



# **MAFUBE COLLIERY: SPRINGBOKLAAGTE**

## **EXTERNAL ENVIRONMENTAL AUDIT: ATMOSPHERIC EMISSION LICENCE (2024 - 2025)**

**AUDIT DATES: 09 – 13 June 2025**

**AEL LICENCE NO:**

**NDM/AEL/MP313/14/06 (28 January 2025)**

**PREPARED BY:**

NTC GROUP (PTY) LTD

CDH BUILDING

1 PROTEA PLACE

SANDTON

2031

TEL: +27 11 462 2022

EMAIL: teboho@ntcgroup.co.za

**PREPARED FOR:**

MAFUBE COLLIERY

PO BOX 1521

SAXONWOLD

2132

SOUTH AFRICA

TEL: 013 691 5532

EMAIL: ingrid.sithole@thungela.com

# DOCUMENT CONTROL

## VERSION CONTROL

NO.	AUTHOR	CHANGES	DATE
0.1	Tshokologo Mangwale	Compile Report	05.01.2025
0.2	Teboho Motinyane	Review Report	20.01.2026
0.3	Ingrid Sithole	Authorise Report	

## REQUIRED APPROVAL

NAME	POSITION	DATE
Ingrid Sithole	Thungela Mafube Colliery: Environmental Superintendent	

## DISTRIBUTION LIST

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

## RELATED DOCUMENTS

NO.	DOCUMENT	DATE
0.1	Atmospheric Emission Licence (Licence No. NDM/AEL/MP313/14/06) issued by Nkangala District Municipality to Mafube Colliery: Atmospheric Emission License as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)	28.01.2025

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## 1. INTRODUCTION

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

Thungela appointed NTC Group (Pty) Ltd as an independent Environmental Practitioner to undertake an annual external compliance audit of the conditions of the Atmospheric Emission Licence (AEL) issued to its operations. This report presents the external compliance audit of the AEL issued to Mafube Colliery: Springboklaagte in terms of Section 21 of the National Environmental Management: Air Quality Act (NEMAQA) (Act 39 of 2004) for Listed Activity 4.11.1 “*Production of pellets or briquettes using presses, inclined discs or rotating drums*”.

### 1.1. MAFUBE COLLIERY

Mafube Colliery was a 50-50 Joint Venture between Anglo American Thermal Coal (AATC) (Pty) Ltd and Exxaro (Pty) Ltd, however, following the demerger and transfer of AATC on 04 June 2021, Thungela now owns the interests in Mafube Colliery.

Mafube Colliery is comprised of two sections, the Mafube Colliery: Springboklaagte Section and Mafube Colliery: Nooitgedacht Section. The Springboklaagte Section is a former opencast mine authorised in terms of a Mining Right (MP 30/5/1/2/2/172 MR) issued by the Department of Mineral Resources and Energy (DMRE) and reached its Life of Mine in December 2018, after which operations ceased, and rehabilitation commenced in 2022. The Nooitgedacht Section is currently operational and authorised in terms of a separate Mining Right (MP 30/5/1/2/2/1/ 10023 MR), where open cast mining is taking place on farms Nooitgedacht and Wildfontein situated adjacent to the Springboklaagte Section.

#### 1.1.1. Mafube Colliery: Springboklaagte

Mafube Colliery: Springboklaagte Section is located approximately 17 km north of Arnot Power Station and 20 km east of Middelburg, on the farms Springboklaagte 416JS, Elandsfontein 433JS and Kleinfontein 432JS within the Steve Tshwete Local Municipality and Nkangala District Municipality, Mpumalanga. Opencast mining was undertaken at the North Pit and the South Pit (now one section), which are divided by Provincial Road P-154, with District Road D-1398 running along the western boundary and Secondary Road D-684 running parallel to the southern and eastern boundary. Mafube Colliery: Springboklaagte reserve is about 6 km long and 2 km wide, covering an area of 1000 Ha (refer to the locality map in Figure 1).

