



LEPHALALE COALBED METHANE EXPLORATION PROJECT (LCBM)

PERFORMANCE ASSESSMENT REPORT FOR THE ENVIRONMENTAL EXTERNAL AUDIT 2024/ 2025

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.

PASAREF NO. 5/2/2/102

ENVIRONMENTAL AUTHORISATIONS:

12/1/9-7/1(i)-W1 (25 January 2012)

AUDIT PERIOD:

FEBRUARY 2024 – MARCH 2025

03 November 2025

PREPARED BY:

NTC GROUP (PTY) LTD
CDH BUILDING
1 PROTEA PLACE
FREDMAN DRIVE
SANDTON
2031
TEL: +27 11 462 2022
EMAIL: thinga@ntcgroup.co.za

PREPARED FOR:

THUNGELA RESOURCES LIMITED
LCBM EXPLORATION PROJECT
PO BOX 1521
SAXONWOLD
2132
SOUTH AFRICA
TEL: 013 691 5697
EMAIL: yukosi.tinghitsi@thungela.com

DOCUMENT CONTROL

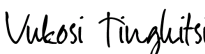


Version Control

NO.	DATE	OVERVIEW OF CHANGES	AUTHOR
0.1	08 September 2025	Create report	Raisibe Mabiza
0.2	11 September 2025	Review	Thinga Nethanani & Tanja Bekker
0.3		Authorise	Liezel Louw Vukosi Tinghitsi Kgaowelo Moshokwa

Distribution List

NAME	EMAIL ADDRESS
Liezel Louw	Liezel.louw@thungela.com
Vukosi Tinghitsi	vukosi.tinghitsi@thungela.com
Nadine Joubert	nadine.joubert@thungela.com
Kgaowelo Moshokwa	kgaowelo.moshokwa@thungela.com

Required Approvals

NAME	POSITION	SIGNATURE	DATE
Vukosi Tinghitsi	LCBM Environmental Officer		2025/12/05
Kgaowelo Moshokwa	Thungela Environmental Specialist		2025/12/09
Andre Meyer	LCBM – Project Manager		

Related Documents

DOCUMENT	DATE	FILE NAME
N/A	N/A	N/A

DISCLAIMER AND TERMS OF USE

This document has been prepared by an NTC Group company with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Thungela Operations (Pty) Limited (Thungela) (the client) as part or all of the services it has been appointed by the client to carry out. 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 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, 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 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 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

1. INTRODUCTION	1
1.1. BACKGROUND.....	1
1.2. TERMS OF REFERENCE	6
1.3. ASSUMPTIONS AND LIMITATIONS.....	7
2. AUDITORS	8
3. AUDIT METHODOLOGY	8
3.1. INFORMATION COLLATION AND REVIEW.....	8
3.2. SITE VERIFICATION	10
3.3. ASSESSMENT METHODOLOGY	10
4. RESULTS	12
5. RESULTS OF THE AUDIT	56
5.1. SUMMARY OF NON-COMPLIANCES	56
5.2. DETAILS OF THE NON-COMPLIANCES	57
5.3. CONTINUED IMPROVEMENT	58
6. CONCLUSION	58

TABLE OF FIGURES

Figure 1: Lephallale Coalbed Methane Exploration Project Location	3
Figure 2: 37-Spot Bulk Yield and 5 Spot Test Sites within the Lephallale Coalbed Methane Exploration Project Locality Map	4
Figure 3: Lephallale Coalbed Methane Exploration Project Exploration Rights (Consolidated Exploration Right EMPr, 2015).....	5

TABLE OF TABLES

Table 1: Audit Team Contact Details	8
Table 2: Assessment Criteria	11
Table 3: Environmental Authorisation for the proposed development of 37 Gas Prospecting Wells and associated infrastructure on the farm Nooitgedacht 403 LQ within Lephallale Local Municipality of Waterberg District: Limpopo Province (Ref No: 12/1/9-7/1(i)-W1 dated 25/01/2012)	13
Table 4: Environmental Management Programme approved in the Environmental Authorisation for the Proposed Development of 37 Gas Prospecting Wells and Associated Infrastructure on the farm Nooitgedacht 403 LQ within Lephallale Local Municipality of Waterberg District: Limpopo Province (Ref No: 12/1/9-7/1(i)-W1 Dated 25/01/2012).	23
Table 5: Environmental Management Program for the Waterberg Coal Bed Methane Pre-feasibility 5 Spot Test approved in terms of the Exploration Right issued by PASA (REF NO. 5/2/2/102).	34
Table 6: Consolidated Environmental Management Programme approved in terms of the consolidated Exploration Right (PASA ref: 5/2/2/102) for Coal Bed Methane in Waterberg District Municipality	52
Table 7: Summary of non-compliances.	56

APPENDICES

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

1. INTRODUCTION

1.1. BACKGROUND

Thungela Operations (Pty) Limited (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 project is located approximately 25 km northwest of Lephalale and 31km boarded by the Deelkraal and Lephalale/Stockpoort Road (R510) as depicted in Figure 1.

The Lephalale Coal Bed Methane Exploration (LCBM) Project is owned by Thungela and holds a consolidated exploration right for gas that was issued by South African Petroleum Agency with exploration right reference number 13/03/002/1B ER. The objective of the LCBM project is to access the commercially viable volumes of natural methane gas that can be extracted from the Waterberg Coalfield. As part of the legal requirements to commence a consolidated exploration right was granted to Thungela on the 5th of August 2019 (as amended, 7th of September 2020). Furthermore, the following associated authorisations were received:

- LCBM Exploration 5 Spot: Pre-feasibility Production Test Project (Refer to Figure 2):
 - The 5 Spot project is under care and maintenance as of the 19th of December 2014 and currently has the following active authorisations-
 - Standard Environmental Management Programme for LCBM Exploration 5 Spot: Pre-feasibility Production Test Project, dated August 2005 and approved January 2006, with PASA reference No.: 5/2/2/102.
- 37-Spot Coalbed Methane Bulk Yield Test depicted in Figure 2:
 - Proposed 37-Spot Coalbed Methane Bulk Yield Test, approved 12 January 2012, with LEDET Reference Number: 12/1/9-7/1(i)-W1 and amended subsequently by PASA Reference number: 12/3/002 dated, 18 November 2014, 30 June 2017, 30 November 2020.
 - Environmental Management Programme for the proposed 37-Spot Coalbed Methane Bulk Yield Test, dated August 2010 and approved September 2015, with PASA reference No.: 12/3/1/02/2/2/1.
- Waterberg 1 and 11 Gas Exploration Project are located on the properties depicted in Figure 3.
 - The Waterberg 1 exploration drilling activities were completed in 2012 and a consolidated EMPr as part of the section 102 application exploration right extension was granted under PASA reference 12/3/002.
 - The Waterberg 1 EMPr and Waterberg 11 Consolidated EMPr superseded the following:
 - Environmental Management Programme for Waterberg 1, dated July 2015 and the renewal was approved 13 July 2017, PASA Reference No.: 12/03/02, 12/03/04, 12/03/07, 12/03/08, 12/03/24, 12/03/76 and 12/03/191; and

- Environmental Management Programme for Waterberg 11 dated 2006 and the renewal was approved in January 2019, PASA Ref No.:12/3/022/1A.

NTC Group (Pty) Ltd was appointed by Thungela as the independent Environmental Assessment Practitioner (EAP) to undertake the 2024 annual EMPR Environmental Audit/ Performance Assessment and this report presents the methodologies and findings thereof. This report fulfils the compliance assessment requirement for March 2024– February 2025 period.

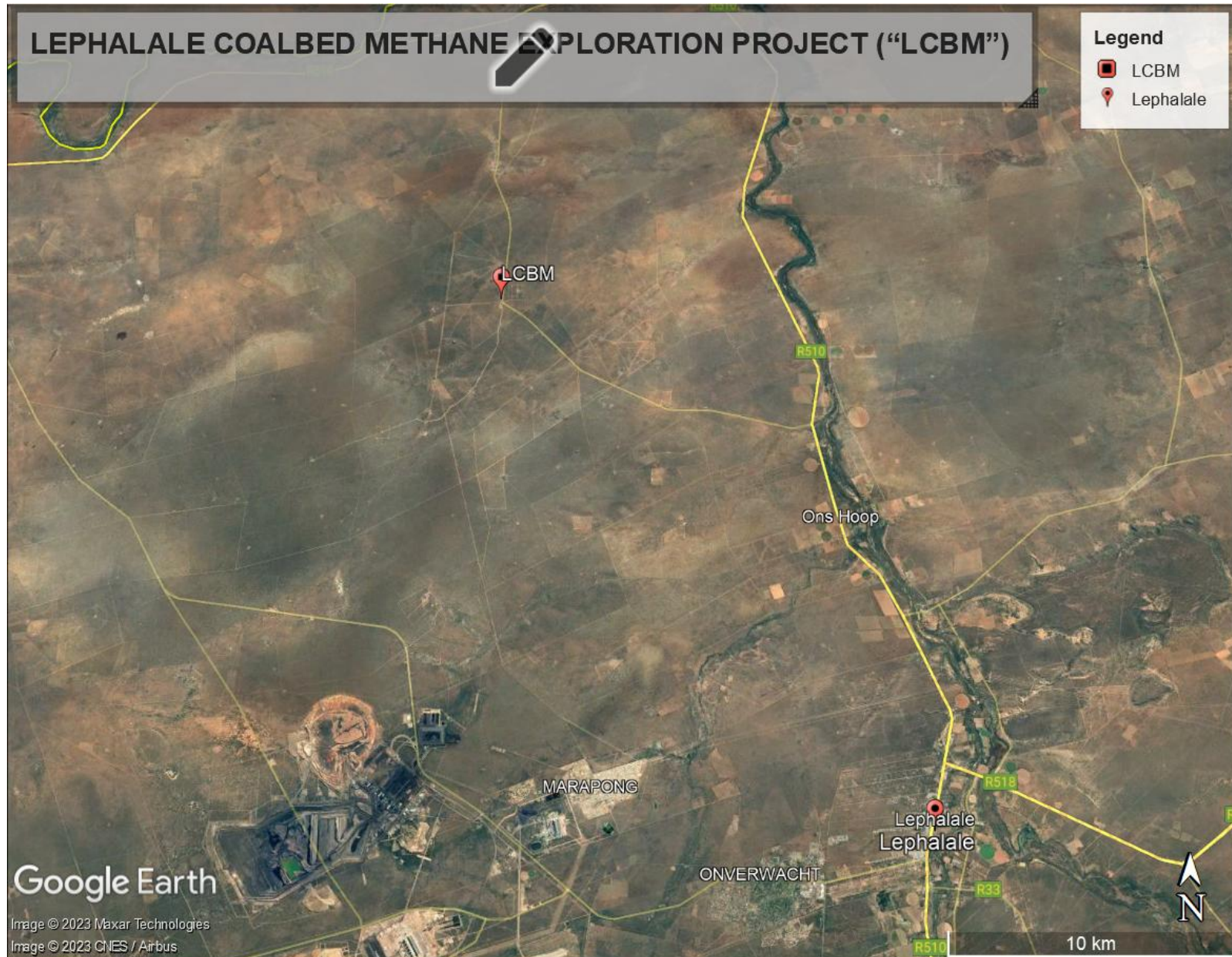


Figure 1: Lephalele Coalbed Methane Exploration Project Location

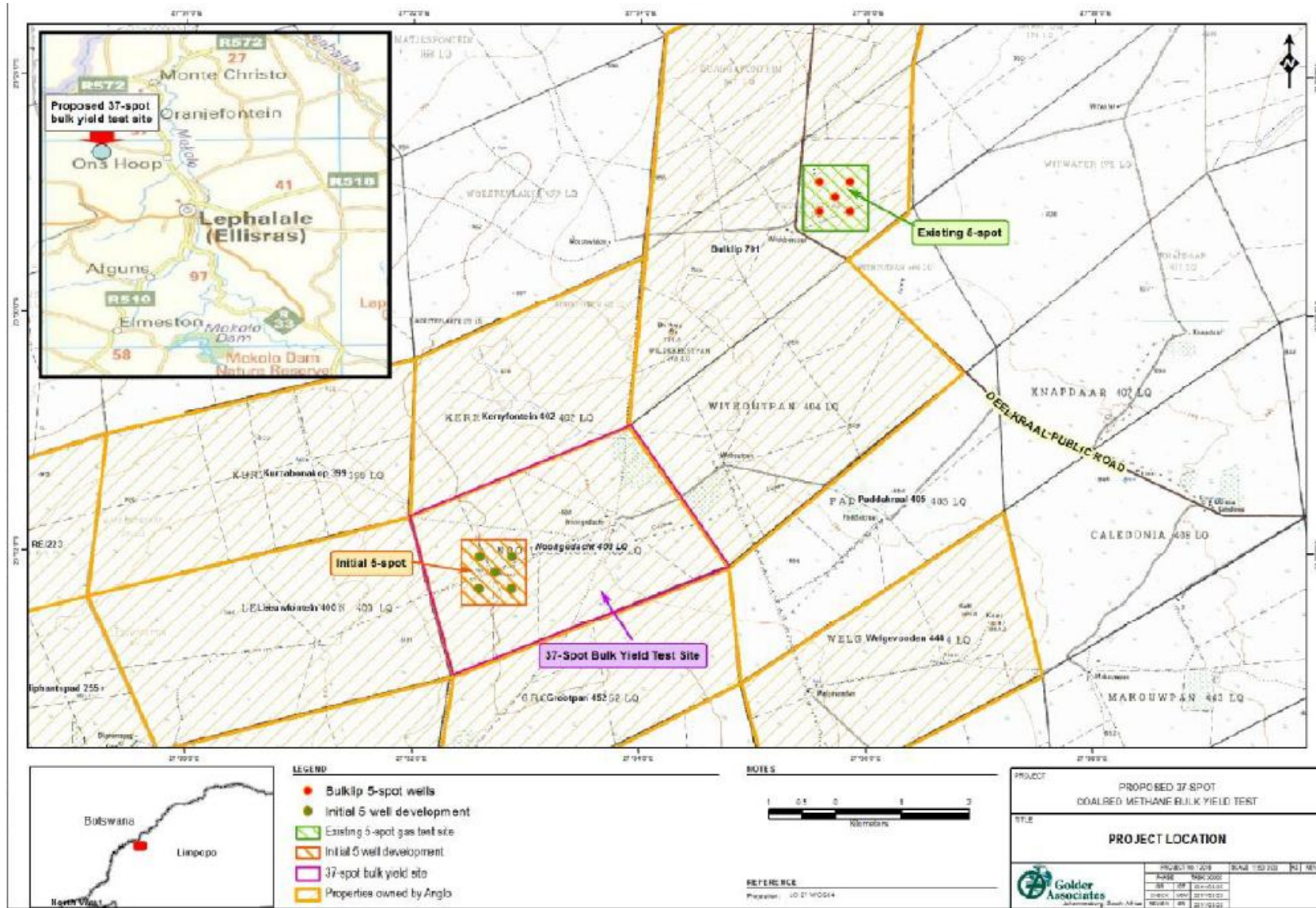


Figure 2: 37-Spot Bulk Yield and 5 Spot Test Sites within the Lephalale Coalbed Methane Exploration Project Locality Map

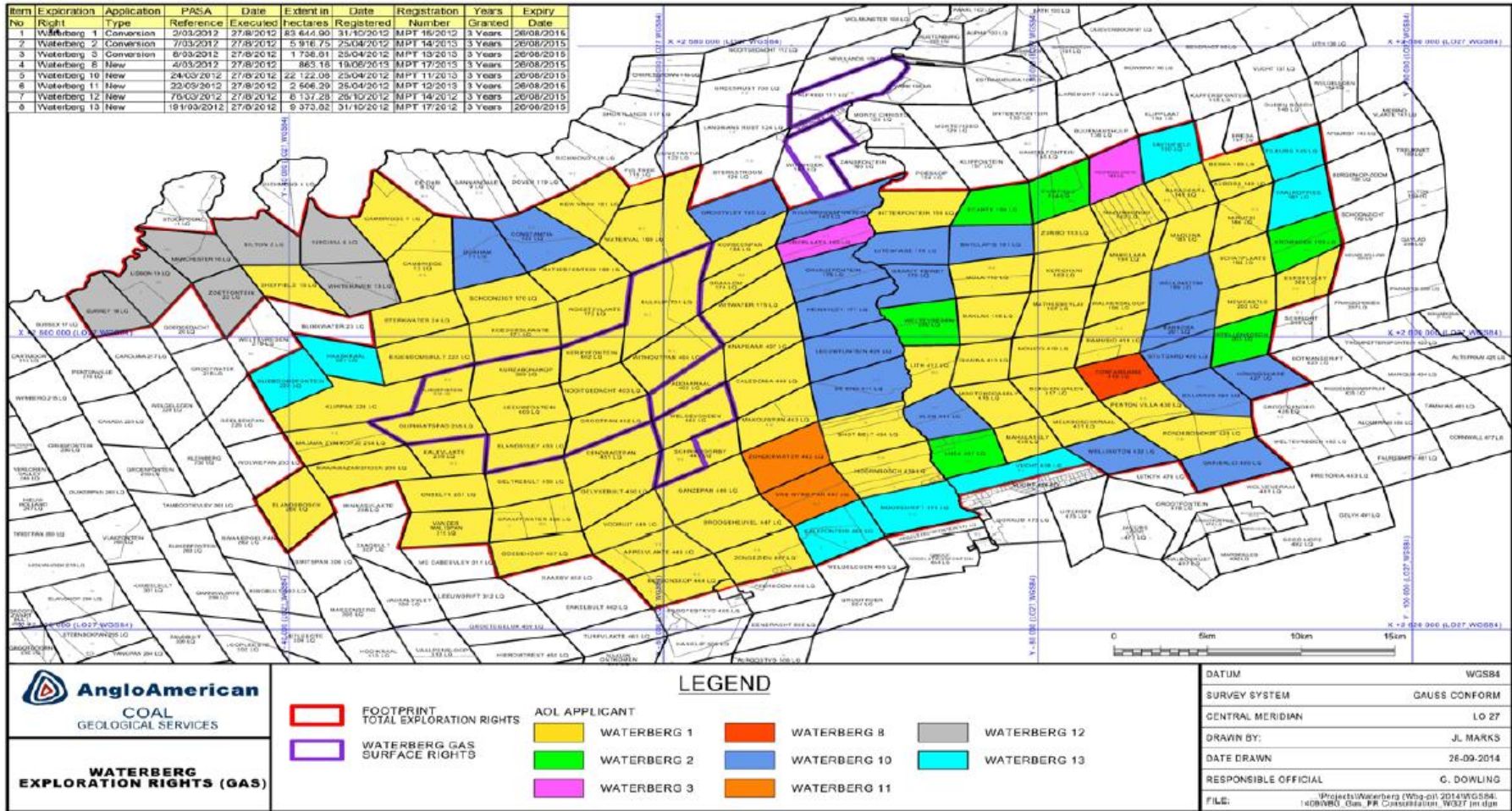


Figure 3: Lephalele Coalbed Methane Exploration Project Exploration Rights (Consolidated Exploration Right EMPr, 2015)

1.2. 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. The 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) states 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. Therefore, as Thungela was in possession of an approved exploration right at the time of the 2014 NEMA EIA Regulations coming into effect, it is safely deduced that Thungela is in possession of an ‘Environmental Authorisation’ (EA).

