observed around site to demarcate potentially hazardous areas 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	Restriction and safety signage were erected from the entrance gate and within the project footprint.
8.2.1.1 6	Emergency Response Plan		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
a)	An Emergency Response Plan should be available for accidental spills and fire fighting during both construction and operation of the project.	C	Pollution incidents and spillages are managed in accordance with the "Thungela Environmental Spill Prevention and Handling Procedure" (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the "Thungela Resources Waste Management Standard" (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd.
b)	In the event of emergency, the holder must notify the department within 24hrs, and contact relevant emergency services in the area.	T/N	The condition is noted and accepted by Thungela Elders Colliery. No reportable incidents occurred during the audit period (April 2024 - March 2025).
c)	All significant pollution incidents must be reported to this Department within forty eight (48) hours of occurrences.	T/N	The condition is noted and accepted by Thungela Elders Colliery. No reportable incidents occurred during the audit period (April 2024 - March 2025).
8.2.1.1 7	Compliance with Other Legislation		
a)	The National water Act, 1998 (Act 36 of 1998), with particular reference to the sections pertaining to mining in the proximity of dams and their catchments areas, rivers, marshes, streams, pans and other water courses.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
b)	The Environmental Conservation Act, 1989 (Act 73 of 1989) with particular reference to the requirements of section 20 of the above-mentioned Act.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

c)	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 prospecting activities, into the atmosphere.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
d)	The Conservation of Agriculture Resources Act, 1983 (Act 43 of 1983), with particular references to the sections pertaining to soil conservation.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
e)	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.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
f)	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 100 m from structures that must be protected; as well as those sections pertaining to rehabilitation of the surface.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
g)	The National Environmental Management Act, 1998 (Act 107 of 1998), with particular reference to the principles in chapter 2 of the said Act.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
h)	Firebreaks should be established in terms of the requirements and conditions of the National Veld and Forest Fires Act, 1998 (Act No. 101 of 1998).	T/N	The condition is noted and accepted by Thungela Elders Colliery.

i)	All provisions of the Occupational Health and safety Act, 1933 Act No.85 3) and any other applicable legislation must be adhered to by the holder of this Authorisation.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.1.1 8	Liability of the Holder of this Authorisation		
a)	The competent authority shall not be held responsible for any damages or losses suffered by the holder or his/her successor in title in any instance where mining construction or operation subsequent to construction are to be temporarily or permanently stopped for reasons of non-compliance by the holder with conditions or approval as set out in the document or any other subsequent document emanating from this Authorisation. The holder shall be responsible for all the costs necessary to comply with the above condition unless otherwise specified.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
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 parties concerned.	T/N	The condition has been noted and accepted by Thungela Elders Colliery. During the audit session, the auditor was informed that no complaints were received from the public.
c)	The contractor must ensure that serviceable ablution facilities are available for employees. It is the responsibility of the holder of the Authorisation to see to it that this condition is adhered to.	C	The mine provides for adequate and serviceable ablution facilities.

8.2.2	Management of the Activity		
8.2.2.1	A copy of an Environmental Authorisation and EMP must always be available on site so as to monitor compliance with conditions outlined in both the documents. Both documents must be used as on-site reference document during the life of mine.	C	A copy of this Environmental Authorisation is available at the environmental officer's file which is kept located on site. The auditor was provided with the file.

8.2.2.2	The Environmental Management Plan (EMP) prepared by Geo Soil and Water (Pty) Ltd (attached to the EIA Report) must be adhered to during the life of the mine.	C	Thungela Elder's Colliery appoints an External Environmental Auditors to conduct annual audits of their compliance with the conditions of the EMPr. An assessment as to compliance with the EMPr is set out below in Table 2, which indicates that Thungela Elders Colliery generally complies with the obligations set out therein.
8.2.2.3	All duties and responsibilities as outlined in the EMP attached are binding throughout the life of the mine.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.2.4	Any proposed amendments to the EMP 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 amended and adhered to.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.2.3	Appointment of Environment Control Officer		
a)	An Environmental Control Officer must be appointed, who will monitor and ensure compliance and correct implementation of all mitigation measures and provisions as stipulated in the Environmental Authorisation and Environmental Management Plan, prior to any commencement of mining activities on site.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
b)	The Environment Control Officer appointed must monitor the construction of the infrastructure to ensure that the layout plans are accordance to the designs and record important findings of the site inspection.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).

c)	The ECO must also monitor the implementation of specific elements of the Environmental Management Plan by contractors.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
d)	All duties and responsibilities as outlined in the EMP attached are binding throughout the life of mine.	N/A	This condition falls outside of the scope of the audit period. No construction activities were undertaken during the audit period (April 2024 - March 2025).
<b>8.2.4</b>	<b>Site Closure and Decommissioning</b>		
8.2.4.1	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 EMP or EMPr.	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).
8.2.4.2	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 2002), as amended.	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).
8.2.4.3	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.	N/A	This condition falls outside of the scope of the audit period. No site closure or decommissioning activities were undertaken during the audit period (April 2024 - March 2025).
<b>8.3</b>	<b>MONITORING</b>		
8.3.1	This Department reserves the right to monitor and audit the activity to ensure compliance with legislation and the conditions stipulated in this authorisation.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

8.3.2	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 mine is put into practice.	C	Baseline studies were conducted as part of the environmental authorisation process and findings were taken into account when developing the EMPr (dated 29 July 2020) that is being implemented on site as per condition 8.3.1 herein. Furthermore, procedures have been developed for Thungela Operations in support of ongoing monitoring and management of the environmental impacts from the site activities, including surface and groundwater monitoring, Waste Management, Stormwater, Erosion and Sediment Management, Topsoil Handling and Management, vegetation clearing, spill prevention and handling, dust control management and fire prevention. Additionally Thungela also appoints External Environmental Auditors to conduct annual compliance audits with the EMPr (Refer to Table 2 of this report for the EMPr external audit findings for 2024).
8.4	RECORDING AND REPORTING TO THE DEPARTMENT		
8.4.1	The authorization holder must submit annual environmental audit reports during the operation of the activity, unless otherwise requested by the department	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.4.2	The audit report must convey the following:		
8.4.3	The date in which the audit was carried out,	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.4.4	The outcome of the audit, in relation to the conditions stipulated in the environmental authorization and the approved EMPr as well as the actions taken to mitigate environmental impacts on site	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.4.5	Records of monitoring and for 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 Thungela Elders Colliery.