Mafube Colliery: Springboklaagte commenced operation under an old order Mining Right (Ref. ML30/ 2004) and authorised EMPr issued by the DMRE in 2004. Mafube Colliery: Springboklaagte subsequently applied for conversion to a new Mining Right (Ref. MP 30/50/1/2/2/172 MR), which was granted by the DMRE in 2008. The DMRE additionally requested Mafube Colliery: Springboklaagte to consolidate its two approved EMPRs and align this with the requirements of the MPRD Act (Act 28 of 2002) and the MPRD Regulations (GNR 527 of 2004). The consolidated EMPr included the mine plan change, beneficiation plant, and discard facility and was approved by the DMRE on 12 November 2019.

Mafube Colliery: Springboklaagte is no longer operational since mining activities ceased in December 2018, with the last coal removed from the west pit in November 2018 and rehabilitation commenced in 2022. The open pits have been backfilled, levelled and shaped and the rehabilitation of Pan 1 and Pan 2 are in progress.

### **1.1.2. Mafube Colliery: Springboklaagte Briquetting Plant**

Mafube Colliery: Springboklaagte operates a Briquetting Plant, which is near the existing coal washing plant. The Briquetting Plant site is less than 1 hectare in size and was devoid of any vegetation since this site formed part of the original construction site for the coal washing plant.

An Atmospheric Emission Licence (AEL) was issued for the Briquetting Plant (Licence No: NDM/AEL/MP313/14/06) in terms of Section 42 of the National Environmental Management: Air Quality Act (NEMAQA) (Act 39 of 2004) for Listed Activity 4.11.1. The licence was initially granted for a period of five (5) years, valid until 31 August 2024, or five (5) years from the date of signature. Mafube subsequently applied for the renewal of the AEL, which was approved on 28 January 2025 and is valid until 28 January 2030. In accordance with Condition 7.6 of the AEL, Mafube Colliery: Springboklaagte is required to conduct an annual audit to assess compliance with the conditions of the AEL for the Briquetting Plant and its associated activities.

Thungela appointed NTC Group (Pty) Ltd to audit compliance of the Mafube Colliery: Springboklaagte Briquetting Plant against the conditions of the AEL for the annual audit period (June 2024 – May 2025).



## 2. TERMS OF REFERENCE

### 2.1. NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT (ACT 39 OF 2004)

In terms of section 22 of the NEMAQA (Act 39 of 2004), no person may undertake a listed activity without a provisional AEL or an AEL issued in terms of the NEMAQA (Act 39 of 2004). Activities that require an AEL are listed under the Listed Activities and Associated Minimum Emission Standards identified in terms of Section 21 of the NEMAQA (Act 39 of 2004), published under Government Notice 893 37054 of 22 November 2013, as amended. An AEL was granted to Mafube Colliery: Springboklaagte for the Briquetting Plant (AEL No. NDM/AEL/MP313/14/06) on 01 January 2025

According to section 43(1)(m) of the NEMAQA (Act 39 of 2004), an AEL issued by a licensing authority must specify amongst other requirements, any other matters which are necessary for the protection or enforcement of air quality. In relation to the above, condition 7.6 (Routine Reporting and Record Keeping – Annual Reporting) states the following i.e.:

*“The Licence Holder must complete and submit to the licensing authority an annual report. The report must include information for the year under review (i.e. annual year end of the company). The report must be submitted to the licensing authority not later than 60 (sixty) days after the end of each reporting period. The annual report must include, amongst others, the following items ... (f) Compliance Audit Report(s)”.*

The above condition of the AEL for the Briquetting Plant stipulates that the Mafube Colliery: Springboklaagte must on an annual basis submit, amongst other reports, compliance audit report(s) for the Briquetting Plant. In view of the above and in complying with the above approval conditions of the AEL, an environmental compliance audit for the Mafube Colliery: Springboklaagte’s Briquetting Plant AEL was undertaken, and the results are hereby submitted.