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. Following from the above, compliance assessments on the approved Environmental Management Programmes for LCBM were assessed and include:

- Standard Environmental Management Programme for LCBM Exploration 5 Spot: Pre-feasibility Production Test Project, dated August 2005 and approved January 2006, with PASA reference No.: 5/2/2/102.
- Proposed 37-Spot Coalbed Methane Bulk Yield Test, approved 12 January 2012, with LEDET Reference Number: 12/1/9-7/1(i)-W1 and amended subsequently by PASA Reference number: 12/3/002 dated, 18 November 2014, 30 June 2017, 30 November 2020.
- Environmental Management Programme for the proposed 37-Spot Coalbed Methane Bulk Yield Test, dated August 2010 and approved September 2015, with PASA reference No.: 12/3/1/02/2/2/1.
- The Waterberg 1 EMPr and Waterberg 11 Consolidated EMPr dated 15 October 2021 (PASA reference No.: 12/3/022/1A).

NTC Group (Pty) Ltd was appointed by Thungela as the independent Environmental Assessment Practitioner (EAP) to undertake the 2024 annual EA and EMPR Compliance Assessments. This report presents the methodologies and findings thereof.

1.3. ASSUMPTIONS AND LIMITATIONS

The following assumptions and/ or limitations are applicable to the audit process and resulting findings:

- This audit is a snap-shot representation of the LCBM exploration operation, and the audit period assessed includes March 2024 – February 2025. Anything occurring prior to this period is assumed to have been audited previously and was thus not included herein. Therefore, such items were determined to be “Not Applicable”.
- Due to the nature and extent of the operation, not all areas were visited during the site assessment. Instead, specific areas representative of the operation and assessment period were selected to provide a demonstration of site operations.
- LCBM exploration operation is under care and maintenance phase, and activities relating to construction, decommissioning, rehabilitation, and/or closure that were not currently occurring on site were deemed “Not Applicable”.
- Procedures developed by LCBM specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System.
- Current/relevant legislation or referenced guideline documents will be substituted for legislation referenced in the EA and or EMPR that is outdated/repealed.

2. AUDITORS

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 Compliance Assessment are provided in **Error! Reference source not found.**, along with the auditor’s declaration of independence.

Table 1: Audit Team Contact Details

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
Lead Auditor	Tanja Bekker (Pr.Sci.Nat) 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
		Email: tanja@ntcgroup.co.za
Auditor	Raisibe Mabiza (Pr.Sci.Nat) is an Environmental Scientist contracted to NTC Group (Pty) Ltd. She has over 10 years' experience in the Environmental field inclusive of experience in the mining sector. Raisibe was responsible for the compilation of the audit report and the review of supporting documentation.	Tel: +27 11 462 2022
		Email: raisibe@ntcgroup.co.za

3. AUDIT METHODOLOGY

3.1. INFORMATION COLLATION AND REVIEW

NTC reviewed the EAs and EMPRs issued to Thungela LCBM 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: LCBM to begin collation and review thereof. The information verified during the audit included *inter alia*:

- Attendance Register Thungela Operations LCBM Project Date 05 March 2024 Yearly SHE Induction.
- (6) Daily Borehole Water Monitoring Sheet_20250101.Xls Water Readings.
- Monthly Water Flow Meter Reading 20250101 Active.Xls Water Readings.
- Waste Register 20250101.Xls Waste Register.

- Water Use Licence in terms of Chapter 4 of the National Water Act (Act 36 of 1998) Section 21 (a), (e) and (g) for LCBM exploration 37-spot Coalbed Methane Bulk Yield Project (ref no. 07/A42J/AEGJA/10044, dated 03/12/2020, as amended on 08/09/2022).
- General Authorisation in terms of Section 40 of the National Water Act (act 36 OF 1998) for Section 21(a) (b) (g) and (j) Water Uses at LCBM exploration 5 spot: Pre-feasibility production test project (Ref: 16/2/7/A400/C43/1).
- Revision of General Authorisation for the taking and storing of water (GN 538 OF 15 April 2016) in terms of Section 39 of the National Water Act (Act 36 of 1998).
- Revision of General Authorisation Regulations (GN 538 OF 15 April 2016) for Section 21 (g) and (j) water uses in terms of Section 39 of the National Water Act (Act 36 of 1998).
- Standard Environmental Management Programme for LCBM Exploration 5 Spot: Pre-feasibility Production Test Project, dated August 2005 and approved January 2006, with PASA reference No.: 5/2/2/102.
- Proposed 37-Spot Coalbed Methane Bulk Yield Test, approved 12 January 2012, with LEDET Reference Number: 12/1/9-7/1(i)-W1 and amended subsequently by PASA Reference number: 12/3/002 dated, 18 November 2014, 30 June 2017, 30 November 2020.
- Environmental Management Programme for the proposed 37-Spot Coalbed Methane Bulk Yield Test, dated August 2010 and approved September 2015, with PASA reference No.: 12/3/1/02/2/2/1.
- The Waterberg 1 EMPr and Waterberg 11 Consolidated EMPr dated 15 October 2021 (PASA reference No.: 12/3/022/1A).
- Thungela LCBM Environmental Emergency Preparedness Procedure dated 25 February 2025.
- Email Communication initiated by Vukosi Tinghiti to Eskom, RE: *LCBM Eskom powerlines - Request for bird Flippers*, dated 13 February 2025.
- Email Communication initiated by Vukosi Tinghiti to Lephalale Local Municipality, *Registration of a fuel storage tank as per municipal By-Laws*, dated 03 November 2024.
- Thungela Grievance and Social Incidents Management Procedure (Doc No. TR.CA.CS.017, dated 30 June 2022).
- NTC Group (Pty) Ltd. (18 July 2024). *Lephalale Coalbed Methane Exploration Project (LCBM) Environmental External Audit Report 2023/2024*.
- NTC Group (Pty) Ltd. (18 July 2024). *Lephalale Coalbed Methane Exploration Project (LCBM) Water Use Licence and General Authorisation External Audit Report 2023/2024*.
- Diesel Tank Specifications.
- Pre-Construction phase photographs.
- Rehabilitation photographs.
- Email submission: Independent external WUL audit report was submitted via email to the DWS on 12 December 2024.
- Quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy, dated

28 January 2025.

- Thungela Resources. (n.d). Thungela Resources Lephalale CBM Exploration Project, Department of Human Settlement, Water and Sanitation, Quarterly Report No. 81 Ref: 16/2/7/A400/C43/1 & WUL: 07/A42J/AEGJA/10044, 1 April 2023 – 30 June 2023.
- Thungela Resources. (n.d). Thungela Resources Lephalale CBM Exploration Project, Department of Human Settlement, Water and Sanitation, Quarterly Report No. 81 Ref: 16/2/7/A400/C43/1 & WUL: 07/A42J/AEGJA/10044, 1 July 2023 – 30 September 2023.
- Thungela Resources. (n.d). Thungela Resources Lephalale CBM Exploration Project, Department of Human Settlement, Water and Sanitation, Quarterly Report No. 81 Ref: 16/2/7/A400/C43/1 & WUL: 07/A42J/AEGJA/10044, 1 October 2023 – 31 December 2023.

3.2. SITE VERIFICATION

The site assessment was conducted on 07 April 2025 by Mary-Anne Carter (NTC), Johan Koekemoer (Thungela: LCBM), Vukosi Tinghisi (Thungela: LCBM) and Caroline Pepermans (Pinsent Masons). During the site assessment, additional documents were collated, and information was verified, LCMB personnel were interviewed and selected areas in the exploration right were visited i.e., verified using photographic evidence presented in Appendix C: Photo Plate.

3.3. ASSESSMENT METHODOLOGY

NTC assessed each of the EA and EMP conditions per 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. RESULTS

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 Thungela LCBM. The full audit details are provided in Table 3, Table 4, Table 5, and Table 6. NTC has included numbering of the commitments 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 the proposed development of 37 Gas Prospecting Wells and associated infrastructure on the farm Nooitgedacht 403 LQ within Lephalale Local Municipality of Waterberg District: Limpopo Province (Ref No: 12/1/9-7/1(i)-W1 dated 25/01/2012)

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
SECTION B. DECISION			
1 ACTIVITIES AUTHORISED			
1.1	Listed in Government Notice R387 of 2006 as: - Activity no. 1 (e) - "The construction of facilities or infrastructure, including associated structures or infrastructure, for any process or activity which requires a permit or license in terms of legislation, pollution, effluent or waste and which is not identified in Government Notice R386 of 2006".	T/N	The condition is noted by Thungela. The LCBM Exploration 37 Bulk Yield Test Project includes the "generation of effluent or waste" which requires the application for a Water Use Licence in terms of the National Water Act (Act 36 of 1998), Section 21 (g): "Disposing of waste in a manner which may detrimentally impact on a water resource." The proposed construction of the brine ponds will store brine by-product from the reverse osmosis plant. A Water Use License has been granted from the Department of Water and Sanitation for water uses 21(a), (e) and (g) (Ref: 07/A42J/AEGHA/10044 dated 03/12/2020 as amended (08/09/2022)).
	Activity no. 1 (g) - "The construction of facilities or infrastructure, including associated structures or infrastructure, for the use, recycling, handling, treatment, storage or final disposal of hazardous waste".	T/N	The condition is noted by Thungela. The LCBM Exploration 37 Bulk Yield Test Project includes the construction of a reverse osmosis in Phase II, which had not yet commenced at the time of the audit. The plant will produce brine effluent during the water treatment process. The brine effluent is a potentially hazardous waste and will be stored on site in appropriately waste receptacles for disposal at a licenced waste disposal facility.
	Activity no. 1 (i) - " The construction facilities or infrastructure, including associated structures or infrastructure, for the extraction or processing of natural gas including gas in natural landfill sites".	T/N	The condition is noted by Thungela. The 37-Spot Project is considered a Research and Development Project. The only infrastructure currently in place as approved in this environmental authorisation are the first five (5) exploration gas wells of the 37-Spot Coalbed Methane Bulk Yield Test, referred to on site as the 2nd 5-Spot Project. At the time of the audit, no exploration activities were conducted.
	<p>The proposed activity entails the development of 37 gas prospecting wells and associated infrastructure on the farm Nooitgedacht 403 LQ within the Lephalale Local Municipality covering an area of approximately 1030 hectares. The development consists of the following:</p> <ul style="list-style-type: none"> - 37 coalbed methane bulk yield test gas wells; - Gas collecting, monitoring, separation and gas scrubber facility; - Reverse osmosis water treatment plant, storage ponds and vapour recompression unit; - 10 megawatt electricity generation facility; - 22 kilovolt overhead electricity line between the project site and the existing 5 Spot trial site. - The line will extend through the project site on the farm Nooitgedacht 403 LQ to the neighbouring farm Klipfontein 233 LQ to the west; - Buried water and gas pipelines linking the gas wells to the water treatment plant and central gas collection facility respectively; - Buried electrical reticulation to the gas wells from the 22 kilovolt power line; - Gas pipelines from the central gas collection and scrubber facility to the 10 megawatt power generation plant; - Buried water and gas pipelines linking the existing 5 spot trial site to the water treatment plant and gas collection facility at the project site; and - Main access gravel road to the project site and minor interval services 		The condition is noted by Thungela. The 37-Spot Project is considered a Research and Development Project. The only infrastructure currently in place, as approved in this environmental authorisation are the first five (5) exploration gas wells (Well 6, Well 7, Well 8, Well 9 and Well 10) of the 37-Spot Coalbed Methane Bulk Yield Test, which are referred to on site as the 2nd 5-Spot Project. These wells were installed to conduct feasibility studies for CBM and have since been sealed. At the time of the audit, no exploration activities were conducted.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	tracks to the gas wells.		
SECTION C. CONDITIONS			
1 SCOPE OF THE AUTHORISATION			
1.1	Authorisation of the activity is subject to the conditions contained herein and is binding on to the holder thereof.	T/N	The condition is noted by the Environmental Authorisation (EA) holder, Thungela Resources (Pty) Ltd (hereafter, Thungela). The authorisation was issued in accordance with the requirements of National Environmental Management Act (NEMA) (Act 107 of 1998) and in terms of the Environmental Impact Regulations (GN R387 of 2006) Activities 1(e), 1(g) and 1(i) which were applicable at the time of the application.
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.	T/N	The condition is noted by Thungela. Thungela understands that they are responsible for all contractors, employees and any person(s) appointed and acting on its behalf. Thungela has appointed NTC Environmental (Pty) Ltd and Pinsent Masons Africa LLP to audit compliance with the Environmental Authorisation, General Authorisation, Water Use Licence and the relevant Environmental Management Programmes (EMPrs).
1.3	The activity authorised may only be carried out at the property as described under location of the activity.	T/N	Thungela understands that the LCBM Exploration 37 Bulk Yield Test Project (Hereafter, LCBM 37-Spot Project) may only be carried out the Farm Nooitgedaght 403 LQ Within Lephalale Local Municipality of Waterberg District: Limpopo Province. No subdivision, sale or consolidation has occurred since the previous audit.
1.4	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 affected. In assessing whether to grant such approval or not, the department may request such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations.	T/N	Thungela understands that it may not make any deviations or changes from the project description authorised in the EA and that any changes that it may require must first be approved by the competent authority.
1.5	This activity must commence within a period of 3 years from the date when the EA was signed. If commencement of the activity does not occur within this period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken. Any request for extension of the validity period of this authorisation should be lodged with the department within sixty (60) days before the expiry date,	C	<p>At the time of the audit, the Environmental Authorisation (EA) for the 37-Spot Project was as follows:</p> <ol style="list-style-type: none"> 1. Environmental Authorisation (12/1/9-7/1(i)-W1) issued by Limpopo: Department of Economic Development, Environmental and Tourism (LDEDEAT) on 25 January 2012 was valid to 25 January 2015. 2. Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. 3. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. 4. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. <p>Bearing in mind that no further extension was applied for after the issuance of the abovementioned extension, which was granted on 30 November 2020, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard,</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			the Thungela LCBM representative advised that the extension applications were done in error.
1.6	This authorisation does not negate the holder of the authorisation's responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	C	<p>Thungela understands that the LCBM 37-Spot Project must comply with all applicable Acts, Ordinance, Regulations and By-Laws, in addition to this EA.</p> <p>The LCBM 37-Spot Project was issued with a Water Use Licence from the Department of Water and Sanitation (DWS) (7/A42J/AEGHA/10044 dated 03 December 2020, as amended on 08 September 2022) in terms of the Chapter for 4 of the National Water Act (NWA) (Act 36 of 1998) for Section 21 water uses 21 (a), (e) and (g).</p> <p>The LCBM 37-Spot Project was also issued in terms of a consolidated Exploration Right (ER) from PASA (12/3/002 dated 25 June 2017).</p> <p>Thungela appoints an independent external auditor to verify its compliance with the conditions of the EA, WUL and EMPs approved in the ER (12/3/002).</p> <p>At the 2nd-5 Spot old farm, dams are present and abstraction boreholes used by the farmers. Should these be utilised for the purposes of the project, it will not be regarded as Schedule 1 water uses and a Water Use Licence will be required.</p> <p>We were advised that, although there are protected areas near the project site, these areas are not directly impacted on by the project.</p>
2 NOTICE OF AUTHORISATION			
2.1	The holder of the authorisation must notify all registered interested and affected parties, in writing and within 10 (ten) calendar days of receiving the department's decision. The notification must: 2.2.1. specify the date on which the authorisation was issued; 2.2.2. inform the interested and affected parties of the appeal procedure provided for in chapter 7 of the Regulations R. 385 of 2006; and 2.2.3. advise the interested and affected parties that a copy of the authorisation and reasons for the decision will be furnished on request.	N/A	The condition falls outside of the audit period.
3 MANAGEMENT OF THE ACTIVITY			
3.1	All mitigation measures included in the Environmental Management Plan (EMP) attached to the EIA Report compiled by Dr, Brent Baxter of Golder Associates Africa dated June 2011 must be implemented and adhered to.	T/N	The condition is noted by Thungela. The Environmental Management Plan (EMPr) compiled by Dr. Brent Baxter of Golder Associates Africa (dated June 2011) is included in the external audit scope and the audit of the EMPr are reported in Table 2: Compliance Audit Findings for the Environmental Management Programme (EMPr) issued for LCBM Exploration 37 Bulk Yield Test Project (12/1/9-7/1(i)-W1). Although the project is not operational, ongoing annual external audits are being conducted.
3.2	Construction workers must be trained on all the mitigation measures outlined in the EMP attached to the EIA Report to ensure minimal impacts on the environment.	T/N	At the time of the audit, no construction activities authorised in the EA were underway. Thungela understands that it must train all construction staff working on its behalf on the mitigation measures outlined in the EMPr.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.3	All relevant approvals required for the development must be in place before commencement of the activities in order to ensure compliance in terms of all relevant legislation.	T/N	<p>The LCBM 37-Spot Project was issued with a WUL from the DWS (7/A42J/AEGHA/10044 dated 03 December 2020, as amended on 08 September 2022) and an Exploration Right from PASA (12/3/002 dated 25 June 2017).</p> <p>At the 2nd-5 Spot old farm dams are present and abstraction boreholes used by the farmers. Should these be utilised for the purposes of the project, it will not be regarded as Schedule 1 water uses and a Water Use Licence will be required.</p> <p>At the time of the audit, the Thungela LCBM representative, confirmed that the first five (5) exploration gas wells were established together with the 37-Spot Coalbed Methane Bulk Yield Test was undertaken within the validity period thus the EA has not lapsed.</p>
3.4	The department reserves the right to monitor and audit the development throughout its full life cycle to ensure that it adheres to all the conditions and mitigation measures included in the EIA Report, Records of monitoring and auditing must be made available for inspection to any relevant authority inspecting the development.	T/N	The condition is noted and Thungela understands that it must cooperate with all requests received from the Department.
4 RECORDING AND REPORTING TO THE DEPARTMENT			
4.1	The applicant must appoint an independent environmental officer to prepare compliance monitoring reports every month during construction and every six (6) months during operation of the approved activity. The reports must indicate how the applicant is complying with each condition in the authorisation These reports must be submitted to the department within fourteen (14) days after the elapse of every month during construction and every sixth month during operation.	T/N	The condition is noted by Thungela. At the time of the audit, no construction activities authorised in the EA were underway.
4.2	The holder of the authorisation must notify the department in writing and within 24 hours, if conditions of his authorisation are not or will not be adhered to. Such notification must be accompanied by reasons for the non-compliance or anticipated non-compliance.	T/N	The condition is noted by Thungela. Thungela understands that they must notify the department in writing and within 24 hours, if conditions of this authorisation are not or will not be adhered to, Thungela notifies the department of compliance with the EA through the submission of audit reports.
5 CONSTRUCTION OF THE ACTIVITY			
5.1	A Water Use License (WUL) for the proposed groundwater abstraction must be obtained from the Department of Water Affairs (DWA) prior construction and operation of the proposed development.	C	<p>The LCBM 37-Spot Project was issued with a WUL from the DWS (7/A42J/AEGHA/10044 dated 03 December 2020, as amended on 08 September 2022) in terms of the Chapter for 4 of the NWA (Act 36 of 1998) for Section 21 water uses 21 (a), (e) and (g).</p> <p>At the time of the audit, no construction activities authorised in the EA and WUL were underway.</p> <p>At the 2nd-5 Spot old farm dams are present and abstraction boreholes used by the farmers. Should these be utilised for the purposes of the project, it will not be regarded as Schedule 1 water uses and a Water Use Licence will be required.</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.2	Waste Management Licence (WML) for the wastewater treatment facility must be obtained from the National Department of Environmental Affairs (DEA) prior construction and operation of the proposed development.	T/N	<p>The condition requires Thungela to apply for a Waste Management Licence (WML) from Competent Authority before commencement of construction and operation. At the time of the audit, no construction activities authorised in the EA and WUL were underway.</p> <p>The application for Environmental Authorisation commenced prior to the promulgation of the Waste Act (Act 59 of 2008) on 1 July 2009, which included Waste Management activities in Schedule 1 which required the application for a WML.</p> <p>The promulgation of the list of waste management activities requiring a WML prompted the repeal of waste related activities listed in the NEMA EIA Regulations (2006) which included the repeal of listed Activity 1(e) in the EIA Regulations amendment (2006) in July 2009. However, transitional arrangements allowed for applications that were pending in terms of the NEMA EIA Regulations (2006) to be dispensed with as if NEMA was not amended. The requirement for a Waste Management Licence was therefore not required in the application made in terms of the NEMA EIA Regulations (2006). However, a Waste Management Licence must be applied for and obtained when a written request is made by the Competent Authority.</p>
5.3	The recycling and reuse of general waste must be incorporated in the WML for the sewage treatment plant lodged with the Department of Environmental Affairs (DEA).	T/N	The condition is noted and Thungela understands it must include recycling and reuse of general waste in the WML application referred to in 5.2.
5.4	All construction activities must cease should there be any new discoveries of archaeological, historical and any site or land of cultural value within the project boundary and Limpopo Heritage Resource Agency (LIHRA) and/or South African Heritage Resource Agency (SAHRA) must be informed immediately.	T/N	<p>At the time of the audit, no construction activities authorised in the EA were underway.</p> <p>Thungela understands that during construction and operation, it must cease activity and inform SAHRA if any archaeological, historical or any site/ land of cultural value is discovered at the project site.</p>
5.5	All the recommendations in the Heritage Impact Assessment report compiled by Dr Julius CC Pistorius must be adhered to.	T/N	<p>The Heritage Impact Assessment (HIA) reported that no artefacts of paleontological, archaeological, historical or cultural value were found at the project site and recommended that operations cease and SAHRA be notified immediately if any heritage resources are exposed during construction and operation.</p> <p>Thungela has not observed any heritage resources at the LCBM 37-Spot Project site. Thungela understands that during construction and operation, it must cease activity and inform SAHRA if any archaeological, historical or any site/ land of cultural value is discovered at the project site.</p>
5.6	Disturbance to the sensitive environment must be restricted to the absolute minimum and areas disturbed as a result of construction must be rehabilitated as soon as possible.	T/N	<p>The condition is noted and Thungela understands that it must restrict disturbance to the sensitive environment and rehabilitated disturbed areas soon as possible.</p> <p>At the time of the audit, no construction activities authorised in the EA were underway.</p>
5.7	In order to minimise the effects of noise, construction activities can only take place from 7h00 to 17h00 weekdays and 7h30 to 13h00 on Saturdays, with the exception of Sundays and public holidays.	T/N	<p>The condition is noted and Thungela understands that it must restrict noise by limiting the construction times in accordance with the hours stipulated in this condition.</p> <p>At the time of the audit, no construction activities authorised in the EA were underway.</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
5.8	Should spillage of any hazardous substance occur during construction, it must be reported to the Regional Director: DWA or his/her representative immediately, within 24 hours of such spillage. Hazardous waste shall then be collected and disposed of at a registered waste disposal facility designed for such particular waste. Only permitted or legally authorised waste collection services must be appointed for the collections of waste from the site to an approved licensed disposal facility.	T/N	The condition is noted and Thungela understands that it must report hazardous spillages to the DWS within 24 hours; dispose hazardous waste at appropriately licenced Hazardous Waste Disposal Facilities and retain copies of the Waste Manifest. At the time of the audit, no construction activities authorised in the EA were underway.
5.9	The hydraulic fluids or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment.	T/N	The condition is noted and Thungela understands that all chemicals used during construction must be stored in banded or concrete lined areas. At the time of the audit, no construction activities authorised in the EA were underway.
5.10	Raw water must be treated to acceptable DWA water quality standards before being discharged into the river. No raw water shall be discharged into the river without being treated.	T/N	The condition is noted and Thungela will comply with the conditions of the WUL (7/A42J/AEGHA/10044) issued by the DWS in relation to its Section 21 water uses. At the time of the audit, no construction activities authorised in the EA were underway.
5.11	Chemical sanitations facilities must be made available for the construction workers. These sanitations must be serviced in a fortnight basis by appropriate companies to avoid spills or leaks on the groundwater or surface water. The content of the facilities must be disposed of at an authorised land fill.	T/N	The condition is noted by Thungela will provide and service chemical sanitation facilities for all workers during construction. At the time of the audit, no construction activities authorised in the EA were underway.
5.12	Under no circumstances shall waste be burned on site. All waste including builder's rubble, generated during the construction and/or operation of the development must be stored, handled and disposed of at an authorized disposal site.	T/N	The condition is noted and Thungela understands that all general waste generated at the site must be stored in appropriate and labelled waste receptacles and be disposed of at Licenced Waste Disposal Facilities. At the time of the audit, no construction activities authorised in the EA were underway.
5.13	Section 28 of NEMA places a duty of care on the applicant (Anglo Operations Limited), to ensure that reasonable measures are taken to prevent pollution or degradation of the environment from occurring, continuing or recurring. Should any environmental damages result from this development or the operation thereof, Anglo Operations Limited must within 14 days of the damage being caused, rectify the situation to its original state; at its (Anglo Operations Limited) own expense.	T/N	The condition is noted and Thungela shall conduct all construction and operations in cognisance of Section 28 of NEMA. At the time of the audit, no construction activities authorised in the EA were underway.
6 OPERATION OF THE ACTIVITY			
6.1	Changes in the project resulting in significant environmental impact are only permissible if approved in writing by the department.	T/N	Thungela understands that it may not make any deviations or changes from the project description authorised in the EA and that any changes that it may require must first be approved by the competent authority. At the time of the audit, no construction activities authorised in the EA were underway.
6.2	Hazardous waste Generated on site must be stored in a closed container and be taken to the registered hazardous landfill site	T/N	The condition is noted and Thungela understands that all hazardous waste generated at the site must be stored in appropriate sealed and labelled waste receptacles; be disposed of at a Licenced Hazardous Waste Disposal Facilities and retain copies of the Waste Manifest. At the time of the audit, no construction activities authorised in the EA were underway.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
6.3	General waste disposal transfer station must be cleaned weekly and monitored in a monthly basis in order to ensure that the impact of odour and storm water run-off is reduced to acceptable level. All waste generated on site during operation of the development must be stored, handled and disposed in an environmentally acceptable manner, and as directed by this department or any other relevant authority.	T/N	The condition is noted and Thungela understands that all general waste generated at the site must be stored in appropriate and labelled waste receptacles and be disposed of and Licenced Waste Disposal Facilities. At the time of the audit, no construction activities authorised in the EA were underway.
6.4	The eco-friendly products such as Organic Compost and/or Effective Micro-organisms must be used to reduce the frequency of application of conventional fertilizers, herbicides and insecticides.	T/N	The Thungela LCBM representative, Mr Pretorius confirmed that no fertilizers, herbicides or insecticides were used at the LCBM 37-Spot Project site. At the time of the audit, no construction activities authorised in the EA were underway.
7 SITE CLOSURE AND DECOMMISSIONING			
7.1	An Environmental Management Plan for site closure and decommissioning of the proposed development must be submitted to this department for approval prior to decommissioning.	T/N	The condition is noted and Thungela understands that it must submit the relevant EMP to the Department for approval prior to closing and decommissioning the site. At the time of the audit, no construction activities authorised in the EA were underway.
8 GENERAL			
8.1.	A copy of this authorisation must be kept at the property where the activity will be undertaken. The authorisation must be produced to any authorised official of the department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.	C	At the time of the audit, an electronic copy of the EA (and amendments) and EMPr was available on Thungela's online "Box" storage system as well as the internal Shared Drive, which all employees have access to.
8.2.	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, the applicant must notify the department as soon as the new details become known to the applicant.	T/N	The condition is noted by Thungela. No changes to contact details, name of the responsible person, physical or postal address and/or telephonic details occurred during the audit period.
8.3.	Non-compliance with a condition of this authorisation may result in criminal prosecution or other actions provided for in NEMA and the Regulations.	T/N	The condition is noted and Thungela understands that non-compliance with the EA is a criminal offence.
AMMENDMENT 1, EXTENSION OF THE VALADITY PERIOD OF THE ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED DEVELOPMENT OF 37 GAS PROSPECTING WELLS AND ASSOCIATED INFRASTRUCTURE ON THE FARM NOOITGEDACHT 403 LQ WITHIN LEPHALALE LOCAL MUNICIPALITY OF WATERBERG DISTRICT: LIMPOPO PROVINCE (REF NO: 12/1/9-7/1(i)-W1 DATED 18/11/2014)			
3.	The Department has reviewed the submission made in this regard and has therefore decided to grant Anglo Operations Limited an extension of the validity period for the Environmental Authorisation as follows.	T/N	The condition is noted by Thungela. The EA (12/1/9-7/1(i)-W1) issued by LDEDEAT on 25 January 2012 was valid to 25 January 2015 at which time construction had not commenced and an amendment to extend the validity of the EA was applied for and granted by LDEDEAT on 18 November 2014 to extend the EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that there was no further extension applied for after the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard,