8.4.6	Records relating to compliance and non-compliance with the conditions of this authorisation must be kept in good order. Such records shall be made available to this Department within seven ( 7 ) days to receipt of a written request by the Department. Environmental compliance will further be monitored through complaints received from the public.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.4.7	All records relating to the implementation of the Environmental Management Plan must be kept in the office where it is safe and can be retrievable.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.5	<b>NON COMPLIANCE</b>		
8.5.1	In the event of non-compliance by any contractor during the mining/construction of the authorised activity, the holder of this Authorisation will be liable.	T/N	The condition is noted and accepted by Thungela Elders 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 Thungela Elders 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 Thungela Elders Colliery.
8.5.4	Records relating to compliance and non-compliance with the conditions of this Authorisation 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 compliance will further be monitored through complaints received from the public.	T/N	The condition is noted and accepted by Thungela Elders Colliery.

8.5.5	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 of such offence may result in section 49(a) being enforced.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
8.6	APPEAL OF AUTHORISATION		
8.6.1	The holder of the authorisation must notify every registered interested and affected party, in writing and within fourteen (14) days, of receiving the Department's decision,	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.6.2	The notification referred to in 9.1 must -		
8.6.3	Specify the date on which the Authorisation was issued.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.6.4	Inform the registered interested and affected parties of the appeal procedure provided for in Chapter 2 of the National Appeal Regulations of 2014.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.6.5	Advise the interested and affected parties that a copy of the Authorisation and reasons for the decision will be furnished on request.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).
8.6.6	An appeal against the decision must be lodged in terms of Chapter 2 of the National Appeal Regulations of 2014.	N/A	This condition falls outside of the scope of the audit period (April 2024 - March 2025).

**TABLE 6: ENVIRONMENTAL MANAGEMENT PROGRAM IN TERMS OF THE INTEGRATED ENVIRONMENTAL AUTHORISATION FOR PROPOSED MINING AND ASSOCIATED INFRASTRUCTURE FOR ELDERS COLLIERY EA NO: (MP) 30/5/1121312111(10117) EM DATED 08 JUNE 2023**

EMPr Report Title: SRK Consulting (November 2021) Final Integrated Environmental Impact Assessment Report and Environmental Management Programme Report for the proposed Elders Colliery Project. Report No. 570283. (pp 198 - 213).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1	TOPOGRAPHY		
1.1	Demarcate development footprint area and no development outside of this footprint will take place.	C	During the site inspection, Elders Colliery operational activities were limited to the servitude of the project footprint approved in the Environmental Authorisation and no deviations from the authorised activities or properties were noted.
1.2	Where required, vegetate stockpiles in order to minimise visual transformation of topography and ensure that the stockpiles are free draining.	NC	The overburden stockpile is located within a clean stormwater area, and trees have been planted along the boundary fence, providing a buffer. The topsoil screen between the road and the waste rock dump (WRD) is well vegetated, and an overall improvement in vegetation establishment was noted compared to the previous external environmental audit conducted in 2024. However, erosion was observed on the slopes of the overburden stockpile, which are steep. While some areas show well-established vegetation, other sections remain bare.
2	SOILS		
2.1	Construction of Boxcut and Associated Surface Infrastructure		

2.1.1	Concurrent rehabilitation of sites that are not required for operation (temporary structures and footprint areas used during the feasibility investigation e.g. geotechnical pits, trenching etc. and the construction phase).	C	Hydroseeding of stockpiles was observed during the site inspection which indicates ongoing active soil management interventions.
2.1.2	Separate utilisable soils (such as topsoil) and ferricrete base materials from each other and from the soft overburden.	C	The Thungela Topsoil Handling and Management Procedure (Doc Ref: ENV-PRO-T01-004, Rev. No 0) states that topsoil/ subsoils of different types and another overburden, interburden and parting material should be stockpiled separately to prevent and minimize potential contamination. However, only separation of topsoil stock piles and overburden stockpiling was observed on site.
2.1.3	Effective cladding of the berms and soil, ferricrete stockpiles/heaps with vegetation or large rock fragments and minimise the height of storage facilities to 15m and soil berms to 1,5m as possible.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
2.1.4	Restriction of vehicle movement over unprotected or sensitive areas by fencing the box-cut and associated surface infrastructure area.	C	During the site inspection, no vehicle tracks were observed in unprotected and sensitive areas, or outside of the approved footprint, including the wetland adjacent to the PCD boundary fence.
2.1.5	Vehicles to remain on the service road and limited to a speed of 40 km/h.	C	The maximum speed limit for internal access roads is 40km/ h and this is effectively communicated through road signage and site induction.
2.1.6	Natural soil amelioration (cultivation) to enhance the oxygenation and growing capability (germination) of natural regeneration and/or seed within the stockpiled soils (maintain the soils viability during storage) and areas of concurrent rehabilitation.	T/N	The Thungela Topsoil Handling and Management Procedure (Doc Ref: ENV-PRO-T01-004, Rev. No 0) states that adequate soil amelioration is done before the soil is used for rehabilitation
2.1.7	Limit the area of impact to as small a footprint as possible, inclusive of resource stockpiles and the length of servitudes, access and haulage ways and conveyor systems wherever possible.	C	Thungela Elders adheres to the design plan as approved in the environmental authorisation and all activities are limited to the project footprint.

2.1.8	The development and inclusion of soil management as part of the general housekeeping operations, and the independent auditing of this management.	C	Soil management is monitored by the site ECO and related findings are tracked and managed with the Environmental Superintendent.
2.1.9	Regular servicing of all vehicles in bunded areas to reduce spillage and contamination.	C	Elders Colliery reported that only minor servicing of equipment and vehicles is undertaken at the MIA Workshop. During the site inspection, the MIA workshop was observed to be concreted and contaminated effluent from the workshop was channeled via a V-Drain to the oil separator.
2.1.10	Develop a leak/spill procedure for all possible areas of leaks/spillages.	C	Pollution incidents and spillages are managed in accordance with the " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc No: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides requirements for spill prevention and the process for spill management.
2.1.11	Spill kits to be provided for on site for spill clearing.	C	During the site inspection, spill kits were observed at the MIA Workshop where hazardous chemicals are stored, including two 46 m <sup>3</sup> Diesel Tanks.
2.1.12	Spills will be cleared and remediated immediately as per the mine's Leak/Spill Procedure.	C	Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the " <i>Thungela Resources Waste Management Standard</i> " (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd.
3	BIODIVERSITY		
3.1	Construction of Boxcut and Associated Surface Infrastructure		