### 2.2. MAFUBE COLLIERY: SPRINGBOKLAAGTE AIR EMISSION LICENCE

The AEL issued by Nkangala District Municipality to Mafube Colliery: Springboklaagte that remained valid for the audit period:

- 1. Atmospheric Emission Licence (Licence No. NDM/AEL/MP313/14/06) dated 01 January 2025, issued by Nkangala District Municipality to Mafube Colliery: Atmospheric Emission License as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)**

### 2.3. ASSUMPTIONS AND LIMITATIONS

The scope of the audit is to determine the level of Mafube Colliery: Springboklaagte's compliance with the conditions of the AEL.

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

- This audit is a snap-shot representation of the current activities at Mafube Colliery: Springboklaagte.
- The audit period is from June 2024 to May 2025. Conditions which refer to activities occurring prior to this audit period are assumed to have been previously assessed and will thus not be assessed. Such conditions are determined to be "Not Applicable".
- Due to the nature and extent of the operation, not all areas may be visited during the site inspection.
- Mafube Colliery: Springboklaagte representatives may be called upon to provide information relating to specific activities within their respective areas.
- Mafube Colliery: Springboklaagte's Briquetting Plan was not operational during the audit period. Where current activities relate to construction, operation, decommissioning or closure, these may be deemed as not applicable.
- Procedures developed by Mafube Colliery: Springboklaagte specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System.
- Outdated/ repealed legislation or referenced guideline documents will be substituted for with current/ relevant legislation and referenced guideline documents.

### 3. AUDIT DETAILS

#### 3.1. AUDIT TEAM

NTC Group (Pty) Ltd was established in 2005 and is 100% female, black owned with a Level 1 Broad Based Black Economic Empowerment Rating. We undertake our services with professional integrity and have built good reputations with stakeholders in the environmental management field, including regulatory authorities and government departments. We undertake our services in accordance the requirements of South African legislation, as well as acceptable international best practices.

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

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

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
LEAD AUDITOR	Teboho Motinyane is a Principal Environmental Consultant at NTC Group (Pty) Ltd. Teboho holds an MSc Environmental Management and has over 22 years of experience in Environmental Management, inclusive of performance assessment audits and compliance monitoring.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: <a href="mailto:teboho@ntcgroup.co.za">teboho@ntcgroup.co.za</a>
LEAD AUDITOR	Tanja Bekker is a Senior Environmental Scientist at NTC Group (Pty) Ltd. Tanja holds an MSc Environmental Management and has over 22 years of experience in Environmental Management, inclusive of performance assessment audits and compliance monitoring.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: <a href="mailto:tanja@ntcgroup.co.za">tanja@ntcgroup.co.za</a>

#### 3.2. AUDIT METHODOLOGY

##### 3.2.1. Document Review

NTC Group (Pty) Ltd reviewed the conditions of the AEL issued to Mafube Colliery: Springboklaagte and compiled a Request for Information (RFI) document which provided a list of documents and records required to verify compliance with the conditions of the AEL. The RFI was submitted to Mafube Colliery: Springboklaagte and the requested information was availed to the auditors. The list of documents reviewed during the audit are provided in Section 7. References.

A Checklist was created verbatim of the conditions of Mafube Colliery: Springboklaagte’s AEL and used to assess compliance. The numbering in audit checklist corresponds with the conditions of the AEL as far as possible, to allow for ease of reference.

### 3.2.2. Site Assessment

A site assessment was conducted on 9 - 13 June 2025 and was attended Teboho Motinyane (NTC), Tanja Bekker (NTC), Tshokologo Mangwale (NTC), Ingrid Sithole (Mafube Colliery), Jackie Hlomuka (Mafube Colliery) and Caroline Perpermans (Pinsent Masons). During the site assessment, Mafube Colliery: Springboklaagte personnel were interviewed, and the Briquetting Plant area was inspected.

### 3.3. AUDIT COMPLIANCE CRITERIA

NTC Group (Pty) Ltd assessed each condition of Mafube Colliery: Springboklaagte’s AEL in terms of the criteria provided in Table 2. The audit approach was guided by the requirements of the ISO 19011:2018 Guidelines for Auditing Management Systems.

**Table 2: Audit 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 soon, or which allows the Competent Authority certain allowances.