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			the Thungela LCBM representative advised that the extension applications were done in error.
a)	The validity of the Environmental Authorisation issued on 25 January 2012 has been extended with further 2 years from the date of signature of this letter.	T/N	The condition is noted by Thungela. LDEDEAT approved the extension of the validity of EA (12/1/9-7/1(i)-W1) to 25 January 2015 in the amendment dated 18 November 2014. Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that there was no further extension applied for after the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard, the Thungela LCBM representative advised that the extension applications were done in error.
b)	All conditions as set out in the Environmental Authorisation already issued in respect of the subject proposed development on 25 January 2012 are still legitimate and must be adhered to.	T/N	The condition is noted by Thungela. The authorisation was issued in accordance with the requirements of National Environmental Management Act (NEMA) (Act 107 of 1998) and in terms of the Environmental Impact Regulations (GN R387 of 2006) Activities 1(e), 1(g) and 1(i) which were applicable at the time of the application.
c)	Should the proposed development not commence within the specified period, a new application for Environmental Authorisation must be lodged with the competent authority in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) as amended.	N/A	The condition falls outside of the audit period. Construction had still not commenced by 25 January 2015 and an additional extension of the validity of EA was applied for and approved (see amendment details below in AMMENDMENT 2). Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that there was no further extension applied for after the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard, the Thungela LCBM representative advised that the extension applications were done in error.
d)	Should the proposed activity commence any time after the expiry date, it will be considered to be an illegal activity.	N/A	The condition falls outside of the audit period. Construction had still not commenced by 25 January 2015 and an additional extension of the validity of EA was applied for and approved (see amendment details below in AMMENDMENT 2). Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that there was no further extension applied for after the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			established within the validity period of the original EA and thus the EA has not lapsed. In this regard, the Thungela LCBM representative advised that the extension applications were done in error.
e)	All the interested and/or affected parties reregistered for this project must be notified about this extension and the conditions subject to this, within 14 days of signature of this letter.	N/A	The condition falls outside of the audit period.
4.	The authorised activity must not conflict with the general objectives of Integrated Management laid down in Chapter 5 of NEMA and that any potentially detrimental impacts resulting from the proposed activity can be mitigated to acceptable levels.	T/N	The condition is noted by Thungela.
AMMENDMENT 2. EXTENSION OF THE VALADITY PERIOD OF THE ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED DEVELOPMENT OF 37 GAS PROSPECTING WELLS AND ASSOCIATED INFRASTRUCTURE ON THE FARM NOOITGEDACHT 403 LQ WITHIN LEPHALALE LOCAL MUNICIPALITY OF WATERBERG DISTRICT: LIMPOPO PROVINCE (REF NO: 12/1/9-7/1(i)-W1 DATED 30/06/2017)			
1	Adherence to Regulation 4(2) of the EIA Regulations which provides that you must notify all interested and affected parties in writing within fourteen (14) days form the date of the Department's decision to amend the Environmental Authorisation as well as the provisions regarding the submission of appeals as contained in the National Environmental Management Act (Act 107 of 1998): National Appeals Regulations (Appeal Regulations), 2014 (GN R993).	N/A	The condition falls outside of the audit period.
2	The authorised activity shall not commence within twenty (20) days from the date of signature of the authorisation.	N/A	The condition falls outside of the audit period. At the time of the audit, none of the activities authorised in the EA had commenced and no site preparation nor construction activities have commenced since the EA was issued on 15 January 2012 and was valid to 25 January 2015. However, this did not fall within the audit period. Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that no further extension was applied for after the issuance of the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard, the Thungela LCBM representative advised that the extension applications were done in error.
3	The Minister may, on receipt of appeals against the authorisation or conditions thereof suspend the authorisation against the authorisation or condition thereof suspend the authorisation pending the outcome of the appeals process.	N/A	The condition falls outside of the audit period. No appeals have been received in relation to the LCBM 37-Spot Project EA since the EA was issued on 15 January 2012. It is important to note, that it could not be verified whether I&As were notified of the amendment/extension and as a result a legal appeal process were not possible. The condition is noted by Thungela and any new amendments, new Authorisations or Extensions will be brought to the attention of registered I&APs.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
AMMENDMENT 3. EXTENSION OF THE VALADITY PERIOD OF THE ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED DEVELOPMENT OF 37 GAS PROSPECTING WELLS AND ASSOCIATED INFRASTRUCTURE ON THE FARM NOOITGEDACHT 403 LQ WITHIN LEPHALALE LOCAL MUNICIPALITY OF WATERBERG DISTRICT: LIMPOPO PROVINCE (REF NO: 12/1/9-7/1(i)-W1 DATED 30/11/2020)			
1	Adherence to Regulation 4(2) of the EIA Regulations which provides that you must notify all interested and affected parties in writing within fourteen (14) days form the date of the Department's decision to amend the Environmental Authorisation as well as the provisions regarding the submission of appeals as contained in the National Environmental Management Act (Act 107 of 1998): National Appeals Regulations (Appeal Regulations), 2014 (GN R993).	N/A	The condition falls outside of the audit period.
2	The authorised activity shall not commence within twenty (20) days from the date of signature of the authorisation.	N/A	The condition falls outside of the audit period. At the time of the audit, none of the activities authorised in the EA had commenced and no site preparation nor construction activities have commenced since the EA was issued on 15 January 2012 and was valid to 25 January 2015. Construction had not commenced by 25 January 2015 and an amendment to extend the validity of the EA was granted by LDEDEAT (dated 18 November 2014) to extend EA validity to 25 January 2017. Construction had still not commenced by 25 January 2017 and a second amendment to extend the validity of the EA was granted by Petroleum Agency South Africa (PASA) (dated 30 June 2017) to extend EA validity to 25 January 2020. Construction had still not commenced by 25 January 2020 and a third amendment to extend the validity of the EA was granted by PASA (dated 30 November 2020) to extend EA validity to 25 January 2023. Bearing in mind that there was no further extension applied for after the aforesaid extension, on face value, it appears that the EA has lapsed. However, at the time of the audit, the Thungela LCBM representative, confirmed that the five (5) exploration gas wells as authorised by the 37-Spot Coalbed Methane Bulk Yield Test EA were established within the validity period of the original EA and thus the EA has not lapsed. In this regard, the Thungela LCBM representative advised that the extension applications were done in error.
3	The Minister may, on receipt of appeals against the authorisation or conditions thereof suspend the authorisation against the authorisation or condition thereof suspend the authorisation pending the outcome of the appeals process.	T/N	The condition is noted by Thungela. No appeals have been received in relation to the LCBM 37-Spot Project EA since the EA was issued on 15 January 2012.

Table 4. Environmental Management Programme approved in the Environmental Authorisation for the Proposed Development of 37 Gas Prospecting Wells and Associated Infrastructure on the farm Nooitgedacht 403 LQ within Lephalale Local Municipality of Waterberg District: Limpopo Province (Ref No: 12/1/9-7/1(I)-W1 Dated 25/01/2012).

(EMPr Report Title: Golder Associates (June 2011) Final Environmental Impact Assessment (EIA) and Environmental Management Programme Report (EMPR) for Anglo American Thermal Coal Proposed 37-Spot Coalbed Methane Bulk Yield Test, North of Lephalale, Limpopo Province. Report No. 12016-10676-13. Section 7.5. Construction Phase EMPr (pp 67 - 107).)