3.1.1	Fence development footprint area prior to commencement of construction to limit impact on adjacent vegetation areas.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
3.1.2	Removal of vegetation should be restricted to the relevant infrastructure footprints only.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
3.1.3	Topsoil should be stored separately to be used in rehabilitation and landscaping.	C	During the site inspection, the topsoil stockpiles were observed at the approved localities, along the western site boundary (adjacent to the R36) and at the area around the boxcut.
3.1.4	No off-road driving into the natural remaining vegetation allowed especially by heavy machinery.	C	During the site inspection, no vehicle tracks were observed in natural areas, or outside of the approved footprint, including the wetland adjacent to the PCD boundary fence.
3.1.5	The development of erosion gullies will be monitored and managed.	T/N	<ul style="list-style-type: none"> <li>The condition is noted and accepted by Thungela Elders Colliery.</li> </ul>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.1.6	Prevent any and all effluent from the mining activities from entering the wetland habitat.	C	Effluent from mining activities is effectively managed to prevent entry into the wetland habitat, in line with the licence condition. No incidents of surface or groundwater pollution were found during the audit period (April 2024 - March 2025).
3.1.7	Prevent all open fires, provide fire-safe zones, facilities and suitable fire control measures.	C	Elders Colliery's fire safety requirements were communicated to the auditors during the site induction and the induction presentation " <i>Proposed Mining &amp; Associated Infrastructure at Elders Colliery in the Mpumalanga Province</i> " (11 March 2024), compiled by Sibbs Alluring was made available. During the site inspection, fire breaks were noted at the area adjacent to the PCD boundary fence; the emergency assembly points were clearly demarcated and an adequate supply of serviced fire extinguishers was observed in the areas visited. The " <i>Thungela Fire Management Procedure</i> " (Doc No. EUAIM-ENV-PRO-T01-0009, dated 24 October 2022) provides requirements for preparing and maintaining firebreaks and the formation of fire teams.
3.1.8	Use of branches of trees, shrubs or any vegetation for fire making purposes is strictly prohibited.	C	No open fires are allowed on the mine, and there is no use of trees, shrubs or any vegetation for fire making.
3.1.9	Provide sufficient on-site ablution, sanitation and waste management and hazardous materials management facilities.	C	The mine has sufficient on-site ablution, sanitation and waste management facilities.

3.1.10	The use of the natural veld for ablution purposes shall not be permitted under any circumstances.	C	The use of natural veld for ablution purposes is prohibited.
3.1.11	Dust control on all roads to be prioritised.	C	The procedure for dust monitoring was provided during the audit" "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) and provides the identification of dust sources and required management interventions as well as dust monitoring requirements. The dust fallout reports were reviewed during the audit and were found to be compliant for the audit period (April 2024 to March 2025). No issues related to dust were noted during the site inspection.
3.1.12	A road management plan to be compiled prior to commencement of construction activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
3.1.13	Areas of natural vegetation within the box-cut and associated infrastructure area will be inspected for the presence of species of concern during the optimal time prior to construction by a registered and experienced biodiversity team.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
3.1.14	Employees at the mine will be educated about the environment, the species of concern present and how to deal with them.	C	Environmental awareness is communicated through induction and covers species within the project area.
3.1.15	Employees will not be allowed to harvest, utilise, manage or control any natural resource (water, soil, flora, fauna) unless it is done within the framework of a biodiversity action plan.	C	Employees are aware during induction that they are not permitted to make use any resources found on site and that environmental protection is prioritised at the site.

<p>3.1.16</p>	<p>No alien invasive plant or feral animal (domestic or wild) will be introduced into the area or be allowed to establish or spread in the area.</p>	<p>C</p>	<p>A copy of the Alien Invasive Management Procedure: "Thungela Alien Invasive Management Procedure" (Doc Ref: EN-PRO-T01-0008, VERSION 0) was reviewed during the audit and provided emphasis on the prevention of introduction of AIPs to the site as well as management interventions for the site.</p>
<p>3.1.17</p>	<p>An alien invasive eradication programme will be developed and implemented during the life of mine.</p>	<p>C</p>	<p>Thungela Elder's Colliery appointed the Biodiversity Diversity Company to develop an Alien Invasive Plant (AIP) Management Plan: "Alien Invasive Plant Management Plan for the Elders Colliery identified ten Category 1(b) AIP species, which legally require control. The most invaded areas were found to be along the fence lines, with potential invasion into the project area.</p> <p>Thungela appointed Ekoinfo cc and Associates for AIP eradication, which commenced in October 2023 and was completed in February 2024. The report issued: "Elders Colliery Alien Invasive Control for the Period 2023/2024 Growing Season" dated March 2024 indicated successful removal of AIPs and recommended ongoing eradication be implemented to prevent reestablishment.</p>

3.1.17	An alien invasive eradication programme will be developed and implemented during the life of mine.	C	<p>Thungela Elder's Colliery appointed the Biodiversity Diversity Company to develop an Alien Invasive Plant (AIP) Management Plan: "Alien Invasive Plant Management Plan for the Elders Colliery identified ten Category 1(b) AIP species, which legally require control. The most invaded areas were found to be along the fence lines, with potential invasion into the project area.</p> <p>Thungela appointed Ekoinfo cc and Associates for AIP eradication, which commenced in October 2023 and was completed in February 2024. The report issued: "Elders Colliery Alien Invasive Control for the Period 2023/2024 Growing Season" dated March 2024 indicated successful removal of AIPs and recommended ongoing eradication be implemented to prevent reestablishment.</p>
3.1.18	No animal may be hunted, trapped, snared or captured for any purpose whatsoever. Fences and boundaries will be patrolled weekly in order to locate and remove snares and traps.	C	Thungela Elders prohibits animal hunting, trapping, snaring and this is communicated in the site environmental induction. Fencing was noted and security inspections are done daily as part of the patrols.
3.1.19	Speed of vehicles will be limited to 40 km/h.	C	The maximum speed limit for internal access roads is 40km/ h and this is effectively communicated through road signage and site induction.
4	SURFACE WATER		
4.1	Construction of Boxcut and Associated Surface Infrastructure		
4.1.1	Construction will be limited to the project footprint.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