### 3.4. AUDIT SCOPE

The purpose of this audit was to verify whether Mafube Colliery: Springboklaagte complies with the requirements outlined in the AEL and to report the same in the form of an audit report. Mafube Colliery: Springboklaagte is operating in accordance with the below AEL:

- 1. Atmospheric Emission Licence (Licence No. NDM/AEL/MP313/14/06) dated 28 January 2025, issued by Nkangala District Municipality to Mafube Colliery: Atmospheric Emission License as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)**

The scope of the AEL audit includes:

- (a) Mafube Colliery: Springboklaagte's level of compliance with the conditions of the AEL.
- (b) The relevance of the AEL in terms of the continued appropriateness and adequacy of the AEL.

## 4. AUDIT RESULTS

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

The checklist used to assess compliance with the AEL conditions is provided in Tables 3:

<b>TABLE 3.</b>	Atmospheric Emission Licence (Licence No. NDM/AEL/MP313/14/06) dated 28 January 2025, issued by Nkangala District Municipality to Mafube Colliery: Atmospheric Emission License as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
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**TABLE 3. ATMOSPHERIC EMISSION LICENCE (LICENCE NO. NDM/AEL/MP313/14/06) DATED 28 January 2025 ISSUED BY NKANGALA DISTRICT MUNICIPALITY TO MAFUBE COLLIERY: SPRINGBOKLAAGTE FOR LISTED ACTIVITY 4.11 IN TERMS OF SECTION 42 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT (ACT 39 OF 2004) FOR THE BRIQUETTING PLANT OF ULTRAFINE COAL**

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<b>4. GENERAL CONDITIONS</b>			
<b>4.1. PROCESS AND OWNERSHIP CHANGES</b>			
4.1.1	The holder of the atmospheric emission licence must ensure that all unit processes and apparatus used for the purpose of undertaking the listed activity in question, and all appliances and mitigation measures for preventing or reducing atmospheric emissions, are at all times properly maintained and operated.	N/A	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection.
4.1.2	No building, plant or site of works related to the listed activity or activities used by the licence holder shall be extended, altered or added to the listed activity without an environmental authorisation from the competent authority. The investigation, assessment and communication of potential impact of such an activity must follow the basic assessment procedure as prescribed in the Environmental Impact Assessment Regulations published in terms of section 24 (5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection. No building, plant or site of works or activities holder were extended, altered or added during the audit period.
4.1.3	Any changes in processes or production increases, by the licence holder, will require prior approval by the licensing authority.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. No changes to the processes or production occurred during the audit period (June 2024 - May 2025).
4.1.4	Any changes to the type and quantities of input materials and products, or to production equipment and treatment facilities will require prior written approval by the licensing authority.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. No changes to the type and quantities of input materials and products, production equipment or treatment facilities occurred during the audit period (June 2024 - May 2025).
4.1.5	The licence holder must, in writing, inform the licensing authority of any change of ownership of the enterprise. The licensing authority must be informed within 30 (thirty) days after the change of ownership.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. No change of ownership occurred during the audit period (June 2024 - May 2025).
4.1.6	The licence holder must immediately on cessation or decommissioning of the listed activity inform, in writing, the licensing authority.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection. Cessation/ decommissioning of the Briquetting Plant has not yet commenced.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<b>4.2. GENERAL DUTY OF CARE</b>			
4.2.1	The holder of the licence must, when undertaking the listed activity, adhere to the duty of care obligations as set out in section 28 of the NEMA.	C	The EMPr approved in the Environmental Authorisation (EA Ref: 17/2/3 G NK21 dated 05 December 2012) is implemented and provides effective measures to prevent environmental pollution, including continuous monitoring of mining operations, employee education on environmental risks, implementation of policies and procedures and management of environmental incidents in accordance with emergency procedures. Additionally, the auditors were provided with a list of incidents recorded on Mafube Colliery's Enablon System and no reportable incidents (no medium or major incidents) were recorded during the audit period (June 2024 - May 2025).
4.2.2	The licence holder must undertake the necessary measures to minimise or contain the atmospheric emissions. The measures are set out in section 28(3) of the NEMA.	N/A	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection.
4.2.3	Failure to comply with the above condition is a breach of the duty of care, and the licence holder will be subject to the sanctions set out in section 28 of the NEMA.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte.
<b>4.3. SAMPLING AND/ OR ANALYSIS</b>			
4.3.1	Measurement, calculation and /or sampling and analysis shall be carried out in accordance with any nationally or internationally acceptable standard. A different method may be acceptable to the licensing authority as long as it has been consulted and agreed to the satisfactory documentation necessary in confirming the equivalent test reliability, quality and equivalence of analyses.	T/N	<p>The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection.</p> <p>The "Mafube Colliery Ambient air Quality Monitoring Procedure" (Doc. No. MFB_MN_003.2.2.2'; dated 30 September 2021) provides the dust fallout procedure in accordance the SANS 1929:2005 Standard. Additionally, the "Mafube Coal Mining (Pty) Ltd: Air Quality Management Plan" (Doc. No. 22-2054 MAFUBE COAL; dated 17 May 2023), compiled by EcoElemental Environmental and Engineering, provides the methods for sampling and analysing which are conducted in accordance with SANS 69:2004 (Framework for implementing National Ambient Air Quality Standards) and SANS 1929:2005 (Ambient air quality – Limits for common pollutants).</p>