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4 SOILS			
4.1 Removal and Modification of Soil and Soil Erosion			
4.1.1	Areas that may be prone to erosion or where signs of erosion are evident (e.g. water trenches) shall be stabilised. Methods of stabilisation include brush-cut packing, mulch or chip cover, straw stabilising, sodding, hydro-seeding, soil binders and physical stabilisation methods such as gabions, reno- mattresses, armour flex or retaining walls.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM understands that it must stabilise any areas where there is evidence of soil erosion in relation to the LCBM 37 Spot Project.
4.1.2	Soil removed for construction activities (clearance for the plant area) shall be stored in a designated area for future rehabilitation measures. The maximum height of the stockpile will be 2 m and erosion protection measures implemented (as above).		
4.1.3	Traffic and movement over stabilised areas shall be restricted and controlled, and damage to stabilised areas shall be repaired and maintained to the satisfaction of the SHEC.		
4.2 Contamination of Soils from Hydrocarbons and Other Chemicals			
4.2.1	Excessive soil contamination by fuel or oil spills will be collected to be treated at a pre-determined and dedicated location, or will be treated in situ using bioremediation, in accordance with AATC's existing procedures.	T/N	<p>These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM understands that the use, handling and storage of hazardous chemicals onsite must be conducted in a manner that prevents contamination of soil and water.</p> <p>There is a bulk diesel storage facility and workshop located southwest of the LCBM Exploration 5 Spot: Pre-feasibility Production Test Project (hereafter, LCBM 5-spot). This facility was installed as part of the LCBM exploration project and authorised in terms of Thungela's Exploration Right (5/2/2/102). The facility was used to service the installation of exploration testing boreholes related to Thungela's Exploration Right, as well as the LCBM 5-spot project (which was operational from 2004-2014). The facility is currently used for maintaining the overall project area as required, specifically relating to the 5-Spot Project where key infrastructure is operational (e.g. RO Plant). The bulk diesel storage facility is not audited as part of this Environmental Authorisation or EMPr, but rather under the 5-Spot Project.</p> <p>The audit of the bulk diesel storage facility and workshop are thus addressed in Table 3: Audit Findings for the LCBM 5-Spot EMPr and Table 4: Audit Findings for the Consolidated Exploration Right EMPr.</p>
4.2.2	Vehicles will be maintained offsite on a regular basis and kept in good working order.		
4.2.3	Vehicle maintenance will not be done on site except in emergency situations in which case mobile drip trays will be used to capture any spills. Drip trays shall be emptied at the existing old oil collection facility at the AACSA Bulkclip Office. Vehicles will be maintained off site on a regular basis and kept in a good working order.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.4	<p>No hazardous materials should be stored on site unless with prior agreement from the SHEC. Contractors must develop method statements for hazardous material storage which must address:</p> <ul style="list-style-type: none"> - Include provisions for proper storage facilities, (i.e. impermeable surface, shall be provided for the storage of oils, grease, fuels, chemicals and other hazardous materials to be used); - The minimum requirement of the Material Safety Data Sheets (MSDS); - The preventative measures to prevent pollution of the surrounding environment from leaks or spillages; - Emergency procedures in the event of misuse or spillage that may negatively affect an individual or the environment; and - The method statement must be submitted to SHEC for approval prior to storing hazardous materials on site. 		
4.2.5	<p>Potentially contaminating materials (such as materials required at the RO plant) shall be stored in enclosed areas, with the minimum containment as per their corresponding MSDS.</p>		
4.2.6	<p>Fuel shall be stored in a secure area in a steel tank supplied and maintained by the fuel suppliers. Leakage of fuel shall be avoided. An adequate bund wall, 110% of the combined container volume, shall be provided for fuel and diesel areas to accommodate any spillage or overflow from these substances. The area inside the bund wall shall be lined with an impervious lining to prevent infiltration of the fuel into the soil.</p>		
4.2.7	<p>Hazard signs indicating the nature of stored materials shall be displayed on the storage facility or container as applicable.</p>		
4.2.8	<p>The storage facilities (including any tanks) shall be surrounded by a bund wall, in order to ensure that accidental spillage does not pollute local soil or water resources.</p>		
4.2.9	<p>The storage areas shall be kept tidy and the area rehabilitated after use if the facility no longer serves any purpose.</p>		
4.2.10	<p>An inventory of hazardous chemicals/substances (including that within equipment) kept on site, along with a description of possible ill effects and treatment of health-related afflictions resulting from accidents, shall be kept in the storage area as well as by the relevant manager. These areas shall be securely fenced.</p>		
4.2.11	<p>A notice board with the contact details of the responsible party shall be displayed at the gate to the storage area.</p>		
4.2.12	<p>Gas welding cylinders and Liquid Petroleum Gas (LPG) cylinders shall be stored in a secure, well-ventilated area. Empty gas cylinders shall be stored separately from full cylinders.</p>		
4.2.13	<p>Cement shall be stored and mixed on an impermeable surface with cement spill containment.</p>		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.2.14	The Contractor is responsible for spill treatment. The individual responsible for, or who discovers a hazardous waste spill, shall report the incident to the SHEC. The SHEC will assess the situation and act as required. In all cases, the immediate response will be to contain the spill. The exact treatment of polluted soil/water shall be determined by the contractor in consultation with the SHEC.		
4.2.15	The contractor shall report spill incidents to the SHEC within 12 hours of its occurrence and the SHEC shall report major spills (level 2 and 3) to DWA within one working day.		
4.2.16	The contractor shall prevent discharge of any pollutants, such as cement, concrete, lime, fertiliser, chemicals and fuels into any water sources or soils.		
4.2.17	Used oil, lubricants and cleaning materials from the maintenance of vehicles and machinery shall be collected in a holding tank and returned to the supplier. Water and oil shall be separated in an oil trap. Oils collected in this manner shall be retained in a safe holding tank and removed from site by a specialist oil recycling company for disposal at an approved hazardous waste disposal site. Oil collected by a mobile servicing unit shall be stored in the service unit's sludge tank and discharged into the safe holding tank for collection by the specialist oil recycling company.		
4.2.18	Drilling fluids will be contained, and drill areas rehabilitated after completion.		
4.3 Soil Pollution Associated with General Waste and/or Sewage			
4.3.1	Solid waste shall be stored in an approved area in covered, tip proof metal drums, preferably skip containers, for collection and disposal.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
4.3.2	A refuse control system shall be established for the collection and removal of refuse to the satisfaction of the SHEC. All waste removed will be recorded in the current waste register in use.		There is no waste generated or chemical toilets stored at the LCBM 37 Spot project site authorised in the EA. Thungela LCBM understands that its waste must be managed in accordance with conditions 4.3. of the LCBM 37 Spot EMPr.
4.3.3	Disposal of solid waste shall be at a Department of Environmental Affairs licenced landfill site or at a site approved by the DEA in the event that an existing operating landfill site is not within reasonable distance from the site.		In general, the area associated with the 37-Spot Project is maintained to a high standard.
4.3.4	No waste shall be burned.		
4.3.5	All building rubble shall be (a) removed from the site and disposed of at an appropriate dumping site, or (b) temporarily stored in a clearly demarcated area on site for future use.		
4.3.6	Littering, discarding or burying of any materials on site shall not be allowed.		
4.3.7	During the construction period, the facilities shall be maintained in a neat and tidy condition and the site shall be kept free of litter.		
4.3.8	Wherever possible, materials used or generated by construction shall be recycled or reused.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.3.9	AATF will review waste management on a quarterly basis with a goal to implement measures to reduce, reuse (for example compost organic waste) and/ or recycle waste.		
4.3.10	Ensure the provision and proper utilisation, maintenance and management of toilet, wash and waste facilities. Chemical toilet facilities supplied by the contractor for the workers shall occur at a minimum ratio of 1 toilet per 10 workers. The chemical toilets will be a dry system that will not require water. The exact location of the toilets shall be approved by the SHEC prior to establishment. All temporary / portable toilets shall be secured to the ground to the satisfaction of the SHEC to prevent them from toppling due to wind or any other cause. As for the chemical toilets at the Bulklip 5-spot trial site, the effluent drum will be emptied once weekly and if required, more often. Chemicals in the effluent drum will be replaced every time after it is emptied. The effluent will be disposed of at the Lephale sewage works.		
5 LAND CAPABILITY			
5.1 Loss of Land for the Plant Area			
5.1	Establish a soil stockpile for rehabilitation purposes, which is clearly designated, no more than 2m high and protected from erosion.	T/N	<p>The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.</p> <p>Thungela LCBM understands that it must clearly demarcate all rehabilitation stockpiles, not allow these to exceed 2 m in height and ensure that they are stabilised.</p>
6 ECOLOGY: FLORA AND FAUNA			
6.1 Clearing of Vegetation			
6.1.1	<ul style="list-style-type: none"> - Vegetative clearance will only be permitted in designated areas; - A method statement will need to be provided to the SHEC should a contractor wish to clear an area, specifying the extent of the area to be cleared, evidence of protected species and methodology for rehabilitation. - The method statement will be subject to SHEC approval. 	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
6.1.2	<ul style="list-style-type: none"> - The SHEC will mark all potentially affected protected trees such as <i>Acacia erioloba</i>, <i>Combretum imberbe</i>, <i>Boscia albitrunca</i>, <i>Scierocarya birrea</i> and <i>Spirostachys africana</i>; and - Contractors will be instructed to avoid all marked trees. Pipelines will be routed around these trees and/or other potentially affected large and/or sensitive vegetation. If routing around protected trees is not feasible, protected trees will be translocated to unaffected areas by a certified ecologist. Where a protected tree needs to be moved, AACSA will apply for a license in terms of the National Forests Act. 	T/N	

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
6.1.3	The outbreak of any uncontrolled fire shall be reported to the site manager immediately and the necessary steps shall be taken to control and extinguish the fire. The area will be included in the existing Emergency Preparedness and Response Procedure (EPRP).	C	Thungela LCBM has developed an Emergency Preparedness and Response Procedure titled <i>Thungela LCBM Environmental Emergency Preparedness Procedure</i> (dated 25 February 2025) to be implemented on site to respond to emergency situations including uncontrolled fires. During interviews with Thungela staff during the audit, it was confirmed that staff conduct fire management for all areas under its ownership, including the LCBM 37 Spot Project Area. Although there are no facilities installed or operational, the potential for veld fires remains a risk that is addressed through Thungela's Emergency Preparedness and Response Procedure.
6.1.4	Smoking shall be prohibited in the vicinity of flammable substances.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway and no construction staff was on site.
6.1.5	Open fires for heating and cooking shall not be permitted.		
6.1.6	The contractor shall ensure that fire-fighting equipment is available on site, in particular where flammable substances are being stored or used.		
6.1.7	Any welding or other sources of heating of materials shall be done in a controlled environment and under appropriate supervision, in such a manner as to minimise the risk of fires and/or injury to staff. In addition, when welding in the field the directly surrounding area will be wetted before starting welding or grinding.		
6.1.8	Rehabilitate the relevant disturbed areas immediately after burying the gas and water pipelines. Natural rehabilitation will be allowed to take place and the progress reviewed for one year. If necessary additional measures will be implemented.		
6.1.9	The contractor shall ensure that energy sources are always available for personnel for heating and cooking purposes. No natural materials may be harvested and burned for the use of cooking or heating.		
6.1.10	No member of the exploration team will be permitted to hunt, kill, set devices to trap, tamper with or harass wild animals and livestock or any form of animal shelter; feed native animals; and bring his/her own pets to the site.		
6.2 Habitat Degradation due to Dust			
As per Section 9		T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
6.3 Habitat Degradation due to Spillage of Potentially Harmful Substances			
As per Section 4.2		T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
6.4 Disturbance of Animals due to Vibration and Noise			
As per Section 10.1		T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
6.5 Collision of Birds with Powerlines			
AACSA to advise ESKOM to install bird flappers on power lines.		C	At the time of the audit, Thungela LCBM had contacted ESKOM to request the installation of bird flappers. However, the bird flappers are yet to be installed as per the requirement of the performance indicator of this condition of authorisation. Thungela LCBM has indicated they have not found any bird in the vicinity of the power lines to indicate that birds are currently being negatively impacted by the power lines within the site. Additionally, Thungela LCBM indicated that there are flappers installed

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
			on some of the 400kV power lines before Nooitgedacht. Thungela LCBM has requested Eskom to install bird flappers on both the 400kV and 22kV powerlines within its property (Email dated 13 February 2025).
7 SURFACE WATER			
	No surface water sources are situated in the vicinity of the proposed site and no direct impacts on surface water are anticipated during the construction phase of the proposed project.	N/A	The condition is noted by Thungela LCBM.
8 GROUND WATER			
8.1 Changes to Quality/ Quantity of Groundwater in surrounding Aquifers during Fracking			
8.1.1	<ul style="list-style-type: none"> - All old exploration boreholes in the vicinity of the 37-spot will be plugged and cemented to the coal seam; and - only biodegradable additions to be utilised for hydraulic stimulation. 	N/A	<p>The condition falls outside of the audit scope.</p> <p>There are 5 existing, sealed boreholes (Well 6, Well 7, Well 8, Well 9 and Well 10) located at LCBM project site which is referred to as the "2nd 5-Spot" (refer to photograph set 1). It was noted during the site inspection that these boreholes have been sealed and cemented.</p>
8.2 Contamination of Groundwater from Construction Equipment and/ or Material Storage			
8.2.1	AATC will implement best international practices, which will reduce the impact on groundwater. This includes cementing of the test wells to isolate them from the overlying geological units (including aquifers) before trial gas extraction commences and routing the abstracted coal seam water to HDPE lined water storage and brine facilities.	T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. The 2nd 5 Spot test wells were cemented and rehabilitated.
9 AIR QUALITY			
9.1 Generation of Nuisance Dust from Open Area/ Movement of Vehicles			
9.1.1	<ul style="list-style-type: none"> - The contractor shall take all reasonable measures to minimise the generation of dust as a result of construction activities to the satisfaction of the SHEC. - The contractor shall be responsible for the control of dust arising from the operations. Dust suppression activities will include wet suppression of roads and earthmoving operations, speed control, covering of trucks transporting dusty materials, and early re-vegetation, and stabilisation of disturbed soil. 	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
9.1.2	If the SHEC finds that dust suppression is required, the following measures will be implemented: Dust on all roads and cleared areas on site shall be controlled by implementing dust suppression measures, such as using water spray vehicles, or the use of a Rain Bird or similar water spray method.		
9.1.3	Water used for dust suppression shall be used in quantities small enough not to generate run-off and cause erosion. Where possible, treated water from the Bulkclip 5 spot site will be used for dust suppression in preference to be abstracting clean water from streams or dams in the area.		
9.1.4	Vehicle speeds shall not exceed 40km/h along gravel (unpaved) roads on site and 20km/h when travelling on unconsolidated tracks and cleared areas.	C	Speed limits were conveyed during induction and signage was noted on site.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
10 NOISE			
10.1 Noise from Construction Vehicles			
10.1.1	The contractor shall endeavour to keep noise and vibration generating activities to a minimum.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
10.1.2	All construction vehicles and machinery used on site shall be kept in good repair to prevent unnecessary noise.		
10.1.3	If applicable, the reverse sirens on vehicles will be replaced with buzzers, since the high-pitched noise of the sirens are annoying and disturbing to humans and animals.		
10.2 Noise Generated from Power Generators and Plant Operations			
10.2.1	<ul style="list-style-type: none"> – AACSA will provide that the detailed plant designs include: A brick enclosure for the power plant; – Silencers for all exhaust systems; Acoustic type ventilation louvers; – Solid core doors lined with a 2mm sheet on the inside of the door to the enclosures; and – Earth berms to be constructed on all sides of the gas turbine site. 	T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. No Noise is generated at the LCBM 37 Spot project area.
11 ARCHAEOLOGY AND CULTURAL HERITAGE			
11.1	<p>Chance find procedures will be developed and distributed to all contractors and workforce in order to reduce the potential for accidental destruction of heritage resources during construction. The procedures will include:</p> <ul style="list-style-type: none"> – An indication of heritage resources to be aware of (prepared by a heritage expert); – Stop work procedures in the event of a find (to be developed by the mine manager); and – Contact details for SAHRA and an accredited archaeologist (ASAPA) who should be contacted in the event of a find. 	T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM will alert SAHRA should any heritage resources be discovered.
12 SENSITIVE LANDSCAPES (Refer to 6.2. Fauna and Flora)			
	As per Section 6.2	T/N	The condition is noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
13 VISUAL ASPECTS			
13.1 Excessive Vegetation Removal and Night Lighting could result in Visual Impacts			
13.1	The minimum vegetation will be cleared around the wells, pipeline and power line routes.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway.
13.2	The use of any night lighting will be avoided as far as possible. If absolutely required, light fixtures that provide low-level, precisely directed illumination will be installed to reduce light spillage beyond the immediate surrounds of the 37-well gas test site.		
13.3	Directional lighting and light shielding will be included on all spot and security lighting.		
14 SOCIO-ECONOMIC			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
14.1 Creation of Employment Opportunities during the Construction Phase			
36.1	AATC has an established employment policy which will be made available to contractors and applied by AATC.	T/N	These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM has not yet appointed a construction contractor for the LCBM 37 Spot Project.
	Make multi-skilling of construction workers a priority, as employment opportunities during construction are only temporary. This would involve identifying skills that may be acquired during construction that can be built upon or supplemented through limited additional training to equip workers for jobs that would become available during the operational phase of the Project. This could be either through the Project itself or through Corporate Social Investment initiatives that may be undertaken by AACSA in the area.		
14.2 H&S of Employees and Surrounding Residents from Construction Activities			
14.2.1	A complete issue-based risk assessment shall be done prior to commencing work. This assessment will be supplemented by continuous risk assessments carried out on a daily basis. Both will be done in the prescribed AACSA format and will be supplied to the contractor as part of the AACSA contractors' pack.	T/N	<p>These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM has not yet appointed a construction contractor for the LCBM 37 Spot Project.</p> <p>Thungela LCBM understands that it must conduct and manage health and safety during construction in accordance with conditions listed in 14.2 of the LCBM 37 Spot EMPr as well as the relevant requirements of the Occupational Health and Safety Act (Act 85 of 1993).</p>
14.2.2	Workers shall be made aware of the health and safety risks associated with the work to be carried out; this will be achieved through attendance of the one-day site specific SHE induction prior to entering site. Proof of induction must be clearly displayed by all workers at all times (as per AACSA Fatal Risk Standards).		
14.2.3	Weekly safety meetings and daily toolbox talk meetings will be held to make all workers aware of any SHE risks.		
14.2.4	All workers shall be required to obtain a medical fit for work certificate prior to entering site. This certificate will be a condition of employment.		
14.2.5	The AACSA Safety Way, AACSA Fatal Risk Standards and AACSA Golden Rules will be adhered to, and compliance shall be ensured through monthly planned inspections and ad hoc unplanned inspections. In addition, Planned Task Observations and Visible Felt Leadership inspections shall be carried out by all supervisors on an ongoing basis.		
14.2.6	Workers shall be equipped with adequate personal protective equipment (PPE), e.g. equipment providing protection from the sun.		
14.2.7	Construction vehicles shall be clearly identified as working of the contractor or AATC.		
14.2.8	Workers shall be issued with identification card to identify them as working for the contractor or AATC. Workers shall wear their identified cards in a visible manner at all times when in the Project area.		
14.2.9	Construction vehicles travelling in the area shall obey speed limits and traffic laws.		
14.2.10	Hazardous materials shall be transported, stored, used and disposed of in the correct manner, as described in Section 4.2 above.		
14.2.11	All visitors are to report to the site office for the sign in procedure and visitors' induction.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
14.2.12	The contractor will ensure that the members of the exploration team have access to some form of medical treatment for minor injuries (e.g. a first aid kit) and to a clinic/ hospital if injuries are of a more serious nature (the contractor will obtain these details before commencing activities). The nearest clinic is in Lephale.		
14.2.13	The contractor shall maintain and update all safety records in the supplied AATC Contractors Pack.		
14.2.14	Potable water will be supplied to the site and will be abstracted from the boreholes at the farmhouse. If no tapped source is available, fresh water will be brought to site by containers daily.		
14.3 Community Reception and Responses			
	Open liaison channels shall be established and maintained between the proponent, the contractors and interested and affected parties, so that any queries, complaints or suggestions can be dealt with quickly and by the appropriate person(s).	C	During the audit, it was noted that the cell phone numbers of the Thungela staff members were placed on the gate entrances to the site. We further take note of the indication from the Operation Staff that the best method of communication is telephonically, due to the remoteness of the operation. This said, during the audit, no evidence was available to indicate communication lines between Thungela and Interested & Affected Parties. However, Thungela LCBM indicated that a Community WhatsApp Group has been established and it includes all adjacent farm owners. Additionally, Thungela LCBM has in place the <i>Thungela Grievance and Social Incidents Management Procedure</i> (Doc No. TR.CA.CS.017, dated 30 June 2022) which outlines the protocol used by the site to investigate complaints.
	The SHEC shall use the Projects established complaints register to record/ register all complaints relating to the activities. The SHEC shall use the established protocol relating to the steps that would be followed once a complaint has been received. The protocol shall cover at least the following steps: registration, investigation, reporting, follow-up action and close out. This protocol shall be maintained by the operator once the activity is operational.	C	During the audit, a complaints register was observed at the Thungela LCBM gate. Further to that, Thungela LCBM indicated that a Community WhatsApp Group has been established and it includes all adjacent farm owners. Additionally, Thungela LCBM has in place the <i>Thungela Grievance and Social Incidents Management Procedure</i> (Doc No. TR.CA.CS.017, dated 30 June 2022) which outlines the protocol used by the site to investigate complaints.
	Any complaints from the community will be recorded in an incident and complaint book and will be attended to immediately.	C	During the audit, a complaints register was observed at the Thungela LCBM gate.
	Any disputes will be directed to and handled by the appointed liaison officer (e.g. Site Manager) for resolution.	T/N	The condition has been noted by Thungela LCBM. Thungela LCBM has in place the <i>Thungela Grievance and Social Incidents Management Procedure</i> (Doc No. TR.CA.CS.017, dated 30 June 2022) which outlines the protocol used by the site to investigate complaints and details where disputes must be directed.
	Any impact such as noise, dust, bright lights, etc. which may cause disturbance to the surrounding landowners/land users/residents or any person lawfully living in the vicinity, will be kept to a minimum.	T/N	The condition is noted and Thungela LCBM understands that it must keep disturbances to a minimum. At the time of the audit, no construction activities authorised in the EA were underway.
	The contractor and his team will maintain good relations with the surrounding communities by respecting their lifestyles.	T/N	The condition is noted and Thungela LCBM understands that its activities must not infringe upon the surrounding communities. At the time of the audit, no construction activities authorised in the EA were underway.
14.4 Staff Training			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
14.4.1	<p>As part of the induction programme, staff shall be educated and made aware of the appropriate "Code of Conduct", which will include the following: AACSA Standards: AACSA Safety Way, AACSA Fatal Risk Standards, AACSA Envi. Way, Golden Rules & Project specific operating procedures/ policies; Do not destruct any animals and/or plants; Do not hunt, kill, set devices to trap or harass wild animals and/or livestock; Do not tamper with or destroy nesting sites, lairs or other animal shelters; Do not feed any animals; Do not leave site untidy/ strewn with rubbish which will attract animal pests; Do not bring any pets to the construction site; Do not trespass on private properties; Do not carry a weapon on the site or in vehicles transporting workers; Do not set any fires at the construction site; Do not cause unnecessary, disturbing noise at site; Do not remove or destroy vegetation at the site without prior consent; Immediate and decisive action shall be taken will this occur. Do not tamper, destroy or remove vegetation from areas fenced off or marked; Do not pollute livestock watering points; Do not tamper with boreholes or borehole mechanisms; Report leaking pipelines immediately; Do not litter along the roadsides, public and private roads; Always keep to demarcated roads; Do not drive any vehicle under the influence of alcohol; Do not exceed the speed limits on public roads; Do not drive a vehicle which is generating excessive noisy; Ensure safe access to main road and obey road rules; Do not defecate indiscriminately. Only defecate in chemical toilet facilities; Do not steal any crops and animals from surrounding properties.</p>	T/N	<p>The condition has been noted by Thungela LCBM. At the time of the audit, no construction activities authorised in the EA were underway. Thungela LCBM has thus not yet appointed a construction contractor or construction staff for the LCBM 37 Spot Project. Thungela LCBM understands that it must conduct training of all staff employed in relation to the LCBM 37 Spot Project.</p>
14.5 Community Perceptions and Responses			
	<p>Open liaison channels shall be established and maintained between the Proponent and Interested and Affected Parties, so that any queries, complaints or suggestions can be dealt with quickly and by the appropriate person(s).</p> <p>The SHEC shall establish complaints register to record / register all complaints relating to the Activities. The SHEC shall develop a protocol relating to the steps that would be followed once a complaint has been received. The protocol shall cover at least the following steps: registration, investigation, reporting, follow-up action and close out. This protocol shall be maintained by the operator once operational.</p> <p>Any complaints from the community will be recorded in an incident and complaint book and will be attended to immediately.</p> <p>Any disputes will be directed to and handled by the appointed liaison officer (e.g. Site Manager) for resolution.</p> <p>Any impact such as noise, dust, bright lights, etc. which may cause disturbance to the surrounding landowners/land users/residents or any person lawfully living in the vicinity, will be kept to a minimum.</p> <p>The contractor and his team will maintain good relations with the surrounding communities by respecting their lifestyles.</p>	N/A	<p>Please not that this section is a repetition of Section 14.3 above.</p>
15 TRAFFIC AND TRANSPORT			
15.1 Construction Vehicles			
15.1	<p>The access roads shall have storm water drainage channels to prevent</p>	T/N	<p>These conditions are noted by Thungela LCBM. At the time of the audit, no construction activities</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	<p>soil erosion.</p> <p>Transport routes to and within the site and construction areas shall be clearly demarcated prior to use. Any deviations from the principal road plan must be cleared with the SHEC.</p> <p>All privately owned access routes on site will be continually checked for actual or potential erosion sites (especially after rain) and wear. Erosion problems will be repaired immediately. Repair may involve backfilling and contouring, seeding and the appropriate placement of sack/rock gabions to control further erosion.</p> <p>Privately owned access routes within the Project area will be maintained adequately in order to minimize dust, erosion or undue surface damage.</p>		<p>authorised in the EA were underway. Thungela LCBM understands that it must maintain access roads in accordance with Condition 15.1 of the LCBM 37-Spot EMPr when it commences construction.</p>