4.1.2	No-go zones will be delineated for contractor’s camp.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.3	Appropriate stormwater management measures will be implemented, including the temporary diversion of upstream run-off from the construction and laydown areas.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.4	Surface water management measures, such as stormwater canals, sediment traps and PCDs are to be constructed first to ensure that runoff and dirty water spills are contained.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.5	Servicing of construction vehicles will take place only in dedicated areas that are equipped with drip trays.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.6	Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.7	Spill-sorb or a similar product will be kept on site, and used to clean up hydrocarbon spills in the event that they should occur.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.8	Erosion protection measures will be implemented at steep areas.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.9	A waste management plan will be developed for the construction phase.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.1.10	An appropriate sewage management strategy will be implemented during the construction phase.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.11	Water quality monitoring will be undertaken downstream of the construction areas, before and during construction where practical, in order to detect any increase in suspended solids or turbidity.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.12	If erosion is evident, or the water quality monitoring indicates an increase in suspended solids, water management around the construction areas will be reviewed.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.13	Surface water management measures, such as stormwater canals, sediment traps and PCDs are to be constructed first to ensure that runoff and dirty water spills are contained.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.14	The stormwater runoff from the overburden stockpile will be caught in a clean water cut off channel. The channel will convey the water to a silt trap from where it will discharge into the proposed clean water channel at the office area and conveyed into the veld.	C	The stormwater runoff from the overburden stockpile is directed to the cleanwater cutoff channel.
4.1.15	Prior to discharge to the veld, should the water quality from overburden stockpile channel not be suitable for discharge this should be pumped to the PCD.	T/N	The condition is noted and accepted by Thungela Elders Colliery.
4.1.16	Water quality monitoring will be undertaken downstream of the construction areas before and during construction, where practical, in order to detect any increase in suspended solids or turbidity	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

4.1.17	The maximum volume of water expected to be generated at the start of mining at the box-cut in 2018 is likely to be around 167 m3/day during the summer period. The water will be contained at the site, in the PCD, for re-use in dust suppression on haul roads, and as construction water, if the quality is suitable. The water will not be discharged.	C	The water is contained at the site, in the PCD, for re-use in dust suppression on haul roads, and as construction water, if the quality is suitable. The water will not be discharged.
4.1.18	Surface water management measures, such as stormwater canals, sediment traps and PCDs are to be constructed first to ensure that runoff and dirty water spills are contained.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.19	The aerial extent of the disturbed and potentially contaminated areas will be kept to the demarcated construction footprint.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.20	Areas where dirty construction activities are carried out (e.g. servicing areas and workshops, fuel storage areas, waste storage areas) surrounded by bunds.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.1.21	Clean upslope runoff will be diverted around construction activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
4.2	Truck Transport of Coal from Elders Colliery to Processing Operations		
4.2.1	Loading of trucks will take place only within the designated dirty water areas.	C	During the site inspection, the truck loading was observed at the ROM stockpile, which is a designated dirty storm water area and the facility is lined.

4.2.2	Loading of trucks will be carefully controlled to ensure that overloading will not take place.	C	Trucks loading volumes/ tonnages are monitored through the onsite weighbridge located at the entrance/ exit of the ROM stockpile area. A weighbridge certificate is generated for every load and records the transaction date and time, vehicle details and tonnages removed.
4.2.3	Truck load boxes will be covered with tarpaulins to prevent spillage of coal from the backs of trucks during transport.	C	Elders Colliery reported that trucks are required to be covered before leaving the site.
5	GROUNDWATER		
5.1	Storage of Overburden Material		
5.1.1	Verify AMD generation potential of the overburden only through sampling and analyses of core samples from the box-cut location.	C	The " <i>Elders Colliery Geochemical Assessment (2023) and AMD Plan</i> " (Doc No. Delh.2020.027-7(8E) and Delh.2023.027-7(L), dated 06 September 2024), compiled by Delta-H Water Systems Modelling Pty (Ltd) was availed during the audit. The report assessed the Acid Rock Drainage (ARD) of roof and floor overburden samples and the results indicate that the overburden material should be treated being potentially long-term acid generating.
5.1.2	Ensure that all coal is removed from the overburden before placement on the stockpile.	C	Coal is removed from overburden prior to stockpiling of overburden.
5.1.3	Coal removed from overburden to be taken to various collieries within the area and included in the processing plant.	C	Coal is taken to an existing processing plant.
5.1.4	Place the overburden on a properly prepared and compacted footprint.	C	The overburden stockpile was observed to be placed on a designated compacted area.
5.1.5	A civil engineering design, incorporating footprint preparation, leachate control and stormwater management, must be undertaken and submitted to DWS for approval.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

5.2 Construction of Boxcut and Associated Surface Infrastructure

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.2.1	Sealing of box-cut walls with shotcrete/gunite which will allow groundwater levels to reduce and re- establish the cone of depression.	C	During the site inspection, the grey-colored gunite material was observed along the box cut walls. However, Elders Colliery reported that steeper walls are not sealed with gunite as these could not be accessed due to safety risks.
5.2.2	Should an instance arise where groundwater be contaminated, this will be investigated and responded to accordingly to address the matter.	C	Ground water pollution Incidents are logged onto Thungela's Enablon system and mitigation measures are tracked until the incident is closed by effective and preventative measures. Records and evidence relating to the closure of the incident are retained by the Environmental Superintendent.
5.2.3	A leak/spill detection plan should be devised and implemented for all possible areas of leaks/spillages.	C	Leaks may be detected through the groundwater monitoring borehole network which are monitored and analysed on a monthly basis.
5.2.4	Regular groundwater monitoring from existing and proposed monitoring boreholes will be undertaken to identify any potential contamination of groundwater resources.	C	Ground water quality monitoring is undertaken on a monthly basis in accordance with the requirements of the WUL and as outlined in the environmental assessment and monitoring programme that was submitted to the DW&S on 02 August 2022.
5.2.5	Should pollution be identified within the groundwater resources, the source of the pollutants will be identified and the applicable remediation measures will be implemented.	T/N	no pollution incident recorded. Ground water pollution Incidents are logged onto Thungela's Enablon system and mitigation measures are tracked until the incident is closed by effective and preventative measures. Records and evidence relating to the closure of the incident are retained by the Environmental Superintendent.
5.2.6	Develop and maintain a Standard Operating Procedure to contain and remediate any accidental hydrocarbon or other chemical	C	Pollution incidents and spillages are managed in accordance with the "Thungela Environmental Spill Prevention and Handling Procedure" (Doc

	spillages.		Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the "Thungela Resources Waste Management Standard" (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd.
5.2.7	Spill kits should be made available and used in the event of a spill. Contain spillage, excavated and dispose of contaminated material/soil required at accredited disposal site.	C	During the site inspection, spill kits were observed at the MIA Workshop where hazardous chemicals are stored, including two 46 m <sup>3</sup> Diesel Tanks. Pollution incidents and spillages are managed in accordance with the "Thungela Environmental Spill Prevention and Handling Procedure" (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill clean-up. Disposal of contaminated material is undertaken according to the "Thungela Resources Waste Management Standard" (Doc No. EUAIM-ENV-PRO-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd.
6	WETLANDS		