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
4.3.2	The licence holder is responsible for quality assurance of methods and performance. Where the holder of the licence uses external laboratories for sampling or analysis, accredited laboratories shall be used.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection. No atmospheric emissions occurred during the audit period.
<b>4.4. GENERAL REQUIREMENTS FOR LICENCE HOLDER</b>			
4.4.1	The licence holder is responsible for ensuring compliance with the conditions of this licence by any person acting on his, her or its behalf, including but not limited to, an employee, agent, sub-contractor or person rendering a service to the holder of the licence.	C	Mafube Colliery: Springboklaagte ensures agents, subcontractors, and employees undergo induction training in environmental management before contract commences. The "Mafube Colliery 2024 Environmental Awareness Induction" was availed to the auditor for verification and includes awareness training on environmental good practice and relevant AEL conditions.
4.4.2	The licence does not relieve the licence holder to comply with any other statutory requirements that may be applicable to the carrying on of the listed activity.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte.
4.4.3	A copy of the licence must be kept at the premises where the listed activity is undertaken. The licence must be made available to the environmental management inspector representing the licensing authority who requests to see it.	C	An electronic copy of the AEL was available at Mafube Colliery during the audit.
4.4.4	The licence holder must inform, in writing, the licensing authority of any change to its details including the name of the emission control officer, postal address and/or telephonic details.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. No changes to relating to details of the emission control officer, postal address, or telephonic details occurred during the audit period (June 2024 - May 2025).
<b>4.5. STATUTORY OBLIGATIONS</b>			
4.5.1	The licence holder must comply with the obligations as set out in Chapter 5 of the Act.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte.
<b>4.6. ANNUAL PAYMENT OF ATMOSPHERIC EMISSION LICENCE PROCESSING FEE</b>			
4.6.1	The licence holder will pay the licencing Authority the processing fee on receipt of the invoice. This will be after the processing fee is finalised by the National Department of Environmental Affairs.	N/A	This condition is out of scope for the audit period (June 2024 - May 2025) .
<b>7. CONTROL DEVICES, EMISSIION UNITS AND REPORTING GROUPS</b>			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<b>7.6. ROUTINE REPORTING AND RECORD KEEPING</b>			
<b>Complaints Register</b>			
	Mafube Coal Mining (Pty), Ltd, as referred to in this document as the “licence holder” must maintain a complaints register at its premises, and such register must be made available for inspections. The complaints register must include the following information on the complainant, namely, the name, physical address, telephone number, date and the time when the complaint was registered together with the action undertaken to resolve the complaint. The register should also provide space for noise, dust and offensive odours complaints.	C	The auditors were provided with the list of complaints from Mafube's Enablon System, in document titled "Enablon 2024". No complaints relating to the AEL were recorded during the audit period (June 2024 - May 2025).
	Furthermore, Mafube Coal Mining (Pty) Ltd must investigate and report to the licensing authority in a summarised format on the total number of complaints logged.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The auditors were provided with the list of complaints from Mafube's Enablon System, in document titled "Enablon 2024". No complaints relating to the AEL were recorded during the audit period (June 2024 - May 2025).
	The complaints must be reported in the following format with each component indicated as may be necessary: Source code / name; Root cause analysis; Calculation of impacts / emissions associated with incidents and dispersion modelling of pollutants, where applicable; Measures implemented or to be implemented to prevent recurrence; and Date by which measure will be implemented.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The auditors were provided with the list of complaints from Mafube's Enablon System, in document titled "Enablon 2024". No complaints relating to the AEL were recorded during the audit period (June 2024 - May 2025).
	The Licensing Authority must also be provided with a copy of the complaints register. The record of a complaint must be kept for at least 5 (five) years after the complaint was made.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The auditors were provided with the list of complaints from Mafube's Enablon System, in document titled "Enablon 2024". No complaints relating to the AEL were recorded during the audit period (June 2024 - May 2025).
<b>Annual Reporting</b>			