Table 5: Environmental Management Program for the Waterberg Coal Bed Methane Pre-feasibility 5 Spot Test approved in terms of the Exploration Right issued by PASA (REF NO. 5/2/2/102).

EMPr Report Title: GCS (Pty) Ltd (August 2005). Addendum to Standard Environmental Management Programme (SEMP). Waterbed Coalbed Methane Pre-Feasibility 5-spot test. Ref No. 04.06.289. Part B.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
1 ENVIRONMENTAL AWARENESS			
1.1	The National Environmental Management Act, 1998 (Act 107 of 1998) states that any cost incurred to remedy environmental damage shall be borne by the person responsible for that damage (polluter pays principle). It is therefore imperative that the contractor reads and understands the requirements of this EMP before commencing activities.	T/N	<p>The condition is noted by Thungela LCBM. The CBM Pre-feasibility: 5 Spot Test Project (hereafter, "5-SPOT") was constructed and operational from 2004 to 2014. The 5-SPOT project site ceased operations in 2014 and has since been in a state of care and maintenance.</p> <p>During the site inspection conducted on 07 April 2025, it was noted that all infrastructure was still in place (5 gas wells, water and gas above and below ground pipes, Reverse Osmosis (RO) plant, 4 lined ponds and the calcrete dam). Photograph Set 1 - 5. However, none of these facilities were operational, nor was there any water contained in the dams.</p> <p>As per the feedback received during the interviews with Thungela staff, the plant is not expected to be operational in future and the existing infrastructure is planned to be removed via auctioned.</p>
1.2	Chapter 7 of the National Environmental Management Act, 1998 (Act 107 of 1998) states that everyone is required to take reasonable measures to ensure that they do not pollute the environment. Reasonable measures include informing and educating employees about the environmental risks of their work and training them to operate in an environmentally acceptable manner. In terms of this the contractor will meet with the prospecting team to explain the environmental requirements of this EMP and all sub-contractors will be briefed.	C	<p>Thungela undertakes sufficient measures to prevent environmental pollution. The following measures were noted during the audit:</p> <ul style="list-style-type: none"> - No evidence of pollution was noted at the project site during site inspection. - Environmental Induction and Awareness Training is completed regularly to contractors and the auditors were provided with the attendance registers for the Induction training of staff members (dated 05 March 2024). - Thungela appoints external auditors to conduct audits of its valid EA, EMPs and IWUL. External audit Reports were compiled by NTC Group (Pty) Ltd dated February 2025.
2 GENERAL REQUIREMENTS			
2.1 Animals			
2.1.1	No member of the prospecting team will be permitted to hunt, kill, set devices to trap, tamper with or harass wild animals and livestock or any form of animal shelter.	C	<p>The 5-SPOT project was completed in 2014 after adequate data collection and no further exploration testing has since been conducted. There is no exploration (previously referred to as "prospecting") team. The site is currently in a state of care and maintenance. The care and maintenance of the site includes the protection of game that are present within the area. Furthermore the 5-SPOT site is fenced and has a locked gate to prevent entry of animals. Thungela has appointed Rudi van Wyk as the Game Farm Manager.</p>
2.1.2	No member of the prospecting team will be permitted to feed native animals.	C	
2.1.3	No member of the prospecting team will be permitted to bring his/her own pets to the site.	C	
2.1.4	Avoid attracting animal pests by keeping the site free of litter and by providing adequate waste receptacles that can be covered to prevent access by animal pests.	C	
2.2 Dust			
2.2.1	The excavation, handling and transport of erodible materials under windy conditions, or when a visible dust plume is evident, will be avoided, as high wind speeds will exacerbate erosion.	T/N	<p>The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. No waste excavation, handling and transport of erodible materials is undertaken at the site.</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.2.2	Soil stockpiles will be revegetated to ensure that they are not exposed to the erosive effects of wind and to control erosion.	C	No evidence of non-compliance was observed during the site visit on 07 April 2025. The berms were partially revegetated with grass and stable to prevent erosion.
2.2.3	A 200m buffer zone of vegetation will be maintained around the site as the vegetation barrier will act as a barrier to the movement of wind and therefore reduce the erosion of the exposed surfaces.	C	During the site visit on 07 April 2025, it was confirmed that the area surrounding the project site was adequately vegetated (refer to photograph set 3).
2.2.4	Exposed surfaces will be revegetated as soon as possible (i.e. as soon as activities are completed at the site).	T/N	The condition has been noted and Thungela LCBM understands that all exposed surfaces must be revegetated as soon as activities are completed at the site. The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance.
2.2.5	Vehicle speeds will be restricted to a maximum of 30 km/h along gravel (unpaved) roads and 20 km/h when traversing unconsolidated tracks and cleared areas.	C	Speed limits were conveyed during induction and signage was noted on site.
2.2.6	Vehicles will keep to the roads and tracks.	C	During the site visit, the auditor observed demarcated roads and tracks for vehicles. No non-compliance was observed during the audit period.
2.2.7	Only the minimum amount of vegetation necessary to allow activities to take place will be stripped (vegetated surfaces are less prone to erosion). An area of approximately 20 m x 20 m has been cleared around each well, an area of 250 m x 250 m was cleared around the water treatment plant and flare stack.	C	During the site visit, the areas cleared around each exploration well, flare stacks and ponds was observed to fall within the 20 m x 20 m specification and well managed.
2.2.8	Appropriate dust suppression measures will be used when dust generation is unavoidable e.g. dampening with water. Caution must be employed not to allow muddy conditions to develop due to excessive watering.	N/A	The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. There are thus no dust generating activities at the site that require dust suppression. No issued pertaining to dust were noted during the site inspection conducted on 07 April 2025.
2.3 Noise			
2.3.1	As a general guideline, exploration hours is limited to 06h00-18h00 to avoid sleep/rest disruption and general disturbance of adjacent land users/residents. However, once the 5-Spot Test wells are operational, pumping and analyses will be carried out on a 24 hours per day, 7 days a week basis. Silent electric pumps will be used during the operations.	N/A	The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. No equipment or infrastructure is operational at the site and there are thus no noise generating activities at the project site, as confirmed during the site inspection conducted on 07 April 2025.
2.3.2	Neighbouring landowners/land users/residents will be alerted 1 month before commencing drilling activities in order to eliminate the surprise element.		
2.3.3	A vegetation buffer of at least 200m will be maintained around the drilling site, as the vegetation buffer will aid in dissipating the noise generated at the site.		
2.3.4	Equipment to be regularly & systematically checked, maintained and repaired (exhaust systems) as poorly maintained equipment can generate disturbing and unnecessary noise.		
2.3.5	The prospecting team will be made aware of minimising unnecessary noise such as hooting and shouting.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.3.6	If applicable, the reverse sirens on vehicles will be replaced with strobe lights (the high-pitched noise of the reverse sirens are annoying and disturbing).		
2.4 Groundwater			
2.4.1	The monitoring programme will be maintained in order to quantify any possible impact. Details regarding this monitoring programme are provided in Table 4-1.	C	Thungela LCBM maintains the groundwater monitoring programme provided in Table 4-1 and submits quarterly water quality monitoring reports to the Department of Water and Sanitation. It must be noted that the wastewater storage ponds and RO treatment plant have not been operational since project completion in 2014. At the time of the audit all dams were empty. Please refer to Photograph set 3.
2.4.2	Additional monitoring boreholes will be drilled on site when required, in order to monitor the effect of CBM production.	T/N	The condition has been noted by Thungela LCBM. The wastewater storage ponds and RO treatment plant have not been operational since project completion in 2014.
2.4.3	Should the results of the monitoring programme indicate that CBM production has an impact on groundwater levels or quality, Anglo Coal will provide the affected user with an alternative source of water of equal quantity and quality. Present indications and monitoring shows that only one private borehole (WN2) is being affected by the five-spot test, although no impacts have yet been identified – this is due to the use of the borehole by the on-site project team, for drinking water purposes. Anglo Coal will implement environmentally responsible operating practices, which will reduce the impact on groundwater. This includes sealing CBM production wells from the overlying geological units (including aquifers) before CBM production starts, lining flowback water storage ponds with SABS approved HDPE liners, implementing a water treatment facility with which to treat coal seam water and disposing of the brine produced in a responsible manner.	T/N	The condition has been noted by Thungela LCBM.
2.5 Access Roads			
2.5.1	The absolute minimum vegetation will be cleared around the wells, water treatment plant, the flare stack and the access roads. An area of approximately 20 m x 20 m will be cleared around each well, and area of 250 m x 250 m will be cleared around the water treatment plant and flare stack. Vegetation will be cleared in an 'organic' manner avoiding sharp geometric lines which would leave a long term unnatural 'scar' on the landscape. All existing natural vegetation will be retained near the office complex. Much of the vegetation along the western edge of the site will be maintained to act as a visual buffer and the water treatment plant and office complex will be set as far back from the Deelkraal Road as is possible.	C	During the site visit, the areas cleared around each exploration well, flare stacks and ponds was observed to fall within specifications as stipulated in this condition and are well managed.
2.5.2	Access roads will require an effective dust suppression management programme, such as regular watering. This is especially relevant throughout the life of the project, as the roads will remain as dirt roads.	N/A	The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. No equipment or infrastructure is operational at the site and there are thus no dust generating activities at the project site, as confirmed during the site inspection conducted on 07 April 2025.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.5.3	The use of unnecessary night lighting that could cause glare and spotlight effects, will be avoided. Light fixtures that provide precisely directed illumination will be installed to reduce light spillage beyond the immediate surrounds of the office complex and wherever else lighting may be required. High pole top flood and security lighting will be avoided.	N/A	The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. No night lighting is currently used at the 5 SPOT project site.
2.5.4	The flare stack will be designed at the lowest possible height above ground level keeping safety and the risk of fire under consideration.	N/A	The condition falls outside the audit period. The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. The flare stack infrastructure was still in place onsite, although not operational and was approximately 1.3 m in height.
2.6 Handling Hazardous Material			
2.6.1	All potentially hazardous materials that will be stored or used on site will be handled in such a manner as to avoid soil and water contamination.	C	During the site inspection on 07 June 2025, it was noted that the chemicals used for treatment at the osmosis plant while the site was operational (Hydrochloric and Sulphuric Acid) had not yet been removed from the site (refer to photograph set 2). These were however contained in an adequately banded and locked cage.
2.6.2	Potentially hazardous materials will be stored in a lockable, mobile structure on an impermeable surface.		
2.6.3	Brine generated by the Reverse Osmosis Plant will be disposed of by means of a gas-fired combustion evaporator followed by natural evaporation of the brine concentrate stored in two of the HDPE lined storage ponds located adjacent to the RO plant.	N/A	The condition falls outside the audit period. The 5-SPOT project site ceased operations in 2014 and has since been in a state of care and maintenance. During the site inspection conducted on 07 April 2025, it was noted that the RO plant was not operational and the 4 lined ponds did not contain any brine/ treated water.
2.6.4	The maintenance of vehicles and equipment or handling of oil/grease/hazardous chemicals must be conducted on an impermeable surface, such as a concrete slab or PVC lining/plastic sheeting. This also applies to the storage of equipment.	N/A	The 5-SPOT project site ceased operations in 2014 and has since been in a state of care and maintenance. Thungela LCBM has a workshop which is used for vehicle maintenance and storage of bulk chemicals. The workshop is audited within the ambit of the Consolidated EMPr for Waterberg 1 and 11 as approved in terms of Thungela's LCBM Mining Exploration Right (Table 4).
2.6.5	Generators used on site will be placed on an impermeable surface to prevent the contamination of the underlying surfaces. Drip trays will be used due to the mobility of most of the generators, thus ensuring that contamination, if any, does not spread.	N/A	The 5-SPOT project site ceased operations in 2014 and has since been in a state of care and maintenance. Thungela LCBM makes use of a generator at its staff accommodation facility, referred to as Homestead. However, Homestead is not located nor used in relation to the 5-SPOT project area and is thus audited within the ambit of the Consolidated EMPr for Waterberg 1 and 11 as approved in terms of Thungela's LCBM Mining Exploration Right (Table 4).
2.6.6	Any accidental or negligent spills of hazardous materials will be cleaned up immediately. The area of contaminated soil will be removed and disposed of at a suitable permitted waste site. The affected area will be treated with suitable absorbents such as Drizit or Peat Sorb or similar (the contractor will ensure that such products are kept on site).	C	There is no use or handling of hazardous material at the 5-SPOT project area since the site is not operational. While there are old chemicals still left on site from the RO treatment plant, these were stored in a locked cage which was banded. During the site inspection, no non-compliance observed with regards to accidental or negligent spills of hazardous material was observed at the access roads.
2.6.7	In the event of a spillage of an identified hazardous substance, the incident will be reported to DWAF and other relevant Government departments informed within 24 hours.	T/N	The condition is noted and Thungela LCBM understands that it must report hazardous spillage to DW&S within 24 hours. Thungela LCBM staff indicated that no spillage incidents have occurred at the 5-SPOT project site.
2.7 Waste Management			
2.7.1	All working areas must be cleared of litter and other domestic waste on completion of the day's work.	T/N	The 5-SPOT project was completed in 2014 and the site is currently in a state of care and maintenance. During the site inspection it was confirmed that no general or hazardous waste is generated, handled or