6.1	Construction of Boxcut and Associated Surface Infrastructure		
6.1.1	The proposed development footprint will be fenced off and all activities contained within the fenced off area.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.2	Clearly demarcate the proposed development footprints and limit all activities to the demarcated area.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.3	Develop and implement a construction stormwater management plan prior to the commencement of site clearing activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.4	Rehabilitate and re-vegetate all disturbed areas as soon as possible following disturbance.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

6.1.5	Inform contractors regarding the location and sensitive of all wetland areas.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.6	Areas in and around the wetlands should not be cleaned, graded and ditched/trenched more than a week before construction activities commence.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.7	Divert flows from upslope of the construction area around the cleared area.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.8	Regular low level humps will be installed along linear preferential flow paths such as construction roads/tracks, perpendicular to the slope to slow down and disperse flows.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.9	Divert flows from upslope of the construction area around the cleared area.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.10	No washing of equipment or machinery in any waterbody or wetland on site.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.11	Store potential contaminants in designated areas with spill containment measures.	C	All potential contaminants are stored in designated areas with spill containment infrastructure and/or measures.
6.1.12	Keep sufficient spill clean-up material on site to deal with small spills	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.1.13	Develop emergency response procedures to deal with large spills.	C	The mine has developed an emergency response procedure.
6.1.14	Compile and implement alien vegetation management plan to remove and control establishment and spread of alien species.	C	The mine has developed an alien vegetation management plan

6.2 Shaft Area and Surface Infrastructure			
6.2.1	Design of surface infrastructure areas should be optimised to minimise the size of the development footprint and to minimise encroachment into wetland habitat.	C	Elders Colliery's mining operation is undertaken in accordance with the design plan approved in the Environmental Authorisation and all activities are limited to the project footprint. During the site inspection, no deviations from the authorised activities or properties were noted.
6.2.2	All disturbance footprints must be separated from adjacent wetland habitat by a fence, either a security fence or as minimum a five-strand cattle fence (ideally not utilising barbed wire). The purpose of the fence is to clearly demarcate sensitive areas and prevent accidental vehicle and construction machinery access to these areas.	C	During the site inspection, no vehicle tracks were observed in natural areas or outside of the approved footprint, including the wetland adjacent to the PCD boundary fence. Fencing was observed around Elders Colliery's site boundary and inspections of the fence are conducted in the daily security patrols.
6.2.3	All construction staff should be educated on the sensitivity of wetland areas and should be made aware of all wetland areas near the construction sites.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.4	Locate all temporary stockpiles, constructor's camps, laydown areas, ablution facilities etc. within the fenced off surface infrastructure footprint area.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.5	Develop and implement a construction stormwater management plan prior to the commencement of site clearing activities. Such a plan should aim to minimise the transport of sediment off site. Sediment traps and sediment barriers should be installed where necessary, and stormwater discharge points should be protected against erosion and incorporate energy dissipaters.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

6.2.6	Erosion within the construction site must be minimised through the following:		
6.2.7	Limiting the area of disturbance and vegetation clearing to as small an area as possible.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.8	Where possible, undertaking construction during the dry season	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.9	Phasing vegetation clearing activities and limiting the time that any one area of bare soil is exposed to erosion.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.10	Control of stormwater flowing onto and through the site. Where required, stormwater from upslope should be diverted around the construction site.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.11	Prompt stabilisation and re-vegetation of soils after disturbance and construction activities in an area are complete.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.12	Protection of slopes. Where steeper slopes occur, these should be stabilised using geotextiles or any other suitable product designed for the purpose, where possible.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.13	<b>Sediment transport off the site must be minimised through the following:</b>		
6.2.14	Where possible, establishing perimeter sediment controls through the installation of sediment fences along downslope verges of construction sites where surface flows leave the site. Where channeled or concentrated flow occurs, reinforced sediment fences or other sediment barriers such as sediment basins should be used (refer to US EPA guidelines on Stormwater Pollution Prevention);	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.15	Discharge of stormwater from the construction site into adjacent grassland. Discharged flows must be slow and diffuse.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

6.2.16	Regular inspection and maintenance of sediment controls.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.17	Ensure that no equipment is washed in the wetlands of the area and No abstraction of water from the wetlands or pans should be allowed unless expressly authorized in the IWULA.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.18	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. Larger spills should be reported to the Environmental Co-coordinator and the relevant authorities (DWS) immediately, with specialists appointed to oversee the clean-up operations.	C	Pollution incidents and spillages are managed in accordance with the: " <i>Thungela Environmental Spill Prevention and Handling Procedure</i> " (Doc Ref: EUAIM-ENV-PRO-T01-0002, dated 24 October 2022) which provides adequate guidance for spill prevention and spill management. Disposal of contaminated material is undertaken according to the " <i>Thungela Resources Waste Management Standard</i> " (Doc No. EUAIM-ENV-PR O-T01-005, dated 11 July 2022), compiled by Sibbs Alluring (Pty) Ltd. During the site inspection, spill kits were observed at the MIA Workshop where hazardous chemicals are stored, including two 46 m <sup>3</sup> Diesel Tanks. no chemical/ oil spillages were noted.
6.2.19	An alien vegetation management plan should be drawn up and implemented to limit the spread of alien vegetation into wetland habitat.	C	Thungela Elder's Colliery appointed a Biodiversity Specialist to develop an Alien Invasive Management Plan. A copy of the report was made available during the audit: "Alien Invasive Plant Management Plan for the Elders Colliery Underground Mining Project" dated February 2023 and prepared by the Biodiversity Company.  During the site assessment, the specialist identified ten (10) Alien Invasive Plant species and all classified as category 1b species, which require compulsory control. The most invaded portions were identified along the

			fence lines, but invasion is rapidly moving into the wetland areas and further potential invasion within the project area.
6.2.20	All disturbed areas outside the direct development footprints should be rehabilitated and re-vegetated as soon as possible.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.21	A detailed procedure for the handling, storage and disposal of waste must be developed and fully implemented during construction.	C	A Waste Management Plan has been developed for Elders Colliery, as verified in the " <i>Thungela Resources Waste Management Standard</i> " (Doc. No. EUAIM-ENV-PRO-T01-005, dated 07 November 2022).
6.2.22	The construction servitudes should be regularly inspected for waste or littering, and clean-up operations initiated if required.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
6.2.23	Treated water discharged to the environment must not impact negatively on the Olifants River RQOs and be in line with DWS General Limits for treated sewage effluent.	T/N	This condition falls outside this audit scope/ period.
6.2.24	Where possible, Discharge point to be located at the bottom of the slope to minimise erosion. Monitor discharge point for any erosion damage over time.	T/N	This condition falls outside this audit scope/ period.
7	AIR QUALITY		
7.1	Clearing will be limited to the designed footprint.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025). Elders Colliery is operational and no clearing was undertaken during the audit period.