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
	Mafube Coal Mining (Pty) Ltd must complete and submit to the licensing authority an annual report. The report must include information for the year under review (i.e. annual year end of the company). The report must be submitted to the licensing authority not later than 60 (sixty) days after the end of each reporting period. The annual report must include, amongst others, the following items: Pollutant emissions trend; Compliance audit report(s); Major upgrades projects (i.e. abatement equipment or process equipment); and Greenhouse gas emissions.	NC	The auditors were informed of an 'Atmospheric Emission Licence (AEL) Annual Report: January 2024 – December 2024' . However, the Report has not been submitted, and it proof of submission to the Licencing Authority still needs to be availed to the auditors.
	Mafube Coal Mining (Pty) Ltd must keep a copy of the annual report for a period of at least 5 (five) years and be in the position to provide it when requested by the licensing authority.	C	Mafube Coal Mining (Pty) Ltd was found to be compliant with this requirement. Copies of the annual reports are systematically maintained and retained for a period of at least five (5) years. The records were readily available and could be provided upon request, demonstrating effective document control and adherence to the licensing authority's reporting and record-keeping obligations.
<b>Greenhouse Gas Reporting</b>			
	Reporting in terms of Section 43 (1) (i) shall be done in accordance with the national Greenhouse Gas Reporting Regulations.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection.
<b>8. DISPOSAL OF WASTE AND EFFLUENT ARISING FROM ABATEMENT EQUIPMENT AND CONTROL TECHNOLOGY</b>			
8.1	The disposal of any waste and effluent arising from the abatement equipment control technology must comply with the relevant legislation and requirements of the relevant authorities. "Source Code/Name: 1 Waste Effluent Type: PVA dust Hazardous Components Present: None Method of Disposal: Deposited into the PVA silo"	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte. The Briquetting Plant was not operational during the audit period (June 2024 - May 2025) and this was verified during the site inspection. No waste or effluent from the abatement equipment was generated during the audit period.
<b>9. PENALTIES FOR NON-COMPLIANCE WITH LICENCE AND STATUTORY CONDITIONS OR REQUIREMENTS</b>			
9.1	Failure to comply with any of the licence and relevant statutory conditions and/or requirements is an offence, and licence holder, if convicted, will be subjected to those penalties as set out in section 52 of the AQA.	T/N	The condition is noted and accepted by Mafube Colliery: Springboklaagte.