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.7.2	Adequate waste receptacles will be provided on site.		stored at the 5 SPOT project site and no waste receptacles are required.
2.7.3	It is not anticipated that any hazardous waste will be generated at the site. All used oil will be stored in an appropriate drum and will either be collected by or delivered to Lephalale Brandstof for recycling. These materials and containers will be stored on an impermeable surface until such time as they are collected for recycling.		
2.7.4	Drums are provided on site so that non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc. can be collected/stored until it can be transported away from the site to the Lephalale permitted waste disposal facility. It is essential that the drums are cleared regularly and preferably be covered to prevent access by pest animals. Precautions will be taken to prevent any refuse from spreading from the site.		
2.7.5	Domestic waste will not be burned on site but will be collected and disposed of at the registered municipal waste site.		
2.7.6	Biodegradable refuse generated on the site will be handled as above.		
2.8 Worker Conduct			
2.8.1	Don't hunt, kill, set devices to trap or harass wild animals and livestock.	N/A	<p>The 5-SPOT project was completed in 2014 after adequate data collection and no further exploration testing has since been conducted. There is no exploration (previously referred to as "prospecting) team. No construction workers, contractors or operational staff are employed at the site.</p> <p>The site is currently in a state of care and maintenance. The care and maintenance of the site includes the protection of game that are present within the area. Furthermore the 5-SPOT site is fenced and has a locked gate to prevent entry of animals.</p>
2.8.2	Don't tamper with or destroy nesting sites, lairs or any other form of animal shelter.		
2.8.3	Don't feed the native animals.		
2.8.4	Don't leave construction site untidy/ strewn with rubbish, which will attract animal pests.		
2.8.5	Don't bring your pets to the construction site.		
2.8.6	Don't repass on private properties not linked to the project.		
2.8.7	Don't carry a weapon on the site or in the vehicles transporting workers to and from the site.		
2.8.8	Don't start fires at the site (a braai area wis available at staff accommodation site).		
2.8.9	Don't cause disturbing noise at the site and at any worker collection/drop off points.		
2.8.10	Don't drive any vehicle under the influence of alcohol.		
2.8.11	Don't exceed speed limits on public roads or exceed the internal speed limit.		
2.8.12	Don't drive a vehicle that is generating excessive noise.		
2.8.13	Don't drive off demarcated roads.		
2.8.14	Don't litter along the roadsides, including both the public and private roads.		
2.8.15	Don't remove or destroy vegetation at the construction site without prior consent.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.8.16	Don't tamper with, destroy or remove vegetation from fenced or make areas.		
2.8.17	Don't pollute livestock watering points.		
2.8.18	Don't tamper with boreholes or borehole mechanisms.		
2.8.19	Report leaking pipelines immediately.		
2.8.20	Ensure safe access to the main.		
2.8.21	Reward workers who comply with the environmental requirements by using incentives.		
2.9 Labour and Safety			
2.9.1	Where possible and practical, contractors will endeavour to employ local labour (e.g. for site rehabilitation, site clean-up, etc.).	N/A	The 5-SPOT project was completed in 2014 after adequate data collection and no further exploration testing has since been conducted. There is no exploration (previously referred to as prospecting) team. No construction workers, contractors or operational staff are employed at the site.
2.9.2	All workers on site will be required to wear and be supplied with the necessary safety equipment e.g. hard hats / bump caps, glasses, dust masks and ear plugs, where applicable (this will depend on the task being undertaken).		
2.9.3	Contractors will ensure that members of the prospecting, operating and maintenance teams have access to some form of medical treatment for minor injuries (e.g. a first aid kit) and to a clinic/hospital if injuries are of a more serious nature (the contractor will obtain these details before commencing activities). The nearest clinic is in Lephale.		
2.9.4	Any dangerous working areas and activities will be internally fenced off to protect workers and visitors.		
2.9.5	All visitors are to report to the site office for the registration and induction procedure prior to entering the 5-spot site.		
2.10 Community Liaison and Improvement			
2.10.1	Any impact such as noise, dust, bright lights, etc., which may cause disturbance to the surrounding landowners/land users/residents or any person lawfully living in the vicinity, will be kept to a minimum.	N/A	The 5-SPOT project was completed in 2014 after adequate data collection and no further exploration testing has since been conducted. There is no exploration (previously referred to as prospecting) team. No construction workers, contractors or operational staff are employed at the site. The site is currently in a state of care and maintenance.
2.10.2	Contractors will maintain good relations with the surrounding communities by respecting their lifestyles.		
2.10.3	Any disputes will be directed to and handled by the appointed liaison officer (e.g. Project Geologist) for resolution.		
2.10.4	Any complaints from the community will be recorded in an incident and complaint book and will be attended to immediately.	C	During the audit, a complaints register was observed at the Thungela LCBM gate. Further to that, Thungela LCBM indicated that a Community WhatsApp Group has been established and it includes all adjacent farm owners. Additionally, Thungela LCBM has in place the Thungela Grievance and Social Incidents Management Procedure (Doc No. TR.CA.CS.017, dated 30 June 2022) which outlines the protocol used by the site to investigate complaints.
2.10.5	Public meetings will be held periodically to allow Interested and Affected Parties the opportunity to express their concerns if any, and as a means for Project Managers to convey relevant information about the operations.	NC 001	During the audit, no evidence of interaction with I&APs or public meetings were provided. Although the site is not operational, communication lines and procedures are important considering that the Thungela LCBM is sharing mutual access roads, fences and farm properties with surrounding farmers. LCBM has indicated that they have created a WhatsApp group that includes all the I&APs as a communication method.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
2.11 General			
2.11.1	Fires will only be allowed in the specially demarcated braai area at the office complex or equipment specifically constructed for this purpose.	C	During the audit, the braai area was found to be in good condition. No evidence of open fires was observed within the site.
2.11.2	The site will be maintained in a clean and tidy state at all times.	C	While the 5 SPOT project site is not operational, the site is adequately maintained in terms of care and maintenance.
3 INFRASTRUCTURE REQUIREMENTS AND OPERATIONAL PROCEDURES			
3.1 Access Routes			
3.1.1 Establishment of Access Routes			
3.1.1.1	Access roads to drilling sites will be established in consultation with the landowner. There is dual access to the site from the Deelkraal Road via locked gates, thereby ensuring controlled and secured access to and from the site.	N/A	<p>These conditions fall outside of the audit period.</p> <p>The majority of access routes used within the project area were previously established by farmers (landowners). When these farms were purchased by Thungela (or rather AATC at the time of purchase), these existing access routes continued to be utilised. New access routes specifically related to the 5 SPOT project were created to access the location of gas wells and RO Plant. During the site inspection, the farm that the 5 SPOT project is located within was fenced with a locked gate. Furthermore, the 5 SPOT project area had its own fencing and a locked gate and the 4 ponds had a separate fence and locked gate. The access routes were observed and were found to be in good condition and kept to the minimum servitude.</p>
3.1.1.2	Existing tracks and roads will be used, where practicable.		
3.1.1.3	Should access routes or a portion thereof have to be newly constructed to the routes will be planned beforehand to ensure a sequential pattern and to avoid haphazard traversing of the target area.		
3.1.1.4	Should access routes or a portion thereof have to be newly constructed the routes will be planned to follow the contours of the land where possible. Diagonal roads will be avoided as far as possible.		
3.1.1.5	Should access routes or a portion thereof have to be newly constructed the routes will be so selected that a minimum number of trees are felled for this purpose and fence lines be followed as far as possible. Grassed areas (as opposed to scrub and thicket) will be followed as grasslands recover more rapidly and easily from vehicle tracks;		
3.1.1.6	Should access routes or a portion thereof have to be newly constructed, where new temporary access routes are created, the herbaceous vegetation will not be cleared beforehand. Over time the vegetation will become trampled by the passage of vehicles and tracks will develop, however, the presence of the vegetation will reduce the risk and severity of erosion problems. By not clearing the vegetation it will also accelerate the rehabilitation of these routes.		
3.1.2 Use of Access Routes			
3.1.2.1	Reasonable speeds (less than 20 km/h on tracks; less than 30 km/h on gravel roads) will be observed to avoid accidents, excessive noise, dust and injury to livestock, game and wildlife.	C	Speed limits were conveyed during induction and signage was noted on site.
3.1.2.2	The erection of gates in fence lines and the open/closed status of gates in new and existing positions will be clarified with the landowner and maintained throughout the prospecting period.	N/A	The condition falls outside the audit period.
3.1.3 Maintenance of Access Routes			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.1.3.1	Newly constructed access routes within the prospecting area will be maintained adequately in order to minimize dust, erosion or undue surface damage.	C	The 5-SPOT project was operated from 2004 - 2014 and the site is currently in a state of care and maintenance. There are no contractors or employees at the site, nor any activities or operations. No dust is generated at the site as verified during the site inspection. Thungela LCBM relied largely on access roads created for prior farming activities. It was confirmed during interviews with LCBM staff that site inspection (visual checks of access roads) are on-going and repair/ maintenance undertaken as required. All access routes including those created to access the 5-Spot Project site were noted to be in fair condition during the site inspection with no evidence of erosion was observed.
3.1.3.2	There is no effective runoff from the farm tracks, therefore no runoff and storm-water control measures will be implemented.	C	
3.1.3.3	All new access routes will be routinely checked for actual or potential erosion sites (especially after rain) and wear. Erosion problems will be repaired immediately. Repair may involve backfilling and contouring, seeding and the appropriate placement of sack/rock gabions to control further erosion.	C	
3.1.3.4	The contractor will ensure that any regional and provincial roads used during the project must be kept in good working order by: Limiting the number of passages by heavy vehicles.	N/A	These conditions falls outside the audit period.
3.1.3.5	The contractor will ensure that any regional and provincial roads used during the project must be kept in good working order by: Maintaining reasonable speeds and avoiding reckless driving so as to reduce wear of the roads.		
3.1.3.6	The contractor will ensure that any regional and provincial roads used during the project must be kept in good working order by: Repairing any damage or erosion directly linked to the prospecting activities. A maintenance programme for the Deelkraal Road will be implemented by the mine.		
3.2 Site Offices			
3.2.1 Siting and Layout			
3.2.1.1	The farmhouse is currently used as a site office.	C	The condition refers to Nooitgedacht offices which were still in use at the time of the audit.
3.2.1.2	The siting of the site offices will be planned beforehand.	N/A	The condition falls outside the audit period.
3.2.1.3	Minimum area necessary to enable the necessary tasks to be carried out will be selected.	N/A	The condition falls outside the audit period.
3.2.1.4	Site office area will be defined and activities will be confined to the demarcated area.	C	The Nooitgedacht offices are still in use and comply with this obligation.
3.2.1.5	Site office to be sited and fenced in consultation with the surrounding landowners.	N/A	The condition falls outside the audit period.
3.2.2 Access			
3.2.2.1	The farmhouse is situated directly next to the Deelkraal road and is thus easily accessible.	C	The condition is noted and correct.
3.2.2.2	The site office will have a double entrance/exit point.	C	The dual access road was verified during the site inspection.
3.2.2.3	Where possible, use will be made of existing roads to avoid creating new access routes.	C	Thungela LCBM relied largely on the existing access roads. Refer to 3.1.2.1.
3.2.2.4	Access routes will be maintained and to minimise dust, erosion and wear.	C	During site inspection, the access roads observed were in fair to good condition.
3.2.3 Site Clearing			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.2.3.1 Vegetation			
3.2.3.1.1	Vegetation will not be unnecessarily disturbed and trees and shrubs will, as far as is practicable, not be damaged or felled.	N/A	The condition falls outside the audit period.
3.2.3.1.2	Herbaceous vegetation will only be removed from those areas where soil is to be stripped. Refer to Section 3.2.3.2.1 Soil Stripping.	N/A	The condition falls outside the audit period.
3.2.3.1.3	Invasive plants/clumps of invasive plants within the site area will be removed (ensure that the clearing of these plants does not encourage further spread of the invasive species).	NC 002	The LCBM Staff advised that during the vegetation clearing, only alien invasive trees were removed. It was noted that the area had a significant encroachment of alien and invasive species, notably, <i>Senegalia mellifera</i> (Blackthorn), <i>Terminalia sericea</i> (Cluster leaf) and <i>Dichrostachys cinerea</i> (Sicklebush). Currently no AIP Programme is in place on site and significant invasion of these species and bush encroachment were observed. Refer to Photograph Set 1. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.
3.2.3.1.4	For aesthetic and ecological reasons, large trees within the site area will be left intact. The site layout will be planned to accommodate the large trees, where applicable.	C	No indigenous trees were moved or altered during vegetation clearing. The LCBM Staff advised that during the vegetation clearing, only alien invasive trees were removed.
3.2.3.1.5	To minimise the disturbance of important plant communities and prevent fragmentation of natural vegetation, ensure that continuous belts of natural vegetation remain intact. Access routes will be planned to avoid traversing directly through these communities and rather circumvent such areas where possible.	C	Previously cleared areas are now covered by grass, but devoid of indigenous shrubs and trees. The succession of indigenous trees is also hindered by the presence of game that favour open grasslands and woodland edges. Refer to photograph set 6.
3.2.3.1.6	No trees or shrubs will be felled or damaged for the purpose of obtaining firewood.	C	The site is not operational and is in state of care and maintenance. The site is fenced to prevent access to public.
3.2.3.2 Soil			
2.2.3.2.1 Soil Stripping			
3.2.3.2.1.1	Soil (and similar vegetation cover) will be stripped from all areas underlying permanent or semi-permanent structures, or areas that will be susceptible to contamination, so as to guarantee a source of material for site rehabilitation. A soil depth of approximately 1m will be stripped. Soil and vegetation will not be unnecessarily removed.	N/A	The condition falls outside the audit period.
3.2.3.2.1.2	The topsoil layer (approximately top 0.2 – 0.3m) will be stripped first and stockpiled (the biological and chemical characteristics of the topsoil differ from the subsoil and are more suitable for the growth and development of vegetation so it is important that it is stripped and stored separately). Approximately 0.7 – 1m of subsoil will then be stripped and stockpiled separately from the topsoil. In total, approximately 1m of soil will be stripped and stockpiled for later use during rehabilitation.		No soil, subsoil stripping or excavation is conducted. The LCBM 5 Spot Project was completed in 2014 and the area has since been under care and maintenance. During the audit the vegetation cover and rehabilitation was found to be in adequate state of succession. No stockpiles were observed.
3.2.3.2.1.3	To avoid wasting material that can be used for site backfilling, contouring and rehabilitation, any other available soil material will be excavated and stockpiled.		
3.2.3.2.1.4	Excavated material will be stockpiled, levelled and revegetated.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<i>2.2.3.2.2 Soil Handling</i>			
3.2.3.2.2.1	Do not handle soils during windy conditions as this will exacerbate the loss of soil through wind erosion.	T/N	The condition is noted and Thungela understands that it must not handle soils during windy condition.
<i>2.2.3.2.3 Soil Stockpiling</i>			
3.2.3.2.3.1	A site for the soil stockpiling will be selected that is: away from the working area - so that the stockpiles will not be disrupted by site activities;	T/N	No stockpiles were observed during the audit. The condition is noted and Thungela understands that soil stockpiles must be located away from the working area to prevent disruption of site activities.
3.2.3.2.3.2	A site for the soil stockpiling will be selected that is in a sheltered position - so that the soil will not be exposed to the effects of erosion;	T/N	No stockpiles were observed during the audit. The condition is noted and Thungela understands that soil stockpiles must be sheltered to prevent exposure to erosion.
3.2.3.2.3.3	A site for the soil stockpiling will be selected that is away from areas of valuable vegetation or plant specimens - so that the clearing of valuable plants or communities is not required;	T/N	No stockpiles were observed during the audit. The condition is noted and Thungela understands that soil stockpiles must be located away from areas of valuable vegetation or plant specimens.
3.2.4 Services/ Facilities			
3.2.4.1	An adequate number of waste receptacles will be supplied around the site to gather all domestic refuse and to minimise the occurrence of littering.	N/A	<p>These conditions fall outside the audit period.</p> <p>There is currently a permanent toilet, septic tank and French drain at the 5-SPOT project site. The 5 Spot Test Project was constructed and operational from 2004 to 2014. The 5-SPOT project site ceased operations in 2014 after adequate data collection and no further exploration testing has since been conducted and has been in a state of care and maintenance.</p> <p>As per the feedback received during the interviews with Thungela staff, the plant is not expected to be operational in future and the existing infrastructure is planned to be removed via auctioned. The chemical toilets are currently stored in the yard and utilised during drilling operations, however, no drilling was conducted during the audit period.</p>
3.2.4.2	Potable water will be abstracted from the boreholes close to the farmhouse.		
3.2.4.3	Potable water will be supplied to the site. If no tapped source is available, fresh water will be brought to site by containers daily.		
3.2.4.4	Adequate cooking and sanitary facilities will be provided.		
3.2.4.5	Gas or electricity will be used for cooking purposes on site, so that it is not necessary for the surrounding vegetation to be felled for use as a fuel source.		
3.2.4.6	Two portable chemical toilets will be provided at the site. Chemical toilet facilities will be used and sited on the site in such a way that they do not cause water or other pollution. The chemical toilets will be a dry system that will not require water. Chemicals will be replaced in the drum each time the drum is cleaned out, which is expected to occur on a weekly basis. The effluent will be disposed of at the Lephalale municipal sewage works.		
3.2.5 Handling Hazardous Materials			
3.2.5.1	All potentially hazardous materials stored or used on site will be handled in such a manner as to prevent soil and water contamination.	NC 003	During the site inspection on 07 April 2025, it was noted that the chemicals used while the site was operational had not yet been removed from the site. These were however contained in an adequately banded and locked cage. However, spillages were observed adjacent to the banded area resulting in