7.2	Water sprays on unpaved roads and well as the conveyor transfer point.	C	Elders Colliery employs water bowsers for dust control on the internal access roads, as verified during the site inspection.
7.3	Traffic control done through restriction of traffic volumes on internal roads and vehicle speeds.	C	Elders Colliery implements stringent site access controls and traffic measures, as observed during the site inspection. The maximum speed limit for internal access roads is 40km/ h and this is effectively communicated through road signage and site induction.
7.4	Vehicle speeds within the mining area will be limited to 40 km/h.	C	The maximum speed limit for internal access roads is 40km/ h and this is effectively communicated through road signage and site induction.
7.5	Maintain a complaints register and capture the dust related complaints in the grievance mechanism. The grievance will be investigated by the applicable Elders Colliery representative in order for the complaint to be resolved and closed out.	C	No dust complaints were reported for the audit period (April 2024 - March 2025).
7.6	Implementation of a dust monitoring programme to monitor dust impacts.	C	<p>"The "Thungela Dust Control Management" (Doc Ref: EUAIM-ENV-PRO-T01-0006, Version 0) outlines the procedure for identifying dust sources, conducting dust monitoring and implementing dust control measures.</p> <p>Monthly "Gravimetric Dust Fallout Monitoring Report" (Doc No. 22-1734-ECOI), compiled by Eco Elementum and Engineering (Pty) Ltd from March to December 2024, provides data from eight dust fallout monitoring gauges installed around Elders Colliery. The "Neels Farm 1" gauge (located 6 km northwest of Elders Colliery) exceeded the residential limit (600 mg/m<sup>2</sup>/day) in May 2024 (636 mg/m<sup>2</sup>/day) and December 2024 (1119 mg/m<sup>2</sup>/day). The report attributes these exceedances to dust generated from the adjacent gravel road and farm. Furthermore, the National Dust Control Regulations</p>

			<p>(No. R. 827 of 1 November 2013), permit dust fallout to exceed the limit twice annually, however, not in consecutive months. Finally, the report recommends that dust suppression measures be continued at Elders Colliery.</p> <p>The monthly ambient air quality reports, "Thungela Resource (Pty) Ltd Elders Air Quality Monitoring (AQM) Report" (Doc No. 22-1734), compiled monthly by Eco Elementum and Engineering (Pty) Ltd from January to December 2024 were reviewed during the audit. The reports provide data from the Element Air Unit ""Node 1"" (located about 2.5 km southwest of Elders Colliery) which monitors wind speed, wind direction, temperature, relative humidity, precipitation, PM10 and PM2.5. According to the reports, no site-related PM2.5 or PM10 exceedances were recorded during the audit period (April 2024 - March 2025)."</p>
8	NOISE		
8.1	Ensure high level of equipment maintenance, especially intake and exhaust mufflers.	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit.. The Action Plan included a task for installing silencers on vehicles (Action Plan ID: AP 00865783) which is indicated as completed on 23/02/24 .
8.2	Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.	C	Proof of vehicle maintenance plan was verified for the April 2024 audit period.
8.3	Comply with the relevant standards with regards to construction noise.	C	The Action Plan to address the findings from the External Environmental Audit in 2023 is managed through Thungela's Enablon System and was reviewed during the audit.. The Action Plan included a task to conduct noise monitoring during the construction phase at sensitive receptors (Action Plan ID:00865738) which is due by 28/06/2024.

8.4	Maintain complaints and grievance register and act promptly to complaints regarding noise.	C	No complaints were reported for the audit period.
9	HERITAGE		
9.1	As no cultural heritage significant features were found during the specialist study, no mitigation is required. However, should any features be found during the construction phase, a chance find procedure will be implemented to manage historical sites that may be identified during clearing activities. Contractors will be informed of chance find procedure as part of environmental awareness and training.	C	A management plan for grave preservation within Elders Colliery's property has been developed and was availed in the " <i>Report on the assessment of known grave sites and a Grave Sites Management Plan for the Thungela Resources (Pty) Ltd Elders Colliery project near Bethal, Gert Sibande District Municipality, Mpumalanga</i> " (Doc. No. APAC023/10, dated February 2023) compiled by Apelser Archaeological Consulting. According to the report, no headstones or grave sites were identified during the site assessment conducted 2023.
10	BLASTING		
10.1	Construction of Boxcut and Associated Surface Infrastructure		
10.1.1	Revisit the box-cut blast design and undertake a proper detail design. Manage ground vibration at the R35 and Middelkraal communities	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.2	Maintain a minimum safe distance of 207 m (recommended is a minimum of 500 m) from any blasting done. This may be greater but not less. The blaster has a legal obligation concerning the safe distance and will determine this distance prior to the construction phase.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.3	All persons within 500 m from a blast will be cleared and where necessary evacuation will be conducted with all the required pre-blast negotiations.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.

10.1.4	Ensure that ground vibration is within limits.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.5	The current proposed stemming lengths (4.1 m) as defined in the blast design will be maintained to ensure control on fly rock. Specific designs where distances and blast is known should be considered.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.6	Blasting should be undertaken when the road usage is low. Early mornings and late afternoons should be avoided.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.7	No blasting will take place in fog conditions.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.8	Blasting will not be undertaken during night time.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.9	Blasting will not be undertaken when strong winds are blowing.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.10	Blasting times will be fixed.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.