NO.	CONDITION	STATUS	AUDIT OBSERVATIONS (FINDINGS)
<b>10. APPEAL OF LICENCE</b>			
10.1	The licence holder must notify every registered interested and affected party, in writing and within ten (10) days, of receiving the Municipal decision.	N/A	The condition falls outside the scope of the audit period (June 2024 - May 2025)
10.2	<p>The notification referred to in 10.1 must: Inform the registered interested and affected parties of the appeal procedure provided for in the Municipal Systems Act. Advise the interested and affected parties that a copy of the Atmospheric Emission Licence and reasons for the decision will be furnished on request; and</p> <p>An appeal against the decision must be lodged in terms of Section 62 of the Municipal system act with the Appeal Authority: Nkangala District Municipality, P.O. Box 437, Middleburg, 1050. Tel No. 013 249 2000 Fax No. 013 249 2173 Specify the date on which the licence was issued.</p>	N/A	The condition falls outside the scope of the audit period (June 2024 - May 2025)

## 5. SUMMARY OF THE AUDIT FINDINGS

### 5.1. NON-COMPLIANCES

One (1) non-compliance were raised in terms compliance with the conditions of the Air Emission Licence, as audited in Section 4:

1. The auditors presented with an '*Atmospheric Emission Licence (AEL) Annual Report: January 2024 – December 2024*'. However, the Report has not been submitted to the authority.

**TABLE 4: SUMMARY OF NON-COMPLIANCES AND ACTION PLAN**

NC NO	NON-COMPLIANCE DESCRIPTION	ACTIONS TO ADDRESS NON-COMPLIANCE	RESPONSIBLE PERSON/S	TARGET DATE
NC 001	' <i>Atmospheric Emission Licence (AEL) Annual Report: January 2024 – December 2024</i> '. However, the Report has not been submitted to the authority.	Submit the Annual report to Nkangala district	Ingrid Sithole	06 January 2026

## **6. CONCLUSION**

The External Atmospheric Emission Licence (AEL) Audit for Mafube Springboklaagte (SPL), documented under reference ENV-TR-MA-006 – Mafube SPL External AEL Audit (2025), concludes that the operation is largely compliant with the applicable conditions of the AEL and the relevant legislative requirements. The audit confirmed that appropriate systems, procedures, and records are in place to support effective air quality management and regulatory compliance. Where applicable, minor opportunities for improvement were identified and are not considered to pose a significant risk to compliance. Overall, Mafube SPL demonstrates a satisfactory level of environmental performance and commitment to continual improvement in terms of AEL compliance.

## 7. REFERENCES

- Atmospheric Emission Licence (Licence No. NDM/AEL/MP313/14/06) dated 28 January 2025, issued by Nkangala District Municipality to Mafube Colliery: Atmospheric Emission License as contemplated in Section 43 of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)
- Enablon: Throughput & Production, EMS & Audits, Waste, Air Emissions, Land Stewardship & Rehab, Climate Change & Energy, Materials Consumption, Water-Mafube (2023).
- Mafube Coal: ISO14001:2015 – Monitoring, Audits & Review Procedure (23 March 2023): Ingrid Sithole.
- Enablon: Water Mafube, Materials Consumption, Climate Change & Energy, Air Emissions, Incidents and Complaints, Waste EMS & Audits, Throughput Production (2023).
- Mafube Coal: Aligned Environmental Impact Assessment - (EIA) and Environmental Management Program (EMPr) (September 2018): Regional Manager Mpumalanga

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

The Environmental Assessment Practitioner General declaration:

I, **TEBOHO MOTINYANE** declare that –

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

**Disclosure of Vested Interest (delete whichever is not applicable)**

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

Signature:  \_\_\_\_\_

Company: **NTC GROUP (PTY) LTD**

Date: **11 DECEMBER 2025**

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**

# **APPENDIX C**

## AUDITOR'S CURRICULA VITAE



## **TEBOHO MOTINYANE**

Company: NTC Group (Pty) Ltd

SACNASP: (126871), IAIA-SA

Mobile: +27 (0) 82 459-6874

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

### **BRIEF PROFILE**

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

### **PROFESSIONAL QUALIFICATIONS**

2002: MSc (Environmental Science) - Rhodes University

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

1994: B.Sc. Physics and Physical Geography NUL

### **PROFESSIONAL AFFILIATIONS**

SACNASP(126871)

IAIA-SA

### **PROJECT EXPERIENCE**

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



## 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).