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.2.5.2	Any accidental or negligent spills of potentially hazardous materials, which could have an effect on water or soil quality, will be cleaned up immediately. In the event of such a spill, the incident will be reported to DWAF immediately. The area of contaminated soil must be removed and disposed of at a suitable permitted waste site. The affected area will be treated with suitable absorbents such as Drizit or Peat Sorb or similar (Anglo Coal will ensure that the contractor will ensure that such products are kept on site).		soil contamination.
3.2.5.3	Potentially hazardous materials must be stored in a lockable, mobile structure on an impermeable surface.	C	Refer to 3.2.5.1.
3.2.5.4	The maintenance of vehicles and equipment or handling of oil/grease/hazardous chemicals will be conducted on an impermeable surface, e.g. concrete slab or PVC lining/plastic sheeting. This also applies to the storage of equipment.	N/A	No maintenance of vehicles and equipment or handling of oil/grease/hazardous chemicals is conducted at the LCBM 5 spot area since the site ceased operations in 2014 after adequate data collection. The project area is in a state of care and maintenance.
3.2.5.5	The fuel will be stored at the farmhouse and will be placed within a secure, bounded area, which has a capacity two times the storage volume of the tanks to contain any spillage.	NC 004	<p>Fuel is stored at the farmhouse. A 30m³ Diesel tank is in place at the Storage Area and this tank contains about 28m³ diesel but has a capacity of 30m³.</p> <p>During the audit, acceptable storage of Diesel with signage was observed at the workshop and bulk diesel storage area. The provided diesel tank specification confirms that the tank is made up of an internal fuel storage tank (rectangular design), this internal tank is surrounded by an external tank (or skin) providing the 'self-bunded' functionality of the design. However, the diesel tank specification does not confirm whether the bounded area has the capacity two times the storage volume of the tanks to contain any spillage.</p> <p>Registration of this facility in terms of the local municipal by-laws are also required. It is noted that communication was established with the local municipality regarding the registration of a fuel storage tank, as indicated in an email dated 03 November 2024, however, no permit or further evidence of engagement has been provided.</p>
3.2.6 Waste Management			
3.2.6.1	All working areas must be cleared of litter and other domestic waste on completion of the day's work.		The 5-SPOT project is not operational and does not employ any staff but is periodically accessed by maintenance staff that that conduct care and maintenance. There is thus no waste generated at the site.
3.2.6.2	Adequate waste receptacles will be provided on site.		
3.2.6.3	Flammable, toxic or poisonous materials and the containers must not be disposed of with the domestic waste and must be transferred to an appropriate and permitted disposal site. These materials and containers must be stored on an impermeable and bounded surface until they can be collected and transferred to the disposal site.	N/A	
3.2.6.4	A drum will be provided at the site so that non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., can be collected/stored until it can be transported from the site to a permitted disposal facility. It is essential that the refuse drum be cleared regularly and preferably be covered to prevent access by pest animals. Precautions will be taken to prevent any refuse from		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	spreading from the site.		
3.2.6.5	Domestic waste will not be burned on site.		
3.2.6.6	Biodegradable refuse generated on the site will be handled as above.		
3.2.7 Erosion			
3.2.7.1	Disturbed areas will be rehabilitated as soon as possible after completion of activities.	C	During the audit the vegetation cover and rehabilitation was found to be in adequate state of succession.
3.2.7.2	Monitoring for actual or potential erosion sites will be conducted.	C	No erosion was noted during the site inspection.
3.2.7.3	Rehabilitation of erosion sites will be undertaken by backfilling erosion cavities with stockpiled subsoil material.	N/A	No erosion was noted during the site inspection.
3.3 Drilling Sites			
3.3.1 Siting Criteria			
3.3.1.1	The location of the drilling sites will be planned beforehand.	N/A	These conditions fall outside the scope of the audit as the site was operation between 2004 to 2014.
3.3.1.2	The minimum area necessary to enable tasks to be carried out will be selected.		
3.3.1.3	The drilling site area will be within the 5-Spot game fenced area and activities will be confined to the demarcated area.		
3.3.1.4	Initial drilling sites will be sited on a practical basis after consultation with the surrounding landowners/land users/residents.		
3.3.2 Access to Drilling Sites			
3.3.2.1	The requirements listed under Section 3.2.2 apply.	C	Condition 3.2.2. refers.
3.3.3 Site Clearing			
3.3.3.1	The requirements listed under Section 3.2.3 apply.	C	Condition 3.2.2. refers.
3.3.4 Services			
3.3.4.1	Waste receptacles will be provided at each drilling site to gather all waste and minimise the occurrence of littering. Separate waste receptacles for domestic and hazardous waste will be provided.	N/A	These conditions fall outside of the audit period.
3.3.4.2	Two portable chemical toilets will be provided at the drilling site. Chemical toilet facilities will be used and sited in such a way that they do not cause water or soil pollution. The chemical toilets will be a dry system that will not require water. Chemicals will be replaced in the drum each time the drum is cleaned out, which is expected to occur on a weekly basis. The effluent will be disposed of at the Lephale		The site was operation between 2004 to 2014. The site has since been in a state of care and maintenance.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	municipal sewage works.		
3.3.4.3	The use of existing facilities will be done in consultation with the surrounding landowners/land users/residents.		
3.3.5 Liquid Effluent Management			
3.3.5.1	Four 30 x 30 x 2 m storage ponds will be excavated adjacent to the RO plant. Each pond will be lined with SABS approved HDPE liner for the storage of flowback water, brine and coal seam water generated at the drilling sites.	N/A	<p>These conditions fall outside of the audit period.</p> <p>The site was operation between 2004 to 2014. The site has since been in a state of care and maintenance. The ponds and RO treatment plant are not operational and were empty at the time of the audit. The pond lining was observed to be intact. Integrity of the liners were, however, not audited as part of the scope of the External Audit. Refer to photograph set 3.</p>
3.3.5.2	All wastewater storage ponds on site will be drained by pumping the liquid to the RO plant for treatment. On closure, linings will be removed and disposed of at a permitted waste disposal facility.		
3.3.5.3	When excavating these ponds, the topsoil and the subsoil will be stripped and stockpiled separately (refer to Section 3.2.3).		
3.3.5.4	The pits will be surrounded by an earth wall of at least 30 – 50 cm in height and constructed to withstand the impact of heavy rainfall, if necessary.		
3.3.6 Handling Hazardous Materials			
3.3.6.1	In order to contain non-biodegradable oil and fuel spills, drip pans or a PVC lining will be provided for mobile drills.	N/A	<p>These conditions fall outside of the audit period.</p> <p>The site was operational between 2004 to 2014 and has since been in a state of care and maintenance. The 5-SPOT site does not employ any staff but is periodically accessed by maintenance staff. There is thus no use of, or handling of hazardous materials or drilling at the site.</p>
3.3.6.2	Any spills will be cleaned up immediately by removing the spill together with the polluted soil and disposing of it at a registered disposal facility to the satisfaction of the Director: Mineral Development and the Sub-Director DWAF: Waste Management.		
3.3.6.3	When using hazardous materials at drilling sites all potentially hazardous materials will be handled in such as manner as to prevent soil and water contamination.		
3.3.6.4	When using hazardous materials at drilling sites the handling of oil/grease/hazardous chemicals will be conducted on an impermeable surface, e.g. PVC lining/plastic sheeting (oil to be recovered/recycled).		
3.3.6.5	When using hazardous materials at drilling sites generators used on site will be placed on an impermeable surface to prevent contamination of the underlying surfaces.		
3.3.6.6	When using hazardous materials at drilling sites accidental or negligent spills of potentially hazardous materials will be cleaned up immediately (follow procedure in Section 2.6).		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
3.3.6.7	All hazardous materials will be stored at the site office and machinery repairs will be conducted at the drilling sites in the prescribed manner (refer to Section 2.6).		
3.3.7 Waste Management			
3.3.7.1	All waste generated at the drilling sites will be collected and transferred to the site office for storage before being disposed of. All domestic waste, biodegradable waste and non-biodegradable waste will be disposed of at the Lephalale municipal waste facility and all used oil, fuel, grease and the contents of drip pans will be recycled.	N/A	The 5-SPOT project is not operational and does not employ any staff but is periodically accessed by maintenance staff that conduct care and maintenance. There is thus no waste generated at the site.
3.3.7.2	Drilling waste (including mud, concrete and rock cuttings) will be cleared from the sites and disposed of appropriately. The waste will not be disposed of in the borehole.		
4 REQUIREMENTS OF FINAL REHABILITATION			
4.1 Infrastructure			
4.1.1	On completion of the 5-Spot Test and pre-feasibility study, all structures or objects within the operating site will be death in accordance with section 40 of the Minerals Act, 1991 and to the satisfaction of the Minister.	N/A	These conditions fall outside of the audit period. The 5-Spot Test and pre-feasibility project was completed in 2014.
4.1.2	All temporary storage, office, water treatment plant and ablution structures will be disassembled and removed from the site.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.1.3	All concrete structures (e.g. concrete bounding slabs) will be broken up and the concrete fragments transported to the Lephalale waste disposal site.		
4.1.4	All wastewater storage ponds on site will be drained and the liquid treated in the Reverse Osmosis Plant. All solid waste will either be capped or transferred to a permitted disposal facility. Should the waste be removed, the linings of these ponds will also be removed and disposed of in the same manner.		
4.1.5	Should it be decided that the removal of the waste is the best environmental option, the excavations will be backfilled with subsoil, compacted and levelled using the stockpiled topsoil. No foreign matter such as sealed or other rubble will be introduced into such backfilling.		
4.1.6	Waste (concrete, litter, domestic waste, scrap metal, plastic sheeting, containers, etc.) from the site will be collected and taken to the Lephalale municipal waste site. No waste will be buried on site with the possible exception of the concentrated brine ponds and other biodegradable waste, if agreed to by the landowner.		
4.1.7	All unused materials, equipment and implements will be packed up and removed from the site.		
4.1.8	All portable chemical toilets will be removed from site and any voids associated with the ablution facilities will be backfilled, contoured and revegetated.		

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.1.9	Any gate or fence made or erected by the applicant, which is not required by the landowner, will be removed. Fences/gates will be disassembled and the components removed from the site.		
4.1.10	Any private fences/gates that have been disturbed during the prospecting programme will be repaired.		
4.2 Boreholes			
4.2.1	All boreholes will be covered and made safe by means of a concrete cap, unless otherwise determined by the Director: Mineral Development.	C	It was confirmed at the site inspection that the gas wells were plugged and cemented. While the project was completed in 2014, the infrastructure including the gas wells are still in place. The site has thus not entered into rehabilitation phase as yet. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.2.2	At a borehole with a history of methane emissions, the borehole will be plugged in the casing using a bridge plug and sealed at surface with a steel cap.		
4.2.3	Boreholes will be backfilled and compacted with appropriate inert material and soil. No foreign matter such as rubble or waste material will be introduced into the hole.	T/N	
4.3 Rehabilitation of Disturbed Areas			
4.3.1 Backfilling and Contouring			
4.3.1.1	All remaining voids will be backfilled using the stockpiled subsoil material removed during site clearing.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.1.2	Rocks will be placed at the bottom of the voids.		
4.3.1.3	Site levelling will ensure that no troughs (low points) are created where water could accumulate/pond.		
4.3.1.4	The site will be contoured and levelled so that it is continuous with the surrounding topography		
4.3.2 Physical Substrate Preparation			
4.3.2.1	The substrate will be physically prepared for revegetation.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.2.2	This will involve tilling affected areas to a depth of 10 cm to loosen clods and prepare a planting/seeding surface.		
4.3.3 Topsoiling			
4.3.3.1	In all affected areas where topsoil was previously stripped, the topsoil layer will be replaced. Topsoil will be sourced from the stockpiles set aside on-site establishment. An even spread of topsoil over all affected areas will be created.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.4 Chemical Substrate Preparation			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.3.4.1	The substrate will be chemically prepared for revegetation. This will involve applying fertiliser and working this into the topsoil. In order to determine the type and quantity of fertiliser that will be required during rehabilitation, soil samples will have to be taken from the stockpiled and analysed by a laboratory as the nutrient status of the stockpiled soil may have changed considerably during the 5-Spot Test.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.5 Revegetation			
4.3.5.1	The prepared substrate will be revegetated to establish a cover of plant material to control erosion, improve the visual quality of the site.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.5.2	The affected areas will be seeded with an appropriate mix of indigenous plant species. <i>Solanum sp</i> , <i>Blepharis sp</i> , <i>Sida rhombifolia</i> and <i>Heliotropium ciliatum</i> are prominent grass species throughout the area, in some instances dominating the grass stratum. Species of the woody component include <i>Acacia mellifera</i> , <i>Terminalia sericea</i> or <i>Dichrostachys cinerea</i> .		
4.3.5.3	All revegetated areas will be watered appropriately after seeding.		
4.3.6 Protection Structures			
4.3.6.1	Erosion protection measures will be installed at sites, which may be susceptible to erosion in the long- term.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.3.6.2	A brush mattress (dry branches, preferably thorny) will be placed along the perimeter of rehabilitated sites to prevent access by cattle. This will ensure that the rehabilitated areas are not trampled and overgrazed by livestock and the vegetation cover has an opportunity to become established before being exposed to grazing pressures.		
4.4 Rehabilitation of Access Routes			
4.4.1	Whenever a prospecting permit is suspended, cancelled or abandoned or if it lapses and the holder does not wish to renew the permit, any access road or portion thereof, constructed or upgraded by the company for the purposes of prospecting, and which will no longer be required by the landowner/land user/resident will be rehabilitated to the satisfaction of the Regional Director.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.4.2	Roads will be rehabilitated according to the procedure described above. Tracks will be disced to loosen the compacted soil.		
4.4.3	Imported road construction materials, which may hamper re-growth of vegetation, will be removed prior to rehabilitation and disposed of in an approved manner.		
4.5 Control of Invasive Species			
4.5.1	The rehabilitated area will be monitored for 12 months for invader species. Manual control measures and, if required, the application of chemicals will be implemented to correct imbalances.	T/N	The 5-Spot project was completed in 2014, however, all related infrastructure, equipment and installations have remained in place. The site is currently under care and maintenance by the Thungela LCBM site staff. The site will only commence with rehabilitation as discussed in Section 4 of the EMPr

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.5.2	When final rehabilitation is complete, all invasive plants will have been removed from the areas affected during the 5-spot test and appropriately disposed of.	T/N	when infrastructure and equipment is removed. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.6 Maintenance and Monitoring			
4.6.1 Groundwater Monitoring			
4.6.1.1	The groundwater-monitoring programme proposed is presented in Table 4-1. The boreholes shown in Figure 4 will be monitored according to the schedule in Table 4-1 during the operational phase. The information obtained from the monitoring programme will be presented to the authorities on a quarterly basis for evaluation. At the end of the operational phase, a full report will be submitted to the authorities, which will discuss the results of the monitoring programme, including trends and potential impacts. The results from the monitoring programme will be made available to the public for evaluation. Copies of the report will be available for evaluation at the site office of the five-spot test.	N/A	The condition falls outside of the audit period and relates to groundwater monitoring requirements during and at the end of the operational phase.
4.6.1.2	The monitoring programme will be revised after the operational phase in order to determine the length and frequency of post-closure monitoring. The revision will be based on the results of the operational phase monitoring results. It is proposed that Anglo Coal monitor for a period of 12 months after completion of the five-spot test and review the need for monitoring after this period based on the results obtained from the 12-month period.	N/A	The condition falls outside of the audit period and relates to groundwater monitoring requirements during and at the end of the operational phase. The groundwater monitoring program was developed in accordance with conditions in the General Authorisation (GA) 16/2/7/A400/C43/1 is ongoing. The quarterly monitoring reports, which includes groundwater monitoring for 2024, were made available during the audit.
4.6.2 Surface Water Monitoring			
4.6.2.1	Surface water monitoring will take place bi-annually for a period of 12 months at the sampling point SW1 upstream and SW2 downstream of the 5-Spot Test site (see Part A). The samples will be sent to an accredited laboratory for analysis and the qualities will be compared to the pre-mining surface water qualities.	T/N	No evidence of bi-annual surface monitoring at SW1 and SW2 or submission of the report to the authorities was available during the audit. However, the condition discussed monitoring requirements in terms of Section 4. Rehabilitation. The site has not yet commenced with rehabilitation. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.6.2.2	The surface water monitoring results will be reported and presented to the authorities on an annual basis.		
4.6.3 Air Quality Monitoring			
4.6.3.1	A methane leakage detection programme at the rehabilitated gas wells will be implemented for a period of 12 months after cessation of the 5-Spot Test.	N/A	The condition falls outside of the audit period and relates to air quality monitoring for a period of 12 months after cessation of the 5-Spot Test. The project was completed in 2014.
4.6.3.2	In the unlikely event of methane escaping from a borehole, the applicant will return to site to reseal the well within 48 hours of the detection of the gas.		
4.6.4 Site Maintenance			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.6.4.1	The progress of the rehabilitation will be monitored during the maintenance period and any problems that arise will be addressed immediately. This may involve repair of erosion sites; re-seeding of areas where rehabilitation has failed; or removal of the brush mattress once rehabilitated areas are stable.	T/N	All site operations have ceased, however, all infrastructure is still in place. The site is thus not in rehabilitation phase and no activities related to rehabilitation have commenced. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.
4.7 Photographic Records			
4.7.1	Photographs of the drilling and office sites will be taken at selected points before, during the 5-Spot Test and after rehabilitation, and kept on record for the Director: Mineral Development's information.	C	Photographs showing the drilling and office sites were taken at selected points before, during the 5-Spot Test and after borehole rehabilitation. The said photographs were provided to the auditors.
4.8 Rehabilitation Contract			
4.8.1	A responsible competent person will be appointed to oversee the rehabilitation and maintenance of disturbed areas. If applicable, the requirements for site rehabilitation, as documented in this report, must be made available to the competent person(s) responsible for site rehabilitation.	N/A	All site operations have ceased, however, all infrastructure is still in place. The site is thus not in rehabilitation phase and no activities related to rehabilitation have commenced. Thungela LCBM understands that it must comply with Section 4 of this EMPr when the 5-Spot project area commences with rehabilitation.

Table 6: Consolidated Environmental Management Programme approved in terms of the consolidated Exploration Right (PASA ref: 5/2/2/102) for Coal Bed Methane in Waterberg District Municipality

EMPr Report Title: Anderson Geological Consulting (July 2015) Environmental Management Plan for the Consolidation of Exploration Rights for Coal Bed Methane in Waterberg District Municipality. Section 5. Environmental Management Plan (pp 78 - 107).