10.1.1 1	Blasting notice boards will be setup at various routes around the project area, informing road users, farmers and communities of blasting dates and times.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 2	The Middelkraal and Vlakkuijen communities will be informed of planned blasting.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 3	Third party consultation and monitoring will be undertaken for all ground vibration and air blast monitoring work.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 4	Blasting parameters applied to blasting activity will ensure that ground vibration levels are within acceptable standards near the R35.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 5	Close the R35 during blasts.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 6	Obtain required authorisations from the roads agency/department to close road and blast in close proximity to R35.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 7	Notification of road closures will be communicated prior to the blasting activities.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.1 8	Monitoring will be undertaken during blasting activities .	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.

			the audit period.
10.1.1 9	Roads will be cleared after blasting should any material have landed on the road.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.2 0	Mitigation measures for Ground vibration: Human perception and Ground vibration: Impact on R35	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.2 1	Mitigation measures for Ground vibration: Human perception and Ground vibration: Impact on R35	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
10.1.2 2	Remove fallen rocks from topsoil stockpiles.	N/A	The condition falls outside of the scope of the audit period (April 2024 - March 2025). No blasting activities occurred in relation to the Boxcut during the audit period.
11	TRAFFIC		
11.1	Trucking of Interburden and Coal		
11.1.1	The TIA (Appendix G11) has analysed all critical intersection with the mine generated traffic. Intersection upgrades are to be provided as recommended in this TIA. The upgrade of the intersections will provide additional capacity on the road network.	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).
11.1.2	The TIA has analysed all critical intersection with the mine generated traffic. Intersection upgrades are to be provided as recommended in	T/N	The condition falls outside of the scope of the audit period (April 2024 - March 2025).

	this TIA. The upgrade of the intersections will provide additional capacity on the road network.		
11.1.3	The road authority is to provide maintenance and rehabilitation on all roads.	T/N	This condition is noted by Thungela Elders Colliery.
12	SOCIO ECONOMIC		
12.1	Compile and implement the management measures detailed in the SLP.	C	The Elders Social Labour Plan (Ref: Elders Colliery 2020  In compliance with Regulation 46 (d) of the Mineral and Petroleum Resources Development Act, 2002) was verified during the audit period and implementation of condition parameters was verified.
12.2	Prioritise the employment of the communities residing within the Primary Zone for semi-skilled and unskilled job opportunities during construction.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition and the auditors were provided with proof of implementation.
12.3	Enforce the contractor management plan, especially relating to local recruitment and procurement, which should in addition address accommodation, living standard, transport and health and safety standards of contractors;	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition and the auditors were provided with proof of implementation.
12.4	Where possible, engage with the Govan Mbeki Local Municipality and Gert Sibande District Municipality to identify opportunities of collaboration and capacity building for the provision of social services to the communities within the Primary Zone.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that although the SLP covers the condition, the auditors were provided with proof of liaison with the Govan Mbeki municipality. (Last meeting 08 February 2024).
12.5	Develop a clear and concise employment and recruitment policy that prioritizes local recruitment and communicate this through established communication protocols. Ensure that contractors adhere	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified.

	to this policy.		
12.6	Identify and support community development programmes that address challenges raised by population influx and spontaneous settlement.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of implementation.
12.7	Enforce the Anglo-American principles regarding employee and contractor behavior.	N/A	The condition refers to Anglo America principles.
12.8	Continuously monitor the housing and living conditions of employees receiving living out allowances.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. It should be noted that the SLP covers the condition, and the auditors were provided with proof of accommodation allowance support.
12.9	Support local government capacity for integrated development planning.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
12.10	Participate in the local government’s strategy to address issues related to and potentially enhanced by project-induced influx. This strategy will be developed in order to clearly define how participants, including AAIC, local government and relevant stakeholders, intend to manage the impacts caused by influx where possible.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified via meeting minutes held with the nearby community forums. (Last meeting 08 February 2024).
12.11	Compile and implement the community health and safety initiatives of the Community Health and Safety Plan (CHSP), such as education and awareness programs that address social pathologies in neighboring communities through established government departments.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified via meeting minutes held with the nearby community forums.

12.12	Implement vocational training programs to promote local workforce capacity as per the Labour and Human Resources Plan (LHRP).	C	The Elders Social Labour Plan C WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.
12.13	Work closely with the local communities before and during the project to identify and communicate required skills and resources that the local community could provide. Employ local workers if qualified applicants with the appropriate skills are available. Formalize this policy in company Human Resources guidelines and contractors' agreements.	C	The Elders Social Labour Plan C WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.
12.14	Purchase goods and services at a local level, if available. Formalize this policy in company purchasing guidelines and contractors' agreements.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. In addition, the contract signed by the auditor covers this policy.
12.15	Provide or facilitate training of local people in mining and general business skills before and during mining activities, such as through internships, scholarships, and/or vocational and skills training programs.	C	The mine confirmed as is outlined in the 2022 Annual report, that there are interventions geared towards youth in the form of bursaries, learnerships that the mine is being implemented.
12.16	Prepare a detailed vocational training program in consultation with the local community to be implemented during the construction phase.	C	The Elders Social Labour Plan C WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted, and the condition requirements were met. (Last meeting 08 February 2024).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
12.17	Through the stakeholder engagement process ensure that expectations are managed around employment opportunities and practices.	C	The Elders Social Labour Plan was verified during the audit period. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted, and the condition requirements were met. A stakeholder engagement plan and proof of such engagements was provided to the auditor for verification. The mine provided proof of the Elders Underground Access Project Stakeholder Intro dated April 2022 and Elders Colliery Local SMME Info Session dated September 2022.
12.18	Employ staff from across community groups and the Project area and keep recruitment and employment records, distributing short-term opportunities to as many as possible.	C	The Elders Social Labour Plan C WBHO Elders - SED Progress Report was verified during the audit period and implementation of condition parameters was verified.
12.19	Develop an SLP that considers integrated development of communities impacted by the Project.	C	The Elders Social Labour Plan (Ref: Elders Colliery 2020  In compliance with Regulation 46 (d) of the Mineral and Petroleum Resources Development Act, 2002) was verified during the audit period and implementation of condition parameters was verified.
12.20	Implement management and enhancement measures as per the SLP.	C	The Elders Social Labour Plan (Ref: Elders Colliery 2020  In compliance with Regulation 46 (d) of the Mineral and Petroleum Resources Development Act, 2002) was verified during the audit period and implementation of condition parameters was verified.
12.21	Support, participate and report on the payment and spending of revenues to government according to the EITI principles and guidelines.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified.
12.22	Include affected communities in the decision making processes of the project, particularly around potential Corporate Social Investment (CSI) opportunities, and SLP projects.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
12.23	Ensure that all stakeholder engagement includes women, youth and vulnerable groups.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
12.24	Provide regular and transparent feedback to the Vlakkuijen and Middelkraal communities specifically.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Last meeting 08 February 2024).
12.25	Discuss and manage issues, concerns, changes and impacts related to the project as soon as they arise.	C	The Elders Social Labour Plan was verified. In addition, the final EMPr was availed for verification and the process of amending the EMPr was conduct in line with this condition.
12.26	Monitor and implement the Grievance Management Mechanism.	C	An incidents and complaints management plan were availed for verification.
12.27	Involve Local Ward Councilors and keep them informed about project developments, and included in all stakeholder engagement processes. Their involvement will assist with the successful development of relationships between the mine, the municipality and the communities.	C	The Elders Social Labour Plan was verified during the audit period. As part of the authorisation process, the auditor confirmed that a Social Impact Assessment study was conducted, and the condition requirements were met. A stakeholder engagement plan and proof of such engagements was provided to the auditor for verification. (Meeting held on 23 January 2024).
12.28	Regularly consult with local government through the GMLM around issues of community development, employment, co-operation and project activities.	C	Proof of liaison with local government was provided to the auditor during the April 2024 audit period. (Last meeting 08 February 2024).
12.29	Where possible CSI initiatives and SLP projects with the GMLM IDP with the goal of improving both sustainability and feasibility (this would only occur once the mine was operational).	C	The Elders Social Labour Plan was verified during the audit period. The implementation will be during the operational phase.
12.30	Durable participatory and consultative structures should be in place pre-closure to mitigate the impacts of closure.	N/A	This will be applicable during the closure phase of the mine.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
12.31	Continue the monthly discussion with the Vlakkuielen community until the rezoning to a rural residential area has been completed.	C	The Elders Social Labour Plan was verified during the audit period and implementation of condition parameters was verified. (Meeting held on 23 January 2024).