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
SECTION 5: TABLE 14. ENVIRONMENTAL MANAGEMENT PLAN			
Climate (Row, page 78)			
	Environmental impacts are insignificant. No mitigation plan is required.	T/N	The condition has been noted by Thungela LCBM. All boreholes have been closed, cemented and cut at 1m beneath the soil and rehabilitated.
	Soil stockpiles are protected with plastic sheeting during wet weather/ thunderstorms.	T/N	The condition has been noted by Thungela LCBM. At the time of the audit, no construction was taking place and all exploration wells were in process of rehabilitation. No stockpiles were noted during the site inspection.
Topography (Row 4, page 78)			
	Soil is stockpiled in such a manner as to remove potential contamination. The sump is back filled with topsoil once drained and the earth's surface is contoured back to its former state.	T/N	The condition has been noted by Thungela LCBM. At the time of the audit, no construction was taking place and all exploration wells were in process of rehabilitation. No stockpiles were noted during the site inspection on 07 April 2025.
Geology (Row 5, page 78)			
	The void compacts with time. No mitigation plan required. All holes shall be cemented to the top of coal.	C	The condition is noted by Thungela LCBM. Boreholes have been capped.
Soil (Row 4, page 78)			
	Use biodegradable drilling fluids.	N/A	It was confirmed at the site inspection on 07 April 2025 that the exploration wells were plugged and cemented. LCBM indicated that a soluble agent was used for hydraulic stimulation during fracking, which breaks down into water.
	All oil spills and waste material must be cleaned up for proper disposal upon leaving site.	T/N	The condition has been noted by Thungela LCBM. At the time of the audit, no construction was taking place and all exploration wells were in process of rehabilitation. No stockpiles were noted at the site.
	Spills must be cleaned in accordance with the OPEMGT 001 procedure on fuel handling and storage. In addition, bioremediation must be applied in situ in applicable cases in accordance with the ENVOPE 001 procedure on Bioremediation. Both procedures are available upon request.	T/N	LCBM has noted this condition. The exploration activities have ceased, and oil spill incidents caused by drilling activities are not applicable for this audit period.
	Use a drip pan to collect oil that may leak from beneath the rig. Any oil that may leak from beneath the rig. Any oil collected must be stored and disposed of or recycled as applicable.	C	The rig is stored on a paved, bunded and underground area in the workshop. Any spills in this are diverted into a sump.
Land capability (Row 2, page 79)			
	Rehabilitate the drill site by reshaping the area to be free draining.	C	The auditors observed adequate rehabilitation cover over Waterberg 1 and 11. Site Rehabilitation Imagery comparison around historically drilled boreholes have been backfilled and compacted according to the specified parameters of free drainage as per the EMP.
	Fertilise, rip the soil and seed once drilling operations are complete if it is determined that rehabilitation will not take place naturally.	NC 005	Rehabilitation has been undertaken, but no seeding. When comparing the rehabilitated sites with the surrounding areas, they are not in line with the surrounding vegetation cover. Severe alien invasive encroachment was observed as well as bush encroachment. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled <i>Alien Invasive Management Plan and Rehabilitation Strategy</i> dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.
Vegetation (Row 3, page 79)			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	Do not destroy indigenous trees over 2m tall. No protected trees may be moved or altered without an appropriate licence. A list of protected trees must accompany every drilling folder. Avoid natural vegetation areas and use existing disturbed areas where possible.	N/A	This condition falls outside of the scope of the audit period.
	Keep out of wetland, riparian and flood plain areas (no closer than 30m from identifiable drainage line).	N/A	At the time of the audit, no construction was taking place and all exploration wells were in process of rehabilitation. The exploration wells that were previously installed were not in the vicinity of wetland, riparian and flood plain areas.
	Allow site to re-vegetate naturally after drilling.	C	Two rehabilitated areas where exploration wells (WBGP-007 and WBGP 010) were installed were observed during the site inspection on 07 April 2025. The exploration wells have been plugged and cemented and are not visible. The previously cleared area is now covered by grass, but devoid of indigenous shrubs and trees. The succession of indigenous trees is also hindered by the presence of game that favour open grasslands and woodland edges. It was noted that the area had a significant encroachment of alien and invasive species. Refer to Photograph Set 1.
	Fertilise and seed the site if deemed necessary by ACES after one year of rehabilitation.	N/A	The condition falls outside of the audit period.
	Take fire precautions and keep fire extinguishers on site.	C	It was confirmed during the audit that Thungela LCBM staff conduct fire management for all areas under its ownership, including Water Berg Project Area. Potential fires are addressed through Thungela's Emergency Preparedness and Response Procedure. During the site inspection fire hoses were noted at the LCBM homestead, office areas, bulk diesel store and workshops and 5 Spot project site.
Animal life (Row 2, page 80)			
	Do not disturb animal warrens/nesting sites when establishing a drill site.	N/A	At the time of the audit, no disturbances to animal life were noted. No construction was taking place and all exploration wells that were previously installed were capped and cemented.
	Dangerous animals i.e., buffalo and rhinoceros. Drill sites should be located outside the camps in which these animals roam. If this is not possible a temporary fence must be established. In both cases awareness training must be conducted for all personnel on site.	N/A	
	Valuable animals: Certain species ex, Sable antelope are very valuable and extra precautions must be taken, these include the above Listed species: The perceived impact is low however to further mitigate any disturbance no one is to overnight on the property. This will reduce the duration of the impact and should eliminate potential poaching.	N/A	
Rivers/ surface water (Row 2, page 81)			
	Do not establish drill sites or camps in watercourses or pans. Keep out of wetland areas, riparian areas and flood plains (no closer than 30m from identifiable drainage line).	N/A	At the time of the audit, no construction was taking place and all exploration wells were in process of rehabilitation. The exploration wells that were previously installed were not in the vicinity of wetland, riparian and flood plain areas.
Ground water (Row 3, page 81)			
	Environmental risk is insignificant. Casing is removed to allow the void to compact with time. All drilled holes shall be cemented to the top of coal, to prevent interactions from different aquifers.	C	Two rehabilitated areas where exploration wells (WBGP-007 and WBGP 010) were installed were observed during the site inspection on 07 April 2025. The exploration wells have been plugged and cemented and are not visible.
Land use (Row 4, page 81)			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	Rehabilitate the drill site once drilling operations are complete in accordance with the provisions provided by this EMP. Damage to gates, fences and property is repaired.	C	Two rehabilitated areas where exploration wells (WBG-007 and WBG-010) were installed were observed during the site inspection on 07 April 2025. Exploration wells have been plugged and cemented and are not visible. The previously cleared area is now covered by grass. However, rehabilitation has not been sufficient, considering the vegetation cover and encroachment of Alien and Invasive species. Refer to photograph set 1. The boundary of the property owned by Thungela is fenced and access is restricted. During the site visit, the sections of the fence that were inspected were well maintained.
Protected Areas (Row 5, page 81)			
	Enter into a surface agreement, which outlines strict rehabilitation plans in the event that protected area is drilled. All drill sites for this permit occur outside of protected areas.	T/N	The condition has been noted by Thungela LCBM. No construction is currently taking place and all previously installed exploration wells have been capped and cemented.
Socio Economic (Row 1, page 82)			
	Employ local people at campsites etc. wherever possible. Consult with interested and affected parties.	N/A	No construction is currently taking place and all previously installed exploration wells have been capped and cemented. Thungela understands that it must adhere to the construction requirements contained within the EMP should they plan for further exploration well testing.
	Consult with Interested and Affected Parties	N/A	
	Ensure that drill rigs are fitted with silencers.	N/A	
	Drill between sunrise and sunset only.	N/A	
Interested and Affected Parties (Row 2, page 82)			
	Consult with Interested and affected parties before and after drilling operations, accommodate issues/requests if it is feasible and line with the EMP; record interactions through the use of an I & AP register. Care will be taken to accommodate individual requests as noted.	N/A	The condition falls outside of the scope of the audit period.
5.1. SANITATION			
	A portable chemical toilet is present at every drill site. The supplier removes the contents of the toilets. Ablution facilities in the form of showers are provided at the worker residence which is not at the drill site but located adjacent to the Project office facility. Camping at drill sites is not permitted.	N/A	No chemical toilets are used at the site. It was confirmed during the audit that portable toilets were supplied during construction. However, at the time of the audit the site was not operational and there were no toilets at the project area. The homestead (staff accommodation areas) and the Thungela LCBM Nooitgedacht Office areas use a septic tank system from which waste effluent is discharged into French drains.
5.2. HAZARDOUS MATERIALS			
	All hazardous materials used have Material Safety Data Sheets (MSDS) present on site at all times. The data sheets contain all relevant information regarding safe use of the materials and are contained in a complete register. A short inventory is supplied below and the MSDS's are available on request.	C	MSDS were provided during the audit by Thungela LCBM.
5.3. GENERAL WASTE MANAGEMENT STRATEGY			
	General waste is collected in a dustbin on site and removed to the Lephalale Municipal Dump site. The Lephalale Municipal Dump site is currently unlicensed although the Municipality has been attempting to acquire a licence for the last 5 years. The Project has a signed authorization letter from the Municipality giving permission to use the dump site. This activity will have no implication for the rehabilitation cost.	C	General waste is generated at Nooitgedacht offices, Homestead Accommodations and this is stored in sealed waste and disposed of at the Lephalale Landfill site.
5.4. SOIL EROSION			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	No access roads are constructed. Only existing roads are used which are maintained when necessary. Due to the flat topography of the area and low rainfall, the potential for soil erosion due to minor bush clearing (if necessary) at the drill sites is negligible.	C	During the audit, the access roads observed were found to be in good condition. Thungela LCBM did not construct access roads as adequate road access was available from previous farming activities. Access roads are maintained by Thungela LCBM.
5.5. ENVIRONMENTAL AWARENESS PROGRAM			
	The Environmental Officer is responsible for managing all aspects pertaining to environmental issues including the EAP, and management policies aligned with pertinent legislation and recommendations from annual environmental audits. Project Geologists, Mr Johan Koekemoer is responsible for the implementation of the exploration EMP. In addition, all employees including contractors are required to complete a one day SHE induction course which includes environmental awareness training.	C	Thungela has appointed an Environmental Officer and Environmental Specialist to manage and oversee all environmental issues including site legal compliance. He continues to be supported by Mr Johan Koekemoer (Project Geologists). While the site is no longer operational and currently in a state of care and maintenance, the EMP continues to be monitored.
5.6. ACCESS ROADS			
	All care is taken to only use existing farm roads for access to drill sites. Boreholes are therefore sited adjacent to existing farm tracks to mitigate the environmental impact of the exploration activities. Where this is not possible a least potential damage approach is followed. The NEMA regulations are considered and any potential environmental risks are brought to the attention of the Environmental Officer to determine possible harmful impacts, mitigation measures, rehabilitation requirements and legal implications.	C	During the audit, the access roads observed were found to be in good condition. Thungela LCBM did not construct access roads as adequate road access was available from previous farming activities. Access roads are maintained by Thungela LCBM.
5.7. TOPSOIL STRIPPING			
	The topsoil layer in the area is rarely deeper than 300 mm and as such stripping is maintained at this suggested depth. Soil is stockpiled within the designated drill site area and is replaced during the rehabilitation phase (refer drill site layout plan section 3.4.1 of this document). In addition, topsoil stockpiles are covered during rainy weather to prevent erosion. Due to the short time frame between topsoil stripping and replacement and the small amount of topsoil stripped this is seen as a minor risk.	C	No construction is currently taking place and all previously installed exploration wells have been capped and cemented. Two rehabilitated areas where exploration wells (WBG-007 and WBG-010) were installed were observed during the site inspection on 07 April 2025. The previously cleared area is now covered by grass and bare areas but no areas of erosion activity were noted during the audit. No stockpiles were noted during the site visit.
	An Environmental Code of Practice for Exploration/ Prospecting forms part of the Environmental Management System of this report and is used as a guideline to prevent unnecessary damage to the environment. These guidelines are appended to all drilling contracts entered into with Anglo Operations Pty Ltd and are thus legally binding on contractors to Anglo Operations Pty Ltd	N/A	The condition falls outside of the scope of the audit period.
	Additionally, completion of the forms contained in this report by all stakeholders, namely the project geologist, the drilling contractor, the legal occupant of the surface portion affected and the exploration manager, creates an environmental awareness plan whereby it is acknowledged that environmental risks have been mitigated and exploration activities are closed out in accordance with the procedures described in this EMP.	N/A	The condition falls outside of the scope of the audit period.

5. RESULTS OF THE AUDIT

5.1. SUMMARY OF NON-COMPLIANCES

A total of six (6) non-compliances were raised during the audit as summarised below in terms of the relevant Environmental Authorisation or Environmental Management Programme. The non-compliances are described in detail in Section 4.2.

Table 7. Summary of non-compliances.

NC 001	<p>During the audit, no evidence of interaction with I&APs or public meetings were provided. Although the site is not operational, communication lines and procedures are important considering that the Thungela LCBM is sharing mutual access roads, fences and farm properties with surrounding farmers. LCBM has indicated that they have created a WhatsApp group that includes all the I&APs as a communication method.</p>
NC 002	<p>The LCBM Staff advised that during the vegetation clearing, only alien invasive trees were removed. It was noted that the area had a significant encroachment of alien and invasive species, notably, <i>Senegalia mellifera</i> (Blackthorn), <i>Terminalia sericea</i> (Cluster leaf) and <i>Dichrostachys cinerea</i> (Sicklebush). Currently no AIP Programme is in place on site and significant invasion of these species and bush encroachment were observed. Refer to Photograph Set 1. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.</p>
NC 003	<p>During the site inspection on 07 April 2025, it was noted that the chemicals used while the site was operational had not yet been removed from the site (refer to photograph set 5). These were however contained in an adequately bunded and locked cage. However, spillages were observed adjacent to the bunded area resulting in soil contamination.</p>
NC 004	<p>Fuel is stored at the farmhouse. A 30m³ Diesel tank is in place at the Storage Area and this tank contains about 28m³ diesel but has a capacity of 30m³.</p> <p>During the audit, acceptable storage of Diesel with signage was observed at the workshop and bulk diesel storage area. The provided diesel tank specification confirms that the tank is made up of an internal fuel storage tank (rectangular design), this internal tank is surrounded by an external tank (or skin) providing the 'self-bunded' functionality of the design. However, the diesel tank specification does not confirm whether the bounded area has the capacity two times the storage volume of the tanks to contain any spillage.</p> <p>Registration of this facility in terms of the local municipal by-laws are also required. It is noted that communication was established with the local municipality regarding the registration of a fuel storage tank, as indicated in an email dated 03 November 2024, however, no permit or further evidence of engagement has been provided.</p>
NC 005	<p>Rehabilitation has been undertaken, but no seeding. When comparing the rehabilitated sites with the surrounding areas, they are not in line with the surrounding vegetation cover. Severe alien invasive encroachment was observed as well as bush encroachment. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled <i>Alien Invasive Management Plan and Rehabilitation Strategy</i> dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.</p>

5.2. DETAILS OF THE NON-COMPLIANCES

5.2.1. EMPr for the CBM Pre-feasibility 5 Spot Test approved in terms of the Exploration Right issued by PASA (REF NO. 5/2/2/102)

During the audit, no evidence of interaction with I&APs or public meetings were provided. Although the site is not operational, communication lines and procedures are important considering that the Thungela LCBM is sharing mutual access roads, fences, and farm properties with surrounding farmers. LCBM has indicated that they have created a WhatsApp group that includes all the I&APs as a communication method. Refer to Table 5. Condition 2.10.5.

The LCBM Staff advised that during the vegetation clearing, only alien invasive trees were removed. During the site inspection, it was noted that the area had a significant encroachment of alien and invasive species, notably, *Senegalia mellifera* (Blackthorn), *Terminalia sericea* (Cluster leaf) and *Dichrostachys cinerea* (Sicklebush). Currently no AIP Programme is in place on site and significant invasion of these species and bush encroachment were observed. Refer to Photograph Set 1. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site. Refer to Table 5. Condition 3.2.3.1.3.

During the site inspection on 07 April 2025, it was noted that the chemicals used while the site was operational had not yet been removed from the site (refer to photograph set 5). These were however contained in an adequately bunded and locked cage. However, spillages were observed adjacent to the bunded area resulting in soil contamination. Refer to Table 5. Condition 3.2.5.1 and Condition 3.2.5.2.

Fuel is stored at the farmhouse. A 30m³ Diesel tank is in place at the Storage Area and this tank contains about 28m³ diesel but has a capacity of 30m³. During the audit, acceptable storage of Diesel with signage was observed at the workshop and bulk diesel storage area. The provided diesel tank specification confirms that the tank is made up of an internal fuel storage tank (rectangular design), this internal tank is surrounded by an external tank (or skin) providing the 'self-bunded' functionality of the design. However, the diesel tank specification does not confirm whether the bounded area has the capacity two times the storage volume of the tanks to contain any spillage. Registration of this facility in terms of the local municipal by-laws are also required. It is noted that communication was established with the local municipality regarding the registration of a fuel storage tank, as indicated in an email dated 03 November 2024, however, no permit or further evidence of engagement has been provided. Refer to Table 5. Condition 3.2.5.5.

5.2.2. Consolidated EMPr approved in terms of the consolidated Exploration Right (PASA ref: 5/2/2/102) for Waterberg 1 and Waterberg 11

Rehabilitation has been undertaken, but no seeding. When comparing the rehabilitated sites with the surrounding areas, they are not in line with the surrounding vegetation cover. Severe alien invasive encroachment was observed as well as bush encroachment. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site. Refer to Table 6. Land capability (Row 2, page 79) section.

5.3. CONTINUED IMPROVEMENT

Although four of the total five findings recorded are repeat findings from the previous audit (2023/2024), areas of improvement are evident through the closure of a number of previous findings. Additionally, actions have been initiated during the audit period towards closing the repeat findings, however, full implementation of the actions has not yet occurred, preventing closure of the finding at this stage. This reflects a degree of continuous improvement, nevertheless, further effort and consistent implementation of corrective actions are required to achieve full compliance and prevent non-compliances.

6. CONCLUSION

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.*

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

The audit team concludes that Thungela LCBM largely complies with the conditions of the Environmental Authorisation (EA) and Environmental Management Programmes (EMPRs) that were audited as part of the scope of the External Environmental Audit (February 2024 to January 2025). Environmental management at Thungela LCBM was found to be in a good state and sufficient procedures and records were available to govern the activities that take place at the site.

As long as non-compliances are addressed, Thungela LCBM will be in a position to comply with the conditions of its EA and EMPRs. It is the opinion of the audit team that corrective actions can be effected and implemented within a short period if one considers the nature and extent of non-conformances. The evaluation of the effectiveness of the implementation of corrective actions should be carried out during follow-up external environmental audits, currently scheduled for 2026.

Thungela LCBM is commended on the proactive approach that is taken toward improving how it manages the environment within and surrounding its activities. The auditors would like to thank Thungela LCBM for the cooperation extended, and the open approach to the audit.

APPENDIX A

AUDITOR DECLARATION

The Environmental Assessment Practitioner General declaration:

I, **TANJA BEKKER**, 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:

03 NOVEMBER 2025

The Environmental Assessment Practitioner General declaration:

I, **RAISIBE MABIZA**, 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: **03 NOVEMBER 2025**

APPENDIX B

AUDITOR'S CURRICULA VITAE



Tanja Bekker

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

BRIEF PROFILE

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

PROFESSIONAL QUALIFICATIONS

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

CAREER ENHANCING COURSES

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

CAREER ENHANCING COURSES

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

**RAISIBE MABIZA**

Company: NTC Group (Pty) Ltd

Environmental Consultant

Mobile: +27 72 679 3782

Email: raisibe@ntcgroup.co.za**BRIEF PROFILE**

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

PROFESSIONAL REGISTRATIONS

SACNASP Professional Natural Scientist (123746)

PROFESSIONAL QUALIFICATION

2019: Bachelor of Science Honours in Environmental Management

2014: Bachelor of Science in Environmental Management & Geology

PROJECT EXPERIENCE

Raisibe has been involved in several projects as outlined below:

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



LCBM - PERFORMANCE ASSESSMENT REPORT FOR THE ENVIRONMENTAL EXTERNAL AUDIT 2024/ 2025

REGULATION 34 – Action Plan 2025

Date: 05 December 2025

Number	Non-conformance finding	Action/Task	Responsible person	Action date/ Status
NC 001	During the audit, no evidence of interaction with I&APs or public meetings were provided. Although the site is not operational, communication lines and procedures are important considering that the Thungela LCBM is sharing mutual access roads, fences and farm properties with surrounding farmers. LCBM has indicated that they have created a WhatsApp group that includes all the I&APs as a communication method.	Conduct public meetings with farmers	Johan Koekermoer	<u>Completed</u>
NC 002	The LCBM Staff advised that during the vegetation clearing, only alien invasive trees were removed. It was noted that the area had a significant encroachment of alien and invasive species, notably, Senegalia mellifera (Blackthorn), Terminalia sericea (Cluster leaf) and Dichrostachys cinerea (Sicklebush). Currently no AIP Programme is in place on site and significant invasion of these species and bush encroachment were	Phase 1 - Implement alien vegetation clearing on all areas that were disturbed by exploration drilling on Thungela owned properties	Johan Koekemoer	31 Dec 2026



	<p>observed. Refer to Photograph Set 1. It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.</p>	<p>Phase 2 – map areas area not disturbed by gas project – incorporate into future management plan New EA</p>		
<p>NC 003</p>	<p>During the site inspection on 07 April 2025, it was noted that the chemicals used while the site was operational had not yet been removed from the site (refer to photograph set 5). These were, however, contained in an adequately bunded and locked cage. However, spillages were observed adjacent to the bunded area resulting in soil contamination.</p>	<p>Clean-up oil spillages as per the Hydrocarbon management procedure</p>	<p>Tanya De Klerk</p>	<p><u>Completed</u></p>
<p>NC 004</p>	<p>Fuel is stored at the farmhouse. A 30m³ Diesel tank is in place at the Storage Area and this tank contains about 28m³ diesel but has a capacity of 30m³.</p> <p>The legality of this tank must be assessed due to the requirement in terms of Listing Notice 3 – all area in Limpopo, which must have an Environmental Authorization for the storage of dangerous goods in excess of 30m³. The Limpopo Department of Economic Development, Environment and Tourism (LEDET) must be consulted to determine whether the diesel tank storage activity triggers Listing Notice 3.</p> <p>- Registration of this facility in terms of the local municipal by-laws are also required. It is noted that communication was established with the local municipality regarding the registration</p>	<p>Register the 30m³ fuel storage as dictated by the Municipal by-laws of the area</p> <p>Conduct a gap analysis on whether the 30m³ tank triggers a listed activity as per the 2015 EIA listing regulations</p>	<p>Tanya De Klerk</p>	<p>30 June 2026</p>



	<p>of a fuel storage tank, as indicated in an email dated 03 November 2024, however, no permit or further evidence of engagement has been provided.</p> <p>During the audit, acceptable storage of Diesel with signage was observed at the workshop and bulk diesel storage area. The diesel tank is self-contained, and the certificate of the diesel storage bund confirms it is able to contain twice the storage volume.</p>			
<p>NC 005</p>	<p>Rehabilitation has been undertaken, but no seeding. When comparing the rehabilitated sites with the surrounding areas, they are not in line with the surrounding vegetation cover. Severe alien invasive encroachment was observed as well as bush encroachment.</p> <p>It must be noted that LCBM has appointed a service provider to implement an alien vegetation eradication program and the quotation from Hydromulch titled Alien Invasive Management Plan and Rehabilitation Strategy dated 28th January 2025 was provided to the auditors. However, the Alien Invasive Management Plan and Rehabilitation Strategy has not yet been implemented on site.</p>	<p>Undertake rehabilitation at the exploration borehole sites.</p>	<p>Johan Koekermoer</p>	<p>30 June 2026</p>

Regards,

Vukosi Tinghitsu

Vukosi Tinghitsu

Environmental officer

Vukosi.tinghitsu@thungela.com

05/12/2025

Regards

Andre Meyer

Andre Meyer

Project Manager

andre.meyer1@thungela.com

05/12/2025