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

---

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

A total of two (2) non-compliances were raised in terms the conditions of the Environmental Authorisations and Environmental Management Programmes audited in Section 4 of this Report. Table 7 below provides a summary of the non- compliances raised.

### **5.2. RECOMMENDATIONS**

Recommendations to address and rectify the non-compliance are provided in Table 7.

According to the Regulation 34(4) of the EIA regulation, 2011 state the following i.e.: "Where the findings of the environmental audit report contemplated in sub regulation 1 indicate-

- (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or
- (b) insufficient levels of compliance with the environmental authorisation, EMPr or closure plan,

the holder must, when submitting the environmental audit report to the competent authority in terms of sub regulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.

Recommendations to amend certain conditions of the EA/ EMPr to rectify non-compliances are provided in Table 7, as applicable.

**TABLE 7. SUMMARY OF NON-COMPLIANCES AND ELDERS COLLIERY ACTION PLAN**

NC No.	EA/EMPR REF No.	DESCRIPTION	ACTION	RESPONSIBLE PERSON	TARGET DATE
NC	EA (REF NO:30/5/1121312111(10117) EM DATED 29 JULY 2020)	Net screen and/ or fine mist sprays are not used for dust management of stockpiles.	1. Implement sprays at the ROM Stockpile to suppress dust.	Irvin Vilakazi	30 October 2026
	AIR QUALITY-CONDITION 1.7	Elders Colliery reported that reseedling of stockpiles and vegetation establishment is undertaken as a management intervention to prevent dust emissions. During the site inspection, no concerns regarding dust emissions in relation to stockpiles were observed.	2. Apply Hydroseeding and Posi seeding around all stockpiles for vegetation establishment.	Eva Seko	30 August 2026
NC	EMPR FOR EA NO: (MP) 30/5/1121312111(10117) EM DATED 08 JUNE 2023	The overburden stockpile is located within a clean stormwater area, and trees have been planted along the boundary fence, providing a buffer. The topsoil screen between the road and the waste rock dump (WRD) is well vegetated, and an overall improvement in vegetation establishment was noted compared to the previous external environmental audit conducted in 2024. However, erosion was observed on the slopes of the overburden stockpile, which are steep. While some areas show well-established vegetation, other sections remain bare.	1. Apply Hydroseeding and Posi seeding around all stockpiles for vegetation establishment.	Eva Seko	30 August 2026
	TOPOGRAPHY-CONDITION 1.2		2. Reassess stormwater Management around the stockpile areas.	Moses Maredi	30 March 2026

## **6. CONTINUED IMPROVEMENT**

---

During the previous audit period (2023/24), a total of three (3) findings were recorded. In the current audit period, the number of findings has decreased to two (2), reflecting a 33% reduction in overall findings. This indicates some improvement in compliance performance and responsiveness to previously identified issues.

However, it is important to note that the two current findings (100% of the findings raised this period) are repeat findings, representing 66% of the findings raised during the previous audit period. The recurrence of these findings demonstrates that corrective and preventive actions previously implemented were either not fully effective or not sustained over time. This suggests a need for strengthened monitoring, enhanced implementation of corrective measures, and improved accountability to prevent further recurrence.

## 7. CONCLUSION

---

The audit of the 2024/25 period concludes that Elders Colliery has demonstrated a measurable improvement in its overall compliance performance, as evidenced by the reduction in audit findings from three (3) in the 2023/24 cycle to two (2) in the current period. This 33% decrease indicates a positive response to previously identified issues and shows progress in certain areas of environmental management and compliance implementation.

Despite this improvement, the audit also highlights areas of concern. Both findings raised during the current audit cycle are repeat findings, representing 66% of the findings identified in the previous audit period. The recurrence of these issues suggests that the corrective and preventive actions implemented during the previous cycle were either insufficiently effective or not consistently maintained. This indicates a need for more robust follow-up processes, and improved accountability mechanisms to ensure sustainable compliance.

Overall, while Elders Colliery has made progress in reducing the total number of findings, sustained improvement will require focused attention on recurring non-compliances. The implementation of effective corrective actions and accompanied by strengthened oversight, will be essential to prevent the repetition of findings in future audit cycles and to achieve full compliance with regulatory and management requirements.

## **APPENDIX A - AUDITOR DECLARATION**

The Environmental Assessment Practitioner General declaration:

I, **TEBOHO MOTINYANE**, declare that –

- I act as the independent environmental practitioner in this Audit.
- I will perform the work relating to the audit in an objective manner, even if this results in views and findings that are not favourable to the auditee.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting environmental compliance audits, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations, and all other applicable legislation.
- I have not and will not engage in, conflicting interests in the undertaking of the activity.
- I will provide the competent authority with access to all information at my disposal regarding the audit, whether such information is favourable to the auditee or not; will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.

Disclosure of Vested Interest (delete whichever is not applicable)

I do not have and will not have any vested interest (either business, financial, personal, or other) in the activity other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014.

Signature   
Company: **NTC GROUP (PTY) LTD**  
Date: 12 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 \_\_\_\_\_